Islamic Republic of Pakistan

Secondary Education Department
Government of Balochistan

System Transformation of Early Education Project – Balochistan
&
Getting Results: Access And Delivery of Quality Education Services in Balochistan

P507717 & P507512

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

April 04th 2025

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Abbreviations and Acronyms

BEPA	Balochistan Environmental Protection Agency
EIA	Environment Impact Assessment
ESMF	Environmental and Social Management Framework
EPA	Environmental Protection Agency
ESMP	Environmental and Social Management Plan
ECE	Early Childhood Education
GoB	Government of Balochistan
GBV	Gender Based Violence
GRADES-B	Getting Results: Access and Delivery of Quality Education Services in Balochistan
GRM	Grievance Redress Mechanism
IEE	Initial Environmental Examination
NCAP	National Clean Air Program
NEQS	National Environmental Quality Standards
NGO	Non-Governmental Organization
PEPA	Pakistan Environmental Protection Act
PMU	Project Management Implementation Unit
SED	Secondary Education Department
SEP	Stakeholder Engagement Plan
STEP-B	System Transformation of Early Education Project - Balochistan

Executive Summary

Background: Pakistan's per capita income increased from $1,551 in FY2023 to $1,680 in FY2024, yet poverty remains critical, with 40.5% of the population living below the poverty line. The country's challenges include unproductive agriculture, protectionist policies, fiscal deficits, and a struggling energy sector. Social issues, such as low school enrollment, high learning deprivation, and child malnutrition, persist. Environmental issues, including rising air and water pollution, add to these challenges. Despite stabilization efforts, sustained growth requires deeper reforms and addressing environmental concerns.

Need for ESMF: The Environmental and Social Management Framework (ESMF) supports due diligence for World Bank-funded projects in Balochistan: STEP-B and GRADES-B, aimed at improving education access and quality through infrastructure, teacher training, and governance reform.

Objectives: The ESMF outlines the identification, assessment, and management of environmental and social risks, establishes screening procedures, assigns roles and responsibilities, and provides for public consultation, grievance mechanisms, and budget requirements. It aligns with the World Bank's Environmental and Social Framework (ESF) and E&S Standards (ESSs) and national laws.

Project Description

STEP-B will be implemented in the 05 districts of Balochistan (Quetta, Pishin, Killa Abdullah, Chaman & Chagai), while GRADES-B will be implemented throughout the province.

- **STEP-B Components**
    - **Quality Enhancement**: Revise Early Childhood Education (ECE) curriculum, provide teacher training, and deliver age-appropriate learning materials.
    - **Access Expansion**: Construct and rehabilitate classrooms, improve WASH facilities, and run enrollment campaigns.
    - **Monitoring & Evaluation**: Develop data systems and M&E frameworks for project accountability.
- **GRADES-B Components**
    - **Education Reform**: Introduce performance-based policies and improve literacy and numeracy outcomes.
    - **Access & Equity**: Establish community-based schools and introduce gender equity programs.
    - **Implementation Support**: Strengthen institutional capacity and evaluate progress.
    - **Emergency Response**: Design a rapid response mechanism for emergencies.

Environmental and Social Policies, Regulations, and Laws

Before the 18th Amendment to Pakistan's Constitution, both federal and provincial governments could legislate on environmental pollution and ecology under the Concurrent Legislative List, but federal law took precedence in case of conflict. Provincial governments derived their authority from federal laws. After the 18th Amendment in 2010, the Concurrent List was abolished, and legislative powers on most

subjects, including environmental pollution and ecology, were devolved to the provinces. Climate change, however, remains under federal jurisdiction.

- **Pakistan's Legal Framework**: The national and provincial laws, such as the Pakistan Environmental Protection Act (PEPA) 1997 and its provincial adaptation (BEPA 2012), provide guidelines for environmental protection, pollution control, and sustainable development. These laws ensure compliance during construction, rehabilitation, and other activities.
- **National Environmental and Social Assessment:** The PEPA requires environmental assessments (IEE/EIA) for projects that could cause physical environmental changes. The Balochistan Environmental Protection Agency (BEPA) ensures these assessments are conducted and approved.
- **World Bank Standards:** Both STEP-B and GRADES-B projects align with the World Bank's several Environmental and Social Standards (ESS). ESS1 is relevant for both projects, as they involve moderate environmental and substantial social risks, with this Environmental and Social Management Framework (ESMF) developed to guide risk assessment and mitigation. ESS2 applies to both due to labor-related risks such as occupational health and safety (OHS) concerns, potential child labor, and employment terms, addressed through Labor Management Procedures (LMP) which will be prepared immediately following project effectiveness. ESS3 is also pertinent, as construction activities in both projects may generate waste and increase resource use; mitigation includes climate-resilient or climate-smart designs. Community risks associated with construction, such as noise, dust, and accidents, make ESS4 relevant, with specific measures for community and school safety integrated into the plans. ESS8 is significant for both projects to address potential impacts on cultural heritage, with a Chance Finds Procedure included in the ESMFs. However, ESS5 is relevant only to GRADES-B due to potential small-scale land acquisition, managed through a Resettlement Policy Framework (RPF). Other standards like ESS6, ESS7, and ESS9 are not relevant to either project, while ESS10 is critical for effective stakeholder engagement and grievance mechanisms in both, tailored to their respective contexts. Key gaps between national and World Bank frameworks will be addressed, particularly in areas such as stakeholder engagement and cultural heritage protection.

Potential Environmental and Social Risk Impacts and Standard Mitigation Measures: The STEP-B and GRADES-B projects are expected to significantly improve education in Balochistan by enhancing early childhood education through curriculum revisions, teacher training, and better learning materials. Access to education will expand with new classrooms, improved WASH facilities, and enrollment campaigns targeting marginalized groups. GRADES-B will further boost literacy and numeracy, establish community-based schools, and promote gender equity with scholarships and safe transport for girls. Strengthened institutional capacity and an emergency response mechanism will ensure resilience. Together, these initiatives will foster inclusive, equitable, and sustainable education, empowering communities and driving socio-economic progress. However, the Environmental and Social Risk Impacts and Mitigation Measures address potential risks across various project components, including exclusion of marginalized groups, data privacy, environmental degradation, and lack of inclusivity in education materials and infrastructure. Mitigation strategies focus on culturally sensitive approaches, such as using local languages, providing flexible schedules, and partnering with community leaders. Environmental safeguards include sustainable resource use, rainwater harvesting, and eco-friendly materials. For vulnerable groups like girls, children with disabilities, ethnic minorities, and economically vulnerable families, specific measures include scholarships for female teachers, disability-inclusive infrastructure,

culturally sensitive teaching materials, and financial support for families. Comprehensive planning ensures community engagement, disaster-resilient infrastructure, and emergency preparedness, with an emphasis on ongoing training and monitoring.

Procedures and Implementation Arrangements: The Environmental and Social Management Framework (ESMF) for STEP-B and GRADES-B projects comprehensively outlines to manage risks throughout the projects' cycle. This includes screening of subprojects prior to physical execution and to ensure they are aligned with environmental and social criteria. The outcomes of the E&S screening will determine the E&S viability of the subproject(s)/investments and the need for developing further E&S tools/instruments such as site-specific Environmental and Social Management Plans (ESMPs) as required under ESF/ESSs. The PMU-SED through dedicated E&S staff would be responsible for overseeing ESMF implementation, including monitoring, reporting, and training of staff and contractors. Key activities include stakeholder consultations, grievance tracking, and site restoration. Capacity building and regular training are provided at various levels to ensure effective management of environmental and social risks throughout the project's lifecycle.

Stakeholder Engagement, Disclosure, and Consultations: The Stakeholder Engagement Plan (SEP) for the STEP-B and GRADES-B projects aims to inform, engage, and gather feedback from stakeholders on the potential environmental and social impacts. Its objectives include raising awareness, ensuring the inclusion of marginalized groups, addressing environmental and social concerns, and building trust among local communities. Primary stakeholders include government entities, beneficiaries (teachers, students, and communities), project partners (contractors, NGOs), and other groups like the World Bank and media. Engagement activities will involve workshops, focus groups, surveys, and public consultations, with materials in local languages. The process includes pre-consultation preparation, consultation events to present project details and risks, and post-consultation follow-up to document feedback and integrate it into project planning.

1. Introduction

1.1. Background

The per capita income of Pakistan has improved from $1,551 in FY2023 to $1,680 in FY2024, yet poverty remains a critical issue. The lower-middle income poverty rate is estimated at 40.5% in FY2024, with an additional 2.6 million people falling below the poverty line over the past year. This rise in poverty is attributed to economic shocks, including the 2022 floods, COVID-19, and macroeconomic volatility. Structural issues such as unproductive agriculture, protectionist trade policies, fiscal and current account deficits, and a financially unsustainable energy sector have further impeded growth and poverty alleviation. Social challenges persist, with over one-third of school-age children out of school, two-thirds of students learning deprived, and 40% of children stunted in FY2023.

The government has made strides toward macroeconomic stabilization through measures like an IMF Stand-By Arrangement approved in July 2023, which restored exchange rate flexibility, relaxed import controls, and aimed to contain the fiscal deficit. Despite these efforts, downside risks remain high due to political and policy uncertainty, geopolitical instability, and the need for additional external financing. Sustained growth requires broader fiscal and economic reforms, including improvements in the business environment, targeted fiscal restraint, and structural changes in the energy sector.

Environmental concerns compound these challenges. Air pollution levels are rising despite programs like the National Clean Air Program (NCAP), hindered by enforcement and resource constraints. Water pollution is projected to increase by 25% as population growth adds pressure to water bodies. While the economy is gradually recovering, achieving robust and sustained growth will require steadfast

implementation of reforms, fiscal discipline, and a clear strategy to address long-standing structural and social challenges.

1.2. Need for ESMF

This Environmental and Social Management Framework (ESMF) is developed to support the environmental and social due diligence provisions for activities financed by the World Bank under two separate projects. These projects include: (1) The System Transformation of Early Education Project - Balochistan (STEP-B) and (2) Getting Results: Access and Delivery of Quality Education Services in Balochistan (GRADES-B). The projects aim to enhance access to and the quality of education in Balochistan through activities such as the establishment of early childhood education centers, teacher training programs, infrastructure improvement, and governance strengthening across the province. The Government of Balochistan will implement the project activities through its respective departments, including the Balochistan Education Department and associated agencies.

1.3. Objectives

This ESMF adheres to the World Bank's Environmental and Social Framework (ESF) as well as the national laws and regulations of Pakistan, including relevant provincial laws applicable in Balochistan. The framework aims to ensure that the potential environmental and social risks and impacts of the projects are effectively identified, assessed, and managed in compliance with the World Bank's Environmental and Social Standards (ESSs) and national requirements.

The specific objectives of the ESMF are to:

1. Assess the potential environmental and social risks and impacts of the proposed project and propose mitigation measures.
2. Establish procedures for environmental and social screening, review, approval, and implementation of activities.
3. Specify appropriate roles and responsibilities, and outline the necessary reporting procedures for managing and monitoring environmental and social issues related to the activities.
4. Identify staffing requirements, as well as training and capacity-building measures, needed for successful implementation of the ESMF.
5. Address mechanisms for public consultation and disclosure of project documents, as well as grievance redress mechanisms for affected stakeholders.
6. Establish budgetary provisions required for the effective implementation of the ESMF.

This ESMF should be read in conjunction with other project-specific documents, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP), and any additional plans prepared for these projects.

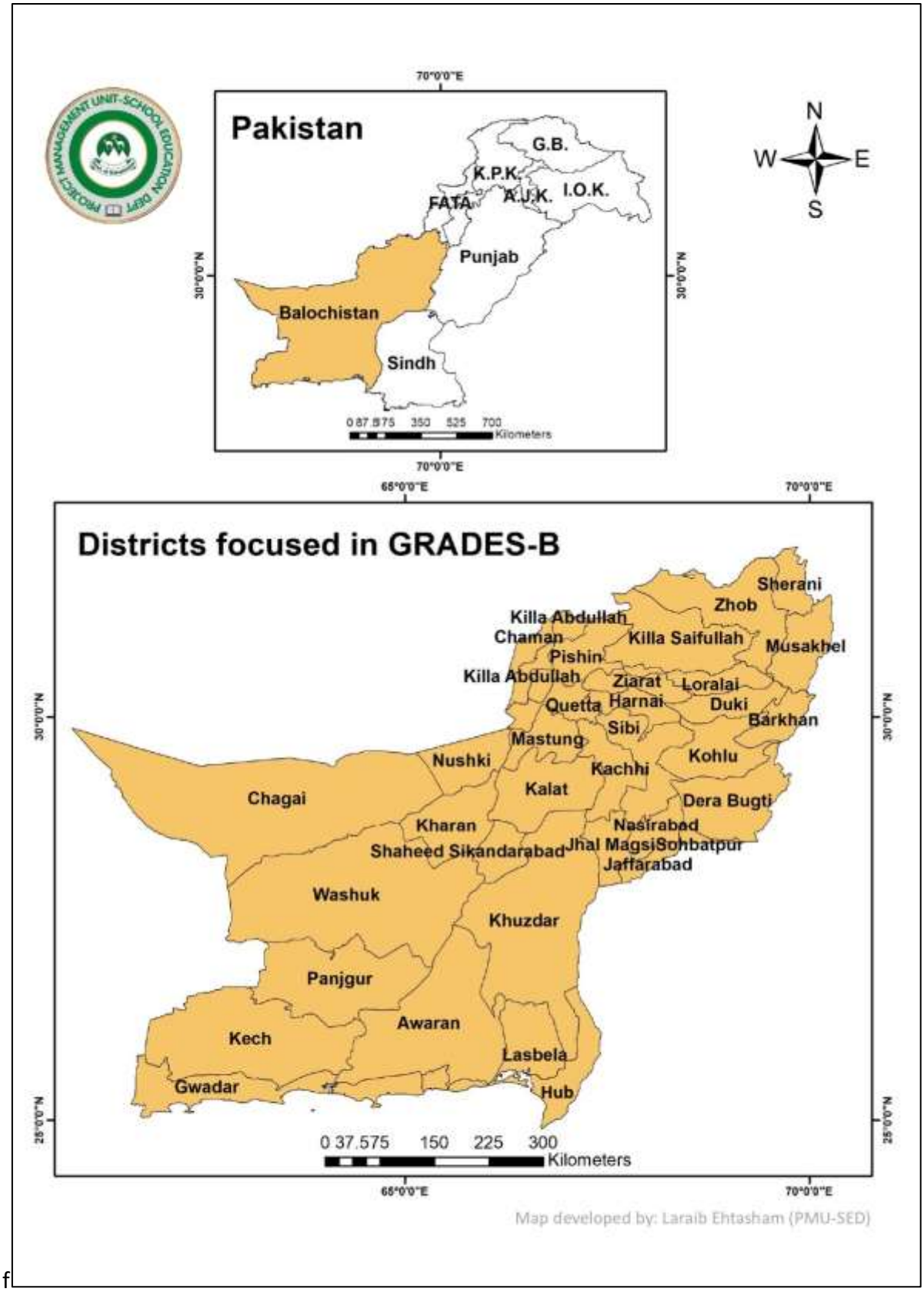
2. Project Description

The System Transformation of Early Education Project - Balochistan (STEP-B) and Getting Results: Access and Delivery of Quality Education Services in Balochistan (GRADES-B) aim to enhance access to equitable, inclusive, and quality education across Balochistan. These projects focus on addressing systemic challenges in early childhood and primary education while promoting sustainable institutional frameworks to improve education outcomes. The GRADES-B will be implemented throughout Balochistan, whereas, STEP-B will be implemented in 05 districts of the province (including Quetta, Pishin, Killa Abdullah, Chaman and Chagai). GRADES-B is broader in scope, addressing ECE and primary levels with a focus on access, quality, and system-wide reforms. On the other hand, STEP-B has a more targeted

approach, emphasizing quality ECE and primary education through curriculum enhancements, teacher training, inclusive practices, and sustainable infrastructure development.

STEP-B has been assigned a social, environmental, and SEA/SH risk rating of 'moderate', for an overall rating of 'moderate. Environmental risks are primarily associated with the construction and rehabilitation of classrooms, including air and noise pollution, waste management issues, and occupational health and safety risks. Social risks stem from the potential exclusion of marginalized groups, gender disparities, GBV and SEA/SH risks during construction and project activities, and potential risks to data privacy and security. SEA/SH risks are prevalent during construction due to the influx of male labor, and the project may also increase the risk of violence against children in schools. The project will implement mitigation measures to address these risks, including environmental and social management frameworks, codes of conduct, and capacity building on child protection issues.

GRADES-B has been assigned an environmental risk rating of 'moderate' and a social and SEA/SH risk rating of 'substantial'. Environmental risks are primarily associated with the construction and rehabilitation of classrooms, including air and noise pollution, waste management, and occupational health and safety risks. Social risks are generally moderate, including potential exclusion of marginalized groups, gender disparities (especially barriers to girls' education and women's employment), land acquisition issues, and risks to data privacy and security. However the social risk rating has been determined to be substantial due primarily to GBV and SEA/SH risks during construction and implementation of project activities. The substantial risks are related to the influx of male labor during construction, the potential for increased violence against children with increased enrollment, and the risks associated with the subsidized transport program for girls. The project will implement various mitigation measures to address these risks, including environmental and social management frameworks, codes of conduct, and capacity building on child protection issues. However, the prevailing security conditions and geographic remoteness of the project area may pose challenges for effective monitoring and oversight.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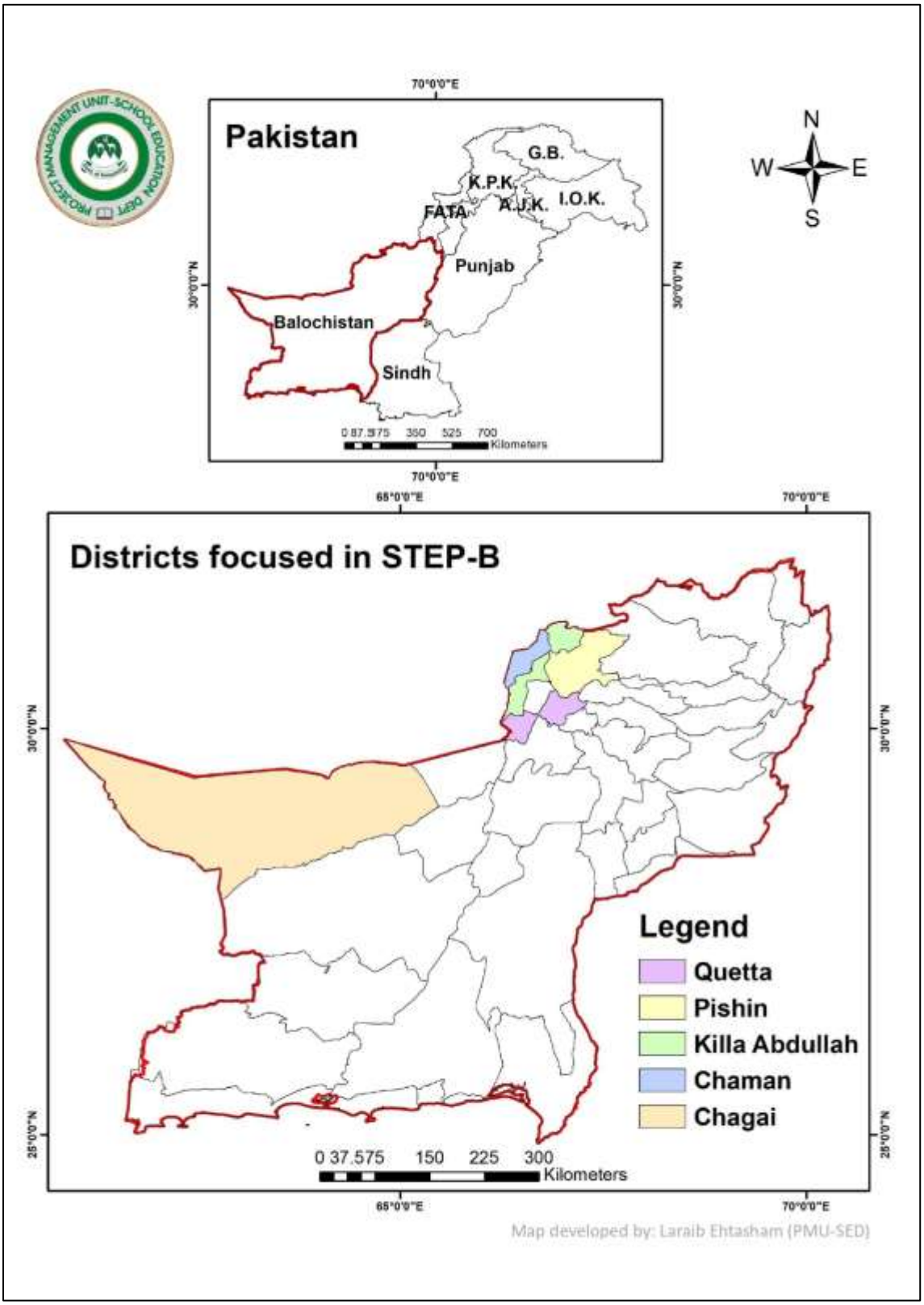
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Components of STEP-B: System Transformation of Early Education Project - Balochistan

1. **Enhancing Quality of Early Childhood and Primary Education**
    - **Curriculum Development:** Revise and enhance the Early Childhood Education (ECE) curriculum, making it inclusive, culturally relevant, and aligned with global best practices. Special attention will be given to gender responsiveness and disability inclusion.
    - **Teacher Training and Professional Development:** Design and implement a Continuous Professional Development (CPD) program for teachers, focusing on structured pedagogy, classroom management, and the use of innovative teaching techniques such as play-based learning.
    - **Learning Materials:** Provide age-appropriate, gender-sensitive teaching and learning resources to ensure quality classroom experiences.

This component ensures inclusivity and equitable access to quality education for marginalized groups, with a strong emphasis on gender equity and disability inclusion. The development of culturally relevant and inclusive materials also fosters environmental and social harmony.

2. **Expanding Access to Early Childhood Education**
    - **Infrastructure Development:**
        - Construct new ECE classrooms and rehabilitate existing ones in selected primary schools.
        - Improve WASH facilities and integrate climate-resilient features like solar energy systems and rainwater harvesting.
    - **Enrollment and Awareness Campaigns:**
        - Increase enrollment rates by conducting community-based outreach campaigns targeting out-of-school children (OOSC), with a focus on girls and children with disabilities.
        - Organize parental education programs to emphasize the importance of early childhood education and developmental milestones.

Infrastructure development will prioritize environmentally sustainable practices and accessibility for all children. Community-based campaigns will promote social inclusion, gender equality, and awareness of the importance of climate resilience.

3. **Monitoring, Evaluation, and Project Coordination**
    - **Data Systems:** Develop robust Education Management Information System (EMIS) modules to monitor student enrollment, teacher performance, and classroom outcomes.
    - **M&E Framework:** Establish an M&E framework with clear indicators to assess the effectiveness of interventions and ensure accountability.
    - **Stakeholder Engagement:** Facilitate ongoing consultations with communities and development partners to promote inclusive decision-making.

Strong monitoring systems and community engagement ensure transparency and accountability, enabling the identification and mitigation of potential environmental and social impacts.

Components of GRADES-B: Getting Results: Access and Delivery of Quality Education Services in Balochistan

1. **Supporting Education Reform and Results-Based Policies**
    - Introduce results-based policies to improve student learning outcomes in primary grades, focusing on literacy and numeracy skills.
    - Establish performance-based conditions (PBCs) tied to measurable educational outcomes, such as improved teacher attendance and increased enrollment rates for girls.

Such results-based interventions will include measures to reduce inequities, promote gender inclusion, and address potential barriers to access.

2. **Expanding Access and Equity in Education**
    - **Community-Based Schools:** Establish schools in remote and underserved areas to provide access to education for marginalized populations.
    - **Gender Equity Programs:**
        - Introduce scholarships to encourage female participation in the teaching workforce.
        - Provide subsidized transport services to enable girls to attend schools safely.

Initiatives under this component will enhance gender equity, promote social inclusion, and improve education access for vulnerable populations, reducing social disparities.

3. **Technical Assistance and Project Implementation Support**
    - Strengthen the institutional capacity of the Secondary Education Department (SED) by providing technical support, tools, and training for project management.
    - Conduct independent evaluations of project activities to ensure alignment with objectives and to inform policy decisions.

Strengthened institutional capacity ensures sustainable management of environmental and social risks, while independent evaluations enhance accountability and alignment with broader E&S goals.

4. **Contingent Emergency Response Component (CERC):**
    - Design a mechanism to provide a rapid response to emergencies, such as natural disasters or public health crises, ensuring minimal disruption to education services.

Emergency response measures will integrate environmentally sustainable practices and consider the needs of vulnerable groups to reduce social inequities during crises.

3. Environmental and Social Policies, Regulations, and Laws

3.1 Pakistan's Legal Framework

The national and provincial level policies, laws, and regulations of Pakistan and Balochistan respectively that are mentioned below. These are relevant and directly applicable to the projects' related activities/interventions and require to identify resulting environmental and social risks and impacts and to implement needed mitigation measures.

Table 1: Pakistan's Relevant Legal Framework

Law/Regulation	Description	Relevance to STEP-B GRADES-B Activities
Pakistan Environmental Protection Act (PEPA 1997)	Establishes a national framework for environmental conservation, pollution control, and sustainable development.	Guides compliance with national environmental policies during construction and rehabilitation of classrooms.

Environmental Protection (BEPA 2012)	Provincial law governing environmental management in Balochistan, including IEE/EIA requirements for certain projects.	Regulates environmental assessments and pollution control during construction, particularly for classroom expansion projects.
Pakistan Environmental Protection Agency Review of IEE and EIA Regulations, 2000	Specifies requirements for IEE/EIA based on project type and scale of impact.	Determines the need for IEE/EIA for classroom construction or rehabilitation projects based on their scale and impact.
National Environmental Quality Standards (NEQs)	Sets limits for air, water, noise pollution, and effluent discharge to ensure minimal environmental harm.	Relevant for controlling noise, air pollution, and waste discharge during construction and school operations.
Building Code of Pakistan (Seismic Provisions-2007)	Provides standards for seismic safety in construction projects in earthquake-prone areas.	Ensures structural integrity of school infrastructure to protect students and staff from earthquake-related risks.
Labor Laws (Employment of Child Act, 1991)	Prohibits child labor and ensures fair labor practices.	Prevents the use of child labor and promotes fair labor conditions during the construction phase.
Waste Management (BEPA 2012)	Regulates waste management practices, including collection, transportation, and disposal.	Controls the handling and disposal of construction and operational waste to prevent environmental harm.
Public Health (Emergency Provision Act, 1954)	Ensures measures to safeguard public health during emergencies.	Supports improvements in WASH facilities in schools to enhance hygiene and health outcomes for students and staff.
Land Acquisition Act (LAA 1894)	Governs land acquisition for public purposes and ensures fair compensation for affected owners.	Relevant for acquiring land for new classroom construction or school expansion, including voluntary land donation protocols.
Cultural Heritage (Antiquities Act, 1975)	Protects cultural and archaeological sites from destruction or unauthorized activities.	Ensures that construction activities do not disturb or damage nearby cultural or historical sites.
Water Resource Management (Balochistan Water and Sanitation Authority Act, 1989)	Regulates water usage and protects water resources from contamination.	Supports sustainable water use for WASH facilities and ensures no contamination occurs during project implementation.
Forest Conservation (Balochistan Forest and Wildlife Act, 2014)	Promotes conservation of forests and prohibits unauthorized deforestation.	Ensures compliance if any vegetation clearing is required near project sites.
Explosives Act, 1884	Governs safe handling, storage, and use of explosives.	Provides guidelines for any required blasting, though unlikely for school construction.

Factories Act, 1934	Focuses on worker health, safety, and welfare in industrial and construction settings.	Promotes occupational health and safety for workers employed during classroom construction or rehabilitation.
Groundwater Rights Administration Ordinance, 1978	Regulates sustainable groundwater extraction.	Guides water sourcing for construction and operational activities, avoiding over-extraction in water-scarce areas.
Balochistan Forest Regulations of 1890	Governs the management of forests in the public sector. Prohibits actions like felling or clearing for cultivation without permission.	Ensures that project interventions do not violate regulations related to the clearance of government-managed forests.
Balochistan Forest and Wildlife Act 2014	Protects wild animals and prohibits the hunting, killing, or capturing of protected species. Promotes sequestration of carbon through protected area management.	Ensures that project activities do not harm wildlife or protected areas, aligning with conservation goals.
Protection of Trees and Brushwood Act, 1949	Prohibits cutting or lopping of trees and brushwood without government permission.	Ensures compliance with tree protection during construction, with necessary permissions sought if clearing is unavoidable.
The Antiquities Act (1975)	Protects cultural resources like ancient products, historical sites, and monuments.	Ensures that construction activities avoid damaging any cultural or archaeological sites in the area.
The Public Health (Emergency Provision) Act 1954 & West Pakistan Epidemic Control Act 1958	Addresses public health emergencies, safeguards against disease spread, and ensures adequate medical services.	Supports improvements in WASH facilities in schools, ensuring health and hygiene during emergencies.
Constitution of Pakistan	Article 11 prohibits all forms of slavery, forced labor, and child labor. Article 17 provides a fundamental right to exercise freedom of association and the right to form unions. Article 25 lays down the right to equality and prohibition of discrimination on the basis of sex. Article 37e makes provisions for securing just and humane work conditions, ensuring that children and women are not employed in vocations unsuited to their age and sex, and for maternity benefits for employed women.	Provides constitutional basis for labor rights and prevention of child labor and forced labor.

Balochistan Occupational Health and Safety Act 2022	Establishes a framework for ensuring the health and safety of workers. Outlines the responsibilities of the employer and worker, and sets standards for workplace safety, establishes procedures for hazard identification and accident prevention, and includes specific requirements for workers in different sectors, including construction work.	Ensures that construction activities are implemented with good working conditions for labor, with clear procedures for handling incidents, conducting assessments, etc.
Balochistan Workers Compensation Act of 2022	Outlines the compensation framework for workers who suffer injuries or death due to accidents at the workplace. It specifies the employers liability, amount of compensation for various types of injuries, and the process for claiming compensation.	The Act guides the handling of incidents of injury or other bodily harm during the implementation of the project, particularly during the construction of new classrooms and ECE centers where workers may be exposed to various hazards.
Motor Vehicles Ordinance, 1965, and Rules, 1969	Governs the regulation of motor vehicles, licensing, and road safety.	Ensures compliance during transportation of materials and staff, promoting road safety.
Pakistan Penal Code, 1860	Addresses offenses affecting public or private property and human lives due to misconduct.	Ensures construction activities do not cause public nuisance or damage, coordinating with local authorities.
Provincial Local Government Ordinances, 2001	Regulates land use, pollution control, waste management, and public health.	Ensures compliance with provincial regulations during rehabilitation and operation of school and hospital facilities.
Balochistan Water and Sanitation Authority Act, 1989	Establishes authority over water and sanitation systems to prevent contamination.	Ensures compliance with water management regulations during construction and operational phases.
Balochistan Culture Heritage Preservation Act, 2010	Protects cultural heritage sites and imposes punitive actions for their destruction.	Ensures no harm to cultural heritage sites in project areas, aligning with conservation efforts.
Land Acquisition Act 1894	Governs land acquisition and compensation procedures for public purposes.	Applies to any land acquisition required for classroom or school expansions, ensuring compensation and compliance with voluntary land donation protocols.

3.2 National Environmental and Social Assessment and Permitting

The Pakistan Environmental Protection Act (PEPA) 1997 serves as the principal environmental legislation in Pakistan. It outlines measures for environmental protection, conservation, rehabilitation, and

improvement, along with pollution prevention and sustainable development. Following the 18th Amendment, the Government of Balochistan adapted PEPA 1997 with amendments, renaming it the Balochistan Environmental Protection Act (BEPA) 2012. This act provides the framework for implementing environmental reforms, protecting species, conserving renewable resources, establishing environmental tribunals, appointing environmental magistrates, and mandating environmental assessments for new developments. Additionally, it emphasizes pollution control and the promotion of sustainable practices within the province.

The Balochistan Environmental Protection Agency (BEPA), established in 1992, oversees the implementation of BEPA. Functioning under the administrative control of the Environment, Wildlife, Livestock, and Tourism Department, BEPA holds the authority to investigate environmental law violations either on its own initiative or through registered complaints.

Under Section 15 of BEPA, no development project involving construction or physical environmental changes may proceed without an Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA), which must be approved by federal or provincial Environmental Protection Agencies. This requirement applies to projects specified in the Pakistan Environmental Protection Agency Review of IEE and EIA Regulations (2000).
The 2000 Regulations classify projects based on their potential environmental impact:

- Schedule-I projects, which have a lower environmental impact, require an IEE.
- Schedule-II projects, with potentially higher environmental impacts, necessitate an EIA.

3.3 World Bank Standards and Key Gaps with the National Framework

This ESMF caters for both GRADES-B and STEP-B projects, hence both projects will follow the World Bank Environmental and Social Standards (ESSs), as well as the World Bank Group Environmental, Health and Safety Guidelines. The World Bank's environmental and social standards applicable to both project activities are summarized in the table below:

Table 2: Relevant World Bank ESS and Key Gaps with the National Framework

STEP-B	
E&S Standard	Relevance with STEP-B
1. Assessment and Management of Environmental and Social Risks and Impacts (ESS1)	ESS1 is relevant for STEP-B because project activities, such as school rehabilitation and teacher training, involve moderate environmental risks (e.g., waste and pollution during construction) and substantial social risks (e.g., lack of access for vulnerable groups). As the precise location and design of projects' activities are not known at the appraisal stage, a framework approach is/would be adopted for E&S assessment. As a result of this assessment an Environmental and Social Management Framework (ESMF) has been developed.
2. Labor and Working Conditions (ESS2)	ESS2 is relevant as STEP-B involves the employment of teachers and workers for school rehabilitation. Labor risks include OHS concerns (e.g., accidents during construction), potential child labor, and inadequate employment terms. Labor Management Procedures (LMP) will address these risks with clear guidelines and grievance mechanisms.

3. Resource Efficiency and Pollution Prevention and Management (ESS3)	ESS3 is relevant because construction and rehabilitation activities under STEP-B may generate waste and increase water and energy usage. Climate-resilient designs will minimize these impacts.
4. Community Health and Safety (ESS4)	ESS4 is relevant due to risks to communities from construction activities (e.g., noise, dust, and traffic accidents). Measures to ensure the safety of children and teachers during construction will be implemented.
5. Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement (ESS5)	Not currently relevant, as STEP-B activities are expected to use existing school land.
6. Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6)	Not relevant, as activities are limited to existing school premises and urban areas with minimal biodiversity concerns.
7. Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (ESS7)	Not relevant, as there are no recognized Indigenous Peoples in the project area.
8. Cultural Heritage (ESS8)	ESS8 is relevant as rehabilitation activities may affect local cultural heritage. Mitigation measures, including a Chance Finds Procedure, will be included in project documents.
9. Financial Intermediaries (ESS9)	Not relevant, as the project does not involve financial intermediaries.
10. Stakeholder Engagement and Information Disclosure (ESS10)	ESS10 is relevant for STEP-B as engaging with communities, teachers, and local governments is crucial for successful project implementation. A Stakeholder Engagement Plan (SEP) will ensure consultations, information sharing, and grievance redress.
GRADES-B	
E&S Standard	**Relevance with GRADES-B**
1. Assessment and Management of Environmental and Social Risks and Impacts (ESS1)	ESS1 is relevant for GRADES-B because project activities, including classroom construction and transport initiatives, pose moderate environmental risks (e.g., waste generation, noise pollution, resource use) and substantial social risks (e.g., gender-based exclusion, involuntary resettlement, and marginalized community access challenges). The Environmental and Social Management Framework (ESMF) will guide risk screening and mitigation.
2. Labor and Working Conditions (ESS2)	ESS2 is relevant for GRADES-B as project activities include classroom construction and the use of community labor. Labor risks involve occupational health and safety (OHS) concerns (e.g., construction accidents, exposure to hazardous materials), risks of child labor in remote areas, and inadequate terms of employment. The Labor Management Procedures (LMP) will address these issues, including provisions for worker training and grievance mechanisms.
3. Resource Efficiency and Pollution Prevention and Management (ESS3)	ESS3 is relevant because GRADES-B construction activities may increase waste production (e.g., construction debris), energy consumption, and water usage. Climate-smart features, such as solar

	panels and rainwater harvesting, will be integrated to reduce environmental impacts. Mitigation measures will be incorporated in the ESMF.
4. Community Health and Safety (ESS4)	ESS4 is relevant due to risks to communities from construction activities (e.g., noise, dust, and accidents) and transport safety concerns, especially for girls. Design and operation plans will include measures to ensure community safety, disability access, and emergency preparedness.
5. Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement (ESS5)	ESS5 is relevant as GRADES-B may require small-scale land acquisition for classroom expansions or new facilities. The ESMF will include a Resettlement Policy Framework (RPF) to manage any land donation or acquisition impacts, ensuring voluntary and documented land use agreements.
6. Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6)	Not currently relevant, as GRADES-B construction will primarily occur on existing school premises. However, impacts on local vegetation and ecosystems will be considered under ESS1.
7. Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (ESS7)	Not relevant, as there are no recognized Indigenous Peoples in the project area.
8. Cultural Heritage (ESS8)	ESS8 is relevant because construction activities may inadvertently affect cultural heritage sites. A Chance Finds Procedure will be included in the ESMF to mitigate risks to cultural or historical artifacts.
9. Financial Intermediaries (ESS9)	Not relevant, as the project does not involve financial intermediaries.
10. Stakeholder Engagement and Information Disclosure (ESS10)	ESS10 is relevant as GRADES-B requires significant engagement with rural parents, teachers, NGOs, and community leaders, especially to address barriers to girls' education. A Stakeholder Engagement Plan (SEP) will ensure inclusive consultations and grievance mechanisms, particularly in remote areas.

GRADES-B Project

Potential Environmental and Social Risk Impacts and Standard Mitigation Measures

Table 3: Environmental and Social Risks and Mitigation Measures – Design Phase

Subcomponent Activity	Risks and Impacts	Mitigation Measures
Development of ECE Curriculum (STEP-B and GRADES-B)	Curriculum may not be culturally appropriate, or inclusive of all disabilities.	Conduct extensive consultations with communities, parents, and sector experts to ensure the curriculum is

	Lack of community input in ECE program design	inclusive and appropriate for the varying socio-cultural contexts in the province. Pilot test curriculum, making adjustments as needed prior to province-wide rollout
Introducing double shifts in schools (GRADES-B)	Increased student enrollment due to introduction of double shifts could put additional strain on existing (potentially constrained) school infrastructure and services, including water, sanitation, waste management. The increase in student populations could put additional pressure on teachers	Conduct thorough needs assessments to determine appropriate school capacity for double shifts. Ensure adequate WASH facilities are in place before implementing double shifts in each school Provide adequate support and training for teachers to manager the potential increase in enrollment.
Public-private partnerships (GRADES-B)	Potential for private sector partners to prioritize profits over quality education, or to exclude vulnerable groups Lack of transparency and accountability in PPP arrangements	Enter into clear contractual agreements with PPP partners that ensure the prioritization of quality, equitable, and inclusive education. Develop and implement strong monitoring mechanisms to ensure compliance with contractual agreements Ensure transparency in PPP selection Conduct consultations with communities to address concerns and build support for PPPs
Climate-smart classrooms (GRADES-B)	Selection of inappropriate construction materials, or oversights in design process may lead to increased environmental impacts (e.g. high energy consumption, damage to ecosystems). Classroom designs could overlook the needs of children with disabilities, and children from other vulnerable groups	Conduct thorough environmental and social screenings to identify suitable construction materials and inclusive, environmentally friendly designs Prioritize locally sourced, sustainable materials and energy efficient designs Ensure consideration of accessibility standards for all new designs.
Strengthening parental engagement (GRADES-B)	Design of parental engagement programs may not be culturally appropriate, or may not be	Develop the parental engagement programs in consultation with local communities, and ensure that the

	inclusive for parents from vulnerable groups Potential for reinforcing traditional gender roles by excluding women from engagement activities	programs are culturally sensitive as appropriate given the varied socio-cultural contexts in Balochistan. Ensure that engagement programs are designed to be inclusive by default. This may potentially involve designing and conducting dedicated engagement programs tailored to women, minorities, and other vulnerable groups. Use a diverse combination of strategies and modes to engage parents, as directed by the Stakeholder Engagement Plan.
Transportation for girls (GRADES-B)	Inadequate planning for transportation routes could expose girls to safety risks or lead to inefficient use of resources Available transportation service providers, especially in rural areas, may not be reliable or may not meet the specific needs of girls Potential for increased financial burden on families if subsidy on transportation costs is not priced appropriately, leading to underutilization of transportation services.	As part of environmental and social screening (including development of ESMPs, if required), ensure that safety of proposed transportation routes is assessed. Consultations with communities and students to ensure that local knowledge is not overlooked in designing transportation routes Establish clear safety protocols and monitoring mechanisms for transportation providers, and ensure that clear contractual agreements are in place with all providers. Ensure that transportation service providers are selected on the basis of reliability, and suitability for girls' needs. Conduct a needs assessment to determine the appropriate subsidy to avoid any additional financial burdens on families.
Continuous professional development for teachers (STEP-B)	Design of teacher training programs may not be effective in improving teaching practices, or may not be inherently inclusive	Ensure that teacher training programs are inclusive and of high quality, and developed in consultation with sector experts and education professionals in the region.

	Lack of ongoing support and mentoring for teachers after training Inadequate training on child protection and safeguarding	Ensure that training programs are accessible to all teachers, including those in remote areas Design mechanisms for continuous professional development and peer learning that can continue after training programs have concluded. Include comprehensive training on child protection and safeguarding in all CPD programs for teachers
ECE classrooms (STEP-B)	Selection of inappropriate locations for ECE centers (e.g. far from communities, unsafe or poorly accessible areas, etc) Inadequate consideration of water and sanitation needs in the ECE center design Lack of community ownership in the selection and design of ECE centers	Conduct thorough assessments of potential ECE center sites to ensure that they are located in safe and accessible areas Assessments should also estimate the water and sanitation requirements (including magnitude of facilities, and types of accessibility features) of each ECE facility, commensurate with the expected student body size, and specific needs of the students. Regularly engage with host communities during the design phase to ensure that their needs are met, and that their concerns are addressed.
Parental awareness and enrollment campaigns (STEP-B)	Campaigns may rely too heavily on traditional media, and may not reach communities in remote areas or with limited literacy. Messages may be presented in a way that does not align with the values and priorities of the communities Lack of follow up and engagement with parents after the initial campaigns.	Implement the SEP throughout the project, ensuring that the guidance on communication preferences of communities is followed. Use a variety of communication channels as directed by the SEP. Develop messaging in consultation with communities, or with organizations that work closely with the communities to ensure that they are culturally appropriate, and relevant to the priorities of the community. Regular engagement with parents through community meetings, parent

		teacher associations, and other platforms.
EMIS modules (STEP-B)	EMIS modules may not be suitably design to capture data on key indicators related to equity and inclusion Lack of capacity within the implementing and associated agencies to effectively analyze and learn from the EMIS data	Ensure that EMIS modules capture data on key indicators related to gender, disability, and other characteristics, especially of vulnerable populations Provide training and support for education officials on data analysis and its use for decision making.
Evaluation of CPD model (STEP-B)	Evaluation may not be designed to capture the long-term impacts of CPD on teaching practices and student learning outcomes. Lack of mechanisms to use evaluation findings to improve CPD programs.	Evaluations will be designed to capture both short and long-term impacts of CPD Clear mechanisms will be established to use evaluation findings to adapt and improve CPD programs

Table 4: Environmental and Social Risks and Mitigation Measures – Implementation phase

Subcomponent Activity	Risks and Impacts	Mitigation Measures
All activities (STEP-B and GRADES-B)	Exclusion of marginalized communities due to: Geographic isolation – remote communities may lack access to information about project activities due to limited transportation infrastructure, communication channels. Socioeconomic disadvantage – poor communities and those belonging to vulnerable/marginalized groups such as ethnic/religious/tribal minorities and refugees may be unable to access project information due to poverty, low literacy, and limited resources.	Targeted outreach campaigns using diverse channels, and in appropriate formats for reaching marginalized communities. Ensuring meaningful, targeted consultations with these groups throughout project preparation and implementation. Including activities in the overall project M&E protocol to ensure that data is collected specifically to monitor project reach and impact on these marginalized communities.

	Discrimination – These communities may face discrimination, limiting access to education and project benefits Lack of trust – historically marginalized communities may be particularly inclined mistrust government projects and initiatives.	
All activities (STEP-B and GRADES-B)	Project activities, such as construction of new facilities, change in school schedules, and increasing enrollment could increase the risk of GBV and violence against children, particularly in contexts where existing protection mechanisms are weak. Students, teachers, and community members may not be aware of how to identify, report, or respond to incidents of GBV or VAC. Schools and communities may lack adequate response mechanisms for responding to and addressing incidents of GBV and VAC, leading to further harm. Construction and demolition activities pose serious risks, including worker injuries from unsafe conditions, lack of PPE, or untrained labor. Exposure to hazardous materials like asbestos and lead paint during demolition can cause long-term health issues. Labor Management risks such as child/forced labor and contractor exploitation further compound these dangers.	Develop and implement comprehensive child protection policies and procedures in all project activities, including construction sites and in schools supported by the project once operational, especially in community schools where administrative oversight may be weaker than in government public schools. Conduct awareness raising campaigns and trainings on GBV and VAC for students, teachers, and community members. Campaigns and training should provide information on identifying, reporting, and responding to incidents, especially using the project GRM. Establish as part of the GRM, a clear and confidential reporting and referral system for receiving and responding to incidents of GBV and VAC, and ensure access to support services for survivors. Establish as part of the C-ESMP, a comprehensive OHSMP to ensure that OHS provisions are adequately followed during the construction activities and an emergency preparedness plan including evacuation and first aid SOPs. Integrate the LMP provisions into the works contract and ESMP/C-ESMP as per the local regulations and ESS-2 to prohibit child/forced labor.

	Unauthorized site access by children or community members increases injury risks, while air and noise pollution negatively impact nearby residents' health and wellbeing. Strict safety measures, proper training, oversight, and community protections are essential to address these risks.	Integrate CHS provisions into the C-ESMP including traffic management plan to mitigate any adverse impact on nearby communities
Parenting Awareness and Community Workshops (STEP-B)	Exclusion of illiterate or marginalized parents from engagement. Resistance to behavioral changes or skepticism towards program benefits.	Organize workshops in local languages using culturally sensitive materials, with visual aids for illiterate participants. Partner with trusted community leaders to advocate for the program. - Conduct door-to-door outreach in remote areas to ensure participation. Offer flexible workshop schedules (e.g., evening sessions) to accommodate parents' availability. Collect feedback through pre- and post-session evaluations to measure effectiveness and refine future activities.
Education Data Management Systems (Both Projects)	Risks to data privacy and security for teachers, students, and parents. Inequitable data reporting due to lack of capacity in remote schools.	Adhere to national and international data protection standards (e.g., encryption, secure access protocols). Conduct capacity-building workshops for school staff on data entry, accuracy, and security practices. Design EMIS platforms to accommodate low-tech environments, ensuring usability in rural schools. Include a grievance mechanism for stakeholders to report misuse or inaccuracies in the system. Conduct independent audits of data systems to identify vulnerabilities and propose solutions.

Procurement of Teaching Materials (Both Projects)	Environmental risks related to production and disposal of teaching materials. Exclusion of gender-sensitive or disability-friendly materials.	Procure eco-friendly and durable materials to minimize waste and environmental impact. Include gender and disability experts in the procurement process to ensure inclusivity. Develop guidelines for safe and sustainable disposal or recycling of outdated materials. Conduct awareness sessions for teachers and administrators on the importance of inclusive teaching aids. Monitor distribution processes to prevent exclusion of underserved schools.
Teacher Recruitment and Capacity Building (GRADES-B)	Barriers to hiring qualified female teachers, particularly in rural areas. Inadequate training on child protection, GBV prevention, or inclusive teaching. Traditional gender roles and biases could lead to the exclusion of women from employment opportunities as teachers, particularly in communities where there are cultural restrictions on women's roles outside the home. Women from marginalized communities and vulnerable groups may also be excluded from employment opportunities.	Offer targeted recruitment campaigns in rural and underserved areas with additional support (e.g., scholarships, travel allowances). Provide in-depth training for teachers on GBV/SEA/SH prevention and response mechanisms. Incorporate modules on inclusive teaching methods, including special education strategies. Monitor teacher retention rates and provide professional development opportunities to sustain engagement. Partner with local teacher associations to improve outreach and recruitment diversity.
Community Schools Establishment (GRADES-B)	Land acquisition and resettlement issues. Potential conflicts within communities regarding school placement.	Utilize government-owned land wherever possible to avoid resettlement. If voluntary land donations are necessary, ensure a transparent process documented in accordance with ESS5 requirements.

		Engage communities through participatory planning to address concerns and select optimal school locations.
WASH (Water, Sanitation, and Hygiene) Facilities in Schools (Both Projects)	Risks of water scarcity in arid regions. Poor maintenance leading to unsafe or unsanitary conditions. Exclusion of disability-friendly WASH facilities. Poor management of WASH effluent	Incorporate rainwater harvesting systems and water-efficient fixtures to address water scarcity. Train school staff and students on proper maintenance and hygiene practices. Ensure WASH infrastructure adheres to universal design principles (e.g., wheelchair-accessible toilets). Include regular monitoring of WASH facilities as part of project evaluation frameworks. Partner with local NGOs for behavior change campaigns on hygiene awareness. Management of WASH infrastructure will be included in the Waste Management Plan and will follow international best practices
Safe and affordable school journeys for girls (GRADES-B)	Road and traffic safety issues may impact the safety and well-being of girls using the services Increased risk of incidents of harassment and GBV due to contact between transportation providers and girl students Community resistance to transportation activities due to cultural norms, or concerns about safety of girls traveling alone	Transportation service providers participating in the project should be screened prior to on-boarding to ensure road-worthiness of vehicles Drivers will be trained regularly throughout the duration of the project on traffic rules, road safety, and child safeguarding Project monitoring should include regular safety monitoring to track traffic incidents, conduct regular vehicle inspections, and ensure adherence to safety protocols A safeguarding officer may be nominated from the community or the school administration to accompany girls on journeys

		All transportation service providers should be required to sign a code of conduct before participating in the project. The code of conduct should include commitments to vehicle maintenance, driving practices, and child safeguarding. Regular engagement with communities to ensure that their concerns regarding school transportation are addressed
Monitoring and evaluation activities (both projects)	Geographic isolation, difficult terrain, and lack of infrastructure in remote areas may hinder access for M&E staff, leading to incomplete data collection and potential exclusion of remote communities from project assessments and evaluations. Security concerns in areas with active conflict and/or instability may pose safety risks to M&E staff, limiting their ability to travel to project sites and conduct field visits, resulting in data gaps and inadvertent biases in M&E outputs.	The projects will utilize a variety of data collection methods to overcome accessibility challenges in remote areas. This may include measures such as community-based monitoring, collaborations with local organizations and community groups, etc. The project will conduct, as needed, thorough security assessments prior to field visits and will provide the necessary safety training and equipment for M&E staff.
Construction and rehabilitation activities for ECE classrooms and climate smart classrooms (both projects)	Construction works may cause removal of trees, which may cause destabilization of causing potential land slides and erosion especially in hilly areas Construction activities, movement of vehicles, land excavation, structure demolitions, and onsite stacking of construction materials may lead to dust emissions and prolonged suspension of fine particulates and harmful gases in the ambient environment	The projects will aim to minimize the removal of trees during the construction of ECE centers and classrooms. Where tree removal is necessary, the project will plant 5 trees for every tree removed. Agreements with construction contractors will include requirements for managing airborne particulate emissions, including but not limited to: covering stockpiled materials, implement speed limits for construction vehicles on site, proper maintenance of vehicles and machinery, regular water sprinkling. Contractors will also be required to carry out regular air quality

	Use of machinery during construction can cause unpleasant noise, posing a nuisance to nearby communities General construction waste generation including cement bags, wood, glass, etc. If improperly disposed, this waste could potentially contaminate local water resources and ecosystems. Disposal of construction waste such as leftover concrete, paint, leftover oil, and other wastes may lead to soil contamination Construction activities may use large quantities of water, generate wastewater, and may contaminate or otherwise constrain the availability of local water resources Construction activities may pose safety risks to nearby communities Accidents, injuries, or fatalities on construction sites due to incomplete safeguards for workers for electric, fire and fall hazards, inadequate PPEs availability at site, or lack of proper emergency plan, and lack of training. Exposure of labor to hazardous materials during demolition or renovation Use of child labor, forced labor, or unsafe labor practices by contractors	testing to ensure that Air quality levels are within the limits of the NEQS. During construction, the use of noise-making machinery and vehicles will be limited during night hours. Contractors will also minimize the use of horns on-site, and be required to provide regular vehicle maintenance reports to the project management. The Project will prepare and disclose a Waste Management Plan which will contain guidance on the management and proper disposal of construction waste. Contractors and labor will be required to minimize water usage during construction activities. Drinking water in construction area will be periodically tested for timely detection of any construction related contaminants Construction sites will be clearly demarcated, with boundaries to prevent unauthorized individuals from entering the site. Clear warning signage will be posted around the perimeter of the site. Contractors and labor will be trained on construction best practices, including standards for working conditions, the use of PPEs, etc. An emergency preparedness plan to deal with medical emergencies will be prepared. These trainings will be conducted regularly throughout construction. Individuals under the age of 18 will not be permitted to engage in construction work. Contractors will verify the age of all labor via CNIC. Existing infrastructure will be mapped out prior to beginning construction with

	Accidental damage to existing infrastructure, e.g. water pipes, power lines, etc	the support of the utility providers to avoid damage to existing infrastructure and utilities.

4.1 Risks and Mitigation Measures Specific to Disadvantaged and Vulnerable Groups

Disadvantaged and Vulnerable Groups

The GRADES-B and STEP-B projects aim to improve education in Balochistan, but certain groups may face specific risks or barriers to benefiting from the projects. These groups[1] include: school-going girls, out-of-school children, children with disabilities and their families, minority ethnic and religious groups, and female teachers. The projects recognize the importance of addressing the unique needs and challenges faced by these groups. Specific risks and mitigation measures for each group are outlined below:

School-going girls

Girls attending schools face the risk of exclusion from educational opportunities due to cultural norms, early marriages, or safety concerns especially during travel to and from school. The projects will conduct comprehensive stakeholder engagement to minimize the risk of girls' exclusion, and will continue engaging with communities and other stakeholder throughout the life of the project. Beneficiary identification will specifically target girls during the outreach activities. Transportation services provided under the projects will be designed in cooperation with communities, to ensure that their concerns are addressed. Service providers will be required to sign a code of conduct and will be trained on traffic safety and child safeguarding. The projects may also explore the option of nominating a safeguarding officer with the endorsement of the community to accompany girls to and from school.

Out of school children

OOS children may already be facing exclusion from educational opportunities due to poverty, lack of access, or a combination of other socioeconomic factors such as cultural/social norms, religious and ethnic status, etc. The projects in their design aim to specifically target OOS children through Component 1 of STEP-B and Component 1 PBC 3 for GRADES-B. Both components will specifically target out of school children, aiming to improve access to schools and build community ownership.

Children with disabilities and their families

These children may face exclusion from education due to physical constraints to accessing schools, and prevailing social/cultural attitudes towards special education. In the project design, STEP-B focuses on disability inclusiveness in the development of the ECE curriculum, ensuring that the curriculum take into consideration the needs of students with disabilities. In terms of implementation, the designs of the new ECE centers and climate smart classrooms will ensure accessibility for students with physical disabilities, including the provision of ramps, handicapped toilets, and other features. Parents of disabled children with be specifically engaged with throughout the project implementation, especially for the formation of parent teacher and school management committees. Information disclosed by the project will be provided in accessible formats as directed in the SEP.

Students and families belonging to ethnic and/or religious minority groups

This group may be excluded from project benefits due to cultural and social attitudes towards them. They may also face language barriers and discrimination, limiting their access to education and project benefits.

To mitigate this, the project will ensure that learning materials developed, as well as all project communication is designed to be culturally and religiously appropriate. Communications materials will be translated into local languages, and outreach activities with parents, teachers, and communities will focus on and promote inclusive education practices that value diversity and respect cultural identity.

Female teachers

Female teachers often have limited access to professional development opportunities, and may also face safety and mobility constraints, and gender-based discrimination both in and out of the workplace. The projects will provide targeted professional development opportunities for female teachers, including training on gender responsive pedagogy. It will also address safety and mobility constraints by providing safe transportation options and promoting gender sensitive school environments. A GBV Action plan will be prepared and disclosed prior to project implementation which will assess GBV/SEA/SH related risks in more detail, and provide specific mitigation measures to be implemented along with the projects.

4.2 Comprehensive Planning and Design Considerations

1. **Infrastructure Design:**
    - Prioritize site selection in consultation with communities to avoid conflicts and resettlement.
    - Adopt disaster-resilient designs incorporating flood-resistant materials and energy-efficient systems.
    - Ensure universal accessibility in all physical infrastructure.
2. **Environmental Safeguards:**
    - Plan for sustainable resource use (e.g., solar panels, water recycling systems) during construction and operation phases.
    - Implement biodiversity conservation measures if project sites are near sensitive ecosystems.
    - Prepare and implement site-specific ESMPs which will include detailed measures for mitigation of environmental risks
    - Prepare and implement site specific Waste Management Plans which will include details on siting of disposal areas, best practices for storage and handling of waste, and guidance on safe disposal.
3. **Community Engagement:**
    - Implement the SEP throughout the design and implementation stages of the project, updating it regularly as needed. The SEP provides a mapping of stakeholders identified aligned with ESS10, and provides guidance on engaging them.
    - Conduct early and inclusive stakeholder consultations to build trust and gain local insights. Thereafter amend project design as required to ensure that the needs of stakeholders are met.
    - Develop grievance redress mechanisms to address disputes or dissatisfaction proactively.
4. **Training and Awareness:**
    - Integrate safety and emergency preparedness training into teacher capacity-building programs.
    - Include awareness sessions on environmental sustainability and gender inclusivity.
5. **Emergency Preparedness:**
    - Establish protocols for managing risks like natural disasters, water shortages, or disease outbreaks in school settings.

- Train school staff and community volunteers on emergency response measures.

6. **Conflict Sensitivity:**
   - Project design will consider potential conflict risks and incorporate suitable mitigation measures to avoid exacerbating existing tensions or creating new conflicts
7. **GBV/SEA/SH:**
   - Prepare and implement a comprehensive GBV Action Plan. The Plan shall be prepared prior to implementation, and will be implemented throughout the lifetime of the project.

4. Procedures and Implementation Arrangements

5.1 Environmental and Social Risk Management Procedures

The environmental and social risk management procedures will be implemented through the Project's subproject selection process. In summary, the procedures aim to do the following:

Table 5: Project Cycle and E&S Management Procedures

Project Stage	E&S Stage	E&S Management Procedures
a. Assessment and Analysis: Subproject Identification	**Screening**	- During subproject identification, ensure subproject eligibility by referring to the Exclusion List in Table 5. - For all activities, use the Screening Criteria in Annex 1 to identify and assess potential environmental and social risks and impacts, and identify the appropriate mitigation measures for the subproject. - Identify the documentation, permits, and clearances required under the government's Environmental Regulation.
b. Formulation and Planning: Planning for subproject activities, including human and budgetary resources and monitoring measures	**Planning**	- Based on Screening Criteria, adopt relevant environmental and social procedures and plans. - For activities requiring Environmental and Social Management Plans (ESMPs), submit initial ESMPs from each district for prior review and no objection by the World Bank prior to initiating bidding processes (for subprojects involving bidding processes) and/or launching activities (for subproject activities not subject to bidding). The clearance of subsequent ESMPs will be delegated to the Project Management Unit's Environmental and Social Management Unit (PMU-ESMU) once its capacity meets the satisfactory standards as per World Bank requirements, however the World Bank E&S team will sample review the ESMPs for due dilligence. - Ensure that the contents of the ESMPs are shared with relevant stakeholders in an accessible manner and consultations are held with the affected communities in accordance with the SEP.

		- Complete all documentation, permits, and clearances required under the government's Environmental Regulation. - Train staff responsible for implementation and monitoring of plans. - Incorporate relevant environmental and social procedures and plans into contractor bidding documents; train contractors on relevant procedures and plans.
c. Implementation and Monitoring: Implementation support and continuous monitoring for projects	**Implementation**	- Ensure implementation of plans through site visits, regular reporting from the field, and other planned monitoring activities. - Track grievances/beneficiary feedback and ensure effective resolution. - Continue awareness raising and/or training for relevant staff, volunteers, contractors, communities, and stakeholders. - Contractors will be responsible for implementing the mitigation measures in the E&S risk management documents with oversight by the E&S Safeguard Officer.
d. Review and Evaluation: Qualitative, quantitative, and/or participatory data collection on a sample basis	**Completion**	- Assess whether the environmental and social management plans (ESMPs) have been effectively implemented. - Ensure that physical sites are properly restored to their pre-project conditions, particularly for construction-related activities. - Review the final status of compliance with the E&S risk management measures and submit a completion report to the World Bank. - Resolve any pending environmental and social issues before considering the subproject as fully completed.

More detail for each stage is provided below.

a. Subproject Assessment and Analysis – E&S Screening

As a first step, all proposed activities should be screened to ensure that they are within the boundaries of the Project's eligible activities, and they are not considered as activities listed on the E&S Exclusion List in the table below.

Table 6: Exclusion List

	• Any construction in protected areas or priority areas for biodiversity conservation, as defined in national law

- Activities that have the potential to cause any significant loss or degradation of critical natural habitats, whether directly or indirectly, or which would lead to adverse impacts on natural habitats
- Construction in areas prone to natural hazards, such as floodplains, earthquake zones, or unstable slopes, without adequate mitigation measures
- Use of construction materials that are harmful to the environment or human health, such as asbestos, lead-based paints, or unsustainable timber.
- Purchase or use of banned/restricted pesticides, insecticides, herbicides, and other dangerous chemicals (banned under national law and World Health Organization (WHO) category 1A and 1B pesticides)
- Any activity affecting physical cultural heritage such as graves, temples, churches, historical relics, archeological sites, or other cultural structures
- Activities that may cause or lead to forced labor or child abuse, child labor exploitation or human trafficking, or subprojects that employ or engage children, over the minimum age of 14 and under the age of 18, in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development
- Any activity on land that has disputed ownership or tenure rights
- Any activity that will cause physical relocation of households or will require the use of eminent domain
- Any activity with significant environmental and social risks and impacts that require an Environmental and Social Impact Assessment (ESIA)
- Any activity that will require Free, Prior and Informed Consent (FPIC) as defined in ESS7.]
- Any activity that would disproportionately benefit or disadvantage certain groups based on gender, ethnicity, religion, or socioeconomic status
- Any activity that would violate the rights of marginalized and vulnerable groups

As a second step, the E&S Safeguard Officer will use the ***E&S Screening Table in Annex 1*** to identify and assess relevant environmental and social risks specific to the activities, and identify the appropriate mitigation measures. The *Screening Form* lists the various mitigation measures and plans that may be relevant for the specific activities (such as the Environmental and Social Codes of Practice, the Environmental and Social Management Plan, the Labor Management Procedures, Chance Find Procedures, etc.)

The E&S Safeguard Officer will also identify the documentation, permits, and clearances required under the government's Environmental Regulation.

b. Subproject Formulation and Planning – E&S Planning

Based on the process above and the Screening Criteria (Annex 1), the PMU will adopt the necessary environmental and social management measures already included in the Annexes of this ESMF (such as the ESCOPs, the LMP, etc.) or develop relevant site-specific environmental and social management plans.

If site-specific ESMPs are necessary, the [responsible party in the implementing agency] will prepare these ESMPs and other applicable documents as needed. The PMU will provide approval and compile ESMPs and other applicable forms. The contents of the ESMPs will be shared with relevant stakeholders in an accessible manner, and consultations will be held with the affected communities on the environmental and social risks and mitigation measures. If certain subprojects or contracts are being initiated at the same time or within a certain location, an overall ESMP covering multiple subprojects or contracts can be

prepared. Some moderate risk subprojects may also benefit from the preparation of a site-specific environmental and social assessment prior to the preparation of an ESMP.

The E&S Safeguard Officer will also complete the documentation, permits and clearances required under the government's Environmental Regulation before any project activities begin.

At this stage, staff who will be working on the various subproject activities should be trained in the environmental and social management plans relevant to the activities they work on. The E&S Safeguard Officer should provide such training to field staff.

The E&S Safeguard Officer should also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures for civil works. The E&S Safeguard Officer should provide training to selected contractors to ensure that they understand and incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by contractors to subcontractors and vendors. The E&S Safeguard Officer should further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

c. Implementation and Monitoring – E&S Implementation

During implementation, the Environmental and Social Management Unit (ESMU) conduct regular monitoring visits. If there are contractors implementing subproject activities, the contractors will be responsible for implementing the mitigation measures in the E&S risk management documents, with E&S Safeguard Officer's oversight.

The PMU working to implement the project will ensure that monitoring practices include the environmental and social risks identified in the ESMF and will monitor the implementation of E&S risk management mitigation plans as part of regular project monitoring.

At a minimum, the reporting will include (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP. Reports from the local levels will be submitted to the [responsible party in the implementing agency] at the national level, where they will be aggregated and submitted to the World Bank on a quarterly [or biannual] basis.

Throughout the Project implementation stage, the E&S Safeguard Officer will continue to provide training and awareness raising to relevant stakeholders, such as staff, selected contractors, and communities, to support the implementation of the environmental and social risk management mitigation measures.

The PMU will also track grievances/beneficiary feedback (in line with the SEP) during project implementation to use as a monitoring tool for implementation of project activities and environmental and social mitigation measures.

Last, if the PMU becomes aware of a serious incident in connection with the project, which may have significant adverse effects on the environment, the affected communities, the public, or workers, it should notify the World Bank within 48 hours of becoming aware of such incident. A fatality is automatically classified as a serious incident, as are incidents of forced or child labor, abuses of community members by project workers (including gender-based violence incidents), violent community protests, or kidnappings.

d. Review and Evaluation – E&S Completion

Upon completion of Project activities, the PMU will review and evaluate progress and completion of project activities and all required environmental and social mitigation measures. Especially for civil works, the PMU will monitor activities with regard to site restoration and landscaping in the affected areas to ensure that the activities are done to an appropriate and acceptable standard before closing the contracts, in accordance with measures identified in the ESMPs and other plans. The sites must be restored to at least the same condition and standard that existed prior to commencement of works. Any pending issues must be resolved before a subproject is considered fully completed. The PMU will prepare the completion report describing the final status of compliance with the E&S risk management measures and submit it to the World Bank.

5.2 Technical Assistance Activities

The PMU will ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with Terms of Reference acceptable to the Bank, that are consistent with the ESSs. They will also ensure that the outputs of such activities comply with the Terms of Reference.

5.3 Contingency Emergency Response Component

GRADES-B includes a CERC (Component 4). The CERC Manual to be prepared for GRADES-B will include a description of the environmental and social risk assessment and management arrangements if the CERC component becomes activated. This may include a CERC ESMF or an Addendum to this ESMF based on the subproject activities that will be funded under the CERC component. If such additional documentation or revision to documentation is needed, the PMU will prepare, consult, adopt, and disclose these in accordance with the CERC Manual, and implement the measures and actions as necessary.

5.4 Implementation Arrangements

The overall responsibility for implementing the Environmental and Social Management Framework (ESMF) lies with the **PMU**. The PMU is tasked with ensuring the operationalization and compliance with environmental and social safeguards throughout the project lifecycle. The roles and responsibilities of the PMU, Environmental and Social Safeguards (ESS) officers, contractors, and other stakeholders are outlined below.

PMU: Roles and Responsibilities

The implementation arrangements leverage the existing capacity of the **Project Management Unit (PMU)** within the Secondary Education Department (SED), which is already managing education projects supported by the World Bank and other donors. This PMU will serve as the key institutional mechanism to oversee the implementation of STEP-B and GRADES-B.

Key Responsibilities of the PMU-SED

1. Develop and secure **annual work plans** with approvals from the **Project Coordination Committee (PCC)** and concurrence from the **Project Steering Committee (PSC)**.
2. Ensure the project is implemented in alignment with its design, including compliance with the financing agreements, project appraisal documents (PAD), and operational manuals (POM).
3. Facilitate project activities, coordinate with relevant stakeholders, and raise awareness about the project objectives and benefits.
4. Ensure the effective implementation and monitoring of environmental and social safeguards measures outlined in the ESMF.
5. Identify challenges and bottlenecks during implementation and take corrective actions.
6. Regularly monitor project activities and prepare progress reports to ensure timely delivery of project outputs.
7. Manage all **procurement activities**, ensuring compliance with project procurement guidelines, and oversee the maintenance of project assets.
8. Handle financial management, including operating the **Designated Accounts (DA)** and ensuring the use of funds complies with GoB regulations and World Bank standards.
9. Ensure all administrative matters are handled efficiently to support smooth project implementation.
10. Represent the PMU-SED in the PCC and PSC meetings to communicate project progress and challenges.

ESS Management

The **E&S Safeguard Officer(s)** within the PMU-SED will have overall responsibility for ensuring environmental and social safeguards compliance. Their roles include the operationalization of the ESMF at the field level through proper implementation of Environmental and Social Management Plans (ESMPs). They will also be responsible for:

1. **Preparation and Review:**
    - Develop and review ESMPs to ensure adherence to project safeguards and guidelines.
    - Ensure all ESMPs include site-specific environmental and social mitigation measures.
2. **Capacity Building and Training:**
    - Develop training manuals and lead capacity-building workshops for project staff, contractors, and community organizations, such as **PTSMCs** (Parent-Teacher School Management Committees).
    - Provide training to construction contractors, community mobilization firms, and NGOs involved in project implementation.
3. **Monitoring and Coordination:**
    - Conduct periodic monitoring of sub-projects to ensure compliance with ESMPs and ESMF guidelines.
    - Coordinate with provincial and district-level stakeholders to address environmental and social safeguards concerns.
    - Ensure effective implementation of the **Grievance Redress Mechanism (GRM)**.
4. **Reporting:**
    - Develop quarterly ESS monitoring reports based on data from field visits and reports submitted by field staff/contractors and third-party monitoring firms.
    - Analyze findings and ensure that key issues are addressed in project implementation.

Environmental and Social Management Plans (ESMPs)

Based on the outcomes/findings of the E&S screening, site-specific ESMPs will be prepared by the **Environment and Social Safeguards Officer** at the PMU-SED for the sub-projects, where needed. The ESMPs will outline:

- Detailed mitigation measures to address potential environmental and social risks.
- Monitoring and reporting frameworks to track the effectiveness of mitigation actions.
- Roles and responsibilities for all stakeholders involved in implementation.

The **Engineers/staff** assigned to the project will assist in identifying sub-project sites, completing screening checklists, and preparing the environmental component of the ESMP. The **E&S Safeguard Officer** will handle the social components as well and consolidate them into the overall ESMP.

Table 7: Implementation Arrangements

Role	Responsibilities	Deliverable	Reporting Line	Monitoring Frequency	ESS Compliance & Monitoring Report
Third-Party Monitoring Firms	1. Conduct quarterly field monitoring. 2. Perform independent environmental audits. 3. Submit ESS compliance and monitoring reports to the E&S Safeguard Officers. 4. Conduct need-based monitoring as required.	ESS compliance/monitoring report	E&S Safeguard Officers	Quarterly & as needed	ESS Compliance & Monitoring Report
E&S Safeguard Officer	1. Conduct need-based and sample-based monitoring visits. 2. Review quarterly compliance and monitoring reports submitted by third-party monitoring firms. 3. Develop the project's own quarterly ESS report based on data from third-party reports and field visits.	Quarterly ESS report	PD – PMU	Quarterly & as needed	Project ESS Report
Project Director (PD)	1. Oversee overall ESMF management and compliance. 2. Monitor site activities on a sample basis.	Quarterly project ESS report	E&S Safeguard Officer	Quarterly & as needed	Quarterly ESS Report to World Bank & PSC

Contractors	1. Comply with environmental and social mitigation measures as directed by the E&S documentation, and the contractor's own contract agreement and Code of Conduct, and the Labor Management Procedures 2. Take all necessary measures to protect the health and safety of workers and community members, and avoid, minimize, or mitigate any environmental harm resulting from project activities	Monthly E&S reporting	E&S Safeguard Officer	Monthly	Monthly E&S report to PMU E&S Safeguard Officer

5.4 Proposed Training and Capacity Building

Both the STEP-B and GRADES-B projects focus on improving educational access and quality in Balochistan. As such, environmental and social risk management is crucial in achieving the projects' outcomes. The training and capacity building will need to address specific challenges and risks, such as gender equality, community engagement and safeguarding children especially in remote areas.

Capacity Building

To ensure effective implementation of the ESMF, the project has allocated resources for capacity building at various levels. This includes training staff from the PMU, community organizations, contractors, and other stakeholders throughout the project lifecycle.

Key Capacity-Building Activities:

1. **Development of Training Materials**:
    - Create training manuals in local languages for better comprehension.
2. **Workshops and Training Sessions**:
    - Train staff on citizen engagement, environmental and social safeguards, monitoring, and grievance redress.
    - Conduct specialized training on land acquisition, conflict management, participatory consultation techniques, and cultural resource management.
3. **Exposure Visits**:
    - Organize exposure visits to similar projects domestically or internationally to learn best practices in ESS management and implementation.
4. **Community Training**:
    - Equip Parent-Teacher School Management Committees (PTSMCs) and community representatives with skills for participatory monitoring.

Table 8: Proposed Training and Capacity Building Approach

Level	Responsible Party	Audience	Topics/Themes That May Be Covered	Frequency
Provincial Level	E&S Safeguard Officer, PMU	Provincial-level staff from SED and education project officers	- ESMF implementation. - Community engagement strategies. - Mitigation approaches for environmental and social risks.	Annual
District Level	ESS Safeguard Officer, PMU	District education officers, SED staff, and field facilitators	- ESMF implementation. - Risk mitigation measures tailored to district-level operations. - Stakeholder engagement at the community level.	Biannual
Construction-Specific District Level	E&S Safeguard Officer, Resource Persons	Construction contractors, subcontractors, and district construction teams	- ESMF/ESMP, LMP, WMP implementation during construction. - Community and occupational health and safety. - Gender sensitivity and conflict resolution. - Grievance redress mechanism	Biannual
School and Community Level	PMU and Resource Persons	Teachers, students, SED staff, communities, school stakeholders, and district facilitators	- Nutrition and environmental awareness. - Hygiene promotion and WASH practices. - Disaster risk reduction (DRR). - Plantation and green school initiatives. - Development of accessible communication materials for education facilities and communities. - Grievance redress mechanisms	Annual

5.5. Voluntary Land Donation and Land Acquisition Screening

Introduction
Voluntary land donation (VLD) is an approach where landowners willingly contribute a portion of their land for community development projects. This chapter outlines the principles, procedures, and safeguards to ensure that such donations are truly voluntary, equitable, and free from coercion or adverse social and environmental impacts.

The Voluntary Land Donation (VLD) and Land Acquisition process will follow the guidelines as per the Annexure 4 of this ESMF to ensure transparency, fairness, and adherence to safeguards. Efforts prioritize voluntary donation, with strict criteria including clear ownership, equitable distribution, and protection against economic loss or displacement. Vulnerable groups are exempt unless they directly benefit, with safeguards ensuring informed consent. Documentation, including written agreements, community consultation records, and public disclosure, ensures transparency and accountability.

5.6. Involuntary Land Resettlement (for GRADES-B)

A comprehensive Resettlement Policy Framework (RPF) will be developed to address potential issues related to land acquisition, voluntary land donation, restrictions on land use, and involuntary resettlement within the GRADES-B project. This framework will be formulated in alignment with the World Bank (WB) Environmental and Social Standard 5 (ESS5) on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement, as well as relevant national and provincial laws. The future RPF will establish key principles and guidelines for resettlement planning, ensuring that both government policies and WB's ESS5 requirements are met. It will also include strategies to manage voluntary land donations and the relocation of informal settlers/occupants on public lands.

Once specific subprojects and project components are identified, the RPF will be formally developed to assess potential risks and impacts. It will also propose appropriate mitigation measures to protect affected communities, especially vulnerable groups. The RPF will serve as a basis for subsequent Resettlement Action Plans (RAPs) or other required instruments, which will be finalized and approved by the World Bank before any activities involving displacement are initiated. This preliminary outline ensures that future resettlement planning remains systematic, transparent, and aligned with international best practices, while maintaining flexibility to adapt to project-specific conditions as they emerge.

6. Stakeholder Engagement, Disclosure, and Consultations

A separate Stakeholder Engagement Plan (SEP) has been prepared and disclosed for the Project, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. This ESMF, as well as the SEP and Environmental and Social Commitment Plan (ESCP) that have been prepared for these projects, have been disclosed in draft on the website:

Prior to appraisal, three stakeholder consultations were conducted in Quetta:

Location	Date	Total number of female participants	Total number of male participants
Quetta	December 17th 2024	06	14

Quetta	January 14th 2025	18	00
Quetta	January 15th 2025	01	36

The following stakeholder groups were consulted:

Stakeholder type	**Designation**
Government	DEO Quetta Conservator of Forests (North) Assistant Director (BEPA) Deputy Director (BEPA)
NGO/Private Sector	Researcher (IDSP) Manager NRM (BRSP) Project Coordinator (IDO) Project Officer (Taraquee Foundation) Project Manager (DANESH Organization)
Parents/Teachers/PTSMC members	JET Head master Head Mistress SST (Sc) Fellow JDM (mother) PTSMC president

Participants voiced concerns about school infrastructure, citing poor conditions, lack of maintenance, and inadequate facilities, especially in rural areas. They also highlighted issues with contractor coordination and suggested involving head teachers in construction projects. Some design features, such as artificial tiling and grass, were deemed impractical.

Teacher-related concerns included addressing corporal punishment, implementing a systematic recruitment policy with better incentives, and providing safe transportation for female teachers. The lack of standardization for school size and teacher-student ratios was also noted, leading to uneven workloads. Participants suggested cash-based awards for teacher performance and highlighted budget constraints as hindering recruitment.

Regarding school management, participants emphasized local ownership, suggesting alumni engagement and careful selection of Parent-Teacher School Management Committees (PTSMCs). Revitalizing dormant PTSMCs and ensuring long-term sustainability of community engagement were also stressed.

Student-related concerns included the need for resource centers for girls, addressing the potential negative impacts of the "pass-fail" system, and including street children and out-of-school children in interventions.

Environmental and social considerations highlighted the importance of water management, tree preservation, and incorporating groundwater recharge and rainwater harvesting techniques. The need for behavioral change interventions for WASH and disaster risk management in schools was also emphasized.

Participants also raised gender concerns, including the need for gender specialists, mental health support, and menstrual hygiene management in schools. Addressing gender-based violence through various interventions and expanding training on related issues were also recommended.

Finally, potential land ownership issues were identified as a potential challenge during project implementation.

ANNEXES

Annexure 1: E&S Screening criteria

Category	Description	Requirement
A	Proposed project is classified as significant adverse social and/or environmental impacts that are sensitive, diverse, or unprecedented. These impacts may affect an area broader than the sites or facilities subject to physical works.	Full ESMP: Examines the project's potential negative and positive environmental and social impacts, compares them with those of feasible alternatives (including the "without project" situation), and recommends measures to prevent, minimize, mitigate, or compensate for adverse impacts.
B	Proposed project is classified as Category B if its potential adverse social impacts on human populations or environmentally important areas—such as wetlands, grasslands, forests, or natural habitats—are less adverse than those of Category A projects. These impacts are site-specific, reversible, and easier to mitigate.	Narrower scope of ESMP than for Category A. Examines potential impacts and recommends measures to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental and social performance.
C	Proposed project is classified as Category C if it is likely to have minimal or no adverse social and/or environmental impacts.	Beyond screening, no further action is required.

Annexure 2: National and Provincial Legislative Frameworks

This annexure provides an overview of the values of national and provincial legislative and regulatory frameworks relevant to environmental and social considerations for project implementation.

Table 1: Projects Requiring an IEE (Initial Environmental Examination)

Category	Project Types	Thresholds
A. Agriculture, Livestock, and Fisheries	Poultry, livestock, stud, and fish farms	Cost > Rs. 10 million
	Projects involving repacking, formulation, or warehousing of agricultural products	-
B. Energy	Hydroelectric power generation	Capacity < 50 MW
	Thermal power generation	Capacity < 200 KW
	Transmission lines	Voltage < 11 KV
	Oil and gas transmission systems	-
	Oil and gas extraction, exploration, production, and storage projects	-
	Waste-to-energy generation projects	-
C. Manufacturing and Processing	Ceramics and glass units	Cost > Rs. 50 million
	Food processing industries (sugar mills, beverages, milk, and dairy products)	Cost < Rs. 100 million
	Manufacturing of apparel (including dyeing and printing)	Cost > Rs. 25 million
	Wood products	Cost > Rs. 25 million
D. Mining and Mineral Processing	Extraction of sand, gravel, limestone, clay, sulfur, and other minerals	Cost < Rs. 100 million
	Crushing, grinding, and separation processes	-
E. Transport	Federal/provincial highways (excluding maintenance)	Cost < Rs. 50 million
	Ports and harbor development for ships < 500 gross tons	-
F. Water Management, Dams, and Irrigation	Dams and reservoirs with storage volume < 50 million cubic meters or surface area < 8 square kilometers	-
	Irrigation and drainage projects serving < 15,000 hectares	-
G. Water Supply and Treatment	Water supply schemes and treatment plants	Cost < Rs. 25 million
H. Waste Disposal	Waste disposal facilities for domestic/industrial waste	Capacity < 10,000 cubic meters annually
I. Urban Development and Tourism	Housing schemes	-
	Public facilities with significant off-site impacts (e.g., hospitals)	-
J. Other Projects	Any project requiring an IEE as per Federal Agency	-

Table 2: Projects Requiring an EIA (Environmental Impact Assessment)

Category	Project Types	Thresholds
A. Energy	Hydroelectric power generation	Capacity > 50 MW
	Thermal power generation	Capacity > 200 MW
	Transmission lines and grid stations	Voltage ≥ 11 KV
	Nuclear power plants	-
	Petroleum refineries	-
B. Manufacturing and Processing	Cement plants	-
	Fertilizer plants	-
	Food processing industries (e.g., sugar mills, beverages, dairy products)	Cost ≥ Rs. 100 million
	Industrial estates (including export processing zones)	-
C. Mining and Mineral Processing	Mining and processing of coal, gold, copper, sulfur, and precious stones	-
	Smelting plants	Cost ≥ Rs. 50 million
D. Transport	Airports	-
	Federal/provincial highways or major roads	Cost ≥ Rs. 50 million
	Ports and harbor development for ships ≥ 500 gross tons	-
E. Water Management, Dams, and Irrigation	Dams and reservoirs with storage volume ≥ 50 million cubic meters or surface area ≥ 8 square kilometers	-
F. Waste Disposal	Hazardous waste disposal and storage facilities	-
G. Urban Development and Tourism	Land-use studies and urban plans for large cities	-
H. Environmentally Sensitive Areas	All projects situated in environmentally sensitive areas	-
I. Other Projects	Any project likely to cause adverse environmental effects	-

Table 3: EQS for Effluent Discharge

Parameter	Standard
Temperature	≤ 40°C (ΔT ≤ 3°C)
pH	6 – 9
BOD5	80 mg/L
Chemical Oxygen Demand (COD)	150 mg/L
Total Suspended Solids (TSS)	200 mg/L
Total Dissolved Solids (TDS)	3500 mg/L

Grease and Oil	10 mg/L
Phenolic Compounds (as Phenol)	0.1 mg/L
Ammonia	40 mg/L
Chlorine	1.0 mg/L
Chloride	1000 mg/L
Sulfate	600 mg/L
Manganese	1.5 mg/L
Fluoride	10 mg/L
Cyanide (as CN)	1.0 mg/L
Anionic Detergents (as MBAs)	20 mg/L
Sulfide	1.0 mg/L
Pesticides	0.15 mg/L
Cadmium	0.1 mg/L
Chromium (trivalent and hexavalent)	1.0 mg/L
Copper	1.0 mg/L
Lead	0.5 mg/L
Mercury	0.01 mg/L
Selenium	0.5 mg/L
Nickel	1.0 mg/L
Silver	1.0 mg/L
Total Toxic Metals	2.0 mg/L
Zinc	5.0 mg/L
Arsenic	1.0 mg/L
Barium	1.5 mg/L
Iron	8.0 mg/L
Boron	6.0 mg/L

Table 4: EQS for Gaseous Emissions

Parameter	Source of Emission	Standard
Smoke	All sources	Opacity ≤ 40% or 2 Ringlemann Scale
Particulate Matter (I)	Boilers and Furnaces (Oil-fired/Coal-fired)	300–500 mg/Nm³
Particulate Matter (II)	Cement Kilns	200 mg/Nm³
Hydrogen Chloride	Any source	400 mg/Nm³
Chlorine	Any source	150 mg/Nm³
Sulfur Oxides (SO2)	Sulfuric acid plants	400 mg/Nm³
Carbon Monoxide (CO)	Any source	800 mg/Nm³
Lead	Any source	50 mg/Nm³
Mercury	Any source	10 mg/Nm³

Table 5: EQS for Drinking Water

Parameter	Standard (Pakistan)	WHO Standards
E. Coli or Thermotolerant Coliform	Must not be detectable	Must not be detectable
pH	6.5–8.5	6.5–8.5

Total Dissolved Solids (TDS)	≤ 1000 mg/L	≤ 1000 mg/L
Chloride	≤ 250 mg/L	≤ 250 mg/L
Nitrate	≤ 50 mg/L	≤ 50 mg/L
Arsenic	≤ 0.05 mg/L	≤ 0.01 mg/L
Fluoride	≤ 1.5 mg/L	≤ 1.5 mg/L
Lead	≤ 0.05 mg/L	≤ 0.01 mg/L

Table 6: EQS for Ambient Air

Pollutant	Time-Weighted Average	Standard	Method of Measurement
Sulfur Dioxide (SO2)	Annual Average	≤ 80 µg/m³	Ultraviolet Fluorescence
	24 Hours	≤ 120 µg/m³	
Nitrogen Oxides (NOx)	Annual Average	≤ 40 µg/m³	Gas Phase Chemiluminescence
Ozone (O3)	1 Hour	≤ 180 µg/m³	Non-Dispersive Absorption
Particulate Matter (PM)	Annual Average	≤ 360 µg/m³	High Volume Sampling

Annexure 3: Checklists for ESS procedures

Environment and Social Screening checklist

Name of school: _____BEMIS Code: _____

Level: Primary_____ Middle: _____ High: _____ District: _____

S. #	Issues	Yes	No	Proposed mitigation measures[2]
	Zoning and Land Use Planning			
1	Does the additional land required for the sub-project will be acquired through Voluntary Land Donation or Land Acquisition?			
2	Will the subproject involve significant land disturbance?			
3	Will the subproject lead to the loss/destruction of vegetation?			
4	Will the subproject land be subject to potential encroachment by urban use?			
	Water and Soil Contamination			
1	Will the subproject require large amounts of raw materials?			
2	Will the subproject generate large amount of construction material?			
3	Will the subproject generate large amount of residual wastes?			
4	Will the subproject cause soil erosion?			
5	Will the subproject result in potential soil or water contamination(e.g from oil, grease or fuel from equipment yard)?			
6	Will the subproject lead to contamination of ground water?			
7	Will the subproject lead to contamination of surface water?			
8	Will the subproject involve the use of chemicals or solvents?			
9	Will the subproject cause contamination of soil due to waste dumps, and equipment yards?			
10	Will the subproject lead to the creation of stagnant water bodies in borrow pits, quarries, etc., encouraging for mosquito breeding and other disease vectors?			
	Noise and Air Pollution Hazardous materials			

[2] If the response is "YES", propose site specific mitigation measure(s)

1	Will the subproject increase the levels of harmful air emissions?			
2	Will the subproject increase ambient noise levels?			
3	Will the subproject involve the storage, handling or transport of hazardous substances?			
	Fauna and Flora			
1	Will the subproject involve the disturbance or modification of existing drainage channels (rivers, canals) or surface water bodies (wetlands, marshes)?			
2	Will the subproject lead to the disruption/destruction of wildlife habitat due to noise-related problems?			
	Destruction/Disruption of Land and Vegetation			
1	Will the subproject lead to unplanned use of the infrastructure being developed?			
2	Will the subproject lead to erosion of land?			
	Cultural Property			
1	Will the proposed project constrain access to cultural sites for the communities?			
2	Will the subproject have an impact on archaeological or historical sites, including historic urban areas?			
3	Will the subproject have an impact on religious monuments, structures and/or cemeteries?			
	Social Disturbance			
1	Will the subproject involve demolition of existing structures?			
2	Will the subproject lead to induced settlements by workers and others causing soil disruption?			
3	Will the subproject lead to environmental and social disturbance by construction camps?			
4	Is the proposed project likely to negatively affect the income levels or employment opportunities of vulnerable groups?			
5	Will the construction activities reduce/stop access to school facilities for students and staff?			
	Social Equity and Equality			

1	Would the subproject have environmental and social impacts that could affect vulnerable groups such as elderly, children, women ,mentally or physically impaired?			
2	Is the subproject likely to negatively impact women?			
3	Is the subproject likely to directly or indirectly increase social inequalities now or in the future?			
4	Will the subproject have variable impacts on women and men, different ethnic groups, social classes?			
5	Have there been challenges in engaging women and other certain key stakeholder groups in preliminary discussions for this project?			
6	Is the subproject likely to attract forced labor and/or child labor?			
	Demographics			
1	Would subproject likely to cause overload of social infrastructure in the project area (e.g. health facilities, schools, water supply)?			
2	Would the subproject result in involuntary resettlement of population?			
	Construction Site issues			
1	Does the subproject require land acquisition? * [Note: Fill in the land acquisition form if YES] Refer to Resettlement Action Plan Framework			
2	Will the land be donated voluntarily?			
3	Has the owner been made aware of Voluntary Land Donation (VLD) nature and procedure?			
4	Has the landowner agreed to sign the VLD documents?			
5	Has the VLD documents and agreement been duly signed by all the members?			
6	Is the subproject located on land with contested ownership?			
7	Is the subproject located in an area with security problems?			
8	Is the subproject located in an area with designated natural reserves?			

9	Is the subproject located close to the following: groundwater sources:_____surface water bodies:_____: water courses:_____ wetlands:_____			
10	Is the project located in an area where IDPs/refugees are temporarily settled?			
11	Is the subproject located near a waste dump?			
12	Does the subproject have access to potable water?			
13	Is the subproject located in an area with the wastewater network			
14	Is the subproject located far (1-2 KM) from the accessible road/			

Site visited by: _____ **Designation: _____**

Signature: _____ **Date of Visit: _____**

Environmental and Social Safeguard Management and Monitoring Checklist

Name of school: _____ BEMIS Code: _____

School ID:_____ Level: Primary :_____ Middle:_____ High:____

District: _____ Tehsil: _____ UC: _____

Siting stage checklist

S. No	Land mutation status	Observed Response		
		Yes	No	N/A
1	Does the construction site require additional land? If yes			
2	Has the land mutation process been completed?			
	Description of school siting			
1	Is the site in the flood path?			
2	Is the site adjacent to the landslide area?			
3	Is the site adjacent to the hill?			
4	Is the construction site located on saline land?			
5	Is the site close to the waste dumpster?			
	Description of the possible impact on natural vegetation			
1	Is the construction site close to the cluster of trees? If yes			
2	How many trees are there? Give No.____			
	Health and safety			
1	Is the school site 500 feet away from the highway?			
2	Are the transmission lines passing over the selected site? If yes go to next question			
3	What is the type of transmission line that is passing over the selected site? High Tension (HT)_____ Low tension (LT) _____Service line _____			
4	Is there an electricity pole inside the school premises? If yes			
5	What is the type of pole? High Tension (HT)_____ Low tension (LT) _____ Concrete pole:_____			
6	Does the school have a functional handwashing area?			
7	Does the existing handwashing area need repairs? Minor ____ Major _____ N/A___			
8	Does the school have any of the following fire safety equipment in the school ground or veranda? Fire extinguisher:_____ Fire blanket:_____ Sand Buckets:_____			
	Environmental enhancement			
1	Are there waste bins in all the classes?			
2	Does the school have a waste bin in the playground for the collection of waste?			
3	Does the existing school building have trees? (If Yes go to the next question)			
4	Write the number of trees available in school ____			
5	Does the selected site have space for more plantations? (If Yes go to next question)			

6	Is enough water available for the plantation?			
	Facilitation of differently-abled			
1	Does the existing raised school building have the following facilities: Ramp: ___ Handrail: ____ The school building is on ground level: ___			
2	Does the existing raised school toilet has the following facilities: Ramp: ____ Handrail: ____ The existing school toilet is on ground level: ___			
3	Is there any differently-abled child in school? If yes provide the following information on the prescribed format and attach it with this form.			

Site visited by: _____ **Designation: _____**

Signature: _____ **Date of Visit: _____**

Environmental and Social Safeguard Management and Monitoring Checklist

Name of school: _____ BEMIS Code: _____
School ID: _____ Level of school: Primary_____ Middle_____ High: _____
District: _____ Tehsil: _____ UC: _____
Land mutation status: Not yet started_____ In process _____Finalized_____ Not Required_____

(Construction Stage)

S. No	Description of different Environment and Social impacts	Observed response		
1	**Possible Impact on soil and land**	**Yes**	**No**	**N/A**
1.1	Has the construction pond for soaking the bricks been constructed?			
1.2	Has there been any discovery of artifacts?			
1.3	Has proper sewerage and waste disposal system been made with newly constructed toilets?			
1.4	Do the existing toilets have proper waste disposal system?			
2	**possible impact on water**			
2.1	Is the leftover construction waste being disposed of in a nearby water body?			
3	**Description of possible impact on natural vegetation**			
3.1	Will excavation work cause the cutting of trees? (If Yes, reply to remaining questions)			
3.2	How many trees will have to be removed? Write numbers :_____			
3.3	Has compensatory plantation been carried out? If no go to the next question			
3.4	What was the reason for not carrying out compensatory plantation? Budget not available:____ Plantation time was over:_____ Land was not available for plantation:_____ Water not available for plantation:_____			
3.5	Has wastewater of the handwashing area been diverted towards the plantation area? School has no plantation area:_____			
4	**Health and safety**			
4.1	Have separate toilets been constructed for boys and girls in gender-free primary schools only? If not go to next question.			
4.2	Space not available:_____ the school already has a separate toilet for boys and girls:____ The school is not gender-free:_____			
4.3	Is construction stockpiled material causing obstruction of movement to people or vehicles in the area?			
4.4	Has construction work disrupted school activities?			
4.5	Is there any risk of Gender-based violence (GBV) or harassment during construction? If yes			
4.6	Has the Code of Conduct been signed by the labor and contractor?			
4.7	Has the construction area been fenced to restrict access?			
4.8	Has *Parda* arrangement been installed around the construction area for the easy and comfortable movement of girl students and female teachers?			
4.9	Has an emergency exist been made in the newly constructed classrooms? If yes			
4.10	In how many newly constructed rooms emergency exit has been made? Write No:_____			
4.11	Has workplace safety training been imparted to the labor working at the construction site?			
4.12	Tick the Personal Protective Equipment that has been provided to labor at the construction site? boots:_____ Gloves:_____ Helmet:_____ None:_____			
4.13	Has a new handwashing area been constructed in school? Hand wash area already exists____			
5	**Facilitation of differently - abled**			
5.1	Has the following facility been provided with raised school building? Ramp:___ Handrail:___NA___			

5.2	Has the following facility been provided with the newly constructed raised toilet? Ramp:__ Handrail:___NA__			
5.3	Has the following facility been provided with the existing raised toilet? Ramp:___ Handrail:___NA___			
5.4	Has the community of the area been oriented on ESMP guidelines?			

Site visited by: _____ **Designation: _____**

Signature: _____ **Date of Visit: _____**

Environmental and Social Safeguard Management and Monitoring Checklist

Name of school: _____ BEMIS Code: _____
School ID:_____ Level of school: Primary _____ Middle_____ High:_____
District: _____ Tehsil: _____ UC: _____

(Operational Stage)

	Description of the possible impact on soil and land	**Observed Response**		
		Yes	**No**	**N/A**
1	Has the construction pond been leveled back to the existing ground level?			
2	Has leftover construction material and excavated soil been disposed of in the designated area			
3	Are the newly constructed toilets of the project in proper working condition? If yes go to question No.4. If no go to question no 5.			
4	How sewage is being disposed off.? Public sewerage: ___Septic tank: ____Soakage pit:_____ Dry pit:____			
5	Reason of non-functional toilet (1. Water for toilet is not available ____2. Sanitary equipment are not complete _____ 3. Sanitary equipment is non-functional 4. Toilet(s) are chocked_____5. Septic tank /soak pit is full or choked____6. Toilet slab is broken____7. Pit is full___ 8. Water Storage tank is not available:_____			
6	Who is responsible for cleaning the toilet: Sweeper:_____ Students:_____ Other:____			
7	Is there any budget allocated for regular maintenance of Water Sanitation and Hygiene (WASH) facilities?			
8	Is PTSMC taking care of (WASH) facilities?			
	Description of Possible Impact on Health and Safety of Construction Activity:	**Observed Response**		
		Yes	**No**	**N/A**
1	Is soap available in school for washing hands?			
2	Is the newly constructed hand washing area functional? If no go to Q. No 3			
3	The existing handwashing area was repaired			
4	What is the reason that the handwashing area is not functional? 1.Water not available:____ 2.Tap(s) broken:____3.Storage tank not available_____4.Water drainage outlet is choked:____			
5	How is the access to handwashing area: Kacha:_____ Pakka:_____			
6	Does school have availability of drinking water? If yes			

7	What is the source of drinking water in school? Hand pump:___ Tap connected to the water storage tank:____ Mataka:____ Plastic Cooler:_____ Electric cooler:_____ Children bring their own water bottle:_____ Any other:_____			
8	Have any complaints been received regarding the quality of drinking water?			
9	Has any monitoring of drinking water been conducted? If yes when was the water test was conducted: ____			
10	How many waste bins have been provided in each classroom? Write NO:_____ School already had waste bins:_____			
11	How many waste bins have been provided in school playground? Write NO:_____ School already had waste bins:_____			
12	Does the school have any of the following fire safety equipment in the school ground or veranda? Fire extinguisher:_____ Fire blanket:_____ Sand Buckets:_____			
	Environmental enhancement through school development:	**Yes**	**No**	**N/A**
1	Have trees been planted? (If "No "go to question 2, if "Yes" go to Question 3)			
2	Tick the reason for not planting trees 1. Land not available ____ 2. Water not available _____3. Plantation time was over _____ 4. Plantation was carried out but it got dried: _____ 5. Plants were not available:_____ 6. School has no boundary wall____			
3	How many trees have been planted? Give Number:_____			
4	Have the health and hygiene messages been painted? If no go to the next question			
5	Budget issue:____ No trained personnel was available:____			
	Compliance of proposed mitigation measures (If any)	**Yes**	**No**	**N/A**
1	Has any mitigation measure been taken to ensure safety of school children. If yes, mention below which mitigation measure has been taken. If yes select the accurate option below			
2	Pole replacement__ Pole concreting____ shifting transformer on raised platform____ flood protection wall constructed___ Retaining wall constructed:_____ Installation of traffic sign____ land filling of school__ Use of Sulphate Resistant Cement___ Compensatory tree plantation : ___Filling of construction pond:__another_____			
	Grievance Redress Mechanism	**Yes**	**No**	**N/A**
1	Is the community aware of the Grievance Redress Mechanism (GRM) System?			
2	Do communities know where to lodge complaints?			
3	Does the school invite complaints and feedback? If yes go to the question No 4. If No, go to question No. 5			
4	How are the complaints documented/recorded? Complaint register:____: Receipt: ___On piece of paper:___ Verbal:____ The school doesn't invite complaints: _____ School doesn't have GRM system: _____Other:_____			
5	How does the school respond to the complaints? By community:_____ students:_____ parents:_____			

6	How long does it take to respond back to the registered complaint? Write no of days:___			
7	What ways are used by the school to resolve grievances? Through internal school committee:____ Through PTSMCs: _____Only principal resolves it through discussion:_____ Other:_____			
8	Can the grievance mechanism be accessed free of charge?			
9	Does the school provide training on grievance management to staff?			

Site visited by: _____ **Designation: _____**

Signature: _____ **Date of Visit: _____**

Annex 4: LAND ACQUISITION AND VOLUNATRY LAND DONATION

1. Project Background

The project will support the establishment of 30 PPP schools and 60 community schools for the primary level by engaging the local communities in school management through the mechanism of PTSMCs. Community schools will be established in partnership with BEF and non-governmental organizations and in rural and underserved areas where at least 20 students can be mobilized. The community will be expected to donate the land for these community schools, which will be facilitated through the mechanism of Voluntary Land Donation (VLD). Additionally, project activities of both GRADES-B and STEP-B may require small-scale land acquisition for classroom expansions or new facilities. The ESMF entails the procedure for land acquisition and Voluntary Land Donation (VLD) that is designed in accordance with the World Bank Policy under its Environmental and Social Framework (ESF) and applicable laws and regulations of Pakistan and the Balochistan Province. The legal, institutional and implementation framework for the compensation of lost assets, livelihoods, community property, resettlement and rehabilitation of project affected people will be outlined in the RPF.

Voluntary land donation (VLD) is an approach where landowners willingly contribute a portion of their land for community development projects. This chapter outlines the principles, procedures, and safeguards to ensure that such donations are truly voluntary, equitable, and free from coercion or adverse social and environmental impacts.

For the community schools the first preference of the project will be to avoid land acquisition either through establishment of schools on government land or pre-existing public structures, however in cases where public land will not be available community will be expected to donate land through the mechanism of VLD. Community schools will be established nearby/within communities to ensure safe and easy access for the students. As per the local context of Balochistan, in cases where the communities reside on communal/private land, government land will be available outside the communities which will hinder the access of the school by the students. The previous experiences of School Education Department Balochistan for establishment of community schools have received acceptance from the community and have expressed willingness to voluntarily donate land for establishment of community schools as community is the direct beneficiary of the intervention. The acquisition procedure will follow the guidelines for Voluntary Land Donation as per the ESS 5 of World Bank's ESF.

This framework outlines the principles and procedures for Voluntary Land Donation (VLD), ensuring compliance with the World Bank's Environmental and Social Standard 5 (ESS5) on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement. The framework aims to ensure that land donation is truly voluntary, does not result in adverse impacts on livelihoods, and follows transparent and equitable processes.

The project will broadly consider the following two options for acquisition of additional land required for any sub-project:

1. Voluntary Land Donation for the required additional land by the individual or collective owners of the land.
2. Land Acquisition of the additional land by the private owner by paying compensation of land and mitigating any adverse impacts as a result of acquisition.

2. Principles and Objectives:

ESS-5 recognizes that project-related land acquisition or restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement, leading to loss of income sources or other means of livelihood), or both. In line with ESS5 2, the principles and objectives of this ESMF are to:

- Avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.
- Mitigate unavoidable adverse social and economic impacts from restrictions on land use by a) providing timely compensation for loss of assets at replacement cost, and b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- Establish entitlements of all categories of affected persons (APs), for both physical displacement and livelihood impacts, and, to ensure that these are provided in a transparent, consistent, and equitable manner.
- Focus on gender aspects and the needs of vulnerable segments of communities.
- Ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.
- Institute and ensure access to grievance redress mechanism throughout the planning and implementation of the resettlement process.

The World Bank's Environmental and Social Standard 5 (ESS5) on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement establishes clear principles to ensure that Voluntary Land Donation (VLD) is conducted ethically, transparently, and without causing harm to affected individuals or communities. The following principles provide a comprehensive guide to implementing VLD under ESS5 while protecting landowners' rights and livelihoods.

a. The potential donor or donors have been appropriately informed and consulted about the project and the choices available to them.
b. Potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation.

c. The amount of land being donated is minor (not greater than 10 percent in this case) and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels.
d. No household relocation is involved.
e. The donor is expected to benefit directly from the project;
f. For community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached.

3. Legal Framework for Land Acquisition and Resettlement

Constitution of Pakistan

Article 24 of the Constitution of Pakistan addresses the protection of property rights by stating that "no person shall be compulsorily deprived of his property save in accordance with law" and "no property shall be compulsorily acquired or taken possession of save for a public purpose, and save by the authority of law which provides for compensation". However, it neither prescribes the amount of compensation required, nor specifies the principles and manner in which compensation is to be determined and given. Further, Article 4, sub-clause (2) (a) reiterates the legislative right of people; "no action detrimental to the life, liberty, body, reputation or property of any person shall be taken except in accordance with law".

Land Acquisition Act 1894

Pakistan's land acquisition process is governed by the Land Acquisition Act (LAA) of 1894, which empowers federal and provincial governments to acquire private land for public purposes and companies through eminent domain. Land acquisition is a provincial responsibility, and each province has its own interpretation of the LAA, reflected in its implementation regulations and rules. In the absence of a national resettlement policy, the LAA serves as the primary legal instrument governing resettlement and compensation.

The LAA outlines a systematic process for land acquisition and compensation, encompassing notifications, surveys, acquisition, compensation awards, dispute resolution, penalties, and exemptions. It mandates the disclosure of land acquisition surveys to displaced persons. Crucially, the LAA primarily recognizes legal owners and registered tenants with formal lease agreements as eligible for compensation or livelihood support.

A significant limitation of the LAA is its lack of provisions for non-titleholders, such as tenants, informal settlers, and occupants, effectively excluding vulnerable groups from compensation. Furthermore, the LAA does not address rehabilitation for income or livelihood losses, nor does it provide for resettlement costs. A summary of the key sections of the LAA is provided in the table below.

Table 1 Salient features of the LAA 1894

Section	Feature
4	Publication of preliminary notification and power for conducting survey.
5	Formal notification of land needed for a public purpose. Section 5a covering the need for enquiry.
6	The Government makes a formal declaration of intent to acquire land.
7	The Land Commissioner shall direct the Land Acquisition Collector (LAC) to take order the acquisition of the land.
8	The LAC has to direct that the land required to be physically marked out, measured and planned.
9	The LAC gives notice to all displaced persons that the Government intends to take possession of the land and if they have any claims for compensation then these claims are to be made to him at an appointed time.
10	Delegates power to the LAC to record statements of affected people in the area of land to be acquired or any part thereof as co-proprietor, sub-proprietor, mortgagee, and tenant or otherwise.
11	Enables the Collector to make enquiries into the measurements, value and claim and then to issue the final “award." The award includes the land's marked area and the valuation of compensation.
16	When the LAC has made an award under Section 11, he will then take possession and the land shall thereupon vest absolutely in the Government, free from all encumbrances.
17	In cases of urgency, whenever the Government can take possession of any land needed for public purposes or for a Company. Such land shall thereupon vest absolutely in the Government, free from all encumbrances:
18	In case of dissatisfaction with the award, affected people may request the LAC to refer the case onward to the court for a decision. This does not affect the Government taking possession of the land.
23	The award of compensation for the owners for acquired land is determined at its market value plus 15% in view of the compulsory nature of the acquisition for public purposes.
28	Relates to the determination of compensation values and interest premium for land acquisition.

31	The LAC can, instead of awarding cash compensation in respect of any land, make any arrangement with a person having an interest in such land, including the grant of other lands in exchange.

The LAA includes provisions for expedited land acquisition in urgent situations. When a project deemed to be of public purpose requires swift implementation, the requesting department can approach the revenue department for land acquisition. The revenue department then assesses the nature of the emergency and applies the LAA accordingly.

Under the LAA and its implementation rules, compensation for land and crops is provided in cash to titled landowners at the prevailing market rate, following an impact identification and valuation exercise. While the LAA stipulates that land valuation should be based on the average registered land sale rates over the preceding 3 to 5 years, recent practices have seen the application of the median rate over the past year, or even current rates, with an additional 15% compulsory acquisition surcharge as mandated by law.

Balochistan Acquisition of Land Act 1974, 1976 and 1985 Amendments/Ordinances

In Pakistan, the primary legal framework for acquiring land for public purposes is the Land Acquisition Act of 1894 (LAA). Under the LAA, acquired land becomes the property of the province, which may then transfer it to another party. The Balochistan Acquisition of Land Act empowers the government to acquire private land for housing or development schemes. While the law initially specified "in rural areas," this limitation was removed by an ordinance in 1976.

Land acquisition in this context refers to the process by which the government or a government agency acquires privately held land for public purposes, as authorized by law. This process involves providing landowners with government-determined compensation for losses incurred due to relinquishing their land. The legal framework governing land acquisition in Pakistan has evolved from the LAA of 1894, which aimed to facilitate government acquisition of private land for public use.

The LAA defines "public purpose" to include the construction of educational institutions, housing schemes, health facilities, slum clearance projects, rural planning initiatives, and site development. The act allows not only government entities but also local authorities, registered societies, and cooperative societies to acquire land for developmental activities through the government.

ESS5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement

World Bank's ESS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. The term "involuntary resettlement" refers to these impacts. Resettlement is considered involuntary when affected persons (APs) or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement. For these reasons, involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented. The objectives of ESS5 are:

- To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives;
- To avoid forced eviction;
- To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher;
- To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure;
- To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant;
- To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

4. Process for Voluntary Land Donation and Land Acquisition

ESS-5 elucidates that the components designed under GRADES-B and STEP-B that may be subject to land acquisition or restriction on land use may cause physical displacement or economic displacement of people. This framework provides the requirement for screening, assessing, and processing of resettlement issues in the early stage i.e., in the planning phase of components and how to mitigate the adverse impacts of resettlement, relocation or the loss of livelihood. The displaced / affected persons and families should be identified at the sitting stage and adequately integrated as part of the subproject.

Resettlement shall be based on the following principles:

- identify possibility of land acquisition and resettlement or relocation during screening of sub-components using the screening checklists attached in annex
- avoid or minimize physical displacement through change in location or design of the subproject sites, where possible.
- if resettlement is unavoidable, prepare a Resettlement Plan (RP) or Abbreviated Resettlement Action Plan (ARAP) in line with ESS-5, LAA 1894, and provincial laws.
- ensure APs are clearly identified including those with no formal rights.
- undertake meaningful consultation with affected persons (APs).
- restore their livelihood- if, as per ESS-5, the subproject activities involve only economic displacement or significant impact on the livelihood of affected persons, a Livelihood Restoration Plan (LRP) will be developed.
- pay compensation in time before land is acquired, with authenticated process of disbursement and;
- disclose all relevant information to the APs.

Land Acquisition and Voluntary Land Donation Screening

During the screening stage, the E&S screening checklist will determine the requirement of additional land for the project sub-components. For acquisition of additional land by the private individual/communal owner, a land acquisition and involuntary resettlement screening checklist, attached later, will be filled for each proposed subproject to assess the impacts of land acquisition on the land-owners and project affected persons (PAPs). This screening will assess if resettlement impacts or any restrictions on land use necessitate the preparation of a Resettlement Plan, Abbreviated Resettlement Plan or a Livelihood Resettlement Plan. The instruments will be identified upon the proposed criteria through determinants identified in Resettlement Screening checklist. In situations where additional land is required, every effort will be made to ensure that the land is voluntarily donated by individuals or the community, following the guidelines provided in this ESMF. However, if acquiring private land becomes necessary, it will be done in accordance with the provisions underlined in ESMF and RPF. Additionally, the following considerations will be adhered to:

- Any land acquired must be located at a reasonable distance from protected areas, identified sensitive habitats, and wildlife habitats.
- The site should be at a safe distance from designated forested areas.
- The project should not result in the displacement or resettlement (either economic or physical) of local communities.
- The project should not negatively impact vulnerable groups, including women, children, and persons with disabilities.
- The site should not be within or near locations of archaeological or cultural significance.

If mechanism of Voluntary Land Donation is triggered for the acquisition of additional land required for the sub-project, a Voluntary Land Donation checklist, attached later, will be filled at each sub-project site to determine eligibility and livelihood impacts of the donation as per the ESS5. The checklist will verify if the following conditions are met for land to qualify for voluntary donation:

1. Clear Ownership: The land must be free from any disputes regarding ownership, tenure, or legal encumbrances.
2. Appropriate Use: The project team must ensure that the land is suitable for the proposed sub-project and that its use will not lead to any adverse social or environmental impacts.
3. Equitable Distribution: Efforts should be made to distribute land donation among multiple owners rather than relying on a single influential landowner.
4. Equal Access: Landowners must understand that donated land will be used for community infrastructure, and they will not have any claim on the donated land once the facility is established. No donor will receive preferential treatment over others.
5. Limit on Donation: No single donor should contribute more than 10% of their total landholding to avoid significant economic loss.
6. Communal Land: In cases where land is communally owned, consent from the landowners must be obtained through a consultative process.
7. Physical and Economic Displacement: Donations must not lead to physical or economic displacement (including loss of access to communal resources like grazing land, forests, or water sources).
8. Religious and Cultural structures: The land to be donated should not be reserved for any religious and cultural activities.

The time and date for the Environment and Social Screening exercise should be conveyed to the community. The community should be given prior notice at least a week ahead so that there is broad-based community participation during the actual E&S screening exercise.

The process of Voluntary Land Donation (VLD) for schools is facilitated through the office of the Deputy Commissioner (DC) to ensure that all legal formalities are properly completed. This process verifies ownership, prevents future disputes, and officially records the land for

educational use. By following a structured and transparent procedure, the donation of land for schools remains legally sound and well-documented.

For land donated by a single owner, a Fard document is prepared. This serves as an official land record confirming the donor's ownership and enabling a smooth transfer. The Fard is crucial as it verifies that the land is solely owned by the donor and can be legally transferred for school development. In cases where the land has multiple owners, an Inteqal (Mutation or Transfer of Ownership document) is required. This document records the change in ownership and ensures that all legal rights are properly transferred. By completing the Inteqal process, any potential ownership disputes among previous landowners are avoided, making the donation legally secure.

The same procedure will be followed for the Voluntary Land Donation (VLD) process under the STEP-B and GRADES-B projects. These initiatives aim to expand educational infrastructure, and ensuring legally sound land acquisition is a fundamental requirement. By maintaining a standardized approach to land documentation, these projects operate with legal clarity and transparency, reducing the risk of ownership disputes or improper land records.

Adhering to these legal procedures not only streamlines the land donation process but also ensures that schools are built on officially documented land. This structured approach provides long-term security for educational institutions and safeguards the interests of both donors and authorities. By implementing these measures, voluntary land donations can effectively contribute to the development of school infrastructure, benefiting communities in a transparent and legally compliant manner.

Stakeholder Consultation with Landowners & Project Affected Persons (PAPs)

The project will leverage the use of Parent-Teacher School Management Committees (PTSMCs) for community consultation. These committees will include the community members along with school management to ensure the meaningful stakeholder engagement. These PTSMCs will also be leveraged to facilitate the community consultation specially with all the individual or collective owners of the land to be donated. These consultations will be mandated under the VLD procedure to ensure that the conditions of VLD are adequately communicated to the landowners and community members at the sitting stage. Project representatives will ensure that the details of Grievance Redressal Mechanism are adequately communicated with stakeholders and PAPs for submitting their complaints/grievances regarding VLD or Land acquisition.

The stakeholder consultation process for Voluntary Land Donation (VLD) ensures that owners and co-owners make fully informed, free, and voluntary decisions regarding their land contributions. Once the site for sub-project is finalized, the process begins with community meetings and individual discussions, where project representatives will clearly communicate and explain the purpose of the project, potential impacts, land requirements, and eligibility criteria

for VLD. Special attention is given to ensuring transparency, addressing concerns, and preventing coercion or undue pressure from local authorities or influential individuals. If the land is co-owned, all co-owners—including women, marginalized groups, and absentee owners—must be consulted individually, ensuring their full participation in the decision-making process. The consultation will also include discussions on potential economic impacts, grievance redress mechanisms, and alternative livelihood support if the donation affects income or resource access. Once consensus is reached, the agreement will be documented in writing, witnessed by neutral third parties, and publicly disclosed to avoid future disputes. The process remains inclusive, gender-sensitive, and compliant with the World Bank's ESS5 to uphold the rights and well-being of all land donors.

Documentation of Voluntary Land Donation

The documentation of Voluntary Land Donation (VLD) is a critical requirement under the World Bank's Environmental and Social Standard 5 (ESS5). Proper documentation ensures that land donations are truly voluntary, legally valid, and free from any coercion or adverse economic impact on donors. The process must be transparent, inclusive, and verifiable, with formal records maintained throughout the project lifecycle to prevent future disputes.

The documentation process for VLD includes a written agreement to be signed among the donor(s), School Education Department Balochistan (Project Implementation Agency), and independent witnesses. This agreement should clearly state that the Voluntary Land Donation conditions stated above, including but not limited to, that the land is voluntary donated, free from coercion, and does not result in any significant economic or livelihood loss, doesn't result in any physical displacement etc. The agreement must detail the size, location, and intended use of the donated land, along with an acknowledgment that the donor retains sufficient land for their needs. If the land is co-owned or under customary tenure, all co-owners must provide written consent, including women and marginalized groups. The agreement should also reference the minutes and attendance record of consultation(s) held with landowner(s) and stakeholders to ensure there feedback is incorporated. Pictorial evidence of these consultations, wherever culturally appropriate, should also be preserved for due diligence.

RP/ARP Approval and Preparation:

Upon the completion of the sitting stage E&S screening, the requirement of additional land to be acquired for the expansion of existing facilities or establishment of the new facilities will be determined. In case of requirement of private land acquisition, a Land Acquisition and IR screening checklist will determine the preparation of appropriate resettlement instrument based on the impacts. Given the scope of the project, it is anticipated that an Abbreviated Resettlement Plan will be prepared, however for significant adverse impacts resettlement plan will be prepared as per the principles and objectives, which will be outlined in the RPF. The RP/ARP will require

prior approval from the World Bank before the initiation of implementation of the resettlement activities. The resettlement procedure is required to be completed before the mobilization of the contractor at site. An eligibility and entitlement matrix has also been attached further in the ESMF, which will govern the eligibility of the PAPs for the compensation of lost assets. The detailed requirements will be further outlined in the RPF, following aspects are required to be covered under the resettlement instrument:

- Socio-Economic Survey
- Detailed Measurement Survey and Valuation of Lost Assets
- Resettlement Database
- Social Inclusion & Gender Impacts and Mitigation Measures
- Consultation with PAPs
- Information Dissemination relevant to IR and Mitigation Measures

Monitoring of Land Acquisition and VLD process:

The Project Management Unit (PMU) Environmental and Social (E&S) team will be responsible for continuous monitoring and oversight of all land acquisition and Voluntary Land Donation (VLD) activities to ensure compliance with the World Bank's ESS5 and the project's Environmental and Social Management Framework. The team will conduct regular field visits, stakeholder consultations, and assessments to verify that land acquisition and VLD processes remain transparent, voluntary, and free of coercion. Monitoring will include reviewing land donation agreements, assessing socio-economic impacts on donors, ensuring grievance redress mechanisms (GRMs) are accessible, and verifying that all co-owners, including women and marginalized groups, have provided informed consent. The PMU E&S team will also maintain detailed records, track livelihood conditions, and report progress in the quarterly reports for the World Bank. If any adverse impacts or grievances arise, the team will coordinate corrective actions and mitigation measures to uphold the rights of affected individuals and ensure compliance with international safeguards.

Third Party Monitoring Agency:

An Independent or Third-Party Monitoring Agency or an individual with a team will carry out external monitoring of RP/ARP and report monitoring results to PMU and World Bank through annual monitoring reports or with a frequency as agreed with the World Bank. The external monitor will monitor and verify RP implementation progress and assess the achievement of RP objectives and compliance with World Bank's safeguards requirements through review of RP implementation progress reports, periodic internal monitoring reports and through, consultations with the APs and other stakeholders and impact assessment based on filed surveys. Based on the independent monitor's report, if significant issues are identified, a corrective action plan will be prepared, reviewed, and approved by World Bank and disclosed to affected persons.

Safeguards for Vulnerable Donors

To prevent the exploitation of vulnerable groups, the following safeguards must be ensured:

1. Exemption for Vulnerable Groups: Individuals from vulnerable groups should not donate land unless they directly benefit from the project. Vulnerable groups include:
    a. Households below the poverty line (with valid government-issued proof)
    b. Women-headed households who may lose shelter or livelihood
    c. Handicapped persons who may lose shelter or livelihood
2. Informed Consent: All potential donors must provide free and informed consent through meaningful consultations conducted in good faith.
3. Separate Discussions: Special consultations should be held with vulnerable donors, such as women, elderly individuals, and orphans, to ensure they are not coerced into donation.
4. Verification of Encumbrances: The project team must verify that the land is free from mortgages, leases, or other restrictions that could affect its transfer.
5. Protection of Tenants and Laborers: Land donation should not result in the displacement of tenants or bonded laborers, if any.
6. Respect for Cultural and Religious Practices: Land that is traditionally or customarily used for religious or cultural purposes must not be donated.

Resettlement Policy Framework (RPF)

A comprehensive Resettlement Policy Framework (RPF) will be developed later to address potential issues related to land acquisition, voluntary land donation, restrictions on land use, and involuntary resettlement within the GRADES-B project. This framework will be formulated in alignment with the World Bank (WB) Environmental and Social Standard 5 (ESS5) on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement, as well as relevant national and provincial laws. The future RPF will also establish key principles and guidelines for resettlement planning, ensuring that both government policies and WB's ESS5 requirements are met.

Once specific subprojects and project components are identified, the RPF will be formally developed to assess potential risks and impacts based on project need. It will also propose appropriate mitigation measures to protect affected communities, especially vulnerable groups. The RPF will serve as a basis for subsequent Resettlement Action Plans (RAPs) or other required instruments, which will be finalized and approved by the World Bank before any activities involving displacement are initiated. This preliminary outline ensures that future resettlement planning remains systematic, transparent, and aligned with international best practices, while maintaining flexibility to adapt to project-specific conditions as they emerge.

5. Eligibility and Entitlement Matrix

APs losing land (agriculture, barren or houses), structures (residential or commercial), assets, or income, are entitled for compensation and rehabilitation subsidies, including a relocation subsidy, and a business losses allowance. The informal land users without traditional/recognizable rights and encroachers losing land will not be entitled to land compensation but will be provided compensation for their assets including structures, businesses and resettlement and rehabilitation assistance. The table below defines the eligibility and criteria for providing compensation and assistance for various types of resettlements impacts that are likely to be caused by the project.

Table 2 Eligibility and Compensation Entitlement Matrix

Type of Loss	***Specification***	***Eligibility***	***Entitlements***
1. LAND			
Permanent impact on arable land	**All land losses independent of impact severity**	**Owner (titleholder, or holder of traditional rights**	• *Land for land compensation through provision of plots of equal value and productivity as that of lost, or* • *Cash compensation at full replacement cost either through negotiated settlement between the IA and the landowners or assessed based on provisions of Section 23 of Land Acquisition Act 1894 (LAA) including fair market value plus damages/costs applicable free from taxes and levies plus 15% compulsory land acquisition surcharge from publication date of section-4 to the date of compensation.*
			• *If Board of Revenue (BoR) compensation falls below replacement cost (RC), the project will pay the differential as resettlement assistance to the APs to restore affected livelihoods.*
			• *Resettlement Assistance equivalent to six months of provincial government announced monthly minimum wages, if the impact is 10% or more of productive arable land.*
			• *Compensation commensurate to lease type and as appropriate for recovery of paid advance or paid lease amount for the*

		Leaseholder titled/untitled	*remaining lease period but up to two years maximum.*
			• *Crop compensation for standing crop with an additional crop (based on relevant cropping pattern/cultivation record) and other appropriate rehabilitation as transitional support under other entitlements.*
		Sharecropper / tenant (titled/untitled)	• *Cash compensation equal to gross market value of crop compensation (see crop compensation below) to be shared with the land owner based on the sharecropping arrangement.*
		Agriculture laborers	• *The agricultural laborers facing employment/wage loss because of land acquisition will be entitled to income rehabilitation allowance in cash equal to net value of one crop season based on relevant cropping pattern/cultivation record or 3 months officially designated minimum wage.*
		Encroachers	• *No compensation for land loss* • *Income rehabilitation allowance in cash equal to net value of annual crop production, including payment for crop loss, and other appropriate rehabilitation to be defined in the RPs based on project specific situation and AP consultation.*
Residential / commercial land	**All land losses independent of impact severity**	**Titleholder, or holder of traditional rights**	• *Cash compensation at full replacement cost (RC) including fair market value plus 15% compulsory acquisition surcharge all transaction costs, applicable fees and taxes and any other payment applicable* • *Lump sum Relocation grant per affected Household to cover transport expenses and livelihood expenses for one month (to be calculated on the basis of Cost of Basic Needs (CBN) per person).* • *Special assistance of one-time payment CBN for each female, disabled, elderly headed and very poor households.* • *If BoR compensation falls below RC, the project will pay the differential as*

			resettlement assistance to the APs to restore affected livelihoods.
		Lessee, tenant	• *Cash refund/payment at the rate of lease or house rent for remaining lease period or house rent*
		Renter/ leaseholder	• *Rent allowance in cash equivalent to 3-6 months' rent to be decided in consultation meetings with APs.*
		Non-titled user without traditional rights (squatters)	• *No compensation for land loss* • *Self-relocation allowance in cash equivalent to 3-6 months livelihood based on minimum wage rate, or as assessed based on income analysis.* • *Where required, additional support required ensuring improved standard of living to be determined through the social impact assessment.*
Temporary land occupation	**Land temporarily required during civil works**	**Owner, lessee, tenant**	• *Rental fee payment for period of occupation of land, as mutually agreed by the landowner and contractor;* • *Restoration of land to original state; and*
			• *Guaranteed access to structures (if any) and remaining land with restored infrastructure and water supplies.*
		Non-titled user	• *Guaranteed access to land and structures located on remaining land with restored access to water supplies for irrigation (if applicable)* • *Restoration of land to original state; and* • *Income rehabilitation support, i.e., compensation for lost crops/trees as per entitlements provided (refer crop and tree section below).*
2. STRUCTURES			
Residential, agricultural, commercial	**Partial Loss of structure**	**Owner (including non-titled land user)**	• *Cash compensation for affected structure (taking into account functioning viability of remaining portion of partially affected structure) for its restoration to original use) at full replacement cost computed at market rate for materials, labor, transport and other incidental costs, without deduction of depreciation.*

, public, community			• *Right to salvage materials from lost structure*
		Lessee, **Tenant**	• *Cash refund at rate of rental fee proportionate to size of lost part of structure and duration of remaining lease period already paid.* • *Any improvements made to lost structure by a tenant will be taken into account and will be compensated at full replacement cost payable as per agreed apportionment through consultation meetings.*
	Full loss of structure and relocation	**Owner (including non-titled land user)**	• *The AP may choose between the following alternatives:* • *Provision of fully titled and registered replacement structures at relocation site (if any) comparably of equal size and value as that of lost one including payment of all transaction costs, fees and taxes applicable under law or* • *Cash compensation at full replacement cost, including all transaction costs, such as applicable fees and taxes, without deduction of depreciation for age, for self-relocation.* • *In either case, AP has the right to salvage the affected structure.*
		Lessee, **tenant**	• *Cash refund at rate of rental fee proportionate to duration of remaining lease period;* • *Any improvements made to lost structure by lessee/ tenant will be taken into account and will be compensated at full replacement cost payable as per agreed apportionment through consultation meetings.*
	Moving of minor structures (fences, sheds, latrines etc.)	**Owner, lessee, tenant**	• *Cash compensation for self-relocation of structure at market rate (labor, materials, transport and other incidental costs, as required, without deduction of depreciation for age) or relocation of the structure by the Project.*

	Stalls, kiosks, cabins	**Vendors (including titled and non-titled land users)**	• *Allocation of alternative location comparable to lost location, or* • *Cash compensation for self-relocation of stall/kiosk at market rate (labor, materials, transport and other incidental costs, as required, without deduction of depreciation for age)*
3. CROPS			
Crops	**Affected crops**	**Cultivator**	• *Cash compensation (one- year crop) at current market rate proportionate to size of lost plot, based on crop type and highest average yield over past 3 years or as assessed through the Agricultural Department.*
		Parties to sharecrop arrangement	• *Same as above and distributed between landowner and tenant according to legally stipulated or traditionally/informally agreed share.*
4. TREES			
Trees	**Affected trees**	**Landowner/ Cultivator**	• *Cash compensation for fruit trees at current market rate of crop type and average yield (i) multiplied, for immature non-bearing trees, by the years required to grow tree to productivity or (ii) multiplied, for mature crop bearing trees, by the average years of crops forgone; plus, cost of purchase of seedlings and required inputs to replace trees.* • *Cash compensation for timber trees at current market rate of timber value of species at current volume, plus cost of purchase of seedlings and required inputs to replace trees.*
		Parties to sharecrop arrangement	• *Same as above and distributed between landowner and tenant according to legally stipulated or traditionally/informally agreed share*
5. RESETTLEMENT & RELOCATION			

Relocation Assistance	**All types of structures affected**	**All APs titled/untitled requiring to relocate as a result of losing land and structures**	• *The project will provide logistic support to all eligible APs in relocation of affected structures whether project-based relocation or self-relocation as applicable.* • *Subproject's impacts-based relocation- depending on the sub-project impacts i.e. if rehabilitation of flood-affected structures or improvement of rains-affected road goes beyond ROW then spatial extent will be different depending upon the subproject activities., APs will be provided with access to civic amenities including electricity, water supply and sewage as well as school and health center (if applicable).*
Security of tenure	**Replacement land and structures**	**All APs and tenants needing to relocate to project relocation sites.**	• *If APs are required to relocate to project relocation sites, they will be provided with secure tenure to the replacement land and structures.*
Transport allowance	**All types of structures requiring relocation**	**All APs and tenants required to relocate as a result of losing land and structures**	• *For residential structure a lump sum amount of Pakistan Rupees (PKR) 30,000 or higher depending upon the situation on ground.* • *For commercial structure or agricultural farm structure a lump sum amount of PKR 20,000 or higher depending upon the situation on ground.*
House rent	**All types of structures requiring relocation**	**All APs and tenants required to relocate as a result of losing land and structures**	• *Rental assistance as a lump sum amount computed on the basis of prevailing rental rate for a period as agreed between the AP and project team, to assist the APs in renting house or commercial structure.*
Transition allowance	**All types of structures**	**All APs and tenants**	• *On a case-to-case basis, transitional allowance equal to 3 months of recorded*

	requiring relocation	**requiredto relocate**	*income or equal to officially designated minimum wage rate.*
6. INCOME RESTORATION			
Impacted land-based livelihoods	**All land losses**	**All APs with land-based livelihoods affected**	• *Partial loss of arable land: APs will be provided support for investing in productivity enhancing inputs, such as land leveling, erosion control, irrigation infrastructure and farming tools, fertilizers and seeds etc., as feasible and applicable.* • *Full Loss of arable land: Project based employment for the willing APs will be worked out and included in bidding documents or training with additional financial support to invest as well as organizational/logistical support for establishing alternate means of livelihood.*
Restricted access to means of livelihood	**Avoidance of obstruction by subproject facilities**	**All APs**	• *Un-interrupted access to remaining agricultural fields, business premises and residences of persons in the project area will be ensured in consultation with the APs.*
Businesses	**Temporary business loss due to LAR or construction activities by Project**	**Ownerof business (registered, informal) This also includes hawkers and vendors.**	• *Cash compensation equal to lost income during period of business interruption up to 3 months based on officially designated minimum wage rate of the provincial government.*
	Permanent business loss due to LAR without possibility of establishing alternative business	**Owner of business (registered, informal) This also includes hawkers and vendors.**	• *Cash compensation equal to lost income for 6 months based on officially designated minimum wage rate; and* • *Provision of project-based employment or a training opportunity to one of the adult household members.*

Employment	**Employment loss (temporary or permanent) due to LAR.**	**All laid-off employees of affected businesses**	• *Cash compensation equal to lost wages at comparable rates as of employment record for a period of 3 months (if temporary) and for 6 months (if permanent) or in absence of record computed based on official minimum wage rate or* • *Provision of project-based employment or re- training, with additional financial as well as organizational/logistical support to establish AP in alternative income generation activity.*
7. PUBLIC SERVICES AND FACILITIES			
Loss of public services and facilities	**Schools, health centers, administrative services, infrastructure services, graveyards etc.**	**Service provider**	• *Full restoration at original site or re-establishment at relocation site of lost public services and facilities, including replacement of related land and relocation of structures according to provisions under sections 1 and 2 of this Entitlement Matrix.*
8. SPECIAL PROVISIONS			
Vulnerable Aps	***Livelihood improvement***	***All vulnerable APs including those below the poverty line, the landless, households headed by elderly, disabled, transgenders, women and children***	• *In addition to applicable compensation entitlements for lost assets, relocation and livelihood restoration, the vulnerable APs will be provided with:* • *Subsistence allowance for 3 months computed on the basis of officially designated minimum wage rate and other appropriate rehabilitation measures to be defined in the* • *RPs and consultations with APs.* • *Preference for provision of project-based employment.*

6. Implementation Schedule

The step-wise procedure for the implementation of the present procedure for VLD and Land Acquisition as outlined in this ESMF, is described in the Table below.

Steps	Description	Timing
Step 1	E&S Screening of the sitting stage attached as annexure in the ESMF, will determine if the additional land is required. The checklist will also determine if additional land will be acquired through VLD or private land acquisition.	Before the start of construction at new location.
Step 2	VLD checklist or Involuntary land resettlement will be filled based upon the selected type of land acquisition as per initial E&S Screening checklists.	After finalization of sub-project location
Step 3	Stakeholder Consultation with Land Owners & Project Affected Persons (PAPs) will be done by the project representatives leveraging the local PTSMCs	Once the the case is approved for VLD/Private land acquisition
Step 4	In case of VLD, documentation of Voluntary Land Donation will be done as per the procedure defined in the ESMF and RPF	After stakeholder consultation
Step 5	In case of private land acquisition, preparation & approval of RP/ARAP will be done as per the processes underlined in the ESMF before the implementation of RP/ARP. Prior approval from World Bank will be required for RP/ARP before the initiating implementation	Within one week of receiving IR checklist
Step 6	RP/ARP implementation (steps involved: confirmation of PAPs and the associated resettlement impacts; finalization of compensation amount; completing documentation requirements for making the payments; payment of compensation; addressing and resolving grievances; continued consultations and liaison with PAPs and other key stakeholders; complete documentation and reporting)	Before the physical implementation of subproject
Step 7	Monitoring of RP/ARAP implementation	During RAP/ARAP implementation

Step 8	Third Party Monitoring (TPM)	On annual basis

7. Grievance Redress Mechanism

The Grievance Redress Mechanism (GRM) for the GRADES-B and STEP-B project is designed to address grievances, queries, complaints, and feedback from project-affected parties in a transparent, timely, and accessible manner. The GRM ensures that concerns are addressed at multiple levels while maintaining compliance with the World Bank's Environmental and Social Standard 10 (ESS10). It is structured to handle complaints related to project services, procurement of goods and works, and teacher recruitment, ensuring that stakeholders have clear channels to seek redress.

The Grievance Redress Committees (GRCs) are established at three different levels to oversee grievance resolution.

1. GRC-I (Services) handles complaints related to education services, teacher recruitment, and community engagement and is chaired by the Additional Secretary (Development), Secondary Education, supported by key officials from the PMU.
2. GRC-II (Goods & Works) is responsible for grievances concerning procurement, construction, and infrastructure and is chaired by the Project Director, PMU-SED.
3. GRC-III (Complaint Redressal Cell - CRC) manages complaints related to teacher recruitment through the District Recruitment Committee (DRC) and is led by the Commissioner, alongside education officials at the divisional level.

Grievances/Complaints can be submitted via written applications, emails, phone calls, SMS, suggestion boxes, or in-person visits to designated GRM offices. The project provides dedicated grievance channels, including a landline (+92 81 2864293), SMS number (+92 333 2335339), and a designated office in Quetta for written submissions. Once a grievance is received, it is logged into a centralized system, where it is categorized into low-, medium-, or high-priority complaints based on severity. The grievances relevant to the Land Acquisition and Voluntary Land Donation can be lodged using these grievance redress channels where they will be mandated for resolution as per the projects GRM guidelines.

The acknowledgment and follow-up process ensures that all grievances are formally acknowledged within five days, with low-priority issues resolved by Grievance Focal Persons (GFPs) within 10 working days, while medium-priority grievances are handled by the PIU GRC. High-priority grievances, including legal violations, corruption, GBV, and serious environmental concerns, require urgent intervention by higher-level committees with response times set by the PIU GRC. Special provisions are made for GBV, SEA/SH-related complaints, which are processed

confidentially by dedicated female staff and referred to specialized service providers for health, legal, and psychosocial support, with the option for survivors to submit complaints anonymously. Additionally, a separate GRM for project labor will be developed under the Labor Management Procedures (LMP) in compliance with ESS2 to address worker rights, safety, and employment conditions.

Checklist # 1

Voluntary Land Donation (VLD) Process checklist

Name of school: _____BEMIS Code: _____

Level: Primary_____ Middle: _____ High: _____ District: _____

Sr. No.	Description	Checklist Yes=Y; No=N	Remarks
A	**Requirement for Voluntary Land Donation**		
	Area of land to be donated		Land donation plan
	Terms of land donation		Land donation agreement***
	Parties intending to donate land		List of donor parties in the village
	Any details that are relevant to why donation may be appropriate		Record of reasons for land donation appropriateness
B	**Determine the appropriateness of VLD**		
	Has the viability of all other alternative locations/ sites been considered?		Must be Yes
	Verify land is free of settlers, encroachers, or other claims or encumbrances		Must be Yes

	Ensure the landowner is not vulnerable*		Must be Yes
	VLD must not negatively impact households below the provincial poverty line.		Must be negligible
	Is the land obtained through VLD owned by a woman who is the family's sole earner?		VLD is not to be taken from the women-headed family.
	Does the VLD involve impacts on minority/ handicapped persons?		Must be negligible.
	If yes, what are the impacts on livelihood due to VLD in terms of percentage?		The percentage of impact on the livelihood must not exceed 5%.
C	**VLD Process Requirements**		
	The Titleholder should be holding more than the minimum prescribed land;		Minimum 5 kanals.
	Verify voluntary donation is not more than 10% of the area of the titleholder's holding		Must be Yes
	Verify impacts are minor and not requiring physical relocation of the titleholder		Must be Yes
	Have the project authorities confirmed that the land is appropriate for sub-project purposes?		Must be Yes
	Ensure land is appropriate for sub-project purposes and will not invite adverse social, health, environment, or safety impacts**		Must be Yes
	Verification of the voluntary nature of land donations must be obtained from each of the persons donating land.		Must be Yes
D	**Verify requirements of donation and formalization of donation in the village assembly**		
	Verify donation is voluntary and obtain notarized, witness statements in a village assembly		Must be Yes

	Ensure titleholder understands they will surrender the land title of donated land and will not have unauthorized access to the houses built on donated land and cannot claim priority treatment		Must be Yes
E	**Due diligence on land ownership and use**		
	Type of land rights in the project area		Land rights assessment
	Users of land or any occupying parties (Tenants or leaseholders etc.)		Users' identification
	Competing claims of ownership or use		Claims identification
	Structures and assets on the land including those of religious and cultural significance		Assets on the proposed land (loss of agriculture, livelihood, assets, loss of economic trees etc.)
	Encumbrances on the land		Encumbrances assessment (Legal/ financial, Loans etc.)
F	**Consultation and Disclosure in a Village Assembly**		
	Consult with land donors and ensure they understand the terms and conditions of the donation		Must be Yes
	Disclose information about the donation process		Must be Yes
	Disclose any potential negative impacts on the owner		Must be Yes
	Informed consent of person donating land		Consent Agreement
	Indicate the concerns raised, if any.		Document the concerns
G	**Monitoring and documentation**		
	Verify any land conflicts or conflicting land titling		Must be mentioned and avoided
	Establish informed consent of person donating land		Must be Yes and Documented

	Inform them they will be deprived of the title as well as any other right to use the land		Must be Yes and Documented
	They have the right to refuse to donate the land		Must be Yes and Documented
	Information about any other costs involved in the process which the owner has to pay.		Must be Yes and Documented
	They will be informed that neither they nor their family members will be able to get the land back after the mutation.		Must be Yes and Documented
	The intergenerational effect of the donation on their family, what they can do if they (or their family or heirs) want the land back.		Must be Yes and Documented
	The terms and conditions of the land donation must be mutually agreed upon and detailed in a written agreement.		Must be Yes and Documented
	Verify donors provide their informed consent		Must be Yes and Documented
	Monitor and document the donation process in monitoring reports		Must be Yes and Documented

Footnote:

* Vulnerable persons:

Households (with valid proof), as per provincial poverty line for rural areas;

Households without proof of the same and belonging to the following social categories:

Women headed households with women as sole earners;

Minority/ handicapped persons.

** adverse social, health, environmental, and safety impacts including but not limited to the potential social conflicts, community health, dust or air quality, occupational and community health, and safety respectively.

*** Land donation agreement will be signed between the donor and the beneficiary. President of the VRC and authorized representatives of the IP and SPHF will sign as witnesses.

Prepared By: **Endorsed By:**

Name: **Name:**

Signature: **Signature:**

Date: **Date:**

Checklist # 2

Land Acquisition and Involuntary Resettlement Checklist

Name of school: _____BEMIS Code: _____

Level: Primary_____ Middle: _____ High: _____ District: _____

Assessment Questions	Yes	No	Expected	Remarks
Has any AED been conducted at the proposed location by the government? Yes/No				
Describe the category of land being acquired from the categories below:				
Voluntary Land Donation (VLD)				
Government and LG owned land free of occupation (agriculture or settlement)				
Government or state-owned land (with economic and resettlement impacts)				
Describe the type of land acquired from the categories below:				
Private land				
Residential				
Commercial				
Agricultural				
Communal				

Others (specify in “remarks”).				
Name of owner/owners and type of ownership document if available.				
If land is being acquired, describe any structures constructed on it				
Residential structures				
Commercial structures (specify in “remarks”)				
Community structures (specify in “remarks”)				
Agriculture structures (specify in “remarks”)				
Public utilities (specify in “remarks”)				
Others (specify in “remarks”)				
If agricultural land is being acquired, specify the following:				
Crops and vegetables (specify types and cropping area in “remarks).				
Trees (specify number and types in “remarks”).				
Others (specify in “remarks”).				
Affected Persons (APs)				
Will any people be displaced from the land when acquired? Yes/No				
Number of APs				
Males				
Females				
Titled landowners				
Tenants and sharecroppers				
Leaseholders				
Agriculture wage laborers				
Informal Settlers (specify in remarks column)				

Vulnerable APs (e.g. women headed households, minors and aged, orphans, disabled persons, and those below the poverty line). Specify the number and vulnerability in “remarks”.				
Others (specify in “remarks”)				
Prepared By: **Name:** **Signature:** **Date:**				
Endorsed By: **Name:** **Signature:** **Date:**				