Social Monitoring Report

Semestral Report

July – December 2024

Pakistan: Khyber Pakhtunkhwa Cities Improvement Project

Prepared by Project Management Unit KPCIP for Government of Pakistan and the Asian Development Bank.

**NOTES**

1. The fiscal year (FY) of the Government of the Islamic Republic of Pakistan and its agencies ends on 30 June.
2. In this report “$” refer to US dollars.

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**LIST OF ABBREVIATION**

KPCIP : Khyber Pakhtunkhwa Cities Improvement Project

ADB : Asian Development Bank

SPS : Safeguard Policy Statement

PMU : Project Management Unit

PMCSC : Project Management Construction Supervision Consultants

CIU : City Implementation Unit

WSSC : Water and Sanitation Services Company

MGWSS : Mingora Gravity Water Supply Scheme

GWSS : Gravity Water Supply Scheme

QPR : Quarterly Progress Report

LAR : Land Acquisition and Resettlement

IR : Involuntary Resettlement

DPs : Displace Persons

WBDC : Women Business Development Centre

KP : Khyber Pakhtunkhwa

NDCs : Nationally Determined Contributions

AIIB : Asian Infrastructure Investment Bank

STPs : Sewage Treatment Plants

ISWM : Integrated Solid Waste management

# 

## INTRODUCTION

### Background

1. The Government of Khyber Pakhtunkhwa (Go-KP) obtained financing from the Asian Development Bank (ADB) through the loan number 4160-PAK for Khyber Pakhtunkhwa Cities Improvement Project (KPCIP). The Project involves construction, rehabilitation and up-gradation of water supply, drainage and sanitation, solid waste management, urban livability, smart cities, and green spaces in five cities of Abbottabad, Kohat, Mardan, Mingora and Peshawar of KP. The Asian Infrastructure Investment Bank (AIIB) is a co- financier for the KPCIP project. The Detailed Engineering Design (DED) of the investment packages / subprojects were finalized under the Project Readiness Financing (PRF) phase of KPCIP. Project implementation for the first batch of subprojects has commenced in the fourth quarter of 2022. The Local Government Election & Rural Development Department (LGE&RDD) is the Executing Agency (EA) while respective City Implementing Units (CIUs) within the 05 Water & Sanitation Services Companies (WSSCs) are the Implementing Agencies (IAs).
2. Out of 24 selected subprojects in 15 subprojects there are no LAR impacts while, 9 subprojects involve varying degrees of LAR impacts. Most of the acquired land is barren & uncultivated however, Mingora Greater Gravity Water Supply Scheme (MGWSS) has impact on cultivated land, crops, and fruit/ non-fruit trees. A small portion of cultivable land being affected by the land acquisition for Land Fill Site (LFS) Abbottabad and LFS Peshawar with a minimal number of fruit and non-fruit trees.
3. Based on the livelihoods of the DPs being affected in MGWSS the sub project has been categorized IR category “A” while, in the remaining subprojects the LAR impacts are generally assessed as “insignificant” and categorized as B for IR.
4. The project has not affected livelihood of the DPs except for MGWSS (main transmission line, WTP and approach road to WTP). IR impacts from the rest of the subprojects are generally assessed as “insignificant. The status of sub projects with LAR impacts are given below in **Table ‎1‑1**.

Table 1‑1: Status and Timeline of Sub Projects with and without LAR Impacts

| S# | Subproject | LAR document | Timeline | Updated Status |
| --- | --- | --- | --- | --- |
| 1 | CW-01, Lot-1: Pedestrianization of Market in Old City Centre ABBOTTABAD. | Resettlement Plan (RP) | RP approved by ADB and disclosed on ADB and EA websites. | 99.4% resettlement cost has been disbursed to 97.6% DPs.  The disbursement has been validated by the EMA.  Civil work is in progress at site.  Information from the affected persons have been collected to select the candidates for skill development trainings. |
| 2 | Urban Green Space Initiatives – Sherwan Adventure Family Park, ABBOTTABAD. | N/A | NA | No LAR Impacts  Civil works in progress |
| 3 | CW-01, Lot-2: Urban Green Space Initiatives – Women Business Development & Community Centre and Sports Complex, KOHAT. | Not Applicable | NA | No LAR Impacts  Civil works in progress |
| 4 | CW-01, Lot-3: Urban Green Space Initiatives – Ring Road Green Belt and N-45 national Highway, MARDAN. | Not Applicable | NA | No LAR Impact  De-scoped |
| 5 | CW-01, Lot-4: Urban Green Space Initiatives – Neighborhood Park, MINGORA. | Not Applicable | NA | No LAR Impacts  Civil works in progress |
| 6 | CW-01, Lot-5: Urban Green Space Initiatives – Besai Park Hayatabad and Bagh-e-Naran Park extension, PESHAWAR. | Not Applicable | NA | No LAR Impacts  Civil works in progress |
| 7 | CW-02, Lot-1: Rehabilitation & Upgradation of Water Supply to WTP with SCADA including Rehabilitation & Provision of Water Storage Reservoirs, New Distribution Network & Water Metering System, ABBOTTABAD | Corrective Action Plan (CAP) | CAP approved by ADB and disclosed on ADB and EA websites. | Out of total 16 water tanks NOCs are obtained for 5 situated on state owned land. 6 WTs have been acquired through Private negotiations and compensation has been disbursed to the DPs/owners of these WTs. The remaining 5 WTs are also situated on state land out of which 3 have been relocated and feasibility of the 2 has been prepared for relocation, out of these 2 WTs 1 will be relocated at state land while 1 will be relocated at private land.  The land acquisition on intake structure at Malsa has also been completed. Compensation cheque of the affected land has been given to the DPs. |
| 8 | CW-02, Lot-2: Rehabilitation & Upgradation of Water Supply System connected to the WTP with SCADA including New Water Treatment Plant, ABBOTTABAD. | Corrective Action Plan (CAP) | CAP has been approved by the ADB and disclosed on ADB and EA websites. | The BoR and IVS determined amount has been disbursed to 7 DPs.  The EMA has validated disbursement to 7 number cleared DPs.  The EMA has also verified the escrowed amount of PKR 2.46 million which has been deposited for payment to the remaining DPs engaged in litigation with each other. The disbursement will be resumed after court decision.  The site has been handed over to the contractor. The Civil work on the WTP is ongoing. |
| 9 | CW-02, Lot-3: Improvement of Water Supply System with SCADA including (a) Rehabilitation & Provision of Water Storage Reservoirs (b) New Distribution Network and Water Metering System (c) Energization of Existing Tube Wells, KOHAT. | Not applicable | N/A | No LAR Impacts  Due diligence will be done for any unanticipated impact.  Civil work is ongoing |
| 10 | CW-02, Lot-4: Improvement of Water Supply System with SCADA including (a) Rehabilitation & Provision of Water Storage Reservoirs (b) New Distribution Network and Water Metering System (c) Energization of Existing Tube Wells, PESHAWAR. | Not applicable | N/A | Majority of the land ownership is clear.  However, at OHR Murshid, court stay has been granted to the DPs against their claim of ownership on the OHR’s land. The owner of the OHR Danish Abad has also registered his complaint in project GRC and now it is escalated to the 3rd tier of GRC for amicable resolution. The civil work has been stopped on both the OHRs.  A meeting of 3rd tier GRC will be held on 2nd January 2025 under the chairmanship of special secretary LGE&RDD for resolution of the complaint on OHR Danishabad.  NOCs have been obtained for the OHRs on state land.  Civil work is ongoing. |
| 11 | CW-03, Lot-1: Kotal Township (KDA) Sewerage System including New Sewerage Treatment Plant (STP) and required SCADA System, KOHAT. | Not applicable | N/A | State land with no LAR impacts  Due diligence for any unanticipated impact will be done  Civil work is ongoing. |
| 12 | CW-03, Lot-2: Catchment Area of Rorya STP including New Sewerage Treatment Plant and required SCADA System, MARDAN. | Not applicable | N/A | State land with no LAR impacts  Due diligence for any unanticipated impact will be done.  Civil Work on STP is on going |
| 13 | CW-04, Lot-1: Mingora Greater water supply scheme: Water Treatment Plant (WTP), intake structure and transmission main MINGORA. | LARP | For transmission main and WTP LARP has already been approved by ADB and disclosed on EA and ADB websites.  WSSC Swat has decided to acquire the Land through private negotiations for escape channel, intake weir.  Implementation of LARP for additional land in Charbagh is ongoing. | **WTP:** Both the BoR and IVS determined amount has been disbursed to the DPs of WTP and civil work is ongoing.  **Transmission main Khwazakhela:** Disbursement has been completed to 95.43% DPs of 2.1 km transmission main in Khwazakhela and civil work is ongoing on this strip of land.  **Babuzai OHRs**: Compensation of 23 OHRs situated on private land has been completed to all the owners and civil work is ongoing on 22 WTs. An unanticipated impact was noted on the OHR-2 in Mingora wherein the lessee car wash, motor car parking stand business has been affected.  CAP has been prepared and approved. However, disclosure of the CAP is awaited.  **Charbagh Transmission main**: Based on the BoR disbursement the IVS amount has been disbursed to 960 DPs (62%) in the old alignment.  **Additional Land**: BoR disbursement is 40% in the additional land in Tehsil Charbagh.  **Intake Weir**: Land Acquisition on PN is in progress for intake weir and escape channel. |
| 14 | CW-04, Lot-2: Water Distribution System, Intake Structure and Distribution System and SCADA, OHRs and water tanks including the Approach Road to WTP, MINGORA. | LARP | LARP approved and disclosed on ADB and EA websites | **Approach Road to WTP**: Total 31 (100%) DPs have received the BoR and IVS compensation.  The civil work is ongoing on the approach road to WTP. |
| 15 | CW-05: Procurement, Supply, Installation, commissioning, and operations of Solid waste management system MARDAN | Not Applicable | Not Applicable | The affected land is State land  The surrounding community has raised objections over the construction of LFS near their villages. The community perceives that the LFS will cause disease and stinky.  A court case has been initiated against the WSSCM by the community.  The court has decided the case in favor of the community. The WSSCM has submitted an appeal against the decision of the court and now it has been reopened. Social and environmental specialists are closely working with WSSC for contesting the case. The CIU team is also in close coordination with the community for amicable resolution. Consultations are in progress. |
| 16 | CW-06: Construction of Urban / Green Spaces – Salhad Bagh, ABBOTTABAD | Not Applicable | N/A | State land with no LAR impacts  Due diligence will be undertaking for any unanticipated impact. |
| 17 | CW-07: Lot-1  Procurement, Supply, Installation, commissioning, and operations of Solid waste management system PESHAWAR | CAP | CAP approved by ADB and disclosed on ADB and EA websites. | BOR amount has been disbursed to 152 (86.52%) DPs.  At the time of award, the number of DPs was 170 but by adding 67 successors of the deceased DPs the number has risen to 237.  BOR disbursement to the remaining 85 DPs is in progress.  Out of the total the disbursement of IVS differential amount has been made to 75 DPs. |
| 18 | CW-07: Lot-2  Procurement, Supply, Installation, commissioning, and operations of Solid Waste Management system Kohat | LARP | LARP approved and disclosed on ADB and EA websites | The BoR determined rates of land are at par with the IVS rate.  Till date the BoR has disbursed an amount of PKR. 27,728,518 to 852 DPs. The total due amount against the project affected assets is PKR.128,789,200 to 3695 DPs. |
| 19 | CW-07: Lot-3  Procurement, Supply, Installation, commissioning, and operations of Solid waste management system MINGORA | N/A | N/A | De-scoped |
| 20 | CW-07: Lot-4  Procurement, Supply, Installation, commissioning, and operations of Solid Waste Management system ABBOTABAD | LARP | LARP submitted to ADB for approval | LARP has been submitted to ADB for review. |

### Project Funding

1. EA for the project is LGE&RDD of Government of Khyber Pakhtunkhwa (GoKP). PC-I for KPCIP was approved by ECNEC on 24 November 2021 at a cost of PKR 97,146 million (US$ 637.86 million). The project Financiers are Asian Development Bank (ADB) / Asian Infrastructure Investment Bank (AIIB) / Asian Development Fund (ADF) / Govt. of Khyber Pakhtunkhwa. The Loan agreements with ADB, and AIIB and ADF Grant agreement have signed with the Government of Pakistan (GoP). Both the loan agreements are effective, and the project ending date is June 2026.

### Livelihood Restoration/Skills Development Training

1. According to the Asian Development Bank's (ADB) social safeguard policy, projects must aim to enhance or at least restore the livelihoods of individuals affected by the project to their pre-project conditions. Additionally, the policy emphasizes improving the living standards of impoverished and vulnerable groups. In line with this, a Training Needs Assessment (TNA) was conducted for the sub-project "Pedestrianization of the Old City in Abbottabad," followed by the selection of trainees for skill development in specific trades. A similar process will be implemented for the MGWSS project in Swat. These training programs will be organized in collaboration with various training institutes. Before the commencement of each program, tailored training modules will be developed by the respective institutes to ensure effectiveness and alignment with the identified needs.

### Core Labor Standard (CLS)

1. As per the Asian Development Bank’s (ADB) Social Safeguard Policy Statement, it is mandatory to implement Core Labor Standards (CLS) across all ADB-funded projects. During the reporting period, each Social Safeguard Specialist gathered detailed information on CLS compliance from individual subprojects. The designated focal person within the Project Management Unit (PMU) was responsible for overseeing supervision, management, and training, as well as compiling comprehensive CLS reports. As part of its standard practice, the PMU submits Quarterly Progress Reports (QPRs) on CLS implementation. Additionally, the Social Safeguard Specialists of each City Implementation Unit (CIU) play a pivotal role in ensuring effective oversight of CLS execution. They are supported in this task by the Monitoring and Evaluation (M&E) Officers and Environmental Safeguard Specialists within their respective CIUs. This collaborative framework not only enhances compliance but also ensures a consistent approach to labor standards across all project components, contributing to sustainable and inclusive project outcomes. In response to complaints from employees of the ZKB contractor, ADB has formulated a Corrective Action Plan (CAP) that is now being implemented in Kohat and Peshawar.

### Executive Summary

#### Legal Framework

* Land Acquisition Act 1894 (permanent land acquisition, built-up property, crops, trees etc. through District Land Acquisition Collector’s office)
* ADB’s Safeguard Policy Statement (SPS) 2009 (Implementation, compensations/allowances etc. through PMU with assistance from PMCSC, CIU and WSSC).
* Independent Valuation Study (IVS) for determination of fair market price as per loan agreement and social safeguard policy of ADB.
* **LAR Impacts:** Land, Crops, Trees, Livelihood and Temporary Sheds of shops

#### Overview:

1. The Social Monitoring Report for July to December 2024 focuses on the Khyber Pakhtunkhwa Cities Improvement Project (KPCIP) in Pakistan, funded by the Asian Development Bank (ADB) and Asian Infrastructure Investment Bank (AIIB). The report details progress on social safeguards, including land acquisition, resettlement, livelihood restoration, and adherence to Core Labor Standards (CLS).KPCIP aims to improve urban infrastructure in five cities: Abbottabad, Kohat, Mardan, Mingora, and Peshawar. The project involves constructing and upgrading water supply, drainage, sanitation, solid waste management, and green spaces. Out of 24 subprojects, 15 have no significant land acquisition and resettlement (LAR) impacts, while 9 involve varying degrees of LAR impacts. The purpose of monitoring in KPCIP is to ensure compliance with ADB’s Safeguard Policy Statement (SPS) 2009. Monitoring indicators in the project include the delivery of entitlements, consultations, grievances, participation, budget and timeframe, and livelihood and income restoration. Based on the project impacts LARPs and Corrective Action Plans (CAPs) have been developed for the subprojects. Compensation for land and non-land assets is based on Independent Valuation Studies (IVS) and Board of Revenue (BoR) rates. Disbursement of compensation to Displaced Persons (DPs) is ongoing, with efforts to ensure fair compensation and timely payments.
2. CLS implementation is monitored across all construction sites to ensure fair labor practices. Issues identified include subcontractors' non-compliance with CLS and workers’ lack of awareness about their rights. A Corrective Action Plan (CAP) has been formulated for Kohat and Peshawar to address CLS violations. The project GRM is active at all project sites to handle complaints from affected communities and workers. The report provides details on the status of complaints and resolutions. Recently an e GRM has been developed by the project PMU and GRM related data is being uploaded in the system. The Local Government Election & Rural Development Department (LGE&RDD) is the Executing Agency. City Implementation Units (CIUs) within the Water & Sanitation Services Companies (WSSCs) are the Implementing Agencies. Roles and responsibilities of various stakeholders are defined to ensure compliance with social safeguard covenants. Strengthen CLS monitoring, conduct capacity-building workshops, further strengthen the grievance management system, and foster collaboration among stakeholders. The report emphasizes the importance of continuous monitoring, capacity building, and compliance with ADB policies to mitigate social impacts and ensure the project's success.

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## MONITORING METHODOLOGY

### Purpose of Monitoring

1. The ADB’s Safeguard Policy Statement (SPS) 2009 with regard to involuntary resettlement aims to “avoid Involuntary Resettlement (IR) wherever possible or to minimize impacts if avoidance is not possible by exploring project and design alternatives; enhance or at least restore livelihoods of those affected by the Project relative to pre-project levels and to improve the standards of living of those poor and others vulnerable groups. Following this aim of the SPS, the KPCIP has been carefully conceptualized either to avoid all potential social impacts of proposed subprojects where possible or keep impacts to insignificant thresholds by adopting no or least impacts subproject designs. The social safeguard team of PMU undertook due diligence of the proposed subprojects to assess the land acquisition and resettlement (LAR) impacts of the subprojects, screened all the subprojects, and categorized them under the SPS projects categorization criterion for involuntary resettlement (IR) and Indigenous Peoples (IP) impacts, prepared Land Acquisition and Resettlement Plans (LARPs) and Corrective Action Plans (CAPs) as required to compensate and assist all displaced persons (DPs) prior to the commencement of civil works.
2. KPCIP has developed a Project Performance Monitoring System (PPMS) in accordance with ADB guidelines to monitor progress of the project against the planned outcome and outputs of DMF. The PPMS is being updated periodically. The PPMS covers physical and financial progress, safeguards, environment and gender, loan covenants compliance, and other agreed action items. In this regard ADB mission visited KPCIP subprojects and had detailed discussion with the stakeholders, particularly WSSCs, PMU, CIUs and Project Management & Construction Supervision Consultant (PMCSC). To ensure monitoring of KPCIP sub project the social safeguard team in PMU regularly been submitting SASSMR and MPR within 15 days after the end of due date.

### Monitoring Indicators

1. Following are the key Monitoring & Evaluation Indicators that guide the monitoring process.

Table 2‑1: Monitoring Indicators

|  |  |
| --- | --- |
| Delivery of Entitlements | * Entitlements disbursed, compared with number and category of losses set out in the entitlement matrix. * Disbursements against timelines. * Allowances, according to schedule. * Restoration of social infrastructure and services. * Progress on income and livelihood restoration activities being implemented as set out in the livelihood restoration plan, for example, commencement of production, the number of the displaced persons trained in employment with jobs, microcredit disbursed, number of income- generating activities assisted. Affected businesses receiving entitlements, including transfer and payments for net loss resulting from lost business and the relocated DPs were helped out in their efforts for resettlement. |
| Consultations and Grievances | * Have consultations taken place as scheduled including meetings, groups, and community activities? Has resettlement information been prepared and distributed? * How many displaced persons know their entitlements? How many are aware if their entitlements have been received? |
| GRM | * Have any of displaced persons used the grievance redress procedure? What were the outcomes? * Have grievances been resolved? * Was the social preparation phase implanted? |
| Participation | * Number of general meetings (for both men and women) * Percentage of women out of total participants * Number of meetings exclusively with women * Number of meetings exclusively with vulnerable groups * Number of meetings at new sites * Level of participation in meetings (of women, men and vulnerable groups) |
| Budget and Timeframe | * Have all land acquisition and resettlement staff been appointed and mobilized on schedule for the field and office work? * Has capacity building and training activities been completed on schedule? * Are resettlement implementation activities being achieved against the agreed implementation plan? * Are funds for resettlement being allocated to resettlement agencies on time? * Have resettlement offices received the scheduled funds? * Have funds been disbursed according to the resettlement plan? * Has the social preparation phase taken place as scheduled? * Has all land been acquired and occupied in time for implementation? |
| Livelihood and Income Restoration | * No. of displaced persons under the rehabilitation programs (women, men, and vulnerable groups) * No. of displaced persons who received vocational training (women, men, and vulnerable groups) * Types of training and number of participants in each * No. and % of displaced persons covered under livelihood programs (women, men, and vulnerable groups) * No. of displaced persons who have restored their income and livelihood patterns (women, men and vulnerable groups) * No. of new employment activities * Extent of participation in rehabilitation programs * Extent of participation in vocational training programs * Degree of satisfaction with support received for livelihood programs * % of successful enterprises breaking even (women, men and vulnerable groups) * % of displaced persons who improved their income (women, men and vulnerable groups) * % of displaced persons who improved their standard of living (women, men and vulnerable groups) * No. of displaced persons with replacement agriculture land (women, men and vulnerable groups) * Quantity of land owned/contracted by displaced persons (women, men and vulnerable groups) * No. of households with agricultural equipment * No. of households with livestock |

### Semestral Progress Report

1. Continuous and periodic monitoring and evaluation of both the processes and outcomes allowed KPCIP to determine whether the entitlements and actions specified under the LARP/RP were implemented as required. This also ensured that the livelihoods and living standards of the DPs were either maintained or improved. If any issues were identified, corrective measures were promptly taken to meet the goals and objectives outlined in the LARP/RP/CAP. Furthermore, adherence to Core Labor Standards (CLS) is a critical aspect of ADB safeguard compliance. To ensure compliance, the project regularly monitors the implementation of CLS at all active construction sites.
2. Submission of the Semi-Annual Social Monitoring Report (SASMR) is mandatory for the PMU. This enables both the donor and borrower to take timely and appropriate action on any instances of non-compliance with ADB safeguard policies. The report allows the external monitor to validate the implementation of LAR documents and the disbursement of funds as determined by the BoR and IVS. ADB approval of the external monitoring report is a prerequisite for site clearance and the commencement of civil works. Additionally, the report includes an assessment of compliance with ADB’s Core Labor Standards. To address non-compliance issues, a Corrective Action Plan (CAP) has been developed by ADB for Kohat and Peshawar to ensure CLS implementation and maintain follow-up on identified issues.

# 

## LARPs/ RP/ CAPs, PREPARATION AND IMPLEMENTATION

### PREPARATION OF LARP

1. **Land Acquisition and Resettlement Plan (LARP) for Additional Land in Charbagh-MGWSS, Swat:** During the reporting period, the LARP for the additional land in Charbagh was prepared and is now being implemented. The preparation of the LARP for the additional land required for the Charbagh-MGWSS (Transmission Main) considered the following project readiness factors:
2. **Key Readiness Factors:**

(i) Issuance of Section-11 notification (dated 10 July 2024) and identification of actual landowners and affected land parcels.

(ii) Inclusion of findings from the Independent Valuation Study (IVS), which determined the rates for affected assets based on the ADB Safeguard Policy Statement (SPS) criterion of full replacement costs, accounting for any price differentials identified by the IVS.

(iii) Completion of the final census of Displaced Persons (DPs).

(iv) Compilation of the final inventory of losses.

(v) Development of the final entitlement matrix detailing impacts, entitlements, compensation, and allowances.

1. The LARP for the additional land (21 Kanals and 18.16 Marlas) in Tehsil Charbagh is comprising of replacement costs as determined by the IVS for both land and non-land assets. A Mouza-wise summary of the DPs/landowners is provided in **Table 3-1**, while the Mouza-wise location of the affected land is detailed in **Table 3-2** below.

Table 3‑1: Table-1: Mouza Wise Summary of DPs/Land Owners

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Status of DP** | **Name of Mouza** | | | | **Total** |
| **Dakorak** | **Gullibagh** | **Alam Ganj** | **Charbagh** |
| Available DPs | 125 | 103 | 82 | 75 | 385 |
| Not available DPs | 87 | 31 | 118 | 17 | 253 |
| Refused Cases | 13 | 6 | 21 | 18 | 58 |
| Deceased DPs | 21 | 19 | 24 | 13 | 77 |
| **Total** | **246** | **159** | **245** | **123** | **773** |

Table 3‑2: Mouza wise land location

| **Mouza / Area** | **Affected land** | |
| --- | --- | --- |
| **Kanals** | **Marla** |
| Mouza Charbagh, Tehsil Charbagh, District Swat | 4 | 9.75 |
| Mouza Alamjang, Tehsil Charbagh, District Swat | 6 | 2.32 |
| Mouza Gulibagh, Tehsil Charbagh, District Swat | 5 | 19.17 |
| Mouza Dakorak, Tehsil Charbagh, District Swat | 5 | 6.92 |
| **Total Affected Land** | **20** | **38.16** |
| **(21 Kanals 18.16 Marla)**  **(21.90 Kanals)** | |
| **(2.74 Acre)** | |

### Independent Valuation Study (IVS) of LFS Abbottabad and Additional Land Acquisition in Tehsil Charbagh

1. The Independent Valuation Study (IVS) was carried out by Anderson Consulting, an independent appraiser accredited by the State Bank, to evaluate the affected land in LFS Abbottabad and the additional land and non-land assets in Charbagh, Swat. The additional land in Tehsil Charbagh measures 21 Kanals and 18.16 Marlas (2.74 acres). For Abbottabad, the IVS was revised at the intimation of the Asian Development Bank (ADB) due to the expiration of the stipulated one-year validity period. The IVS findings have been incorporated into the revised Land Acquisition and Resettlement Plan (LARP) for LFS Abbottabad, which has been submitted to ADB for review. The primary objective of the IVS was to independently assess the value of affected land and non-land assets to ensure fair market rates. This was achieved by sampling 10% of affected land plots or at least 8 plots of various land types. According to the ADB's Safeguard Policy Statement (ADB-SPS), the highest valuation between the Board of Revenue (BoR) rates and the IVS rates will be adopted for compensation to the DPs.

### Resettlement Budget:

1. The total resettlement budget has been prepared based on the land and non-land asset rates determined by the Land Acquisition Collector (LAC) and the replacement costs calculated by the IVS Consultant using current market rates for 2023-2024. Vulnerability and severity allowances were derived from socio-economic and census data directly collected from Displaced Persons (DPs) and aligned with the entitlement matrix provided in the LARP.
2. **Approval of the Resettlement Budget:** All details of the resettlement budget under the final LARP for Charbagh have been documented and disclosed on the ADB and Executing Agency (EA) websites. The revised LARP for LFS Abbottabad is currently under review by ADB.
3. **Good faith Efforts for disbursement:** To ensure 100% disbursement to DPs, extensive good-faith efforts are ongoing. These efforts include:

* Personal contact with DPs.
* Announcements via mosque loudspeakers.
* Display of notices on prominent locations, such as BoR notice boards and Assistant Commissioner Offices.
* Installation of banners in community areas.

1. **Unpaid Disbursements:** Disbursements could not be made in some cases due to reasons such as minors as heirs, absentee beneficiaries, pending mutations, or trivial amounts involved. The undisbursed amounts for such cases will be deposited into a dedicated ESCROW account.

### DISTBURSEMENT SUMMARY OF BoR AND IVS COMPENSATION

1. During the reporting period the following BoR and IVS disbursement were made to the owners of land and non-land assets.
2. **Babuzai-MGWSS (Transmission main):** In Babuzai there are a total of 281 DP’s out of which 29 DP’s fall in vulnerability. Vulnerability allowance has been received by 28 DPS which is (99%) of the total DPs. 236 DP’s (83.99%) have received BoR land and non-land compensation. 234 DP’s (83.27%) have received their IVS compensation.
3. In the reporting period as shown in the table below, in Babuzai 2 DP’s have received their BoR and IVS Land and non-Land compensation attached as **Annexure 4 of Volume 2**.

Table 3‑3: Summary Table (Sangota Babuzai-MGWSS**)**

| **Category** | **No of DPs** | **Total Amount** | **No of Paid DPs** | **Total Paid Amount** |
| --- | --- | --- | --- | --- |
| BOR | 2 | 1,370,170 | 2 | 1,370,170 |
| IVS | 2 | 256,723 | 2 | **256,723** |
| **Total** |  |  |  | **1,626,893** |

1. **Charbagh-MGWSS (Transmission main):** In Charbagh there are total 1552 DPs out of which 108 DPs are eligible for vulnerability allowance. 58 (53.7%) DPs have received vulnerability allowance. 960 (61.86%) DP’s have received BoR land and non-land compensation. While 618 DPs received IVS determined compensation of their affected assets. Land compensation attached as **Annexure 5 of Volume 2**

During the reporting period as shown below in **table 3-4** 568 DPs received their BoR compensation of land and non-land assets. 41 vulnerable DPs received their vulnerability allowance. 438 have received their IVS compensation. 100 DPs were not available at site while 30 DPs refused to receive their IVS compensation due to minimal amounts.

Table 3‑4: Summary Table (Charbagh-MGWSS)

| **Category** | **DPs** | **Budget** | **Paid DPs** | **Paid Amount** |
| --- | --- | --- | --- | --- |
| BOR | 568 | 113,821,671 | 568 | 113,821,671 |
| IVS | 568 | 26856,311 | 438 | 23,112,743 |
| Severity and Vulnerability Allowance | 46 | 3,450,000 | 41 | 3,075,000 |

1. **OHR/ WATER TANKS-MGWSS (Mingora):** In MGWSS there are 23 OHRs and Surface Water Tanks owned by 34 DPs. All 34 (100%) DPs have received their compensation amount.
2. In the reporting period 1 DP of OHR-1 received his due compensation i.e. PKR.-8,166,000. Land compensation attached as **Annexure 6 of Volume 2**. All of the above mentioned OHRs have been acquired through private negotiations.

Table 3‑5: Summary Table (OHR-MGWSS)

| **Summary Table** | | | | | | |
| --- | --- | --- | --- | --- | --- | --- |
| **Category** | **DPs** | **Budget** | **Paid DPs** | **Paid %** | **Paid Amount** | **Paid %age** |
| BOR | 34 | **203,409,150** | 34 | 100% | 203,409,150 | 100% |

1. **Choona Water Treatment Plant - Abbottabad:** In Choona there are a total of 148 DP’s out of which 07 DPs (4.7%) have received their BoR compensation. There are 67 DPs who fall in vulnerability out of which 2 (2.9%) have received vulnerability allowance. There is land ownership dispute amongst the DPs and they have approached the civil court for resolution of their issue. The amount has been deposited in the ESCROW account and will be released to the DPs in light of the court’s verdict. The figures of paid amount are shown below in **table 3-7**;

Table 3‑7: Summary Table: Choona Water treatment Plant-Abbottabad

| **Category** | **DPs** | **Budget** | **Paid DPs** | **Paid %** | **Paid Amount** | **Paid %age** |
| --- | --- | --- | --- | --- | --- | --- |
| BOR | 148 | 1,755,919 | 7 | 4.73% | 790,803 | 45.04% |
| IVS | 148 | 24,571,355 | 7 | 4.73% | 2,375,076 | 9.67% |
| Severity and Vulnerability Allowance | 67 | 4,422,000 | 2 | 2.99% | 132,000 | 2.99% |

1. **BOR disbursement in LFS Abbottabad:** The disbursement of BoR determined amount is in progress to the DPs of Land Fill Site Abbottabad. The social safeguard and BoR team in their joint efforts are convincing the DPs for early receiving of the due amount. Till the reporting period an amount of PKR. 92,094,227 has been disbursed to 175 DPs while an amount of PKR. 28,926,662 is pending due to multiple reasons. An amount of PKR. 49,549,111 could not be disbursed due to litigation of DPs over the ownership of land and mistakes in the BoR record (Khata Ghalat). However, the parties have approached the civil court for resolution of their issue. The details of previously disbursed amount is given below in **table 3-8.**

Table 3‑8: Status of BoR Disbursement in LFS Abbottabad (as Per Revenue Record)

|  |  |  |  |
| --- | --- | --- | --- |
| **Sr. No.** | **Description** | **DPs** | **Amount (PKR)** |
| 1 | Amount Disbursed | 175 | 92,094,227 |
| 2 | Pending Amount | 223 | 28,926,662 |
| 3 | DPs In Litigation | 88 | 49,549,111 |
| 4 | Khata Ghalat | 65 |
| Total | | 551 | 170,570,000 |

1. **Disbursement status of water tanks-Abbottabad:** In Abbottabad out of total 16 water tanks 5 are situated on the state-owned land and the civil work is has been started on these 5 water tanks after receiving NOCs from the concerned departments. Agreements have been finalized with the land owners of 6 water tanks situated on private land through negotiated settlement and they have been compensated against their affected land. The remaining 5 water tanks are also situated on the state land and need relocation. Out of these 5 water tanks 4 have been relocated on the nearby state land while 1 will be shifted to private land. Disbursement status on these water tanks is given below in table 3-9 Details of BOR Disbursement Attached as **Annexure 7 of Volume 2**.

Table 3‑9: Compensation Details for Negotiated Settlements at Four Locations, Water Supply Scheme-Abbottabad

| **Proposed facility/ Location** | **Owner's Name** | **Compensation Amount** | **Payment status** |
| --- | --- | --- | --- |
| Tank-4 & 12 | Tipu Khan Jadoon & Muhammad Bilal Khan Jadoon | 3,120,000 | Paid |
| Tank-1 | Abdul Razaq S/O Ali Bahadur Khan | 120,000 | Paid |
| Tank-1 | Amad Khan S/O Ali Bahadur Khan | 120,000 | Paid |
| Tank-1 | Aman Ullah Khan S/O Ali Bahadur Khan | 120,000 | Paid |
| Tank-1 | Arif Khan S/O Ali Bahadur Khan | 120,000 | Paid |
| Tank-1 | Haroon Khan S/O Ali Bahadur Khan | 120,000 | Paid |
| Tank-1 | Saeed Ullah Khan S/O Shadi Khan | 120,000 | Paid |
| Tank-1 | Sharif Khan S/O Shadi Khan | 120,000 | Paid |
| Tank-1 | Shahzad Gul S/O Shadi Khan | 120,000 | Paid |
| Tank-1 | Wajid Khan S/O Shadi Khan | 120,000 | Paid |
| Tank-1 | Waqas Ali Khan S/O Shadi Khan | 120,000 | Paid |
| Tank-1 | Zar Gul Khan S/O Shadi Khan | 120,000 | Paid |
| Tank-1 | Asad Ali Khan S/O Wali Muhammad Khan | 360,000 | Paid |
| Tank-1 | Yasir Ali Khan S/O Wali Muhammad Khan | 360,000 | Paid |
| Tank-1 | Faiq Khan S/O Waris Khan | 120,000 | Paid |

1. **Landfill Site Peshawar:** BoR determined an amount of PKR 151,232,857 for 238 DPs. Out of the total BoR determined compensation an amount of PKR 135,098,601 (89.78%) has been disbursed to 152 DPs (63.86%). The PMU based on the BoR received vouchers has initiated disbursement of IVS determined differential amount. IVS has determined an amount of PKR. 48900000 for the total 238 DPs. Out of the total an amount of PKR 8000000/- has been disbursed to the 75 DPs.
2. **Landfill site Kohat:** The LAC has determined a total amount of PKR. 128,789,200 which will be disbursed to 3695 DPs in LFS Kohat. The disbursement of BoR determined amount has been initiated by the revenue department. The BoR determined rates of land are at par with the rate determined by the IVS consultant. Till the end of December 2024, the BoR has disbursed an amount of PKR. 27,728,518 to 852 (23%) DPs.
3. **OHRs/tube wells in Kohat:** out of total 25 overhead water tanks, sum tanks, surface reservoirs 20 are situated on state owned land for which NOCs have been obtained while 5 are situated on private land. After successful negotiations the owners of the land of 5 new tube wells/OHRs are agreed to provide the land for the tube wells free of cost.
4. **Pedestrianizing Abbottabad:** Resettlement cost has been disbursed to the DPs. The disbursement has been validated by the EMA. Civil work is ongoing at site.
5. **OHRs Peshawar:** Out of 23 sites for rehabilitation and construction of OHRs, 8 OHrs were dismantled and civil work initiated on it. One DP of (OHR Danish Abad) has registered complaint in GRC for compensation of the affected land claiming ownership of the affected land. Several meetings have been conducted on the issue in tier-1 and 2 of the GRC and now the complaint has been escalated to tier-3 for amicable resolution of the issue. Another DP in OHR Murshid Abad has registered a court case for compensation of the affected land which is still ongoing. Under the green urban spaces’ initiative, the civil work on Besai Park Hayatabad and Bagh-e-Naran Park is in progress. The affected land is state owned land having no LAR impacts.
6. **LFS Mardan:** The land of LFS Mardan is state owned land so there are no LAR impacts. The surrounding community in the nearby villages have raised concern over the construction of LFS near to their villages. The community perceive that the LFS will cause disease and stinking. The community has won the court case against the WSSCM. The WSSCM has registered an appeal in the civil court for review of the court decision in the greater national interest. The case has been reopened for hearing and WSSCM is now actively pursuing the case. The project staff engaged the local community to get their consensus and support to withdraw their application in favor of the project.
7. **Sewage Treatment Plant (STP) Mardan**: The land of the STP is state land with no LAR impacts. Due diligence for any unanticipated impact will be done as per SPS 2009. Civil work is ongoing at site.
8. Details of disbursement to individual DPs is attached in Annexure 4 to 8 **-Volume-2** of this Report.

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## IR Impacts from KPCIP Sub-projects

1. Out of 24 subprojects, 15 subprojects were assessed having no LAR impacts and were categorized C for involuntary resettlement (IR). These subprojects located on the government- owned land where no user found to be affected by these projects. For such subprojects, the actions are focused on obtaining No-Objection Certificates (NOCs) for the ROWs from the relevant agencies/Departments which manages the sites to be used for the subproject. PMU/CIUs will do another due diligence during implementation in case unanticipated IR impacts occur. The 15 subprojects with no IR impacts include:
2. Shimla Hill urban forest (Green Urban Spaces), Abbottabad
3. Rehabilitation of solid waste dump and conversion into park, Abbottabad
4. New sewage treatment plant (STP), Kohat
5. Women development and community center, Kohat
6. Green initiatives in sports complex (Green Urban Spaces), Kohat
7. Integrated solid waste management system including landfill, Mardan
8. Operationalization and upgrading sewage treatment plant (STP), Mardan
9. Ring Road Plantation (Green Urban Spaces), Mardan
10. Ghulam Nabi Park adjacent to railway line (Green Project), Mardan
11. Ladies Park adjacent to Railway Park (green Project), Mardan
12. Green initiatives at N-45 (Green project), Mardan
13. Development of neighborhood park on the old slaughter house (Green Urban Spaces), Mingora
14. Development of Besai Park in Phase VII (Green Urban Spaces, Peshawar
15. Development of Bagh-e-Naran Extension (Green Urban Spaces), Peshawar
16. Water supply system improvements in the city, Peshawar
17. The remaining 9 subprojects involve varying degrees of LAR impacts. Most of the acquired land is barren & uncultivated however, in MGWSS the affected land is cultivated and also having effects on crops, fruit and non-fruit trees. Thus, the livelihood of majority of the DPs being affected. IR impacts in the remaining subprojects were generally assessed as “insignificant” however, in LFS Abbottabad and Peshawar a small piece of cultivable land with a few fruit and non-fruit trees has been reported. Bulk of the 215.237 acres of land is being acquired for these subprojects which is mostly barren/unproductive. None of the DPs being physically displaced from housing. Except for one DP who is losing all his land, majority of the DPs are losing barren/unproductive land and hence proposed to be category B for Involuntary Resettlement. However, in MGWSS 18 DPs are losing 10% or more of their agricultural land. Based on the socio-economic and census data collected from DPs total 237 DPs declared as vulnerable in the MGWSS and thus categorized as A for IR.
18. There are 3 subprojects one each in Abbottabad, Mingora and Kohat where private land for overhead reservoirs, surface water tanks and tube wells being acquired through negotiated settlement.

### Status of NOCs

1. Field investigation confirms that 15 of 24 subprojects do not have any land acquisition and resettlement (LAR) impacts and are therefore considered as IR category C. These 15 subprojects do not have any IR impacts as they are installed on government owned land and there are no third party or informal users who is being affected. The WATSAN Specialist of KPCIP confirmed that No-objection certificates (NOCs) for all sub projects have been obtained from the relevant departments while 1 sub project has been de-scoped. In Swat for OHR NOC was needed from mines and minerals department, which was verbally granted by the Director General Mines and Mineral in a meeting chaired by the Secretary LGE&RDD. Status of NOCs is provided below inTable 4‑1

Table 4‑1: Status of NOCs in KPCIP Sub-Projects

| **S#** | **Scheme** | **NOC's Obtained** | **NOCs in Process** |
| --- | --- | --- | --- |
| **1.** | CW-01, Lot-1: Pedestrianization of Market in Old City Centre & Urban Green Space Initiatives – Sherwan Adventure Family Park, ABBOTTABAD. | **A. Pedestrianization**   * NOC from TMA, (Obtained)   **B. Sherwan Park:**   * NOC obtained from TMA | 1. **Pedestrianization**  * NOC from PESCO for installation of Meters and Transformers obtained |
| **2.** | CW-01, Lot-2: Urban Green Space Initiatives – Women’s Business Development & Community Centre and Sports Complex, KOHAT. | * Regional Sports Office Kohat. * Tehsil Municipal Administration (TMA) * District Administration Kohat | N/A |
| **3.** | CW-01, Lot-3: Urban Green Space Initiatives – Ring Road Green Belt and N-45 national Highway, MARDAN. | * Descoped and principally agreed with ADB to be terminated | N/A |
| **4.** | CW-01, Lot-4: Urban Green Space Initiatives – Neighborhood Park, MINGORA. | * NOC obtained from the Sports department | N/A |
| **5.** | CW-01, Lot-5: Urban Green Space Initiatives – Besai Park Hayatabad and Bagh-e-Naran  Park extension, PESHAWAR. | * PDA * Payment made to PESCO/TESCO for Pole Shifting | N/A |
| **6.** | CW-02, Lot-1: Rehabilitation & Upgradation of Water Supply to WTP with SCADA including Rehabilitation & Provision of Water Storage Reservoirs, New Distribution Network & Water Metering System, Intake Structure I/c Transmission Main & Associated Structures,  ABBOTTABAD. | * Mines & Minerals Department * Galiat Development Authority * EPA * TMA | * NHA (payment has been made to NHA) work permission is granted. * MOU has been signed with C&W for all 5 cities. * OHRs total required NOCs are obtained.. |
| **7.** | CW-02, Lot-2: Rehabilitation & Upgrade of Water Supply System connected to the WTP with SCADA including New Water Treatment Plant,  ABBOTTABAD. | NA | NA |
| **8.** | CW-02, Lot-3: Improvement of Water Supply System with SCADA including (a) Rehabilitation & Provision of Water Storage Reservoirs (b) New Distribution Network and Water Metering System (c)  Energization of Existing Tube Wells, KOHAT. | * Tehsil Municipal * Administration (TMA) * Education department | * C&W MOU has been signed for all 5 cities. * NHA work permission has been granted. * The remaining NOCs will be obtained as per site requirements. |
| **9.** | CW-02, Lot-4: Improvement of Water Supply System with SCADA including (a) Rehabilitation & Provision of  Water Storage Reservoirs (b) New Distribution Network and Water Metering System (c) Energization of Existing Tube Wells, PESHAWAR. | * Tehsil Municipal * Administration (TMA) through WSSP NOC obtained | * To be obtained during implementation as per site requirements. * C&W MOU has been signed for all 5 cities. |
| **10.** | CW-03, Lot-1: Kotal Township (KDA) Sewerage System including New Sewerage Treatment Plant (STP) and required SCADA System,  KOHAT. | * KDA (obtained) * EPA obtained | N/A |
| **11.** | CW-03, Lot-2: Catchment Area of Rorya STP including New Sewerage Treatment Plant and required SCADA System,  MARDAN. | * WSSC-Mardan * EPA obtained * NOC obtained from Irrigation Deptt. | N/A |
| **12.** | CW-04, Lot-1: Greater water supply scheme: Water Treatment Plant (WTP) MINGORA. | EPA | N/A |
| **13.** | CW-04, Lot-2: Water Distribution System, Intake Structure and & Distribution System and SCADA, MINGORA. | * Tehsil Municipal Administration (TMA) * Irrigation Dept. KP. * EPA * TMA * Payment made to SNGPLS/PESCO for Pole Shifting | * NHA for road crossings and laying of lines (payment has been made to NHA) permission for civil work granted. * C&W Mou has been signed for all 5 cities. * SNGPL will be obtained according to site requirements. * PESCO (for 3,4 and 5 To be obtained during execution as per site requirements) * TMA NOC obtained |
| **14** | CW-07:  Procurement, Supply,  Installation,  Commissioning, and  Operations of Solid  Waste Management  System:  Lot 1: Peshawar | * EPA   (NOC obtained) | N/A |

1. **Sub Projects with LAR Impacts, IR and IP category**: The remaining 9 subprojects involve varying degrees of LAR impacts. Most of the acquired land is barren & uncultivated and livelihood of the majority DPs is not affected. IR impacts from these subprojects are generally assessed as “insignificant except for MGWSS Swat where, 237 DPs are vulnerable and 18 are under the severe impact which alleviated this sub project to IR category A. The IR categorization status of the sub projects of KPCIP is given below in **Table 4‑2**
2. According to the principles set out by the ADB-SPS for IP safeguards the PMU screened early to determine whether Indigenous Peoples are present in, or have collective attachment to, the project area. During these investigations no Indigenous People were found within the areas affected by the sub projects.

Table 4‑2: Sub Projects with IR category

| **S#** | **City** | **Project** | **IR** |
| --- | --- | --- | --- |
| 1 | Abbottabad | New surface water treatment plant (WTP) and intake  structure at Chuna water treatment plant | B |
| 2 | Abbottabad | 1. Rehabilitation and upgradation of water supply system connected to WTP. 2. Rehabilitation or provision of water storage reservoirs 3. New distribution network and water metering   System | C |
| 3 | Abbottabad | Integrated Solid Waste Management System | B |
| 4 | Abbottabad | Pedestrianizing of the old city commercial area | B |
| 5 | Abbottabad | Development of Sherwan Hill Park | C |
| 6 | Abbottabad | Rehabilitation of solid waste dump and conversion into Park | C |
| 7 | Mardan | Integrated solid waste management system and landfill | C |
| 8 | Mardan | Operationalization and upgrading of sewage treatment plant (STP) | C |
| 9 | Mardan | Ring Road plantation (Green project) | C |
| 10 | Mardan | Ghulam Nabi Park adjacent to Railway line (Green Project) | C |
| 11 | Mardan | Ladies Park Adjacent to Railway Park (green Project) | C |
| 12 | Mardan | Green initiatives at N-45 (Green project) | C |
| 13 | Kohat | New STP at KDA | C |
| 14 | Kohat | Water Supply improvements in Kohat City   1. Rehabilitation and Provision of water storage reservoirs 2. New distribution network & metering system 3. Solarization of existing tube wells | C |
| 15 | Kohat | Solid Waste Management System | B |
| 16 | Kohat | Women business Development & Community Centre | C |
| 17 | Kohat | Green initiatives in sports complex (Green Project) | C |
| 18 | Mingora | Mingora Greater water supply scheme including new water treatment plant (WTP) intake structure, transmission and distribution network | A |
| 19 | Mingora | Integrated solid waste management and landfill  a- Land Fill Site Access Route | B |
| 20 | Mingora | Development of neighborhood park on the old slaughterhouse (Green Urban Spaces) | C |
| 21 | Peshawar | Water supply system improvements in the city   1. rehabilitation or provision of water storage reservoirs 2. New distribution network and water metering system | C |
| 22 | Peshawar | Integrated solid waste management and landfill | B |
| 23 | Peshawar | Development of Besai Park in Phase VII (Green Urban Spaces | C |
| 24 | Peshawar | Development of Bagh-e-Naran Extension (Green Urban) | C |

# 

### Implementation of ADB Core Labor Standards (ADB-CLS) in KPCIP Construction Sites

1. **Overview**

This chapter outlines the implementation status of ADB’s Core Labor Standards (CLS) across all KPCIP subprojects, highlighting efforts to safeguard workers' rights and promote decent work. Labor standards encompass fundamental rules ensuring fair treatment of workers in their work environments.

1. **Implementation Status**

The current status of CLS at all active construction sites is detailed in this report and will be monitored until project completion. During oversight, CIU focal persons identified risks related to subcontractors' labor practices and their potential impact on workers. These risks primarily stem from subcontractors’ lack of awareness about ADB-CLS, resulting in unintentional violations.

1. Subcontractors generally lack independent HR policies, often relying on those of the main contractors. While lead contractors have been requested to share their HR policies for corrective actions, only Jalal Hakeem Khan and Sons Engineering & Construction Company has complied, though the policy has not been communicated to workers. Daily-wage laborers employed by subcontractors are unaware of their wages, although free meals and accommodations are provided by contractors.
2. **Core Labor Standards**

ADB-CLS encompasses four fundamental principles to ensure workers' rights and protections:

1. Freedom of association and effective collective bargaining.
2. Elimination of all forms of forced or compulsory labor.
3. Abolition of child labor.
4. Elimination of workplace discrimination.

**51. Progress of Civil Works in KPCIP**

| **Sr #** | **Lot No** | **Sub-Project** | **Start Date** | **Completion Date** | **Progress % as of December 2024** | |
| --- | --- | --- | --- | --- | --- | --- |
| **Achieved** | **Planned** |
|  | CW-01, Lot-1 | Pedestrianization of Old City Market & Urban Green Space Initiatives – Sherwan Adventure Family Park, Abbottabad | October 27, 2022 | April 19, 2024 | 49.5 | 60.47 |
|  | CW-01, Lot-2 | Urban Green Space Initiatives – Women’s Business Development & Community Centre and Sports Complex, Kohat | October 27, 2022 | October 27, 2023 | 70.31 | 100 |
|  | CW-01, Lot-4 | Urban Green Space Initiatives – Neighborhood Park, Mingora | November 8, 2022 | March 30, 2024 | 98.89 | 100 |
|  | CW-01, Lot-5 | Urban Green Space Initiatives – Besai Park, Hayatabad & Bagh-e-Naran Park Extension, Peshawar | October 27, 2022 | April 19, 2024 | 81.06 | 100 |
|  | CW-02, Lot-1 | Rehabilitation & Upgradation of Water Supply Systems with SCADA – Abbottabad | December 4, 2023 | December 3, 2026 | 11.63 | 13.20 |
|  | CW-02, Lot-2 | Upgrade of Water Supply System with SCADA – Abbottabad | July 7, 2023 | August 4, 2026 | 27.9 | 29.47 |
|  | CW-02, Lot-3 | Water Supply System Improvements with SCADA – Kohat | January 31, 2023 | July 19, 2025 | 28.91 | 70.34 |
|  | CW-02, Lot-4 | Water Supply System Improvements with SCADA – Peshawar | January 31, 2023 | January 30, 2025 | 32.72 | 97.3 |
|  | CW-03, Lot-1 | Kotal Township Sewerage System – Kohat | January 31, 2023 | January 30, 2026 | 40.58 | 45.48 |
|  | CW-03, Lot-2 | Rorya STP Sewerage System – Mardan | December 22, 2022 | November 3, 2025 | 47.92 | 50.9 |
|  | CW-03, Lot-2 | Rorya STP Sewerage System – Mardan (Contract Phase) | Contract Signing date; December 28, 2023 | 36 months |  |  |
|  | CW-04, Lot-2 | Water Distribution and SCADA System – Mingora | January 31, 2023 | January 30, 2026 | 45.84 | 47.18 |

**5.2 Implementation Arrangements for CLS**

**5.2.1 Project Management Structure**

A dedicated Project Management Unit (PMU) has been established under the Executing Agency (EA) to oversee activities related to the ADB-Core Labor Standards (CLS) through its City Implementation Units (CIUs) in five cities. The EA is responsible for ensuring full compliance with all covenants outlined in the loan and grant agreements, including the effective implementation of ADB-CLS for staff under the Khyber Pakhtunkhwa Cities Improvement Project (KPCIP). The primary responsibility for compliance with these covenants across all subprojects is shared by the EA and Implementing Agencies (IAs). Pakistan’s labor regulations further demonstrate the country's commitment to implementing CLS. Following ADB directives, KPCIP ensures adherence to CLS at all active construction sites.

**5.2.2 Focal Points and Support**

To prioritize CLS compliance, KPCIP has appointed focal persons at the PMU and each of the five CIUs. These focal points, supported by Environmental Safeguard Specialists, M&E Officers, the Project Management and Construction Supervision Consultants (PMCSC), and contractor staff, monitor CLS compliance at construction sites within their respective jurisdictions.

**5.2.3 Compliance Monitoring and Reporting**

According to the Project Administration Manual (PAM) Paragraph 82, compliance with labor, legal, financial, environmental, and other standards is monitored through project review missions and periodic progress reports. Any instances of non-compliance are reported to relevant authorities, including, the EA/IA.

**5.2.4 Core Principles of ADB-CLS**

The principles of ADB-CLS align with international standards, particularly the International Labor Organization’s (ILO) fundamental principles. They focus on freedom of association, elimination of forced and child labor, non-discrimination, and the promotion of decent work conditions.

**5.2.5 Integration in Agreements**

ADB-CLS is embedded in the ADB Social Protection Strategy and is included as a covenant in loan and grant agreements. Specific provisions for CLS compliance are also incorporated into bidding documents and contracts.

**5.2.6 Legal Obligations**

**The loan agreement signed between Pakistan and ADB mandates compliance with labor standards and national laws. It requires contractors to:**

Adhere to labor laws, including workplace safety norms.

Prohibit child and forced labor.

Ensure non-discrimination and freedom of association.

Raise awareness about risks such as sexually transmitted diseases.

Monitoring and regular reporting to ADB are also stipulated.

**5.3 Methodology for CLS Implementation**

**5.3.1 Coordination and Training**

A focal person at the PMU coordinates CLS-related activities, including orientation sessions for CIU focal persons. CIUs train contractors, workers, and stakeholders on CLS obligations, reporting, and compliance requirements. During the next semester PMU is plaining to visit all CIUs for training of the concerned staff on CLS.

**5.3.2 Information Gathering Methods**

* **Desk Review**: Analysis of existing labor laws and reports.
* **Legal Compliance**: Evaluation of CLS alignment with national and international standards.
* **Workplace Inspections**: On-site assessment of working conditions.
* **Interviews and Surveys**: Data collection from workers and stakeholders.
* **Documentation Review**: Examination of contracts and employment records.
* **Capacity Building**: Training for stakeholders to enhance CLS enforcement.
* **Monitoring and Reporting**: Establishing feedback mechanisms and periodic evaluations.

**5.4 Scope and Objectives**

**Evaluation Goals:**

* Assess KPCIP's adherence to CLS.
* Promote fair wages, decent work conditions, and workers’ rights.
* Identify capacity-building needs.
* Analyze the project's impact on social inclusion and gender equality.
* Mitigate risks and violations associated with CLS.
* Establish mechanisms for continuous monitoring and complaint resolution.

**5.4.1 Implementation Tools:**

ADB provided a CLS monitoring checklist, which was adapted by the PMU to collect and analyze data across construction sites.

**5.5 Grievance Redressal Mechanism (GRM)**

Worker complaints include issues such as insufficient PPE, lack of drinking water, inadequate waste management, and supervisor behavior. Complaints are logged in site-specific registers and resolved promptly through the GRM. Regular monitoring ensures its functionality and accessibility.

**5.6 Key Findings**

* **Labor Standards and Rights**: Workers have access to grievance mechanisms, and no discrimination or forced labor was reported. Awareness of rights and grievance procedures varies across sites.
* **Child Labor**: PMU through the available monitoring staff has ensured strict adherence to labor laws to prevent the employment of children below the legal minimum age.
* **Discrimination and Inclusion**: No instances of discrimination were reported; however, cultural barriers limit female workforce participation.
* **Minimum Wage**: As reported from Kohat and Peshawar ZKB employees are complaining about not adherence to the minimum wage criteria by the contractor. ADB has formulated a Corrective Action Plan (CAP) for implementation in both the cities. Implementation of the CAP is ongoing and has partially been implemented on site.

**5.7 Incident during the Reporting Period**

1. An unfortunate incident was reported from Kohat on 12 December 2024 wherein, a young labourer of 20 years age sustained significant injuries while performing shuttering work at height (13.5 ft approx.) on an overhead tie beam at the OHR Park Phase 2 site near KDA Hospital. During the task the labourer lost his balance and fell down, resulting in serious injuries. Immediately after this incident the labourer was shifted to the nearby KDA hospital but due to severe injuries the labourer was referred to Peshawar to advanced treatment. The CIU and JV contractor’s staff are in regular contact with the attending doctors and para medical staff. The incident is documented in the ESMR, and the report submitted to the ADB (a copy can be found in **Annex 001 of Volume 2 of this SSMR**). According to the PMCSC environmental field staff, all established ADB protocols were adhered to in managing the incident. The external monitor will assess compliance with these protocols, as claimed by the PMCSC.

An inquiry committee has been constituted to know the root cause of the incident. The committee is examining factors such as;

Adequacy of safety measures in place

Environmental conditions (such as the condition of work surface, weather, etc)

Potential lapses in worker safety protocols or equipment.

**Corrective Measures;**

The following immediate corrective measures have already been implemented on site to prevent further risks;

Immediate corrective actions have already been implemented on-site to prevent further risks:

1. **Soft Barricading:** To restrict unauthorized access to potentially hazardous areas and protect workers.
2. **Increased Surveillance:** Enhanced monitoring by safety officers to ensure strict compliance with safety protocols.
3. **Reinforced Safety Protocols:** Additional safety measures, including improved site supervision, are being enforced to ensure adherence to safety standards.

**Compensation from JV Contractor:**

The JV contractor has taken full responsibility for Mr. jan Alam medical treatment and recovery, compensation measures include:

1. **Immediate Medical Compensation:** Mr Jan Alam has received prompt medical care, with financial support covering his initial treatment.
2. **Ongoing treatment in Peshawar:** Mr Jan Alam’s treatment continues at a specialized medical facility in Peshawar. The investigation committee plans to visit him to provide additional support as needed.
3. **Comprehensive Medical Resources:** The contractor has mobilized all available resources to ensure Mr. Jan Alam full recovery, demonstrating commitment to his health and well-being.
4. **Full Medical Coverage:** All medical expenses, including specialized treatment and rehabilitation, will be covered by the JV contractor

In response to the accident, the ZKB Project Manager (PM) has issued the following directives to the JV contractor’s safeguard team:

1. **Prevent Future accidents:** immediate measures must be taken to prevent similar accidents. This includes improving safety protocols, addressing gap in procedures, and upgrading equipment or training where necessary.
2. **Full compensation for injured worker:** The JV contractor must ensure that Mr. Jan Alam is fully compensated for medical treatment and any associated costs (including rehabilitation and lost wages).
3. **Enhance site safety:** Steps must be taken immediately to improve safety measures, particularly around working at height in accordance with **SSHSMP** guidelines**.** This includes enhancing training and ensuring the proper use of fall protection equipment.

### Recommendations and Way Forward

* Strengthen CLS monitoring through penalties for violations and recognition for ethical practices.
* Conduct capacity-building workshops for all stakeholders.
* Establish a centralized grievance management system.
* Foster collaboration between contractors, workers, and regulatory bodies.
* Document and report violations while promoting a culture of compliance and continuous improvement.

### Recommendations and Way Forward

#### ****Strengthen Compliance Mechanisms****

1. **Enhance Monitoring and Reporting**:
   * Establish regular, unannounced workplace inspections focusing on compliance with Core Labor Standards (CLS).
   * Strengthen reporting channels for contractors and workers to ensure real-time tracking of compliance issues.
2. **Rectify Wage Discrepancies**:
   * Expedite the implementation of the Corrective Action Plan (CAP) for Kohat and Peshawar, ensuring adherence to minimum wage criteria.
   * Introduce a system for periodic wage audits to prevent future discrepancies.

#### ****Capacity Building****

1. **Training Programs**:
   * Conduct comprehensive training sessions for PMU, CIU staff, contractors, and workers on CLS compliance and safety protocols, including the proper use of personal protective equipment (PPE).
2. **Focal Point Empowerment**:
   * Strengthen the capacity of CLS focal points by offering advanced training on labor laws, CLS principles, and compliance monitoring.

#### ****Enhance Safety Protocols****

1. **Improved Safety Measures**:
   * Enforce stricter adherence to Site Safety and Health Management Plan (SSHSMP) guidelines, especially for work at height.
   * Conduct periodic safety drills to ensure workers are familiar with emergency response protocols.
   * Implement additional safeguards, such as hard barricading around hazardous areas.
2. **Incident Prevention Measures**:
   * Perform regular audits of safety equipment and protocols to ensure adequacy and functionality.
   * Introduce technology-based monitoring tools (e.g., wearable safety devices) to enhance worker safety.

#### ****Accident Management and Compensation****

1. **Ensure Adequate Compensation**:
   * Monitor the timely and complete compensation for injured workers, including long-term rehabilitation and financial support.
2. **Root Cause Analysis**:
   * Expedite the inquiry process to determine the root causes of the Kohat incident and document findings in a report.

#### ****Way Forward****

* + Ensure immediate implementation of safety directives and training at all sites.
  + Resolve wage-related complaints and enhance the functionality of GRM.
  + Establish a centralized database for monitoring CLS compliance and accident reports.
  + Build the capacity of focal persons and improve workplace conditions across sites.

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## INSTITUTIONAL ARRANGEMENTS

1. The provincial Local Government and LGE&RDD is the executing agency (EA). The PMU is responsible for the day-to-day management of the subprojects (through respective city Implementation Units-CIUs). CIU is managing the project’s day-to-day implementation, approval of project design, contract management and technical input of engineering design through MC and city government. The overall coordination is provided by Project Management Unit (PMU) established at Peshawar (headed by the Project Director). The Social safeguard team under the PMU is already in place to manage the LAR- tasks and activities including handling/resolving any complaints or grievances of those affected by the project (DPs).

### Roles and Responsibilities in Compliance of Social Safeguards Covenants a Contractual Obligations

#### Land Acquisition and Resettlement Framework (LARF): Para 12 & 13

1. Contract award signing conditional to preparation / disclosure of relevant implementation ready LARPs and CAPs approved by ADB and reflecting impacts, DP list and compensation rates.
2. Provision of **notice to proceed to contractors**, conditional to full implementation of LARPs / CAPs (full delivery of compensation/rehabilitation) as confirmed in the LARP/CAP **implementation compliance report** prepared by an **External Monitor Agency/ expert**. Such a condition will be spelled out in the civil work contract.
3. For sub projects categorized as “C” for IR in the SDDR, reverification and confirmation on the absence of IR impact will be done by PMU prior to commencement of civil work reported through the internal monitoring reports. Each social monitoring report will prominently and regularly indicate reverification and confirmation of IR impacts. Any unanticipated impact will require preparation of required safeguard document as per ADB SPS prior to commencement of civil work.

#### Loan Agreement Schedule 4 Para 8:

* 1. The EA shall not award any works contract which involves involuntary resettlement impacts until the EA has “prepared and submitted to ADB the final RP, the final CAP and the final SDDR for that contract and obtained ADB’s clearance of such RPs, CAPs and SDDRs.

1. Loan Agreement Schedule 4 para 4 (a)
2. No notice to commence Works is issued to a contractor in relation to any section or part of such Works unless the applicable provisions of the RP and/or CAP have been implemented and an RP/CAP **Compliance Report, prepared by the external expert.**
3. The role and responsibilities of social safeguards in PMU, CIU and PMCSC was redefined by the ADB mission and replaced with their previous role. The redefined role and responsibilities as described during the ADB mission (lasted from November 26, 2022 to December 10, 2022) given in the table below.

Table 6‑1: Responsibilities of Concerned sections and Institutions

| **No.** | **Institutions** | **Responsibilities** |
| --- | --- | --- |
| 1 | Social Safeguard Project Management Unit (PMU) | * **Role of PMU in LAR planning and implementation** * Preparation and updating of LAR documents * Compliance monitoring/oversight of the implementation of LARP / CAPs / RPs and income restoration plan * Preparation/compilation of quarterly monitoring reports * Preparation of LARP/RPs implementation completion report * Disclosure of LARPs/CAPs/RPs/SDDRs reports on EA’s website, and * Provide guidance and on job coaching to CIUs on LAR aspects |
| 2 | Cities Implementation Units (CIUs) | **Key role in LARP/CAPs/RPs implementation:**   * Implementation of LARP / RP / CAP including disbursement of IVS/resettlement allowances * Facilitate DPs in preparation of documents for receiving LARP/RP/CAP compensation (opening of Bank accounts, inheritance mutation, updating of CNIC and other necessary documents required). * Developing and maintaining gender segregated data base of DPs. * Notification of GRM at District Level, minutes of the meeting of GRCs * Recording and maintaining grievance register * Information disclosure of LARP, GRM and compensation payment * Carry out community consultations, DPs and other relevant stakeholders throughout the project cycle * Preparation of monthly safeguards monitoring reports |
| 3 | Project management Construction Supervision (PMCSC) | * **Key Roles and Responsibilities**: * Assist CIUs in carrying out socio economic and census surveys. * Coordination and consultation with the revenue department. * Provide support to CIUs in information disclosure and consultations. * Provide support to independent valuation specialist (IVS) for preparation of IVS reports. * Supervise and monitor implementation of LARP/RP/CAP * Assist CIU and PMU in addressing community complaints and grievances. * Training of Contractors safeguard staff on LAR aspects. * Supervision, monitoring of LARP/RP/CAP implementation * External Monitoring of LARP/RP/CAP implementation on quarterly basis. * Assist the PMU/CIU/LGE&RDD for stakeholder outreach meetings. |
| 4 | Grievance Redress Committee (GRC) | * GRC will ensure that all grievances related to social issues are registered, formally recorded, reviewed, resolved and the concerned person is informed in a timely manner. * The Project GRC will work as a forum to resolve complaints not resolved   at village GRC. |
| 5 | External Resettlement Monitor (ERM) | * Assessment of implementation progress, * Rescheduling key actions to meet the objective timelines, * Early identification of issues, * Resolving problems faced by the DPs |
| 6 | Board of  Revenue (BoR) | * On request of Executing Agency notification of section 4, 5 and 6 that a land is required for public purpose and required land can be surveyed. * Inventory of affected assets. * Assessment of market Value of the affected assets. * Review of claims of the DPs and decision. * Issuance of final "award". The award includes the land's marked area and the valuation of compensation. * Disbursement of awarded compensations. * Transfer of physical possession of the land to the concerned department or organization and transfer the mutation papers. |

### SOCIAL SAFEGUARD COVENANTS

1. Status of Social Safeguards Compliance: Under the KPCIP a total of 4 LARPs need to be developed. Out of all four (04) LARPs three have already been developed and disclosed on ADB and EA websites i.e., GWSS Swat, LFS Kohat, approach road to WTP-GGWSS Swat. While the remaining one (01) i.e. LFS Abbottabad, has been submitted to ADB for review. The development of LARP for additional land of Charbagh is under process.
2. A separate table on social safeguards covenants is attached as **Annexure 1 of Volume 2.**

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## CONSULTATION AND INFORMATION DISCLOUSARE

### Number of consultations with Displaced Person in each CIU

1. During the reporting period, the social safeguard specialist at CIU Swat conducted a total of 33 meaningful consultations with stakeholders, including representatives from line departments, the Grievance Redress Committee (GRC), and contractors. These meetings addressed social issues related to the MGWSS project, including the transmission main, overhead reservoir (OHR), water treatment plant (WTP), and the access road to the WTP. A total of 199 stakeholders and displaced persons (DPs) participated in these consultations, where most issues—primarily concerning compensation for affected assets, land type, and land ownership—were amicably resolved. During the reporting period consultations were carried out with the DPs/stakeholders and their views and suggestions were incorporated in the report. A total of 102 consultations were held with the stakeholders in all sub projects of KPCIP in which 864 DPs/stakeholders participated. These consultations were mainly focused on the information/data collection for IVS, LARP (draft) Charbagh, Core Labor Standards (CLS), LAR impacts, safeguards compliances and awareness on GRM. City wise consultation logs are attached in **Annexure 2 volume-2** of this report.
2. Under the Integrated Solid Waste Management System in Kohat, 20 meetings were conducted with stakeholders, including officials from line departments and WSSC Kohat, involving 184 participants. These consultations focused on resolving issues related to the disbursement of Board of Revenue (BoR) payments and formulating strategies for payment distribution in collaboration with the affected community.
3. In Mardan's STP project, 13 meetings were held with community members and stakeholders from line departments, engaging 92 male and female participants. These discussions emphasized grievance redress mechanisms (GRM) and compliance with social safeguards. Notably, no sub-project in Mardan has Land Acquisition and Resettlement (LAR) impacts and is categorized as IR (Involuntary Resettlement) Category C. During these consultations, officials and DPs were sensitized on complying with social safeguard measures.
4. Throughout the reporting period, consultations were carried out with DPs and stakeholders, and their feedback was incorporated into the report. A total of 102 consultations were conducted across all sub-projects under KPCIP, engaging 864 participants. These consultations focused on collecting information for the Inventory of Losses (IVS), Draft LARP (Land Acquisition and Resettlement Plan) for Charbagh, Core Labor Standards (CLS), LAR impacts, safeguards compliance, and raising awareness of GRM. Detailed city-wise consultation logs are included in Annexure 2 Volume-2 of this report.
5. Sub-project-specific consultation details are provided in **Annexures 2 Volume 2,** including gender-inclusive consultations and women's participation percentages.
6. Multiple consultations were conducted with female DPs across various sub-projects under KPCIP. These sessions were led by the social safeguard specialists of respective CIUs, and during socio-economic and census surveys, female CIU and PMCSC staff also participated in consultations with female DPs and other community members. A dedicated team of male and female social mobilizers worked closely with the PMU’s social safeguard specialist to conduct these discussions. The primary purpose was to address social safeguard compliance issues.

### Status of Disclosure of Approved, LARPs/CAPs/RPs

1. Out of nine sub-projects, 7 safeguard documents—including LARP-MGWSS (transmission main and WTP), RP for Pedestrianization in Abbottabad, CAP for LFS Peshawar, CAP for Choona Water Treatment Plant Abbottabad, LARP for Kohat, and LARP for the "Approach Road to WTP" and LARP for Additional Land of Charbagh-MGWSS—have been approved and disclosed on the ADB and EA websites. The LARP for LFS Abbottabad has been submitted to ADB for review. During the reporting period, extensive information dissemination activities for the approved safeguard documents were conducted.
2. Displaced persons have been informed about their entitlements, compensation unit rates, income restoration and rehabilitation assistance, and payment procedures as outlined in the Entitlement Matrix of each LAR document.

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## GRIEVANCE REDRESSAL MECHANISM (GRM)

### Grievance Redressal Mechanism (GRM)

1. **Grievance Redressal Committees**

A three-tier Grievance Redressal Mechanism (GRM) has been established to address grievances at the village/community level, city level, and project/PMU level. Each committee includes members from KPCIP, the Revenue Department, and Displaced Persons (DPs). The village-level Grievance Redressal Committee (GRC) focuses on resolving issues at the village or community level. Members of the GRC ensure that the concerns of aggrieved individuals and communities are adequately represented in the grievance resolution process.

1. **Accessibility and Functionality of the GRM**  
   The GRM is designed to be easily accessible, gender-sensitive, culturally appropriate, widely publicized, and seamlessly integrated into the project’s management framework. It is supported and valued by the local communities. The inclusion of community representatives in the village-level GRC facilitates prompt grievance resolution, often without requiring extensive documentation.
2. Unresolved cases or those where DPs remain dissatisfied are escalated to the city-level GRC (stage 2). If further resolution is needed, the case proceeds to the project-level GRC (stage 3). Importantly, the GRM does not restrict DPs' access to the judicial system, allowing disputants to seek legal redress at any stage. Complaints can be lodged verbally or via specified forms. GRCs investigate, resolve, and implement decisions within a stipulated timeframe while maintaining a database of complaints and their resolution status.
3. GRCs in Swat, Abbottabad, Peshawar, Mardan, and Kohat have addressed and resolved numerous grievances related to land and land-based assets.
4. **Coverage and Implementation**  
   Communities affected by the nine subprojects with involuntary resettlement (IR) impacts face losses of land and land-based assets. The GRM is operational, with all three tiers of grievance redressal committees officially established and actively addressing the concerns of affected communities and stakeholders.
5. **Awareness and Monitoring**  
   Awareness sessions are being conducted to educate communities about the GRCs and their roles. Complaint registers have been placed at the PMU, all CIUs, and active construction sites. The primary mandate of the GRCs is to encourage the registration of complaints, assess grievances, and resolve issues arising from project implementation.
6. These registers are also used to document complaints related to the ADB-CLS. Focal persons from the CIU, PMCSC, and contractors are responsible for lodging complaints and reporting them to the appropriate GRC members. A summary and detailed record of grievances, categorized by CIU, are provided in **Annexure 3 of Volume 2 of this SSMR.**
7. In line with ADB’s commitment to transparency and stakeholder engagement, the project management unit (PMU) is in the process of developing a comprehensive information dissemination strategy to enhance public awareness regarding the ADB-Pakistan Resident Mission (PRM) and ADB’s Office of the Ombudsperson (OD) as formal venues for receiving complaints. While full-scale disclosure activities have yet to commence, the project team is ensuring that all communication materials, including information brochures, tarpaulins, and other public notices, will prominently feature the contact details of the ADB-PRM and OD. This approach aims to equip displaced persons (DPs) and other stakeholders with clear and accessible information about how to raise grievances through appropriate channels, including the Grievance Redress Committee (GRC) as the primary avenue, while also making them aware of the alternative escalation pathways through ADB-PRM and OD.
8. Moving forward, the PMU will incorporate these efforts into subsequent Social Monitoring Reports (SMRs) to document the ongoing initiatives aimed at improving public awareness of the PRM and OD. The project team will also explore additional opportunities for capacity-building sessions and community meetings to further reinforce the visibility of these institutions in grievance handling. By promoting a clear and structured grievance redress mechanism, including the roles of ADB-PRM and OD, the project strives to build trust with affected communities and provide a transparent, accessible, and effective process for addressing concerns.

### Status of Complaints / Grievances

1. During the reporting period the social safeguard team maintained close liaison with the DPs and other stakeholders for early redressal of the grievances.
2. **Swat:** A total of 214 complaints were received from the DPs in Swat. Three complaints were regarding the size of the affected land, type of land and different land parcels / Khasras, and some mutation issues. For redressal of these complaints, the GRCs convened meetings and resolved the complaints within the stipulated time period. Total 214 complaints were received in the CIU out of which 202 Complaints were resolved**.**
3. **In Kohat:** It is worth mentioning that since the formation of GRC 89 complaints have been received by the Grievance Redress Committee on the subprojects i.e., Land Fill Site, construction of women business center, uplifting of old and construction of new water tanks and sewage treatment plant under the KPCIP in Kohat out of which 88 were resolved
4. **Abbottabad:** A total of 30 complaints received in Abbottabad out of which 23 complaints were resolved and closed, while 23 Complaint remained unresolved and 1 complaint is the civil court for resolution.
5. **Peshawar:** A total of, 53 complaints were received in CIU Peshawar and all have been resolved. On one of the active complaint of OHR Danish Abad a meeting of GRC 3rd tier is scheduled to on 2nd January 2025 under the chairmanship of Special Secretary LGE&RDD. It is pertinent to mention that this complaint is active from the last year.
6. **Mardan:** The social safeguard specialist and the team of CIU is in close liaison with the, community and GRC for redressal of any complaint (if registered with the GRC). Total 48 complaints have been received from the community and all have been resolved.
7. **Court Case in Choona Water Treatment Plant Abbottabad:** A legal dispute has arisen concerning the Choona Water Treatment Plant subproject in Abbottabad. Mr. Sultan Muhammad, a Displaced Person (DP) of the subproject, has filed a court case against his co-owners, alleging that the Board of Revenue (BoR) has improperly transferred his ancestral property to other villagers. The subproject requires a total of 55 Kanals and 12 Marlas of land, of which Mr. Sultan's complaint pertains to 54 Kanals. In December 2022, the complainant sought assistance from the Grievance Redressal Committee (GRC) of the City Implementation Unit (CIU) in Abbottabad for prompt resolution of his concerns. The social safeguard team of the Khyber Pakhtunkhwa Cities Improvement Project (KPCIP) made genuine efforts to address the issue, engaging in meaningful consultations with the aggrieved DP. Despite their efforts, both parties maintained their opposing positions. As a result of these consultations, an agreement was reached and signed by the DP and the CIU Abbottabad. According to the agreement: Payment was made for the undisputed portion of land, amounting to 1 Kanal and 12 Marlas. Payment for the disputed 54 Kanals will remain withheld until the Civil Court delivers its final verdict. The compensation for the undisputed land, based on both BoR and Independent Valuation Study (IVS) assessments, has been disbursed to the DP. However, the case regarding the disputed land remains pending in court.
8. Summary of the complaints received in all sub projects of KPCIP is given below;

Table 8‑1: SUMMARY OF THE COMPLAINTS

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Sr #** | **CITY** | **TOTAL COMPLAINTS RECEIVED** | **COMPLAINTS RESOLVED** | **COMPLAINTS UNRESOLVED** |
| 1 | Kohat | 89 | 88 | 01 |
| 2 | Mardan | 48 | 48 | 00 |
| 3 | Abottabad | 30 | 23 | 07 |
| 4 | Swat | 214 | 202 | 12 |
| 5 | Peshawar | 53 | 53 | 0 |
| **Total** | | **381** | **361** | **20** |

1. Detailed list of complaints received in each CIU on all active construction sites is provided in **Annexure 3 of Volume 2.**
2. **Complaints Received and Referred for Resolution**:

The following complaints were directly submitted to the Asian Development Bank (ADB) and subsequently referred to the project for resolution:

1. KPCIP: Complaint by Shahzad Gul:

* Issue: Concerns regarding the water intake for the Choona Water Treatment Plant and its distribution network.
* Actions Taken:
* Community consultations and water consumption surveys have been completed, with the final report submitted to the Project Management Unit (PMU).
* Survey findings and proposed next steps were discussed with ADB.
* An ADB Office of the Special Project Facilitator (OSPF) Mission visited KPCIP on October 22, 2024, to assess the complaint and ongoing resolution efforts. The mission expressed satisfaction with the PMU's initiatives.
* ADB is engaging directly with the complainant and the Dara Action Committee for further resolution.
* ADB Islamabad has shared ongoing efforts with OSPF and is seeking expert opinion from ADB Headquarters to determine the next course of action.
* As a potential solution, the PMCSC team is exploring an alternative design to address the issue in consultation with the complainant

1. **KPCIP: Complaint by Dr. Mujeeb Ur Rehman – OHR Danishabad, Peshawar**

* **Issue:** Request for intervention at the Tier-3 level of the Grievance Redressal Committee (GRC).
* **Actions Taken:**
* The Project Director (PD) at PMU, acting as the Secretary of Tier-3, has formally requested the Special Secretary of Local Government, Elections & Rural Development Department (LGE&RDD), who chairs Tier-3, to convene a meeting.
* The letter outlines the need for Tier-3 intervention and requests a discussion on previous proceedings (Tiers 1 and 2) to reach an amicable resolution.
* A Tier-3 meeting is scheduled at PMU-KPCIP on January 2, 2025, chaired by the Special Secretary, to address the matter.

1. **Complaint Regarding Water Tank Construction on Unsuitable Land – Syed Liaqat Ali & Yaqoob Khan, Syed Abad, Baligram, Mingora**

* **Date of Submission:** June 26, 2024 (forwarded to ADB on July 24, 2024).
* **Issues Raised:**
  1. Compensation for the acquired land.
  2. Blockage of access to the complainants' remaining land.
  3. Obstruction caused by rainwater runoff from higher ground.
* **Resolution:** Based on available facts and the GRC's decision, the complaint has been closed.

1. KPCIP-Complaint of Mr. Saddiq Khan. Application for Compensation due to impact on lands from ongoing installation of transmission main at Mingora: After resolving one issue in Tier-1 through good faith efforts, the complaint has been escalated to Tier-2. The second issue relates to the complainant's land within the Right of Way (ROW) and will be addressed in collaboration with the National Highway Authority (NHA) and the Board of Revenue (BoR) in Tier-2. The temporary blockage of access to the complainant’s hotel has been restored.
2. KPCIP-On 12th December 2024 Mr. Anwar kamal burki (RSO) has approached the ADB PTL via email, and has levied multiple accusation on the subproject of green urban space sports complex Kohat: Upon receiving the complaint, the Director Compliance-PMU engaged the complainant to assure him of KPCIP's cooperation. The PMU also tasked the CIU with responding to the complainant and documenting the measures taken to address concerns.The CIU reported consistent engagement with the complainant since November 21, 2024, to resolve the issues amicably. On December 20, the DC Kohat visited the sports complex where the CIU given a presentation on the project. For amicable redressal of the complaint the PMU team is constantly engage with the complainant.
3. **KPCIP: Complaint by ZKB Employees (Kohat & Peshawar) Against Contractor (Zahir Khan and Brothers – ZKB)**

* **Issues Raised:**
  + Minimum wage violations.
  + Delayed salary payments.
  + Workplace security concerns.
  + Health and safety issues.
  + Excessive working hours.
* **Actions Taken:**
  + An inquiry was launched against the contractor following the complaint.
  + The investigation report was finalized and shared with ADB.
  + Based on findings, ADB developed a Corrective Action Plan (CAP) to address employee concerns.
  + CAP implementation is currently in progress, with partial completion to date.

# CONCLUSION

### Sub projects with LAR impacts and status of the social safeguards’ compliance

1. No-objection certificates (NOCs) obtained from the relevant agencies for all subprojects.
2. To ensure implementation of Core Labore Standard (CLS) on the active construction sites the social safeguard team has collected the CLS related information on each active site of KPCIP. The implementation of ADB formulated Corrective Action Plan (CAP) is ongoing.
3. A Corrective Action Plan (CAP) for addressing gapes in implementation of ADB-CLS has been prepared by the CIUs Swat and Mardan. The focal person for CLS will keep follow up on the identified gapes.
4. As per loan agreement some of the socials safeguard loan covenants have been compiled while others are being complied. The status of social safeguards covenants is attached Annexure 1 volume-2 of this report.
5. During the reporting period no impact seen or noticed regarding issue of women mobility and privacy in the project affected area. So, no big challenge or threat being observed by the social safeguard team regarding women mobility or privacy.
6. LARP for Landfill Site Abbottabad has been completed and submitted to ADB for review and subsequent approval.
7. Lot wise summary of disbursement has been provided in the report while details of each individual has also been provided in Annexure 4 to 8 volume-2 of the SSMR.

Table 9‑1: Lot wise Summary of disbursement

| **Lot wise sub project** |  | **Total No of DPs** | **BOR** | | | **IVS** | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Total amount** | **Amount disbursed with %age** | **No of DPs who received the amount** | **Total amount** | **Amount disbursed with %age** | **No of DPs who received the amount** |
| Pedestrianization of Market in Old City Centre & Urban Green Space Initiatives Abbottabad | CW-01, Lot-1 | 129 | 1,977,500 | 1,960,500 (99.14%) | 126 |  |  |  |
| Integrated solid waste management and landfill Peshawar | CW-05-7 | 238 | 151,232,857 | 135,098,601 (89.78%) | 152 |  |  |  |
| Choona Water Treatment Plant Abbottabad | CW-02, Lot-2 | 255 | 1,826,277 | 790,803  (44%) | 7 | 24,582,107 | 2,507,078 (10.19 %) | 7 |
| Intake, transmission to WTP and supply mains Abbottabad | CW-02, Lot-1 |  |  |  |  |  |  |  |
| Mingora Greater Water Supply Scheme Swat (Main Transmission Line and WTP) | CW-04, Lot-2 |  |  |  |  |  |  |  |
| Khwazakhela | 678 | 396,410,193 | 394,370,762 (99.49%) | 658 | 353,933,501 | 350,190,474 (98.94%) | 647 |
| Charbagh | 1552 | 304,315,259 | 190,407,243 (62.57%) | 960 | 71,658,870 | 37,985,759 (53.01%) | 484 |
| Babuzai | 277 | 67,485,834 | 52,497,892 (77.79%) | 236 | 18,196,494 | 8,973,421 (49.31%) | 234 |
| OHRs/SWTs | 34 | 203,409,150 | 203,409,150 (100%) | 34 |  |  |  |
| Approach Road to Mingora WTP-Swat | CW-04, Lot-1 | 31 | 38,522,991 | 38,522,991 (100%) | 31 | 2,419,939 | 2,419,939 (100%) | 31 |
| Charbagh Component Pipeline of MGWSS-Swat | CW-04, Lot-2 |  |  |  |  |  |  |  |
| Landfill Site Kohat | CW-05-7 | 3695 | 128,789,200 | 27,728,518  (21.53%) | 852 |  |  |  |
| Landfill Site Abbottabad | CW-05-7 | 469 | 174,090,181 | 92,094,227 (53%) | 175 |  |  |  |

### Disclosure

1. The SSMR for the (January–June 2024), has been disclosed on the EA and ADB websites.

**9.3 Recommendations**

1. Based on the conclusions and findings of the report, the following recommendations are proposed to facilitate the implementation of LARP/RP/CAP:
   1. To ensure adherence to ADB’s Core Labor Standards (CLS), all focal persons must strictly comply with CLS requirements across active sites and regularly monitor the Corrective Action Plan (CAP) for CLS compliance.
   2. Since CLS is a newly introduced component of the project’s safeguard compliance framework, the PMU recommends comprehensive training for the project team to adopt best practices and ensure effective implementation of CLS.
   3. Maintain all good-faith efforts to facilitate the disbursement of funds currently held in the escrow account.
   4. All stakeholders should actively engage and collaborate to make the Grievance Redress Mechanism (GRM) more responsive, ensuring timely resolution of complaints.
   5. The PMU, through CIUs, must ensure the implementation of skill development and livelihood restoration training programs as outlined in the LARP/RP.
2. During the reporting period, the PMU, with the support of social safeguard staff from each CIU and PMCSC, has made further disbursements for the following sub-projects thus requesting the EMA is to verify these disbursement:
3. Babuzai (Transmission Main) MGWSS: 2 DPs received their BoR and IVS determined compensation of their affected assets. EMA is requested to verify disbursement to these 2 DPs.
4. **Charbagh (Transmission Main) MGWSS**: 568 DPs (majority from Mouza Charbagh) received their BoR and IVS determined compensation of their affected assets. **EMA is requested to verify disbursement to these 568 DPs.**
5. **OHR-9 Mingora MGWSS**: 1 DP received his BoR determined compensation of his affected assets. **EMA is requested to verify disbursement to this 1 DP.**
6. **Water Tanks (Shiekh Ul Bandi (Tank No. 4 and 12) and Nawan Shehr Shumali (Tank-1) Abbottabad:** During the reporting period compensation of land has been disbursed to 16 land owner of 3 OHRs in Abbottabad. **EMA is requested to verify the DPs and the disbursed amount.**
7. **Khwazakhela (Transmission Main):** 3 DPs received their BoR and IVS determined compensation of their affected assets from the ESCROWD account. Earlier their amount was ESCROWD due their non-availability at site. **EMA is requested to verify disbursement to these 3 DPs.**
8. Project GRM need to be strengthened and utilized as a tool to encourage the registration of grievances and complaints related to the project, ensuring their immediate and reasonable resolution.
9. Payment vouchers of all paid amount are attached in Annexure 4 to 8 **Volume-2 of this report.** The EMA is requested to verify the vouchers and disbursement made to the DPs as per list attached.