

**Islamic Republic of Pakistan
Province of Sindh**

**Karachi Solid Waste Emergency and Efficiency Project
(P173021)**

**[Draft]
ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

[July 7, 2020]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Islamic Republic of Pakistan (hereinafter the Recipient) will implement the Karachi Solid Waste Emergency and Efficiency Project (the **Project**), with the involvement of the Province of Sindh, through Sindh Solid Waste Management Board (SSWMB) and Karachi Metropolitan Corporation (KMC). The International Development Association (hereinafter the Bank) has agreed to provide financing for the Project.
2. The Recipient will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
4. The Recipient will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF), Environmental Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), Resettlement Framework (RF), Resettlement Plan (RP), Labor Management Procedure (LMP), Gender-Based Violence/Sexual Exploitation and Abuse and Violence Against Children (GBV/SEA and VAC) Action Plan, Environmental and Social Audit, and Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and the Recipient, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the Recipient. The Recipient will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	REGULAR REPORTING: Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, the implementation of the ESCP, status of preparation and implementation of E&S management tools /documents required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).	Quarterly throughout Project implementation within 15 days of end of a calendar quarter	SSWMB, based on recommendations from the Project's environmental specialist and social specialists.
B	INCIDENTS AND ACCIDENTS Promptly notify the PIU, which in turn will notify the Bank of any incident or accident related to the Project (especially component 2.1) which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers or any other affected party, due to the risks identified in the environmental and social assessment. PIU will provide enough details regarding the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.	Promptly within 24 hours after learning of the incident or accident. A detailed report can follow within a timeframe agreed at the time with the Bank.	SSWMB
C	CONTRACTORS MONTHLY REPORTS In contracts for works using the Bank's standard procurement documents, contractors are required to provide monthly monitoring reports to the Project Implementing Unit. Such monthly reports would be submitted to the Bank by the Borrower upon request.	Monthly throughout Project implementation within seven days of end of a calendar month.	SSWMB, based on recommendations from the Project's environmental specialist and social specialists.
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE: The SSWMB shall establish and maintain a PIU with qualified staff and resources to support management of ESHS risks and impacts of the Project <i>including</i> one Environmental Specialist, one Health and Safety Specialist, one Resettlement Specialist and one Social Development Specialist (for gender, community engagement, SEP, GRM) (total four specialists).	Within 60 days of the Effective Date Retain the specialists for the entire period of Project implementation	SSWMB

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. Carry out Environmental and Social Audit engaging third party consulting firm to review the compliance status of emergency operation under Component 1 with the Bank’s Environment and Social Standards (ESSs), the EHSs, other relevant Good International Industry Practice (GIIP) and national regulations, in a manner acceptable to the Bank. Retroactive financing will be approved and made available upon implementation of the corrective action plan based on the E&S audit findings</p> <p>b. Assess the environmental and social risks and impacts of proposed Project activities, in accordance with <i>Environmental and Social Management Framework (ESMF)</i> including to ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project. The ESMF will include environmental and social screening criteria for selecting sub-project areas and for proposing environmental and social management measures. The ESMF will also include the environmental and social audit process and requirements for activities under Component 1 which are to be financed retroactively. A draft ESMF will be prepared and disclosed before the approval of the project by the World Bank Board. The draft ESMF will be updated, cleared by the Bank, and publicly disclosed.</p>	<p>a. Within 60 days of Effective Date and implement the remedial measures, if any, prior to submission of retroactive claim. Retroactive financing will be approved and made available upon implementation of the E&S Audit Action Plan based on the E&S audit findings</p> <p>b. Prepare and disclose the draft ESMF before Board approval. Update the draft ESMF, have it cleared from the Bank, and re-disclose within 60 days of the Effective Date.</p>	<p>a. <i>SSWMB PIU and KMC, based on the recommendations from the Environmental & Social Specialists</i></p> <p>b. <i>SSWMB PIU, based on the recommendations from the Environmental & Social Specialists</i></p> <p>c. <i>SSWMB PIU, based on the recommendations from the Environmental & Social Specialists</i></p> <p>d. <i>SSWMB PIU, through its Project Director</i></p> <p>e. <i>SSWMB PIU, based on the recommendations from the Environmental & Social Specialists</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>c. Prepare, disclose, adopt, and implement any Environmental and Social Impact Assessments (ESIAs) Environmental and Social Management Plans (ESMPs) and other instruments required for the activities under Component 2, namely:(i) design and construction of a new landfill cell at Jam Chakro dumpsite, (ii) design and construction of a Material Recovery Facility, (iii) implementation of measures to improve safety and environmental performance of the Jam Chakro dumpsite, (iv) progressive closure and rehabilitation of areas that have no additional capacity to receive more waste, (v) development and implementation of community support plan for waste pickers living at Jam Chakro, (vi) construction/ upgrading of transfer stations, (vii) retrofitting of existing and construction of new Kachra Kundis, (viii) development of Advanced Waste Solutions for Karachi, in accordance with the ESSs, the ESMF, the EHSGs, and other relevant Good International Industry Practice (GIIP) in a manner acceptable to the Bank. The ESIAs and ESMPs will be made part of the bidding documents for any contractors, as and when required. ESIAs and ESMPs will be prepared by the independent consultants. ESIA for (iv) should include the evaluation and remediation of legacy contamination issues.</p> <p>d. Prepare, adopt, and implement, after clearance from the Bank, an Action Plan to prevent gender-based violence/sexual exploitation and abuse (GBV/SEA) and violence against children (VAC) to assess and manage the risks of GBV/SEA and VAC</p> <p>e. Incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p>	<p>c. Before issuing the bidding documents, and thereafter throughout the carrying out of such activities.</p> <p>d. Prepare and disclose, after Bank clearance, within 60 days of Effective Date.</p> <p>e. Before launching the procurement process for the relevant Project activities, and thereafter throughout the carrying out of such activities.</p>	

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1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans including ESMPs prepared for each activity, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	<p>Prior to the preparation of procurement documents. Supervise contractors throughout Project implementation.</p>	<p>SSWMB PIU, based on the recommendations from the Environmental & Social Specialists</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT:</p> <p>SSWMB will develop stand-alone Labor Management Procedures (LMP) in accordance with ESS2 which will be applicable for all type of workers likely to be involved in the project. The LMP will also include measures to address Gender-Based Violence and Sexual Abuse and Exploitation (GBV/SEA) and Violence Against Children (VAC) related issues (in line with the GBV/SEA and VAC Action Plan under ESS1). Labor management requirements will be included in bidding and contract documents for all contractors and supervising firms to implement.</p>	<p>The LMP will be prepared within 60 days of the Effective date and prior to issue of first bid for contract, and implemented throughout Project implementation.</p>	<p>SSWMB PIU</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>Grievance mechanism operational prior to engaging Project workers and maintained throughout Project implementation</p>	<p>SSWMB PIU</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in ESMF, ESIA and ESMPs to be prepared under action 1.2 above. The OHS measures will ensure appropriate working conditions, during and post public health emergency as the project will be implemented during the outbreak of COVID-19. OHS plans should be required to be prepared by the contractors.</p>	<p>Prior to contract mobilization, and thereafter throughout the carrying out of such activities.</p>	<p>SSWMB PIU, based on the recommendations from the Environmental & Social Specialists</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures will be covered under the ESMF, ESIA and ESMPs to be prepared under action 1.2 above.</p>	<p>Prior to the preparation of procurement documents, and thereafter throughout the carrying out of such activities.</p>	<p>SSWMB PIU, based on the recommendations from the Environmental & Social Specialists</p>
3.2	<p>Dredged Material Management</p> <p>Contractors are required to prepare Dredged Materials Collection, Transport, Disposal and Management Plan.</p>	<p>Prior to contract mobilization, and thereafter throughout the carrying out of such activities.</p>	<p>SSWMB PIU, based on the recommendations from the Environmental & Social Specialists</p>

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ESS 4: COMMUNITY HEALTH AND SAFETY		
4.1 TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMF, ESIA and ESMPs to be developed under action 1.2 above.	Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.	SSWMB PIU, based on the recommendations from the Environmental & Social Specialists
4.2 COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement Community Health and Safety Plan and Emergency Response Preparedness Plan, as part of ESMF, to assess and manage specific risks and impacts to the community arising from Project activities and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Bank.	Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.	SSWMB PIU, based on the recommendations from the Environmental & Social Specialists
4.3 GBV AND SEA RISKS: Adopt and implement measures and actions to assess and prevent GBV/SEA and VAC risks in line with the GBV/SEA and VAC Action Plan in the ESMF, ESIA, ESMPs to be developed under action 1.2 above.	Prepare and disclose, after Bank clearance, within 60 days of the Effective Date	SSWMB PIU, based on the recommendations from the Social Development Specialist
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		
5.1 RESETTLEMENT PLANS: a. In case the E&S Audit (conducted under 1.2(a) above) finds any impacts on livelihood and/or physical displacement (in keeping with ESS5) under Component 1, compensation for the affected person(s), in accordance with the RF, will be included in the Corrective Action Plan based on the E&S audit findings. Retroactive financing will be approved and made available upon implementation of the corrective action plan based on the E&S audit findings	a. Conduct E&S Audit within 60 days of Effective Date and implement the remedial measures, if any, prior to submission of retroactive claim. Retroactive financing will be approved and made available upon implementation of the E&S Audit Action Plan based on the E&S audit findings	SSWMB PIU, based on the recommendations from the Resettlement and Social Development Specialist

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>b. An early draft Resettlement Framework (RF) has been prepared and disclosed by appraisal, and will be updated (consistent with ESS5), cleared from the Bank, and re-disclosed publicly. The RF, among other details, will include measures to address encroachment impacts and to ensure that the sub-project sites for transfer stations, landfills, or treatment infrastructure for non-municipal waste streams follow ESS5. This will involve the application of criteria included in the RF to screen and select land for subprojects:</p> <p>(i) any removal of encroachments or resettlement from subproject sites where transfer stations, landfills, or treatment infrastructure for non-municipal waste streams, will be built or upgraded will be in accordance with the RF;</p> <p>(ii) the IAs will protect their transfer stations, landfills, or treatment infrastructure for non-municipal waste streams, from fresh encroachments;</p> <p>(iii) no upgradation or fresh construction of transfer stations, landfills, or treatment infrastructure for non-municipal waste streams, will take place on subproject sites where anti-encroachment measures have been taken since November 21, 2019 (the project initiation date in the Bank system) without provision of compensation in line with the RF;</p> <p>(iv) once project implementation begins, any unforeseen anti-encroachment activities which may take place on the subproject sites where transfer stations, landfills, or treatment infrastructure for non-municipal waste streams, will be built or upgraded will have to comply with the provisions of the project RF/RP, for any subproject to proceed.</p> <p>c. Prepare and disclose the RP for the Community of Waste Pickers at Jam Chakro in accordance with ESS5 and consistent with the requirements of the project RF and, thereafter, adopt and implement the RP before carrying out the associated activities, in a manner acceptable to the Bank.</p>	<p>b. Update the early draft RF (disclosed at appraisal), have it cleared from the Bank, and re-disclose within 60 days of the Effective Date. Screening reports submitted to the Bank for approval before the selection and finalizing of any subproject site for the development of transfer stations, landfills, or treatment infrastructure for non-municipal waste streams under the project.</p> <p>c. RP submitted for the Bank’s review and approval and disclosed prior to the issue of bids for rehabilitation activities. The RP should be implemented prior to commencing construction activities at Jam Chakro and handing over of the site.</p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>d. Prepare and disclose all other RPs, as required, in accordance with ESS5 and consistent with the requirements of the RF that has been prepared for the Project, and thereafter adopt and implement the respective RPs before carrying out the associated activities, in a manner acceptable to the Bank.</p> <p>e. Conduct regular monitoring of resettlement activities through an Independent Third-Party Monitor and in a manner acceptable to the Bank</p> <p>f. Prepare and disclose an Impact Evaluation of Resettlement outcomes, in a manner acceptable to the Bank</p>	<p>d. All RPs submitted for the Bank's review and approval and disclosed, prior to the issue of bids for corresponding activities involving resettlement impacts. The RPs should be implemented prior to the commencing of activities that require removal of encroachment and/or squatters from public land/land owned by IA</p> <p>e. Quarterly Independent Third-Party monitoring reports of resettlement activities submitted to the Bank for approval</p> <p>f. The Impact Evaluation of Resettlement Impacts to be prepared at the end of the resettlement process and submitted for Bank approval</p>	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above. In case ESIA/ESMPs identify significant biodiversity impacts, separate Biodiversity Management Plan would be prepared.	Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.	SSWMB PIU, based on the recommendations from the Environmental Specialist
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Not relevant		
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS: Prepare, adopt, and implement the chance finds procedure described in the ESMF, ESIA/ESMPs developed for the Project.	Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.	SSWMB PIU, based on the recommendations from the Environmental Specialist
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN: a. Prepare, disclose, adopt, and implement a Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Bank	a. A Preliminary SEP is being prepared and disclosed and shall be updated, cleared by the Bank and re-disclosed within 60 days of the Effective Date.	SSWMB PIU, based on the recommendations from the Social Development Specialist

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	b. Report back to stakeholders according to the mechanisms prescribed in the SEP. Prepare and share with the Bank an annual report on the implementation of the SEP	b. Reporting to be done on a quarterly basis throughout project implementation. Annual reports to be prepared and shared with the Bank for review and approval throughout Project implementation	
10.2	PROJECT GRIEVANCE MECHANISM: Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Bank.	The project GRM will become operational no later than 30 days after the Effective date The GRM will be available throughout Project implementation.	SSWMB PIU through its PD
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training and capacity building initiatives for the Project will incorporate Environmental and Social aspects:</p> <p>Training for Contractors</p> <ul style="list-style-type: none"> • Grievance Redress Mechanism • Occupational Health and Safety issues for the project including COVID19 response • Community Health and Safety for local communities around project areas and waste pickers • Pollution Prevention and Control • Waste handling, storage, transportation, treatment and disposal • Traffic Safety • Emergency Response Preparedness • GBV/SEA & Child Protection (including Violence Against Children) • Disability Inclusion • Labor Management <p>Training for Project Staff (including PIU):</p> <ul style="list-style-type: none"> • Grievance Redress Mechanism • Stakeholder and Community Engagement and mapping • SEPA regulations and ESF • Preparation and implementation of ESMF, ESIA and ESMPs • Preparation and implementation of RF and RPs • Gender and Inclusion Issues 	Throughout the implementation of the Project. An annual training program and calendar will be prepared and at the beginning of each year and shared with the Bank	SSWMB PIU, based on the recommendations from the Environmental, Resettlement and Social Development Specialists

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<ul style="list-style-type: none"> • Mitigation against Gender Based Violence and Violence Against Children • Emergency Response Preparedness • Supervision, Monitoring and Reporting • Documentation and Reporting • Labor Management 		

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