



Islamic Republic of Pakistan
Punjab Clean Air Program: P508222

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

Negotiated Version

DRAFT

February 28, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Government of the Punjab will implement the Punjab Clean Air Program - IPF Component (the Project), with the involvement of the Planning & Development Board (P&D), Environmental Protection & Climate Change Department (EP&CCD), Transport & Masstransit Department (T&MD), Industries, Commerce & Investment Department and Agriculture Department. The International Development Association (the Association), has agreed to provide financing for the Project, as set out in the Financing Agreement (Agreement).
2. The Implementing Entity (IE) 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 Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the IE 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 Agreement, the IE shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the IE, 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 IE agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the IE's Representative specified in the IE Agreement. The IE 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 SUPPORT¹			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. Establish and maintain an Environmental and Social Management team within the Program Coordination & Monitoring Unit (PCAP-CMU) at P&D and Program Implementation Unit (PIU) at T&MD with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including Environment Specialist and Social/Gender Specialist.</p> <p>b. Nominate E&S focal points at other agencies responsible for Project activities including, Environmental & Climate Change Department, Punjab Mass Transit Authority, and Punjab Transport Company.</p>	<p>a. Hire or appoint an environment specialist and a social and gender specialist to the PCAP-CMU and PIU (total two positions each) no later than sixty (60) days after the Effective Date of the Loan Agreement and maintain these positions throughout Project implementation.</p> <p>b. Nominate E&S focal points at other agencies no later than sixty (60) days after the Effective Date of the Loan Agreement</p>	<p>PCAP-CMU,P&D and PIU T&MD</p> <p>Secretaries of Environmental & Climate Change Department, Industries, Commerce & Investment Department, Agriculture Department, and T&MD (for Punjab Mass Transit Authority, and Punjab Transport Company)</p>
B	<p>Prepare and implement the following capacity building measures:</p> <p>a. Training for relevant PCAP-CMU, PIU and other agencies staff on:</p> <ul style="list-style-type: none"> • Association ESF policy • Stakeholder engagement and grievance mechanism (GM), including GM for Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) • Gender Based Violence (GBV)/SEA/SH • Labor Management Procedures • Community and occupational health and safety aspects especially related to T&MD activities • E-waste management • Battery waste management • E&S Screening 	<p>At the start of project implementation and annual refreshers.</p>	<p>PCAP-CMU, P&D and PIU, T&MD</p>
MONITORING AND REPORTING			
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>	<p>Submit bi-annual reports to the Association throughout Project</p>	<p>PCAP-CMU, P&D in coordination with</p>

¹ For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<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. Number and status of resolution of incidents and accidents reported. 	implementation, commencing after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.	concerned departments
D	<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; forced or child labor; displacement without due process (forced eviction); allegations of SEA, or SH; or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>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.</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>	PCAP-CMU, P&D in coordination with concerned departments
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the technical assistance and assessments required to facilitate Program implementation including design interventions to support air quality improvements 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.</p> <p>The TA will include assessments on i) Buyback scheme; ii) Battery waste management; iii) E-bus Business Models study ; iv) Electric two- and three-wheeler adoption; v) Carbon credits (Transport); vi) Transport surveys and public perception studies; vii) Industrial detailed study; and any other studies conducted during the life of the project.</p>	Throughout Project implementation	PCAP-CMU, P&D, PMA, PPTA and PIU, T&MD
1.2	<p>USE OF BORROWER ENVIRONMENTAL AND SOCIAL FRAMEWORK</p> <p>a. Ensure that the E&S risks and impacts of the Project, are managed in accordance with this ESCP and the Borrower's E&S Framework, which includes, inter alia, the national and provincial relevant policy, legal and institutional framework, including national, departmental, or local implementing institutions and applicable laws, regulations, procedures, and implementation capacity.</p>	a. Throughout Project implementation.	PCAP-CMU, P&D and PIU, T&MD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>b. Promptly notify the Association 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 ensuing potential risks and impacts of the Project. If, in the opinion of the Association, 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 Association. The ESCP shall be updated to reflect such agreed actions.</p>	<p>b. Notify the Association immediately after taking notice of the change to the Borrower’s E&S Framework. Subsequent actions, if requested by the Association, shall reflect in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.</p>	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Ensure that Project workers are engaged in the implementation of the Project in accordance with ESS2. To this end, implement the following measures:</p> <p>a) Provide direct and contracted workers with information and documentation that is clear and understandable regarding their terms and conditions of employment through written contracts setting out their rights, including, inter alia, rights related to hours of work, wages, overtime, compensation, and benefits, as well as written notice of termination of employment, and details of severance payments, as applicable;</p> <p>b) Implement occupational health and safety (including emergency preparedness and response) measures, taking into account the General Environmental, Health and Safety Guidelines (EHSGs), and other Good International Practice (GIP), as relevant;</p> <p>c) Implement measures, as applicable, to, inter alia: (i) prevent the use of all forms of forced labor and child labor; (ii) enable workers to benefit from, inter alia, access to grievance mechanisms without fear of retaliation; and (iii) provide effective freedom to form and join workers organizations or alternative mechanisms for expressing their concerns and protect their rights related to labor and working conditions;</p> <p>d) Develop a code of conduct for workers, which shall include measures to prevent and respond to sexual exploitation and abuse, and sexual harassment (SEA/SH) cases; and</p> <p>e) Incorporate the relevant requirements above in the E&S specifications of the procurement documents and contracts with third parties that engage contracted workers in the implementation of the studies.</p>	<p>Measures to be put in place no later than ninety (90) days after Project Effectiveness, and thereafter ensure implementation throughout Project implementation</p>	<p>PCAP-CMU, P&D PIU, T&MD</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Ensure access to a grievance mechanism for all project workers.</p>	Ensure access to a grievance mechanism within 90 days of Project Effectiveness and thereafter maintain and operate it throughout Project implementation.	PCAP-CMU, P&D and PIU, T&MD
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>i. Adopt E-Waste Management Standard Operating Procedures (SOPs) within IAs.</p> <p>ii. Include environmentally safe disposal options for solid waste, e-waste and battery waste in the studies conducted under TA (as mentioned in section 1.1 above) where relevant, consistent with ESS3.</p>	<p>i. Within 6 months of project commencement.</p> <p>ii. At the time of finalization of each relevant study</p>	<p>i. SOP to be provided by EP&CCD and implementation enabled by PCAP-CMU, P&D</p> <p>ii. PCAP-CMU, P&D and PIU, T&MD</p>
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>TORs of all relevant TAs will be screened to ensure ESS3 requirements, including resource efficiency and pollution prevention and mitigation, are taken into consideration.</p>	At the time of finalizing the TORs	PCAP-CMU, P&D and PIU, T&MD
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY</p> <p>TORs of all relevant TAs will be screened to ensure ESS4 requirements are taken into consideration.</p>	At the time of finalizing the TORs	PCAP-CMU, P&D and PIU, T&MD
4.2	<p>SEA AND SH RISKS</p> <p>TORs of all relevant TAs will be screened to ensure SEA and SH risks are taken into consideration.</p> <p>Adopt and implement SEA/SH risk mitigation measures</p>	<p>At the time of finalizing the TORs</p> <p>At the time of finalizing of the SEA/SH Action Plan (to be prepared under PforR)</p>	PCAP-CMU, P&D and PIU, T&MD
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT – NOT CURRENTLY RELEVANT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES – NOT CURRENTLY RELEVANT			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES – NOT CURRENTLY RELEVANT			
ESS 8: CULTURAL HERITAGE – NOT CURRENTLY RELEVANT			
ESS 9: FINANCIAL INTERMEDIARIES – NOT CURRENTLY RELEVANT			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Update as needed 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.</p>	Update the SEP as needed no later than sixty (60) days from Project Effectiveness and thereafter implement the SEP throughout Project implementation.	PCAP-CMU, P&D and PIU, T&MD
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Adopt, publicize, maintain, and operate an accessible grievance mechanism building on existing mechanisms, 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> <p>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.</p>	Establish the grievance mechanism no later than sixty (60) days from Project Effectiveness, and thereafter maintain and operate the mechanism throughout Project implementation	PCAP-CMU, P&D and PIU, T&MD
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <p>A. Establish E&S Management Teams no later than sixty (60) days from Project Effectiveness</p> <p>2.1 Adopt Labor Management Measures no later than ninety (90) days from Project Effectiveness</p> <p>10.1 Update as needed Stakeholder Engagement Plan (SEP) no later than sixty (60) days from Project Effectiveness</p> <p>10.2 Establish the grievance mechanism no later than sixty (60) days from Project Effectiveness</p>			