



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Pakistan	SOUTH ASIA	P177069	
Project Name	Khyber Pakhtunkhwa Rural Accessibility Project (KPRAP)		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing	4/4/2022	5/26/2022
Borrower(s)	Implementing Agency(ies)		
The Islamic Republic of Pakistan	Communication and Works Department, Government of Khyber Pakhtunkhwa		

Proposed Development Objective

The Project Development Objective is to improve rural accessibility to schools, health facilities and markets in Khyber Pakhtunkhwa.

Financing (in USD Million)	Amount
Total Project Cost	310.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The project will improve access to education, health and markets in 18 districts of KP province. The districts will be selected based on the current access conditions, poverty, potential impact, climate change risks, collaboration with districts and readiness; and will cover mainly the Northern, Southern and erstwhile FATA areas of KP which are vulnerable to climate risks, poor performing and remained neglected in the past. The project will also provide livelihood opportunities post COVID scenario during construction and maintenance phase.



D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

Component 1 would finance, inter alia, the improvement of resilience, rehabilitation and maintenance of selected rural roads across the province, including network in NMDs.

Component 2 will support, a school bus program to improve operational efficiency and fuel savings; and logistic program to improve the efficiency, reduce losses, green practices and the access to markets for small farmers.

Component 3 will support project implementation, including road planning, climate-resilient design, construction and Environmental and Social Framework (ESF) responsibilities.

Although KP province - Pakistan's third-largest province by population has made significant progress in poverty reduction in recent years, the merger of FATA (henceforth Newly Merged Districts-NMDs) with KP, has increased the region's development needs. The project will cover communities in that have largest service deficits. Further, in terms of distribution of forests, KP is richest in the absolute term (i.e. percentage of forest area to total forests in the country) i.e., 32.7%. A preliminary list of subproject locations and roads (w) has been identified, but further sites and list of roads will be finalized during project implementation. Therefore a framework approach will be followed with respect to environment and social risks and mitigation measures under which an Environmental and Social Management Framework (ESMF) will be prepared and disclosed prior to Appraisal which will propose a robust system for environmental and social screening of subproject sites. Once sub-project sites are identified, site-specific Environmental and Social Impact Assessments (ESIAs) will be conducted and Environmental and Social Management Plans (ESMPs) will be prepared as necessary.

Additionally, KP province has the largest forest area in the country, with rich biodiversity, including large Protected Areas notified by Khyber Pakhtunkhwa government. Types of forests found in this province include Moist Temperate, Chir Pine, Scrub Tropical Thorn and Oak Forest. ESMF will include the procedures to screen out sensitive/valued natural habitats and eco-systems including forests. Additionally, through ESIAs/ESMP preparation, the exact nature of impacts will be assessed and measures to avoid, minimize, mitigate such impacts as per mitigation hierarchy will be ensured.

Communities in the region have some of the worst poverty and human development outcomes, lowest voice to demand services, and least likelihood of being covered through mainstream service delivery systems due to their size and remoteness. In addition, these areas have the lowest capacity and resources to address local development needs. Having suffered from war, conflict and social and economic exclusion for years, the communities in the NMDs are postwar, fragile and have a general distrust for the state- and state-run services. Schools and primary health facilities in the NMDs were targeted during the insurgency, and many were either destroyed completely or were rendered dysfunctional. Further the province is home to 58% of the Afghan refugees living in Pakistan and these numbers fluctuate with changing security conditions in the neighboring country. This area has a tense environment and potential security risk is high. Finally, given the conservative and patriarchal social fabric of the communities in these areas, activities aimed at increasing women's mobility and access to facilities may face resistance

D. 2. Borrower's Institutional Capacity



The KP Communications and Works Department (C&W) will lead the implementation of the proposed project. The C&W will be responsible for the implementation of the proposed project (design and construction), following the provincial and sectoral development policies. C&W has some experience with World Bank E&S management, including the KP Integrated Tourism Development Project (KITE) which is under implementation and has a considerable civil works component. The C&W will set up a PIU responsible for overall project implementation, procurement, financial management, reporting requirements and monitoring activities, including implementation of the environmental and social management plans. The Bank will conduct during project preparation an evaluation to identify which areas need to be strengthened. Whilst C&W has previous experience working with the World Bank and other international organizations, it does not have experience in implementing the ESF. Institutional strengthening envisaged under Component 3 will greatly contribute to developing environmental and social management capacity. The project will also leverage the recently set-up KP Shared Services Unit for additional preparation support. KP government through the Communication and Works Department will be responsible for project preparation and implementation. The Government of KP will support in the dialogue and the coordination with other departments and inter-agency coordination.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial

The risk is rated Substantial. The project will improve access to education, health and markets etc. in selected districts in KP province. Considering the potential environmental risks of proposed project activities and Borrower's limited exposure to ESF implementation, environmental risk rating is considered substantial at this stage of the Project. Component 1 focuses on the improvement of resilience, rehabilitation and maintenance of select rural roads across the province, including network in Newly Merged Districts (NMDs). At PCN stage, the project envisages constructing two new rural roads, within the same right of way. Construction stage activities may have negative impacts due to civil works, which will likely generate adverse site-specific environmental and social risks and impacts for which mitigation measures can be designed, such as but not limited to increased level of dust, noise and vibration by machineries, disposal and management of excavated material generated from construction activities and labor camps during the construction phase, pollution surface and groundwater sources, occupational health and safety of workers both during the construction and operational phases, community health and safety risks which also include increased risks due to COVID-19, waste water as well as, if not managed properly, potential impacts on indigenous flora and fauna, resulting in increased land and habitat degradation and loss of biodiversity. In this regard, mitigation measures, will be proposed as part of the ESMF developed during project preparation and further site specific studies in order to avoid, minimize, reduce or offset the negative impacts will be conducted. Particular attention will be given to address any negative impacts on protected areas and any endangered/protected flora and fauna species, wherein effects of the activity on such species and mitigation, monitoring, implementation and budgeting plan will be identified prior to initiation of the subproject activities. Component 2 focuses on operation efficiency and fuel savings through a new bus programming the improvement of fuel efficient fleet, strengthen road safety and school transport services and a logistic program to improve the efficiency, reduce losses, green practices and the access to markets for small farmers under better conditions and international best practices. Similar to Component 1, E&S risks and impacts of small infrastructure works will be assessed prior to construction and will be



managed according to specified environment and social management plans (ESMPs). It must be noted that, at PCN stage, the project does not envision scrapping/decommissioning of old buses.

Social Risk Rating

Substantial

Upgrading and maintenance activities of rural roads will bring social benefits for the rural communities, through improved access to markets and services. The Social Risk Rating of Substantial is based on the potential project risks involving land and livelihoods, CHS and OHS risks associated with civil works and the limited capacity of the borrower to manage E&S risks. Potential adverse impacts on communities are expected in terms of labor influx, which may generate additional social risks and impacts, including increased in gender-based violence and sexual exploitation and abuse and sexual harassment, impacts on community dynamics as a result of incoming workers, child labor, and increased pressure on community resources. The prevailing security situation the region will affect project supervision and labor management. Potential social impacts could also relate to increased inequality and elite-capture, in particular depending on road and route selection undertaken under Component 1. Involuntary resettlement is possible, in addition to temporary economic displacement and livelihood impacts. While social relations are generally smooth amongst the tribes that populate the NMAs and lagging districts, some social tensions have emerged over access to humanitarian and development resources. Therefore, although the transport and logistics services envisaged under Component 2 have the potential to significantly improve access to health, education and markets for disadvantaged communities, they also have the potential to increase intra-regional inequalities, and exacerbate local conflicts. Finally, the school bus program proposed will need to incorporate measures necessary to keep students safe amid the COVID-19 pandemic, as well as driver training and associated road safety measures. There are concerns related to gender-based violence and the need for gender-sensitive remedial services is critical and this will be further assessed in the project preparation stage.

Public Disclosure

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

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The expected environmental and social impacts of the project will be generally positive given that the project focus is on improving access to education, health and markets etc. in 18 districts in KP province. The proposed project activities may have potential adverse environmental and social risks and impacts due to the proposed new rural roads and civil works under components 1 and 2. Under ESS1, an Environmental and Social Management Framework (ESMF) will be prepared assessing baseline conditions, identifying the potential risks and impacts of the projects and proposing mitigation, monitoring and implementation approaches. The ESMF will include guidance for E&S screening and preparation of site and sub-project specific E & S assessments and plans. The ESMF will be prepared by the client, consulted upon, reviewed and cleared by the Bank and disclosed both in-country and in the World Bank's website before appraisal. The ESMF will provide the criteria and procedures for screening sub-project investments and guide the preparation of site-specific environmental and social impact assessments/management plans (ESIAs/ESMPs) as needed. It will also assess the institutional capacity of the borrower and provide measures for capacity building, and an estimated budget required for implementing the ESMF. The social risks will be assessed at the project level in the ESMF, and at the sub-project level in ESMPs. A Security Risk Assessment (SRA), which will



include a determination of the level of security required for the project personnel and assets, will be undertaken as part of the ESMF, and security management plan prepared as needed in accordance with the Good Practice Note “Assessing and Managing the Risks and Impacts of the Use of Security Personnel.” Temporary labor influx may generate additional social risks and impacts, including increase in gender-based violence and sexual exploitation and abuse and sexual harassment, impacts on community dynamics as a result of incoming workers, child labor, and increased pressure on community resources. Similarly, the potential for labor influx and intra-regional exclusions from effective participation in decision making and lack of equitable access to project benefits remains potentially high. These risks and impacts will be further elaborated in the ESMF and appropriate mitigation measures developed.

Other relevant management plans such as the Contractor’s Environmental and Social Management Plan (C-ESMP), Occupational Health and Safety Plan (OHP)/Community Health and Safety Plan (CHP), Waste Management Plan (WMP), Traffic Management Plan (TMP), etc. would be developed as needed and relevant to sub-project activities as part of the ESMPs. The ESMF will cover overall guidance for the development of these site specific plans and C-ESMP by the contractor (submitted to PIU for review and approval) during implementation of subproject activities and will be further affirmed in the ESMP. The borrower will be required, to ensure contractors, as a condition of their contracts with the Project, implement and comply with the ESIAs/ESMPs, including preparing construction management plans. In addition, workers codes of conduct and trainings on OHS/CHS shall be developed.

Areas where “Use of Borrower Framework” is being considered:

Not being considered at this stage

ESS10 Stakeholder Engagement and Information Disclosure

The C&W department will develop a Stakeholder Engagement Plan (SEP) to provide means for effective and inclusive engagement with stakeholders throughout the project life cycle on issues that could potentially affect them. The SEP will ensure that appropriate information on project risks and impacts are disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format. The SEP will also include a grievance redress mechanism (GRM) to receive and facilitate the resolution of concerns and grievances. The process of stakeholder engagement will begin during Project preparation and will continue throughout implementation. The SEP will be updated as necessary during the life of the Project and will employ a structured approach to stakeholder engagement and public outreach that is based upon meaningful consultation and disclosure of appropriate information. Key issues that would need to be addressed in the SEP include: the potential for labor influx, the ongoing uncertain security situation, and intra-regional exclusions which could negatively impact effective stakeholder and community outreach.

Further, given the ongoing COVID-19 epidemic, the SEP will be prepared and implemented in accordance with government mandated SOPs, and WB and WHO/CDC guidelines for ensuring the basic principles of infection prevention, such as social distancing, consultations with small number of participants in well-ventilated spaces, and good hygiene practices. In case of any lockdowns, electronic and remote means of communications will be used instead of face-to-face meetings and consultations



B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project is expected to involve: (i) Direct workers working for the project implementation agencies, (ii) Contracted workers which include supervision consultants, contractors and where needed sub-contractors; and (iii) primary supply workers workers . The project may create some labor related risks and impacts which include, lack of compliance with national employment and labor and occupational health and safety laws and regulations; unsafe and unhealthy working conditions, and Gender Based Violence/Sexual exploitation and abuse, and sexual harassment (GBV/SEA/SH) within the project host communities. The Borrower will therefore prepare Labor Management Procedures (LMP) during preparation which will have detailed information on the work terms and conditions. One of the key areas of work deficit in Pakistan is poor occupational safety and health (OHS) at the workplace in both formal and informal sectors and OHS guidelines as well as worker codes of conduct will be built into LMPs.

ESS3 Resource Efficiency and Pollution Prevention and Management

The proposed construction works under the project might generate air, noise, water, soil, and groundwater pollution. Solid and hazardous waste including construction waste might also be generated. Initial assessment of construction E&S risk will be carried out in the ESA to prepare the ESMF and further assessment will be carried out in sub-projects' ESIA/ESMPs to propose site specific measures. . Natural resources such as sand, stone and wood will be used for road construction and rehabilitation, and collection, use and disposal of those resources can become a sources of pollution. Requirements of natural resources and potential impacts will be assessed in the sub-project specific ESIA including measures to safeguard biodiversity, and the borrow pits and other sources of raw materials will be chosen carefully to avoid critical natural habitats or other highly sensitive areas . Measures will also be proposed for water conservation and avoidance of waste of resources on site. Quarry material will be extracted from a government approved quarry and it will be ensured that the crusher plants are not located in protected/ environmentally sensitive areas. Additionally, measures for borrow sites management during rehabilitation/construction, especially in forest/mountain areas in KP will be included in site specific ESMPs. The project will support efficient water and natural resources use, including effects on water users. Measures to maintain resource efficiency and pollution control will be implemented through project design and ESMPs as appropriate. If required, a GHG emission estimate related to this project will be carried out.

ESS4 Community Health and Safety

Increase in the rate of communicable diseases, sexual exploitation abuse and harassment, and gender based violence are among the many issues that can affect community health and safety. The road and other transport services to be supported under the project would also entail potential risks and opportunities on public safety such as road safety, natural hazards and climate change risks. The environmental and social assessment instruments will further assess and elaborate on project risks and impacts on community health and safety and mitigation measures including project design elements will be provided in the project ESMPs, and other relevant project instruments as necessary. Emergency maintenance and contingency plans will be prepared to address risks related to road safety, natural



hazards and climate risks. COVID-19 health protocols for transport services and COVID-19 SOPs for workers and contractor during civil works will be also implemented to reduce and mitigate the risks of COVID-19 infection. For stakeholders consultation, strict COVID-19 SOPs will also be ensured.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

As the specific sites of rural roads to be rehabilitated/upgraded or constructed are not known at present, a resettlement policy framework (RPF) will be prepared to guide the management of the potential impacts on land and land use related to project activities. A Resettlement Policy Framework (RPF) outlining the guidelines and procedures for land acquisition, involuntary resettlement and livelihood impacts will be prepared, consulted, and disclosed before appraisal. Site-specific Resettlement Action Plans (RAPs) will be prepared as needed when sub-project locations are identified during project implementation. Each sub-project identification will be preceded by an environmental and social screening to determine its risks and impacts, and whether it meets the selection criteria. Screening of proposed activities will help avoid works requiring physical displacement of population, where possible. It will be ascertained during appraisal whether there are likely to be non-title users of the land within the existing Right of Way (RoW) of the proposed sites for the construction of the rural roads. If this is the case, specific mitigation measures will need to be incorporated into the RAPs. Economically displaced persons who are without legally recognizable claims to land may have to be compensated for lost assets and livelihood opportunities

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

It is not known at this point whether the proposed construction/rehabilitation rural roads will be located in legally protected areas or areas of high biodiversity values. Analysis of any potential risks and impacts on different types of habitats as well as assessment of ecosystem services will be conducted during the preparation of the site-specific ESIA/ESMPs prepared in accordance with the ESMF. The screening criteria and procedures will be developed as part of ESMF to avoid, minimize and mitigate the potential impacts in the protected areas and areas with high biodiversity values including forests. Mitigation measures will be proposed in accordance with mitigation hierarchy based on the sub-projects' ESIA/ESMPs. Such measures would include site selection to avoid critical habitats and biodiversity loss to maximum extent possible, focusing on more densely settled, non-frontier rural areas and areas with existing linear structures. Engineering solutions would include wildlife crossings, proper water drainage, and maintenance of proper tree canopy as part of project design. Other mitigation measures would include proper warning road signage, speed limits establishment and strategically placed speed bumps. Similarly, impacts during construction of roads will also be identified with proper mitigation measures as part of ESMF and ESIA/ESMPs. These mitigation measures will be included in the Bidding documents and contracts for road works, specifying the environmental rules and conditions which contractors should follow, along with non-compliance penalties and environmental supervision arrangements. The project might likely use raw materials for construction which will be sourced following measures described in the Good International Industry Practices (GIIPs).

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities



This standard is currently relevant. Pakistan’s only recognized Indigenous Peoples, the Kalash, live in 3 valleys in Chitral district of Khyber Pakhtunkhwa province, which is part of the initial set of districts indicated under the project. If any of the sub-project sites are located in areas in or nearby these valleys, an IPDF/IPDPs will be prepared.

ESS8 Cultural Heritage

The environmental and social assessment will confirm the existence of tangible or intangible cultural heritage. If sites or features are identified, then a cultural heritage management plan may be required. However, specific procedures (such as chance finds procedures) are included in the ESMF and will be included in subsequent ESIA/ESMPs as required. All construction contracts will include a “Chance Find” clause which will require contractors to stop construction in the event that cultural property sites are encountered during construction. The execution of the project will be done in a culturally appropriate manner with due consultations with the beneficiary communities. Siting sub-project on or near community heritage sites, sacred spaces or affecting tangible or intangible cultural resources may heighten risks of opposition to the project and will be identified during the stakeholder consultation process in collaboration with the communities and appropriate mitigation measures will be adopted to mitigate any adverse impacts. Khyber Pakhtunkhwa is rich in cultural assets, but at this stage it is difficult to ascertain projected impacts. A Physical Cultural Resources Management Plan (PCRMP) may have to be prepared as part of ESMP in event any PCR is identified during construction activities

ESS9 Financial Intermediaries

Not currently relevant

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

Not known at this stage

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

- Preparation, consultation, and disclosure of a Environmental and Social Commitment Plan (ESCP) –Before Appraisal.

Public Disclosure



- Preparation, consultation, and disclosure of a Stakeholder Engagement Plan (SEP) and Labor Management Procedures (LMP)- Before Appraisal.
- Preparation, consultation, and disclosure of Environmental and Social Framework (ESMF), and Resettlement Policy Framework (RPF)- Before Appraisal.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

- Preparation and implementation of ESIA, ESMPs and RAPs of sub-projects as necessary as the result of E&S screening
- Inclusion of ESMF and LMP requirements shall be part of of bidding and contractor documents
- Implementation of the SEP
- Hiring of at least one environmental specialist and one social development specialist for the PIU
- Setting up and making the GRM operational
- Preparation of the Project Operational Manual to ensure transparent project implementation
- Emergency Maintenance and Contingency Management Plan

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

01-Mar-2022

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: The Islamic Republic of Pakistan

Implementing Agency(ies)

Implementing Agency: Communication and Works Department, Government of Khyber Pakhtunkhwa

V. FOR MORE INFORMATION CONTACT



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VI. APPROVAL

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Practice Manager (ENR/Social)	Robin Mearns Recommended on 05-Oct-2021 at 08:15:3 GMT-04:00
Safeguards Advisor ESSA	Pablo Cardinale (SAESSA) Cleared on 29-Sep-2021 at 14:32:25 GMT-04:00