

SINDH FLOOD EMERGENCY REHABILITATION PROJECT

STAKEHOLDER ENGAGEMENT PLAN

May 2023

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List of Abbreviations

PAD	Project Appraisal Document
SFERP	Sindh Flood Emergency Rehabilitation Project
CfW	Cash-for-work
SMP	Social Mobilization Partner
GoS	Government of Sindh
LRP	Livelihood Restoration Plan
CO	Community Organization
VO	Village Organization
P&DD	Planning and Development Department
PD	Project Director
E&S	Environmental and Social
SRP	Sindh Resilience Project
PIU	Project Implementation Unit
TOP	Terms of Partnership
LR	Livelihood Restoration
PWD	Person with Disabilities
NSER	National Socioeconomic Registry

1. Introduction

Pakistan experienced heavy monsoon rains in 2022 leading to catastrophic and unprecedented flooding. Almost 15 percent of the country was underwater and just over 33 million people are affected. Sindh has been disproportionately affected by the 2022 floods. The province alone is estimated to have received rainfall in excess of 400% over the 30-year average. Between June 14 and September 26, 2022, 747 of the 1,638 nationwide casualties were in Sindh, including 319 children, with 8,422 people injured.¹ Over 1.8 million houses in Sindh were damaged or destroyed, nearly 89 percent of the nationwide total.² Reports estimate that more than 3.9 million hectares of agricultural land has been destroyed in Sindh alone, giving rise to fears of impending food shortages.³

The 2022 floods will also impact the economy of Pakistan. Growth is expected to reach only around 2 percent in FY23. Due to higher energy prices, the weaker Rupee, and flood-related disruptions to agricultural production, inflation is projected to rise to around 23 percent in FY23.

Pakistan consistently ranks among the top 10 countries worldwide most affected by climate change.⁴ Extreme weather events have increased in frequency and intensity, impacting ecosystems, people, settlements, and infrastructure. Heatwaves, heavy precipitation events, droughts, and cyclones are prevalent risks. There is also significant uncertainty surrounding future precipitation rates in Pakistan, underscoring the need for better preparedness for unforeseen extreme precipitation events. Research highlights the risk of increased frequency and intensity of flood and drought events, brought on by changes in the seasonality, regularity, and extremes of precipitation.⁵ These changes in climate and extreme events are likely to disproportionately affect the most disadvantaged groups, among these low-income businesses, those engaged in manual labor jobs, poorer farmers, women and children. Emergency rehabilitation is essential to facilitate communities in recovering from the 2022 floods.

Project Description

The Sindh Flood Emergency Rehabilitation Project (SFERP) will respond to the impact of the 2022 floods in Sindh by supporting recovery, improving livelihoods, rehabilitating selected infrastructure, and strengthening institutional disaster management capacity, with an aim to improve the climate change and disaster resilience of communities and build back better. The Project Development Objective is to rehabilitate infrastructure and restore livelihoods in selected areas affected by the floods and strengthen the Government's capacity to manage disaster risks and climate impacts.

The Project includes the following components:

¹ National Disaster Management Authority (NDMA). 2022. *NDMA Monsoon SITREP: Daily SITREP No. 105 Dated 26th Sep, 2022.*

² National Disaster Management Authority (NDMA). 2022. *NDMA Monsoon SITREP: Daily SITREP No. 105 Dated 26th Sep, 2022.*

³ Sindh Agriculture Department. 2022. *Damaged Agricultural Land (Provisional).*

⁴ Germanwatch, Global Climate Risk Index 2021. <https://www.germanwatch.org/en/19777>.

⁵ Ibid.

1.1.1 Component 1 – Infrastructure Rehabilitation

Component 1 aims to enhance physical resilience through the restoration, rehabilitation and improvement of critical flood protection infrastructure, water supply schemes, roads and allied infrastructure. A framework approach based on climate resilience will be used to finalize infrastructure subprojects under this component based on damages data. The approach is being adopted due to the emergency nature of the project.

Subcomponent 1.1: Flood Control and Rehabilitation of Irrigation Infrastructure. Floods have brought about significant damages to the irrigation and flood protection infrastructure in Sindh. Critical flood protection infrastructure will be identified and rehabilitated on a priority basis under the principle of ‘build back better’ with improved engineering design features including nature-based solutions as applicable. Some damaged flood protection schemes have already been identified such as Flood Protective (FP) bund, Supriyo bund, and Manchar Containing (MC) embankments in Dadu district of Sindh. The Bank-funded Sindh Resilience Project (P155350) has been financing the construction of small dams in Sindh to serve the dual purpose of groundwater recharge and mitigate the potential flooding in streams which are prone to flash flooding. This subcomponent will take a holistic approach and consider an array of resilience solutions including flood delay dams, leaky dams, flood dispersion dams and off-line storage. The definition of the interventions will be based on watershed/catchment level hydro-economic studies to determine the most beneficial options. Non-structural measures will complement the flood mitigation infrastructure, as described in subcomponent 3.2.

Subcomponent 1.2: Restoration of Roads and Allied Infrastructure. This subcomponent will support the rehabilitation and reconstruction of affected road network to improve accessibility to public facilities and to facilitate socio-economic revival of worst affected areas of the province. More specifically this component will include the following:

Road upgrading and rehabilitation in affected districts, including climate resilient designs, rehabilitation, maintenance and supervision of works in selected districts. Starting with a long list of roads to be shared by the GoS, final roads and districts will be prioritized for upgrading and rehabilitation based on the criteria that improving these identified roads would ensure all-weather access to public facilities. Improvement of road infrastructure would include but not limited to the raising of embankments, provision of side drains, improvement of culverts, ditches, vegetation, bridges, enhanced slope protection, adoption of design standards for pavements, and climate investments to mitigate effects of rainfall and high temperatures. In addition, the component will include green techniques, including use of vegetation, geomesh, gabions, pavement seals, etc., to mitigate effects of rainfall and high temperatures. Adaptation measures through resilience planning at the network level will ensure continuous access to schools, health facilities, and markets.

This subcomponent will also support improvement of road safety infrastructure and equipment in the vicinity of public facilities and marketplaces, including the provision of sidewalks, bike lanes, road markings, and signage. These improvements will also include the provision of traffic calming measures, i.e., rumble strips, marking of reduced speed zones, delineators, traffic lights, guard rails. In addition, it will also ensure inclusion of gender approach and universal access features and measures in the design, construction/rehabilitation, of roads and allied infrastructure. This subcomponent will consider the provision of basic fiberoptic infrastructure, i.e., ducts and manholes alongside selected roads to facilitate the expansion of internet connectivity in the future. This component will be implemented as per the telecom and digital plan of the GoS.

Subcomponent 1.3: Restoration of Water Supply Schemes. This subcomponent will fund the rehabilitation of selected and prioritized water supply infrastructure that has been destroyed or damaged by the floods. Early estimates of DNA for Sindh province will identify funds required for restoration of damaged water supply and sanitation infrastructure. Prior to floods, the damaged infrastructure was not providing safe water and hygienic sanitation. The project will upgrade the damaged infrastructure to provide safe and hygienic services and also reinforce flood resilience aspects in order to avoid future losses to calamities. Currently, a rural water supply and sanitation project is also under preparation which will cover the remaining portion of damaged infrastructure and at the same time, cater for new infrastructure, on need basis.

1.1.2 Component 2 – Livelihood Restoration

This component will support livelihoods through a ‘cash for work’ program for communities across affected villages, with a help of a Social Mobilization Partner (SMP). Cash for Work (CfW) programs are usually designed to assist the most affected, able bodied vulnerable communities so that they can quickly earn cash under ‘decent work’ conditions. Such support enables them to respond to their immediate livelihood needs (food, shelter, etc.), in return for participating in disaster clean up and restoration activities. Cash for Work interventions provide employment to unskilled and semi-skilled workers on labor intensive locally planned and executed projects, including rehabilitation of community infrastructure and irrigation systems, ecosystems and landscape restoration, soil conservation, and road construction and maintenance. The objectives of the CfW Program will be to:

- Provide income support to poor, vulnerable households through short term, intensive, semi-skilled and unskilled labor so they can meet their essential needs.
- Build or rehabilitate local level public/community assets and infrastructure to sustain urgent basic services such as clean water supply, sanitation, roads and other climate-resilient assets that strengthen the resilience of households and communities to climate risks.

Under this component, prioritization of beneficiaries will be done, following a three-pronged approach:

- *Severely impacted districts, talukas and union councils:* Based on GoS damage assessment, list of districts, along with talukas and unions councils (UC) within, will be prioritized to receive livelihoods restoration assistance in the first phase (six months). Once these areas have been served completely, the project will move into the remaining areas of Sindh.
- *Using National Socioeconomic Registry (NSER) Database for identification of poorest/vulnerable beneficiaries:* Within the prioritized areas, NSER data will be used to identify poorest beneficiaries at the village/neighborhood level. Where required, their eligibility will be cross referenced to the existing village/neighborhood level registry (prepared by GoS) or under the one that will have to be prepared under the Cash for Works component.
- *Preparation/using village level household registries to identify the poorest beneficiaries:* Most districts of Sindh (including the right bank) have benefited from GoS UC based Poverty Reduction Project, which conducted wellbeing and wealth ranking across every village, consolidating into a UC level database. This registry/database has households identified as

poorest and vulnerable by their own communities. The Project, with the help of a SMP, will seek communities' feedback to identify and confirm most deserving households (confirming the NSER and the wealth and wellbeing rankings) at the village/neighborhood levels. Where such information is not available, the SMP will generate the ranking in collaboration with the communities and maintain a registry.

Accordingly, an inclusive eligibility criterion will be developed and endorsed by the beneficiary community, which will prioritize the vulnerable groups. Attention will be given to women, elderly and differently abled who will be given the chance to nominate someone on their behalf to participate in the works and/or to receive inputs. At least 30% women participation will be guaranteed in suitable works (for example, general cleanup of the village, meal preparation for labor, making mosquito nets, quilts, etc.).

1.1.3 Component 3 – Institutional Strengthening for Resilience and Technical Assistance

Subcomponent 3.1: Expansion of Sindh Emergency Rescue Service. The Sindh Emergency Rescue Service (Rescue 1122) was established under SRP with the service operational as of May 2022, and is providing critical lifesaving, emergency response and rescue services to the citizens of Sindh. The service is currently partially functioning in selected districts including Karachi, Sujawal, Thatta, Hyderabad, Larkana, Dadu and Qambar Shahdadkot. Under SFERP, the service will be expanded to other districts as well as in existing districts as an integrated and independent service of first responders covering the entire spectrum of emergency response from floods, fires, earthquakes, windstorms, and health emergencies. Districts to be covered under SFERP include Jamshoro, Dadu, Thatta, Sujawal, Badin, Ghotki, Qambar Shahdadkot, Shikarpur, and Jacobabad, all of which have been badly affected by the floods of 2022.

Subcomponent 3.2: Enhancing Preparedness for Floods. This subcomponent will enhance the preparedness capacity of relevant line departments for better response, planning, and coordination for disaster management. Probable activities include: (i) the preparation of an emergency response plan at the operational level in Sindh; (ii) expansion of the decision support system (DSS) established under SRP to include flash floods, in addition to riverine floods; and (iii) design and implementation of mock drills to test the effectiveness of plans and standard operating procedures, along with early warning dissemination and first responder systems, in evacuation and early action, and also enhance community capacities by targeting and ensuring access to differently abled groups, livelihoods, sectors, etc.

Flood mitigation measures are effective when their design (and implementation) includes the right mix of structural and non-structural measures. Considering the two dimensions of risk: i) structural measures can reduce the probability of occurrence of large flooding; ii) non-structural ones can reduce the consequences of flooding. The main structural measure is flood storage capacity. Without flood storage capacity in the basin, the probability of occurrence of a flood above a certain level cannot be reduced. This sub-component will also support strategic long-term studies (feasibilities studies, consulting services for surveys, modelling, environmental and social assessments, etc.) for interventions related to increasing flood mitigation capacity in Sindh. In particular, the studies will focus on the knowledge and infrastructure gaps in the context of the rain and floods of 2022. Studies to inform the preparation of Bank's pipeline projects will also be supported. Specifically for flood management, activities will include i) flood forecasting and warning, and ii) flood emergency response planning (both being non-structural measures). Flood

forecasting systems can multiply the efficiency and capacity of flood mitigation dams, facilitating the following functions:

- Anticipation of reservoir depletion, with the objective of optimum flood routing when the flood will arrive at the reservoir.
- Coordination of the operations of all reservoirs in the basin during a flood event, with the objective of minimizing downstream damages.
- Establishment of alarm systems, to put in place the emergency response plans.

1.1.4 Component 4 – Project Management and Operational Costs

This component will finance the costs of the Project Implementing Units (PIU) and other operational costs at Sindh Irrigation Department (SID) and Planning and Development Department (formerly SRP-PDMA PIU), including, inter alia, project management, procurement, contract management, public outreach and dissemination, financial management (FM) activities, technical audits, compliance monitoring of construction activities, oversight of compliance with social and environmental standards, oversight of compliance with social inclusion targets, monitoring and evaluation (M&E) activities, and a Grievance Redress Mechanism (GRM). M&E entails, inter alia, preparation of project reports, including for mid-term and completion review, baseline studies and audits (financial and technical, environmental, social as needed). This component will also inter alia finance equipment (renting or purchase, as applicable), services and small works necessary for the effective functioning of the PIUs, such as vehicles, information and communication equipment (including laptops, printers etc.), office furniture and materials, renting of premises, upgrade/refurbishment works, etc.

1.1.5 Component 5 – Contingent Emergency Response

Following an adverse natural event that causes a major disaster or emergency, the Government may request the Bank to re-allocate project funds to support response and reconstruction. This component would allow the Government to request the Bank to reallocate financing from other project components to partially cover emergency response and recovery costs. This component could also be used to channel additional funds should they become available for such an emergency.

1.2. Potential Social and Environmental Impacts of the Project

The project interventions will have overall positive impacts through post-disaster recovery and rehabilitation activities and will strengthen the capacities and resilience of the GoS and communities to climate-related disasters. However, the contextual risks and potential environmental risks anticipated from the project investments are deemed substantial due to nature of the project design prepared in emergency, limited knowledge about the exact scale, design, and locations of project investments, institutional capacities of implementing agencies, and general implementation challenges. Component 1 will support multi sector rehabilitation and construction of infrastructure (medium to large scale) for which moderate to large-scale construction/civil works-related environmental risks and impacts are anticipated, such as pollution and nuisance (dust, noise, visual degradation of landscapes, debris, and other solid waste generation, potential ground/surface water contamination, community nuisance and safety concerns due to traffic increase), worker occupational health and safety (OHS), and concerns related to the spread of

waterborne diseases. Component 2 will involve minor civil works-related environmental risks as the interventions can have OHS and community health and safety (CHS) risks for communities, community workers, and those will be engaged in labor-intensive community rehabilitation/cleaning works. Component 3 will support the construction of rescue and response centers in a few districts; however, the anticipated civil works-related environmental risks anticipated are temporary and moderate to low-scale. The Project also includes retroactive financing of up to 40 percent of the loan amount for which environmental and social risks will be accounted retroactively through a third-party environmental and social audit.

Key social risks of the project are associated with exclusion of potential beneficiaries due to limitations in targeting mechanisms and elite capture, potential land, land use, livelihood impacts, labor and labor related occupational health and safety risks, and community health and safety risks. Beneficiaries selection for livelihood component and CfW program proposed under Component 2 is critical so as to avoid exclusion and elite capture. The primary risk to mitigate is incomplete or otherwise compromised identification of potential beneficiaries. Incomplete or poorly designed surveying, and poor records management can result in the most vulnerable segments of communities being overlooked during the targeting phase, excluding them from receiving benefits from the Project, and leading to disturbances in community dynamics, increased inequality, and additional marginalization of already marginalized groups. Other social risks of the project are associated with construction activities under Component 1, including OHS risks to community workers and project labor, traffic safety issues, temporary displacement of people, and impacts on cultural heritage due to flood related damages and associated rehabilitation works, if any.

SEA/SH risks associated with civil works and CfW activities are also substantial as women and children (especially minorities) are residing in insecure environment with limited access to privacy or safe toilet facilities etc. Such activities may result in the exploitation of economically disadvantaged or otherwise vulnerable individuals by project staff involved in the implementation of the programs, or by other project beneficiaries. Higher wages for workers involved in the CfW program may increase the demand for sex work and lead to an increase in exploitative transactional sex within communities. Early assessments also indicate rise in cases of child marriages for girls in flood affected areas, and project workers may exploit this situation.

2. Rationale and Objective of Stakeholder Engagement Plan

The SEP recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks.

The overall objective of this SEP is to define a plan of action for stakeholder engagement, including technically and culturally appropriate approach to public consultation and information disclosure, throughout the entire project cycle. The SEP outlines ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities.

The involvement of different stakeholders, including the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities.

This SEP will be reassessed and updated throughout the project life as a living document.

The SEP will:

- Establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.

3. Stakeholder Identification and Analysis

Stakeholder analysis identifies and determines the likely relationship between the project and the different stakeholders. Stakeholders are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. It is a useful tool for managing communication between the project team and stakeholders. Project stakeholders are defined as individuals, groups or other entities who:

- Are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and,
- May have an interest in the Project (‘interested parties’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

In all phases of the project, cooperation and negotiation with stakeholders is required. Persons within the groups who act as legitimate representatives of their respective stakeholder group and entrusted by their fellow group members will be identified in the process of engagement. Community representatives may provide helpful insight into the local settings and act as main means for dissemination of the Project information and as a primary communication/liaison link between the Project and targeted communities and their established networks. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way.

3.1. Methodology

Stakeholder analysis helps to know the perceptions, interests, need, and influence of actors on the project. Identifying the appropriate consultation methodology for each stakeholder throughout the project lifecycle is necessary. In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** public consultations for the project will continue during the whole project lifecycle from preparation through implementation. Stakeholder engagement will be free of manipulation, interface, coercion, and intimidation and discrimination of any kind;
- **Informed participation and feedback:** information will be provided and widely distributed among all stakeholders in an appropriate format; conducted based on timely, relevant, understandable and accessible information related to the project; opportunities provided to raise concerns and assure that stakeholder feedback is taken into consideration during decision making;
- **Inclusiveness and sensitivity:** stakeholder identification will be undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders will be encouraged to be involved in the consultation process. Equal access to information will be provided to all stakeholders. Sensitivity to stakeholders’ needs is the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups, particularly women headed households, youth, elderly and the cultural sensitivities of diverse ethnic groups. Given the

socioeconomic context of the province, special measures will be taken to provide access to information for illiterate, digitally deprived, and remotely located communities.

3.2. Stakeholders Identified

For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

1. Affected Parties
2. Other Interested Parties
3. Disadvantaged/Vulnerable Individuals or Groups

3.2.1 Affected Parties

Affected Parties are those groups of people likely to be affected by the Project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities. Specifically, the following individuals and groups fall within this category:

Table 1 - List of Affected Parties

Community	Affected Parties	Impact Level
	1. Villagers and residents of towns who lost their houses, crops and other assets, and livelihoods	1. High
	2. Agriculture farmers and workers	2. High
	3. Farmers Organizations/ Water Users Associations	3. High
	4. Livestock/dairy farmers	4. High
	5. Fishing community	5. High

3.2.2 Other Interested Parties (OIPs)

OIPs in the Project are individuals, groups, or organizations with an interest in the project, which may be because of the Project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations and cultural groups. The following OIPs have been identified as stakeholders of the Project:

Table 2 - List of Other Interested Parties

Sector	Other Interested Parties (OIPs)	Impact Level
Government	1. National Disaster Management Authority (NDMA)	1. High
	2. Federal Flood Commission	2. Low
	3. Pakistan Meteorological Department	3. Low
	4. Indus River System Authority	4. Low
		5. High
		6. Medium
		7. Medium

5. Politicians (local leadership in affected areas)	8. Low
6. Federal Ministry of Water Resources	9. Medium
7. Federal Ministry of Food Security	10. Low
8. Economic Affairs Division	11. Low
9. Social Protection Unit and Social Welfare Department, Sindh	12. Medium
10. Sindh Police Department	13. Medium
11. Federal Ministry of Climate Change	14. Medium
12. Social Welfare Department, Sindh	15. High
13. Revenue Department, Sindh	16. High
14. Pakistan Meteorological Department	17. High
15. Irrigation Department	18. High
16. Agriculture, Supply and Prices Department	19. High
17. Livestock & Fisheries Department	20. Low
18. Provincial Disaster Management Authority, Sindh	21. High
19. Food Department	22. Medium
20. Health Department	23. High
21. Public Health Engineering & Rural Development Department	24. Low
22. Local Government Department	25. High
23. School Education & Literacy Department	
24. Environment, Climate Change & Coastal Development Department	
25. P&DDs	

Community

1. General Public	1. High
2. Local NGOs involved in disaster response work	2. High
3. Donor organizations	3. High
4. Charity groups	4. High
5. Sindh Abaadgar Board	5. High
6. Contracted workers, consultants	6. Low

Others

1. Pakistan Cotton Ginners Association	1. High
2. Rice Exporters Association of Pakistan	2. High
3. The All Pakistan Fruit & Vegetable Exporters, Importers &	3. Low
	4. Low
	5. Low
	6. High

	Merchants Association (PF VA)	7. High
		8. Low
4.	All Pakistan Textile Mills Association	9. High
		10. Low
5.	Pakistan Sugar Mills Association	11. Medium
		12. High
6.	Private sector companies providing agriculture inputs/ support:	13. Low
		14. High
7.	Seed producers/suppliers	15. Medium
		16. Medium
8.	Pesticide manufacturers	17. Low
9.	Fertilizer manufacturers	18. Low
10.	Agriculture equipment / machinery manufacturers	19. Low
11.	Construction contractors	20. Medium
12.	Property dealers	21. High
13.	Construction material suppliers	22. High
		23. Low
14.	Insurance companies	24. High
15.	Cargo Companies	25. Medium
16.	Public Transporters	26. High
17.	Pakistan Pharmacist Association	27. High
		28. High
18.	Telecommunication companies	29. Medium
		30. High
19.	Courier Service Companies	31. High
		32. High
20.	Goods Transporters Association	33. High
21.	Sindh Balochistan Rice Millers and Traders Association	34. Medium
		35. High
		36. Medium
22.	Dates processing unit owners	37. Medium
		38. High
23.	Mango Growers Association	39. High
		40. Medium
24.	Sugarcane Farmers associations	41. High
		42. High
25.	Traders Associations	43. High
26.	Shop Keepers	44. High
27.	Daily wage earners	45. Medium
28.	Livestock and dairy Traders	
29.	Poultry farmers and poultry traders	
30.	Seed, Fertilizer and Pesticide Dealers	
31.	Agriculture Machinery Owners	
32.	Artisans of rural markets	
33.	Road side and street vendors	
34.	Orchard contractors	
35.	Micro-Finance Institutions (Banks/NGOs)	

36. Sindh Goods Transporters Association
37. Fish Farm Owners
38. Veterinary service providers
39. Middle men in markets
40. Associations/groups/organizations representing groups above e.g., livestock, fishery, etc.
41. UN Agencies (e.g., WHO, WFP, UNICEF)
42. Media Groups
43. Sindh Culture Department
44. Cultural Organizations, writers, archeologists
45. Universities and research institutions, e.g., Mehran University, Jamshoro; Sindh Agriculture University; International Water Management Institute

3.2.3 Disadvantaged/Vulnerable Individuals or Groups

Disadvantaged or vulnerable individuals or groups are those peoples or groups highly vulnerable to potential project impacts and often do not have a voice to express their concerns or understand the impact and risk of the project. They may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status, and usually require special arrangement to ensure their equal representation in the consultation and decision-making process associated with the project. Their vulnerability may stem from person's origin, gender, age, health condition, disability, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., ethnic and religious minority groups, Indigenous peoples), dependence on other individuals or natural resources, etc.

Awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups on the project must consider such groups' or individuals' sensitivities, concerns and cultural differences to ensure a full understanding of project activities and benefits. Engagement with these vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders. These measures may include tailored consultations in local languages, consultations held close to the residences and easily accessible to all vulnerable groups, and other targeted strategies. Additionally, vulnerable groups will be consulted with regularly throughout the life of the Project, as described in Section 4.3.

Within the proposed Project, the vulnerable or disadvantaged groups may include, but not limited to, the following:

Table 3 - List of Disadvantaged/Vulnerable Groups

<i>Sector</i>	<i>Disadvantaged/Vulnerable Individuals or Groups</i>	<i>Impact Level</i>
---------------	---	---------------------

Community		
	1. Women agriculture and livestock farmers	1. High
	2. Pastoralists	2. High
	3. Ethnic/religious/gender minorities	3. High
	4. Elderly people in hard-hit areas and facing food shortages	4. High
	5. Female headed households	5. High
	6. Lactating mothers and pregnant women	6. High
	7. Children and youth heads of households	7. High
	8. Agriculture labor dependent on share-cropping (<i>Haaris</i>)	8. High
	9. Communities practicing subsistence farming	9. High
	10. People with special needs such as Pregnant women, children, those in poor health	10. Medium
	11. Illiterate persons	11. High
	12. Women Artisans (handicraft makers etc.)	12. High
	13. Differently abled/physically challenged people	13. Low
	14. Infants/children	14. High
	15. Local folk artists	15. High
	16. Casual/Informal labor force (domestic workers, construction workers, bus conductors etc.)	16. High

Vulnerable groups within the communities affected by the project will be further confirmed and consulted during Environmental and Social Assessment preparation through dedicated means, as appropriate.

4. Stakeholder Engagement Program

4.1. Summary of Stakeholder Needs, Methods, and Tools for Engagement

Strong citizen and community engagement are preconditions for the effectiveness of the project. Accordingly, different tools, techniques and methods will be used for engagement to cover different needs of the stakeholders. Given the nature of the project, the strategy for stakeholder engagement is heavily focused on on-going information disclosure and dissemination that is efficient, transparent, and addresses the needs of different stakeholders.

The following are some considerations for selecting channels of communication:

- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Local Sindhi tv/radio channels and newspapers will be preferred. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators. Communities in the affected areas specially those who have limited access to information for being cut off due to flood, will be consulted in-person through multiple methods e.g. Focus Group Discussions, individual interviews of physically challenged people, women in special needs (pregnant, lactating), elderly people and transgender. Occupational groups such as farmers, fisher people, laborers will be consulted through separate focus group discussions
- Communities in the affected areas specially those who have limited access to information for being cut off due to flood, will be consulted in-person through multiple methods e.g., Focus Group Discussions, individual interviews of physically challenged people, women in special needs (pregnant, lactating), elderly people and transgender. Occupational groups such as farmers, fisher people, laborers will be consulted through separate focus group discussions
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.
- Structured interviews will be used to engage with government officials/departments and relevant NGOs
- Village Communities: Communities in the affected areas specially those who have limited access to information for being cut off due to flood, will be consulted in-person through multiple methods e.g., Focus Group Discussions, individual interviews of physically challenged people, women in special needs (pregnant, lactating), elderly people and transgender.

In order to reach out to all these groups of stakeholders a team will be engaged. Cultural norms will be fully respected. For participation of communities and other local stakeholders, information of these consultation sessions will be disseminated through local contacts, social

media and other means of local communication. Consultations will be conducted by experienced experts having understanding of local context. All discussions/interviews with local stakeholders will be conducted in Sindhi (or any other local language of the community). Women team members will consult women to ensure their comfort. All consultations will also be recorded with prior permission of the concerned stakeholders. Formal permission will be sought before taking photographs.

To assess more specific needs of different communities in different areas stakeholders' consultations will be conducted. The following methods and tools will be used:

Table 4 - Stakeholder Engagement Approaches, Needs and Methods

<i>Stakeholder type</i>	<i>Characteristics</i>	<i>Engagement Approaches</i>	<i>Specific needs</i>	<i>Methods for Disclosure</i>
FOs, WUAs, Sindh Abadgar Board, Agriculturist Associations, Citizens groups and other civil society organizations etc.	Collectives or associations of farmers. These may range from community to provincial level and are likely to have diverse membership.	<p>Correspondences (Phone, Emails); Distribute information to Government officials, NGOs, Local Government, private sector and other organisations/agencies Invite stakeholders to meetings and follow-up</p> <p>Project website; Present project information and progress updates Disclose ESIA, ESMP and other relevant project documentation</p> <p>Visibility/ Signage; Share information door-by-door, respecting social distancing, on project activities; project investment location; project disclosure; Educational materials</p> <p>Project leaflet, Brief project information to provide regular update Site specific project information.</p> <p>Mass media (TV, radio, print and electronic newspapers, social media) Communication channels with the public to disseminate situation reports, latest information</p>	<p>Engagements should be in person, and in FGD format when consulting with large groups.</p> <p>Engagement using Sindhi languages will be more important for consultation with these groups</p> <p>Supplemental engagement through project website, leaflets, mass media, and mobile phones.</p>	<p>One-on-one or group meetings, FGDs</p> <p>Sindhi print, electronic, and broadcast media</p> <p>Training workshops</p> <p>Leaflets, reports, and brochures.</p> <p>The project website</p>

		on floods, and project activities. Local Sindhi media will also be used for mass communication.		
Other Influential Parties	Stakeholders not directly involved in or affected by project activities, but may be consulted for technical support or collaboration during the design and implementation of the project.		Correspondence via email and phone, and in-person individual or small group interviews/meetings are appropriate. For national level institutions/groups, Urdu is appropriate. For sub-district level institutions, engagement should be conducted in Sindhi	The project website Sindhi print, electronic, broadcast, and social media
Disadvantaged/vulnerable individuals directly involved in project implementation	Women, differently-abled people, fishing community, elder people, women heading households	Focus group meetings; For communities, farmers organizations/groups, women beneficiaries, disadvantaged/vulnerable individuals/groups Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses	Engagement should be conducted in a culturally appropriate manner. Female interviewers/facilitators should be employed when respondents are also female. Interviews should be conducted at village/household level. Interviewees should not be obliged to travel. Physical accessibility requirements of interviewees should be considered before organizing interviews. Supplemental engagement through project website, GRM. Sindhi (or Seraiki at some places)	Outreach through local community organizations Community information sessions/workshops Public notices/signage Print, electronic, and broadcast media.

			language will be used for consultation.	
Farmers, fisher persons, small business owners	Farmers/fisher persons who have been affected due to flood.	<p>Focus group meetings; For communities, farmers organizations/groups, women beneficiaries, disadvantaged/vulnerable individuals/groups Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses</p>	<p>Local cultural contexts must be considered prior to engagement. When possible, engagements should be timed to avoid disruption of livelihood activities (e.g., not during morning hours when they are busy in their fields). Face-to-face interviews are preferable. Awareness raising through appropriate signage, leaflets, mobile phone, and mass media. Consultations should be in local language.</p>	<p>Outreach through local community organizations Community information sessions/workshops Public notices/signage Print, electronic, and broadcast media.</p>
Women farmers and farm labor	Women who are directly or indirectly engaged in agricultural activities and affected due to flood.	<p>Focus group meetings; For communities, farmers organizations/groups, women beneficiaries, disadvantaged/vulnerable individuals/groups Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses</p>	<p>Local cultural contexts must be considered and respected. Female interviewers should be used. Interview locations should be flexible to ensure representation. Participants should not be obliged to travel long distances. Face-to-face interviews should be preferred, when possible, as telecommunication access can vary significantly between stakeholders.</p>	<p>Community information sessions/workshops FGDs will be conducted Semi structure interviews Outreach through local community organizations Public notices/signage Print, electronic, and broadcast media.</p>

			<p>Awareness raising through appropriate signage, leaflets, mobile phone, and mass media.</p> <p>Consultation with these groups should be in local language</p>	
Illiterate people	Individuals or flood affectees who are illiterate	<p>Focus group meetings; For communities, farmers organizations/groups, women beneficiaries, disadvantaged/vulnerable individuals/groups Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses</p>	<p>Outreach, awareness raising, and capacity building activities involving this group should be sensitive to their literacy needs.</p> <p>Engagement should be face-to-face when possible.</p> <p>Awareness raising should not require literacy, preference to be given to voice phone calls, visual media (e.g., posters with simplified, intuitive graphics, video clips, etc.).</p> <p>Consultations with these groups should be held in local language</p>	<p>FGDs will be conducted Semi structure interviews</p> <p>Community information sessions/workshops</p> <p>Outreach through local community organizations</p> <p>Public notices/signage</p> <p>Print, electronic, and broadcast media.</p>
Persons with disabilities	Physically challenged people who are affected due to flood	<p>Focus group meetings; For communities, farmers organizations/groups, women beneficiaries, disadvantaged/vulnerable individuals/groups Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses</p>	<p>Physical accessibility of interview locations should be considered prior to arranging engagement. Participants should not be required to travel long distances, and should be given the option to be interviewed at home or via phone when possible.</p>	<p>Community information sessions/workshops</p> <p>FGDs will be conducted Semi structure interviews</p> <p>Outreach through local community organizations</p> <p>Public notices/signage</p>

			<p>Awareness raising through appropriate signage, leaflets, mobile phone, and mass media.</p> <p>Consultations with these groups should be held in local language</p>	<p>Print, electronic, and broadcast media.</p>
Sharecroppers	<p>Individuals engaged in farming who do not own the land they farm</p>	<p>Focus group meetings; For communities, farmers organizations/groups, women beneficiaries, disadvantaged/vulnerable individuals/groups Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses</p>	<p>Interview locations should be flexible to ensure representation. Participants should not be obliged to travel long distances.</p> <p>Face-to-face interviews should be preferred, when possible, as telecommunication access can vary significantly between stakeholders.</p> <p>Awareness raising through appropriate signage, leaflets, mobile phone, and mass media.</p> <p>Consultations with these groups should be held in local language</p>	<p>Community information sessions/workshops</p> <p>FGDs will be conducted Semi structure interviews</p> <p>Outreach through local community organizations</p> <p>Public notices/signage</p> <p>Print, electronic, and broadcast media.</p>

4.2. Proposed Strategy for Information Disclosure and Consultation Process

The Project will strategize and implement communications, engagement and social accountability to conduct effective consultations with the local community members and other concerned stakeholders using communication channels outlined above as deemed appropriate. The SEP will serve as a precursor and a guiding document for this Component and will be refined as the project progresses.

During preparation and implementation of cash for work (CfW) schemes and livelihood restoration communities will be consulted, and their full participation will be sought. In addition, consultations will be conducted during the preparation of ESMF/ESIAs/ESMPs. The draft and final ESMF/ESIAs/ESMPs and SEP will be disclosed prior to formal consultations.

The approaches taken will ensure that information provided is meaningful, timely, and accessible to all affected stakeholders. Use of local language including addressing cultural sensitivities, as well as challenges deriving from illiteracy or disabilities, tailored to the differences in geography, livelihoods and way of life will be taken into consideration. The project will also ensure the establishment of a Grievance Redress Mechanism (GRM) that is accessible to all project stakeholders and beneficiaries.

4.3. Proposed Stakeholder Engagement Plan

The table below proposes stakeholder engagement activities for the implementation stage. This SEP will be updated with more specific details on consultations as required.

Table 5 - Stakeholder Engagement Plan

<i>Stakeholder</i>	<i>Topics of Engagement</i>	<i>Engagement Methods</i>	<i>Location/Frequency</i>	<i>Responsibility</i>
Flood affected communities	Awareness raising about project benefits	In-community FGDs	FGDs to be conducted with beneficiary communities twice a year for each subproject during implementation.	PIUs
	Disclosure of ESMF and related E&S instruments	Mass media and social media		
	Guidance on participating in the Project (particularly on CfW and emergency support components) ⁶			
	Guidance on utilizing the Project GRM			
	Progress updates		Mass media/social media campaigns for awareness raising to be implemented continuously	

⁶ For Component 2 (Livelihoods Restoration) which will include CfW and emergency support to livestock farmers, a separate manual (the CfW Manual) will be prepared. The CfW Manual will include structural and procedural details on implementing the component, upon which the relevant stakeholder engagement with flood affected communities will be based. This SEP will be updated upon preparation of the CfW Manual.

	Feedback on Project implementation		throughout the life of the Project.	
PIU staff (field level)	Beneficiary targeting and prioritization	Workshops	Workshops with PIU staff to be conducted quarterly during Project implementation	PIUs
	Implementation of E&S instruments			
	E&S issues identified during Project implementation			
	Progress updates			
	Feedback on Project implementation			
Provincial government departments outside of the Project involved in flood response	Awareness of Project design and implementation	One-on-one discussions	Targeted for strategic discussions annually during Project implementation	PIUs
	Disclosure of ESMF and related E&S instruments	Workshops		
	Progress updates			
	Feedback on Project implementation	Virtual correspondence		
Ethnic, religious minority communities and other vulnerable groups	Awareness raising about Project benefits	In-community FGDs	In-community consultations and FGDs to be conducted near to their houses and easily accessible for person with disability and elderly person.	PIUs
	Disclosure of ESMF and related E&S instruments	Mass media and social media		
	Guidance on participating in the Project and availing Project benefits	Targeted outreach for awareness raising through community organizations		
	Guidance on utilizing the Project GRM			
	Progress updates		Targeted outreach to be carried out prior to initiating each subproject.	
	Feedback on Project implementation			
FOs, WUAs, and other organizations/collectives representing farmers	Awareness raising of Project benefits	Workshops	Workshops and FGDs to be conducted twice annually for each subproject	PIUs
	Disclosure of ESMF and related E&S instruments	FGDs		
	Guidance on participating in the Project	Mass media and social media		
	Progress updates		Mass/social media campaigns to be implemented continuously	
	Guidance on utilizing the Project GRM			

	Feedback on Project implementation		throughout the life of the Project	
Women's FOs, and other women's organizations	Awareness raising of Project benefits	Workshops	Workshops and FGDs to be conducted twice annually for each subproject	PIUs
	Disclosure of ESMF and related E&S instruments	FGDs		
	Guidance on participating in the Project	Mass media and social media		
	Progress updates			
	Guidance on utilizing the Project GRM with special emphasis on reporting and resolving cases of GBV, SEA/SH.			
	Disclosure of and guidance on the GBV Action Plan.			
	Feedback on Project implementation			
NGOs and CSOs working with flood affected communities	Awareness of Project design and implementation	Workshops	Workshops/FGDs to be conducted twice annually for each subproject	PIUs
	Beneficiary targeting and prioritization	FGDs		
	E&S issues identified during Project implementation	Virtual correspondence		
	Progress updates			
	Feedback on Project implementation			
LSOs and other groups/collectives representing flood affected communities	Awareness raising of Project benefits	Workshops	Workshops/FGDs to be conducted twice annually for each subproject	PIUs
	Beneficiary targeting and prioritization	FGDs		
	Disclosure of ESMF and related E&S instruments	Mass media and social media		
	Guidance on participating in the Project			
	Progress updates			
	Guidance on utilizing the Project GRM			
	Progress updates			

	Feedback on Project implementation			
Research and academic organizations	Awareness of Project design and implementation	Workshops	Workshops/FGDs to be conducted twice annually for each subproject	PIUs
	Beneficiary targeting and prioritization	FGDs		
	Disclosure of ESMF and related E&S instruments	One-on-one correspondence		
	E&S issues identified during Project implementation			
	Progress updates			
	Feedback on Project implementation			

4.4. Reporting Back to Stakeholders

Stakeholders will be kept informed as the project develops, taking into consideration relevant COVID -19/communicable diseases guidelines and restrictions. All relevant project information such as implementation progress, environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism will be provided. This will be important for the wider public, but specifically critical for the directly impacted community members.

New technologies such as satellite maps, drones, GPS enabled cameras and meta-data analysis and climate information for flood risk mapping will be used to prepare communication material.

4.5. Summary of Stakeholder Engagement During Project Preparation

Detailed stakeholder engagement was carried out during Project preparation. A three-tier approach to capture stakeholder opinions and recommendations from the national to the community level was followed, as noted below:

- **National level**– These consisted of two high-level working group discussions (described in Section 4.5.1) with notable “opinion influencers” from the provincial and national arena. The discussions focused individually on technical, and social contexts related to the 2022 floods, and were conducted before engaging with the flood affected communities, with the purpose of guiding those engagements.
- **Regional level** – Three regional level workshops were conducted with stakeholders, covering the north, central, and south regions of the province. These workshops involved discussions with government, community, and other regional/district level institutions who were affected by the floods, or were directly involved or otherwise interested in the flood relief and rehabilitation efforts. Details are provided in Section 4.5.2.
- **Community level** – In-field consultations were also carried out with a number of communities in affected areas of the province. Details of these consultations are provided in Section 4.5.3.

Table 6 - Overview of Stakeholder Engagement during Project Preparation

<i>Level of Engagement</i>	<i>Details of Engagement</i>	<i>District</i>	<i>Date</i>	<i># of Participants</i>
National	Technical Working Group	Islamabad	9 Dec, 2022	8
National	Social Working Group	Islamabad	9 Dec, 2022	12
Regional	North Regional Workshop	Sukkur	10 Jan 2023	35
Regional	Central Regional Workshop	Jamshoro	14 Dec 2022	45
Regional	South Regional Workshop	Umarkot	13 Jan 2023	65
Community	Female community members – Miani Mallah	Jamshoro	13 Dec 2022	26
Community	Male community members – Miani Mallah	Jamshoro	13 Dec 2022	10
Community	Male community members – Sawan Khan Panhwar	Jamshoro	13 Dec 2022	30
Community	Residents of village Gajidero	Larkana	15 Dec 2022	8
Community	Female Community Members – Jam Khan Jatoi	Khairpur	16 Dec 2022	20
Community	Male community members – Jam Khan Jatoi	Khairpur	16 Dec 2022	12
Community	Male community members – Achlo Kolhi	Umarkot	13 Jan 2022	7

4.5.1 High-Level Working Groups – December 9th 2022

To gain a high-level understanding of the impacts of the 2022 floods on the province, and to draw from lessons learned from the 2010 floods, two working groups were convened in Islamabad on December 9th 2022. The participants of each working group were prominent members of Sindh civil society, and included academics, journalists, NGO/CSO leaders, technical experts, and former government officials.

The first working group focused on the technical aspects of the Project and invited participants to share their experiences of the 2010 and 2022 floods, what worked and what did not work, ideas on flood resilient infrastructure development, strategies for delivering effective flood management in Sindh, institutional arrangements for effective delivery, and overall recommendations for the Project.

The second working group focused on the social aspects of the Project: livelihoods, social protection, and housing. It aimed to get an understanding of experts' expectations from the livelihood component of the Project, particularly with regards to design, implementation strategies, transparency, and effectiveness.

Both working group sessions introduced the participants to the project, following which the first session was used to present a set of questions for participants to respond to individually. For the social working group, these questions focused on inclusion and transparency, prioritization, and effective stakeholder engagement, while for the technical group the questions were framed around building back better, prioritization of infrastructure interventions, and stakeholder engagement.

The second session of each working group divided the participants into small groups of 3 to 4, and required participants to provide written feedback and recommendations by answering a set of questions that were thematically related to the discussion points introduced in the first session.

Table 7 - Stakeholders Consulted - Working Groups

Stakeholders Consulted

Former Secretary, Sindh Irrigation Department
Economist and Former advisor to Sindh Chief Minister
Former Chairperson of Sindh Planning and Development Department
Senior irrigation engineer and former Chairman of Indus River System Authority
Professor at Sindh Agricultural University
Chief Engineer, Sindh Irrigation Department
Irrigation expert and academic
Chief executive of Sindh Rural Support Programme
Economist and Former Director General of Federal Ministry of National Food Security and Research
Executive Director of Indus Resource Center
Journalist and Former Special Assistant to CM Sindh
Vice Chancellor, Sindh Agricultural University
CEO, Health and Nutrition Society
Former Provincial Secretary of the Government of Sindh

Summary of Discussion - Technical Working Group

• Infrastructure Needs

- Participants pointed to the topography and associated drainage capacity of the province, noting this as a key contributing factor to damages and losses faced, irrespective of the root cause of the flooding.
- The workshop revealed a general consensus on storm drainage systems as being a critical need for the province.
- The right-bank was identified as a key area in which to improve drainage. Participants suggested that a massive mapping exercise be carried out to pinpoint the reasons why water from the right-bank did not drain away through the Indus.
- Irrigation networks are not flood responsive, and work on improving efficiency and remodeling/rehabilitating canals should be put on hold, with the focus shifted to improving the resilience of the networks.
- The Left Bank Drainage Outfall (LBOD) was identified as a key contributing factor to the devastation caused by the floods. Participants suggested a shift in focus to redesign the LBOD to allow it to function as originally designed, extending to further districts in northern Sindh and initiating similar works on the right-bank as well.
- Sindh's drainage system was designed for agricultural runoff, and not for flood waters. The capacity of the drainage network should be redesigned to allow for greater capacity (and correspondingly, improved flood resilience). These measures should extend to all levels of the drainage network, including the LBOD and RBOD.
- The RBOD project has stagnated and needs to be completed as soon as possible to allow for additional drainage capacity
- Removing encroachments from natural waterways to ensure smooth drainage of flood water

• Preparation and Response in 2022

- Participants agreed that lessons from the 2010 floods either did not translate into on-ground actions, or were not adequately implemented. Inundation on the right-bank of the Indus which occurred both in 2010 and 2022 was proposed as evidence that while the causes of the two floods were different (2010 was a riverine flood, while 2022 was caused by hill torrents from the Kirthar range), the lack or inability of drainage infrastructure on the right-bank has been a known issue for over a decade.

• Recommendations for Prioritization

- Early warning systems should be installed in the hilly regions to the west of the province, including meteorological stations, and timely sharing of information with provincial authorities ensured.
- Participants suggested that the Project should prioritize facilitating the timely sharing of rainfall information between the governments of Balochistan and Sindh.
- Investments to increase the capacity of Manchar Lake to absorb torrential inflows, and for developing infrastructure to increase discharge from Manchar during high floods.
- Housing projects should be coupled with communal infrastructure to be built by communities based on the principles of resilience on raised grounds with water and sanitation facilities available.
- Activities to work on the improvement of the drainage network within the province should be prioritized, as this is the greatest contributing factor to flood risk
- **Stakeholder Engagement, Inclusion and Transparency**
 - CSOs and academia should be represented in steering groups, ensuring the participation of women and minority/vulnerable groups.
 - In the future, if breaches are required to manage floods, the points for the breaches should be identified in advance, and residents of the potential inundation areas should be notified with ample time to evacuate.
 - Drainage channels should be developed to avoid inundation of vast areas in the event that breaches are required for flood management.
 - Early warning systems should be designed in an inclusive way to ensure that information is easily available for all
- **Recommendations for Building Back Better**
 - Ring roads with height greater than the high flood level should be built around all flood prone cities, and pumping stations provided.
 - Reconstructed or rehabilitated roads should be constructed on embankments with culverts provided for cross drainage. Similarly, flood prone roads should be retrofitted with culverts where possible.
 - Climate resilient crops should be introduced and climate-smart agriculture practices should be promoted.
 - Discourage rebuilding of villages and homes on flood prone areas, and consolidate small settlements into villages built on high ground.
 - Small distributed settlements in the province must be consolidated into larger villages to improve efficiency of Project investments
 - Data sharing and coordination between the Sindh and Balochistan provincial governments, and between departments within the Sindh government needs to be improved for better emergency response, and better management of resilience activities.

- Action is required to remove encroachments on the riverine belt and natural water ways. Houses and other structures built on these natural drainage routes hinder the flow of water causing flooding upstream.
- Both the right and left-bank need to be mapped to manage flows in the future. Similarly, the province needs to be mapped in detail, and updated flood and drought risk maps should be developed. Similarly, drainage infrastructure, water supply, and roads should be mapped and incorporated into risk assessments, flood forecasting studies, and climate models.
- Management and institutional capacity of provincial departments, including SID, PHED, DDMA and local government needs to be expanded in order to manage flood protection infrastructure improved by the Project more effectively
- The Project should reserve a percentage of the total budget for research and design to prepare for future flood resilient investments.
- Designers of activities focused on drainage infrastructure should take into account the unprecedented intensity of the rainfall preceding the 2022 floods, and models should be updated to reflect these realities
- A comprehensive Lower Indus Basin Flood Management Plan should be developed/updated on the basis of earlier conducted studies
- Functionality of pumping facilities should be ensured by proper design/construction and ensuring availability of power backup facilities
- Rescue services should be strengthened through professionally trained and equipped staff in all flood prone areas
- Local level disaster response centers should be established where trained disaster response teams should be deployed

Summary of Discussion – Social Working Group

- **Stakeholder Engagement, Inclusion and Transparency**
 - Project activities, especially CfW should cater to the needs of women who may not be able to participate in all types of activities either due to physical or cultural barriers.
 - When assessing the needs of stakeholders for project interventions, the Project must ensure that women’s voices are heard, as their needs may be very different from men’s needs in a post-disaster setting.
 - Women may be employed through CfW for in-home or lightly physical activities like kitchen gardening, providing training to communities, afforestation, etc.
 - CfW must also provide engagement mechanisms for PWDs and children heads of households who may not be able to engage in CfW activities due to physical inability, or child labor laws.
 - Cash transfers for CfW should be done digitally to ensure transparency and avoid misappropriation of funds.

- Monitoring for the Project is essential and must be done by a competent third party. Some participants suggested involving academic institutes and CSOs in monitoring and reporting.
 - Stakeholders should be informed of any Project interventions in advance, and should be consulted prior to finalizing any community level interventions.
 - Thorough public disclosure and consultation should be done for all subprojects to ensure transparency
 - Elite capture is a significant risk, and should be mitigated by implementing robust monitoring protocols, with a maximum use of technology to avoid instances of misappropriation or tampering of data.
 - Local UC level CSOs should be engaged periodically throughout implementation of the Project to stay up to date with progress and issues being faced by the communities.
 - Political office holders should not be involved in the governance or management of the Project activities.
- **Recommendations for Prioritization**
 - The group most in need of assistance are people that have lost crop, agriculture, and other assets as this leaves them without means of livelihood. Within this group, women, especially women heads of households, and people with disabilities are the most vulnerable.
 - Project activities should cater to the needs of marginalized groups, particularly ethnic and religious minorities
 - Landless farmers and agricultural labor (tenants, sharecroppers, daily wage workers) also constitute an important group in need of assistance.
 - CfW activities should focus on works that will alleviate losses of latrines, kitchens, animal pens, and community level infrastructure.
 - The poverty scorecard approach should be used to identify the neediest beneficiaries for CfW and livelihoods support sub-projects. This should form part of needs assessments that should be conducted at the community level, since different communities will have different needs.
 - The needs assessment should be carried out, keeping in mind that the floods will have pushed persons into poverty that may not have been reflected in previous assessments or in existing datasets.
 - Community skill building should be a secondary aspect of the CfW activities to improve their livelihood capacity and resilience.
 - Work should be done on digitizing land records and mapping the flood prone areas of the province so that in the future, prioritization can be enhanced through the use of geo-spatial analyses.
 - The process of beneficiary selection and prioritization should be made public

- In many villages, lack of functional water and sanitation schemes is a significant challenge, especially for women. WASH should be a top priority when designing CfW programs.
- **General Recommendations for Implementing the Project**
 - In addition to rehabilitating flood damages, CfW programs should also aim to improve situations that have held communities back in the past, e.g., defunct or damaged schools and other service provision outlets
 - CSOs/community level implementing partners for livelihoods activities will not have the capacity to manage the allocation and distribution of project benefits. These groups should be trained, especially on monitoring and reporting.
 - The Project should consider alternatives to CfW, e.g., attaching a housing component to the livelihoods work to support communities to rebuild damaged or destroyed homes; providing productive assets in lieu of cash, providing stipends to encourage continuity of learning for children, etc.
 - CfW activities should be carefully developed so that resources are not being used to build unneeded or unnecessary infrastructure.
 - Schools and continuity of education should also be a focus.
 - Delivery of livelihoods support must be data-driven, and must involve organizations with a deep presence in the beneficiary communities to strengthen credibility and trust.
 - Mental health counseling services should be supported by the project

4.5.2 Regional Workshops

Following the two working group sessions, field consultations were carried out covering a selection of districts across Sindh. Three regional workshops were conducted, each with participants from the respective region. These workshops were conducted with activists, journalists, CSOs, NGOs, academics, farmers, growers, businesspersons, representatives of community groups, provincial, district and local government representatives, and other institutional stakeholders. Special attention was given to ensure participation of women and religious minorities.

Table 8 - Summary of Regional Workshops

<i>Location</i>	<i>Region Covered</i>	<i>Date</i>	<i>No. of Participants</i>
Sehwan	Central	14 Dec 2022	45 (40 men, 5 women)
Sukkur	North	10 Jan 2023	35 (24 men, 11 women)
Umarkot	South	13 Jan 2023	65 (55 men, 10 women)

The objectives of the regional workshops were primarily to hear from stakeholders that had been involved in the ongoing flood relief efforts to gain an understanding of the challenges faced, and specific needs for support in the flood affected areas. The workshops also aimed to provide recommendations for the implementation of the Project.

Summary of Discussion – Regional Workshops

- **Experiences and Challenges from the 2022 Floods**

- Informal early warning systems (e.g., social media, mobile chat groups) were used in many communities and were more up to date than formal early warning systems.
- Disease management is a challenge, many flood affected communities are at risk of malaria, diarrhea, and other illnesses related to standing water
- Water supply/access to clean drinking water is a major challenge at flood affected areas. In many areas there is a severe shortage of agricultural water, directly impacting peoples' livelihoods.
- Cotton was among one of the most severely affected crops—the floods arrived at the time of harvesting.
- Schools and continuity of education is a significant issue. Schools are missing basic facilities including furniture and chairs, books and building structures have been damaged.
- Illegal occupation/encroachments along natural water ways have made the impact of the floods worse.
- Damages to local road networks have hindered peoples' access to basic services, e.g., health, education, market.
- Verifying ownership of property is challenging and makes it difficult to determine exactly who the beneficiaries should be particularly for projects that aim to restore housing and livelihoods.
- Even pre-floods, there is a significant absence of social safety nets and programs. Currently BISP is the largest one with widest coverage, but for different reasons, the coverage is not complete and many needy households are not registered, sometimes due to lack of documentation, other times lack of understanding on eligibility and registration requirements.
- Health and nutrition, particularly for children, is an ongoing issue that is greatly exacerbated by the floods.

- **Beneficiary Selection, Monitoring, and Transparency**

- Committees should be formed at the Taluka and UC level, which should include cross cutting members including teachers, CSOs, GoS. These committees should support the identification of beneficiaries in each locale and supervise the payment process.
- Participants generally agreed that the poorest households should take priority for livelihood activities, including cash-for-work. Participants also agreed that the challenge would be in identifying these households at the village level, and verifying the transactions.
- Priority should also be given to those who have lost homes and sources of livelihoods. For example, workers in the cotton ginning industry have been without jobs for some time, as many cotton ginning mills have shut down or reduced operations due to the damages to the cotton crop.

- To identify beneficiaries at the village level, the Project should support the development and implementation of a village level poverty ranking which should form the basis of beneficiary selection.
- Third parties should be involved for on ground monitoring in order to validate all transactions and ensure transparent distribution of project benefits.
- All NGOs and CSOs brought on as partners for the project should be credible and vetted.
- **Overall Recommendations for Implementing the Project**
 - Immediate livelihood support interventions should be prioritized, e.g., cash for work. Water supply should also be prioritized as it is a major challenge, and work on this should also aim to make water supply facilities climate resilient so that they continue operating during future floods. Infrastructure works should be prioritized only after livelihoods and water supply.
 - Prioritize the restoration of existing structures before developing completely new infrastructure
 - Local contexts must be considered when designing cash-for-work and livelihood support interventions, e.g., not implementing kitchen gardening in areas with saline groundwater
 - Training should be provided along with livelihood inputs, and as part of the cash-for-work programs.
 - Women must be mainstreamed in all project activities.
 - Villages and settlements should be protected from floods through the construction of ring embankments or by increasing the base elevation.
 - Livelihood inputs should include fertilizer, as standing water has degraded the productivity of the land
 - Natural waterways and drainage paths need to be restored and cleared of encroachment
 - The Provincial Disaster Management Authority should be more transparent with data
 - Certified seeds should be provided as part of the livelihoods restoration component
 - Coordination must be improved between relevant provincial government departments such as PDMA, irrigation, livestock departments.
 - Improvement of hydrological monitoring and reporting and early warning systems is essential to preventing loss of lives and livelihoods in the future
 - Fishing communities should be given tailored assistance, e.g. boats, gear in order to help them restore their livelihoods.
 - Procurement should be done at the local level, and not centralized to avoid risks of elite capture or misappropriation of Project benefits.
 - Support should also be provided to industries. For example, textile mills have been shut down or operating under reduced output because of the damage to the cotton crops. Textile and other industries are responsible for the employment of many people, and restoring these would have direct positive impacts.

- Mental health is overlooked and not prioritized in any flood response so far. This needs to be brought higher on the list of priorities.

- **Priorities for Cash-for-Work**

- Participants at each of the workshops were asked to provide feedback on priority areas for the CfW programs:
 - Restoration of water-ways and natural drainage paths came up as a high priority, as did restoration/repair of damaged irrigation channels and watercourses.
 - Water supply was also a high priority issue in all regions, with participants suggesting that the Project focus first on providing safe water supply to flood affected people.
 - Livestock support works were also favored by participants, including livestock vaccination, repair of animal pens, and restoration of fodder sources.
 - In terms of flood protection infrastructure, most participants agreed that settlement/village level resilience would be improved by the construction of flood protection embankments, and since this work requires minimal skilled labor, it would be well-suited for inclusion in the CfW program.
 - Also, at the community/village level, it was suggested that the community workforce could also be utilized for the clearing of local drains/water egress routes.

4.5.3 Community Consultations

Community consultations were carried out in the field and aimed to introduce the Project to potential beneficiary communities and understand their views on the potential successes and challenges in implementation, beneficiary identification, design of CfW and livelihood programs, and general feedback.

Eight community consultations were conducted, each of which included separate discussions with male and female members.

Table 9 - Summary of Community Consultations

<i>Community Name</i>	<i>District</i>	<i>Date of Visit</i>	<i># of Participants</i>
Miani Mallah ⁷ - Women	Jamshoro	December 13, 2022	26
Miani Mallah – Men	Jamshoro	December 13, 2022	10
Sawan Khan Panhwar – Men	Jamshoro	December 13, 2022	30
Residents of village Gajidero	Larkana	December 15, 2022	8 (5 men, 3 women)
Jam Khan Jatoi – Women	Khairpur	December 16, 2022	20
Jam Khan Jatoi – Men	Khairpur	December 16, 2022	12
Achlo Kolhi – Men	Umarkot	January 13, 2023	7
Achlo Kolhi – Women	Umarkot	January 13, 2023	30

⁷ This consultation also included LSO representatives from neighboring communities

- **Experiences and Challenges from 2022 Floods**

- Losses have been extremely high. Most impactful losses have been on homes and livestock. For example, in Miani Mallah, community members estimated that around 70-80% of the total livestock in the village was lost.
- Groundwater is also an issue. Community experiences from 2010 indicated that the quality of groundwater deteriorated significantly after the floods. Community members suggested that they were expecting similar deterioration in groundwater after all the water has receded.
- Particularly in communities around Manchar Lake, it was found that warnings (around the situation at Manchar, and the need to make a relief cut) reached them through informal means (social media, telephone) before they had any official warning from the government.
- Even the informal early warning was not early enough for communities in the area inundated after the Manchar relief cut was made. People had barely enough time to gather their belongings and were not able to make any other preparations, and emergency evacuation transport was not provided.
- News of the planned relief cut at Manchar Lake did not reach communities until the night before the cut was made. This did not allow them enough time to prepare.
- Rescue efforts were in many cases locally coordinated within the communities themselves. Government rescue teams did not arrive until much later.
- Beneficiaries of the Ehsaas Programme received some cash support, but many women were not able to take advantage of this due to not having valid ID cards, or unfamiliarity with the registration system.
- *Kacha* houses were least resilient. In the recent floods, even *semi-pukka* houses with flat roofs collapsed due to the weight of water. Houses with tapered/sloped roofs were observed to have withstood the rainfall.
- Religious minority groups consulted did not feel that there had been any discrimination by the government in its response efforts.
- Female participants revealed that violence against women, particularly spousal violence, had risen in their communities. They suggested that this rise in violence was due to men's' frustration with lost jobs and livelihoods, and reflected an overall deterioration in mental health of the flood affected communities.
- Damage to latrines and other sanitation facilities is disproportionately affecting women. Temporary facilities lack privacy, forcing women to wait until nightfall or early in the morning to use them.

- **Intervention Needs and Priorities**

- Livelihood support is the top priority.
- Women participants tended to rank sanitation as a significant priority.
- Cash for Work schemes should include:

- Cleaning of villages
 - Leveling of residential plots
 - De-weeding of waterways
 - Work related to clothes, handicrafts, etc. will allow for better women's' participation.
 - Preparation of food/meals for community laborers
- Livelihood and CfW schemes should target the poorest segments of society. Participants suggested that committees set up at the village level could help to identify the neediest in each village.
 - Schools need to be made operational. In both communities consulted in Jamshoro district, participants indicated that the quality of the government school was not acceptable and suggested that the project rehabilitate the damaged school buildings.
 - Interventions targeting the rebuilding/rehabilitation of homes should not simply focus on *kacha vs pukka* but should also consider the design of the houses to be more resilient. Participants suggested that the resilience of a home against heavy rainfall is as much a function of *kacha vs pukka*, as it is of the overall house design, especially sloped vs flat roofs.
 - Dewatering is a priority. The amount of standing water is too much to be dewatered by human power/community involvement.
 - Rehoming communities should be another priority. Many community members had been displaced for over 3 months, and indicated that there are still population pockets, particularly close to Manchar Lake, that are displaced from their homes and villages.
 - Previous programs implemented by other organizations included entrepreneurship loans given to women to set up small businesses, e.g., general stores, textile work, etc. A participant shared her experience with such a program, revealing that her textile business was fully paid off, and through this, she had employed and trained several members of her community. It was suggested that such entrepreneurship loans be included in the livelihood component of the Project.
 - Based on the information received through local media, charity groups/individuals and local NGOs, some of the key needs are dewatering, food, shelter, drinking water, health services, livelihood, revival of agriculture land, agri-inputs, livestock, extension services, construction material, rehabilitation of damaged link roads and transport. However, the list of needs, priorities and urgency varies in different areas. Women, elderly and children have special needs that are mostly similar in all areas.

5. Grievance Redress Mechanism (GRM)

The grievance redress mechanism (GRM) is an institutional arrangement that allows stakeholders to address grievances related to the project through a timely, transparent, and predictable process. A grievance is defined as any formal communication that expresses dissatisfaction about an action or lack of action, about the standard of services, works or policy, deficiency of service, works or policy of the project management and its implementation mechanism. During project execution, different issues and constraints may arise. In this situation, if stakeholders have inadequate means to voice and resolve grievances, they may turn to other venues, which may be cumbersome and lengthy, leading to delays in the project. Alternatively, if their grievances remain unresolved or ignored over time, it may lead to inflexibility, stalemate and delays for the project to meet its sustainable development goals.

The SFERP GRM will be gender-responsive, culturally appropriate, and readily accessible to the stakeholders at no cost and without retribution. It will enable Project Affected Persons (PAPs), local communities, employees, and other affected stakeholders to raise grievances and provide suggestions vis the sub-projects, with the project proponents and contractors, and seek redress when they perceive a negative impact arising from the activities. This mechanism serves as a platform to promptly resolve and address community concerns, reduce risks, and strengthen systems and processes, thereby contributing to positive service delivery. Therefore, the complaints/grievances should be addressed through a well-organized Grievance Redress Mechanism (GRM) covering all activities under the project.

5.1. Objective and Composition of GRM:

The principal objective of GRM is to implement and maintain a procedure for handling the environmental and social concerns of the project stakeholders. This procedure will include a redressal mechanism scaled to the project's identified risks and adverse impacts, focusing on stakeholders. Standard Operating Procedures (SOPs) and informational material will be prepared for the SFERP GRM in Urdu, Sindhi and English and made publicly available as soon as the Project begins implementation and before contractors mobilize to sites.

5.1.1 Specific Objectives:

- i. To systematically process complaints received from the Project Affected Persons (PAPs) and other stakeholders and provide a prompt, transparent and fair response and resolution without reprisals;
- ii. To provide project staff with practical suggestions/feedback that allows them to be more effective, accountable, transparent, and responsive to beneficiaries;
- iii. Increasing stakeholder involvement in the project
- iv. The GRM is expected to address 4 types of complaints: *Compensation; Environmental issues* (e.g., noise, pollution, solid waste management, flora/fauna, etc.); *Social issues* (Exclusion, Inclusion); *Gender Based Violence (GBV)*; and *other*

5.2. GRM structure

The SFERP grievance redressal mechanism (GRM) is established at three levels starting from the site, PIU and Project Steering Committee (PSC). The process at each level is defined as under:

5.2.1 Site level Grievance Redress Cell (GR Cell)

At the site level, a GR cell will be established to enter the PAPs concerns/grievances. The Community Liaison Officer (CLO) appointed by the Contractor will be its Focal Person/Convener and be responsible for registering grievances and maintaining all records. Grievance Focal Points (GFPs) will be nominated by the community at each sub-project site. These will be men and women whom the community can easily approach. Grievances can be received by GFPs or the CLO in writing or by word of mouth, and recorded in the grievance register by the CLO. The Grievance Register contents will be kept updated by the CLO and s/he will share the monthly Grievance Register with the Grievance Redress Committee (GRC) at PIU level, so that the GRC can maintain a consolidated record of all Project sites grievances. The contractor and the project manager are responsible for resolving site level grievances. If a grievance remains unresolved, it will be sent in writing by the project manager of each sub-project to GRC.

The responsibilities of GR Cell shall include the following:

1. Review, consider and resolve grievances site level;
2. Conduct fact-finding pertaining to grievances;
3. Resolve grievances within a period of one week;
4. Undertake analysis of data on grievances and use this to make informed decisions;
5. Maintain confidentiality if complainants wish to remain confidential;
6. Maintain an updated GRM database/ Complaints Log;

During the complaint investigation, the GRC works with the Contractor and the PIC. If mitigation measures are identified in the investigation, the Contractor promptly carries out the mitigation. PIC is responsible for ensuring that the Contractor carries out the measures.

5.2.2 Grievance Focal Points (GFPs)

The GFPs will be men and women from each community who will assist and facilitate the community members in reporting grievances resulting from project activities. The GFPs will be provided training by the PIU/PIC in facilitating grievance redress.

GFPs will be identified by the relevant community in consultation with the Social Safeguard team of PIU (SFERP), PIC and CLO. The GFP would be responsible for making the community aware of the following components:

- Inform people about the GRM and how it works, and their options depending on the types of complaint;
- Types of grievances not acceptable/eligible to the GRM;
- Intake channels at the GRM, e.g., phone numbers, postal and email addresses, and website and information that should be included in a complaint;
- Inform the Complainant of the investigation results and the action taken, and option of appeal to PSC if not satisfied with the outcome;

- Two GFPs (a female and a male) will be selected for each sub-project site.

5.2.3 PIU Level GRM

A Grievance Redress Committee (GRC) has been established at SFERP PIU office which shall resolve the grievances of affected persons/parties received at the PIU level. If a grievance remains unresolved at the PIU level despite making best efforts till the stipulated time of 21 days, it will either be retained for another 21 days with prior agreement of the Project Director and the complainant, or sent to Project Steering Committee (PSC) for resolution, depending on the GRC's assessment on which is the best option to facilitate a resolution.

The GRC will function as a dedicated body that ensures the grievance redress process is effective and efficient. It will comprise Environmental, Social Safeguard and Gender Specialists of PIU, a Representative of the District Commissioner's office, and community/civil society members from sub-project areas. Its Focal Person/Convener will be the Social Safeguards Specialist. Decisions or findings taken in the GRC would be binding upon the contractor.

The PIU will issue public notices to inform the public about the Grievance Redress Mechanism (GRM) sub-project area. The contractor will also display prominent signage containing the contact details of GRC in the Sindhi language. The complainant(s) can lodge their grievances through an email (sferp.sid.gos@gmail.com), phone (021-99332368), and fax number (021-99332367) at GRC based at PIU.

These phone and fax numbers and email ID will be managed by GRC based at PIU. The Social Safeguard Specialist will be the designated focal person to receive complaint(s) in writing, through calls, fax and emails. The Social Safeguard Specialist will have resources and facilities to maintain a complaints database which will be digitized and available online, and will communicate with the contractor, Site Engineers, and PIC.

Given that female community members have restricted mobility outside their villages and homes, the female PIU staff (Gender Specialist) will be required to visit the local communities to record grievances. The frequency of visits will depend on the nature and magnitude of activity in an area and the frequency of grievances.

The responsibilities of the GRC at PIU are:

1. The Social Safeguard & Resettlement Specialist shall be the focal person for GRC, which is responsible for logging the complaint and date of receipt onto the complaint database and informing the PIC and the Contractor;
2. The GRC will coordinate with local government to receive project-related complaints made directly to them;
3. The GRC shall review, consider and resolve grievances related to environmental and social issues during implementation received at the PIU level;
4. The GRC, with the PIC, is responsible for investigating the complaint to determine its validity and assess whether the source of the problem is due to project activities and identifying appropriate corrective measures. If corrective measures are necessary, GRC, through the PIC, will instruct the Contractor to take necessary action;
5. Resolve grievances presented to the GRC within a period of two weeks;

6. Inform the Complainant of the investigation results and the action taken;
7. Undertake analysis of data on grievances and use this to make informed decisions;
8. GRC decisions, if not acceptable to the complainant(s), can be appealed to the PSC;
9. Maintain an updated online GRM database/Complaints Log.

5.2.4 Appeals at the Project Steering Committee (PSC) Level

The PSC will meet on a quarterly basis to hear grievance cases during its regular meetings, and will be convened for special grievance redressal meetings as needed. PSC members and the Secretary Irrigation will address the grievance with a viable resolution. The below flow chart shows the grievance entry points:

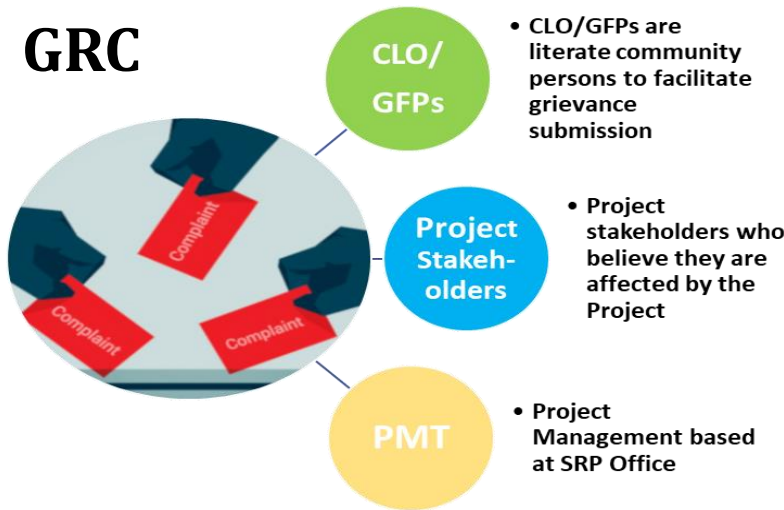
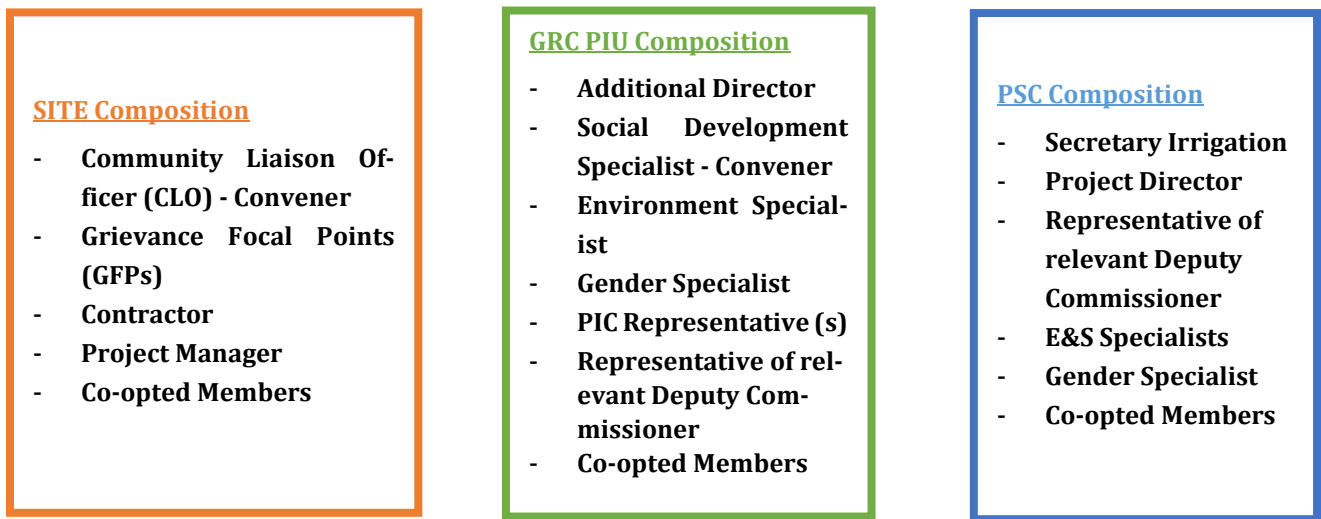


Figure 24: SFERP Grievances Processes

The GRC composition at different levels is given below.



Grievance Entry Points for Complaint

5.3. GRM for workers

Community Liaison Officer (CLO) will serve as Grievance Focal Point (GFP) for labor/workers complaints at site level. If the issue is successfully resolved, no further follow-up is required, and the case shall be documented and closed. In case the grievance is unresolved at the site/contractor level, the workers may directly approach GRC about their grievance. The prominent signage containing the contact details of GRC in the Sindhi language will be displayed at each site.

5.4. Grievance Redress Mechanisms for GBV and SEA/SH

Grievance Redress Mechanisms (GRM) will integrate mechanisms to track complaints related to SEA/GBV, including a feedback system for regular and timely feedback on actions taken to respond to complaints. These mechanisms will protect confidentiality of individuals without compromising access to justice.

Grievances related to GBV and SEA/SH will always be escalated to the PIU and will be dealt with by the PIU designated GBV specialist. GBV/SEA related complaints will be communicated to World Bank no later than 48 hours after being received by the GR Cell (site level) or by the GRC (PIU level).

The GRC/PIU will assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor. A list of GBV service providers will already be available with the GRC before project work commences. In general, the timeframe for resolution of complaints shall not exceed 21 days.

Grievances related to GBV and SEA/SH will be forwarded to the staff specifically trained to handle these types of complaints. The Social Specialist (as GRC Focal Person) and the Gender Specialist at the PIU will receive the necessary training to handle such sensitive cases.

The GRC will develop specific procedures to ensure complainants are able to register their grievances anonymously, and in a survivor-centered and discreet manner. The GRC will assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

5.5. Role of Contractor in GRM Complaints Register

The Contractor will maintain a complaint register at the campsite office to document all complaints received from the local communities. The register will also record the measures taken to mitigate these concerns. The final report regarding complaint closing will be communicated to PIC, the project manager is responsible to provide the record to GRC/PIU. The PIU shall carry out the monitoring of the implementation of measures for the eradication of complaints.

5.6. Reporting and Monitoring

The GR Cell will enter the PAPs concerns/grievances at site level. The PIU gender specialist will be responsible for managing GBV and SEA/SH-related complaints at the project/PIU level. SFERP PIU will develop specific procedures to ensure complainants are able to register their grievances confidentially, and in a discreet manner. GBV/SEA related complaints will be communicated to World Bank no later than 48 hours after being received by the GR Cell (site level) or by the GRC (PIU level).

The GRC will record the complaint, investigation, and subsequent actions and results in the monthly Environmental Management and Monitoring reports. In the construction and initial operational periods covered by loan covenants, the PIU will periodically report progress to the World Bank, including reporting complaints and their resolution. The tracking and documenting of grievance resolutions within the GRC and or PIU will include the following elements:

- i. tracking forms and procedures for gathering information from project personnel and complainant(s);
- ii. computerized grievance database with dedicated staff to update the database routinely;
- iii. systems with the capacity to analyze information to recognize grievance patterns, identify any systemic causes of grievances, promote transparency, publicize how complaints are being handled, and periodically evaluate the overall functioning of the mechanism;
- iv. processes for informing stakeholders about the status of a case; and
- v. procedures to retrieve data for reporting purposes, including the periodic reports to the PIU and GRC, reports into the monthly ESMP Compliance monitoring report to the World Bank.
- vi. An annual qualitative review of all complaints processed (ensuring filters such as gender, type of complaint, resolution status, time taken, intake channel, district/site, etc.) will also be undertaken to analyze the efficacy of the system.

The GRM will be provided the necessary budget required for its efficient functioning.

6. Budget and Responsibilities for Managing SEP Activities

6.1. Management Functions and Responsibilities

Two Project Implementation Units (PIU) have been set up in the Planning and Development Department and Irrigation Department of Govt of Sindh respectively. The role of each PIU will be overall project management and implementation, providing leadership to flood rehabilitation and coordination with all implementing partners, and effective communications and stakeholder engagement as per their respective project components. The PIUs will be responsible for the implementation of the activities in this SEP. The PIU Social Specialist, along with the Livelihoods Specialist will be responsible to track SEP activities. The stakeholder engagement activities will be carried out and documented by the PIU through quarterly progress reports, to be shared with the World Bank. Table showing details of PIUs and their components.

Table 10: PIUs and their Components

Sindh Irrigation Department	Planning and Development Department
Component 1 – Infrastructure Rehabilitation	
Rehabilitation of Irrigation and Flood Control Infrastructure	Restoration of Roads and Allied Infrastructure
	Restoration of Water Supply Schemes
Component 2 – Livelihoods Support	
	Livelihoods support
Component 3 – Institutional Strengthening for Resilience and Technical Assistance	
Strategic Studies for integrated irrigation, drainage, and flood protection systems	Expansion of Sindh Emergency Rescue Service
	Enhancing Preparedness for Disasters
Component 4 – Project Management and Operational Costs	
Project management and operational costs	Project management and operational costs

6.2. Budget

Implementation of the SEP will require US\$ 1.6 million over the duration of the project – PIU wise allocation to be updated once this SEP has been updated. This includes all costs related to ongoing engagement with stakeholders, information disclosure, grievance redress, and other activities described in the SEP. An estimate budget for implementing the SEP is provided below:

Table 11 - SEP Implementation Budget

<i>Item</i>	<i>Estimated cost (USD)</i>	<i>Comments</i>
Stakeholder engagement events (workshops, meetings, etc.)	100,000	Covers all organized events for mass stakeholder engagement, and includes location costs, technical services, catering, materials, etc.
Community consultations	100,000	All stakeholder engagement carried out with communities in the field
Mass communications campaigns	100,000	For awareness raising campaigns. Includes ad-space costs, printing, technical development of materials, etc.

SEP training activities	200,000	Related to training provided to project teams on SEP implementation, including GRM training.
Staff costs	200,000	All staff involved in implementing the SEP, including GRM
Travel costs	200,000	For traveling of staff involved in implementing the SEP
Miscellaneous costs	700,000	Other miscellaneous or unplanned costs
GRM implementation	100,000	
TOTAL	1,700,000	