



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 04/27/2022 | Report No: ESRSA02047



**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	4/25/2022	6/9/2022
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 access to schools, health facilities and markets through safe and resilient infrastructure in selected districts of Khyber Pakhtunkhwa.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>310.00</b>

**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 rural access to schools, health facilities, and markets through safe and climate resilient infrastructure in selected districts of KP province. The districts have been selected based on the geospatial accessibility analysis and the climate change risks. The major gaps are located in the Northern, Southern and New Merged Districts (NMDs) of KP. The total cost of the project is US\$310 million, out of which US\$300 million (IDA) and US\$10 million by the GoKP. The project comprises three components, as presented below.

Component 1: Safe and climate resilient access (IDA will finance US\$270 million and GoKP will finance US\$10 million).



Road upgrading and rehabilitation of existing roads. For selected rural roads in priority districts across the province. It will ensure provision of climate resilient roads providing improved all-weather accessibility to basic services. The roads were prioritized based on geo-spatial analyses which identified roads that would maximize access gains to schools, markets, and healthcare facilities considering climate change risks. The rehabilitation of roads will not require land acquisition.

Climate resilience of infrastructure. To improve climate resilience of roads, ensuring all-weather accessibility to basic services and savings in the recurrent reconstruction costs. Measures include raising embankments, providing side drains, improvement of culverts, ditches, vegetation, bridges, enhanced slope protection, adopting design standards for pavements that reflects a higher level of climate resilience, a decision to seal previously gravel roads, and geometric improvement of roads to enhance road safety. Drainage design will take the effects of more frequent and increased precipitation. In addition, the component will include green techniques to mitigate effects of rainfall and high temperatures.

Infrastructure in the vicinity of schools and other facilities. This component will also improve infrastructure in the vicinity of schools, health facilities and marketplaces to ensure safety of children, pedestrians, and cyclists to and from these facilities. These improvements will include the provision of sidewalks, bike lanes (if necessary), road markings, signage, traffic calming measures i.e., rumble strips, marking of reduced speed zones, delineators, and guard rails etc. Specifically in the vicinity of schools, ramps to facilitate movement of differently abled children will also be considered where appropriate, including gender approach and universal access.

Fiberoptic infrastructure. This component will also provide basic fiberoptic infrastructure i.e., ducts and manholes alongside selected roads to facilitate the expansion of internet connectivity in the future.

Component 2. Safe school journeys for girls (IDA: US\$14 million). In order to translate improved all-weather access to roads to concrete outcomes in terms of girls' education, the project will support the provision of subsidized transport to schools for girls from marginalized communities. The component will focus initially on middle school-age girls where home-to-school distances are much larger than primary schools, resulting in sharp declines in enrolment. Once the intervention is more mature, it may be extended downwards to upper primary school, where out of school rates are still significant, albeit lower than in middle schools. While the intervention will focus primarily on female students, a small number of female teachers may also be supported to enhance safety perceptions among parents. The component will be implemented in 5 selected districts among the 18 in Component 1. The districts of Battagram, Hangu, Kohistan, Shangla, and Torghar have been chosen based on having among the highest rates of out-of-school girls.

Component 3: Project management and institutional strengthening (IDA US\$11.5 million). This component will cover two subcomponents:

Sub-component 3.1 Project Management. (IDA USD 5 million). Inter alia, the administrative and operational costs related to implementation and monitoring of Component 1 and 2, technical assistance (TA), the core staff of the project implementation unit (PIU), auditing costs, capacity building for the PIU staff, education department and implementation and monitoring of the environmental and social safeguards standards (E&S).

Sub-component 3.2 Institutional Strengthening Program (IDA USD 6.5 million): The loan will finance a comprehensive road sector reforms to improve policies for road sustainability, road funding, financing, and the capacity of CWD to select, prepare, allocate efficient resources, procure and manage road works contracts including emergency works. The program will include the development of a GIS based Road Asset Management System (RAMS) with a capability to plan and maintain the network, including based on actual requirements, accessibility and the risk of climate vulnerability and tools for paving efficiency, the creation of sustainable microenterprises for routine maintenance with gender considerations, introduction of modern and climate resilient design and construction practices, tooling policy and e-tolling, performance-based contracts, public-private participation in roads (project preparation and



contract management). The project will also use the World Bank developed Geo-Enabling Initiative for Monitoring and Supervision (GEMS) for remote monitoring of road upgrading and infrastructure works funded by the project. The sub-component will build on efforts to strengthen data on schools (including private) funded under the KP Human Capital Investment Project.

#### **D. Environmental and Social Overview**

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

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 that have largest service deficits.

KP province has the largest forest area in the country (i.e. percentage of forest area to total forests in the country) i.e., 32.7%, 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. This climatically diverse province spans six climatic regions: semi-arid lowland, semi-arid highland, sub-humid, humid, and arid. The mountainous northern region is marked by temperate summers (not climbing above 38C) and very cold winters, while the southern region experiences maximum temperatures ranging between 47C and 50C. Khyber Pakhtunkhwa has two wet seasons, the summer monsoon from June to September, and the winter from October to November. Annual precipitation varies throughout the province, exceeding 1000 mm in northern areas and dropping below 250 mm in the south. The terrain of Khyber Pakhtunkhwa is dominated by mountains, with the Hindu-Kush range in the north-west, the Himalayas in the north-east, and the Safed Koh-Charat range in the south. There are also plains irrigated by multiple rivers. Compared to other provinces, KP is especially vulnerable to climate change given its terrain and topography. Between 1970 and 2020, 20 extreme weather events including floods, landslides, and avalanches impacted KP.

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 following World Bank Safeguard Policies, including in the KP Integrated Tourism Development Project (KITE) which is under implementation and has a considerable civil works component. C&W also have previous experience working with other international organization. However, it does not have experience in implementing the WB ESF. 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. Institutional strengthening activities envisaged under Component 3—including activities to build the capacity of CWD to implement and manage road works contracts—will greatly contribute to developing environmental and social management capacity. In the ESCP, C&W is committing to establishing a full-fledged Environmental and Social Management Unit (ESMU) to work under the PIU. Additionally, the PIU will be supported by a Design and Supervision (D&S) Consulting firm including relevant environmental and social staff. The GoKP has also hired individual consultants including E&S consultants to work with the respective team members of PIU as a stop gap arrangement till the completion of hiring process of a D&S firm.

**II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)**

Substantial

**Environmental Risk Rating**

Substantial

The environmental risk is assessed to be substantial. The project will improve access to education, health, and markets in selected districts of KP by rehabilitating selected roads with a total length of approximately 1,200 km (Component 1), and facilitating transportation for girl’s and female teachers (Component 2) to school. Construction activities in Component 1 will primarily involve rehabilitation of rural roads such as resurfacing, provision of side drains, sidewalks and vegetation, improvement of culvert and enhanced slope protection works, with a minimal amount of widening within existing rights-of-way. These activities may have negative impacts including: soil erosion and pollution due to excavation of borrow areas, land leveling, and land clearing; generation of construction related solid waste which may contaminate soil and nearby water resources, and cause blockages in drainage channels; noise and air pollution generated from construction vehicles and machinery; and disturbance to important ecosystems and biological resources. The environmental risks for Component 2 will be minimal, and are mostly related to the efficiency and control of emissions of the private school transport vehicles. Natural hazards such as floods and earthquakes are cross cutting risks that will apply to all components and remain relevant throughout the duration of the project. Flood risks are assessed to be high in around 6% of the long-list roads, with roads in Tank district likely to be most affected. Subprojects that are likely to impact protected areas, endangered/protected species, or sensitive/valued natural habitats and eco-systems will not be supported by the project.

**Social Risk Rating**

Substantial

The project is anticipated to have a substantial social risk rating. Risks related to Component 1 include: noise pollution and traffic congestion/safety issues due to construction equipment and increased traffic; social exclusion of vulnerable groups in project employment, particularly women and indigenous peoples; temporary or permanent involuntary resettlement and economic displacement of roadside vendors and minor encroachments along the existing rights-of-way, particularly on roads that will be widened; occupational health and safety impacts on project

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workers engaged in construction work; security risks to project workers and staff, especially in NMDs where security concerns are particularly salient; exacerbation of existing social conflicts; labor influx related impacts; forced labor and child labor used for construction work by contractors; and chance findings of important physical cultural resources. Risks related to Component 2 include: misappropriation of grant funds provided to PTCs for subsidizing school transport; road safety related risks that may impact users of the school transport services; and GBV/SEA/SH risks described below. Cross-component risks include, lack of meaningful stakeholder engagement, particularly with beneficiary and vulnerable communities/individuals; COVID-19 risks for both project labor in Component 1, and road transport users in Component 2; and community health and safety risks related to construction

## **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:***

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 civil works and subsidization of school transport services for girls and female teachers under components 1 and 2. A preliminary list of subproject locations and roads has been identified, but further sites and list of roads will be finalized during project implementation. Therefore a framework approach is followed with respect to environment and social risks and mitigation measures.

Under ESS1, an Environmental and Social Management Framework (ESMF) has been prepared to assess baseline conditions, identifying the potential risks and impacts of the projects and proposing mitigation, monitoring and implementation approaches. The ESMF includes guidance for E&S screening and preparation of site and sub-project specific E&S assessments and plans. It also assesses the institutional capacity of the borrower and provide measures for capacity building, and an estimated budget required for implementing the ESMF. The ESMF was prepared by the client, and will be consulted upon, reviewed and cleared by the Bank and disclosed both in-country and in the World Bank's website. The social risks have been assessed at the project level in the ESMF, and will be assessed at the sub-project level in site-specific ESIAs/ESMPs. To mitigate security risks, contractors on Component 1 activities will be required to prepare site specific Security Management Plans (SMPs) prior to beginning construction work. The ESMF contains indicative guidance on the preparation of the SMPs.

Temporary labor influx may generate additional social risks and impacts, including increases 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. Additionally, intra-regional exclusions from effective participation in decision making and lack of equitable access to project benefits remains potentially high. These risks and impacts are further elaborated in the ESMF and appropriate mitigation measures will be 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 for activities in Component 1. The ESMF covers 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 ESMPs. The borrower will be required, to ensure contractors, as a condition of their contracts with the Project, implement and comply with the ESIA/ESMPs, including preparing construction management plans. In addition, workers codes of conduct and trainings on OHS/CHS shall be developed.

### ESS10 Stakeholder Engagement and Information Disclosure

The C&W Department has developed a Stakeholder Engagement Plan (SEP). The SEP will be disclosed publicly (on the website of the implementing agency C&W and the WB) and will be updated during the early implementation phase. Other E&S management instruments such as the ESMF, RF and LMP prepared for the project will also be disclosed and translated into local languages. C&W will also strengthen its existing GRM to enable stakeholders to air their concerns/grievances/provide feedback/ suggestions. Preliminary consultations were held during the preparation stage of the program in March 2022. Two community consultations were held, one in Hazara Division (representing Buner, Chagharzai, Gagra, Gadazai, Dagar, Maidar, Khadukhel tehsils) and the other in Khyber Division representing Bara, Jamrud, Landi Kotal and Mula Gori). A total of 188 people engaged in these two community consultation sessions. Overall, both communities responded positively to the information presented about the project. A set of focus group discussions (FDGs) were also conducted with education sector stakeholders on transport barriers and solutions to girls' participation in education.

A detailed stakeholder mapping of the three categories of stakeholders- Affected, Interested and Disadvantaged/Vulnerable Groups has been undertaken and will be used to guide the initial consultations during program implementation. However, given the COVID-19 pandemic context, physical distancing requirements will be in place and appropriate adjustments will be made to the mode used for conducting consultations in accordance with prevailing national COVID-19 protocols. Virtual consultations will be held using WebEx, telephone calls, SMS and emails.

A robust GRM will be established to ensure that stakeholders across the board are able to access an effective platform for having their complaints addressed and resolved. The GRM framework for KPRAP will provide mechanisms for all project stakeholders and beneficiaries, and staff (including contractor staff) to lodge their concerns and complaints. Given that the nature of complaints and resolution mechanisms for different stakeholders may vary, the KPRAP project GRM will house the following sub-GRMs:

- Community GRM – to handle grievances from local communities and beneficiaries as directed by the SEP
- Labor GRM – for handling grievances raised by project workers including labor-related SEA/SH reports, including direct and indirect workers, as directed by the LMP
- GBV and SEA/SH GRM – as per the requirements of the GBV/SEA/SH Action Plan and aiming to provide safe spaces for survivors to report incidents and an ethical response to cases when they come forward



## **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. The main labor risks associated with the project are assessed to be the associated risks of accidents and incidents at the work place, child labor and forced labor, and associated community health and safety risks, including Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) risks and the capacity of the implementing agency to manage and mitigate the environmental and social (E&S) risks and the context under which the Project is being implemented. Labor influx will be small scale and most of the unskilled labor will be hired from local communities. The project also poses various risks of injuries and accidents for workers while working on the upgrading and rehabilitation of roads and associated structures. The Government of KP has prepared a Labor Management Procedures (LMP) outlining the requirements with regard to labor and working conditions to be applicable during the implementation phase of the proposed project. It aims to guide the management and control of activities that may pose labor-related risks during the project implementation, including risks related to occupational health and safety of labor. Adherence to the LMP will be a mandatory requirement applicable to all types of workers that will be employed by C&W as well as its consultants, contractors, sub-contractors and labor supply contracting agencies, third parties, and all personnel related to the execution of the project. C&W through its Project Implementation Unit (PIU) has the overall responsibility for project management and to oversee all aspects of the implementation of the LMP, to ensure contractor compliance. The E&S team in PIU will implement and monitor the implementation of the LMP.

### **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 would also be generated. Initial assessment of construction E&S risk has been carried out in the preparation of 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/ESMPs 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 site-specific ESMPs and Solid Waste Management Plans (SWMPs\_ Component 2 would entail environmental pollution in relation to transport





service provision for schooling. Pollution prevention and management will be ensured through environmental and social requirements to be included in the concession agreement with private operator

#### **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, particularly due to potential contact between project labor and communities while implementing activities under Component 1, and contact between private transport providers and women and girls in Component 2—which could also increase the likelihood of GBV and SEA/SH incidents. 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, which will be mitigated by the preparation of site-specific traffic management plans by the contractors. The site-specific ESMPs will further assess and elaborate on additional project risks and impacts on community health and safety, and provide mitigation measures including on sub-project design elements. The road design features to be introduced through rehabilitation works such as side drains, culverts, slope protection, sidewalks and guard rails will improve safety for the roads for community use. 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 contractors during civil works will also be implemented to reduce and mitigate the risks of COVID-19 infection. For stakeholders consultation, strict COVID-19 SOPs will also be ensured. Security risks are also relevant, where project activities might exacerbate or create social conflicts that may affect the community. These risks will be mitigated by the preparation of site-specific Security Management Plans by the individual contractors. GBV, SEA, and SH risks will be mitigated by the implementation of a project-level GBV/SEA/SH Action Plan which will be prepared before the commencement of project activities. The Action Plan could include mitigation measures such as sensitization of implementing agencies and community, Codes of Conduct, trainings for workers and project actors, mapping of GBV service providers, recruitment of GBV specialist in PIU and SEA/SH responsive GRM

#### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The proposed KPRAP subprojects involving upgrading and rehabilitation of rural roads that have the potential of causing social impacts including involuntary resettlement. However, at this stage of the Project, it is difficult to estimate the extent of resettlement impacts including number or likelihood of people to be negatively impacted by the Project, as the locations and other details have not yet been determined. It is assessed preliminarily that the project will have limited permanent land needs for upgrading and rehabilitation of roads. The road improvement works will mostly follow the existing Right of Way (RoW) and will generally have limited impacts whether permanent or temporary. These will be assessed during project implementation phase when the subproject details are known. To address the potential resettlement impacts of the project and to provide principles and procedures for resettlement planning and implementation, a Resettlement Framework (RF) has been prepared, in compliance with the WB Environmental and Social Framework (ESF) as well as the relevant legislation of Pakistan relating to the resettlement aspects.

#### **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 near 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 are developed as part of the ESMF to avoid potential impacts in the protected areas and areas with high biodiversity values including forests. Subprojects with the potential to have such impacts will be screened out and not supported by the project. Mitigation 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. Any activities requiring the removal of trees from forest areas will require prior approval by the Forest Department, or other relevant authority. 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 in areas in or nearby these valleys, IPPs will be prepared. Guidance for the preparation of IPPs is provided in the Indigenous Peoples Planning Framework in the ESMF. Consultations were conducted in 2018 as part of the Khyber Pakhtunkhwa Integrated Tourism Development Project (KITE), particularly with reference to the Kalash community. The project also involved construction and maintenance of road infrastructure in some of the geographical areas covered under KP RAP. Therefore, some of these consultations conducted under KITE project are also relevant for the KP RAP, and relationships and community liaisons established will be built on during the implementation phase of KP RAP.

#### **ESS8 Cultural Heritage**

The site-specific ESIA/ESMPs will confirm the existence of tangible or intangible cultural heritage. However, specific procedures (such as chance finds procedures) are included in the ESMF and will be included in subsequent 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 the exact project impacts on them. A Physical Cultural Resources Management Plan (PCRMP) may have to be prepared as part of ESMPs if any PCRs are identified during construction activities.



**ESS9 Financial Intermediaries**

Not currently relevant

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways**

No

Not applicable

**OP 7.60 Projects in Disputed Areas**

No

All areas are under the jurisdiction of the GoKP

**B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts**

**Is this project being prepared for use of Borrower Framework?**

No

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

Not being considered at this stage

**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**

Public Disclosure



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## **VI. APPROVAL**

Task Team Leader(s):	Hasan Afzal Zaidi, Lincoln Flor
Practice Manager (ENR/Social)	Robin Mearns Cleared on 05-Apr-2022 at 10:21:55 GMT-04:00