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Client: Communication and Works Department (C&WD) of Khyber Pakhtunkhwa

KHYBER PAKHTUNKHWA RURAL INVESTMENT AND INSTITUTIONAL SUPPORT PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) FOR TEHSIL OFFICES & RESIDENCE COMPLEX KALAYA, DISTRICT ORAKZAI

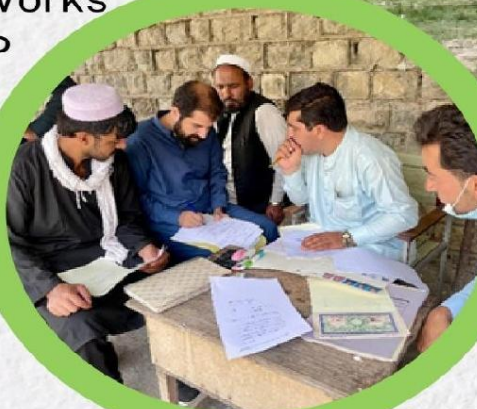
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List of Acronyms

Communication & Works Department	C&W Department
Construction Contractors	CC
Contractor Environmental and Social Management Plan	CESMP
Environmental Engineer	EE
Environmental Impact Assessment	EIA
Environmental Protection Agency	EPA
Environmental Protection Ordinance	EPO
Environmental and Social Framework	ESF
Environmental and Social Management Plan	ESMP
Environmental and Social Standards	ESS
Federally Administered Tribal Area	FATA
Frontier Regions	FRs
General Environmental Assessment	GEA
Government of Khyber Pakhtunkhwa	GoKP
Government of Pakistan	GOP
Grievance Redress Mechanism	GRM
Initial Environmental Examination	IEE
Khyber Pakhtunkhwa	KP
KP Rural Infrastructure and Institutional Support Project	KPRIISP
Newly Merged Districts	NMDs
National Environmental Quality Standards	NEQS
Planning & Development Department	P&D Department
Pakistan Environmental Protection Act	PEPA
Pakistan Environment Protection Agency	Pak-EPA
Personal Protective Equipment	PPEs
Project Coordination & Management Unit	PCMU
Project Director	PD
Project Implementation Unit	PIU
Pakistani Rupees	PKR
Supervision Consultants	SC

Executive Summary

The Khyber Pakhtunkhwa Rural Infrastructure and Institutional Support Project (KPRIISP), funded by the World Bank, strengthens governance and service delivery in Pakistan's historically underserved Newly Merged Districts (NMDs). It aligns with the Tribal Decade Strategy (2020–2030) to build citizen-centric institutions and uplift vulnerable groups, particularly women. The subproject, the proposed new Tehsil complex Kalaya, District Orakzai, will be built on a total area of 10 kanals of land within the existing Government compound to cater for administrative Offices and residential accommodation gaps. The complex will consist of the Tehsil administration Offices, residential apartments, and Bachelor employees' suites.

Environmental and social challenges exist in Kalaya, including higher concentrations of total coliform in water, posing health risks to residents. Additionally, the area has low female literacy, inadequate health care facilities, and limited local economic opportunities.

The ESMP ensures compliance with the World Bank's Environmental and Social Framework (ESF) and the KP's Environmental Protection Act (2014), and adopts proactive measures to mitigate risks. A stakeholder consultation, involving key district-level stakeholders, was held at the Tehsil level to evaluate the site's accessibility, safety, and sustainability. Participants recommended a First Aid room to address minor medical emergencies, the inclusion of separate waiting areas and washrooms for women, as well as a lactation room for nursing mothers, the need for ramps and barrier-free pathways for persons with disabilities, and planting of new trees of native species to promote sustainability. Continuous stakeholder consultations via community briefings and a Grievance Redress Mechanism (GRM) accessible via phone, email, or in-person (resolution within 15 days) are part of the ESMP.

The ESMP provides a structured framework for potential environmental and social risks, defining mitigation targets, assigning responsibilities, and ensuring adequate resource allocation. Key focus areas during the design/pre-construction phase include compliance with seismic and structural design standards, sustainable drainage planning, solid waste management, and detailed health and safety measures. In the construction phase, it addresses critical concerns such as air and water pollution control, noise and vibration mitigation, soil conservation, traffic management, labor safety, communicable disease prevention, and preservation of flora and fauna. It emphasizes proactive planning, continual monitoring, and strict adherence to environmental safety protocols.

A Capacity Building and Training component provides support to the effective implementation of the ESMP by enhancing the skills and environmental awareness of project personnel. This includes targeted training programs for the contractor's workforce and client-side professionals. A well-defined institutional framework that assigns clear roles and responsibilities across project stakeholders. The primary entities responsible include the Project Implementation Unit (PIU), the Supervision Consultant's Environmental Engineer, the Contractor's Site Environmental Engineer, and the Khyber Pakhtunkhwa Environmental Protection Agency (EPA) as the regulatory authority. A project's reporting framework is developed to ensure transparency, accountability, and timely communication with all relevant stakeholders, particularly concerning environmental and social performance.

The total Environmental & Social (E&S) implementation budget is **PKR 8,207,200 /-**, covering mitigation measures, GRM operation, community engagement, and monitoring. This integrated approach prioritizes sustainability, social inclusion, and transparency throughout the project lifecycle.

1. INTRODUCTION

1.1 Project Description with scope of work

The Tribal Decade Strategy (2020-2030) points to the extension of administrative and service delivery systems as a critical pre-requisite for improving development outcomes for areas facing some of the highest poverty rates in Pakistan. In this context, the Government of Pakistan (GOP) and GoKP have requested World Bank financing to support the first phase of the Tribal Decade Strategy, with a strategic focus on building responsive and accountable institutions for service delivery and development in the Newly Merged Districts (NMD) and Frontier Regions (FRs). The World Bank-funded KP Rural Infrastructure and Institutional Support Project (KPRIISP) will provide complementary and foundational investments in infrastructure and institutional systems to strengthen the Government's investments, both recurring and development, in the merged areas. The KPRIISP aims to enhance service delivery and socio-economic development in the NMD and FRs of KP, addressing long-standing disparities resulting from historical governance gaps and inadequate infrastructure. Aligned with the Tribal Decade Strategy (2020–2030), the project focuses on strengthening integrated service delivery centers at district, sub-divisional, and Tehsil levels, building local government capacity for inclusive and participatory planning, and investing in critical public services, particularly benefiting poor and vulnerable households. Spanning eight NMDs and six FRs, the project emphasizes responsive and accountable institutions, improved infrastructure, and active citizen participation, including empowering women at the grassroots level, to foster sustainable development and reduce multidimensional poverty.

1.2 Project Development Objective

The proposed subproject, Tehsil complex Kalaya, District Orakzai, is located along the “Lower to Upper Orakzai Road,” which provides direct access to the compound where the existing Government Colony is situated. The proposed subproject site is approximately 1 kilometer from Kalaya Bazaar. The site coordinates and site pictures showing the existing site conditions are provided in Annexure-1 with the ESMP. The overall aim of the proposed subproject complex is to fulfill the office and residential accommodation needs of government officials and employees at the tehsil headquarters. The specific objectives are:

- i. To provide the office accommodation requirements for the Tehsil Administration, Tehsil Municipal Administration, and Line Departments with all required basic and allied facilities, and
- ii) To meet the residential demands of Government Officers and associated staff, with allied services.

While preparing the E&S screening checklist of the subproject, placed at Annexure -2, it has been observed that the construction activities of the proposed Tehsil Complex will have some moderate level concerns/impacts, within the site and immediate surrounding areas, such as air and water pollution, noise and vibration, soil conservation, generation of construction and solid waste, traffic management, labor safety, and preservation of flora and fauna can arise. In view of this, the ESMP places a strong focus on air and water pollution control, noise and vibration mitigation, soil conservation measures, sustainable drainage planning, solid waste management, and detailed health and safety measures.

1.3 Project Components

The proposed new Tehsil complex will be built on 10 kanals of land within the existing Government compound. The proposed complex has the following components:

1. The new Tehsil Office building is a multistoried, ground+2-storied building that provides Offices with allied facilities for the Tehsil Administration staff and visiting general public, Map 5 of the Annexure-3.

2. The residential facilities will include a 2-bedroom apartment building with ground +2 storied, Map 14 of the Annexure-3.
3. A separate bachelor's suite for employees not accompanied by their respective families, Map 25 of the Annexure-3.

The proposed subproject, in addition to the construction of new office buildings and residential accommodation, involves the demolition of 16 old quarters to make available the required space for the new buildings.

The land for the proposed subproject has been in the possession of the District Government for the last 52 years. Presently, it has a Government Colony with Tehsil Administration offices and residences. Therefore, no land acquisition is required to construct the proposed tehsil Complex at the proposed site.

The proposed new building will include Offices, public waiting areas (for both male and female visitors), public washrooms (for both males and females), a bank counter, a kitchen on each floor, and circulation areas for easy access and circulation of officials and the public.

The proposed accommodation facilities will include a 2-bedroom apartment building for Tehsil Administration staff, and separate bachelor's suites for employees not accompanied by their families.

Provisions of open spaces are made within the buildings, and landscaping areas are proposed in the surrounding areas and along the roads for air circulation and to increase the aesthetics of the area. Also, proper parking facilities are proposed for each building, Maps 5, 6, 14, and 25 of the Annexure-3.

1.4 Area of Influence of the Subproject

The proposed subproject site's influence area within a range of 500 meters to 1 kilometer includes several community facilities, including schools, a college, a market, mosques, a hospital, a bank, a Tableeghi Markaz, mazaars, and a playground. The area of influence of the subproject is shown in Map 3 of the Annexure-3.

2. LEGAL, POLICY FRAMEWORK, AND REGULATORY REQUIREMENTS

2.1 Applicable Environmental and Social Policies

The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting shared prosperity. The WB's ESF Environmental and Social Standards related to this subproject are as follows:

- **Environmental and Social Standard 1:** Assessment and Management of Environmental and Social Risks and Impacts;
- **Environmental and Social Standard 2:** Labor and Working Conditions;
- **Environmental and Social Standard 3:** Resource Efficiency and Pollution Prevention and Management;
- **Environmental and Social Standard 4:** Community Health and Safety;
- **Environmental and Social Standard 10:** Stakeholder Engagement and Information Disclosure.

These Standards establish objectives and requirements to avoid, minimize, reduce, and mitigate risks and impacts, and where significant residual impacts remain, to compensate for or offset such impacts.

2.2 National and Provincial Legal and Regulatory Framework

Environmental governance in Pakistan has evolved significantly since the introduction of the Environmental Protection Ordinance (EPO) of 1983, providing a legal framework for addressing pollution and environmental degradation. The EPO 1983 was improved after an extensive and prolonged consultative process with all stakeholders, and a new law, the Pakistan Environmental Protection Act (PEPA), was promulgated in December 1997. In 2000, the Pakistan Environmental Protection Agency (Review of IEE and EIA) PEPA Rules were prepared for the operationalization and application of the Act. The 18th Constitutional Amendment devolved environmental governance to the provincial level, allowing provinces to legislate and enforce their environmental laws. Under the 18th Amendment, the Provincial Government enacted the Khyber Pakhtunkhwa Environmental Protection Act of 2014 to protect, conserve, rehabilitate, and improve the environment within the province. Under section 31 of the Khyber Pakhtunkhwa Environmental Protection Act, 2014, the Government of Khyber Pakhtunkhwa makes the Khyber Pakhtunkhwa Environmental Assessment Rules 2022. The KP Environmental Assessment Rules in Section 2 provide the rules for the proposed assessment of projects. The details of the rules are as under:

4. Projects requiring an EIA or IEE, or GEA. ---Where the project falls within the categories mentioned in Schedules II, III, and IV, the proponent shall file EIA or IEE, or GEA, respectively, with the Agency.

5. 6. Preparation of guidelines for EIA, IEE and GEA. --- Guidelines for the preparation of EIA or IEE, or GEA of general and sectoral applicability may be specified by the Agency, provided that such guidelines may indicate specific assessment requirements for planning, construction, and operation of a project relating to a particular sector.

This subproject has low to moderate environmental and social risks and therefore falls in the General Environment Assessment category.

2.3 Institutional Responsibilities

While the Pak-EPA is the federal agency, each province also has its own Environmental Protection Agency (EPA) that operates independently within its jurisdiction. Khyber Pakhtunkhwa (KP) has its EPA. The KPRIISP project operates in the NMAs, and they are now part of the KP, so the regulatory authority for the KPRIISP and its subprojects is the EPA, KP.

The subproject is committed to ensuring environmental compliance. Accordingly, General Environmental Approval (GEA) will be obtained from the EPA-KP, in line with the Environmental Protection Act, 2014, and the Environmental Assessment Rules, 2021, before initiating any construction activities under the proposed subprojects." The relevant section of the EPA Environmental Assessment Rules, 2021, is placed at Annexure 4.

3. ENVIRONMENTAL AND SOCIAL BASELINE

Kalaya is a town and the Tehsil headquarters of Lower Orakzai Tehsil, Orakzai District, in the Khyber Pakhtunkhwa province of Pakistan. It is located at 33°44'44"N 70°57'35"E with an altitude of 1645 meters. It is currently the winter administrative capital of Orakzai District.

3.1 Environmental Baseline

The environmental baseline of Kalaya town in District Orakzai includes its Biological and Physical Environmental characteristics, potential sources of pollution, and its challenges.

Biological Environment

The biological environment of Kalaya Town is primarily characterized by a blend of dry temperate and subtropical vegetation zones. The mountain slopes feature some natural vegetation, including shrubs, grasses, and trees.

Flora and Fauna: The land of Kalaya is covered mainly by scattered forests, spread over 13,050 acres, out of which approximately 276 Acres are under dense forest cover. The dominant plantation type is tropical thorn forest at low elevation hills and oak-Yew Forest at the high elevation region of the forest. Some of the dominant families of the region include Acanthaceae, Adaintaceae, Amaranthaceae, Asteraceae, Balsaminaceae, Brassicaceae, Chenopodiaceae, Euphorbiaceae, Lamiaceae, Liliaceae, Malvaceae, Mimosaceae, Moraceae, Oleaceae, Papilionaceae, Pinaceae, Poaceae, Polygonaceae, Rosaceae, Solanaceae, Ulmaceae, Umbelliferae, Utricaceae, and Zygophyllaceae.

The proposed subproject site has 10 trees, having 04 Chinaberry (Bakayan) Trees (*Melia azedarach*), 01 Oriental Plane (Chinar) Tree, and 05 Acacia (Kikar/Babul) Trees. The bird diversity of the region includes *Lophophorus impejanus* (Monal Pheasant), *Scolopax rusticola* (Woodcock), *Melanoperdix niger* (Black Partridge), *Perdix perdix* (Grey Partridge), *Alectoris rufa* (Red Legged Partridge), *Ammoperdix griseogularis* (SeeSee Partridge), *Columba livia* (Rock Pigeon), *Passer domesticus* (House Sparrow), *Corvus splendens* (Crow), *Accipiter gentilis* (Juvenile Hawk), *Gyps fulvus* (Griffon vulture), and *Picus squamatus* (Scaly Bellied Woodpecker).

Physical Environment

The water quality of the Kalaya Town area, District Orakzai, presents concerns about drinking water quality due to contamination.

Topography: Kalaya Town is characterized by hilly, mountainous terrain interspersed with fertile valley plains. The region consists of a rugged, mountainous tract, which is part of the Karagh Ghar Range, a spur of the Safed Koh mountains. The hilly terrain is dissected by numerous dry water courses and streams that form fertile valleys.

Climate: Kalaya has intense cold winters and a mild, hot summer season. June and July are the hottest months. The Maximum and minimum temperatures during June are 33°C and 20°C, respectively. December, January, and February are the coldest months in the area. The average Maximum and minimum temperatures of the area in December are 16°C and 1°C, respectively. Because of its geographical position, i.e., surrounded by mountains covered with dense trees, the summers are mild. Due to climatic extremes and high vulnerability, the region is already facing frequent and intense episodes of drought and flash floods.

Soil Morphology: Soil morphology of the Kalaya Town primarily has a texture ranging from clay to sandy loam and is typically described as alkaline and calcareous. The parent material often consists of loess, residual materials from underlying limestone and shale, and recent alluvial/aeolian deposits. The dominant soil texture is generally a mix, ranging from sandy loam in some areas to clay in others, with an overall average often classified as sandy clay loam. The soil in the valleys is fertile and is used for crops such as wheat, maize, sorghum, and fodder ("bear").

Water Quality and Resources: The water quality results show that most of the measured physical and chemical parameter concentrations of water samples fall within the permissible limits as prescribed by Pakistan Standard & Quality Control Authority Standards (PSQCA Standard). However, in these water samples, the TDS values exceed the permissible limits. In the microbiological parameters, Total Coliform is present, which is the result of poor sanitation conditions in the area. The water quality test results are provided in Annexure 5. The data provided in Annexure 5 is

from a secondary source; however, the contractor will conduct water quality tests before construction starts at an EPA, KP-registered laboratory to establish a baseline for later-stage monitoring.

In Kalaya town, sanitation is a major issue, indicating the area is deprived of basic hygienic services due to the non-existence of adequate sanitation infrastructure. The overall sanitation system or any infrastructure is almost non-existent in the area.

Ambient Air Quality: The results indicated that the PM_{2.5} and PM₁₀ levels are within permissible limits, i.e., 80 µg/m³ and 150 µg/m³, respectively. The air quality test results are provided in Annexure 5. The data provided in Annexure 5 is from a secondary source; however, the contractor will carry out air quality tests before construction starts at an EPA, KP-registered laboratory to establish a baseline for later-stage monitoring.

Geology and Soil Quality: The geology of the Kalaya and its nearby areas is surrounded by rocks varying from Lower Jurassic to Eocene. The rocks of the area mainly consist of shale, marl, sandstone, and limestone. The soil varies from silty loamy to silty clay and clay. Soil is used for dry farming and irrigated water cultivation. Soil is generally considered fertile, which varies from loamy to silty loamy with a creamy texture. The loam soil contains a medium degree of organic matter and clay content. It has also been observed that the soil of the Orakzai District is fertile and good for agriculture.

3.2 Social Baseline

The social form of Lower Orakzai Tehsil presents a very low female literacy in education, inadequate and limited health care facilities, and limited means of economic opportunities at the local level, as the main reliance is on subsistence agriculture, livestock, mining, and labor jobs in other districts and abroad for livelihoods. Addressing the socio-economic challenges, particularly in education, remains crucial for sustainable development.

Population: The 2023 census records that the Lower Orakzai Tehsil population is 125,944 persons, with 65,308 males and 60,635 females, with a sex ratio of 107.71. The average population density in Lower Orakzai Tehsil is 222.91/km². The population of Lower Orakzai Tehsil is growing at a rate of 2.7% annually. The average household size in the Lower Orakzai Tehsil is 8.16 persons, indicating large family units.

Literacy Rate: The literacy rate recorded in the 2023 census for Tehsil is 41.9%, showing a reasonable literacy rate among the newly merged areas. However, a significant gender disparity exists, with male literacy at 59% and female literacy at 23.6%. The females face severe barriers due to patriarchal culture, limited schools, and a lack of female teachers, leading to very low female literacy rates.

Healthcare Challenges: Rapid population growth has exerted great pressure on health services and facilities. The present health facilities are inadequate and need much attention. There are many health facilities available in Kalaya city, which include 13 BHUs, 1 MCHC, 2 hospitals, and small private clinics. However, to a very small percentage of the population, the health facilities are available within a range of 2-3 km from their homes. People have to travel some distance to access the health facilities.

Economic and livelihood: The economy and livelihood in Lower Orakzai Tehsil are primarily based on subsistence agriculture, livestock breeding, and mining. A significant portion of the population also relies on immigration to other districts for jobs and sending remittances back home.

Religious and Linguistic Diversity: The town of Kalaya in the Orakzai District of Pakistan has a population composed of ethnic Pashtuns who primarily speak the Pashto language and follow Sunni and Shia Islam.

4. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

4.1 Stakeholder Identification and Public Consultation

The potential stakeholders for the subproject were identified in a consultation with the respective Tehsil Administration at the inception stage, when the requirements of the Tehsil Administration were obtained for the subproject. The approach adopted for the consultation process in newly merged areas is to have the first consultation with the relevant District /Tehsil administration to get their views and understanding of the process, and later, with their advice, hold a broad-level consultation for the subproject. This approach has been adopted in view of the prevailing vulnerable security environment and has worked well for the C&W component of KPRIIP. A consultation session was conducted on 22nd September, 2025, in the Tehsil Administration Office and various offices of the stakeholders. The list of participants is in Annex 6, and photographs of the consultation and site area are shown in Annex -7. The objectives of the consultation were to inform the stakeholders about the subproject design, its environmental and social impacts during the project implementation. Suggestions and concerns were recorded and addressed in this ESMP for compliance during the execution phase. Stakeholder consultations will be a continuous process under the subproject, and more sessions will be carried out as per the guidelines given in SEP. Consistent with the KPRIISP SEP, this subproject adopts the principles of openness, cultural appropriateness, and inclusiveness. Special attention is paid to vulnerable groups to ensure they are not disproportionately affected. In the consultation, the stakeholders provided their feedback regarding the subproject and also gave their suggestions to further improve the subproject functionality. Stakeholder feedback is presented below:

- On the site suitability, all stakeholders were in strong agreement that the proposed site within the Tehsil Administration Compound is highly suitable for the establishment of the new Tehsil Complex.
- Regarding the accessibility of the site, it was widely acknowledged as a strength of the proposed site. The Bank of Khyber staff confirmed that the site is already accessible for men, women, children, the elderly, and persons with disabilities. The stakeholders highlighted that the compound is equipped with a reliable, dedicated lighting system, which enhances safety and visibility during evening hours. In addition, the presence of three nearby bus stations was noted as a significant advantage, as it provides convenient and affordable public transport options for visitors, staff, and community members.

The suggestions that the stakeholders made in the consultation and their respective responses are presented in the following table:

Table 1: Stakeholder Recommendations and the Respective Response

Serial No.	Stakeholder Category (Gender & Department)	Stakeholder Recommendation	Response to the Recommendation
1.	Female – Community Members (Visitors at NADRA/CFC & Families of District Administration Staff)	Female community members focused on safety and health services, recommending that a First Aid room be incorporated to address minor medical emergencies on-site.	The proposed building of Tehsil Administration has enough space to accommodate a First Aid room to provide immediate medical assistance to the staff and visitors.
2.	Male – NADRA Staff & Community Members; Female – Community Members; Male – District Administration & Line Departments	Female participants and district administration representatives strongly recommended the inclusion of separate waiting areas and washrooms for women, as well as a lactation room for nursing mothers.	The proposed Tehsil Administration building already has these facilities in the building design.
3.	Male – District Administration & Line	They highlighted the need for strict dust suppression measures and training of	The suggested measures are made part of the ESMP and will be strictly implemented at the site and

	Departments; Male – Bank of Khyber Staff	laborers in proper waste management during construction.	monitored by the PIU staff on the site.
4.	Female – Community Members (Visitors & Families); Male – NADRA Staff & Community Members; Male – District Administration	The stakeholders emphasized the need for ramps and barrier-free pathways for persons with disabilities. Female community members agreed that the site is generally accessible, but raised the need for separate waiting areas for women.	The ramps and barrier-free pathways are already incorporated in the building design of the complex. Also, separate waiting areas are provided in the proposed building's design.
5.	Male – District Administration & Line Departments; Male – Vendors; Male – Bank of Khyber Staff	The stakeholders recommended additional planting of new trees if the existing trees at the site are to be cut.	The ESMP of the subproject has included the additional plantation, 10 new trees of the same species, for each tree to be cut down. The cost of the plantation is covered in the subproject PC I cost under the “External Development Head.”

4.2 Stakeholder Analysis

The purpose of stakeholder analysis is to systematically identify individuals, groups, and organizations who may be affected by or have an interest in the proposed subproject activities, and to assess their interest and roles. This ensures that engagement efforts are inclusive, contextually appropriate, and effective in addressing both risks and opportunities. Stakeholders have been categorized based on their relationship to the subproject. They are the primary stakeholder, those individuals and groups directly affected, positively or negatively, by the subproject. Secondary stakeholders are those who have an interest in the project but are not directly affected. The following Table represents the identified stakeholders and their potential interest in the project.

Table 2: Stakeholders Identification and their respective Interest and roles

Serial No.	Stakeholders	Project Impact, their Interest, and role
Primary Stakeholders		
1.	Assistant Commissioner, Lower Orakzai Tehsil, District Orakzai	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
2.	Additional Assistant Commissioner Revenue, Lower Orakzai Tehsil, District Orakzai	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
3.	TMO, Lower Orakzai Tehsil, District Orakzai	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
4.	SDO, LG&RD Department, Lower Orakzai Tehsil, District Orakzai	Concerned about potential impacts such as noise, dust, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.

5.	Deputy Ranger, Wildlife Department	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
6.	DSO, Sports Orakzai	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction.
7.	Senior Subdivisional Forest Officer, Forest	Benefit from improved Office accommodation and facilities.
8.	Tehsildar, Lower Orakzai Tehsil, District Orakzai	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
9.	Naib Tehsildar, Lower Orakzai Tehsil, District Orakzai	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
10.	Families of Government Officials living in existing houses)	Concerned about potential impacts such as noise, dust, land use, water access, and disturbance in routine activities due to construction. Benefit from improved Office accommodation and facilities.
11.	Supervisor, LG&RD Department, Lower Orakzai Tehsil, District Orakzai	Concerned about potential impacts such as noise, dust, and disturbance of the area activities due to construction. Benefit from improved Office accommodation and facilities.
12.	Staff of Tehsil administration, Lower Orakzai Tehsil, District Orakzai	Concerned about potential impacts such as noise, dust, and disturbance of the area activities due to construction. Benefit from improved Office accommodation and facilities.
13.	Branch Manager, BOK	Concerned about potential impacts such as noise, dust, and disturbance the area activities due to construction.
14.	BOM, Bank of Khyber	Concerned about potential impacts such as noise, dust, and disturbance in the area due to construction.
15.	Female Community Members at CFC, NADRA	Concerned about potential impacts such as noise, dust, and disturbance in the area due to construction. Benefit from improved Office facilities.
16.	Civil Defense Staff	Concerned about potential impacts such as noise, dust, and disturbance in the area due to construction.
17.	Rescue 1122 staff	Concerned about potential impacts such as noise, dust, and disturbance in the area due to construction.
18.	Petion Writer from Vanders	Concerned about potential impacts such as noise, dust, and disturbance in the area due to construction.

Secondary Stakeholders		
19.	Local Religious Leaders (Imams, Pesh Imams)	Hold moral authority and can influence public perception of the project.
20.	Local Administrative Authorities (Tehsil Level)	Involved in need assessments, land coordination, law and order, and service delivery.
21.	Environmental Protection Agency, Khyber Pakhtunkhwa (EPA-KP)	Regulatory authority responsible for ensuring environmental compliance and reviewing ESMP documentation.
22.	Contractor (s) and Construction Workers	Involved in implementation; requires clear orientation on social and environmental safeguards.
23.	Media and Information Channels (Local Radio Channels)	Important for public disclosure, awareness-raising, and helping to spread accurate information.

4.3 Stakeholder Engagement Plan & Disclosure

This Stakeholder Engagement and Disclosure Plan outlines how stakeholders will be involved and informed during the construction phase of the project under the ESMP in Kalaya, District Orakzai. Its purpose is to ensure continuous two-way communication, enhance social accountability, reduce conflicts, and foster community support through timely and culturally appropriate engagement. Consultations with women will be held in "private spaces" or "gender-neutral spaces" by female staff (as noted in SEP Section 2.3). Communication materials will use images/infographics for those with low literacy (as per SEP Section 6.3).

Table 3: Engagement Activities and Methods (During Construction)

Activity	Target Stakeholders	Frequency	Communication Method	Responsibility
Community Briefings	Residents (male & female), tribal elders, local community-based organizations	Monthly	Public meetings, mosque announcements, and community centers	Contractor's social staff, Supervision Consultant Social Staff
Information Disclosure	General public	Quarterly	Posters, notice boards, Urdu & Pashto pamphlets. Disclosure on C&W/P&D Websites, Announcements via local Mosques (for construction timing/safety), Social Media updates	Communication Officer, PIU C&W
Focused Group Discussions (FGDs)	Local Residents	Bi-monthly	Small group meetings, female outreach through the Gender staff	Social and Gender Staff
Grievance Redress Mechanism (GRM) Activation	All stakeholders	Weekly	Complaint boxes, hotline, in-person reporting, and all intake measures as these become available	Grievance Officer
On-site Signage & Safety Notices	Public, labor, and daily commuters to the complex.	Weekly	Visual safety signs, barriers, and flagmen	Contractor HSE team
Coordination Meetings	District administration, EPA-KP	Quarterly	Formal briefings, email reports, and written updates	PIU

5. ENVIRONMENTAL AND SOCIAL MONITORING PLAN

5.1 Potential Environmental and Social Impacts, Mitigation Measures, and Monitoring Plan

The Environmental and Social Management Plan (ESMP) provides the framework for the implementation of the mitigating measures and environmental management and monitoring during the construction and operation phases of the proposed subproject. The proper implementation of the ESMP will ensure that any adverse environmental impacts are adequately mitigated, either totally, prevented, or minimized to an acceptable level, and required actions to achieve the above stated objectives are successfully taken by the concerned institutions or regulatory agencies. The implementation of ESMP will be carefully coordinated with the design, construction, and operation programs of the project to ensure that relevant mitigation measures are implemented at the appropriate stage and adequate resources are properly allocated to achieve the desired results.

Table 4, below, provides the Environmental Management Plan. The proposed schedule for the ESMP is 3 years, comprising the first 3 months for the pre-construction phase for contractor mobilization and carrying out the required initial stage preparation. The 2 years and 3 months will be for the construction phase to complete the construction of buildings. The last 3 months are for the post-construction phase, during which the built complexes are handed over to the respective administrations. However, the ESMP schedule is contingent upon the subproject's approval from the relevant Government forums and initiation. The actual timeline will be defined once those formalities are completed. The plan outlines impacts, targets, mitigations, and the responsible authorities for the implementation of the mitigation measures during design, construction, and operational phases.

Table 4: Environmental Management Plan

Sr. No.	Parameters	Target	Mitigation	Status of Activity	Implementation Responsibility
Design/pre-construction Phase					
1	Design & Layout Planning	Intended to fulfil all the desired needs of the District, Tehsil Administration, enhance the complex's aesthetic, and focus on the functional aspects of the proposed complex.	All structural, layout, and engineering designs of the district complex must comply fully with applicable laws, engineering standards, and prescribed technical parameters.	Completed.	PIU, C&W
2	Drainage	To prevent standing water, flooding, and water ponding in and around the buildings and circulation areas.	- Provision of appropriate drainage facilities and structures should be provided in the building complex; and - Proper slopes shall be incorporated in the design feature to avoid the formation of a water layer on	Completed.	PIU, C&W

			road surfaces in rainy seasons.		
4	Seismic Hazard	To minimize the structural damage	The proposed building and structures will be designed and constructed to withstand low to moderate earthquakes.	Completed.	PIU, C&W
5	Traffic Management	To minimize traffic problems in the project area	- Once the contractor is mobilized, in the first three months of the project time, he/she will prepare a comprehensive Traffic Management Plan and disclose it before construction begins, ensuring measures are in place to prevent traffic congestion and safeguard community convenience. Vehicle movements for transporting construction materials shall be strategically timed to minimize traffic impacts and avoid inconvenience to residents; - Plan the timing for the movement of vehicles carrying construction materials to reduce traffic load and avoid inconvenience to the residents;	To be prepared.	Contractor to provide a plan, PIU, C&W to ensure and monitor.
6	Health and Safety	To minimize health risks	- The contractor will prepare a detailed health and safety plan with all necessary and required mitigation measures that will minimize health risks to the surrounding community and the labor involved in construction. The proposed plan will be submitted to the PIU and will be made public before the construction activity begins; and - An emergency response plan will be formulated by the contractor that emphasizes a	To be prepared.	Contractor to provide a plan, PIU, C&W to ensure and monitor.

			line of action for rescue, medical emergencies, natural disasters, and firefighting operations at the construction site and will be submitted to PIU before the construction activity begins.		
7	Solid Waste Management	To manage (i.e., collect and dispose) the solid waste safely at appropriate sites.	The contractor will prepare a comprehensive solid waste management plan incorporating technical design features for refuse collection from the camp site and construction site, and its safe disposal to the existing solid waste dumping site at Khada, to ensure it does not burn at the site; and The contractor will devise plan(s) for safe handling, storage, and disposal of harmful waste and materials.	To be prepared.	Contractor to provide a plan, PIU, C&W to ensure and monitor.
Construction Phase					
1	Noise and Vibration	To minimize noise pollution and fulfill the Regulatory Compliance under the NEQs.	- Selection of up-to-date and well-maintained plant or equipment with reduced noise levels ensured by suitable in-built damping techniques or appropriate muffling devices; - Confining excessively noisy work to normal working hours in the day, as far as possible; - Restricting construction vehicles' movement during nighttime; - Avoid the use of heavy drill machines to avoid the vibration effect on the surrounding buildings; - Vehicles and equipment used should be fitted, as applicable, with silencers and properly maintained; - Use of low noise machinery, or machinery with noise shielding and absorption; - Contractor should comply with the submitted work	To be carried out.	Contractor Environmental Engineer (CEE), and Supervision Consultant (SC) to monitor.

			schedule, keeping noisy operations away from sensitive points; implement regular maintenance and repairs; and employ strict implementation of operation procedures; and ▪ Providing the construction workers with suitable hearing protection, like ear caps or earmuffs, and training them in their use.		
2	Soil Erosion	To minimize soil erosion and contamination.	▪ All kinds of oil spills from construction machinery on the ground shall be scrubbed until the clear surface of soil, and the removed clay shall be safely disposed of as desired, and the site will be restored to its original conditions; ▪ Unnecessary excavations should be avoided; ▪ Septic tanks connected to soakage pits of adequate capacities will be constructed for receiving and treating wastewater from all temporary worksite toilets and at the temporary container offices, if any; ▪ The toilet wastewater should not be discharged untreated onto the adjacent lands/sewers/disposal station; and ▪ Washout from washing of equipment and gadgets will be drained into either a septic tank or a sand-gravel bed for removal of the grit and contaminants.	To be carried out.	CEE, and Supervision Consultant (SC) to monitor.
3	Air Pollution	To minimize air pollution and fulfill the Regulatory Compliance under the NEQs	▪ All sites where excavation work will be carried out will be regularly sprinkled with water to control dust; ▪ The excavated material shall be covered and shall not be stored for long intervals;	To be carried out.	CEE, and Supervision Consultant (SC) to monitor.

			- Preventive measures like batching and mixing operations shall be performed in enclosed or controlled areas, installing screens around the mixing and unloading operation areas at the site, and no "Overloading" shall be enforced to prevent spillage of fine materials during transport operations; - All vehicles, machinery, equipment, and generators deployed during construction shall be maintained in sound working condition, regularly serviced (as prescribed by the manufacturer), and properly tuned to minimize exhaust emissions and ensure compliance with applicable environmental standards; - All vehicles, machinery, and equipment used for the construction shall be plugged off or switched off immediately after completion of their work to avoid idling conditions; - Emissions from power generators and construction machinery are important point sources at the construction sites. The filter shall be installed at the point sources of air emissions and shall be replaced regularly as prescribed by the manufacturer. Proper maintenance and repairs of the equipment are needed to minimize hazardous emissions; - Open burning of solid waste from the Contractor's camps should be strictly banned; - Construction workers should be provided with masks for		
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			protection against the inhalation of dust; and ▪ PEQS applicable to gaseous emissions generated by construction vehicles, equipment, and machinery should be enforced during construction works.		
4	Water Quality and Availability.	To protect the ground and surface water resources from any pollution due to the construction of the subproject and fulfill the Regulatory Compliance under the NEQs.	▪ Protection of surface and groundwater reserves from any contamination sources, such as construction and oily wastes that could degrade their potable quality; ▪ Wastewater effluent from the contractor's workshop and equipment washing yards should be passed through gravel/ sand beds to remove oil/ grease contaminants before discharging to the final disposal point; ▪ Water required for construction is obtained in such a way that the water availability and supply to nearby communities remain unaffected; ▪ For construction purposes, water shall be drawn from surface water bodies on priority from nearby Kalaya Khawar, located approximately 500 meters from the site; ▪ Regular water quality monitoring according to a determined sampling schedule provided in Table 6, below; ▪ The contractor shall ensure that construction debris does not find their way into the drainage network, which may get clogged; ▪ maintain natural drainage paths; ▪ Contractor and his/her staff will prohibit the flow from washing of machinery and	To be carried out.	CEE, and Supervision Consultant (SC) to monitor.

			vehicles in surface waters, provide sealed washing basins, and collect wastewater in a sedimentation/retention pond; Waste must not be disposed of into any surface water body.		
5	Solid, Construction Waste, and Hazardous Waste	To minimize the solid, construction, and hazardous waste	- Schedule training and awareness sessions for the workforce before the start of the construction work on the proper storage and handling of materials and chemicals that may pose a risk of soil contamination; - A comprehensive waste management plan shall be prepared by the contractor and implemented. All the solid waste generated during construction and from camp sites shall be safely managed and disposed of at the existing municipal solid waste site situated at Khada; - Burning of waste will be prohibited; - The hazardous waste shall be stored in closed containers, with proper labelling of containers, including the identification and quantity of the contents, hazard contact information. It will be safely disposed of in an EPA-registered hazardous waste facility within the province etc; - Training employees involved in the transportation of hazardous material regarding emergency procedures; - The solid waste will be disposed of in the existing municipal solid waste dumping site at Khada to protect the underground water from contamination	To be done.	CEE, and Supervision Consultant (SC) to monitor.

			▪ Providing the necessary means for emergency response on call 24 hours/day, like trained medical staff, First-aid and medical kits, Firefighting equipment (extinguishers, breathing apparatus, ambulance service etc ; ▪ The sewage system for the campsite will be properly designed (pit latrines or, as required, septic tanks) to receive all sanitary wastewaters; ▪ Lined wash areas will be constructed at the site for the receipt of wash waters from construction machinery; ▪ All the stored hazardous materials shall be securely covered to prevent any possible leakage during heavy rainfall; ▪ Locating stockpiles of material at such places to minimize potential visual impact; and ▪ Minimizing the land intake of stockpile areas as far as possible.		
6.	Removal, handling, and disposal of asbestos-containing materials with potential fiber release causing environmental contamination and serious chronic health effects, including lung cancer and mesothelioma.	To eliminate health risks to workers and the public by controlling, containing, and preventing the release of hazardous fibers into the environment.	During the demolition of buildings, once it is established that Asbestos material is present in the underground wastewater pipes of the old building to be demolished, the following measures will be ensured: ▪ A licensed and Qualified firm will be engaged to identify and plan for safe management, storage, and disposal of asbestos-containing materials; ▪ Use of specific PPEs will be ensured at the time of removal, storage, and disposal;	To be carried out.	PIU, CEE, SC

			▪ Apply a wetting agent (Water, etc) to reduce fiber release during the removal and storage process; ▪ Asbestos waste must be securely packaged: sealed, labeled, and placed in leak-tight containers or heavy-duty plastic bags; ▪ Asbestos-containing materials will be stored in closed containers away from direct sunlight, wind, and rain; ▪ Limiting access to waste storage areas to only those employees who have received proper training; ▪ Identifying (label) and demarcating the area, including documentation of its location on a facility map or site plan; ▪ All waste containers designated for off-site shipment should be secured and labeled with the contents and associated hazards, and be properly loaded on the transport vehicles before leaving the site; ▪ During transport, vehicles should be enclosed to prevent fiber release, and containers should remain intact; ▪ Safe disposal of the containers in the EPA, KP-registered hazardous waste facility in accordance with the EPA rules and standards within the province; and ▪ Area, equipment, and PPEs will be decontaminated.		
7	Health and safety of workers and associated communities	To reduce the health and safety risks to construction workers and the	▪ Obligatory insurance against accidents for laborers/workers shall be ensured;	To be done.	CEE, SC to monitor.

		nearby communities arising from general construction activities, with particular emphasis on hazards related to demolition works, working at heights, fire and explosion, slips, trips and falls, electro-mechanical hazards, exposure to hazardous materials and biological agents, and risks associated with unstable foundations.	- Basic medical training shall be imparted to specified work staff, and basic medical service and supplies to workers (first aid medical supplies and medicine, ambulance service) shall be made available at the site; - Layout plan for campsite, indicating safety measures taken by the contractor, e.g., firefighting equipment, safe storage of hazardous material, first aid, security, fencing, and contingency measures in case of accidents; - Work safety measures and good workmanship practices are to be followed by the contractor to ensure no health risks for laborers; - Protection devices (ear muffs) should be provided to the workers doing a job in the vicinity of high noise-generating machines; - Provision of protective clothing for laborers handling hazardous materials, e.g., a helmet, adequate footwear, protective goggles, and gloves, etc; - Ensure strict use of protective clothing and other necessary equipment during work activities; - Emergency number shall be placed at worksites; - Develop a contingency plan in case of major accidents such as fires, explosions, chemical spills, structural failures, or natural disasters; - The construction supervisor must ensure that only authorized workers shall be allowed inside the construction site boundary, and that all non-workers —		
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			including visitors, passersby, and especially children — are strictly prohibited from entering. The contractor shall develop a procedure/protocol to be followed by all official visitors at the specific site. The PIU, C&W shall approve the said procedure/protocol; ▪ There should be proper control on construction activities, and the oil spillage and leakage from vehicles could be controlled on site by conducting routine inspections of the engine, transmission, and hydraulic systems, checking and replacing worn-out seals, gaskets, hoses, and filters, and monitoring oil levels frequently to detect abnormal loss; ▪ Efforts will be made to create awareness about road safety among the drivers operating construction vehicles; ▪ Workers who shall be reported as ill or exhibit possible symptoms shall be restricted from entering the work site. They shall be promptly isolated and referred to local medical facilities for immediate care; ▪ The communicable disease of most concern during the construction phase, like sexually-transmitted diseases (STDs) such as HIV/AIDS, should be prevented by successful initiatives typically involving health awareness, education initiatives, training of workers in disease treatment, immunization programs, regular medical checkups of labor and staff,		
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			and providing health services; ▪ Reducing the impacts of vector-borne diseases on long-term health effects of workers should be accomplished through the implementation of diverse interventions aimed at eliminating the factors that lead to disease, which include prevention of larval and adult propagation of vectors through sanitary improvements and elimination of breeding habitat close to human settlements, and by eliminating any unusable impounding of water; ▪ A supply of safe drinking water will be made available and maintained at the project site(s); ▪ Chlorinated disinfecting spraying must be conducted at the work site(s); and ▪ Proper hygiene practices in the toilets and washrooms will be implemented with proper and adequate use of soaps and disinfectant spray; and In addition to the above general protective measures for the laborer and adjoining community, the contractor and his/her supervisory staff will provide and ensure the specific protective measures, such as: ● Provide training and awareness to the concerned staff on handling, storage, and safety of gas cylinders; ● Approved demolition plan, utility isolation, barricading, and dust suppression; ● Guardrails, certified scaffolding, safety nets,		
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			harnesses, and permit-to-work system; • Fire prevention plan, controlled storage of flammables, hot-work permits, provision and location of firefighting equipment; • Good housekeeping, clear walkways, adequate lighting, and spill control.		
8	Labor Camp	To minimize loss of assets and vegetation due to labor movements, to prevent environmental degradation from construction camps, and to ensure the camp's presence does not cause any concerns for the nearby community.	▪ All the workers staying in the camp will be issued ID cards for security purposes; ▪ Provision of all required medical health facilities (first aid boxes, reasonable stock of commonly used medicines) in the camp for emergency health services; ▪ The camps will be properly fenced and gated to prevent the entry of outsiders into the camp; ▪ Entry for the local community/any unauthorized persons at the campsite will be prohibited; ▪ Preparation of Waste Management Plan addressing the classification, storage, and disposal of all solid wastes and the training of employees for handling the hazardous materials; ▪ Training will be provided to all staff members and laborers on camp management rules and overall discipline, and cultural awareness; and ▪ The contractor will submit a labor camp management plan.	To be Established.	Contractor, PIU
9	Flora and fauna	To protect, conserve, and minimize the	▪ All efforts will be made to protect and conserve the existing trees and shrubs in	To be carried out once the construction	CEE, Supervision Consultant (SC), and PIU to monitor.

		impact on flora and fauna	the surroundings of the proposed site; ▪ The proposed subproject site has 10 trees present, having 04 Chinaberry (Bakayan) Trees (Melia azedarach), 01 Oriental Plane (Chinar) Tree, and 05 Acacia (Kikar/Babul) Trees. To create the required space for the proposed buildings, these existing trees are to be cut down. The contractor will plant 10 trees for each tree that is cut down of the same species. The cost of the additional plantation is covered in PC I of the subproject under "External Development" head; ▪ Contractor will provide gas cylinders at the camps for cooking purposes, and cutting of trees/bushes for fuel will not be allowed; ▪ Hunting and poaching of animals will be strictly prohibited, and the Contractor will warn their labor accordingly; ▪ The camps will be properly fenced and gated to prevent the entry of animals in search of edible goods; ▪ Waste from the camps will be properly disposed of to prevent the chances of being eaten by animals, which may become hazardous to them; ▪ Special measures will be adopted to minimize impacts on the birds, such as avoiding noise-generating activities during critical periods of breeding; and ▪ Staff working on the project should be given clear orders not to shoot, snare, or trap any bird.	activities are completed.	
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10	Traffic Management	To minimize traffic problems in the project area	- A proper traffic management plan will be prepared, by the contractor at the start of construction, in consultation with the PIU staff and implemented to avoid traffic jams/public inconvenience; - Movement of vehicles carrying construction materials should be restricted during the daytime to reduce traffic load and inconvenience to the residents; - Timely public notification on planned construction; - The contractor shall install and maintain appropriate safety and diversion signage at all construction areas, with special emphasis on sensitive locations and accident-prone sections of the road. Signage must be clearly visible, compliant with applicable traffic safety standards, and placed at a sufficient distance to adequately warn and guide road users, ensuring safe navigation around the construction zone; - Setting up speed limits in close consultation with the local stakeholders; and - The executing agency must maintain liaison between the residents/visitors, travelers, and the contractor to facilitate traffic movement during the construction stage.	To be prepared before the construction begins.	Contractor Traffic Engineer, SC, and PIU.
11	Communicable diseases	To minimize the spread of Communicable diseases	A communicable disease prevention program will be prepared by the contractor for construction workers or residents near the construction sites and made public before the construction work started. Reporting employees and laborers showing symptoms	To be prepared before the construction begins.	Contractor H&S person.

			such as fever or high body temperature, coughing, difficulty breathing, or chest pain, and sending them to a clinic or the nearest hospital immediately; - Awareness and implementation of the Quarantine Procedure for all employees who have come back from vacation; - Ensure Disinfection of offices, work areas, and machinery periodically; and - Provision of face masks, instruction boards, and signage at different locations for health hazards awareness.		
Operational Phase					
1	Natural Hazard	To minimize the risk of structural collapse and flooding in the Tehsil complex	- A technical committee, formed by the District Administration, will carry out detailed scrutiny inspection of all the Engineering drawings of the buildings to ensure that the foundation and the structure are strong enough to withstand normal conditions of earthquake impacts; - Inspections should be conducted at three-month or six-month intervals, by qualified personnel to ensure the integrity of structures; and - Develop an emergency response plan for the rainwater flooding in the sup project site.	To be carried out on completion of construction.	PIU
2	Waste	To minimize and store the solid waste	An appropriate waste management system shall be in place during the operational phase. It will integrate technical measures (segregation, treatment, disposal), administrative controls (planning, monitoring, compliance),	To be prepared.	PIU

			and community engagement (awareness, collaboration) to ensure sustainability and regulatory alignment.		
3	Drainage	To prevent flooding and pooling	Routine inspection and maintenance of the drainage system, to make sure that the drains are not blocked due to solid waste, shall be scheduled and implemented.	To be carried out.	PIU
4	Flora	To maintain flora in the district complex	- Routine monthly inspection will be carried out to check the maintenance of the Tehsil complex; - Weeds will be monitored weekly and removed no less than every two weeks; - Any tree that poses a concern to public safety will be immediately barricaded and evaluated by an ecologist. Issues of immediate concern would be trees or branches that are leaning or broken, that may fall onto an area of pedestrian or vehicular activity; - The use of fertilizers in open spaces shall be strictly monitored to prevent incidents such as direct human contact or ingestion by birds; and - Natural nutrients should be preferred.	To be carried out.	PIU

Environmental Monitoring is undertaken during both the construction and operational phases to ensure the effectiveness of the proposed mitigation measures. Certain environmental parameters are selected, and quantitative & qualitative analyses will be carried out by the contractor from an EPA, KP's registered laboratory. The results of the analysis will be compared with the guidelines, standards, and pre-project conditions to determine whether the EMP and its implementation are effective in mitigating impacts.

Parameters to be analyzed during pre-construction, construction & operation of the project, responsibilities for monitoring have been discussed and provided in Tables 5 to 7 below:

Table 5: 'Pre-Construction' Monitoring Plan for Baseline Development

Parameter to be measured	Objective of Monitoring	Parameters to be Monitored	Measurements	Location*	Frequency	Responsibility
Ambient Air Quality	To establish a baseline for air quality levels	CO, NO ₂ , SO ₂ , O ₃ , PM _{2.5} & PM ₁₀ (particulate matter smaller than 10 microns) concentration at the receptor level	1-hr and 24-hr concentration levels	At three random receptor locations in the project area	Once	CEE
Ambient Noise	To establish a baseline for noise levels	Ambient noise level near the receptors in the project area	A-weighted noise levels –24 hours, readings taken at 15s intervals over 15 min. every hour, and then averaged	At three random receptor locations in the project area	Once	CEE
Groundwater Quality	To establish the groundwater quality in the project area	Groundwater quality in the project area	Water samples for comparison against NEQS parameters	At two locations around the site in the project area	Once	CEE
Surface water quality	To establish surface quality in the project area	Surface water quality in the project area	Water samples for comparison against NEQS parameters	At two locations around the site in the project area	Once	CEE

* Monitoring Locations to be finalized jointly between PIU Safeguards staff and the Supervision Consultant (SC).

Table 6: Construction Phase Monitoring Requirements

Project Activity and Potential Impact	Objective of Monitoring	Parameters to be Monitored	Measurements	Location	Frequency	Responsibility
Noise Disturbance due to noise from	To determine the effectiveness of noise abatement measures on	Ambient noise level at different locations in the project area	A-weighted noise levels – 24 hours, readings taken at 15 s intervals over 15 min. every hour at 15	At five random receptor locations in the	Quarterly basis on a typical working day	Contractor's Environmental Officer, SC

construction activity	sound pressure levels		m from the receptors, and then averaged	project area		
Air Quality Dust emissions from construction vehicles and equipment	To determine the effectiveness of the dust control program on dust at the receptor level	CO, NO ₂ , SO ₂ , O ₃ , PM _{2.5} & PM ₁₀ (particulate matter smaller than 10 microns) concentration at the receptor level	1-hr and 24-hr concentration levels	At five random receptor locations in the project area	Quarterly basis on a typical working day	Contractor's Environmental Officer, SC
		Visible dust	Visual observation of the size of dust clouds, their dispersion, and the direction of dispersion Water sprinkling to settle down the dust.	Constructi on site At the location of the digging Area	Once daily during the peak construction period As and when the dust appears at the construction site	Contractor's Environmental Officer, SC
Groundwater Quality	To establish the groundwater quality in the project area	Groundwater quality in the project area	Water samples for comparison against NEQS parameters	At five locations around the site in the project area	Quarterly	Contractor's Environmental Engineer (CEE), SC
Safety precautions by workers	To prevent accidents for workers and the general public	The number of near-miss events and accidents taking place	Visual inspections	Constructi on site	Once Daily	Contractor's Environmental Engineer (CEE), SC
Soil Contamination	To prevent contamination of soil from oil and toxic chemical spills and leakages	Incidents of oil and toxic chemical spills	Visual inspections and conducting soil analysis	At constructio n sites and vehicle and machinery refuelling & maintenanc e areas	Once a month	Contractor's Environmental Engineer (CEE), SC

Solid Waste & Effluent Disposal Insufficient procedures for waste collection, storage, transportatio, and disposal	To check the availability of the waste management system and its implementation	Inspection of solid and liquid effluent generation, collection, segregation, storage, recycling, and disposal will be undertaken at all work sites in the project area	Visual inspections	At work sites in the project area	Once daily.	Contractor's Environmental Engineer (CEE), SC
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* Monitoring Locations to be finalized jointly between PIU Safeguards staff and the Supervision Consultant (SC).

Table 7: Operation Phase's Environmental Monitoring Plan

Parameter to be measured	Objective of Monitoring	Parameters to be Monitored	Measurements	Location	Frequency	Responsibility
Solid Waste Management	To assess whether solid waste generated from the district complex is managed as per EMP requirements	All waste being generated is being managed and disposed of as per international good practices	Solid waste inventory audit	District Complex premises	Bi-Annual	PIU, District Administration

5.2 Relocation of Employees

The proposed subproject, apart from the construction of new buildings for the Tehsil complex, will involve the demolition of 16 existing residential quarters, which are in a deteriorated condition. These quarters will be demolished to create the required space for the construction of the proposed buildings. There are officials and their families living in these quarters, and therefore, they will be temporarily displaced from their present quarters. A total of 30-40 people (comprising 3 families and several bachelor staff members) are residing in these existing quarters that will be temporarily displaced from their present accommodation. The issue of temporary displacement was discussed with the Tehsil Administration, and they informed that families and individuals living in these premises are permanent Government Employees and, therefore, it is the responsibility of the Tehsil Administration to arrange and provide alternate accommodation within the existing premises or arrange accommodation outside for them during the construction of a new residential building. The PIU will continuously follow up with the Tehsil Administration for the timely implementation of the relocation arrangements of the employees. No demolition or civil works will commence until all affected government employees and their families have been fully relocated, in accordance with the approved Relocation Protocol. It will be ensured by the PIU, C&W, that no staff or their family members are present in the buildings before their demolition. Also, before demolition of the building, general protective measures like ensuring workers use appropriate personal protective equipment (PPE), controlling dust and noise, securing the site with fencing and exclusion zones, and planning the demolition to proceed systematically from the top down. Also, a

“Relocation Protocol” has been finalized and is in place. The Relocation Protocol will be fully implemented before the commencement of any demolition or civil works. Key provisions of the Relocation Protocol include: (i) confirmation of alternate accommodation arrangements for all 3 families and bachelor staff by the Tehsil Administration before displacement; (ii) a timeline and schedule for relocation agreed between the PIU and Tehsil Administration; and (iii) a designated focal point within the PIU for monitoring compliance and addressing any relocation-related grievances through the project GRM, which will ensure all the requirements for the relocated officials and their families are met by the respective Tehsil Administration before their temporary relocation.

5.3 Grievance Redress Mechanism (GRM)

The Grievance Redress Mechanism (GRM) is an institutional arrangement which provides the project’s stakeholders an opportunity and a structured mechanism to submit their concerns. The grievance redress mechanism will focus on the following steps/points during the implementation process:

- Record grievances, both written and oral, categorizing and prioritizing them, and providing solutions within an agreed-upon timeframe;
- Reporting to the aggrieved parties about the resolutions regarding their grievances and the decision;
- Dissemination of various reporting channels such as complaint boxes, complaint register, PIU phone numbers, online complaint registration, and proformas for complaints.
- All information about grievance procedures, grievance forms, and responses will be available in languages readily understandable to the locals.
- During GRM orientation, inform labor and associated staff about alternative reporting channels, including the GRM register, telephone numbers, and online portals, in addition to the GRM boxes.
- All complaints received will be treated with confidentiality.

Confidential SEA/SH Grievance Handling Mechanism

- A separate intake channel will be established for GBV/SEA/SH complaints.
- A female focal point will be designated to handle SEA/SH-related grievances.
- Confidential reporting options will be available, including sealed envelopes, a dedicated phone line, and reporting through female staff.
- All SEA/SH cases will be immediately referred to GBV service providers.
- A survivor-centered approach will be followed at all stages of case management.
- A written complaint will not be required for reporting SEA/SH incidents.
- No details of SEA/SH cases will be shared with the general GRC mechanism.

The Grievance Redress Mechanism (GRM) is an effective tool for early identification, assessment, and resolution of concerns, complaints, and suggestions. A key emphasis will be to quickly respond to all highlighted and reported concerns or grievances, as per the KPRIISP GRM Manual.

SEA/SH Referral Pathway

In cases involving GBV/SEA/SH, a survivor-centered referral pathway shall be followed in accordance with the **KP-RIISP Survivor-Centered SOPs (July 31, 2025)**. Upon receipt of a complaint, the case will be handled confidentially and immediately referred (within 24–48 hours) to the designated GBV focal person at the PIU and PCMU levels.

The response shall follow a structured approach prioritizing the survivor’s safety, dignity, and informed consent, including:

- **Immediate Safety and Medical Assistance:**

The priority shall be to ensure the survivor’s safety and facilitate access to medical care through nearby public health facilities (e.g., DHQ/THQ hospitals), where required.

- **Confidential Case Handling and Reporting:**

Cases shall be documented in a secure and anonymized manner and reported only to authorized GBV focal persons, ensuring strict confidentiality and adherence to “do no harm” principles.

- **Referral to Accredited Service Providers:**

With the survivor’s informed consent, referrals shall be made to appropriate services, including:

- **Health services:** Survivors will be referred to nearby public health facilities such as District Headquarters (DHQ) Hospitals, Tehsil Headquarters (THQ) Hospitals, or Basic Health Units (BHUs) for medical care, emergency treatment, and medico-legal support where required.
- **Psychosocial support:** Counseling and emotional support services will be facilitated through relevant government and partner organizations, including the Khyber Pakhtunkhwa Social Welfare Department, community-based organizations, and available protection service providers.
- **Legal assistance:** Where the survivor opts to pursue legal action, referrals will be made to appropriate legal aid channels, including the Khyber Pakhtunkhwa Police, District Legal Empowerment Committees, and other relevant legal support institutions.
- **Protection and shelter services:** Safe shelter and protection support will be facilitated through government-run facilities such as Dar-ul-Aman or other safe spaces managed by the Social Welfare Department.

- **Helplines and Institutional Support:**

Survivors may also access support through available government systems, including Social Welfare Department services and national/provincial helplines.

- **Follow-up and Case Closure:**

Follow-up shall be conducted (with consent) within 24–72 hours and subsequently as needed to ensure the survivor’s well-being. Case closure shall only occur when the survivor confirms that no further support is required.

All actions shall be based strictly on the survivor’s informed consent. Survivors shall not be required to file a formal grievance to access services, and no identifying information shall be recorded in general GRM logs.

Grievance Registration and Resolution Process

Submission: Complainants can lodge grievances through:

- **Focal Person:** Deputy Director (Environment & Social), PIU C&W KP-RIISP
- **Phone:** +92 91 9224272
- **Email:** usmanshinwari179@gmail.com
- **Website:** <https://www.cwd.gkp.pk/projects/KP-RIISP>
- **In person/letter:** House No. 8-BC, Park Road, University Town, Peshawar, Khyber Pakhtunkhwa
- **Complaint Box/Registers** at site offices

Recording and Categorization: All grievances (oral or written) will be registered, categorized (urgent/regular), and logged in a centralized GRM database.

Investigation and Resolution:

The Deputy Director (E&S) will coordinate with C&W PIU staff or field officers to investigate the issue. The resolution will be shared with the complainant within the agreed timeframe.

To ensure timely and transparent handling of grievances, the following resolution timelines shall apply:

- **Acknowledgment:** All grievances will be acknowledged within 48 working hours of receipt.
- **Tier 1 – Initial Review (PIU Level):** Regular grievances will be investigated and resolved within 14 working days of registration.
- **Complex / High-Risk Cases:** Grievances categorized as urgent, sensitive, or complex may require extended review and will be resolved within 21 working days.
- **Tier 2 – Escalation to PCMU:** If escalated, the PCMU shall provide a final decision within 30 working days of receiving the appeal.

- **SEA/SH Complaints:** Cases involving GBV/SEA/SH will be referred immediately (within 24–48 hours) to the designated focal person and handled confidentially in accordance with the Project’s GBV Mitigation Action Plan, following a survivor-centered approach. Such cases will not be recorded in public logs.

Follow-up and Feedback:

The complainant will be informed in writing (or preferred method) of the decision/resolution and any follow-up actions.

Appeal and Escalation Mechanism:

If not satisfied, complainants may escalate the issue to:

- o **Project Coordination & Management Unit (PCMU), P&D Department**
 - **Focal Person:** Senior Social Development Specialist
 - **Phone:** 091-9213022
 - **Email:** ssds@kp-riisp.gov.pk
 - **Address:** Civil Secretariat, Peshawar, KP

SEA/SH complaints:

- SEA/SH complaints will not be entered into the general complaint register.
- All SEA/SH cases will be recorded in a restricted-access confidential log.
- The identity of the survivor will not be disclosed under any circumstances.
- SEA/SH complaints will not be discussed in general Grievance Redressal Committee (GRC) meetings.
- Such cases will be managed only by a designated gender or GBV focal person.

Grievance Redress Committee (GRC)

To support timely grievance handling, a Grievance Redress Committee (GRC) will be formed at the PIU level. The GRC will meet regularly (or as needed) to address escalated or complex grievances.

Composition of GRC (PIU C&W):

Designation/Organization	Position in PIU GRC
PD PIU C&W	Head/convener of GRC
DD E&S PIU C&W	Secretary of GRC
DD Procurement Specialist PIU C&W	Member
Tehsil/District Focal Person	Member
Contractor	Member
Community Representative(s)	Member
Environment/Social/Gender Specialist, Meinhardt Consultant, PIU C&W	Observer
Co-opted/Invited member(s) E.g., complainant, lawyer, relevant govt. Official, etc	Member/Observer

Composition of the GBV GRC (PIU C&W):

Composition	Status
Project Director, PIU C&W, KP-RIISP	Chairman
Deputy Director, Procurement Specialist, PIU C&W, KP -RIISP	Secretary / Member
Deputy Director, (E&S), PIU C&W, KP-RIISP	Member
Gender Specialist (Female), Meinhardt Consultant, PIU C&W, KP-RIISP	Member
Social Specialist, Meinhardt Consultant, PIU C&W, KP-RIISP	Observer
Any Co-opt member	Member/observer

Working Arrangements:

The GRC meeting will be held at the PIU or any other location agreed upon by the Committee. If needed, GRC members may undertake field visits to verify and review the dispute issues.

If the affected person is not satisfied with the decision of GRC at PCMU, then it can be referred to the Project Steering Committee for resolution. If the complainant does not accept the resolution, or chooses to accept it, this will be confirmed in writing. The complainant may also seek redress through courts or other mechanisms available in case of non-acceptance.

GRM Awareness and Capacity Building

- Awareness sessions will be conducted for laborers, contractors, local communities, and other stakeholders.
- Orientation on GRM channels, procedures, and available support will be integrated into community consultations and labor inductions.
- GRM posters, brochures, and contact details will be displayed at all construction and project sites.
- GRC members to be trained on GBV, SEA/SH, survivor-centered approach & confidential complaint intake procedures.

5.4 Capacity Building and Training

To raise the level of professional and managerial staff, there is a need to upgrade their knowledge in the related areas. The SC will play a key role in this respect and supervise the arrangements for training.

The contractor's environmental awareness and appropriate knowledge of environmental protection are critical to the successful implementation of the ESMP. Without appropriate environmental awareness, knowledge, and required skills for the implementation of mitigation measures, it will be difficult for the contractor's workforce to implement effective environmental protection measures. A suitable training program is proposed to train the Contractor's staff who will be involved in the Construction Phase and the professional staff from the client involved at the operational stage of the project—orientation sessions for community members on the availability and confidential use of GBV-sensitive GRM channels. The details of this training program are presented in Table 8 below.

Table 8: Personnel Training Program

Provided by	Contents	Trainees/Events	Duration
Consultants/ organizations Specializing in environmental management and monitoring	Short training session, on: Environmental laws and regulations, E&S implementation obligation, daily monitoring and supervision, ESMP monitoring, Compliance reporting, and corrective action procedures.	Two training sessions, one For PIU staff and one for Contractor project staff	2 Days
Consultants/ organizations specializing in Occupational health and Safety	Short lecture relating to Occupational Safety and Health	One seminar for contractor's staff	1 Day
Consultants/ organizations specializing in Grievances Redressal Mechanism	Training session on What is GRM, and how It's working, and who to be approached for redressal of complaint, and awareness session on GBV& SEA/SH and its associated elements	One session for the Surrounding Community (Including women-only Awareness session.)	1 Day
Consultants/organizations Specializing in GRM/SEA/SH Awareness sessions	Women-only session on GRM access, SEA/SH Reporting pathways, Survivor-centered support, & confidentiality assurance.	Female community Members & female Workers	1 Day

5.5 Institutional Arrangements and Roles

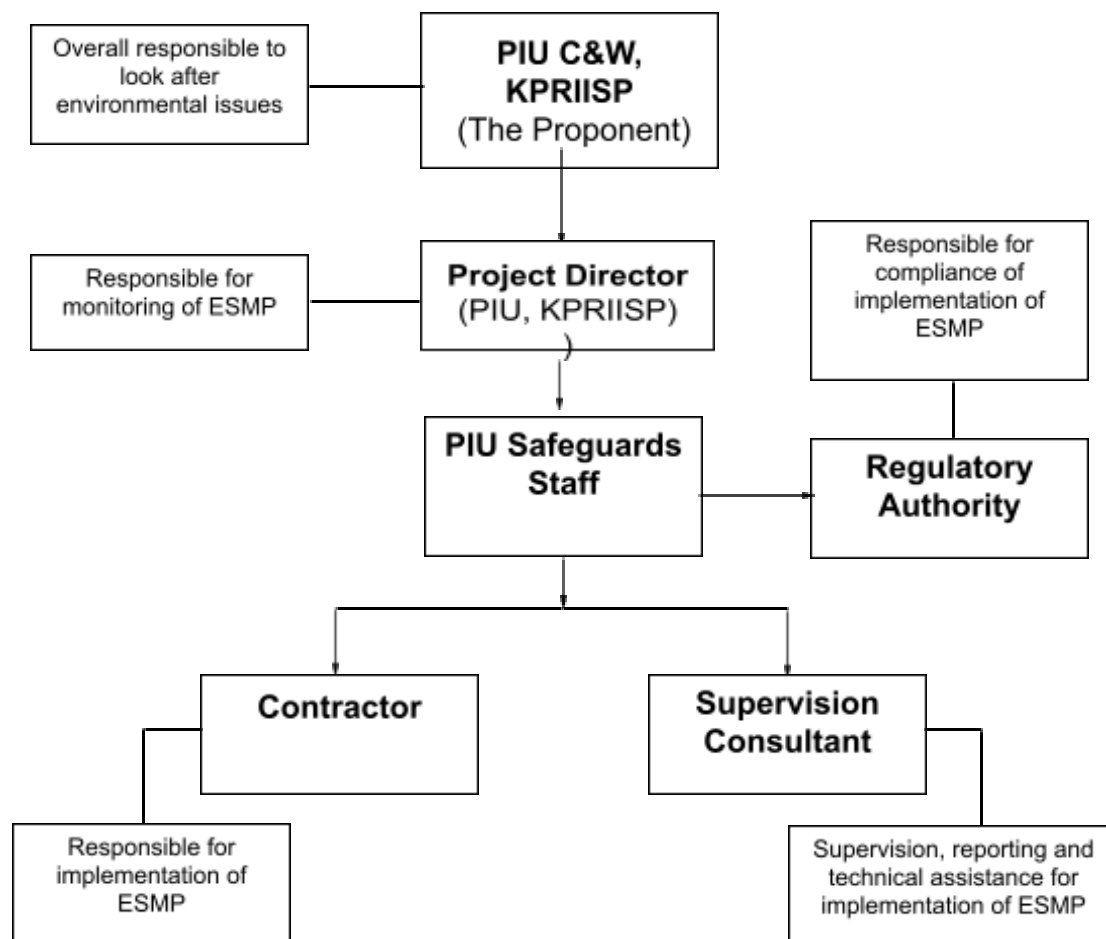
The main purpose of the ESMP is to provide a strategy for environmental protection. According to ESMP, all the activities associated with the project will be controlled and monitored during the design, construction, and operation phases. EMP will propose a plan of action that will indicate responsibilities and required measures to prevent or minimize the potential environmental impacts.

The following functionaries will be involved in the implementation of ESMP:

- Project Implementation Unit (PIU);
- Supervision Consultant's Environmental Engineer;
- Contractor's Site Environmental Engineer; and
- EPA, KP (Regulatory Authority)

The organizational set-up for the implementation of ESMP is shown in **Figure 1** below.

Figure 1: Organizational Setup for Implementation of ESMP



The PIU C&W will be overall responsible for the implementation of this ESMP and the environmental management and supervisory affairs during the construction phase of the proposed project. For effective environmental management, the PIU will assign the necessary responsibilities through the Project Director to an Environmental Expert and a Social Expert in implementing the mitigation measures proposed in the ESMP. The PCMU will monitor the overall implementation of the respective ESMP to make sure all the recommended protective and safety measures are implemented in its later letter and in spirit.

The ESMP will be part of the Bidding documents. On mobilization of the contractor for the subproject implementation, the contractor will prepare and submit the Contractor Social Management Plan (CESMP) to the PIU. The Contractor will be responsible for the implementation of ESMP under the Supervision Consultant. The Contractor shall be bound to follow the provisions of the Contract documents, especially regarding environmental protection, and apply good construction techniques and methodology without damaging the environment. The Contractor must safeguard, mitigate adverse impacts, and rehabilitate the environment should be addressed through environmental provisions in the Contract document and through adequate implementation at the site. The Regulatory Authority will be responsible for the compliance with the implementation of ESMP.

5.5.1 Project Implementation Unit (PIU)

Design and Construction of the project is the core responsibility of PIU, C&W. The major role and responsibilities related to environmental and social tasks are as follows:

- To ensure that the Project design and specifications are adequately reflected in the ESMP.
- To ensure the Project's compliance with the environmental regulations and donor requirements.
- Setting up systems for environmental management.
- Ensuring that the Contractor(s) develop their own, and carry out, Environmental Management Plan that are consistent with the ESMP;

5.5.2 Responsibilities of the Environmental Engineer of the Supervision Consultant

The Environmental Engineer (EE) of the Supervision Consultant (SC) will oversee the performance of the Contractor through periodic monitoring to make sure that the Contractor is carrying out the work following ESMP.

The EE of SC will provide guidance to the Contractor's Environmental Engineer for implementing each of the activities as given in the ESMP. The EE of SC will be responsible for record keeping, providing instruction through the Resident Engineer (RE) for corrective actions, and ensuring compliance with various statutory and legislative requirements. The EE will maintain close coordination with the Contractor and PIU for the successful implementation of environmental safeguard measures. However, the overall responsibilities of the EE of SC are as follows:

- Directly reporting to the RE;
- Discussing various environmental issues and environmental mitigation, enhancement, and monitoring actions with all concerned directly or indirectly;
- Inspect, supervise, and monitor all the construction and allied activities related to the EMP for the project
- Assist the RE to ensure the environmentally sound engineering practices;
- Assisting the contractor and PIU in all matters related to public contacts, including public consultation on environmental and community health & safety issues;
- Assisting PIU Safeguards staff to carry out environmental monitoring;
- Organizing training for the EE of Contractor and field staff; and
- Preparing and submitting monthly and quarterly environmental progress/ compliance reports to the PIU.

5.5.3 Responsibilities of the Environmental Engineer of the Construction Contractor

The Site Environmental Engineer of the Construction Contractor will carry out the implementation of mitigation measures at the construction site. The Construction Contractor will be bound through the Contract documents to appoint the Site Environmental Engineer with a relevant educational background and experience. Responsibilities of the EE of the Contractor are as follows:

- Preparing sub plans, including monitoring plan, traffic control/diversion plan, site rehabilitation plans, etc., and will submit all the plans to the EE of SC.
- Implementation of ESMP and taking effective measures against the corrective actions plan;
- Preparing the compliance reports as per the schedule and will submit them to the SC;
- Providing proper Personal Protective Equipment (PPEs) to the workers and training them for their proper use; and
- Providing environmental and health & safety training to the workers /labor.

5.6 Labor Camp Management

Campsite will be selected in consultation with the Tehsil Administration, PIU C&W at a suitable location once the contractor is mobilized on site on an adequate area for establishing camp sites, including parking areas for machinery, stores, and workshops, access to local markets, and an appropriate distance (500 meters to 600 meters) from sensitive areas and existing residences in the vicinity, the specific details of the labor camp management are provided in Annexure-8. It is anticipated that around 10-15 laborers will be present at the camp during the construction phase of this subproject. The area required for construction camps will depend upon the deployed manpower and the type and quantity of machinery mobilized; however, the estimated area required is 1000-1500 square yards for each campsite. Given the required area, two probable sites have been identified and locations shown in Map-1 of Annex 3. However, CESMP (CESMP will be prepared by the contractor before the start of construction) and other local considerations will be considered before the final selection of the campsite.

5.7 Occupational Health and Safety

Occupational Health and Safety (H&S) related impacts will arise during construction stage activities, including clearing of earth, levelling, compaction, pavement finishing, and testing & commissioning. The falls during inspection or maintenance of pile rigs, steel fixing bridges, framework erection, and other related activities may also occur. Eye injury can be caused by stone or metal particles. The hazards of being hit by falling objects, major hand-arm and whole-body vibration hazards, skin and respiratory tract irritation from exposure to cement dust, overexertion, awkward postures, etc., will be another impact. Welding hazards include electric shock, fumes and gases, fire and explosions, falls from height, eye and head injuries, etc. The contractor will take all protective measures and provide the Personal Protective Equipment to the laborers during the construction to minimize the OSH risks and ensure the safety of the laborers at the site. The contractor will prepare a Site Specific OH&S plan; the main components of the plan are provided in Annexure-9, and submit to PIU. Strict monitoring by the PIU and the Supervision Consultant team will be conducted during the construction stage to ensure compliance with the ESMP mitigation and safety measures.

5.8 GBV/SEA/SH Risk Mitigation

To mitigate risks of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH), the contractor will develop a site-specific Code of Conduct (CoC) and Grievance Redress Mechanism (GRM) in line with the approved KPRIISP GRM Manual (May 2025). These documents will be submitted to the PIU for review and approval within 30 days of contract signing and before the commencement of civil works. The CoC will be signed by all workers, including subcontractors, and refresher GBV/SEA/SH awareness trainings will be conducted regularly. KPRIISP Code of Conduct (GBV and SEA/SH Prevention) is attached as Annex-10.

Sanctions for Code of Conduct Violations

Include:

- Verbal warning will be issued for minor violations.
- Written warning will be issued for repeated or moderate violations.
- Suspension may be applied depending on the severity of the violation.
- Termination of employment or contract may occur in cases of serious or repeated violations.
- Contractual penalties will be imposed where applicable under the agreement.
- Reporting to relevant authorities will be done in cases involving criminal offenses.

The GRM will include confidential reporting channels and survivor-centered protocols for handling GBV-related complaints. The PIU will monitor compliance, maintain oversight of CoC implementation, and facilitate referral of survivors to appropriate support services. Detailed procedures for confidential grievance handling and referral pathways are provided in Section 5.3 Regular awareness sessions will be conducted for workers and community members regarding the availability of a confidential GBV-sensitive GRM. Information materials will include hotline numbers, confidential complaint channels, and survivor-centered reporting procedures. Staff will conduct women-only sessions to ensure cultural appropriateness.

Mandatory induction training on GBV/SEA/SH prevention, Code of Conduct (CoC) compliance, and confidential grievance reporting procedures shall be provided to all project workers before site mobilization. Refresher training sessions will be conducted every six months, and additional targeted sessions will be organized before any major workforce changes or influx of new workers. Training attendance and records shall be properly documented and maintained by the PIU for monitoring and compliance purposes.

5.9 Budget for ESMP Implementation

Environmental Monitoring is undertaken during both the construction and operational phases to ensure the effectiveness of the proposed mitigation measures. Certain environmental parameters are selected, and quantitative & qualitative analyses are carried out. The results of the analysis are compared with the guidelines, standards, and pre-project conditions to determine whether the EMP and its implementation are effective in mitigating impacts. This section discusses parameters to be analyzed during the project's construction and operation, responsibilities for monitoring and reporting, and monitoring costs. Tables 9 to 13 below provide the respective monitoring to be conducted during the subproject development phases: the Pre-Construction Phase, Construction, and Operation Phases.

Table 9. Cost Estimates for 'Pre-Construction Phase' Environmental Monitoring

Monitoring Component	Parameters	Quantity	Amount PKR	Details
Air Quality	CO, NO ₂ , SO ₂ , O ₃ , PM _{2.5} , & PM ₁₀	3 (1 time at 5 locations)	90,000	3 readings @ PKR 30,000 per sample
Noise Levels	dB(A)	3 (1 time at 5 locations)	90,000	3 readings @ PKR 30,000 per reading
Ground Water Quality	NEQS	3 (1 time at 5 locations)	90,000	2 readings @ PKR 30,000 per sample
Contingencies			27,000	10% of the monitoring cost
Total (PKR)			297,000	

1. For air quality monitoring: 'Passive samplers', such as test tubes, can be used, or 'Active samplers' with sorbent tubes can also be used.
2. For noise monitoring, sampling equipment with a duration greater than 1 hour can be used.

Table 10: Cost Estimates for 'Construction Phase' Environmental Monitoring

Monitoring Component	Parameters	Quantity	Amount PKR	Details
Air Quality	CO, NO ₂ , SO ₂ , O ₃ , PM _{2.5} & PM ₁₀	12 (Quarterly basis at 5 locations)	360,000	12 readings @ PKR 30,000 per sample

Noise Levels	dB(A)	12 (Quarterly basis at 5 locations)	360,000	12 readings @ PKR 30,000 per reading
Ground Water Quality	NEQS	8 (Quarterly basis at 5 locations)	240,000	8 readings @ PKR 30,000 per sample
Contingencies			67,200	5% of the monitoring cost
Total (PKR)			1,027,200/-	

Table 11: Cost Estimates for 'Operation Phase' Environmental Monitoring

Monitoring Component	Parameters	Quantity	Amount PKR	Details
Waste Management	Solid Waste	Quarterly	200,000	Four times @ PKR 50,000
Total (PKR)			200,000	

Table 12: Cost Estimates for Environmental Mitigation

Activity	Basis	Cost (Rs.)
Medical screening for workers	Rs. 5000 per employee, and for 30 employees	150,000
Material Storage, handling, and use	Three (03) No. of tarpaulins of Rs. 25,000 each	75,000
Handling of hazardous waste and safe storage	Lump sum cost of the containers, marking, and safe storage before disposal.	500,000
Handling/ transportation of hazardous material	Rs. 30,000/month for 12 months will be required for the transportation of materials	360,000
Asbestos material screening, storage, and management.	The cost includes screening, handling, storage, transportation, and disposal.	1,500,000
Handling of solid waste	Rs: 21,000 per month (three trips per month) for 12 months, which includes the cost of collection, transportation, and disposal to the designated site. It includes the cost of 3 dustbins to be placed at the construction site.	270,000
Cost of Personal Protective Equipment (PPE)*	For 15 employees for the provision of dust masks, safety shoes, gloves, safety helmets, a first aid box, and ear plugs	714,000
Cost of environmental training	Lump sum	650,000
Disease Management Cost	Lump sum	400,000
Grand Total		4,619,000/-

Table 13: Cost Estimates and Break-up of Personal Protective Equipment (PPEs)

Items	Quantity	Cost / Item (Rs.)	Total Cost (Rs.)
Dust masks	2000	20	40,000
Safety Shoes	100	2000	200,000
Gloves	1200	300	360,000
Safety Helmet	60	900	54,000
First Aid Box	3	8000	24,000
Ear Plugs	1200	30	36,000
Total			714,000/-
Time required for Construction = 36 months			
Number of laborers required during construction = 15			
Dust mask	1 dust mask to be used for a week by each laborer		
Safety Shoes	1 safety shoe for six months for each laborer		
Gloves	2 pairs of gloves for each laborer for a month		
Safety Helmet	1 safety helmet for each laborer for 12 months		
First Aid Box	1 first aid box at each work site within the subproject site		
Ear Plug	1 set of earplugs to be used for 1 month for each laborer		

Table 14: Total Cost for ESMP Implementation

Serial No.	Activity	Cost in PKR
1.	Cost Estimate for 'Pre-Construction Phase' Environmental Monitoring	297,000/-
2.	Cost Estimate for 'Construction Phase' Environmental Monitoring	1,027,200/-
3.	Cost Estimate for 'Operation Phase' Environmental Monitoring	200,000/-
4.	Cost Estimate for Environmental Mitigation Cost	4,619,000/-
5.	Cost Estimate and Breakdown of PPEs	714,000/-
6.	Cost Estimate for Environmental and Social Engineer, with intermittent input of 9-man-months @ PKR 150,000/ per month.	1,350,000/-
	Total	8,207,200/-

5.10 Reporting Requirements

5.10.1 Monitoring and Reporting Responsibilities

An ESMP can only be effective if it is regularly monitored and the results are reported to the appropriate authority, ensuring that the proposed mitigation measures are properly implemented on the ground. An environmental monitoring checklist is placed at Annexure-11. Monitoring and reporting of outcomes are shared responsibilities among all project partners. The roles and responsibilities for monitoring and reporting are distributed among the partners as follows:

- **Implementing Agency/Contractor:** Responsible for daily/weekly environmental and social monitoring and internal reporting.
- **Supervisory Consultants:** Responsible for reviewing contractor reports and submitting periodic consolidated reports to the project management unit.
- **Environmental and Social Specialists:** Oversee proper ESMP implementation and conduct spot checks.

The monitoring report will be prepared by the Supervision consultant, submitted to PIU for review, the PIU will submit the same to PCMU for their review, and finally, the PCMU will submit it to WB, and EPA KP.

5.10.2. Types of Reports Required

The table below outlines the types of reports to be prepared, their required frequency, their intended purpose, and the parties responsible for their preparation and submission.

Table 15: Types, frequency and purpose of reports

Serial No	Report Type	Frequency	Purpose	Responsible Party
1	Daily Site Report	Daily	To monitor compliance with ESMP mitigation measures on-site	Contractor
2	Weekly Monitoring Report	Weekly	Summarizes environmental and social performance, any incidents or complaints	Contractor
3	Monthly Progress Report	Monthly	Overview of ESMP implementation, mitigation actions, non-compliance, and grievances	Contractor
4	Quarterly Environmental and Social Monitoring Report (ESMR)	Quarterly	Comprehensive review of ESMP performance indicators and compliance	Supervising Consultant
5	Incident/Accident Report	As needed	Immediate reporting of major incidents, including GBV & SEA/SH affecting the environment or community	Contractor and Supervising Consultant
6	Grievance Redress Reports	Monthly	Track grievances received, status of resolution, and time taken	Grievance Redress Mechanism (GRM) focal point

5.10.3. Stakeholder Reporting

An effective stakeholder reporting process ensures transparent communication, fosters accountability, and keeps all relevant parties informed about the project's progress, challenges, and compliance with environmental and social safeguards. In accordance with the approved KP RIISP SEP (March 2023), reporting will be conducted as follows:

Key Stakeholders for Disclosure:

- Project Management: PCMU (P&D Department) and PIUs (Line Departments).
- Regulatory/Oversight: World Bank and EPA KP.
- Local Authorities: Local Government Department (LGERDD), District Administrations, and Village/Neighborhood Councils (VC/NCs).
- Communities: Project Affected Parties (PAPs), Vulnerable Groups, and Residents.
- Civil Society: NGOs, CSOs, and Academia.

Reporting Mechanisms & Frequency:

- Monthly: Summaries of public grievances, inquiries, and incidents will be collated and reported to senior project management.
- Bi-Annual: Comprehensive progress reports on SEP implementation and environmental/social performance will be shared with the PCMU and the World Bank.
- Six-Monthly (Feedback Loop): Information on public engagement activities and project updates will be conveyed to community stakeholders through infographics, the project website, and digital messaging (e.g., WhatsApp).
- Public Consultation Records: Detailed records of all consultations (FGDs, consultations) must be maintained, transcribed, and included in the periodic reports.

5.10.4. Emergency and Contingency Reporting

In addition to regular ESMP monitoring and reporting, additional reports must be prepared by the contractor's Environmental Engineer and submitted to PIU/PCMU in the event of emergencies. An Incident Report Form is attached at Annexure-12. These may include, but are not limited to, the following:

- Immediate notification of:
 - Hazardous material spills
 - Significant ecological damage
 - Social unrest
- Submit a detailed incident report within 24–48 hours

Annex 1. Land Coordinates of the Proposed Site

Site	Area	Coordinates
Tehsil Complex Kalaya, Orakzai	4 Kanal	E3466897.686 N9896644.981
		E3466813.529 N9896715.784
		E3466668.677 N9896543.613
		E3466752.866 N9896472.784

Site	Area	Coordinates
Residential Complex Kalaya, Orakzai	2 Kanal	E3466686.128 N9896711.885
		E3466621.085 N9896766.606
		E3466662.931 N9896816.344
		E3466727.974 N9896761.622

Site	Area	Coordinates
Bachelor' suites Kalaya, Orakzai	2 Kanal	E3466695.241 N9896606.204
		E3466660.799 N9896635.180
		E3466763.806 N9896757.613
		E3466798.222 N9896728.653

Annex 2. Environmental and Social Screening Form

Khyber Pakhtunkhwa Rural Investment and Institutional

Support Project

Environmental and Social Screening Checklist

For

Tehsil Complex Kalaya, District Orakzai

October, 2025

This Checklist accompanies the annexes, including the Screening Form, the land coordinates of the complex site, the location map of the complex site, and pictures of the site.

The list of annexes contains the following:

1. Screening Form
2. Location Map of the Tehsil Complex site
3. Land Coordinates of the Tehsil Complex site
4. Master Plan of the proposed Tehsil Complex
5. Stakeholder Consultation

Screening Form

Subproject: Tehsil Complex, Kalaya, District Orakzai
 Project Implementation Unit (PIU): Communication & Works Department (C&W)
 Consulting Firm: Meinhardt International Pakistan



Name of the person who conducted the screening: Hameed Hasan,
 Position of the person who conducted the screening: Senior Environmental Specialist,
 Meinhardt International Pakistan
 Date of screening: October 13, 2025.

The E&S Screening procedure comprises two stages: (1) Initial screening by using the **Exclusion List** in Table 5 of the ESMF; and (2) Screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of the screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits.

1. Subproject Information:

Subproject Title	Tehsil Complex Kalaya, District Orakzai
Subproject Location	The proposed subproject, Tehsil complex Kalaya, District Orakzai, is located along the "Lower to Upper Orakzai Road," which provides direct access to the compound where the existing Government Colony is situated. The proposed subproject site is approximately 1 kilometer from Kalaya Bazaar. The Government compound's site, Tehsil Kalaya, has been owned by the respective District Government for approximately 52 years.
PIU in Charge	Communications & Works (C&W).
Estimated Cost	Not known at this time. Will be available in the detailed design report.
Start/Completion Date	Not known at this time.
Brief Description of Subproject	The proposed new Tehsil Complexes will be built on a total area of 10 kanals of land within the existing Government compound and will consist of the Tehsil administration Offices, residential apartments, and Bachelor employees' suites. The proposed new Tehsil Office building is a multistoried, ground+2-storied building that provides Offices with allied facilities for the Tehsil Administration staff and visiting general public. The proposed new building will include Offices, public waiting areas (for both male and female visitors), public washrooms (for both males and females), a bank counter, a kitchen on each floor, and circulation areas for easy access and circulation of officials and the public. In addition to the new office facilities, the proposed complex will include accommodation facilities for Tehsil Administration staff. The residential facilities will include a 2-bedroom apartment building with ground +2 storied, and separate bachelor's suites for employees not accompanied by their respective families. Also, around the multistoried buildings block and along the access road, green areas with plantations will be developed to increase the plantations and aesthetics of the proposed complex.

2. Environmental and Social Screening Questionnaires

Questions	Answer		Remarks
	Yes	No	
ESS1: Assessment and Management of Environmental and Social Risks and Impacts			
1. Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria?		No	The proposed subproject will have moderate environmental impacts, which can be easily mitigated on-site by adopting proper protective measures.
Questions 2 and 3 below are examples. These two are critical questions in the Screening Form, as they will determine whether a sub-project can use pre-prepared ESCOPs (Environmental and social commitment plans) or needs to prepare a site-specific ESMP. If all the sub-projects are expected to be low risk, then all sub-projects may be able to use the pre-prepared ESCOPs. However, if there are some sub-project activities, such as construction of community bridges, which may propose moderate risk, these may require site-specific ESMPs to be prepared. Think of the sub-project activities in your project and separate those that may be low risk and those that may be moderate risk.	Yes		
2. Does the subproject involve <u>new construction or significant expansion</u> of ponds, solid waste management systems, shelters, roads (including access roads with ramps, elevators and tactile paths to accommodate persons with disabilities and the elderly), community centers, schools, bridges and jetties?			The proposed subproject involves the construction of a new office building and residential facilities for the Kalaya Tehsil Administration, District Orakazi. The subproject will also involve the demolition of a few old quarters to make available the required space for the new proposed buildings.
3. Does the subproject involve the <u>renovation or rehabilitation</u> of any small-scale infrastructure, such as groundwater wells, latrines, showers/washing facilities, or shelters?		No	The proposed subproject will involve the construction of new office buildings and residential facilities with all the basic and allied facilities for the offices and residences.
4. Will construction or renovation works require new borrow pits or quarries to be opened?		No	No new borrow pits or quarries will be required for the construction materials, such as sand and aggregate, needed for the project. The construction material, such as sand and crushed stone for the construction, will be brought from the Government-licensed borrow pits at a distance of 2 km and 5 km, respectively, from the subproject site.
5. Does the project lead to any risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. ¹		No	The site for the subproject is already within a government compound and will not lead to any risks or negative impacts on individual groups or communities.
ESS2: Labor and Working Conditions			
6. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?		No	The construction works will be contracted out to approved Government contractors through an open bidding process. Government-approved contractors are those that fully abide by the existing labor laws of the country that prohibit child and forced labor. The National Identity Cards (CNICs) will be ensured with the laborers at

¹ "Disadvantaged or vulnerable" refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or ethnic peoples status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits.

			the time of hiring and kept as a record for monitoring.
7. Does the subproject involve recruitment of a workforce including direct, contracted, primary supply, and/or community workers?	Yes		All the non-skilled labor will preferably be hired locally (The contractor will be guided); however, if skilled labor is not available, it can be engaged from other areas. This will be further elaborated in the LMP. That would be part of ESMP. Both Contractor and SC will monitor the compliance.
8. Will the workers be exposed to workplace hazards that need to be managed in accordance with local regulations and EHSs? Do workers need PPE relative to the potential risks and hazards associated with their work?	Yes		There are chances that the workers during construction and demolition activities are exposed to workplace hazards like dust, loud noise, and other hazards. These will be managed according to GOKP labor regulations and WB EHSs, and the contractor will provide the necessary PPE to the workers. All mandatory OHS requirements will be ensured.
9. Is there a risk that women may be underpaid when compared to men when working on project construction?		No	Generally, in Khyber Pakhtunkhwa and particularly in the merged districts, no female workers are involved in the construction activities, so underpayment to female workers will be irrelevant.
ESS3: Resource Efficiency and Pollution Prevention and Management			
10. Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?	Yes		The new construction will generate construction waste, solid, and liquid waste, which will be handled and safely disposed of regularly from the site. The construction waste will be disposed of at an available depression site approximately 3 km from the subproject site, which is suitable for this purpose. The solid waste from the labor camp and the site will be disposed of at the existing municipal solid waste dumping site at Khada. The process of handling and safely disposing of both liquid and solid waste should be strictly monitored by the construction supervision consultants and the implementation agency to ensure it does not adversely impact the surrounding environment and the nearby communities.
11. Whether the subproject construction will use any community resources (water, sand, and gravel) and whether there is a risk of depleting these resources.	Yes		On the subproject site, the water requirement for construction activities will be met through a temporary arrangement from the nearby existing surface water source, the nearby Kalaya Khawar (approx. 500 meters from the site, a perennial River, having water throughout the year, therefore no chances of depletion of the source with this temporary use for a limited time). Sand and gravel will be procured from existing licensed borrow pits in the area at a distance of 2 km and 3 km, respectively, from the subproject site. The subproject will engage with the local people before taking the material from those sites. If necessary, prior approval from the community will be taken as well. These resources are sufficient to meet construction needs without depleting community supplies. This will be strictly monitored during construction and will consult local communities in this regard. Stakeholder engagement will be maintained throughout to prevent resource-related issues with the local community. A Grievance Redress

			Mechanism (GRM) will be available for any concerns and will be outlined in the proposed project's Environmental and Social Management Plan (ESMP).
12. Do any of the construction works involve the removal of asbestos or other hazardous materials?	Yes		The proposed complex will be built on a selected plot site and is located within the Government premises. There are likely chances of old water supply and sewage pipelines having Asbestos mixed pipes. On the site, for very old buildings, the drawings record showing the water supply and sewage pipes is not available to determine the existence and location of such pipes at the site. However, during the construction, once such pipes are found, these will be carefully removed, properly stored, and safely disposed of to avoid any risks to workers and surrounding communities. The proposed ESMP of the project will provide the detailed required mitigation and protective measures. The services of the trained technical personnel will be hired for the safe management of Asbestos pipes. The budget of ESMP will include the required cost for the safe management of Asbestos, if it is present at the site.
13. Are works likely to cause significant negative impacts to air and / or water quality?	Yes		During the construction of buildings, chances is a moderate level of negative impact on the ambient air quality and underground water quality of the site and its immediate surrounding areas. Before the start of construction, ambient air quality and underground water tests will be conducted to establish the baseline. In the proposed ESMP, a set of protective and mitigation measures, for example, to avoid dust particulate matter entry in the air, regular water spraying of the area will be suggested. Later, at regular intervals, these tests will be performed to monitor the quality of the ambient air and water and to monitor the implementation of the ESMP. During the pre-construction stage, an awareness campaign will be conducted with residents to inform them about potential risks, the proposed measures, and complaint registration provisions in the proposed GRM. This aims to promote understanding and prevent such risks. In case of violation of the agreed mitigation, how and where to report it.
14. Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?		No	The present buildings in the premises have septic tank arrangements for wastewater discharge. However, the available infrastructure has very limited capacity and will not be able to take the load of the proposed buildings. Therefore, for the proposed complex buildings, a new separate system of septic tanks with soakage pits will be constructed to accommodate the future sewage flow and safe disposal of the treated wastewater.
15. Is there any potential to have an impact on soil or water bodies due to agro-chemicals (e.g., pesticides) used in farmlands due to the consequences of the subproject activities (e.g., development of irrigation system, agriculture-related activities, seed and fertilizer assistance, procurement of pesticides)?		No	No agrochemicals like pesticides will be used during the construction process. However, at the foundation level, "Anti-termite" spray will be used to protect the building components from termites in the future. The quantity, handling, and method of spraying will be strictly monitored at the site to avoid any negative impact on the

			soil and water. In addition, before the use of Anti-termite spray, the surrounding community will be informed, and safety signage will be displayed, and the specific area will be restricted to protect the potential health risks.
ESS4: Community Health and Safety			
16. Is there a risk of increased community exposure to communicable diseases (such as COVID-19, HIV/AIDS, and Malaria), or an increase in the risk of traffic-related accidents?		No	The risk of increased community exposure to communicable diseases (including COVID-19, HIV/AIDS, and vector-borne diseases such as malaria) is assessed as low. Construction workers will be accommodated within a designated workers' camp located inside the subproject boundary, which will limit interaction with surrounding communities. The workforce size is limited and temporary, and no labor influx from distant locations is anticipated. Preventive measures will be outlined in the ESMP—including routine health screening, access to sanitation and potable water, waste management, vector control, awareness programs, and adherence to national public health guidelines—will further mitigate potential disease transmission risks. Regarding traffic-related risks, a site-specific Traffic Management Plan will be developed by the contractor before the start of the construction and will be submitted to PIU for approval. The broader guidelines and important protective measures for the plan will be included in the ESMP to ensure safe vehicular movement. Construction-related traffic will be limited to designated routes and specific time windows to avoid peak community traffic hours and minimize disturbance to residents.
17. Is an influx of workers, from outside the community, expected? Would workers be expected to use the health services of the community? Would they create pressure on existing community services (water, electricity, health, recreation, and others?)	Yes		During the construction process, around 10-20 construction workers will be present at the labor camp. The site of the labor camp provided in the proposed ESMP and required amenities for a safe, clean, and healthy environment will be ensured. Additional mitigation measures will be provided once the location of the camp is finalized. The mitigation measures will be provided in the ESMP and costed in the BOQs. In the case of accidents and other emergencies, they will use the existing health facility present in the area. For water supply and electricity, the contractor will be making his arrangements to provide such services to their workers.
18. Is there a risk that SEA/SH(Sexual Exploitation and Abuse, and Sexual Harassment)) may increase as a result of project works?	Yes		Despite the limited overall interaction between construction workers and the surrounding community, which will be limited due to on-site accommodation and restricted movement after work hours and controlled workforce movement, the risk of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) remain inherent in construction activities involving a temporary labor force. This risk may arise from inappropriate individual conduct, rather than from labor influx or sustained community exposure. To mitigate this risk, the project will implement the Labor Management Procedures (LMP) in

			accordance with ESS2 and the GBV/SEA/SH Mitigation Plan under ESS4. All project staff and laborers will be required to sign and comply with a GBV/SEA/SH Code of Conduct and will receive mandatory training and awareness-raising sessions. The Code of Conduct, translated into local languages with pictograms, will be publicly available at construction sites and worker camps. Labor camps will be established away from densely populated residential areas, with safe, well-lit, walking paths and gender-sensitive signage. Camp management guidelines will be implemented to ensure safety, with a Camp Manager responsible for monitoring behavior. An accessible SEA/SH sensitive grievance redress mechanism will be developed. This GRM will include specific protocols that will ensure confidential reporting channels and clear referral pathways. Awareness-raising activities will also be conducted for women in the community on GBV/SEA/SH, and women's participation in project-design consultations will be ensured. Relevant Occupational Health and Safety (OHS) and social risk mitigation measures will be incorporated into the ESMP to safeguard workers and minimize potential risks to the host community.
19. Would any public facilities, such as schools, health clinics, or places of worship be negatively affected by construction?	Yes		There is a mosque in the compound at a distance of approximately 200 meters from the proposed construction sites. Special measures will be adopted to ensure that the two compulsory prayers are not disturbed in the mosque. These can include steps ensuring the safety of residents coming for their prayers by fencing (or gating) the construction area to ensure no intrusion, installing signage warning against trespassing into the mosque, etc. In addition, measures like not using noise-producing machinery and equipment, and all loading and unloading of construction material will not be allowed during prayer timings.
20. Will the subproject require the government to retain workers to provide security to safeguard the subproject?	Yes		Some of the construction workers will be camped inside the site with the prior approval of the administration for security purposes.
21. Is the selected site exposed to land mines, unexploded ordnance, or explosive remnants of war?		No	The proposed subproject site has been in a declared Government Compound for approximately the last 52 years and is in use by the Government Officials of Tehsil Safi. Therefore, the site is not in an active conflict zone.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			
22. Will the subproject require the involuntary acquisition of new land (will the government use eminent domain powers to acquire the land)?		No	The proposed subproject site's land is owned by the District Administration and is Government Land, so no involuntary acquisition of new land will be required.
23. Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)?	Yes		At the subproject site, there are 16 old quarters in very depleted form, and they will be demolished to create the required space for the construction of the Tehsil residential building and bachelor suites of the Tehsil complex. 3 families and some of the bachelor's employees living in these old quarters will be temporarily displaced. The relocation arrangements for the temporarily

			displaced employees will be devised in consultation with the Tehsil Administrations to make arrangements for alternate residential accommodation. Also, a "Relocation Protocol" will be prepared in consultation with the Tehsil Administration, which will ensure all the requirements for the relocated officials and their families are met by the respective Tehsil Administration before their temporary relocation.
24. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?		No	As mentioned above, the temporarily displaced people are government employees; they will be physically displaced from their residential facilities, but they will remain as the Tehsil Administration employees, therefore no chance of economic displacement or their livelihood disturbance.
25. Has the site of the subproject been acquired through eminent domain in the past 5 years, in anticipation of the subproject?		No	The proposed subproject site land has been owned by the Government for approximately the last 52 years, and has been established as the official Government Compound for the Tehsil-level Government staff here.
26. Are there any associated facilities needed for the subproject (such as access roads or electricity transmission lines) that will require the involuntary acquisition of new land?		No	The existing compound already has these facilities, and therefore, the proposed subproject will use these existing services. However, some improvement and rehabilitation of existing services will be done, but no new land acquisition will be required.
27. Is private land required for the subproject activity being voluntarily donated to the project?		No	No private land acquisition is involved, as the Government owns the proposed subproject site.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
28. Does the subproject involve activities that have the potential to cause any significant loss or degradation of critical habitats ² whether directly or indirectly, or which would lead to adverse impacts on natural habitats ³ ?		No	The proposed subproject site is not situated in or near any critical or natural habitats; therefore, it would not have any adverse impact on them.
29. Will the project involve the conversion or degradation of non-critical natural habitats?		No	The proposed subproject will involve the construction of the Tehsil complex, which will include an office building and residential facilities within a defined area.
30. Will this activity require the clearance of trees, including inland natural vegetation?	Yes		There are 10 trees present on the proposed site of the Tehsil Complex. These existing trees have Chinaberry or Bakayan (<i>Melia azedarach</i>), Chinar (<i>Platanus orientalis</i>), and Kikar (<i>Acacia</i>) species. These 10 existing trees will be cut down to create space for the new construction of facilities. The number of trees to be cut down will be replaced with 7 or 10 trees per tree with the same species, as agreed with the World Bank or as per notification by the Government in the available open spaces around the buildings and other open spaces within the colony.

² Environmental and Social Standard 6, paragraph 23: "Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) Habitat of significant importance to endemic or restricted-range species; (c) Habitat supporting globally or nationally significant concentrations of migratory or congregatory species; (d) Highly threatened or unique ecosystems; and (e) Ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d)."

³ Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

31. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?		No	As the existing species of the trees at the site are not in the category of rare, threatened, or endangered species, therefore, no significant impact on any ecosystem will occur there.
ESS7: Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities			
32. Are there any Indigenous Peoples or Sub-Saharan African Historically Underserved Traditional Local Communities present in the subproject area and are likely to be affected by the proposed subproject negatively?		No	At the site and even in the entire central part of Khyber Pakhtunkhwa, there are no Indigenous Peoples or Communities as per ESS7.
ESS8: Cultural Heritage			
33. Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?		No	There is no historical, archaeological, or culturally significant site or facility in the vicinity of the subproject site.
34. Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves, or stones) or require excavation near there?		No	No objects have spiritual values to local communities present within or near the subproject site.
ESS10: Stakeholder Engagement and Information Disclosure			
35. Is Stakeholder Engagement Carried out, and what are the stakeholders' views about the subproject?	Yes		A stakeholder consultation was conducted, and a total of 26 participants, including 4 women, attended the consultation. A summary of the stakeholder engagement is presented below: The stakeholders highlighted that it is equally accessible to all sectors of local society, and endorsed the site's suitability, citing its security and centrality. The Female community members, of NADRA/CFC visitors and families of government staff, also supported the site, noting its accessibility, proximity to markets, and the perception of safety it offers. They raised the issue of housing shortages, pointing out that many staff members posted in Kalaya lack proper residential facilities, and recommended that staff housing be incorporated into the plan. Accessibility was widely acknowledged by the participants as a strength of the proposed site, as it is already accessible for men, women, children, the elderly, and persons with disabilities. Stakeholders emphasized the importance of gender-sensitive facilities in the new complex. Female participants and district administration representatives strongly recommended the inclusion of separate waiting areas and washrooms for women, as well as a lactation room for nursing mothers. They highlighted the need for strict dust suppression measures and training of laborers in proper waste management during construction.

3. Conclusion

From the above screening checklist, it is clear that the potential environmental and social risks and impacts of the subproject are of a moderate level and for a limited construction period. These risks and impacts can easily be handled, managed, and mitigated at the local level at the site with effective and efficient regular monitoring at the site. A site-specific ESMP will be prepared to mitigate these risks.

4. Review & Approval

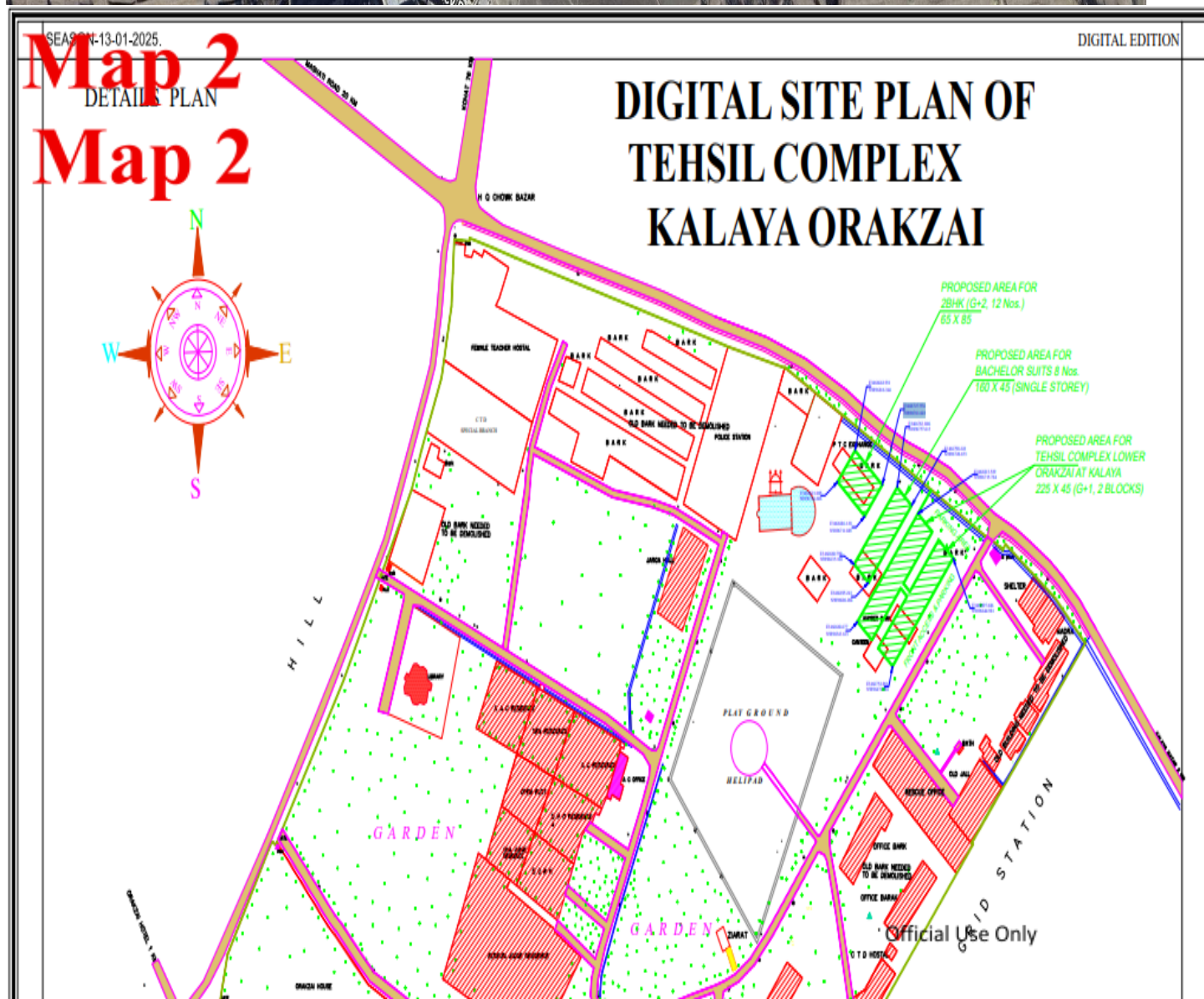
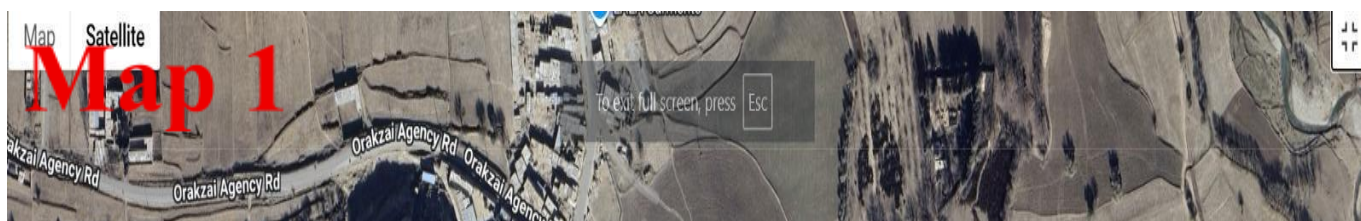
Office Nos. 401-402, Block-A, City Tower, University Road Peshawar Khyber Pukhtunkhwa, Email: mugc.kpriisp@gmail.com



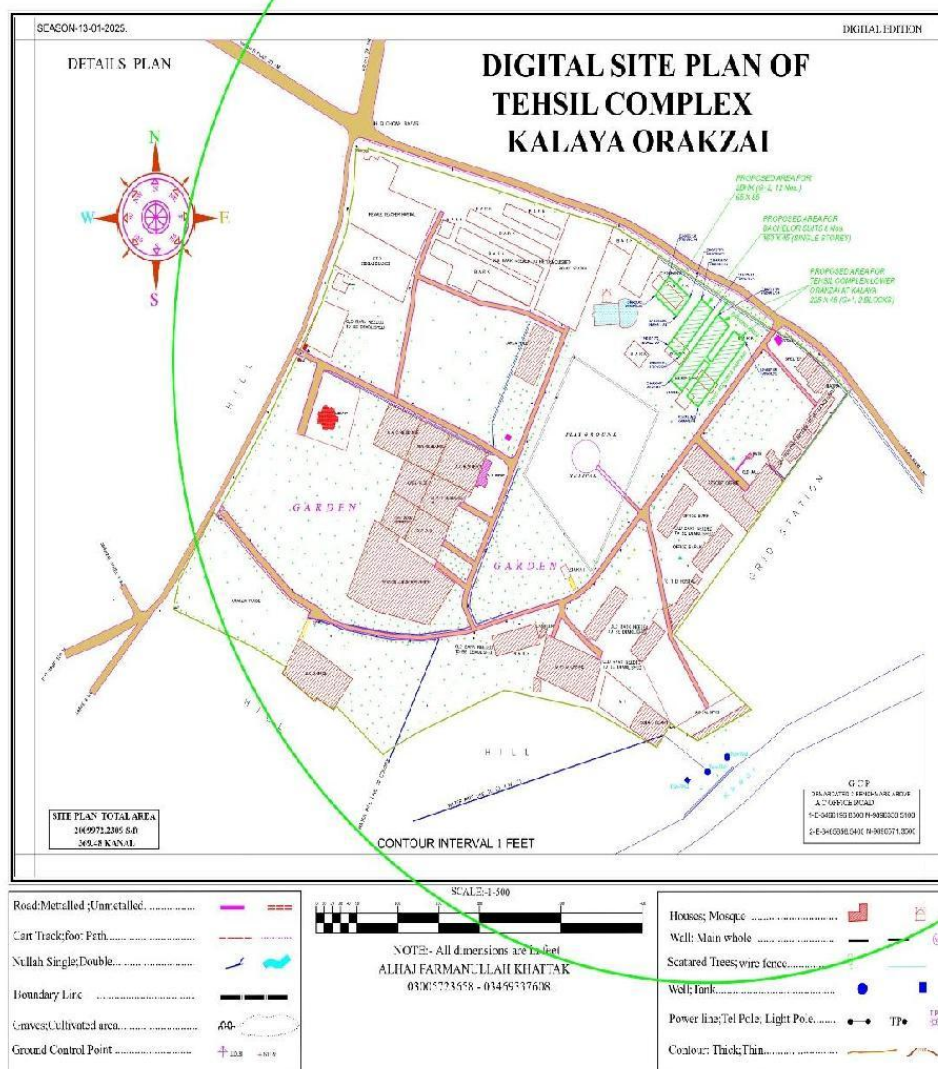
Reviewed By: Usman Shinwari
Position: Deputy Director E&S C&W
Date: 17/10/2025

Approved By: Naveed Iqbal
Position: Project Director, C&W PIU
17/10/2025

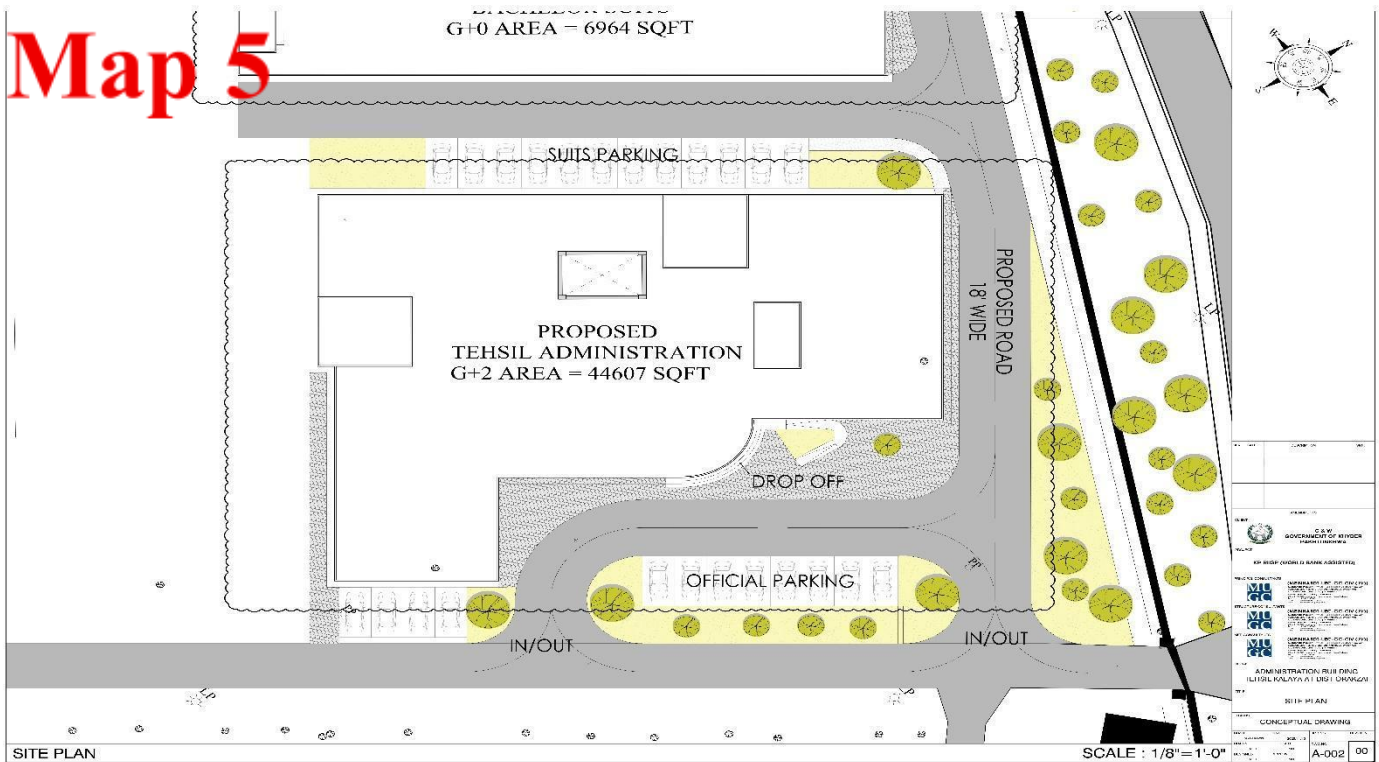
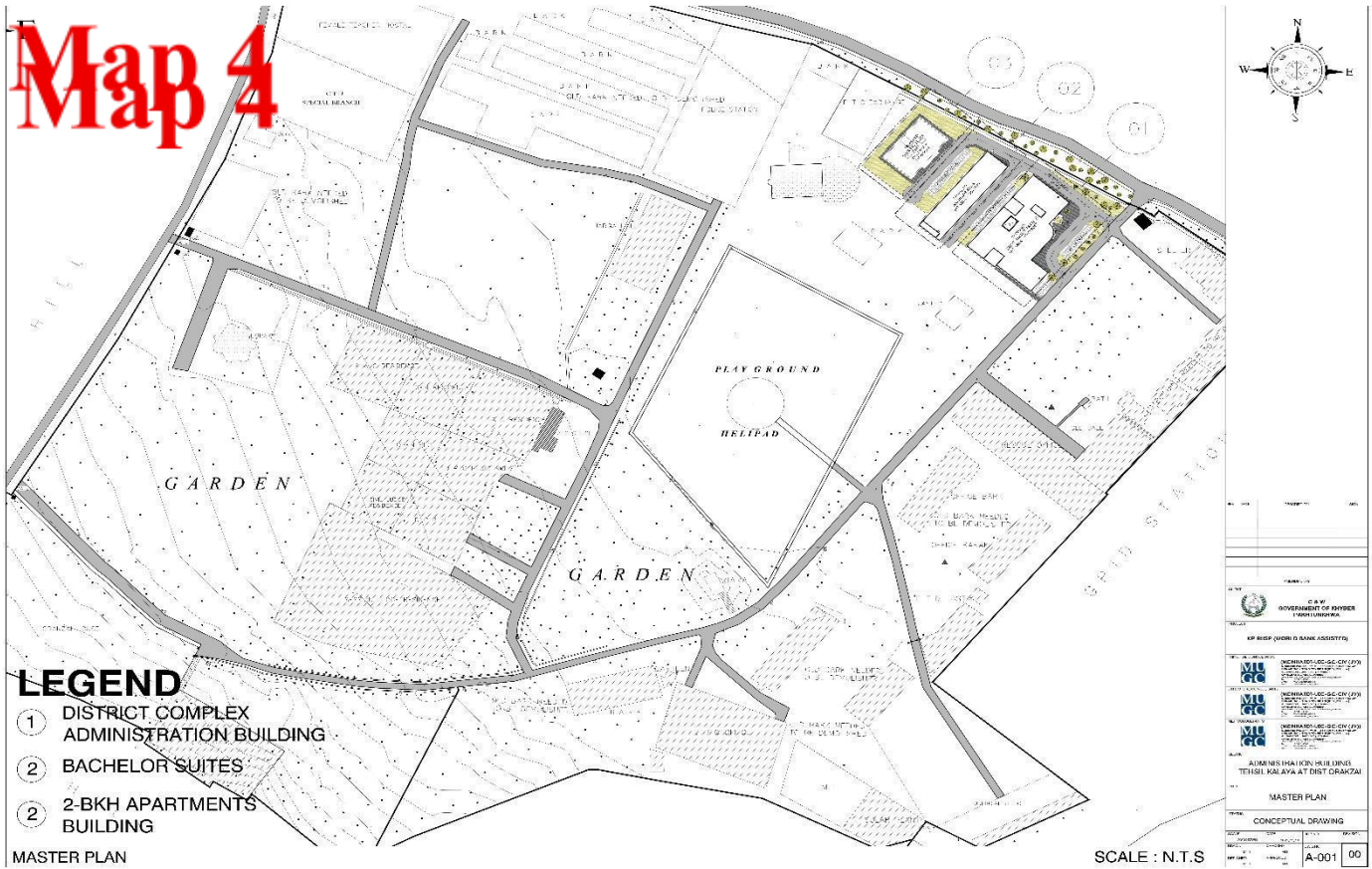
Annex 3. Maps and Architectural Drawings



Map 3



i) Tehsil Office Building Complex



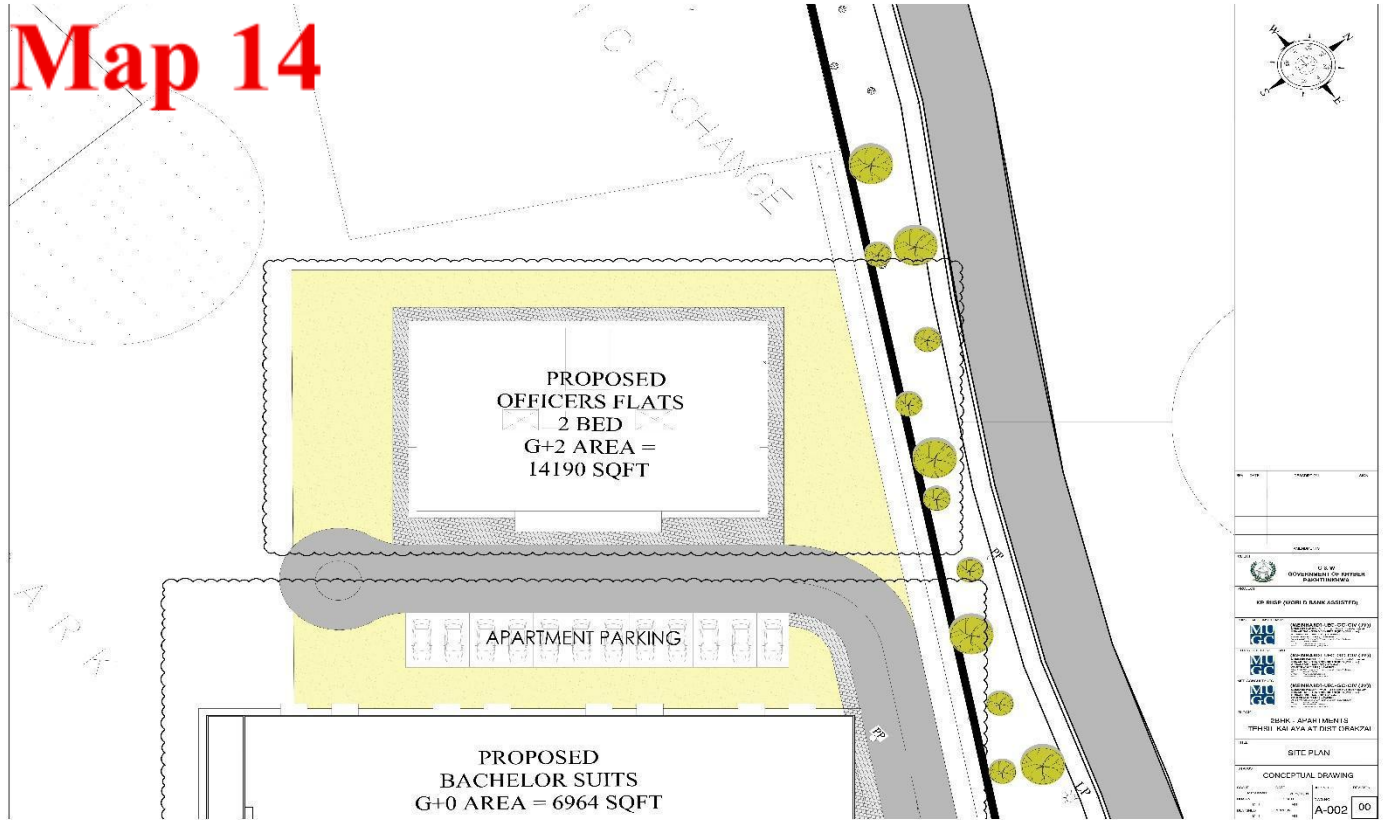
Map 6



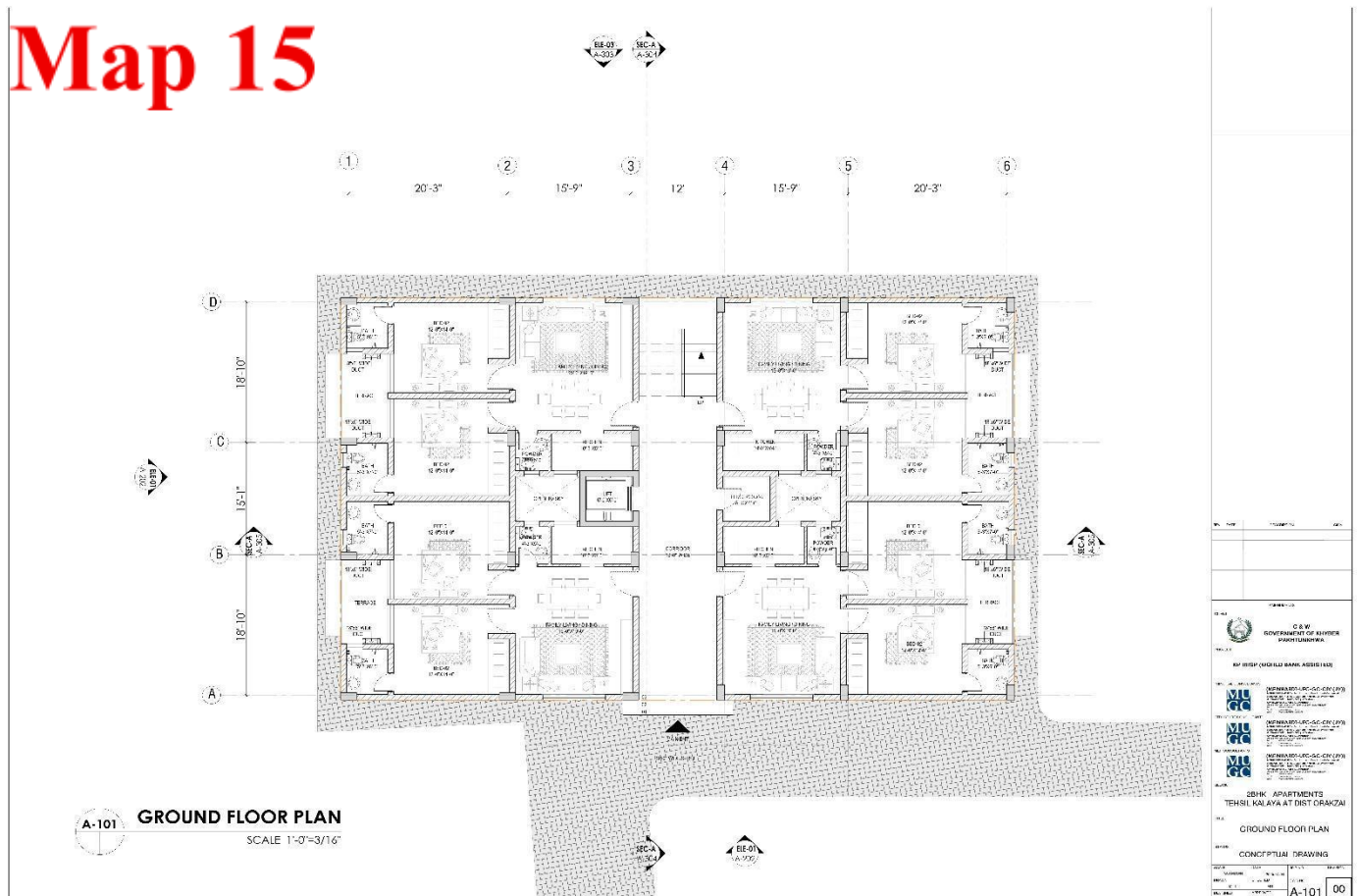
Map 7

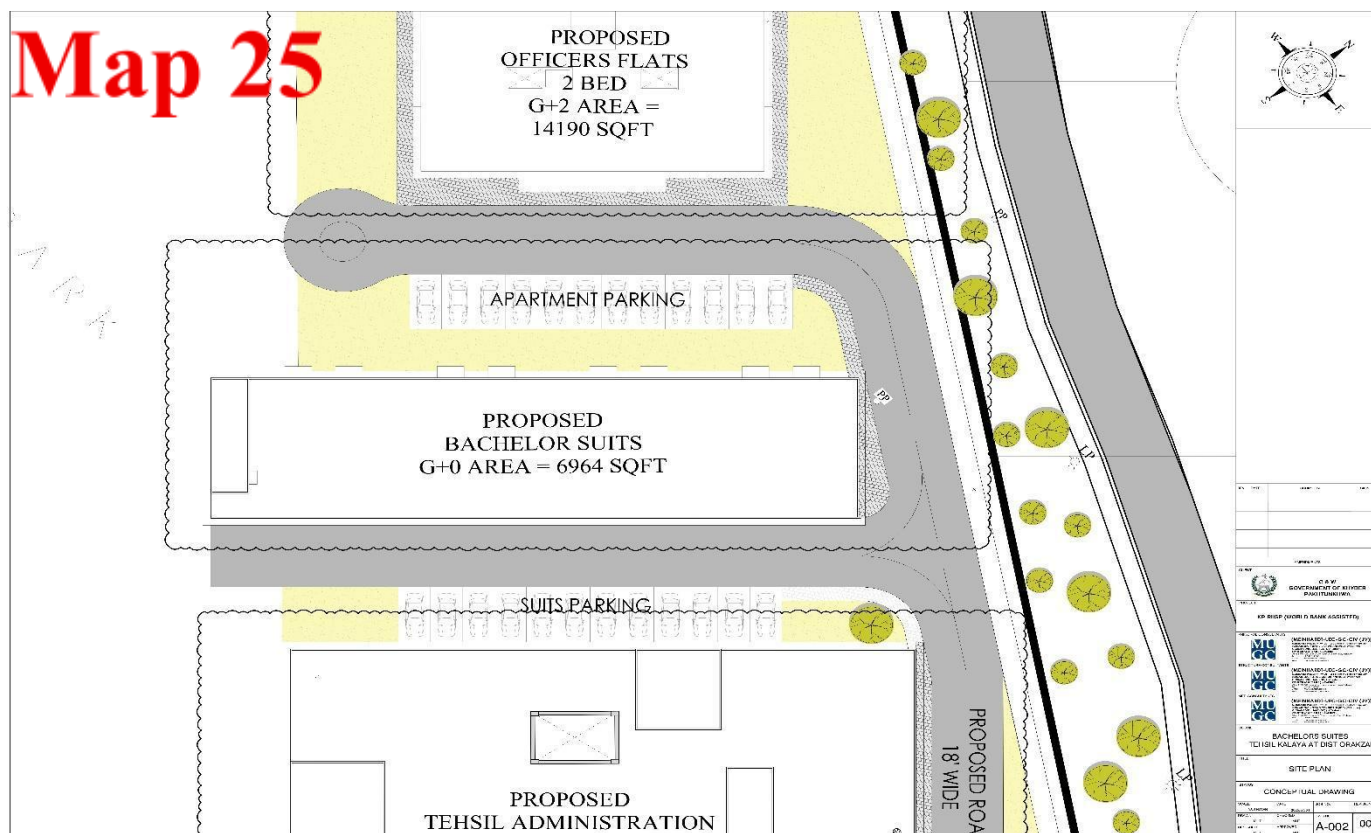
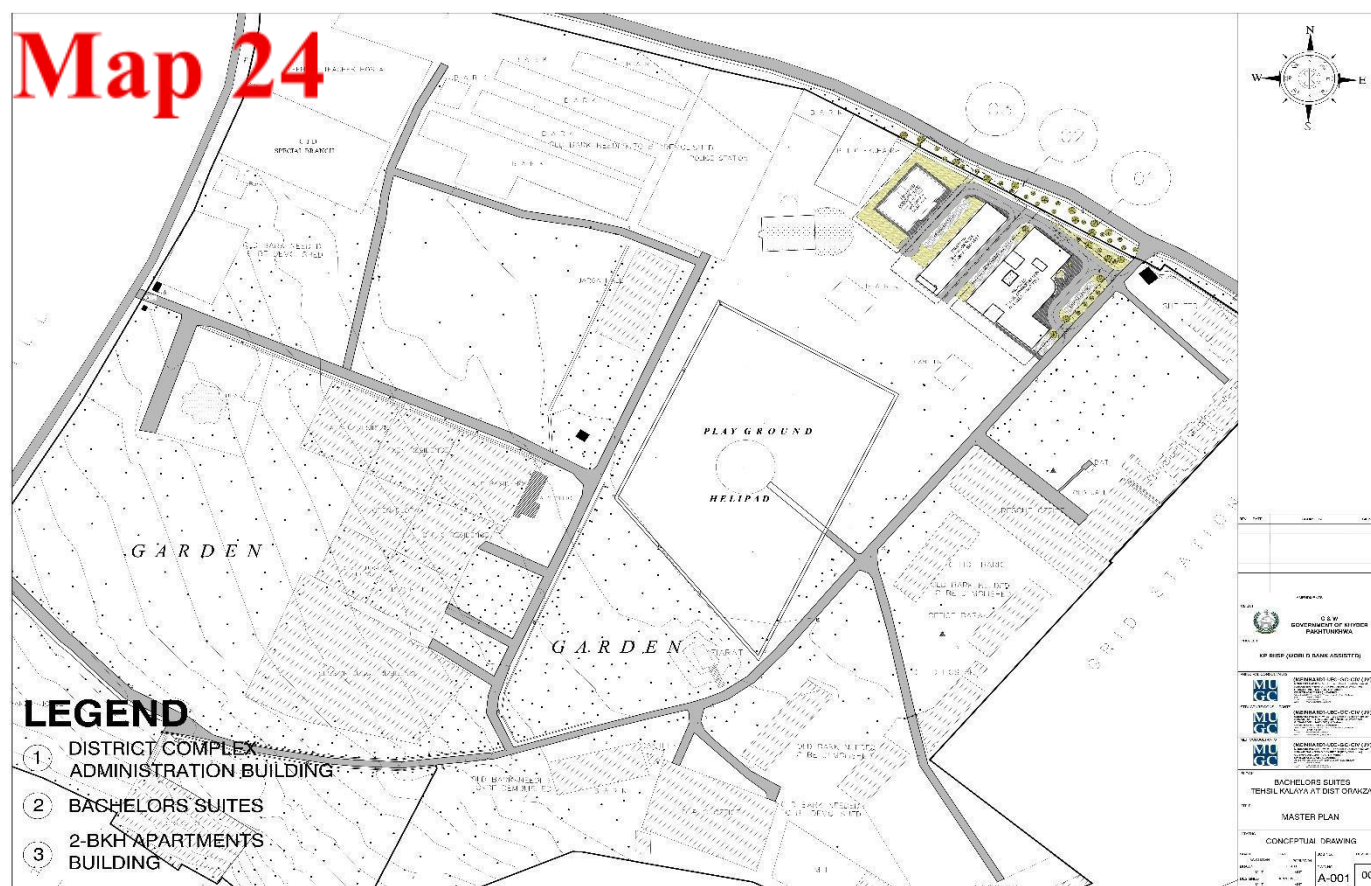


Map 14

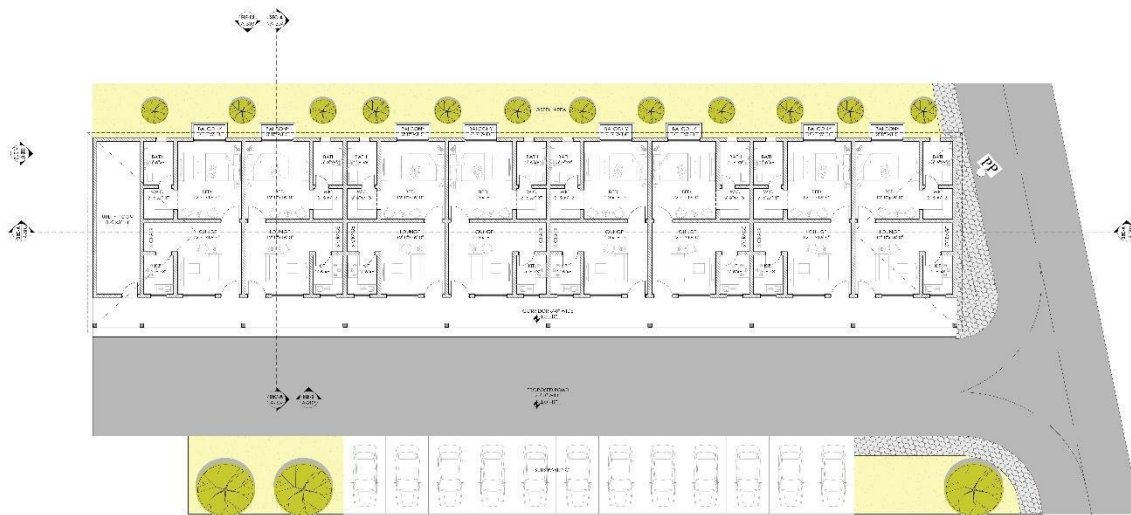


Map 15



iii) **Bachelors Suites Kalaya, Orakzai**

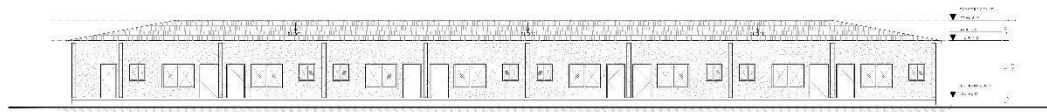
Map 26



A-101 GROUND FLOOR PLAN
SCALE 1/8"=1/8"

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4	01/01/2018	04
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Map 27



A-301 FRONT ELEVATION-01
SCALE 1/8"=1/8"

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Annex 4. EPA Environmental Assessment Rules



GOVERNMENT OF THE KHYBER PAKHTUNKHWA FORESTRY, ENVIRONMENT AND WILDLIFE DEPARTMENT

NOTIFICATION

Dated Peshawar the, 02nd September, 2021

No. SO (Envf)/FE&WD/1-29/2021/Vol-II. In exercise of the powers conferred by section 31 of the Khyber Pakhtunkhwa Environmental Protection Act, 2014 (Act No. XXXVIII of 2014) read with section 13 thereof, the Government of Khyber Pakhtunkhwa is pleased to make the following rules, namely:

THE KHYBER PAKHTUNKHWA ENVIRONMENTAL ASSESSMENT RULES, 2021.

1. Short title and commencement.---(1) These rules shall be called the Khyber Pakhtunkhwa Environmental Assessment Rules, 2021.

(2) They shall come into force at once.

2. Definitions.---- (1) In these rules, unless there is anything repugnant in the subject or context;

- (a) **“Act”** means the Khyber Pakhtunkhwa Environmental Protection Act, 2014 (Khyber Pakhtunkhwa Act No. XXXVIII of 2014);
- (b) **“Director-General”** means the Director-General of the Khyber Pakhtunkhwa Environmental Protection Agency;
- (c) **“Environmental Assessment Advisory Committee”** means the Committee constituted under rule 23 of these rules;
- (d) **“EIA”** means an Environmental Impact Assessment as defined in clause (s) of section 2 of the Act;
- (e) **“GEA”** means as General Environmental Approval to be submitted with the Agency by proponent, which are not covered by Environmental Impact Assessment or Initial Environmental Examination;
- (f) **“GIS”** means Geographic Information System;
- (g) **“GPS”** means Global Positioning System;
- (h) **“IEE”** means an Initial Environmental Examination as defined in clause (ff) of section 2 of the Act; and
- (i) **“Schedule”** means a Schedule appended to these rules.

(2) Words and expressions used in these rules but not defined shall have the same meanings as are assigned to them in the Act.

3. Application for screening and scoping of project.--- The proponent shall file an application with the Agency, having project description or activities on attached proforma as specified in **Schedule-I** to get clear directives for screening and scoping of the project, as per rule 4.

4. Projects requiring an EIA or IEE or GEA.---Where the project falls with the categories mentioned in **Schedules-II, III and IV**, the proponent shall file EIA or IEE or GEA respectively, with the Agency.

5. Directions for a specific project.---Where the project does not fall within the categories as mentioned in **Schedule-II, III and IV** and the Agency is of the opinion that said project may create an environmental hazard, the Agency shall direct the proponent to file an EIA, IEE or GEA, as the case may be, for reasons to be recorded in such directions:

Provided that such directions shall not be issued without the recommendations in writing of the Environmental Assessment Advisory Committee.

6. Preparation of guidelines for EIA, IEE and GEA.--- Guidelines for preparation of EIA or IEE or GEA of general and sectoral applicability may be specified by the Agency; provided that such guidelines may indicate specific assessment requirements for planning, construction and operation of a project relating to a particular sector.

7. Review Fees.---The proponent shall pay, at the time of submission of an EIA or IEE or GEA, a non-refundable review fee to the specified account of the Agency, as per rates given in **Schedule-V**.

8. Filing of EIA, IEE and GEA.--- (1) The proponent shall file ten paper copies and two electronic copies of an EIA or IEE with the Agency.

(2) Every EIA or IEE shall be accompanied by--

- (a) an application, in the form set out in **Schedule-VI**, and
- (b) original receipt of the review fee slip.

(3) The process for filing the GEA shall be the same as mentioned in sub-rule (1) and (2) except one hard and electronic copy of the report shall be submitted with the Agency.

9. Preliminary scrutiny.---(1) Within ten (10) working days of filing of the EIA, IEE or GEA, the Agency shall,-

- (a) confirm that the EIA, IEE or GEA is complete for purposes of initiation of the review process and issue confirmation letter to the proponent; or
- (b) require the proponent to submit such additional information as may be specified at any stage during the review process; or

SCHEDULE-VI
(see rule 8 (2) (a))

Application Form

1	Name and Address of Proponent -----	Phone: ----- Fax: ----- Telex: -----										
2	Description of project----- -----											
3	Location of project and GPS Coordinates/GIS map:-----											
4	Objectives of Project:-----											
5	IEE/EIA/GEA attached? EIA/IEE/GEA	Yes/No										
6	Have alternative sites been considered and reported in EIA/IEE/GEA?	Yes/No										
7	Existing land use Is basic sites data (Only tick yes if the available, or has it been measured? measured?	Land Requirement										
8	Meteorology (including rainfall) Ambient air quality Ambient Water Quality Ground Water quality	<table border="0"> <tr> <td><u>Available</u></td> <td><u>Measured</u></td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> </table>	<u>Available</u>	<u>Measured</u>	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No
<u>Available</u>	<u>Measured</u>											
Yes/No	Yes/No											
Yes/No	Yes/No											
Yes/No	Yes/No											
Yes/No	Yes/No											
9	Have estimates of the following been reported Water balance Solid waste disposal Liquid waste treatment	<table border="0"> <tr> <td><u>Measured</u></td> <td><u>Reported</u></td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> <tr> <td>Yes/No</td> <td>Yes/No</td> </tr> </table>	<u>Measured</u>	<u>Reported</u>	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No		
<u>Measured</u>	<u>Reported</u>											
Yes/No	Yes/No											
Yes/No	Yes/No											
Yes/No	Yes/No											
10	Source of power	Power Requirement										
11	Labour force (number)	Construction: Operation:										

Verification: I do solemnly affirm and declare that the information given above and contained in the attached IEE/EIA/GEA is true and correct to the best of my knowledge and belief.

Date _____

Signature, name and
Designation of proponent
(with official stamp/seal)

SCHEDULE-IX
(see rule 13)

Decision on GEA

1. Name and address of proponent _____
 2. Description of project _____
 3. Location of project and GPS Coordinates/GIS map. _____
 4. Date of filing of GEA _____
 5. After careful review of the GEA, and all comments thereon, the Agency has decided
 - (a) to accord its approval, subject to the following conditions:

 or
 - (b) that the proponent should submit a GEA with the following modifications:-

 or
 - (c) that the proponent should submit an IEE of the project, for the following reasons:-

 or
 - (d) to reject the GEA report of the project, being contrary to environmental objectives, for the following reasons:

- [Delete (a)/(b)/(c)/(d), whichever is inapplicable]
- Dated _____ Tracking no. _____

Director-General Agency (with official stamp/seal)

SO (Envt)/FE&WD/1-29/2021/Vol-II/

Dated 02-09-2021

Copy forwarded to the:

1. Principle Secretary to Governor, Khyber Pakhtunkhwa.
2. Principle Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. All Administrative Secretaries, Khyber Pakhtunkhwa.
4. Accountant General, Khyber Pakhtunkhwa.
5. All Commissioners, Khyber Pakhtunkhwa.
6. All Heads of Attached Department, Khyber Pakhtunkhwa.
7. Chairman Environmental Protection Tribunal, Peshawar.
8. All Deputy Commissioners, Khyber Pakhtunkhwa.
9. Registrar, Peshawar High Court, Peshawar.
10. PSO to Chief Secretary, Khyber Pakhtunkhwa.
11. PSO to Chief Minister, Khyber Pakhtunkhwa.
12. Director General, Environmental Protection Agency, Khyber Pakhtunkhwa, Peshawar **with the request to depute a representative to collect 100 gazatted copies of the Notification from Government Printing Press.**
13. Director Information, Khyber Pakhtunkhwa.
14. Chief Executive Officer, WSSP, Peshawar.
15. Manager, Government Printing Press for publication in next official gazette. **He is requested to provide 100 Gazatted copies of the same for information and record.**
16. Section Officer (Cabinet), w/r to his letter No. SOC(E&AD)/13-3/through circulation/21 dated 01-09-2021
17. PS to Secretary Forestry, Environment and Wildlife Department, Khyber Pakhtunkhwa.
18. Master file.

(Muhammad Qasim)
Section Officer (Environment)

Annex 5. Water Quality, Ambient Air, Test Reports

Air Quality Analysis, Kalaya, District Orakzai on February 15, 2026

S No.	Parameters	NEQs	Result
1	PM _{2.5}	35 µg/m ³	57 12.91 µg/m ³
2	PM ₁₀	150 µg/m ³	26 29.7 µg/m ³
3	NO ₂	80µg/m ³	1 1 µg/m ³
4	O ₃	130 µg/m ³	43 95.07 µg/m ³
5	SO ₂	120 µg/m ³	1 1.7 µg/m ³
6	CO	130 µg/m ³	1 140 µg/m ³

Source: <https://weather.com/en-PK/forecast/air-quality>



GOVERNMENT OF KHYBER PAKHTUNKHWA
Public Health Engineering Department
Central Water-Quality Laboratory Peshawar
Plot # 40, Sector B-2, Phase-5, Hayatabad, Peshawar
Ph: 091 9217788, Mob: 03339656580 e-mail: srophed@gmail.com



No: 25/PWR		Techno Consultants International				
WATER QUALITY ANALYSIS REPORT						
Source Name/ID	DWSS Kalaya IIQ		Sampling Date & Time	2-Sep-25 , 0:00		
Source/Sampling point	Source		Sample receipt Date & Time	2-Sep-25 , 0:00		
District / Address	District Orakzai		Temperature (during test)	25 C		
Collected by/Received From	KP-RHSP CI		Date of Analysis	2/Sep/25		
Ay Complaint by Client	Q/Analysis		Reporting Date	4/Sep/25		
Desired Tests	PC + TSS + Arsenic + Microbial All Parameters		Ref /Contact #	0		
PHYSICAL AND AESTHETIC PARAMETERS						
S.#	Water Quality Parameters	Unit	Detectable Limit	Reference method	Permissible limits	Analysis Results
1	Color	-	-	Sensory evaluation	Clear/Colorless	Clear
2	Odor	-	-	Sensory evaluation	Unobjectionable (U.O)	U.O
3	Taste	-	-	Sensory evaluation	Unobjectionable (U.O)	U.O
4	pH	-	0.02	APHA, 20th Edition	6.5-8.5 (WHO 2004)	7
5	E.C	µS/cm	0.2875	APHA, 20th Edition	NGVS	435
6	Turbidity	FNU	0.05	APHA, 20th Edition	5 (WHO 2004)	3.23
7	TSS					6.46
MAJOR CHEMICAL PARAMETERS						
8	TDS	mg/L	-	APHA, 20th Edition	1000 (WHO, 2004)	261.0
9	Hardness	mg/L	5	APHA, 20th Edition	500 (WHO, 2004)	203.6
10	Calcium	mg/L	2	APHA, 20th Edition	200 (WHO, 2004)	38.6
11	Magnesium	mg/L	1	APHA, 20th Edition	150 (WHO, 2004)	26.0
12	Alkalinity	mg/L	-	APHA, 20th Edition	NGVS	164.4
13	Carbonate	mg/L	5	APHA, 20th Edition	NGVS	0.0
14	Bicarbonate	mg/L	5	APHA, 20th Edition	NGVS	164.4
15	Chloride	mg/L	2	APHA, 20th Edition	250 (WHO, 2004)	64.4
17	Sodium	mg/L	1	APHA, 20th Edition	200 (WHO, 2004)	16.5
18	Sulphate	mg/L	1	APHA, 20th Edition	500 (WHO, 2004)	13
19	Nitrate	mg/L	0.01	APHA, 20th Edition	50 (WHO, 2004)	0.0
20	Potassium	mg/L	0.01	APHA, 20th Edition	NGVS	0.4
22	Arsenic	mg/L	0.001	APHA, 20th Edition	0.05 (PSQCA, 2004)	0.005
MICROBIOLOGICAL PARAMETERS						
1	Total Coliform	1 CFU / 1 ml		Petrifilm	0 CFU / 1 ml	3
2	Fecal Coliform	1 CFU / 1 ml		Petrifilm	0 CFU / 1 ml	0
3	Total Coliform	+Ve/-Ve		KIT-Method	-Ve	+Ve

Abbreviations:

NGVS: No Guideline Value S WHO: World Health Organization
+Ve/-Ve: Positive/Negative NT: Not Tested
E.C: Electrical Conductivity FNU: Formazin Nephelometric Units
TDS: Total Dissolved Solids BDL: Below Detection Level

P: Physical, C: Chemical, M: Micro
µg/L: micro-gram per Liter
µS/cm: microsiemens / cm

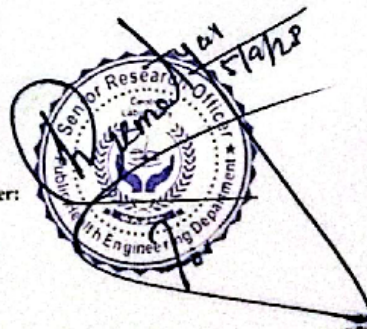
Terms and Conditions

- The results of the laboratory analysis by PHED are verified as accurate and authentic only for the parameters tested.
- Analysis report is not valid for court use or business purpose.
- In case of any dispute in connection with authenticity of the report, the laboratory record of the analysis will be considered final.
- PHED does not accept any responsibility regarding accuracy of sample collection procedures if collected by the client.
- PHED will not be responsible for loss or damage to the samples in its possession for reasons beyond its control.
- PHED reserves the right to accept or reject samples for analysis without assigning any reason.

Remarks:

Microbial Contamination detected.

Senior/
Research Officer:



Annex 6. Participants' List of Stakeholders' Consultation

Attendance List

Meeting / Visit: Stakeholders' Consultation

Venue: Tehsil Complex Kalaya Orakzai

Date: 22/9/25

Zakir Hussain AAC (R) In chair

S No.	Name	Designation/Department	Contact /Email	Signature
1	Shahid Mehmood	BM / The Bank of Khyber	0333-9978377 hms171@bok.com	
2	Kumail Nasser	BDM / Bank of Khyber	03089261359	
3	Tabiat AS	Petition writer Hco	0306-928682	
4	Naimat Khan	Deputy Amir	03339665324	
5	Najma	Community at c/c		
6	Shahreen	Community at c/c		
7	Nasreen	Community at c/c		
8	Hazrat	Staff of District Administration	03339390128	
9	M. Ali Haid	S.D.Fo Forest	03339617914	
10	Ishtiaq R.	Deputy Ranger Wildlife	03159499676	
11	Shoaib Khan	Civil Defence	03331303088	
12	Jahangir Khan	Reserve 1122 PA to DEO	03365005854	
13	Awan Hussain	PSO / Sports / ORA	03005988506	
14	Liaqat Hussain	SDO / LG & RDP	03341996682	
15	Masroor Ahmad	TMD / LG & RDP	03139041904	
16	Shah Javed Hussain	Sub Divisional Engineer	03330958682	
17	Zakir Hussain	AAC (Revenue)		
18	Im Ali Shah			
19	Ahsan Shah	AC (L2)		
20	M. Ishaq	Supervisor LG & RDP		
21	Fazal Rabi	Narb Tehsildar		
22	Hafeez ud-Din	Tehsildar		
23	Muhammad Ali	S.D.F.O Forest		

24. Saifullah Engineer LG & RDP

25. Asif Khan Social Specialist

26. Saima Saeed Gender Specialist (Meinhardt)

Annex 7. Photos (with captions) of the Site and the Consultations



E&S Team meeting with AC Kalaya, Orakzai



E&S Team meeting with AAC & Line Departments, Kalaya



Meeting with staff of BoK located adjacent to the selected site



Consultation with local vendors situated at the proposed Tehsil complex site.



Consultation with female visitors at NADRA / CFC



Consultation with families residing at existing quarters at residential complex site

1. Site Selection & Layout

- **Proposed Location:** The labor camp will be located within the subproject site, which is situated within the existing Government compound along the Lower to Upper Orakzai Road in Kalaya, District Orakzai.
- **Reasoning:** The site is approximately 1 kilometer from Kalaya Bazaar and has been owned by the District Government for approximately 52 years. Locating the camp within the government compound ensures security and minimizes community exposure to communicable diseases.
- **Layout:** The construction area will be fenced or gated to prevent unauthorized entry and ensure public safety, particularly for residents visiting the nearby mosque. Warning signage will be installed to restrict trespassing.

2. Accommodation Standards

- **Capacity:** The camp is expected to accommodate a workforce of approximately 15 construction workers.
- **Structure & Facilities:** The camp will provide a safe, clean, and healthy environment with required amenities.
- Each sleeping room should provide at least **4 to 5.5 square meters** of floor space per occupant, with a minimum ceiling height of **2.10 meters**.

3. Water Supply & Sanitation

- **Water Supply:** The contractor will be responsible for arranging water for the workers. For construction, water will be sourced through a temporary arrangement from the nearby Kalaya Khawar, located approximately 500 meters from the site.
- **Sanitation:** The sewage system for the campsite will be properly designed (pit latrines or, as required, septic tanks with soakage pits) to receive all sanitary wastewaters before discharging to the final disposal point to ensure safe wastewater disposal.
- For the labor camp and workplace, the contractor will provide 1 toilet per 7 to 10 workers. If the labor or the working staff includes females, a separate toilet facility will be provided by the contractor at the workplace.

4. Waste Management

- **Disposal:** Solid and liquid waste should be handled and safely disposed of. The solid waste from the campsite should be safely disposed of at the existing municipal dumping site situated at Khada.
- **Hazardous Materials:** The hazardous waste, if it is found at the camp site, shall be stored in closed containers, with proper labelling of containers, including the identification and quantity of the contents, hazard contact information. It will be safely disposed of in an EPA-registered hazardous waste facility within the province.

5. Food & Nutrition

- **Kitchen:** A hygienic cooking area/mess will be established separately from sleeping quarters.
- **Fuel:** The contractor must provide LPG cylinders for cooking. Cutting local trees/bushes (e.g., Acacia, Eucalyptus) for fuel is strictly prohibited.
- **Hygiene:** Kitchen waste will be disposed of daily to maintain hygiene and prevent pests.

6. Worker Welfare & Social Facilities

- **Social Connectivity:** Workers will have access to mobile communication (network coverage is available in Safi).
- **Transport:** Vehicles will be available for emergency transport or material handling.
- **Mosque:** A prayer area will be designated within the camp, or workers may use the existing prayer facilities in the complex.

7. Health & Safety

- **Occupational Health and Safety (OHS):** The contractor shall provide the necessary means for emergency response on call 24 hours/day, like trained medical staff, First-aid and medical kits, Firefighting equipment (extinguishers, breathing apparatus, ambulance service, etc).

- Layout plan for campsite, indicating safety measures taken by the contractor, e.g., firefighting equipment, safe storage of hazardous material, first aid, security, fencing, and contingency measures in case of accidents.
- **Safety:** Facilities must have fire safety plans, including wardens, periodic drills, and maintained equipment.
- **Medical Facilities:** Workers will use the existing health facilities present in the area in case of accidents or emergencies.
- **Disease Prevention:** The communicable disease of most concern, such as sexually-transmitted diseases (STDs), HIV/AIDS, should be prevented by successful initiatives, typically involving health awareness, education initiatives, training of workers in disease treatment, immunization programs, regular medical checkups of labor and staff, and providing health services.
- Reducing the impacts of vector-borne diseases should be accomplished through the implementation of diverse interventions, which include prevention of larval and adult propagation of vectors through sanitary improvements and elimination of breeding habitats close to human settlements, and by eliminating any unusable impounding of waste.

8. Security

- **Access Control:** Construction workers will be camped inside the site for security purposes, subject to prior approval from the administration.
- **Site Safety:** The construction area will be fenced/gated, and safety signage will be displayed to protect the general public.

9. Communication & Transport

- **Traffic Management:** A site-specific Traffic Management Plan will be implemented to ensure safe vehicular movement on the Lower to Upper Orakzai Road.
- **Restrictions:** Construction-related traffic will be restricted to designated routes and specific time windows to avoid peak community hours. Loading and unloading of material will not be allowed during prayer timings at the nearby mosque.

10. Labor Rights & Compliance

- **Hiring Practices:** Non-skilled labor will preferably be hired locally, while skilled labor may be engaged from other areas if unavailable locally.
- **Prohibitions:** Forced labor and child labor are strictly prohibited; all laborers must possess National Identity Cards (CNICs) at the time of hiring.
- **Gender:** No female workers are expected to be involved in construction activities.
- **Code of Conduct:** All workers and contractors must sign a GBV/SEA/SH Code of Conduct to prevent sexual exploitation and harassment.

11. Grievance Redress Mechanism (GRM)

- **Availability:** A Grievance Redress Mechanism (GRM) will be available for community members and workers to register concerns.
- **Awareness:** Pre-construction campaigns will inform residents about potential risks and how to report violations.

12. Monitoring & Reporting

- **Oversight:** The Communication & Works (C&W) Department and Construction Supervision Consultants (SC) will strictly monitor the implementation of labor and environmental standards.
- **Inspections:** Regular monitoring will ensure compliance with the Environmental and Social Management Plan (ESMP), including waste disposal and the handling of anti-termite sprays.

Annex 9: Components of Site Specific OH&S Plan

1. Risk Assessment & Planning

- **Hazard Identification:**

- Demolition Risks: The project involves the demolition of 16 old quarters within the existing compound. This presents significant risks of falling debris, structural collapse, and dust inhalation.
- Asbestos Exposure: There is a potential presence of asbestos-mixed pipes in the 16 old structures. Improper handling during demolition could release hazardous fibers into the air.
- Traffic Hazards: The site is located along the Lower to Upper Orakzai Road. The movement of heavy machinery and material transport vehicles poses collision risks to pedestrians and local traffic.
- Proximity to Community Facilities: The presence of a mosque and a NADRA office nearby increase the risk of accidents involving the general public, especially during peak hours and prayer times.
- Excavation & Soil Stability: Earthwork for foundations and the installation of a new, separate septic tank and soakage pit system pose risks of cave-ins or falls into open trenches.
- Climate Hazards: Workers are subject to extreme seasonal temperatures in District Orakzai, which can lead to heat exhaustion or cold-related illnesses.

- **Planning:**

- Demolition Strategy: A systematic, top-down demolition approach will be followed. Approved demolition plan, utility isolation, barricading, and dust suppression. The work zone will be strictly cordoned off with safety tape and physical barriers.
- Asbestos Management: Before general demolition begins, any asbestos-containing materials will be identified, wetted to suppress fibers, and removed by trained technical personnel using specialized equipment.
- Fire prevention plan, controlled storage of flammables, hot-work permits, provision and location of firefighting equipment.
- A proper traffic management plan will be prepared in consultation with the PIU staff and implemented to avoid traffic jams/public inconvenience.

2. Clear Roles & Responsibilities

- Contractor's Site Environmental Engineer (CEE): Responsible for the daily implementation of this OH&S plan, conducting safety inspections, and ensuring all workers wear the required PPE.
- Site Supervisor: Will oversee high-risk activities such as demolition and excavation, ensuring that safety protocols are strictly followed.
- Supervision Consultant (SC) / PIU C&W: Will conduct regular audits and inspections to verify compliance with E&S safeguards and OH&S standards.

3. Training & Awareness

- Induction Training: Every worker will receive a safety induction before starting work, with a focus on demolition safety and asbestos awareness.
- Toolbox Talks: Daily morning safety briefings will address the specific tasks of the day and remind workers of hazards related to the nearby mosque and traffic.
- Safety Signage: Instructions, Danger signs, and PPE reminders will be displayed in Urdu and Pashto at the site entrance and near high-risk areas.

4. Personal Protective Equipment (PPE)

- Standard Gear: All personnel on-site must wear high-visibility vests, hard hats, and safety boots at all times.
- Task-Specific PPE: Dust masks and safety goggles will be mandatory during demolition and excavation. If asbestos is handled, specialized respiratory protection (N95 or higher) and disposable coveralls will be provided.

5. General Safety Measures

- Public Safety: The construction area will be completely fenced or gated. Specific attention will be given to securing the area near the mosque to prevent children or worshippers from entering the site.
- Prayer Time Restrictions: No loading or unloading of construction materials will be allowed during prayer timings at the nearby mosque to minimize noise and traffic disturbance.
- Traffic Management: Flagmen will be stationed on the Lower to Upper Orakzai Road to manage the entry and exit of construction vehicles.
- Dust Suppression: Frequent water sprinkling will be carried out on unpaved site roads and during demolition to maintain air quality for workers and the neighboring community.

6. Monitoring & Reporting

- Daily Inspections: The Site Supervisor will verify PPE compliance and ensure that all open excavations are properly barricaded.
- Incident Reporting: All near-miss events and injuries must be recorded. Minor injuries must be reported within 24 hours, while serious accidents must be reported immediately to the PIU.
- Audits: The Supervision Consultant will use the Environmental Monitoring Checklist (Annex 11) to perform weekly safety audits of the site and labor camp.

7. Emergency Preparedness

- Medical Facilities:
 - On-Site: Fully stocked First Aid boxes and a designated first-aider will be available at the site office.
 - Referral: In the event of a serious medical emergency, workers will be transported to the nearest healthcare facility, such as the Kalaya Hospital or the District Headquarters Hospital.
- Emergency Response Plan: Protocols will be established for rapid evacuation in case of a fire or structural collapse during the demolition of the 16 quarters.
- Fire Safety: Fire extinguishers and sand buckets will be strategically placed at the labor camp kitchen, fuel storage areas, and electrical panels.
- Communication: Emergency contact numbers for the local Police, District Administration, and the nearest hospital will be prominently displayed at the site entrance.

Annex 10: KPRIISP Code of Conduct (GBV & SEA/SH Prevention)



Khyber Pakhtunkhwa Rural Investment & Institutional Support Project (KP-RIISP) **Responsible Authority:** KPRIISP E&S Unit | **Applicability:** All Staff, Consultants, Contractors

Definitions

To ensure clarity and alignment, basic key terms are defined below:

GBV (Gender-Based Violence):

GBV is an umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or private (2015 Inter-Agency Standing Committee Gender-based Violence Guidelines, pg. 5).

SEA (Sexual Exploitation and Abuse):

Sexual Exploitation: any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).

Sexual Abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 5).

SH (Sexual Harassment):

Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment. This may include unwelcome sexual advances, requests for sexual favors, and may take place through online activity or mobile communications as well as in person.

GRM (Grievance Redress Mechanism):

The KPRIISP has set up a GRM to respond to the concerned grievances in both community and workplace settings. Under the project's GRM there will be a dedicated GBV reporting mechanism ensuring confidentiality and survival centered approach. It will further ensure that every report is handled professionally, with the survivor's safety, dignity, and access to support services as top priorities.

1. General Responsibilities

All personnel must:

- Consent to a security background check.
- Treat all individuals (women, men, children, persons with disabilities, transgenders, etc.) with respect and dignity, free from discrimination.
- Comply with National & Provincial Laws, World Bank's Good Practice Note, GBV Risk Assessment Tool, and KPRIISP's GBV and SEA/SH Mitigation Plan.

Maintain a safe environment by:

- Ensuring workplaces are risk-free.
- Following emergency procedures (availability of first aid box, fire extinguishers, displaying of CoC in English, Urdu & local dialect and all mitigation measures must be in effect).
- Report concerns via KPRIISP's GRM or to the designated focal person.
- Attend mandatory annual GBV and SEA/SH training, with bi-annual refreshers for field teams.

2. GBV/SEA/SH and Child Protection

Prohibited Conduct:

- Inappropriate language/behavior, sexual advances, or transactional sex.
- Any sexual activity with children (consent or mistaken age is no defense).

Mitigation Measures:

- Report suspicions to the GBV Grievance Redress Committee/designated focal person.
- Ensure workplaces/communities are harassment-free as per the Khyber Pakhtunkhwa Protection Against Harassment of Women at Workplace (Amendment) Act, 2020.
- Collaborate with provincial/local authorities/NGOs to support survivors.

3. Contractor/Consultant Obligations

Contractors/consultant must:

- Implement CoC requirements in HR policies, site protocols, and grievance mechanisms.
- Ensure compliance is a condition of contract performance.

4. Accountability & Compliance

- Zero Tolerance: Violations lead to warnings, termination, or legal action.
- Confidentiality: Whistleblowers and survivors are protected.

Signature Section

By signing, I commit to upholding this Code:

Name: _____

Designation: _____

Organization: _____ (for contractors/consultants/staff)

CNIC: _____

Signature: _____

Date: _____

Reporting & Enforcement:

Focal Persons:

- PCMU: Senior Social Development Specialist/Gender Officer
- PIU: Senior Social Development Specialist/Gender Officer/ Established Arrangements

Process:

1. Report to focal persons via GRM (anonymous options available)/direct report to senior management.
2. Preliminary inquiry within 15 days.
3. Outcomes: Verbal/written warnings, disengagement, or legal referral.

4. Confidentiality: Survivor identities protected; retaliation prohibited.

Implementation Requirements

- Visual Display: Mount CoC in English, Urdu, and Pashto across offices.
- Onboarding: Include CoC in orientation kits for all personnel.

Approved by:

Project Director

Project Coordination and Management Unit (PCMU)

Khyber Pakhtunkhwa Rural Investment and Institutional Support Project (KP-RIISP)

Planning and Development Department, Khyber Pakhtunkhwa

Annex 11. Environmental Monitoring Checklist

Project Name: _____

Location: _____

Date of Monitoring: _____

Monitoring Team: _____

A. Air Quality and Dust Control

Parameter	Yes/No	Observations/Comments	Action Required
Dust suppression measures are in place (e.g., water sprinkling)			
Vehicles and machinery are well-maintained (no excessive smoke)			
Construction materials are properly covered during transport			
Ambient air quality monitored (PM10, PM2.5) if required			

B. Noise and Vibration

Parameter	Yes/No	Observations/Comments	Action Required
Noise levels within acceptable limits (dB)			
Use of silencers/mufflers on machinery and equipment			
Noise-sensitive receptors (schools, hospitals) identified and protected			

C. Soil and Erosion Control

Parameter	Yes/No	Observations/Comments	Action Required
Topsoil is stripped and stored properly			
Erosion control measures in place (e.g., silt fences, bunds)			
Excavation and filling carried out as per plan			

D. Water Resource Protection

Parameter	Yes/No	Observations/Comments	Action Required
No discharge of wastewater into water bodies			
Sanitation facilities for workers are provided			
Drinking water sources are protected from contamination			
Proper drainage and runoff management			

E. Waste Management

Parameter	Yes/No	Observations/Comments	Action Required
Solid waste is collected and disposed of properly			

Hazardous waste (oil, chemicals) is handled safely			
Reuse/recycling practices in place (if any)			

F. Biodiversity and Vegetation

Parameter	Yes/No	Observations/Comments	Action Required
Vegetation clearance minimized			
Replantation or landscaping measures planned/implemented			
No disturbance to local fauna/habitats			

G. Occupational Health & Safety

Parameter	Yes/No	Observations/Comments	Action Required
PPE provided and used by workers			
Safety signage is posted at the site			
Emergency response procedures are in place			
Medical screenings for laborers are conducted by the contractor every four months times			

H. Social Considerations

Parameter	Yes/No	Observations/Comments	Action Required
Community grievances mechanism in place			
Local community consulted			
No child labor or forced labor observed			

I. Labor Camp Management

Parameter	Yes/No	Observations/Comments	Action Required
Labor camp area is clean and solid waste is properly managed			
Adequate safety and security measures in place (lighting, gates/locks, boundary, guards)			
Labor camp located at a safe distance from nearby communities			
Clean and adequate living accommodations provided (ventilation, space, bedding)			
Clean and adequate washroom and bathing facilities available and functional			
Adequate and hygienic kitchen/cooking facilities available			
Clean and safe drinking water provided			
Separate facilities for male and female workers (if applicable)			
Camp rules and grievance mechanism communicated to workers			

Signature of Monitor: _____ Date: _____

Annex 12. Incident Reporting Format (ESIRT) Form

Details of Incident (e.g., to a worker or visitor) and Treatment		
Date of incident		
Time of incident		
Nature of incident	☐ Near miss ☐ First aid ☐ Medical treatment/doctor	
Name of injured person		
Address		
Occupation		
Date of birth		
Telephone		
Employer		
Activity in which the person was engaged at the time of injury		
Exact site location where injury occurred		
Nature of injury—e.g. fracture, burn, sprain, foreign body in eye etc.		
Body location of injury		
Treatment given onsite and Name of Treating Person		
Referral for further treatment? ☐ Yes ☐ No	Name of doctor or hospital	Medical certificate received? ☐ Yes ☐ No
Injury management required? ☐ Yes ☐ No	Return date	

Witness to Incident (Include all witnesses)	
Witness name and contact	

Details of Incident	
Date of incident	
Time of incident	
Details of damage to equipment or property	
Name of person who received the report	
Description of incident	

