

**Islamic Republic of Pakistan
Sindh Flood Emergency Rehabilitation Project
(SFERP): P179981**

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

November 17, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Pakistan (the Borrower) will implement the Sindh Flood Emergency Rehabilitation Project (the Project) through the Province of Sindh (Project Implementing Entity (PIE)), with the involvement of the Sindh Irrigation Department (SID) and the Planning and Development Department (P&DD), Government of Sindh as set out in the Financing Agreement. The International Development Association (the World Bank), has agreed to provide financing (P179981) for the Project, as set out in the Financing Agreement.
2. The Borrower and the PIE shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower 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 World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World 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 through SID and/or P & DD and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Chairman of SPDD and/or Secretary of SID. The Borrower, through the PIE, shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the World 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, functioning of the grievance mechanism(s), and contractors’ quarterly reports as directed by Action C below.</p>	<p>Quarterly reports to the World Bank throughout Project implementation.</p> <p>Submit each report to the World Bank no later than 21 days after the end of each reporting period.</p>	SID and P&DD
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the World 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 injury, or exposure to hazardous waste. 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 and/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the World Bank no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report on details of the incident and mitigation actions taken to the World Bank within 30 days of the incident.</p>	SID and P&DD
C	<p>CONTRACTORS’ QUARTERLY REPORTS</p> <p>Require contractors and supervising firms involved in physical construction works to provide quarterly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the respective PIUs.</p>	<p>Contractors should submit monthly reports to the PIU.</p>	SID and P&DD
D	<p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</p> <p>Notify the World Bank of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the World Bank of: (i) the</p>	<p>No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).</p>	SID and P&DD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an Environment and Social Management Unit in each Project Implementation Unit with qualified staff and resources to support management of ESHS risks and impacts of the Project including three positions (an Environmental Specialist, Social Development and Resettlement Specialist, Gender Specialist).</p> <p>These will be in addition to the current SRP PIU ESHS staffing.</p>	Hire all positions within 60 days of Project effectiveness and maintain these positions throughout Project implementation.	SID and P&DD
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Conduct a third-party Environment and Social audit of all activities eligible for retroactive financing in Action 1.7 below. PIUs to maintain all necessary documentation and record of such activities in compliance to ESF requirements</p> <p>Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. The ESMF will include plans for the management of community health and safety (CHS), and occupational health and safety (OHS)</p> <p>Prepare subcomponent-wise Environmental and Social Management Plans (ESMPs) for each subproject in Component 1, and relevant instruments for activities under Components 2, 3, and 4, as described in the ESMF.</p> <p>Prepare Labor Management Procedures (LMP), GBV Action Plan, and Resettlement Policy Framework (RPF), as standalone documents aligned with action items 2.1, 4.2, 5.1 respectively.</p>	<p>Prior to disbursement for activities subject to retroactive financing</p> <p>Prepare the ESMF within 60 days of Project effectiveness, and thereafter implement the ESMF throughout Project implementation.</p> <p>Prepare and implement ESMPs/screening prior to procurement and initiation of civil works.</p> <p>Prepare and implement LMP, GBV Action Plan, and RPF within 60 days of Project effectiveness – until such time existing GRM under WB funded Sindh Resilience Project 2 will remain</p>	SID and P&DD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		accessible to all project workers joining in the interim period.	
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the E&S specifications of their respective contracts.</p>	Contractors' requirements to be satisfied prior to commencement of subproject activities and monitored throughout Project Implementation.	SID and P&DD
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, surveys, environmental and social assessments, etc. are carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	SID and P&DD
1.5	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements including, if applicable, any CERC-ESMF/ESMF Addendum for the implementation of all identified CERC components, in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&S) instruments which may be required for activities under the CERC component, of the Project, in accordance with the CERC Manual and, if applicable, CERC-ESMF or CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>a) The adoption of the manual and, if applicable, other instruments, as relevant in form and substance acceptable to the World Bank is a disbursement condition under section III.B.1(b) of Schedule 2 of the Financing Agreement for the Project</p> <p>b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.</p>	Responsible CERC Implementing Entity

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.7	<p>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</p> <p>Prepare and adopt appropriate E&S documents (E&S checklists, ESMP, etc) for each retroactively financed activities.</p> <p>Conduct a third-party E&S audit of all activities subject to retroactive financing, and implement any corrective actions, as required</p>	<p>Prior to carrying out said activities</p> <p>Prior to disbursement</p>	SID and P&DD
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Prepare and adopt the LMP within 60 days of Project effectiveness, and thereafter implement the LMP throughout Project implementation.	SID and P&DD
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. The existing SRP grievance mechanism for project workers should be adopted until LMP is prepared. Grievance mechanism will be responsive to SEA/SH complaints.</p>	Within 60 days of Project effectiveness Existing GRM under WB funded Sindh Resilience Project 2 to be used until the new GRM is established	SID and P&DD
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT.			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3, as part of the ESMPs to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESMPs (action item 1.2)	SID and P&DD
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESMPs (action item 1.2)	SID and P&DD
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in ESMPs to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESMPs (action item 1.2).	SID and P&DD
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project</p>	Same timeframe as for the adoption and implementation of the ESMPs	SID and P&DD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	activities including, inter alia, risks of labor influx, air and noise pollution, spread of communicable diseases, GBV, SEA/SH, elite capture, and include mitigation measures in the ESMPs to be prepared under action 1.2 above.	(action item 1.2).	
4.3	SEA AND SH RISKS Adopt and implement a GBV/ SEA/SH Action Plan, to assess and manage the risks of GBV, SEA and SH.	Prepared and disclosed within 60 days of Project effectiveness and implemented throughout Project implementation	SID and P&DD
4.4	Recruit a GBV Service Provider	Same timeframe as for the adoption of the GBV/SEA/SH Action Plan (action item 4.3)	SID and P&DD
4.5	DAM SAFETY Engage qualified engineers to design dam safety measures for the small dams to be constructed under component-1, in accordance with good international industry practice, and thereafter adopt and implement such measures.	Same timeframe as for the adoption and implementation of the ESMPs.	SID and P&DD
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Adopt and implement a Resettlement Policy Framework (RPF) for any resettlement resulting from the Project, consistent with ESS5.	Prepare and adopt RPF within 60 days of Project effectiveness and implemented throughout Project implementation	SID and P&DD
5.2	RESETTLEMENT ACTION PLANS Adopt and implement a Resettlement Action Plan (RAP) for each activity under the Project for which the RPF requires such RAP, consistent with ESS5.	Prepare and implement RAPs prior to procurement and initiation of civil works.	SID and P&DD
5.3	LIVELIHOOD RESTORATION PLAN Adopt and implement a Livelihood Restoration Plan (LRP) for each activity under the Project for which the RPF requires such LRP, consistent with ESS5	Prepare and implement LRPs prior to procurement and initiation of civil works.	SID and P&DD
5.4	GRIEVANCE MECHANISM Establish and operate a grievance mechanism for Project workers, as described in the RPF and consistent with ESS5. The existing SRP grievance mechanism for project workers should be adopted until RPF is prepared.	Within 60 days of Project effectiveness Existing GRM under WB funded Sindh Resilience Project 2 to be used until the new GRM is established	SID and P&DD
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES [

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Adopt and implement mitigation measures related to biodiversity risks and impacts as part of the ESMF/ESMPs, consistent with ESS6.</p>	Same timeframe as for the adoption of the ESMF/ESMPs	SID and P&DD
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP (action item 1.2), consistent with ESS8.</p>	Same timeframe as for the adoption and implementation of the ESMP (action item 1.2).	SID and P&DD
8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance finds procedures, as part of the ESMF of the Project.</p>	Same timeframe as for the adoption and implementation of the ESMF.	SID and P&DD
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, 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.</p>	<p>Update and disclose the SEP within 30 days of Project effectiveness.</p> <p>Implement the SEP throughout Project implementation</p>	SID and P&DD
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Within 3 months of Project effectiveness – until such time Project GRM under WB funded Sindh Resilience Project 2 will remain accessible for any grievances related to SFERP for the interim period	SID and P&DD
CAPACITY SUPPORT			
CS1	All Project workers (including for construction works such as contractors and community workers) to receive training on	Throughout Project implementation, including when new workers are	SID and P&DD

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> • Occupation Health and Safety (OHS) • Community Health and Safety (CHS) • Prevention of Gender based Violence/SEA/SH • Reporting on incidents and accidents and emergency preparation and response preparedness • stakeholder mapping and engagement • Grievance Mechanism especially for GBV/SEA/SH • Resource Efficiency And Pollution Prevention And Management • Waste Management • Labor Management 	<p>engaged.</p>	
<p>CS2 Both PIUs Directors and staff to receive training on</p> <ul style="list-style-type: none"> • ESF and implementation of Environmental and social instruments • Stakeholder engagement and Grievance Redress Mechanism (GRM), including GRM for SEA/SH • GBV/SEA/SH • Resettlement and Land acquisition • Labor Management • Resource Efficiency and Pollution Prevention and Management 	<p>At the start of the project implementation and refreshers on bi-annual basis</p>	<p>SID and P&DD</p>