

Government of Khyber Pakhtunkhwa

**– Resilience, Early Action and Disaster
Readiness for Khyber Pakhtunkhwa
(P512715)**

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

Final Draft

February 19th, 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Pakistan (the Recipient) will cause the Government of Khyber Pakhtunkhwa (the Project Implementing Entity) to implement the Resilience, Early Action, and Disaster Readiness for Khyber Pakhtunkhwa (READY-KP) Project (the Project), with the involvement of the Irrigation Department, GoKP, and Relief, Rehabilitation & Settlement Department, GoKP as set out in the Financing Agreement and the Project Agreement (the Agreements). The International Development Association (the Association) has agreed to provide financing for the Project, as set out in Agreements.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. 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 Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, 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 Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative. The Recipient 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
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>1. Establish and maintain two Project Implementation Units, one in each of Irrigation Department and Relief, Rehabilitation & Settlement Department with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including dedicated Environmental, Social Development, and Occupational Health and Safety (OHS) Specialists in each PIU (2 positions in each PIU), as well as a Gender Specialist to support both PIUs.</p> <p>2. Project Supervision Consultant and Contractors will appoint qualified E&S specialists in similar capacity as PIUs with all necessary material resources, which will support environmental and social screening, supervision and monitoring to include the development and implementation of additional E&S instruments as required.</p> <p>3. The Project will execute Third-Party Validation (TPV) for annual monitoring of E&S compliance progress during project implementation</p>	<p>1. Hire all positions within 60 days of Project effectiveness and maintain these positions throughout Project implementation</p> <p>2. Before commencement of Project physical works</p> <p>3. Annually throughout project implementation</p>	<p>PIUs</p> <p>PSC and Contractors</p> <p>PIUs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ul style="list-style-type: none"> • training for Project staff and workers on: <ul style="list-style-type: none"> ○ OHS ○ Resource conservation ○ Waste management ○ Cultural sensitivity and code of conduct ○ GBV and SEA/SH ○ Grievance Redress Mechanism ○ Labor management ○ Stakeholder engagement ○ Incident reporting • training for communities and beneficiaries on: <ul style="list-style-type: none"> ○ Disaster preparedness ○ Health and hygiene ○ Digital and social inclusion ○ GRM • training for implementing agencies on: <ul style="list-style-type: none"> ○ Cultural sensitivity and code of conduct ○ GBV and SEA/SH ○ Grievance Redress Mechanism ○ Stakeholder engagement ○ Incident reporting ○ Technical capacity ○ Specialized response, particularly with regard to gender sensitivity 	Throughout Project implementation, including whenever new workers are engaged.	PIUs
MONITORING AND REPORTING			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • 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. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. • Summary of land acquisition 	<p>Quarterly reports submitted to the World Association throughout Project implementation. Each report to be submitted no later than 21 days after the end of each reporting quarter.</p>	<p>PIUs</p>
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>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 PIUs.</p>	<p>Submit monthly reports to the PIUs no later than 7 days after the end of each reporting month, and by request to the Association.</p>	<p>Contractors and Supervision Firms</p>
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association 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; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	<p>PIUs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, 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.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS <ol style="list-style-type: none"> 1. Conduct a third-party Environment and Social audit of all activities eligible for retroactive financing in Action 1.5 below .PIUs to maintain all necessary documentation and record of such activities in compliance to ESF requirements. 2. Implement an Environmental and Social Management Framework (ESMF) for the Project prepared and disclosed, to screen and assess the environmental and social risks and impacts of the Project and suggest appropriate mitigation measures consistent with the relevant ESSs. 3. Prepare and implement the site-specific Environmental and Social Management Plans (ESMPs) as set out in the ESMF. The criteria described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project. 4. Contractors to prepare and implement site-specific instruments for the sub-projects (e.g. C-ESMPs) as directed by the ESMF, where required. 	<ol style="list-style-type: none"> 1. Prior to disbursement for activities subject to retroactive financing 2. Implement the ESMF throughout Project implementation. 3. Prepare the ESMPs and incorporate the ESMPs as part of the respective bidding documents for the respective subprojects prior to the carrying out of the subprojects that require the preparation of such ESMPs. Once finalized, implement the respective ESMP throughout Project implementation. 4. Prepare Contractors' plans prior to initiating physical activities for each subproject 	<p>PIUs</p> <p>PIUs</p> <p>Contractors</p>
1.2	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.	PIUs
1.3	TECHNICAL ASSISTANCE	Throughout Project implementation.	PIUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	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, feasibility studies, etc. in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.		
1.4	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>1. Ensure that the CERC Manual includes a description of the E&S assessment and management arrangements including, if applicable, any CERC-ESMF/ESMF Addendum for the implementation of all identified CERC components, in accordance with the ESSs.</p> <p>2. Implement the E&S provisions of the CERC Manual including, if applicable, the CERC-ESMF/ESMF Addendum, and any assessments and plans required therein.</p>	<p>1. The preparation of the CERC Manual in form and substance acceptable to the Association is a withdrawal condition under Section III.B.1[(c)] of Schedule 2 of the Financing Agreement.</p> <p>2. In accordance with the timeframes specified in the CERC Manual including, if applicable, the CERC-ESMF/ESMF Addendum, and any assessments and plans required therein.</p>	Responsible CERC Implementing Entity
1.5	<p>ACTIVITIES SUBJECT TO RETROACTIVE</p> <p>Prepare and adopt appropriate E&S documents (E&S checklists, ESMP, etc) for each retroactively financed activities</p> <p>Conduct a third-party E&S audit of all activities subject to retroactive financing, and implement any corrective actions, as required</p>	<p>Prior to carrying out said activities</p> <p>Prior to disbursement</p>	PIUs
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare and implement the Labor Management Procedures (LMP) for the Project as a standalone document, including provisions on working conditions, management of workers relationships, occupational health and safety, code of conduct and behavioral standards, forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervision firms.</p>	Prepare the LMP within 60 days of Project effectiveness and implement throughout Project implementation.	PIUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Require contractors to prepare and implement OHS Plans in accordance with the ESMF</p>	Prepare OHS Plan prior to initiation of sub-project activities and thereafter implement the plan throughout sub-project implementation	Contractors
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish Grievance Mechanism within 60 days of Project effectiveness, prior to engaging any project workers, and maintain throughout Project implementation	PIUs
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement a Waste Management Plan (WMP) as part of site specific ESMPs, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Same timeframe as for the implementation of the ESMF and ESMPs	PIUs
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMF and ESMPs, to be prepared under action 1.1 above.</p>	Same timeframe as for the implementation of the ESMF and ESMPs	PIUs
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMF to be prepared under action 1.1 above.</p>	Same timeframe as for the preparation and implementation of the ESMPs	PIUs
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, risks of labor influx, air and noise pollution, spread of communicable diseases, GBV/SEA/SH, and culturally inappropriate behavior, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	Same timeframe as for the preparation and implementation of the ESMPs.	PIUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.3	<p>SEA AND SH RISKS</p> <p>Prepare and implement a standalone GBV/SEA/SH Action Plan, to assess and manage the risks of SEA and SH.</p>	Prepare the GBV/SEA/SH Action Plan within 60 days of Project effectiveness, and thereafter implement the SEA/SH Action Plan throughout Project implementation.	PIUs
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities. Contractors shall prepared site-specific Security Management Plans as part of the C-ESMPs</p>	Same timeframe as for the preparation and implementation of the ESMPs	Contractors
4.5	<p>DAM SAFETY (FOR ANNEX A ESS4)¹ [Identify dam safety measures depending on the specific circumstances of the Project, as noted under paragraph 4 of Annex A of ESS4.]</p> <ol style="list-style-type: none"> 1. Adopt dam safety measures designed by qualified engineers, consistent with Good International Industry Practice (GIIP) 2. Include requirements in the Terms of Reference (TORs) for feasibility of large dams as required under paragraph 4 of Annex A of ESS4 	<ol style="list-style-type: none"> 1. Same timeframe as for the preparation and implementation of site specific ESMPs 2. When preparing the TORs for the Feasibility study of large dams 	PIUs
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

¹ The project will not finance any large dam (as per definition under ESS4) under the project, and may only support feasibility of large dams.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	<p>RESETTLEMENT FRAMEWORK AND PLANS</p> <p>1. Implement a Resettlement Framework prepared and disclosed for the Project, consistent with ESS5.</p> <p>2. Prepare and implement a Resettlement Plan (RP) for each activity under the Project for which such an RP is required, as set out in the RF and consistent with ESS5.</p>	<p>1. implement the RF throughout Project implementation.</p> <p>2. Prepare and implement the respective RP prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.</p>	PIUs
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>1. Adopt and implement mitigation measures related to biodiversity risks and impacts as part of the ESMF consistent with ESS6</p> <p>2. Prepare a Biodiversity Management Plan (BMP) consistent with ESS6 objectives to ensure No Net Loss of biodiversity in natural habitats.</p>	<p>1. Same timeframe as implementation of the ESMF</p> <p>2. Prepare BMP prior to initiation of sub-project activities and thereafter implement the plan throughout sub-project implementation</p>	PIUs
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
7.1	<p>INDIGENOUS PEOPLES FRAMEWORK AND PLANS</p> <p>1. Prepare and implement an Indigenous Peoples Planning Framework (IPPF) for the Project, consistent with ESS7.</p> <p>2. Prepare and implement an Indigenous Peoples Plan (IPP) [for each activity under the Project for which such IPP is required, as set out in the IPPF, consistent with ESS7.</p>	<p>1. Prepare the IPPF within 60 days of Project effectiveness and thereafter implement the IPPF throughout Project implementation.</p> <p>2. Prepare the IPP prior to the carrying out of any activity that requires the preparation of such IPP. Once finalized, implement the respective IPP throughout Project implementation.</p>	PIUs
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>Describe and implement the chance finds procedures, as part of the ESMF</p>	Same timeframe as for the implementation of the ESMF	PIUs
ESS 9: FINANCIAL INTERMEDIARIES			
	ESS9 is not relevant to the Project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) prepared and disclosed at appraisal 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.</p>	Implement the SEP throughout Project implementation.	PIUs
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p>	Establish the grievance mechanism within 60 days of Project effectiveness, and thereafter maintain and operate the mechanism throughout Project implementation.	PIUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.		
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> - A – Organizational Structure - 1.1 – Environmental and Social Assessments and Plans - 2.1 – Labor Management Procedures - 2.3 – Grievance Mechanism for Project Workers - 3.1 – Waste Management Plan - 4.3 – SEA and SH Risks - 5.1 – Resettlement Framework and Plans - 7.1 – Indigenous Peoples Frameworks and Plans - 10.1 – Stakeholder Engagement Plan - 10.2 – Project Grievance Mechanism 			