

**Islamic Republic of Pakistan
Province of Khyber Pakhtunkhwa**

**Pakistan Public Resources for Inclusive
Development – Phase 2 of the Multiphase
Programmatic Approach: Khyber
Pakhtunkhwa (PforR)**

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

**DRAFT
For Appraisal**

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ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Islamic Republic of Pakistan (the Borrower) will cause the Province of Khyber Pakhtunkhwa (the Implementing Entity) to implement the Pakistan Public Resources for Inclusive Development – Phase 2 of the Multiphase Programmatic Approach : Khyber Pakhtunkhwa (PforR) (KP-PRID MPA, the Program), with the involvement of the Finance Department (FD), Board of Revenue (BoR), Planning and Development Department (P&DD), Excise Taxation & Narcotics Control Department (ET&NCD), Khyber Pakhtunkhwa Public Procurement Regulatory Authority (KP PPRA), Bureau of Statistics (BoS), Khyber Pakhtunkhwa Revenue Authority (KPRA), Elementary & Secondary Education Department (E&SED), and the Department of Health (DoH), as set out in the IBRD Loan Agreement and IDA Financing Agreement (the Agreements). The International Bank for Reconstruction and Development and International Development Association (hereinafter, the Bank) have agreed to provide financing for the IPF component of the Program (the Project), as set out in the Agreements.
2. The Borrower shall cause the Implementing Entity to ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreements, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank, the Borrower and the Implementing Entity, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower. The Borrower shall promptly disclose the updated ESCP.
5. The subsection on ‘Indicators for Implementation Readiness’ below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the ‘Timeframe’ column below irrespective of whether they are listed in the referred subsection.

Material Measures and Actions		Timeframe	Responsible Entity/Authority
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	ORGANIZATIONAL STRUCTURE Establish and maintain an organizational structure at Project Management Unit (PMU) housed at Finance Department with qualified staff and resources to support management of E&S risks and impacts of the Project including an Environmental and Social Specialist. Implementing agencies Finance Department (FD), Board of Revenue (BoR), Planning & Development Department (P&DD), Bureau of Statistics (BoS), Excise Taxation & Narcotics Control Department (ET&NCD), Elementary & Secondary Education Department (E&SED), Department of Health (DoH), Khyber Pakhtunkhwa Procurement Regulatory Authority (KPPRA) and Khyber Pakhtunkhwa Revenue Authority will designate focal points to support implementation of E&S commitments. The PMU will be responsible for the implementation and monitoring of E&S activities.	<i>Six months after the Project effectiveness</i>	PMU- KP-PRID MPA
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the following capacity building measures: • training for PMU staff, relevant stakeholder identified during Project implementation , relevant departments staff and focal persons, Project workers on: ○ Overview of the World Bank Environmental and Social Framework ○ Bank applicable/relevant ESS on the Project ○ E&S requirements for technical assistance activities ○ Compliance Monitoring and reporting requirements ○ Grievance Mechanism (GM), including Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)-sensitive GM ○ E-waste Management ○ Labor Management Procedures (LMP) ○ Health and Safety (H&S) ○ Emergency Response Preparedness (ERP) ○ World Bank Environmental and Social Incident Reporting Toolkit	<i>Throughout the Project implementation (where required) periodically.</i>	PMU- KP-PRID MPA
MONITORING AND REPORTING			

C	REGULAR REPORTING Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP, • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan, • Number of complaints submitted to the grievance mechanism (GM) and progress in resolving them including worker and SEA/SH complaints (reported in anonymized form), • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports, and • Number and status of resolution of incidents and accidents reported under action E below.	<i>Biannual ESHS Progress Report throughout the Project implementation, to be submitted within two weeks after completion of each half of the year (e.g., by July 14 and December 14).</i>	PMU- KP-PRID MPA
D	CONTRACTORS MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.	<i>Submit the monthly reports to the Bank as annexes to the reports to be submitted under action C above.</i>	PMU- KP-PRID MPA

E	INCIDENTS AND ACCIDENTS Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; allegations of SEA/SH; or disease outbreaks. Provide available details of the incident or accident to the Bank upon request. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	<i>Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request.</i> <i>Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</i>	PMU- KP-PRID MPA
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENT AND/OR PLANS 1. An Environmental & Social screening checklist will be developed for the screening of any subprojects, and a negative list criterion will be established to be included in the Operations Manual (OM). 2. Adopt e-waste management Standard Operating Procedures (SOP), consistent with ESS3.	<i>Integrate E&S guidance and e-waste SOPs into the OM and prepare the OM within three months of the Effective Date</i>	PMU- KP-PRID MPA and Implementation Agencies

1.2	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, code of conduct, into the Environmental, Social, Health and Safety (ESHS) specifications of the procurement documents and contracts with consulting firms supporting TA component and IT procurement. Thereafter ensure that the consulting firms comply with the ESHS specifications of their respective contracts. Provide copies of the relevant contracts with consulting firms to the Association. These requirements include, inter alia: • All consulting firms will submit and then implement the code of conduct that will apply to their staff, including on SEA/SH. • All consulting firms will be required to comply with the ESHS specifications of their respective contracts. • The consulting firms shall submit a Forced & Child Labor Declaration prohibiting the use of child and forced labor involved therein project.	<i>Prior to the preparation of procurement documents and issuing bidding documents.</i> <i>Consulting firms' supervision (on implementation) throughout project implementation.</i>	PMU- KP-PRID MPA with support from Procurement Specialist and Implementation Agencies
1.3	TECHNICAL ASSISTANCE Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, surveys and environmental and social assessments in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs and with the Environmental and Social Systems Assessment (ESSA) recommendations (such as the specific studies/assessments focusing on capturing the resource efficiency gained particularly on energy use, water availability and productivity during the course of project implementation, and implementation of e-waste SOPs). Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.	<i>Throughout Project implementation</i>	PMU- KP-PRID MPA

1.4	USE OF BORROWER'S ENVIRONMENTAL AND SOCIAL FRAMEWORK The Borrower Framework will be partially used for the following: Develop and implement environmental assessments (Initial Environmental Assessment/Environmental Impact Assessment) for projects that could cause physical environmental changes as per Pakistan Environmental Protection Act 1997 and Pakistan Environmental Protection Act (1997), if required. Ensure that the labor management and working conditions of Project workers are consistent with this ESCP and with the Borrower's labor framework, which includes, inter alia, the country's relevant policy, legal and institutional framework, including its national, departmental, or local implementing institutions, and the applicable laws, regulations, procedures, and implementation capacity. Promptly notify the Bank of any changes to the Borrower's E&S Framework that may materially adversely affect the Borrower's ability to manage the E&S risks and impacts of the Project in line with the ESSs and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Bank, such changes adversely affect relevant ESHS risk management aspects of the Project, the Borrower shall agree to implement measures and actions to address them in a manner acceptable to the Bank. The ESCP shall be updated to reflect such agreed actions	<i>Throughout Project implementation Notify the Bank immediately after taking notice of the change to the Borrower's E&S Framework.</i> <i>Subsequent actions, if requested by the Bank, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.</i>	PMU- KP-PRID MPA and Implementation Agencies
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES: Prepare and implement the Labor Management Procedures (LMP) for the Project as part of the Project Operations Manual (POM). The LMP will contain inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (OHS) (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	Same timeframe as POM	PMU- KP-PRID MPA

2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Develop and Implement the Occupational, health and safety (OHS) measures to assess and manage the OHS risks and impacts of the Project as part of the LMP included in the POM. The OHS measures shall be included in the bidding documents, contractors' contracts and ensure compliance by the Contractors.	<i>Same timeframe as LMP</i>	PMU- KP-PRID MPA
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS A grievance mechanism for Project workers will be established, maintained, and operated. The GRM should also be designed to address labor-related GBV/SEA/SH issues including provision of a referral system.	<i>Grievance Mechanism to be established and made operational prior to engaging any project workers and maintained throughout Project</i>	PMU- KP-PRID MPA

		<i>implementation.</i>	
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	E-WASTE MANAGEMENT PLAN Adopt and Implement an E-waste management plan as part of the OM prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS 3, as the project will generate considerable amount of E-waste through procurement of IT equipment.	<i>Same timeframe as OM</i>	PMU- KP-PRID MPA
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities including those related to hazardous substance resulting from unsafe recycling practices of e-waste that might affect the health and safety of workers and the community and include appropriate mitigation measures in the OM.	<i>Same timeframe as OM</i>	
4.2	SEA AND SH RISKS Ensure implementation of SEA/SH risk mitigation measures including: codes of conduct for project workers and consultants; awareness and training; confidential grievance handling procedures; referral pathways for survivors; and integration of SEA/SH provisions into worker and project grievance mechanisms.	<i>Throughout Project implementation.</i>	PMU- KP-PRID MPA
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Update, disclose and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	<i>Update and disclose the SEP prior to Negotiations, and thereafter implement the SEP throughout Project implementation.</i>	PMU- KP-PRID MPA
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, operate, and maintain the GM to ensure accessibility, transparency, and effectiveness in addressing concerns and grievances related to the Project in a manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The GM shall be equipped to receive, register, and facilitate the resolution of SEA/SH. The GM shall provide multiple channels for submission of grievances, including digital and non-digital options, and shall be accessible to vulnerable and digitally excluded populations. Pending the establishment of the Project-specific GM, the Borrower shall utilize the following existing provincial and national grievance platforms as interim channels for receiving and resolving Project-related complaints: (i) the Pakistan Citizen Portal (PCP); and (ii) Ikhtiar Awaam Ka. The Borrower shall ensure that both platforms are adequately publicized to Project-affected parties and that complaints received through them are tracked, documented, and reported to the Bank in accordance with the Project's monitoring and reporting requirements.	<i>Establish the GM with three (3) months of Project Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.</i> <i>Pending establishment of the GM, utilize the Pakistan Citizen Portal (PCP) and Ikhtiar Awaam Ka as interim channels.</i>	PMU- KP-PRID MPA
INDICATORS FOR IMPLEMENTATION READINESS			
	The following actions are indicators for implementation readiness: - Organizational structure established (Action A) - Project GM operational (10.2) - POM including E&S screening checklist and Labor Management Procedures prepared and approved (1.1)		