

**Islamic Republic of Pakistan**

**Ministry of Commerce**

**Pakistan Goes Global (P170271)**

**Draft**

**Environmental and Social Commitment Plan (ESCP)**

**July, 2020**

**Government of Pakistan**

**Ministry of Commerce**

**Pakistan Goes Global Project (P170271)**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Islamic Republic of Pakistan will implement the Pakistan Goes Global Project (the Project), with the involvement of the following Ministries/agencies/units: Ministry of Commerce (leading agency, MoC), the Trade Development Authority of Pakistan (TDAP), and the Board of Investments (BoI) (together “Implementing Agencies”). The International Bank for Reconstruction and Development (hereinafter, the Bank) has agreed to provide financing for the Project.
2. The Islamic Republic of Pakistan 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 Islamic Republic of Pakistan will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, whether they have already been or are to be adopted, such as the Environment & Social Screening Report, Labor Management Procedures (LMP), Stakeholder Engagement Plan (SEP), E-Waste Management Plan (E-WMP), and Labor Management Plan (LMP), and the timelines specified in those E&S documents.
4. The Islamic Republic of Pakistan 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.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by MoC 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 Islamic Republic of Pakistan, 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 Islamic Republic of Pakistan 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 Islamic Republic of Pakistan. The Islamic Republic of Pakistan 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 Islamic Republic of Pakistan shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts that are relevant to the Project, such as improper disposal of E-waste, discrimination or exclusion of small or minority firm owners, inadequate implementation of labor management procedures, and/or poor performance of GRMs set up under the Project.

| **Material Measures and Actions** | | **Timeframe** | **Responsible Entity/Authority** |
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| **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 documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s) as well as COVID-19 related considerations as per requirements. | *Six-monthly, by January 15 and July 15 of each year throughout the Project implementation.* | Shared Services Unit (SSU), through MOC |
|  | **INCIDENTS AND ACCIDENTS**  Promptly notify the Bank of any incident or accident related to the Project, which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public, workers *or any other affected party*.  Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Bank’s requests, prepare a report on the incident or accident and propose any measures to prevent its recurrence. | *Promptly after taking notice of the incident or accident and within 48 hours of incident. A subsequent report would be provided within a timeframe acceptable to the Bank/Association, as requested* | Implementing Agencies (IAs), through Project Directors |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** | | | |
| 1.1 | **ORGANIZATIONAL STRUCTURE**  Establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks, including the hiring of a fulltime Environmental and Social Specialist in/by the Shared Services Unit (SSU) and the designation of an environmental and social focal point by and for each PIU | *E&S, M&E and Communication specialists: by not later than three months after Effective Date*  *E&S focal points: by Effective Date* | PMU MOC, through its Project Director |
| 1.2 | **ENVIRONMENTAL AND SOCIAL SCREENING**  Update, adopt, and implement, the Environmental and Social Screening Report that has been prepared for the Project, in a manner acceptable to the Bank | *Throughout Project implementation* | SSU, through MoC |
| 1.3 | **MANAGEMENT TOOLS AND INSTRUMENTS**  Prepare, adopt, and implement the  *E-Waste Management Plan with SOPs* in a manner acceptable to the Bank, throughout Project implementation. | *Prior to the issuance of the first bidding document and/or procurement order* | SSU, through MOC and IAs |
| 1.4 | **MANAGEMENT OF CONTRACTORS**  Develop and implement procedures for managing contractors and subcontractors and thereafter ensure that contractors comply with said procedures. | *Prior to the issuance of the first bidding document and/or procurement order* | SSU, through MOC, with support from Procurement Specialist |
| 1.5 | **PERMIT, CONSENTS AND AUTHORIZATIONS**  Obtain and/or assist in obtaining, as appropriate on recurrent basis, the permits, consents and authorizations that are applicable to the Project from relevant national authorities.  Comply, or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation. | *Throughout Project implementation* | Project Director, through MOC and IAs |
| 1.6 | **THIRD PARTY MONITORING**  Hire an independent third-party monitoring agent to verify compliance against ESCP and all the instruments prepared under it. | *Annually throughout Project implementation* | Project Director, through MOC |

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| **ESS 2: LABOR AND WORKING CONDITIONS** |

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| 2.1 | **LABOR MANAGEMENT PROCEDURES**:  Update, adopt, and thereafter implement, the Labor Management Procedures. | *Throughout Project implementation* | SSU, through MOC |
| 2.2 | **LABOR MANAGEMENT PLAN & RISK ANALYSIS**  Prepare a labor risk analysis.  Prepare, adopt, and thereafter implement, the Labor Management Plan(s). | *Three months post project effectiveness* | Project Director, through MOC |
| 2.3 | **GRIEVANCE MECHANISM FOR PROJECT WORKERS**  Develop, maintain, and operate a grievance mechanism for Project workers. | *Prior to the issuance of the first bidding document and/or procurement order* | Project Director, through MOC |
| 2.3 | **OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES**  Prepare, adopt, and implement occupational, health and safety (OHS) measures along with COVID-19 SOP adaptation. | *Prior to the issuance of the first bidding document and/or procurement order* | Project Director, through MOC and E&S Focal Persons at IAs |
| 2.4 | **EMERGENCY PREPAREDNESS AND RESPONSE**  As part of the OHS measures specified in 2.3, include measures on emergency preparedness and response, including COVID-19 safety measures, and ensure coordination with measures under 4.5. | *Prior to the issuance of the first bidding document and/or procurement order* | Project Director, through MOC |
| 2.5 | **PROJECT WORKERS TRAINING**  Provide training(s) for Project workers to heighten awareness of risks and to mitigate impacts on Project stakeholders. The training(s) would be preceded by the preparation of a capacity/training enhancement plan. | *Prior to the issuance of the first bidding document and/or procurement order and thereafter, annually* | Project Director, through MOC |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** | | | |
| 3.1 | **MANAGEMENT OF WASTE**  Develop, and thereafter implement, the E-Waste Management Plan, consisting of measures and actions to manage electronic waste (e-waste) and include the Good International Industry Practice. The preparation of the E-Waste Management Plan will also entail a detailed review of the “General Auction Policy” in relation to safe disposal. | *Prior to the issuance of the first bidding document and/or procurement order* | Project Director, through MOC |
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|  | **COMMUNITY HEALTH AND SAFETY**  Develop and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, including in relation to Project Workers and any risks of labor influx.  ESA and EWMP will report on relevance of ESS4, and accordingly an instrument will be prepared.  The e-waste management plan (action 1.3) /E&S screening report (action 1.2) will include any necessary mitigation measures related to community health and safety. | Not applicable | Not applicable |
|  | **BIODIVERSITY RISKS AND IMPACTS** | Not applicable | Not applicable |
| 8.1 | **CHANCE FINDS**: Develop and implement a chance finds procedure. | Not applicable | Not applicable |
| 10.1 | **STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION**  Update, adopt, and implement a Stakeholder Engagement Plan (*SEP*). | *Throughout Project implementation* | SSU, through MOC  Project budget |
| 10.2 | **PROJECT GRIEVANCE MECHANISM**  Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP | *Prior to issuance of first bidding document and/or procurement order* | SSU, through MOC |

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| **Capacity Support** | | |
| **Specify Training to be provided** | **Specify Targeted Groups and Timeframe for Delivery** | **Specify Training Completed** |
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| * Stakeholder mapping and engagement * E- waste management protocols * Labor management procedures * Occupational health and safety * Emergency preparedness and response along with COVID-19 considerations * GRM operationalization and management. * Training/Capacity Enhancement Plan | First round of trainings to be completed within first six months of SSU set-up and designation of E&S Focal Points; Annual refresher on each throughout Project implementation | First set of the trainings will be completed after SSU has been set up and staff is in place, and after implementing agencies designate E&S Focal Points, with annual refreshers throughout the Project implementation.  Project budget |