

**Sindh Irrigation Department and Planning and
Development Department
Government of Sindh**

**Additional Financing for Sindh Flood Emergency
Response (P179981)**

[Draft]

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

[February 24, 2025]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Pakistan (the Borrower) will implement additional activities under Sindh Flood Emergency Rehabilitation Project (the Project), with the involvement of the Sindh Irrigation Department (SID) and the Planning and Development Department (P & DD) (the Project Implementing Entities (PIEs), Government of Sindh as set out in the Financing Agreement. The International Bank for Reconstruction and Development (the World Bank) has agreed to provide the additional financing for the implementation of the additional activities under the Project, as set out in the referred agreement(s). This ESCP supersedes previous versions of the ESCP for the Project and shall apply to the Parent Project as well as the additional financing for the Project.
2. The Borrower and PIEs shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the Borrower, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower through SID, P & DD and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Borrower the Chairman of P&DD and/or Secretary of SID. The Borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Continue to prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s) and contractor’s quarterly reports as directed under Action C.</p>	<p>Quarterly reports to the World Bank throughout Project implementation. Submit each report to the World Bank no later than 15 days after the end of each reporting period.</p>	SID & P &DD
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury [specify other examples of incidents and accidents, as appropriate for the type of operation]. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the World Bank no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the World Bank within a timeframe acceptable to the World Bank.</p>	SID & P &DD
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit reports to respective PIE and such reports to the World Bank upon request.</p>	<p>Submit the monthly reports to the respective PIE and World Bank upon request as annexes to the reports to be submitted under action A above.</p>	SID & P &DD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	<p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</p> <p>Notify the World Bank of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the [World Bank/Bank/Association] of: (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.</p>	No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).	SID & P & DD
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <ol style="list-style-type: none"> Continue to maintain Project Implementation Units (PIUs) as established under the original project with qualified staff and resources to support management of ESHS risks and impacts of the Project including one Environmental Specialist, one Social Development and Resettlement Specialist, and one Gender/GBV Specialist (total three specialists) in each PIU. Execute Third-Party Validation (TPV) exercise for bi- annual monitoring of Environment and Social compliance progress during the original project and AF implementation and will share their reports with the Bank. 	<ol style="list-style-type: none"> Throughout the original project and AF implementation. Bi-annually throughout the original project and AF implementation. 	SID & P & DD
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <ol style="list-style-type: none"> Continue to implement Environmental and Social Framework (ESMF), Stakeholder Engagement Plan (SEP), Resettlement Policy Framework (RPF), Labor Management Procedures (LMP) and corresponding Environmental and Social Management Plan (ESMP) for the parent Project, consistent with the relevant ESSs. Prepare, adopt and implement site specific Environment and Social Management Plans (ESMPs), consistent with the relevant ESSs. The exclusion list set out in the ESMF shall be ineligible to receive financing under the Project. 	<ol style="list-style-type: none"> Throughout the original project and AF implementation. Adopt the ESMP before launching the bidding process for the respective subproject Project activity prior to the carrying out of subproject Project activity that requires the adoption of such ESMP. Once adopted, implement 	SID & P & DD

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

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		b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.	
1.6	ASSOCIATED FACILITIES Ensure that the activities if identified as associated facility are carried out in accordance with the applicable requirements of this ESCP and the ESSs and risks and impacts are adequately addressed and including in the site specific ESMPs.	As part of preparation of ESMPs, if applicable	SID & P & DD
1.7	ACTIVITIES SUBJECT TO RETROACTIVE FINANCING Not Applicable under AF		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Continue to implement the Labor Management Procedures (LMP) prepared for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	Implement the LMP throughout the original Project and AF implementation.	SID & P & DD
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Continue to operate existing grievance mechanism of the original Project for Project workers, as described in the LMP and consistent with ESS2, during the implementation of the original project and AF. Grievance mechanism will be responsive to SEA/SH complaints.	Operate it throughout the original Project and AF implementation	SID & P & DD
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Continue to adopt and implement a Waste Management Plan (WMP) prepared as part of ESMF and also for the site specific ESMPs to manage hazardous and non-hazardous wastes, consistent with ESS3.	Same timeframe as for the adoption and implementation of the ESMPs (action item 1.2)	SID & P & DD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Continue and incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMP (action item 1.2)	SID & P &DD
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Continue to incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action (1.2) above.	Same timeframe as for the adoption and implementation of the ESMP.	SID & P &DD
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, risks of labor influx, air and noise pollution, spread of communicable diseases, GBV, SEA/SH, elite capture, and include mitigation measures in the ESMPs to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMPs (action item 1.2).	SID & P &DD
4.3	SEA AND SH RISKS a) Implement Gender and GBV Action Plan prepared for the original project, and SEA/SH requirements part of the ESMPs, to assess and manage the risks of SEA and b) Recruit a GBV Service Provider	a) Implement the Gender Action Plan throughout original Project implementation and AF. b) GBV Service Provider procured 3 months from Effectiveness.	a) SID & P &DD b) P&DD
4.7	DAM SAFETY (FOR ANNEX A, PARA. 5. ESS4) Engage qualified engineers to design dam safety measures for the small dams to be rehabilitated and restored under the Project, in accordance with good international industry practice and incorporate these measures in ESMPs, and thereafter adopt and implement such measures.	Same timeframe as for the adoption and implementation of the ESMF and relevant ESMPs.	SID & P &DD
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Continue to implement a Resettlement Policy Framework (RPF) prepared for the original Project and applicable for AF, consistent with ESS5.	Implement the RPF throughout the original Project and AF implementation.	SID & P &DD
5.2	RESETTLEMENT PLANS Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, and consistent with ESS5.	Prepare and implement RAPs prior to procurement and initiation of civil works.	SID & P &DD

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5.3	<p>GRIEVANCE MECHANISM</p> <p>Continue to implement and operate a grievance mechanism as described in the RPF and consistent with ESS5. The existing grievance mechanism prepared under original SFERP will continue for the AF.</p>	Continue to implement existing project GRM throughout implementation of original project and AF.	SID & P & DD
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Continue to adopt and implement mitigation measures related to biodiversity risks and impacts as part of the ESMF/ESMPs, consistent with ESS6.</p>	Same timeframe as for the implementation of the ESMF and relevant ESMPs.	SID & P & DD
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Describe and implement the chance finds procedures, as part of the ESMF of the Project.</p>	Included in the ESMF. Same timeframe as for the implementation of the ESMF and relevant ESMPs.	SID & P & DD
8.2	<p>CHANCE FINDS</p> <p>Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP (action item 1.2), consistent with ESS8.</p>	Same timeframe as for the implementation of the ESMF and relevant ESMPs.	SID & P & DD
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION.</p> <p>Continue to implement a Stakeholder Engagement Plan (SEP) prepared for the original Project, consistent with ESS10, which includes measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and continue to consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	Continue implementation of SEP throughout the original Project and AF.	SID & P & DD
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Continue to publicize, maintain, and operate an accessible grievance mechanism prepared for the original project, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed confidentially, in a manner consistent with ESS10.</p>	Maintain and operate the mechanism throughout the original Project implementation and AF	SID & P & DD

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	The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.		
CAPACITY SUPPORT			
CS1	<p>Trainings required for all Project workers including Consultant and Contractors staff on:</p> <ul style="list-style-type: none"> • Introduction to ESF • Stakeholder mapping and engagement • Preparing Environment and Social Assessment Instruments • Grievance mechanism • Community and occupational health and safety aspects • Occupational Health and Safety (OHS) • Waste Management Pollution prevention and control • Monitoring and reporting • Mitigation against Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), Gender Based Violence (GBV) and Violence Against Children (VAC), Gender sensitivity 	Throughout original Project and AF with refreshers on biannual basis and monthly onsite refreshers for contractor staff.	SID & P & DD
CS2	<p>Both PIUs Directors and staff to receive training on</p> <ul style="list-style-type: none"> • ESF and implementation of Environmental and social instruments • Stakeholder engagement and Grievance Redress Mechanism (GRM), including GRM for SEA/SH • Mitigation against Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), Gender Based Violence (GBV) and Violence Against Children (VAC), Gender sensitivity • Resettlement and Land acquisition. • Labor Management • Resource Efficiency and Pollution Prevention and Management • Occupation Health and Safety (OHS) • Incorporating E&S requirements into bidding documents/contracts 	Throughout implementation of original project and AF and conduct refreshers on biannual basis	SID & P & DD