Government of Pakistan

Federal Ministry of Economic Affairs (MEA)

KP Citizen-Centered Service Delivery Project (P180707)

[Draft]

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

April 09, 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- 1. The Government of Pakistan (the Borrower) will implement the KP Citizen-Centered Service Delivery Project (P180707) with the involvement of the National Database & Registration Authority NADRA (hereinafter the **Project Implementing Entity, PIE**) and the Ministry of Economic Affairs (MEA), as set out in the Loan Agreement and Project Agreement. The International Bank for Reconstruction and Development (he **Bank**) has agreed to provide financing for the Project, as set out in the referred agreements.
- 2. The Borrower and the PIE shall ensure that the Project is carried out in accordance with the World Bank Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Loan Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
- 3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower and the PIE shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Bank. Once adopted, the referred E&S instruments may be revised from time to time with prior written agreement by the Bank.
- 4. As agreed by the Bank, the Borrower and the PIE, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the borrower and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank, the Borrower and the PIE. The borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
MONITORING AND REPORTING		
A REGULAR REPORTING The Project will prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).	Submit Bi-annual Environmental and Social Progress Monitoring reports to the Bank on an agreed format throughout Project implementation, commencing 6 months after the Effective Date. Submit each report to the Bank no later than 15 days after the end of each half-year period. The reporting will be throughout the project implementation.	Project Manager (PM) of the PM 1. Environment and Social (E&S) and Gender Specialists
 B INCIDENTS AND ACCIDENTS 1. Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injuries. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor, as appropriate. 2. Subsequently, at the Bank's request, prepare a report on the incident or accident and propose measures to address 	 Notify the World Bank no later than 48 hours after learning of the incident or accident. Provide subsequent report to the Bank within a timeframe acceptable to the Bank. 	Environment and Social (E&S) Specialist (or Gender Specialist if the incident is related with SEA/SH) will report to the Project Manager, PMU. The Project Manager will share incident/accident reports with the Bank.
it and prevent its recurrence. C CONTRACTORS MONTHLY REPORTS		
Require repair and maintenance contractors and any other contractors to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.	Monthly reports within seven days after the end of a calendar month and throughout contract / activity period.	Environment and Social (E&S) Specialist Project Manager MEA and Procurement Specialist NADRA
reports to the Bank. ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SE	OCIAL RISKS AND IMPACTS	

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
1.1	ORGANIZATIONAL STRUCTURE		
	 Establish and maintain a Project Management Unit (PMU) that is tasked with ESHS management with qualified staff and provide resources to support management of ESHS risks and impacts of the Project including an E&S Specialist and Gender Specialist who will support the PM. 	 Within 45 days after Project effectiveness; This organizational structure, including the specialists, should be maintained throughout Project implementation. 	Project Manager
	 Contractor hired for repair and maintenance works (and any other contractors hired under the project for any services) will have in-house E&S expertise, equipped with all necessary material resources, who will comply with relevant environmental and social requirements stipulated in the ESMP, LMP, and other documents if required. 	 Before commencement of the minor repair and maintenance works (barring any routine work) at any CFC 	Environment and Social (E&S) Specialist
	 Project will execute Third-Party Validation (TPV) exercise for annual monitoring of Environment and Social compliance progress during the Project implementation and will share their report with the Bank. 	3. Annually throughout the project lifecycle	Specialist

MATER	IAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
1.2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS			
	 Update the existing Environmental and Social Management Plan (ESMP) of TDP ERP consistent with the relevant ESSs. and adopt/implement the ESMP throughout the project lifecycle. . 	1.	To be revised before appraisal of the project and submitted to the Bank for approval and thereafter implemented throughout the Project implementation. Disclosure and Bank Clearance of ESMP, Environmental and Social Screening Checklist (and all E&S documents prepared under ESCP) completed before issuance of any bidding document and prior to commencement of any minor rehabilitation works under the overall Project.	1. PMU
	 Develop and adopt environmental and social checklists for minor electrical and repair work under the project. These screening checklists will be used for the screening of project sites and provision of mitigation measures for installation of solar panels and related minor repair/electrical works. 	2.	The checklists will be prepared prior to the issuance of bidding documents.	 PMU. E&S and Gender Specialist under the supervision of PM.
1.3	MANAGEMENT OF CONTRACTORS			
	1. Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, LMP and code of conduct into the ESHS specifications of the procurement documents with contractors. Thereafter, ensure that the contractors comply with the ESHS specifications of their respective contracts.	1.	As part of the preparation of procurement documents and respective contracts.	 PMU. E&S and Gender Specialist with support from Procurement Specialist.
	2. The PIE will monitor Contractor's commitment and compliance and ensure contractors provide details on environmental, social, health and safety (ESHS) performance, recruit qualified OHS staff (if required) and ensure compliance as per ESCP requirements.	2.	Supervision of contractor on implementation of ESCP, ESHS and all other relevant E&S requirements to continue throughout project implementation.	2. PMU. E&S and Gender Specialist under the supervision of PM
ESS 2:	LABOR AND WORKING CONDITIONS	I		<u> </u>

KP Citizen-Centered Service Delivery Project

MATER	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
2.1	LABOR MANAGEMENT PROCEDURES Adopt and implement Labor Management Procedures (LMP) for the Project, including inter alia, provisions on working conditions, occupational health and safety including SEA/SH code of conduct, forced labor and child labor will be included in bidding and contract documents for all contractors, consistent with ESS 2	LMP will be prepared within 60 days of project effectiveness and included as part of the bidding documents and implemented throughout Project life.	PMU. E&S Specialist under the supervision of PM and supported by the Gender Specialist. Procurement and HR NADRA
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERSA project workers SEA/SH sensitive GRM will be developedbased on NADRA's existing SOPS for employee grievances; allproject workers will be trained on these SOPs and a code ofconduct will be signed and followed. TPV will monitor andreport on the efficacy of the system in its periodic reports.FORCED AND CHILD LABORThe bidding documents for KP Citizen-Centered ServiceDelivery Project (P180707) will emphasize forced laborrisks in solar panels and solar components and willrequire that sellers of solar panels to the Project will notengage or employ any forced labor among their workforce. The Borrower and the PIE will require bidders toprovide two declarations: a Forced Labor PerformanceDeclaration (which covers past performance), and aForced Labor Declaration (which covers futurecommitments to prevent, monitor and report on anyforced labor, cascading the requirements to their ownsub-contractors and suppliers). In addition, the Borrowerwill include enhanced language on forced labor in the	Within 60 days of Project effectiveness. Before issuance of Bidding documents for the solar panel	PMU. E&S Specialist and Gender Specialist under supervision of Project Manager; HR Specialist of NADRA E&S Specialist and Procurement Specialist
ESS 3:	resource efficiency and pollution prevention and main	NAGEMENT	

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MATER	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
3.1	HEALTHCARE WASTE MANAGEMENT PLAN: Utilize the healthcare waste management plan prepared as part of the ESMP and implement the measures for healthcare waste management.	Same timeframe as for the adoption and implementation of the ESMP.	E&S Specialist under the supervision of Project Manager
3.2	 RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: 1. Resource efficiency and pollution prevention and management measures will be covered under the ESMP (as per action 1.2 above). 2. Lead/acid/cadmium-based batteries will not be procured for solarization of CFCs. 3. The PIE will ensure incorporation of pollution control compliance, as part of their own responsibilities as well as Contractors' responsibility, i.e., compliance with applicable emission and noise standards and mitigation measures as developed in relevant E&S documents. 	Same timeframe as for the adoption and implementation of the ESMP/Screening Checklist	 E&S Specialist under the supervision of PM Contractors
ESS 4: 0	COMMUNITY HEALTH AND SAFETY		
4.1	COMMUNITY HEALTH AND SAFETY: Community Health, Safety and Security measures will be covered under the ESMP prepared under action 1.2. To manage and mitigate risks associated with natural and man-made disasters (floods, fire, etc.), an emergency preparedness and response plan will be made part of the ESMP.	Prepared as a part of ESMP.	E&S Specialist under the supervision of PM.

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
 4.2 SEA/SH RISKS: 1. Prepare, adopt, and implement a Gender Action Plan (GAP) which includes prevention and mitigation SEA/SH action plan to assess and manage project specific sexual exploitation and abuse (SEA) and sexual harassment risks. 2. SEA/SH Actions included in the GAP will focus on project implementation and sufficient funds will be made available 	 Prepared within 3 months, and once approved, will apply throughout Project implementation. 	 E&S and Gender Specialists PM
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUM	NTARY RESETTLEMENT	
ESS 5 is not relevant to the Project		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMEN	NT OF LIVING NATURAL RESOURCES	
ESS 6 is not relevant to the Project		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY U	INDERSERVED TRADITIONAL LOCAL COMMUNITIES	
ESS 7 is not relevant to the Project		
ESS 8: CULTURAL HERITAGE		
ESS 8 is not relevant to the Project		
ESS 9: FINANCIAL INTERMEDIARIES		
ESS 9 is not relevant to the Project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE	E	

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
 10.1 STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: 1. Update, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, <i>inter alia</i>, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. 2. Various stakeholders will be engaged and consulted throughout the project activities in accordance with ESS10 provisions. Active efforts will be made to seek stakeholders' feedback about the project. The modes and frequency of engagement will be determined by the project's needs and the needs and interests of different stakeholders. 	and then bi-annually during Project implementation.	E&S Specialist under the supervision of PM.
10.2 PROJECT GRIEVANCE MECHANISM: The existing Grievance redress mechanism of TDP-ERP will continue to be maintained and operated to receive and respond to the concerns and grievances of communities and other stakeholders that arise from the KP/FATA Citizen Centered Service Delivery Program, including SEA/SH cases employing a survivor centric approach.	Utilize the existing GRM of TDP-ERP in the KP/FATA Citizen Centered Service Delivery Program	PM with support of E&S and Gender Specialist
CAPACITY SUPPORT (TRAINING)		

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
CS1	Relevant Project staff and Contractor's training may be required in: Stakeholder Engagement, analysis, and mapping Environmental and Social Screening Checklist Emergency Preparedness and Response Disaster Risk Reduction, Response and Management Community Health and Safety Occupational Health and Safety Monitoring and Reporting Gender and gender-based violence including on mitigation against Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH). Gender sensitivity Social Inclusion Hospital & Medical Waste Management Documentation and Reporting Labor Management Procedures Grievance Redress Mechanisms	The first training of the staff will be held prior to the start of Project construction activities and then conducted periodically throughout Project implementation.	E&S and Gender Specialist under the supervision of PM.
CS2	 Training for Project workers: Labor Management Procedures Code of Conduct Mitigation against Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH). Housekeeping, hygiene and waste disposal, pollution prevention and control Safe and defensive driving practices, traffic safety Occupational Health and Safety Emergency Response Preparedness Community Health and Safety Grievance Redress Mechanisms 	Prior to initiating project activities and maintained throughout project implementation.	E&S and Gender Specialist under the supervision of PM.