

**Islamic Republic of Pakistan  
Government of Balochistan**

**System Transformation of Early Education  
Project in Balochistan (STEP-B): P507717**

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

**January 20<sup>th</sup>, 2025**

**For Appraisal**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Balochistan (the Borrower) will implement the **System Transformation of Early Education Project in Balochistan (STEP-B)** (the Project), with the involvement of **Project Management Unit-School Education Department (PMU-SED), Government of Balochistan**. The International Development Association (the World Bank), will provide the financing (P507512) for the Project.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the Borrower, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower through Government of Balochistan; and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and Borrower. The Borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish an Environment and Social Management Unit (ESMU) in PMU-SED to support management of ESHS risks and impacts of the Project, with qualified staff and resources, including Environment and Social Specialist Officers</p> <p>PMU-SED will engage a Third-Party Validation (TPV) firm for annual monitoring of Environment and Social compliance progress during Project implementation and will share their report with the Bank.</p>	<p>Establish and maintain an ESMU in PMU=SED as set out in the Financing Agreement no later than 60 days of the Project effectiveness, and thereafter maintain throughout Project implementation.</p> <p>Annually (throughout the project lifecycle)</p>	PMU-SED
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>PMU staff and contractors training may be required in:</p> <ul style="list-style-type: none"> <li>• ESMF and ESMP Implementation</li> <li>• Occupational Health and Safety</li> <li>• Monitoring and Reporting</li> <li>• GBV &amp; Child Protection</li> <li>• Disability Inclusion</li> <li>• Waste Management</li> <li>• Community Health &amp; Safety</li> </ul> <p>Project workers training may be required in:</p> <ul style="list-style-type: none"> <li>• ESMP Implementation</li> <li>• Labor Management Procedures</li> <li>• Occupational Health and Safety</li> <li>• Emergency Response Preparedness</li> <li>• Grievance Redress Mechanisms</li> <li>• Code of Conduct</li> </ul>	<p>Prior to initiation of civil works and throughout the project implementation (where required) periodically.</p>	<p>ESMU</p> <p>ESMU</p>
MONITORING AND REPORTING			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	<p><b>REGULAR REPORTING</b></p> <p>Regular reports on the Environmental and Social Safeguard (E&amp;S) of the Project will be prepared and submitted to the World Bank, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s), supporting firm monthly and quarterly progress reports and contractors' monthly compliance reports.</p>	Submit Quarterly ESHS reports to the World Bank within 45 days after the end of each reporting period, throughout the duration of Project implementation.	ESMU
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Contractors and supervising firms to provide monthly monitoring reports on E&amp;S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the World Bank</p>	Monthly	ESMU
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>PMU-SED will promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury, or exposure to hazardous waste.</p> <p>PMU-SED will provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Within 24 hours after learning of the incident or accident.</p> <p>A detailed report within a timeframe agreed at with the Bank.</p>	PMU-SED
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>PMU-SED will finalize the draft Environmental and Social Management Framework (ESMF), to identify and assess the environmental and social risks and impacts of the Project and suggest appropriate mitigation measures under ESS1 and with reference to other relevant ESS specifically ESS3 Resource Efficiency and Pollution Prevention and Management, and ESS4 Community Health and Safety. The ESMF will be publicly disclosed after its finalization</p>	<p>The final ESMF shall be adopted no later than 60 days after Project effectiveness.</p> <p>Prepare and adopt site specific E&amp;S Screenings before launching bidding process for the respective subprojects and prepare and adopt site-specific ESMFs, if</p>	ESMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	PMU- SED will prepare and disclose Environmental and Social Management Plans (ESMP) for subprojects as set out in the ESMF.	needed, prior to commencement of civil works.  Once finalized, the respective ESMP shall be implemented throughout Project lifecycle	
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Environmental and social requirements (reflecting ESCP) will be included in the procurement and contracting process including bidding documents, for any civil works.</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	<p>Prior to the preparation of procurement documents and issuing bidding documents.</p> <p>Contractors' supervision (on implementation) throughout project implementation.</p>	ESMU
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Capacity building, training, and any other technical assistance activities under the Project, including, inter alia, surveys, environmental and social assessments, etc. will be carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the ESSs (such as the specific studies/assessments focusing on capturing the resource efficiency gained particularly on energy use, water availability and productivity during the course of project implementation).</p>	Throughout Project implementation.	PMU-SED
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>The Labor Management Procedures (LMP) for the Project shall be prepared and implemented as part of the Project Operations Manual</p>	Within 90 days of Project Effectiveness.	PMU-SED
2.2	<b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Occupational, health and safety (OHS) measures and safety management plan shall be developed and implemented as part of the Project Operations Manual. The OHS measures shall be made included in the bidding documents, contractors' contracts and ensure compliance by the Contractors.	Within 90 days of Project Effectiveness and implanted throughout the Project lifecycle	PMU-SED
2.3	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> A grievance mechanism for Project workers shall be established, maintained, and operated. The GRM should also be designed to address labor-related GBV/SEA/SH issues including provision of a referral system.	Grievance Mechanism to be operational prior to engaging any project workers and maintained throughout Project implementation.	PMU-SED
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN</b> A Waste Management Plan (WMP), as part of the ESMPs would be prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3 will be prepared and implemented.	Prior to commencement of civil works for the respective subproject	ESMU
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Resource efficiency and pollution prevention shall be incorporated, and management measures in the ESMPs will be prepared.	Same timeframe as for the adoption and implementation of the ESMPs	ESMU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Measures and actions included in a Traffic and Road Safety Plan, to assess and manage traffic and road safety risks shall be adopted and implemented.	Prior to commencement of civil works for the respective subproject.	ESMU
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Specific risks and impacts to the community arising from Project activities including, inter alia, risks of injury, air and noise pollution, spread of communicable diseases, labor influx, GBV, SEA/SH, elite capture, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Prior to commencement of civil works for the respective subproject	ESMU
4.3	<b>SEA AND SH RISKS</b> A GBV/ SEA/SH and Violence Against Children Action Plan, to assess and manage the risks of GBV, SEA SH and child abuse shall be prepared and implemented.	Prepared prior to commencement of project activities and within 90	ESMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		days of Project Effectiveness. Thereafter implement the SEA/SH Action Plan throughout Project implementation	
4,4	<b>SECURITY MANAGEMENT</b> Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities. as set out in a Security Management Plan	Prior to commencement of civil works for the respective subproject.	ESMU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<i>Not currently relevant</i> .		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> <i>Not currently relevant</i>		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<b>INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS]</b> <i>Not currently relevant</i>		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b> <i>Not currently relevant</i>		
8.2	<b>CHANCE FINDS</b> A Chance Finds Procedure will be incorporated into the ESMPs for subprojects	Implement the procedures throughout Project implementation	
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	<i>Not currently relevant</i>		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Update and implement a Stakeholder Engagement [Framework] Plan [(SEF)] [(SEP)] for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Implement throughout the Project lifecycle	ESMU
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Within 60 days of project effectiveness and before issuing first bidding document and first procurement order	PMU-SED
<b>INDICATORS FOR IMPLEMENTATION READINESS</b> <ul style="list-style-type: none"> <li>Action 1.1: The draft ESMF is finalized, adopted and redisclosed</li> <li>Project Operations Manual including LMP and OHS provisions is adopted</li> </ul>			