COMPETITIVE AND LIVABLE CITY OF KARACHI (CLICK)

SOCIAL MANAGEMENT FRAMEWORK

Final Report

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Local Government Department
Government of Sindh

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ABBREVIATIONS & ACRONYMS

AD	Assistant Director
ADP	Annual Development Program
AED	Anti-encroachment Drive
APC	Affected Person Committee
ARAP	Abbreviated Resettlement Action Plan
BHU	Basic Health Unit
BISP	Benazir Income Support Program
CC	Construction Contractor(s)
CE	Chief Engineer
CCIS	Citizen Complaint Information Centre
CLICK	Competitive and Livable City of Karachi
COI	Corridor of Impact
CSSR	Collective for Social Science Research
CPLC	Citizens Police Liaison Committee
DC	Deputy Commissioner
DCO	District Coordination Officer
DD	Deputy Director
DMC	District Municipal Corporation
DMS	Detailed Measurement Survey
DO(R)	District Officer (Revenue)
DOH	Department of Health
EHS	Environment, Health, and Environment
EPA	Environmental Protection Agency
FGD	Focus Group Discussion
GDP	Gross Domestic Product
GK	Greater Karachi
GOP	Government of Pakistan
GoS	Government of Sindh
GPI	Gender Parity Index
GRC	Grievance Redress Cell
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HH	Household
HRCP	Human Right Commission of Pakistan
IA	Implementing Agency
IBRD	International Bank for Reconstruction and Development
IDA	International Development Association
IFI	International Financing Institution
IMA	Independent Monitoring Agency
IP	Indigenous People
KE	Karachi Electric
Km2	Square Kilometer
KMC	Karachi Metropolitan Corporation
KNC	Kausar Niazi Colony

KSDP	Karachi Strategic Development Plan
KMC	Karachi Water & Sanitation Board
LAA	Land Acquisition Act, 1894
LAR	Land Acquisition and Resettlement
LC	Local Council
LG	Local Government
LGD	Local Government Department
M&E	Monitoring and evaluation
MD	Managing Director
MG	Million Gallons
MGD	Million Gallons per Day
MICS	Multiple Indicator Cluster Survey
MP	Mitigation Plan
NGO	Non-Governmental Organization
NRW	Non-Revenue Water
O&M	Operation and Maintenance
OSR	Own Resource Revenue
OP	Operational Policy
P&DD	Planning & Development Department
PAHs	Project Affected Households
Pak-EPA	Pakistan Environmental Protection Agency
PAP	Project Affected People
PBS	Pakistan Bureau of Statistics
PCR	Project Completion Report
PCRs	Physical Cultural Resources
PD	Project Director
PDOs	Project Development Objectives
PIU	Project Implementation Unit
PMU	Project Management Unit
PRRP	Project Risk Reducing Procedures
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
ROW	Right-of-Way
RPF	Resettlement Policy Framework
RS	Reconnaissance Survey
SE	Superintendent Engineer
SEPA	Sindh Environmental Protection Agency
SIA	Social Impact Assessment
SSMC	Social Safeguard Management Cell
SSU	Shared Services Unit
SMP	Social Management Plan
TA	Technical Assistance
TORs	Terms of References
ULC	Urban Local Council
UNDP	United Nations Development Program
WAF	Women Action Forum
WASH	Water, Sanitation and Hygiene
WB	World Bank

WHO	World Health Organization
XEN	Executive Engineer

Executive Summary

Introduction

The Social Management Framework (SMF) is aims to assess the potential social impacts of the envisaged subprojects to be financed under the Competitive and Livable City of Karachi (CLICK) Project and the ways to avoid, minimize or mitigate them through establishing clear procedures and methodologies for the planning, screening, review, approval and implementation of subprojects. SMF policy principles, which include transparency, inclusion, participation, social accountability and social safeguards, will be mainstreamed by adopting appropriate processes for social impact assessment and mitigation. The methodology employed for the preparation of the SMF includes review of secondary data and collection of primary data through social scans of the project area, consultations with key stakeholders and Focus Group Discussions (FGDs) with communities.

Project Description

The proposed CLICK Project will include a set of investments for institutional and policy reforms, and capacity building to improve service provision and address urban infrastructure deficiencies and institutional constraints to Karachi's urban development. The Project seeks to address challenges affecting Karachi's performance in urban management and provision of social infrastructure and basic services. The Local Councils (LCs) of Karachi, namely KMC, DMCs and District Council, have limited financial management capacity over major sources of revenue to finance critical infrastructure. The World Bank (WB) will provide annual performance-based grants to Karachi LCs upon achievement of specified institutional strengthening measures. LCs will use these grants to implement subprojects for provision of local-level infrastructure and municipal services within their respective mandates, such as drainage works, local roads, parks, and urban roads among others. In addition, these funds will be used for supply-side capacity building interventions for LCs in areas of financial management, project implementation, social and environmental management and to enhance metropolitan coordination between the LCs. To assist LCs in achieving the institutional strengthening measures, and to manage and implement the performance grants system, the project will also provide centralized capacity building and implementation and management support through the Local Government Department (LGD) of the Government of Sindh (GoS). The infrastructure and services subprojects to be financed will be selected on the basis of a comprehensive screening and risk reduction procedure.

Social Context and Baseline Conditions

Karachi is the largest and most populous city in Pakistan and 7th largest megacity in the world. According to the 2017 census the population of Karachi was estimated at 14.9 million, growing at a rate of about 2.49 percent per year. Karachi Division has six districts, and of these, East, West and Malir report substantially higher annual growth rates and high sex ratios indicating that there has been substantial in-migration to these districts. Between 1951 and 2017, Karachi has grown over 13 times, slightly higher than the urban growth in Pakistan.

Karachi's population is a diverse mix of various ethnic groups. The city has experienced an influx of immigrants, which has changed its demographics considerably, and has also impacted the balance of power between ethnic groups leading to a host of social issues. Karachi stands at number three among all the districts of the country in terms of having the

least poverty.[1] The metropolis has a poverty ratio of 4.5% on the Multidimensional Poverty Index (MPI). The incidence of poverty varies among the 18 towns and the cantonment areas within the metropolis. According to one estimate, there are 600 slums in Karachi and 50 percent of Karachi's population lives in informal settlements of various types.

In 2017, Karachi's literacy rate was 87 percent and in the national ranking Karachi stood at 59 in terms of school infrastructure and availability of facilities. Overall literacy rate in informal settlements or *Katchi Abadis* was 71 per cent with a significant gender gap of 76 per cent for males and 66 per cent for females. In comparison to the rest of Pakistan, Karachi has a high HDI and is number four in the national HDI ranking. The current infant mortality rate under 5 years [per 1000 live births] has improved to 59 and the maternal mortality to 180.

Karachi is the financial capital of Pakistan and generates approximately 65% of the total national revenue. At the provincial level, the city's share of provincial tax receipts is as high as 70%. Karachi's large-scale industrial sector employed 72.7% of the labor force and produced 74.8% of the total large-scale output of the province.

As one of Pakistan's fastest growing metropolises, Karachi is challenged by increasing demand for water and sanitation, solid waste management, storm water drainage and other municipal services, particularly in *Katchi Abadis* which face severe challenges for service delivery.

General Policy, Legal and Administrative Framework

A review of the existing legislations, policies and institutions involved was conducted to identify requirements and gaps in the relevant national and provincial legal and institutional arrangements that would hinder or guide the development of the project in line with the international laws and standards applicable to CLICK. It is important to ensure that the project is in line with Pakistan's international obligations since the country has signed various international treaties and conventions, and World Bank policies.

The Constitution includes provisions to protect the rights of individuals to private property, equal treatment to all citizens/ persons, without any distinction including on the basis of sex. The national and provincial laws protect peoples and environment through a number of legislations including for land acquisition, through fair and adequate compensation, for public infrastructure projects, gender development, labour related issues, and protection of cultural resources. A host of institutions are created at federal, provincial and local government levels for infrastructure development and provision of public services.

The World Bank's (WB) Operational Policies (OPs) address the social risks and harms that may derive from WB financed projects in order to avoid actions with undesirable effects. The Implementing Agency (IA) will comply with OP 4.01, OP4.11 and OP4.12 where impacts related to environment, cultural resources, involuntary resettlement, livelihoods and assets (including for non-title holders, encroachers, squatters etc.), acquisition of land or restrictions to natural resources may take place due to the Project.

Stakeholder Consultation

Meaningful consultation and engagement with stakeholders is critical to ensure that the views, interests and concerns of communities and institutional stakeholders are taken into account in the assessment of the potential impacts of the project. The potential social issues and risks

[1] https://tribune.com.pk/story/1144434/measure-impoverishment-karachi-third-least-poor-district/

discussed can be mitigated through identification of stakeholders, including communities that have a stake/interest in the project and those that will be affected by the project activities. Stakeholders involved communities, vulnerable/marginalized groups, service providers, government line departments, CSOs and academia.

The major concerns raised during the consultations were lack of water and sanitation services; irregular water supply; contamination in potable water supply mixed with waste water; health and hygiene issues; inadequate water draining system causing environmental and public health problems; inadequate municipal services; no or irregular service for solid waste collection at the household level; unsatisfactory response from and poor attitude of government officials towards service delivery, particularly in *katchi abadis*.

Proposed Methodological Framework for Subproject Screening

The purpose of this screening process is to determine which activities are likely to have negative social impacts and to determine appropriate mitigation measures for activities with adverse impacts. The outcome of the screening process will determine the extent of social considerations that are required prior to taking a decision to undertake project activities related to construction and rehabilitation works.

Social Screening is the first step in the assessment process. It confirms the need for social assessment by appraising the type of subprojects and its associated activities throughout the project lifecycle. Based on the screening findings, the IAs will categorize subprojects according to the degree of potential social risks and impacts. However, the project will not undertake any Category A" subproject and will be limited only to Category B and C. This will be followed by the development of appropriate instruments to plan and implement the mitigation measures (RAP/ARAP) for the social impacts.

Social Impact Assessment (SIA) will be carried out for proposed subprojects when social screening will identify potential social safeguard issues. Social Management Plan (SMP) for the subprojects is intended to ensure efficient social management of the subproject activities. Physical Cultural Resource Management Plans (PCRMPs) will be prepared to manage potential impacts on cultural resources. These instruments will also establish whether a subproject will trigger a safeguard policy, and what mitigation measures need to be set in place. The social screening process illustrate stages of the social screening leading to the review and approval of the CLICK project activities.

Social Impacts and Risk Mitigation

The project is expected to promote and contribute to the overall socioeconomic development of the local areas, benefitting local communities and in particular the vulnerable and marginalized groups. The significant anticipated benefits include development of municipal infrastructure, enhanced access to municipal services, and improved livability. The rehabilitation of existing storm water drainage and sewerage services and improved management of solid waste and concomitant public and environmental health improvements will spread benefits among all inhabitants of the city, including the poor and especially women, for whom protecting their houses and household effects from urban flooding and waste management are among the most critical needs.

Unlike the above positive impacts and benefits of the Project, the proposed investments for infrastructure improvement can also result in adverse social impacts. While, the exact locations of the subprojects are not known, a few subprojects may have land acquisition

(small-scale) and livelihood impacts, which will be identified and mitigated prior to implementation of the subprojects. The following mitigation measures will be implemented:

- Land Acquisition and Resettlement (LAR) impacts will be avoided, minimized and fully compensated. Additional assistance measures, if any, necessary to provide opportunities for livelihood restoration for Project Affected Persons (PAPs), particularly women and vulnerable groups, will be taken.
- IA will prepare a GBV/Gender Action Plan to mitigate negative impacts based on SIA findings and propose enhancement measures;
- Cultural resources uncovered during land clearing will be handed to the relevant authorities to be preserved. Important cultural sites will be marked and fenced during land clearing;
- IA will ensure assessment of, and development of requisite mitigation measures to address, health risks and potential impacts on the safety of affected communities during the design, construction, operation, and decommissioning of subprojects.

Stakeholder Participation and Community Engagement

IA recognizes stakeholder engagement as an ongoing process and will devise and implement a comprehensive consultation, participation and information disclosure process to ensure the engagement of stakeholders who are directly or indirectly involved in the project, including civil society, and facilitate their informed participation. Stakeholders' identification and mapping is the first step for examining the relative influence (power, proximity) of a stakeholder group on the subproject functioning. The findings from every consultation should be analyzed, reported and discussed with representative stakeholder groups. It is important to monitor stakeholder engagement to ensure that the consultation and disclosure efforts are effective.

Community participation has different dimensions. IAs should develop an institutional policy on Citizen Engagement (CE) guiding principles that should include diversity, communication, inclusivity, transparency and accountability, continuous improvement, resources, and engaging partners. It should identify a staff lead (champion) within the IA that should be responsible for both leading and facilitating the community engagement process through institutionalized mechanisms, conducting citizens satisfaction survey by preparing Citizens Report Card, and training officials involved in public participation.

Gender Development Framework

This study corroborated findings from recent studies on Karachi which highlight the structural and social inequalities that make women deeply vulnerable to problems associated with municipal services and urban infrastructure. It finds that existing gender norms restrict women's mobility and agency in these areas. It also shows how lack of formal public service delivery processes leads to reliance on market-based solutions and on informal actors and committees, which are largely male-dominated and more accessible to higher-income families. The health impact of unclean water sources falls most severely upon women and children. Findings also corroborate research which reveals that the absence of women amongst service providers further alienates women users from utilities and disempowers them as consumers.

The findings of this assessment formed the basis to understand potential impacts which are focused on provision of infrastructure and other basic urban services in Karachi. It is expected that improved urban services in localities such as those described in this report could positively mitigate some of the uneven negative impacts of the current situation on women. In this regard, the study concludes with specific suggestions for how the project could ensure that women's citizenship rights and community status are empowered through its design leading to an improvement in access and use of utilities by women.

Grievance Redress Mechanism (GRM) Framework

GRM is a tool for early identification, assessment and resolution on any complaints or disputes regarding the activities and physical investment of the Project. The overall objective of the grievance redress procedure is to ensure that complaints and grievances from local stakeholders are handled in a systematic and transparent manner in order to promote mutual confidence and trust during various stages of project development and operation.

The web-based system of KMC's Complaint Cell is available for citizens in Karachi to lodge their complaints. However, communities are not satisfied with the current compliant redress system. It is important for this Project to strengthen the current GRM system that is already in place in KMC to better manage and address complaints. LCs need to expedite the process of grievance resolution through developing systems and fixing responsibilities at various levels and to provide resources to build the capacity of the complaint cells. A set of procedures for receiving, recording, handling and timely resolving complaints should be available in the GRM.

To address these issues the proposed framework, which is in line with WB standards, require Grievance Mechanisms to provide a structured way of receiving and resolving grievances. The standards emphasize that complaints should be addressed promptly using an understandable and transparent process that is culturally appropriate and readily acceptable to all segments of affected citizens, and is at no cost and without retribution. The mechanism should be appropriate to the scale of impacts and risks presented by a project and beneficial for all stakeholders. The mechanism must not impede access to other judicial or administrative remedies.

Labor and Working Condition Management Framework

This framework describes the requirements for CLICK with regard to labor and working conditions applicable during the implementation phase of the Project. It aims to ensure the management and control of activities that may pose labor-related risks. This framework sets out potential impacts and consequences and describes how they will be mitigated. LCs will use commercially reasonable efforts to require contractors, or other intermediaries procuring labour to apply comparable standards.

LCs will ensure that standards related to catering, camp management and associated logistics operations are ensured in accordance with the international best practices. Upholding the requirement to comply with applicable laws, regulations, permits, licenses, and other legally binding requirements/agreements is a major priority. Maintaining operations that protect safety, health, and the environment and that conform to laws and regulations requires careful selection, placement, ongoing assessment, and proper training of employees. Development of appropriate prevention (or enhancement), control, mitigation, and monitoring strategies related to potential socioeconomic issues/impacts is essential.

Institutional Arrangements

The social safeguards activities involve distinct roles, functions, and various agencies. An inter-agency Project Steering Committee (PSC) shall be established by GoS to provide policy direction and strategic oversight and review implementation progress on a regular basis. LGD will have overall responsibility for implementing the performance-based grants system for LCs. A Project Management Unit (PMU) will manage these functions on behalf of LGD. Karachi LCs will directly implement infrastructure subprojects using the funds provided by Performance-based grants. Thus, Karachi LCs will be the Implementing Agencies (IAs) for infrastructure development works and, along with LGD, have the overall responsibility for the implementation of SMF with World Bank approval. LGD is the overall Implementing Agency (IA) for this project. The PMU in LGD will collect information and progress on social safeguards compliance through a Social Safeguard Management Cell (SSMC) which will be tasked with day-to-day project related safeguards activities at project and subproject level. LGD will engage Supervisory Consultants (SC) to assist LCs and their PIUs in safeguards planning and preparation, and implementation and monitoring of SMF. The SMF management requires support from various line departments and government agencies. LGD will hire an Independent Monitoring Agency (IMA) or an individual expert (with team) to conduct independent monitoring and evaluation for the implementation of ARAP. Project Affected Persons Committee (PAPC) of male and female PAPs will be established at each subproject site through community mobilization.

Monitoring and Evaluation

Monitoring and evaluation will be undertaken during the CLICK implementation phase to verify the effectiveness of impact management, including the extent to which mitigation measures are successfully implemented. The overall aim of the subproject monitoring will be to ensure that CLICK is implemented in such a way that enhances, or at least mitigates, social impacts in real terms relative to their pre-subproject levels. To attain these objectives, monitoring should be done at two levels, internal and external monitoring.

The SSMC staff will make regular field visits to monitor the safeguard implementation activities in line with the procedures and guidelines provided in this SMF and RPF. SSMC will also assess the compliance status of safeguards documents prepared by the supervisory consultants with respect to the national regulatory and WB safeguard policy requirements. LGD will hire an IMA to objectively evaluate the degree of success or failure of mitigation measures at regular intervals of the subproject implementation. Independent monitoring will be carried out biannually during the implementation of SMF covering SIA/SMP/ARAP, PCRMP and its results will be reported to the PMU, SSMC, PIUs and WB in monthly and quarterly reports.

Capacity Building for Safeguards Compliance

IAs will require an enabling environment together with resource capability to be able to manage and monitor social safeguards through (i) inducting additional qualified and dedicated resource for management of safeguards, (ii) plan and implement capacity development program for PMU and PIU staff for their better understanding of the project-related social issues and LAR management; and (ii) to strengthen the role of PMU and PIU in implementation of mitigation measures and subsequent monitoring.

An institutional capacity development strategy and project specific capacity plan may be developed by the IAs which specifically identifies the shortcomings in the capacities at different levels and suggests relevant measures to overcome them.

The IAs will organize trainings focused on various topics relevant to the social management process to be accomplished by organizing awareness raising/sensitization programs, hands-on workshops (on application of SMF), training programs related to technical and thematic areas related to social issues in subproject implementation. The training programs will focus on resettlement and rehabilitation and social impact mitigation measures.

Budget for SMF Implementation

The budget of the SMF will cover activities ensuring the implementation of the SMF. It will also cover the staff for SSMC in PMU and PIIUs of the estimated five years of the project duration. The SMF provides for capacity development of the LCs in social management in subproject cycle. The SMF, has therefore, includes an indicative budget of PKR 685.66 million for social risk mitigation, hiring staff for SSMC, Independent monitoring/Third Party Validation and contingencies.

Appendix A: The Resettlement Policy Framework

Introduction

The Resettlement Policy Framework (RPF) defines the legal and policy framework, eligibility criteria and entitlements for project affected persons (PAPs) to ensure fair and timely compensation, relocation and rehabilitation, grievance redress as well as monitoring and reporting. The detailed scope of all subprojects of the identified components have not yet been defined, it is anticipated that the proposed investment in targeted districts and towns of Karachi will not require any involuntary resettlement or major land acquisition for rehabilitation and improvement work. This RPF, prepared and endorsed by the IAs, fulfils OP 4.12 requirements pertaining to resettlement policy, principles, objectives and implementation procedures and complies with pertinent national laws and regulations.

Project Risk Reducing Procedure

The RPF describes in detail the context, design and risks associated with the CLICK project and excludes high risk sub-projects. It summarizes: (i) measures that have been built into the project design to avoid risks in the complex context of Karachi; and (ii) multiple layers of risk mitigation measures that have been put in place to further reduce the environmental and social risks associated with the project associated with the ongoing anti-encroachment drive, which have been addressed, upfront, in the design of the project and will be thus avoided. It also suggests in the context of the project-level risk avoidance measures to be built into the design, as well as proposes the additional risk mitigation measures in compliance with the Bank's OP 4.12 including system-level measures. A detailed procedure, the Project Risk Reducing Procedure (PRRP) has been developed to avoid project-related risk. The PRRP includes coordination and monitoring of actions under the ongoing anti-encroachment drive (AED) in Karachi during project implementation, preparation of safeguards documents, screening of sub-projects eligibility and capacity building.

The PRRP also provides a recommendation to avoid social and environmental risks, in particular, risks associated with the ongoing AED in Karachi. The robust, multi-step screening mechanism, together with capacity building support, monitoring and coordination of AED, proactive stakeholder engagement, as well as robust GRM, provide a comprehensive set of measures to avoid environmental and social risks associated with the project. Legal covenants built into the Legal Agreement related to the compliance with safeguards instrument, and in particular, with the PRRP screening mechanism of AED, provide additional layers of

assurance that the CLICK will be implemented in a manner consistent with the Bank Safeguards Policies.

Legal and Policy Framework

This RPF is designed on the basis of the regulatory framework of Pakistan's for Land Acquisition Act 1894 and the World Bank Operational Policies, specifically OP4.12. Remedial measure were proposed to reconcile Pakistan's legal and regulatory system for LAR (LAA 1894) and World Bank's OP 4.12 in order to address the gaps between the two systems. In Pakistan, LAA 1894 regulates the land acquisition process procedures for acquiring private land for projects and payment of compensation. The objectives of OP 4.12 is to avoid involuntary resettlement wherever possible; to minimize involuntary resettlement by exploring project and design alternatives; to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre-project levels; and to improve the standards of living of the displaced poor and other vulnerable groups. The Section also details the compensation eligibility and entitlement for the categories of the eligible persons to be affected due to subproject activities.

Social Impact Assessment

Preparation of RAP for each subproject with LAR impacts will require a detailed social impact assessment which will be initiated at early stage as part of planning and design of all subprojects to be implemented. The social impacts assessment will include initial LAR impact assessment, screening and IR categorization of subprojects, preparation of inventory of lost assets (ILA) followed by a detailed measurement survey (DMS) and census of PAPs, a socio-economic survey (SES), and valuation of lost assets (VLA). The results of the IR and Social Impact Assessment will be presented in aggregate form in the subproject RAP, and impacts inventory linked to respective PAPs will be annexed in the RAP document. The census inventory of lost assets as well as socio-economic base line of PAPs will be consolidated and computerized in a database form for each subproject RAP.

Consultation with Key Stakeholders

Meaningful consultations will be carried out particularly with PAPs, communities and other key stakeholders during preparation and implementation of RAP of each subproject to solicit their views, identify their needs and preferences for compensation and rehabilitation measures and relocation. The IA will devise and implement a comprehensive consultation, participation and information disclosure strategy to ensure the stakeholders who are directly or indirectly involved in the project including PAPs, marginalized/vulnerable beneficiary groups, government officials and civil society for each subproject identified as having involuntary resettlement impact are meaningfully consulted during the entire project cycle. . The RPF and the subproject RAP will be disclosed on World Bank and IA's websites before appraisal of the project. Meanwhile, the RPF and the subproject RAPs will be disclosed to PAPs and other stakeholders by placing the copies at accessible including the relevant PIU and District and Town offices along the Project corridor.

Institutional Arrangement

LGD will ensure that all compensation, resettlement and rehabilitation activities are carried out satisfactorily before the disbursement of funds for construction work to commence. LCs will will be responsible for implementing the safeguards instruments for all subprojects and for maintaining regular contact with local community and authorities. To address the limited

implementation capacity of LC in implementing RPF a dedicated Social Safeguard Management Cell (SSMC) will be established within the LC and to be nested in PIU. LGD will play a central role in ensuring that LCs apply and implement the PRRP and its associated procedures in the screening, selection, design and implementation of subprojects. It will ensure compliance with the WB safeguards policies and the SMF/RPF. It will manage and provide a package of centralized technical assistance (TA) and capacity-building support to LCs to assist them in achieving performance measures. It will provide assistance to LCs in screening, selection, design, supervision and monitoring of subprojects, through in-house expertise and by hiring consultancy services. It will also provide assistance to all LCs in the preparation and implementation of environment and social management plans / safeguard instruments for LCs' subprojects consistent with the screening procedures (e.g. PRRP) and with the SMF/RPF.

Grievance Redress Mechanism

A three tiered Grievance Redress Mechanism (GRM) will be set up under CLICK to address grievances arising from social and LAR impacts. The purpose of the GRM with regard to subproject is to receive, review and resolve grievances from PAPs and facilitate the fair implementation of this RPF and the related subproject RAPs. A Grievance Redress Committee (GRC) will be established in the PIU to redress grievances which were not resolved at the local level. The court of the law will be the last resort, if the above option are exhausted.

Compensation, Income Restoration and Relocation

PAPs losing land, structures (residential or commercial), assets, income, crops, trees are entitled for compensation and rehabilitation subsidies, including a relocation subsidy, and a business losses allowance. Titleholders (recorded land owners) or those having land rights recognizable under local law or custom will be compensated through cash compensation at full replacement costs. Those 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 crops, trees, structures, businesses and resettlement and rehabilitation assistance as per the below entitlement matrix prepared for this RPF.

Table 1: Eligibility and Compensation Entitlement Matrix

Type of Loss	Specification	Eligibility	Entitlements
1. LAND			
Permanent impact on arable land	All land losses independently from 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 (RC[2]) either through negotiated settlement between the EA and the land owners or assessed based on provisions of Section 23 of LAA including fair market value plus damages/costs applicable free from taxes and levies plus 15% compulsory land acquisition surcharge (CLAS) from publication date of section-4 to the date of compensation.

[2]Refer to OP 4.12

Type of Loss	Specification	Eligibility	Entitlements
			• If BoR[3] compensation falls below RC, the project will pay the differential as resettlement assistance to the PAPs to restore affected livelihoods. • Resettlement Assistance if the impact is 10% or more of productive resources including arable land.
		Leaseholder titled/untitled	• Compensation commensurate to lease type and as appropriate for recovery of paid advance or paid lease amount for the 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 and other appropriate rehabilitation to be defined in the RAPs based on project specific situation and PAP consultation.
Residential/ commercial land	All land losses independently from 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 • If BoR compensation falls below RC, the project will pay the differential as resettlement assistance to the PAPs to restore affected livelihoods. • Additional compensation to be worked out in consultation with PAPs if the loss is 10% or more of productive resources including land.

[3] Board of Revenue, provincial agency with a mandate to approve compensation rate/amount

Type of Loss	Specification	Eligibility	Entitlements
		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 PAPs.
		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 parties; • 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, public, community	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. • Right to salvage materials from lost structure • For vulnerable households, provide legal and affordable access to adequate housing to improve their living standard to at least national minimum standard. • Any improvements made to a structure by a lessee/tenant will be taken into account and will be compensated at full replacement cost payable through apportionment between owner and the tenant as agreed at consultation meetings.

Type of Loss	Specification	Eligibility	Entitlements
		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 PAP 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 any case, PAP 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, and • 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	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 respective Agricultural Departments. • Additional compensation to be worked out in consultation with PAPs if the loss is 10% or more of productive resources including land.

Type of Loss	Specification	Eligibility	Entitlements
		Parties to sharecrop arrangement	• Same as above and distributed between land owner and tenant according to legally stipulated or traditionally/informally agreed share
4. Trees	Affected crops	Land owner/ 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 land owner and tenant according to legally stipulated or traditionally/informally agreed share
5. RESETTLEMENT & RELOCATION			
Relocation Assistance	All types of structures affected	All PAPs titled/untitled requiring to relocate as a result of losing land and structures	• The project will provide logistic support to all eligible PAPs in relocation of affected structures whether project based relocation or self-relocation as opted by the PAPs. • If project based relocation, PAPs 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 PAPs and tenants needing to relocate to project relocation sites.	• If PAPs 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 PAPs and tenants required to relocate as a result of losing land and structures	• For residential structure a lump sum amount of Rs. 15,000/ or higher depending upon the situation on ground. • For commercial structure or agricultural farm structure a lump sum amount of Rs. 10,000/ or higher depending upon the situation on ground.
House rent	All types of structures requiring relocation	All PAPs and tenants required to relocate as a result of	• Rental assistance as a lump sum amount computed on the basis of prevailing rental rate for a period as agreed between the PAP and project team, to assist the PAPs in renting house or commercial structure.

Type of Loss	Specification	Eligibility	Entitlements
		losing land and structures	
Transition allowance	All types of structures requiring relocation	All PAPs and tenants required to relocate	• On a case to case basis, transitional allowance equal to 3 months of recorded income or equal to officially designated minimum wage rate.
6. INCOME RESTORATION			
Impacted land-based livelihoods	All land losses	All PAPs with land-based livelihoods affected	• Land for land compensation through provision of plots of equal value and productivity as that of lost and if land based compensation is not possible non-land-based options like built around opportunities for employment or self-employment will be provided in addition to cash compensation at full replacement costs for land and other assets lost. The following entitlements will apply if replacement land is not available or is not the preferred option of the PAPs: • **Partial loss of arable land:** PAPs 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 PAPs 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 PAPs	• Un-interrupted access to agricultural fields, business premises and residences of persons in the project area will be ensured in consultation with the PAPs.
Businesses	Temporary business loss due to LAR or construction activities by Project	Owner of 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 tax record or, in its absence, comparable rates from registered businesses of the same type with tax records, or computed based on officially designated minimum wage rate.
	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 tax record or, in its absence, comparable rates from registered businesses of the same type with tax records, or computed based on officially designated minimum wage rate And

Type of Loss	Specification	Eligibility	Entitlements
			• Provision of project based employment to one of the grown household member or re-training with opportunity for additional financial grants and micro-credit and organizational/logistical support to establish PAP in alternative income generation activity
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 PAP 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 PAPs	Livelihood improvement	All vulnerable PAPs including those below the poverty line, the landless, the elderly, women and children	• In addition to applicable compensation entitlements for lost assets, relocation and livelihood restoration under section,1 to 7 the vulnerable PAPs 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 RAPs based on income analysis and consultations with PAPs. • Preference for provision of project based employment.

Land Acquisition and Resettlement Financing and Implementation

GoS will finance the total cost of LAR under CLICK from its own funds. The allocation and provision of the financial resource is responsibility of the IA for effective management of project LAR requirements including acquisition of ROW, establishment of relocation/resettlement sites, payment of compensation for acquired assets, and implementation of income restoration measures. All assessed LAR costs should be fully incorporated in the project PC-I to be approved by the government. Both the LAA (1894) and World Bank OP 4.12 require that PAPs are compensated before the acquisition of ROW and commencement of construction works.

Monitoring, Evaluation and Reporting

Monitoring will involve (i) compliance monitoring to ensure that implementation is on schedule and problems are dealt with on a timely basis; (ii) The social impacts monitoring of the project and whether PAPs are able to restore and preferably improve their pre-project living standards, incomes, and productive capacity utilizing baseline information established through the socio-economic survey undertaken during project preparation; and (iii) overall monitoring to assess status of PAPs. The LAR tasks will be monitored internally and externally. Internal monitoring will include day to day tracking progress about LAR planning and implementation activities including compensation payment progress, rehabilitation and income restoration measures implemented. The PIU will be responsible for internal monitoring and share RAP implementation progress and periodic monitoring reports with the IA and the World Bank.

PIU of IE should monitor, map, and regularly update the locations of the AED conducted on or after the cut-off date. The monitoring of the government's AED should include not only locations, but a categorization according to the typology and hierarchy described in the Introduction Section above as to assess the nature and extent of impact. Monitoring of AED should also document the compensation or relocation of affected people in the future, and the response of people who have been offered such compensation or relocation.

In case of subproject with significant IR impacts, IA through PIU will engage the services of an independent agency or consultant to undertake external monitoring and evaluation of the RAP implementation. The external monitor will monitor and verify RAP implementation progress and assess the achievement of RAP objectives and compliance with World Bank's safeguards requirement's through review of RAP implementation progress reports, periodic internal monitoring reports and through, consultations with the PAPs and other stakeholders and impact assessment based on filed surveys.

1 INTRODUCTION

1.1 Overview

1. Karachi is the largest and only megacity city of Pakistan, and the country's main financial center and seaport. It contributes up to 15% of national GDP as well as major tax revenues. It is one of the fastest growing cities in the country, with an average growth rate of 3.5%. Its population grew from 9 million 1998 to an estimated 16 million today, primarily through migration. Karachi ranks among the bottom 5 least livable cities (out of 140) in the world, according to the Global Livability Index of the Economist Intelligence Unit. During the last few decades, the city has suffered infrastructure neglect and has experienced lower access and quality of urban services. The Karachi City Diagnostic / Transformation Strategy (published by WB) estimates an investment requirement of at least US$9-10 billion over the next 10 years to close the infrastructure and services gaps.

2. This project will seek to address some of the identified critical constraints in Karachi to improve its livability and competitiveness. It will do so through the following interventions: improving institutional capacity and performance of Karachi LCs and selected agencies such as SSWMB; optimizing allocation of scarce public resources by fostering greater private investment in city infrastructure and services; improving the business and investment environment for private sector; enhancing municipal service delivery in an integrated way involving key institutions; and setting the base for sustainable city financing. Karachi faces substantial challenges on urban management, service delivery and business environment, which this project cannot alone fully resolve. The project will begin to address these constraints by selectively tackling critical bottlenecks. While the scale and complexity of challenges is significant, it aims to tackle some of these constraints in an incremental and systematic way through selected interventions. Activities under the project will help put the city on a long-term path towards achieving adequate service provision and a competitive business environment.

1.2 Social Management Framework

3. Social considerations and the avoidance of social issues will form a central part of the identification and design of sub-projects under CLICK. As a part of a consolidated Environment and Social Framework, the SMF has been prepared as the specific locations and detailed information about the subprojects will not be known till the time of implementation. The framework approach is appropriate in this situation to provide guidance during the selection and design of subprojects, and the planning of mitigation measures to ensure effective application of the World Bank's safeguard policies and the national and provincial regulatory requirements.

4. In compliance with Safeguard Policies set by the World Bank (WB) as well as Pakistan's legal regulations which stipulate that the financing of development plans and sub-projects would be subject to an assessment and mitigation of potential social impacts, the SMF identifies policy triggers, screening criteria, social impacts and mitigation measures to mitigate the identified risks for the proposed sub-projects.

5. This SMF includes a Resettlement Policy Framework (RPF) which describes mechanisms for addressing the possible loss of land, livelihood and sources of livelihood, temporary disruption of services and income, and temporary restrictions on access to facilities while the construction work will be operational in the Project corridor (refer to **Appendix 1**). The SMF and RPF also provide guidance on how to address impacts of the ongoing anti-

encroachment drive. The SMF also includes guidance on the preparation of grievance redress development framework, consultation mechanism, capacity-building measures and a monitoring mechanism.

1.2.1 Purpose and Scope of Social Management Framework (SMF)

6. The SMF spells out the process of assigning social categories for the proposed sub-projects and outlines the institutional arrangements and timeframe for the implementation of mitigation and monitoring measures. This framework will be used by the IA to ensure that all social safeguards are adequately addressed and that the relevant capacity and training needs are established for the recommended measures to be implemented effectively. The SMF is designed to ensure that the social development principles are mainstreamed into the project design.

7. The objectives of the SMF include:

- Assessment of potential adverse social impacts of the envisaged sub-projects to be financed under CLICK and possible ways to avoid, minimize or mitigate them;
- Establishment of clear procedures and methodologies for the planning, review, approval and implementation of sub-projects;
- Development of a social screening system for the sub-projects;
- Specification of the roles and responsibilities and necessary reporting procedures for managing and monitoring social concerns related to the sub-projects;
- Delivery of trainings, capacity-building activities and technical assistance needed to successfully implement the provisions of the SMF; and
- Establish the project funding required to implement the SMF requirements.

8. The application and implementation of the SMF, therefore, will:

- Support the integration of social aspects into the decision-making process at all stages related to planning and design by identifying, avoiding and/or minimizing adverse social impacts early-on in the project cycle.
- Enhance the positive/sustainable social outcomes through improved/appropriate planning, design and implementation.
- Build the capacity of the IA to take up and coordinate responsibilities related to the application and implementation of the SMF, including preparation of Social Assessment and Management Plans (if required).
- Provide guidelines and procedures for further consultations during the implementation of the project.
- Provide a systematic guidance to address potential risks and to enhance quality, targeting, and benefits to the surrounding communities based on adjacency principles.
- Ensure that stakeholders, irrespective of whether they benefit from or are adversely affected by the Project interventions, are well-informed and are able to participate in the sub-project's implementation.

- Support compliance with applicable national and provincial legal/regulatory requirements as well as with the requirements set forth in the relevant World Bank policies.
- Minimize adverse impacts on cultural property and other common property resources.

1.2.2 Scope of SMF

9. The SMF will serve as a social safeguards instrument to provide a framework to both the relevant government agencies and the private investors for preparing and implementing infrastructure projects. It identifies the responsibilities of project stakeholders, procedures for social safeguards screening, review and approval, monitoring and reporting requirements, as well as plans to enhance institutional capacity. The SMF will cover the following aspects as envisaged in the TORs:

- An introduction which describes the purpose, objectives, principles and methodology;
- Description of the Project — a summary of approximate nature and scale of the subprojects;
- Description (in appropriate level of detail) of socioeconomic baseline conditions for the anticipated project areas;
- Summary of the regulatory framework (including key national policies and laws) and a gap analysis of regulations, in addition to measures to bridge the gaps between national legislation and World Bank safeguards;
- Methodology for screening, categorization and typology of subprojects; instruments required to be prepared for policy compliance for due-diligence-related management and decision making;
- Summary of the types of risks and impacts that may result from the anticipated sub-project activities interacting with social baseline typologies, and the probability, magnitude, duration and geographic scope these risks and impacts could assume; the assessment would include cumulative and induced impacts;
- Appropriate frameworks for the management of impacts related to resettlement and land requirements, resettlement policy framework, gender, stakeholder consultation, labor management, etc.
- Range of appropriate safeguards instruments for anticipated impacts to be identified with description, required expertise, timeframe, review and clearances, disclosure and consultation procedures for their preparation;
- Details of consultations with relevant stakeholders during preparation of the SMF;
- Institutional arrangements for the implementation of the SMF;
- Grievance Redress Mechanism (GRM) for the Project describing the institutional arrangements, principles, procedures and timelines;
- Monitoring and evaluation mechanisms including the internal as well as the external monitoring and evaluation, monitoring objectives, indicators, monitoring responsibilities and M&E framework;

- Capacity analysis and proposals for improving and consolidating capacity and skills required for the Project implementation for general due diligence management; and cost and budgets.

1.2.3 SMF Policy Principles

10. SMF policy principles are explained in the **Table 1** to be mainstreamed by the IA in adopting appropriate processes for social impact assessment and mitigation of impacts (Refer **Section 8**).

Table 1: SMF Policy Principles

Principles	Description
Transparency	The World Bank Policy on Access to Information 2010 recognizes that stakeholders can exercise their rights to access information in context of development projects and the IA is obligated to place information in public domain to avoid any trust deficit. Information regarding the sub-projects will be disclosed to the public, where applicable.
Inclusion	Sub-projects will be designed to ensure that vulnerable and marginalized sections of the communities including the very poor from *katchi abadis*, women, transgender persons, disabled persons etc. are able to share the benefits of the sub-projects.
Participation	The citizens need to be empowered with an opportunity to decide, implement and monitor the development sub-projects. Accordingly, the focus will be to promote participatory processes through the sub-project cycle.
Social Accountability	The subprojects will implement social accountability tools to ensure transparency and improve citizen participation, including display of information of all activities and their costs at noticeable public places, participation of citizens in monitoring and evaluation, and the use of simple formats for reporting findings during planning, implementation and post-implementation subproject stages.
Social Safeguards	The overall Project approach will be to avoid or minimize, to the extent feasible, the hardships and impoverishment of communities due to land acquisition and displacement associated with the implementation of sub-projects.

1.2.4 Application of Policy Principles on Social Safeguards

11. The IA will follow SMF policy principles with respect to social safeguard impacts such as involuntary resettlement, health and safety, working conditions, and conservation of cultural heritage. The summary and the list of social safeguards principles to be applied on social safeguards are as follow:

1.2.4.1 Assessment and Management of Social Risks and Impacts

- A consultative and participative process of social screening of the specific subproject areas and activities;
- An orderly and logical step by step process to identity and prevent potential social impacts of the planned subproject activities;
- An assurance to prevent, or if prevention is impossible, to minimize, mitigate, or compensate the negative impacts on the local communities especially women and vulnerable peoples;

- A monitoring and evaluation system to track the implementation of mitigation measures and actions; and
- A budget to ensure that the Project has the necessary resources to achieve the desired objectives, particularly those related to the preparation and implementation of subprojects.

1.2.4.2 Land Acquisition, Restrictions on Land-Use and Involuntary Resettlement

- Avoid the negative impacts or at least minimize the risks of involuntary resettlement;
- Mitigate the social and economic impacts of land acquisition on the affected people by providing compensation for loss of assets at replacement cost; and ensuring that resettlement activities are undertaken properly, through information disclosure, consultation and informed participation of those affected; and
- Improve or at least restore the livelihood and standard of living of the relocated people.

1.2.4.3 Labor and Working Conditions

- A clear strategy to build, improve, and maintain relationships between the contractor's management and the workers;
- A policy of fair treatment without discrimination, equal opportunities for male and female workers, preventing child labor and forced labor in compliance with the national and international laws;
- A gender-sensitive and harassment-free enabling work environment; and
- A Health and Safety Policy to ensure safe and healthy working conditions as well as to protect and promote worker health.

1.2.4.4 Community Health and Safety

- A policy to prevent or minimize the risks and impacts on health, safety and security of workers and the surrounding community; and
- Ensure proper protection of personnel and property so as to prevent or minimize risks to the community's safety and security.

1.2.4.5 Cultural Heritage

- Protect the cultural heritage from negative impacts of project activities and support its preservation; and
- Encourage the project developers to take responsibility towards protecting the cultural heritage around the project area.

1.2.4.6 Information Disclosure and Stakeholder Engagement

- Encourage information transparency and the participation of community and other stakeholders through fair and meaningful consulting efforts; and
- Encourage community participation in sustainable development in the affected area as an effort to facilitate the culture of consensus and democracy in the project and affected communities through an institutionalized grievance redress mechanism.

1.2.5 Methodology for SMF Preparation

12. The SMF has been prepared in accordance with the applicable safeguard policies of the World Bank and the national regulatory requirements. It involved literature reviews; social scan of the proposed Project corridor through field reconnaissance visits, key institutional consultations, focus group discussions with communities including *katchi abadis* and semi-structures interviews with officials of IA, relevant sector institutions, provincial and district officials, civil society organizations and academia. Where statistics fell short, personal anecdotal narratives and specialists' perspective were taken into account to fill the information gaps.

1.2.5.1 Literature Review and Policy Analysis

13. An extensive search and review of secondary literature was undertaken. The review covered census reports, journal articles, research reports, consultancy reports and policy documents regarding social service delivery and infrastructure in Karachi. National and provincial laws and policies that are likely to have an impact on the implementation of the Project were also analyzed. A list of documents that were reviewed during the assignment has been provided in the Bibliography.

1.2.5.2 Social Scan and Field Reconnaissance Visits

14. Social scan and field reconnaissance visits were carried out to check water supply/sources, water pumping stations, sanitation facilities and storm water drainage, including primary and secondary drainage sources of the potential subproject sites. Observations were made and recorded during visits to existing drainage and sewerage lines in different towns of the city. During these visits, existing solid waste management practices were also identified and recorded. The purpose of this activity included collection of first-hand information about the project area, verification of data collected during desk study, assessment of likely impacts and identification of major issues and preparation of methodology for a detailed investigation.

1.2.5.3 Stakeholders Consultation

15. Stakeholder consultations have been carried out with (i) local communities who are likely to be impacted by the subproject interventions and (ii) institutions that have an important role in enabling the realization of the project interventions. In addition, consultative meetings were held with the staff of the IA to discuss issues related to drainage and municipal services from the perspective of a lead agency. Consultation meetings were also held with relevant provincial line departments, civil society organizations and academics.

1.2.5.4 Focus Group Discussions with Communities

16. Focus Group Discussions (FGDs) were undertaken to gain community feedback and insights on service provision with respect to wastewater, drainage, solid waste management and municipal services. Community perceptions and attitudes regarding availability, access, reliability, quality and use of solid waste and sanitation services, costs incurred and willingness to pay for services. The aim was to ascertain their concerns, suggestions and feedback on the proposed Project its anticipated social impacts during implementation.

17. FDGs were carried out with groups of men and women including marginalized and vulnerable segments of the population such as senior citizens, children and female-headed families. The FGDs were conducted in selected poor settlements in 18 localities across six districts of the Karachi Division. Three localities of each district were selected through a

purposive sampling method with support from a local NGO and care was taken to ensure that they represent the overall scenario of the selected towns in terms of socio-cultural and economic conditions as well as ethnicity, the level of occupancy and current level of social infrastructure and services. These FGDs were conducted during the months of October and November, 2018 with support from a male and a female sociologist.

1.2.5.5 Key-informant Interviews with Service Providers

18. Key-informant interviews and discussions were held with relevant IA officials to understand the institutional perspective on the rationale of the proposed World Bank investment and to gain more insight into the ongoing initiatives related to water and sanitation service delivery. This also included discussions with district and ward staff. The purpose of this exercise was to ascertain the perceptions, perspectives, practices and priorities of the service providers of the implementing agency.

1.2.5.6 Impact Assessment

19. During the impact assessment, the socioeconomic data and project information collected in previous steps was used to determine the potential impacts of the indicative subprojects. Subsequent to this, the potential impacts were characterized in order to determine their significance. Mitigation measures were identified where required to minimize the significant social impacts. A management framework was also developed in the form of an SMF for the implementation of the mitigation measures identified during the field study.

20. The following synoptic **Table 2** presents an overview of the key activities that were conducted within each phase. It also lists all the outputs that were produced as well as the key meetings with relevant contracting and executing authorities.

Table 2: Methodology and Approach for the Preparation of SMF

Phases of the SMF Preparation	Key activities	Outputs
Inception Phase	• Initial documentation/data collection and context analysis • Review of Relevant documents • Inception interviews • Stakeholder identification • Methodological design of the SMF Preparation	• Start-up meetings with the WB, LCs to gain a clear and shared understanding of the scope and to clarify expectations regarding SMF outputs, methodology and to obtain additional or latest relevant information. • Identification of key stakeholders • Inception Report
Field Phase	• Gathering of primary evidence with the use of participatory approaches including focused group meetings, interviews, consultations • Stakeholder analysis and mapping • Review of literature/content analysis • Semi-structured interviews with key informants of service providers	• Field visits to proposed subproject sites • Consultation meetings with Government Departments, CSOs and Academia • FGDs with males and females in 18 localities across six districts
Synthesis	• Data collation and analysis	• Draft SMF including RPF

Phases of the SMF Preparation	Key activities	Outputs
Phase	• Final analysis of findings from site visits, consultations, FGDs and KIIs • Analysis of the reliability and coverage of data collection	
Disclosure Phase	• Disclosure of Draft Report with relevant stakeholders through a one-day event in Karachi • Incorporation of feedback in the draft SMF • Submission of Draft Report to WB and IA.	• Delivery and circulation of the Final Draft Report • Draft SMF review meeting with representatives of LGD, LCs
Completion Phase	• Triangulation, correction of factual errors and addressing quality issues • Addressing the relevant comments	• Final SMF Report including annexes

1.2.6 Updating the SMF and operationalization of SMF

21. This SMF is a document that may be updated by the IA from time to time in accordance with the needs, lessons learnt during subproject operations and future circumstances. The updated SMF shall be approved by the World Bank and will be made available to the stakeholders through the IA's website. It includes detailed operational procedures to be followed by IA regarding screening, impact assessment, determination of safeguard instruments and remedial actions, monitoring, supervision, reporting, public consultation and disclosure for subprojects.

2 PROJECT DESCRIPTION

2.1 Project Description

22. The development objective of the proposed Project is to improve urban management, service delivery and the business environment in Karachi. It aims to improve institutional performance and service delivery of Karachi local councils.

2.1.1 Project Components

2.1.1.1 Component 1: Performance-based Grants to Local Councils and Capacity Building (WB financing: USD 160 million)

23. This component will provide annual performance-based grants to Karachi's local councils (LCs), namely KMC, District Council and six DMCs, upon achievement of specified institutional strengthening measures. It will incentivize LCs to improve basic urban management capacity, with LCs using these grants to implement subprojects for provision of infrastructure and services within their mandate. To assist LCs in achieving the institutional strengthening measures, and to manage and implement the performance grants system, this component will also provide centralized capacity building and project implementation and management support through the Local Government Department (LGD) of GoS. The infrastructure and services subprojects to be financed will be selected on the basis of a comprehensive screening and risk reduction procedure. (see Table 2 of RPF for eligible investment.)

24. This sub-component will provide three types of annual grants to participating and eligible LCs as incentives to incrementally improve their urban management and institutional capacity, including one capacity building grant to address basic capacity needs identified by LCs and two capital infrastructure grants as incentive to achieve progressively more advanced institutional capacity measures. Capital infrastructure grants will be introduced in a phased manner, beginning from the second year of the project, once assurance is obtained of certain basic acceptable systems being in place within LCs, including safeguards management and inclusive development. In the first year of the project, only the capacity building grant will be available. LCs will use the capital infrastructure grants to execute infrastructure and services subprojects within their mandate, as per a screening criteria and other procedures described in this document. Selection, design and implementation of all subprojects will comply with this SMF (including Annex A - Resettlement Policy Framework (RPF)).

2.1.1.2 Component 2: Modernizing Urban Property Tax Administration and System (WB financing: USD 40 million)

25. This component will support modernization and improvements to the Urban Immovable Property Tax (UIPT) system in Karachi by financing the following activities: the carrying out of an all-Karachi property survey to update the property tax database ("fiscal cadaster"); development and upgradation of IT systems to house the property tax database / fiscal cadaster information and associated trainings to run and operate these systems; capacity building of all relevant staff; carrying out of taxpayer sensitization and outreach efforts; development of IT systems to facilitate taxpayers, including internet-based information, billing and payments; and reviews of relevant legislation or regulations on all aspects of UIPT, including tax policy and institutional structure for this tax.

2.1.1.3 Component 3: Improvement of City Competitiveness and Business Environment (WB financing: 20 million)

26. This component will support improvements to the business environment in Karachi and build capacity of local-level agencies to crowd-in private investment for the provision of city infrastructure and services through enhanced capacity to develop bankable projects. It will support the recently-established Sindh Investment Department (SID) to improve the business environment for private sector investment by streamlining and integrating key regulatory processes, including through the following: (a) regulatory process mapping and development of a registry of business licenses and permits issued by selected regulatory bodies; (b) development of an online portal and associated facilities to automate and integrate regulatory processes of selected agencies to facilitate businesses; and (c) studies to address constraints to private financing of infrastructure. It will also support LGD for the establishment and operations of a node for the origination of public private partnerships (PPPs). This PPP node at LGD will act as PPP origination arm of all agencies operating under LGD and and will help create an enabling framework for private investment in municipal services and infrastructure.

2.1.1.4 Component 4: Technical assistance for solid waste management (WB financing: USD 10 million)

27. This component will support LGD and the Sindh Solid Waste Management Board (SSWMB) to improve the performance of the SWM sector in Karachi and SSWMB as an institution, through a set of technical assistance activities addressing critical identified challenges, and to contribute to the formulation of a long-term investment strategy. Activities include: (a) TA for policy and regulatory development for SWM sector, including financial sustainability, cost recovery, options for private financing, and management and characterization of waste, including regulations and systems to reduce plastic waste and manage hazardous waste streams; (b) capacity building of SSWMB including trainings, data management and performance monitoring systems, and improving efficiency of SWM; (c) technical, environmental and social baseline studies for existing SWM facilities and infrastructure and options for development of additional facilities, and options to better integrate existing informal sector; and (d) social sustainability, public awareness and behavior change activities focusing on community-level engagement and baseline study for community-level job creation in SWM, including steps for the professionalization of the waste sector.

3 SOCIAL CONTEXT AND BASELINE CONDITIONS

3.1 Context

28. This Section provides preliminary baseline data pertaining to the demographic and socio-economic conditions of Karachi with the objective of setting the context for the proposed subprojects to be implemented under CLICK. This Section builds primarily on secondary resources from published literature, Focus Group Discussions with communities in formal and informal settlements (*katchi abadis*), consultations with key institutional stakeholders and on-site observations of the potential sub-project localities.

3.2 Socio-Economic Features

29. Karachi is the capital of the province of Sindh, and the largest city in Pakistan. The area, once inhabited by small fishing communities, has now transformed into a dynamic, thriving and multifaceted megacity spreading over 3,530 square kilometers.[4] Since 1947, due to multiple pull factors, the city has witnessed an influx of economic and political migrants, and refugees with different national, provincial, linguistic and religious origins — many of whom have come to settle permanently. Thus, Karachi became one of the fastest growing cities in the world.[5] Rapid un-regulated urbanization has led to growth of different types of settlements, each having its unique contextual features with regards to occupational patterns, living standards and access to basic services.

3.2.1 Demographic Characteristics

30. Karachi is the largest and most populous city in Pakistan, and the 7th largest metropolitan city in the world.[6] According to the provisional results of the 2017 population census, the urban population of Karachi Division was estimated at 14.9 million, growing at a rate of about 2.49 percent per year.[7]

Table 3: Urban and Rural Population Distribution in Karachi and the Annual Inter-censal Growth Rates: 1998-2017[8]

Karachi Division	Population (Million)		% Population in Urban/Rural Areas		Annual Growth Rate (%)	Sex Ratio 2017
	1998	2017	1998	2017	1998-2107	110.9
Urban	9.45	14.91	95.9	92.9	2.43	110.7
Rural	0.41	1.14	4.1	7.1	5.56	113.5

Source: District Wise Population by Sex and Rural/Urban, Census - 2017 Sindh, Pakistan Bureau of Statistics.

31. Karachi's urban population increased from 9.45 million to 14.91 million. A total of 5.46 million persons were added in the city population during the past 19 years. According to the

[4] http://www.kmc.gos.pk/
[5] http://worldpopulationreview.com/world-cities/karachi-population/
[6] ibid
[7] It is important to note that gap of 17 years between the 1998 and 2017 census and the controversy on city population in the current census, it was not possible to collate comprehensive and latest data on socio-economic baseline
[8] http://www.spdc.org.pk/Data/Publication/PDF/SPDC%20CENSUS%20REPORT-Final-%2027th%20Aug%202018.pdf

1998 Census the population of Karachi consisted of approximately 54% males and 46% females. In the same period, the national population was 130.5 million, and that of the Sindh province 30.4 million. Growth rates since 1981 were 2.61% and 2.80% respectively, indicating rapid urbanization in Karachi, which was also much higher than the national average growth for urban areas of 3.45% and also for that of Sindh at 3.52%. Of the 9.2 million which 8.74 million were living in the Metropolitan Corporation (MC) area covering Municipal Districts (MD), and 0.46 million in cantonment area.[9]

32. Karachi population estimates have always been questionable and marred with controversies. The validity of the 2017 census has been questioned by various demographers who have authored research articles in this field.[10] Various population projection estimates are available in the literature which question the officially sponsored census records – some of which are summarized below:

- Karachi reports the lowest intercensal growth rate in Sindh but an annual growth rate which is higher than the provincial average. In addition, Karachi reports the highest sex ratio among the four provincial capitals. Perhaps due to this discrepancy, undercounting of Karachi's population, the validity of the 2017 census has been questioned.[11]
- According to the Karachi Master Plan 2020, the population of the city is expected to reach 27.6 million by 2020, almost twice that of 2005. The number of households is expected to increase from 2.2 million in 2005 to 3.9 million in 2020.[12]
- Projected UN population estimate for Karachi in 2016, based on the total population of Karachi at the time of the 1998 census (around 9.8 million), was 17.1 Million with 3.3 percent annual growth.[13] This exponential increase in human numbers is almost doubled in two decades.
- According to another estimate, Karachi is the greatest urban center of Pakistan and the second largest Muslim city in the world.[14] The population of the metropolitan city would reach around 24 million in 2020.[15]

33. To reckon the above explanations and estimates of the population projected at the inter-censal (1981-1998) growth rate of 4.5%, the projected population of Karachi in 2015 would roughly had reach 20.7 million and 26.4 million in 2020. However, it is likely, as experienced in other large cities worldwide, that growth is likely to have gone down especially where quality of life, law and order and decline of social services due to inordinate growth of the city.

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[9] Final Report for Karachi Megacity Preparation Project, https://www.adb.org/sites/default/files/project-document/69115/38405-pak-dpta.pdf

[10] Karim, Mehtab S. 2017. "Census Contradictions." Narratives. December; Zaman,2017; Karim 2017

[11] Population & Housing Census-2017 - Social Policy and Development, *www.spdc.org.pk/.../SPDC%20CENSUS%20REPORT-Final-%2027th%20Aug%2020..*

[12] Karachi Master Plan 2020, 2007

[13] The World's Cities in 2016, available on http://www.un.org/en/development/desa/population/publications/pdf/urbanization/the_worlds_cities_in_2016_data_booklet.pdf

[14] Cox, 2014)

[15] Paracha, 2014

34. Geographically speaking, Karachi is located strategically on the coast of the Arabian Sea, north-west of the Indus River Delta and the city is growing both laterally and vertically. Under the circumstances, considerable horizontal expansion is taking place. As the City is bounded on the south by the sea and to the west by Hub River and Balochistan, the urban sprawl is more towards the east and north.

35. The expansion to the east is more rapid. The factors that contribute towards making the eastward direction preferable for expansion include a suitable flat terrain and its connectivity through two major roads in the east, the National Highway (N-5) and the Super Highway (M-9). Additionally, due to the proximity to industrial zones such as Korangi, Landhi, Port Qasim and Gharo located further east of Port Qasim at both sides of N-5 also witness rapid population growth and expansion.

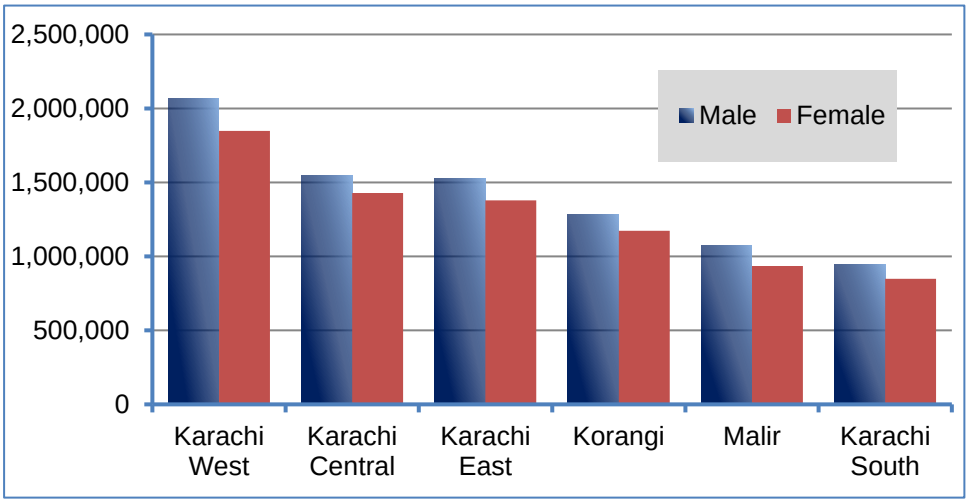
3.2.2 Population Distribution

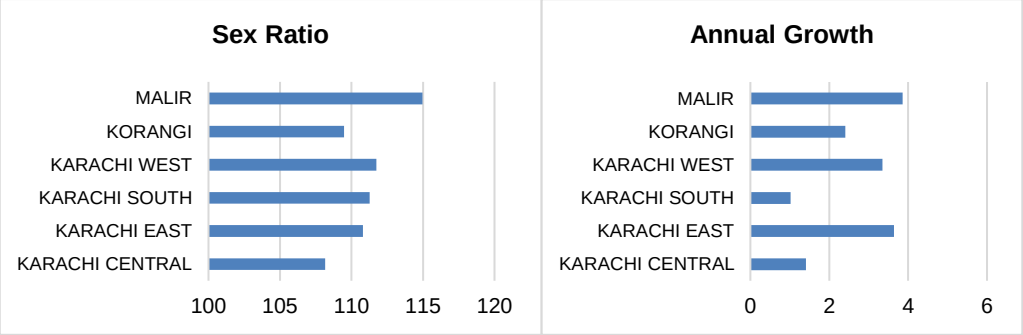
36. The City is comprised of six urban districts with unevenly distributed population where the potential subprojects of the proposed CLICK will be identified, planned, constructed and operated. Population distribution across its 6 districts (Census, 2017), shown in the graph below, indicates much lower populations in Malir and Karachi South as compared to other districts. On the other hand, Karachi West and Central have the highest residential population densities — some parts of the districts comprise of congested residential apartments which are extremely difficult to access.

37. Looking at the age composition from the 1998 Census, out of the total population 37.6% is under 15 years of age and 58% of the population between 15 to 50 years of age. These numbers point out to the fact that Karachi is a young city, which implies substantial future needs relating to municipal services, water supply & sanitation, housing, education, health, employment, and transportation etc. that the city has to address.

38. Karachi Division has six districts and of these, East, West and Malir (which also contain rural areas) report substantially higher annual growth rates. It is evident from high sex ratios in these districts, that there has been substantial in-migration to these districts. On the other hand, Central and South districts of Karachi report lowest annual growth rates, which could be due to, either substantial decline in fertility rate in these district or out-migration.

Figure 1: Population Distribution, Sex Ratio and Annual Growth across Districts





3.2.3 Population Trends

39. The overall trend of urbanization has been rapidly increasing in Pakistan since the 1970s, with the majority of the population shifting to the urban centers of the country from the rural regions, in order to seek better employment opportunities and social services[16].

Table 4: Population Growth of Karachi

Year	POPULATION (000)	Increase Over Previous Census/ Survey	No. of Years Between Surveys	Increase/ Decrease (%)	Average Annual Growth Rate (%)
1941	387		10		3.70
1951	1068	701,780	10	158.7	11.50
1961	1913	906,377	10	80.5	6.05
1972	3515	1,562,702	11	76.50	5.00
1981	5208	1,831,238	9	50.8	4.96
1998	9339	4,540,422	17	86.29	3.52
2017	14910	5,108,218	19	34.26	2.49

Source: Census Reports, Government of Pakistan

40. **Table 4** shows that the population of Karachi has been growing consistently at much higher rate during all the decades from 1941 to 1981. The population of Pakistan increased by 7.9 per cent and 23.7 per cent during the decades of 1941-1951 and 1951-1961, respectively, whereas the population of Karachi grew by 158.4 per cent and 80.5 per cent respectively.

[16] Sharif & Raza, 2016

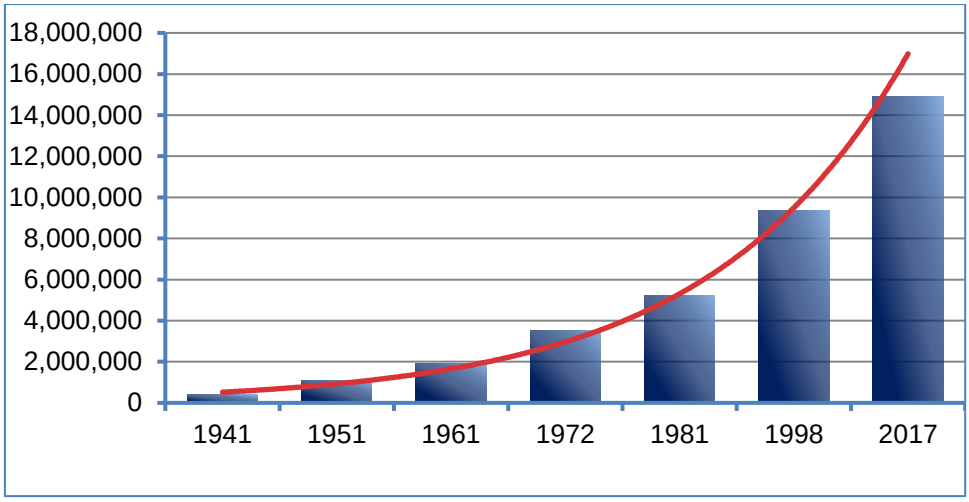


Figure 2: Population of Karachi - Intercensal Annual Growth Rates (1941 – 2017)

41. In between 1951 to 1972, Karachi's population increased approximately 200% to 3.6 million. It grew a further 106.38% by 1987 to 7.4 million, and currently an estimated 350,000 more migrants are added every year.[17] Various unofficial estimates place Karachi's present day population between 14 to 15 million inhabitants. To quote one estimate "the population of the city is growing at 5% annually" mainly due to migration, a massive increase by any standards that increasingly puts immense pressure on resources.[18] According to a UNDP report on Karachi, "Rapid population growth has pressured the urban infrastructure to a breaking point, and abject poverty in the extensive *Katchi Abadis*, or squatter settlements".[19]

42. Between 1951 and 2017, Karachi has grown over thirteen-folds, slightly higher than the overall urban growth in Pakistan. Thus, Karachi's share in Pakistan's urban population increased from 18 percent in 1951 to 21 percent in 1998. However, due to reported decline in Karachi's growth rate during the past 19 years, its share has declined to below 20 percent in 2017. According to the 1998 Census Report, Karachi had a population of 9.2 million in 1998 compared with 5.2 million in 1981, a growth rate of 4.5% per annum, of which 9.4m of them lived within 603 square kilometers of 'urban area' out of a total area of 3,557 sq.km. The population density of about 58 persons per sq. km is relatively high as compared to other cities in Pakistan. The city is spread over an area of approximately 3,530 square kilometers.

3.3 Ethnic, Religious and Linguistic Diversity

43. Ethnic identity has played an important role in shaping Karachi's geography and social fabric. It has also dominated political and economic activities as various ethnic groups compete for resources and power, with strong implications on social development and municipal service delivery.

44. Karachi's population is a diverse mix of various ethnic groups. According to the 1998 Census, *Mohajirs* comprised of almost 48.5 percent of the population of Karachi, followed by Punjabis (14 percent), Pakhtuns (11.42 percent), Sindhis (7.22 percent) and Baloch (4.34 percent).[20] It may be mentioned here that most of the Baloch in Karachi are third generation

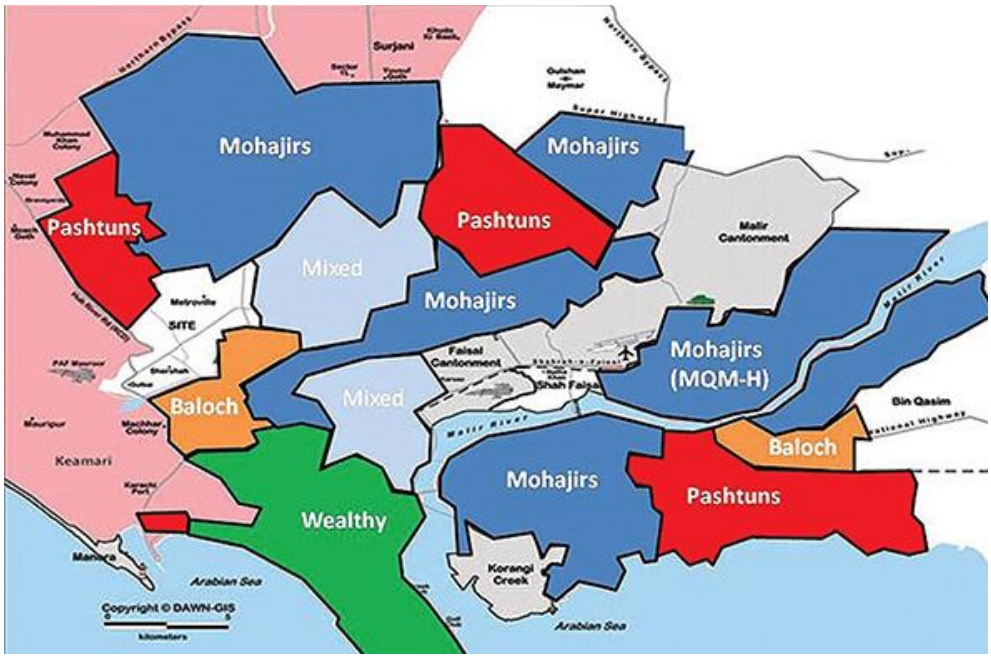
[17] Hasan Arif, "Understanding Karachi, Planning and Reform for the Future", City Press, Karachi, 1999

[18] https://www.cs.mcgill.ca/~rwest/wikispeedia/wpcd/wp/k/Karachi.htm

[19] Roman Pryjomko

[20] Census, 1998

migrants and politically identify themselves with Sindhis. **Figure 3** shows a rough sketch of the ethnic configuration within the city districts.



Source: The Weekender[21]

Figure 3: Ethnic Composition and Diversity in Karachi Districts

45. Others, comprising foreigners and illegal immigrants, constitute two percent of the population. Majority of *Mohajirs* live in planned areas, while over half of Punjabis, over two-thirds of Pashtun and Sindhis, and three-fourths of Balochis live in *katchi-abadis*.[22]

46. Although ethnicity is a complex socio-cultural construct, in Karachi's context it has often been compounded with linguistic overlay for attaining self-identification. The Partition of India in 1947 is seen as a key turning point with the arrival of migrants (or *Mohajirs*) and their subsequent evolving into a somewhat coherent Urdu-speaking community. Earlier migrants such as Sindhis, Baloch and Kachhis often see themselves as original inhabitants of Karachi. Post-partition migration from Punjab and Pashtun regions of Pakistan led to further diversity in the city's ethnic demography.

47. In addition, continuous migration from rural to urban areas and from other provinces to Sindh, particularly to Karachi, has been quite prominent as was indicated in the censuses conducted during 1951 to 1981, which was the major reason for the increase in Sindh's share in the country's population. This trend of migration continued in the 1990s and afterwards as well.

48. Furthermore, the enactment of the Sindh Katchi Abadis Act of 1987 and the subsequent establishment of the Sindh Katchi Abadi Authority (SKAA) to carry out the process

[21] www.theweekender.com.pk

[22] Anatomy of Ethnic Militancy: Case of Karachi, Pakistan Kaiser Bengali and Mahpara Sadaqat Working Paper Series # 71, 2002, SDPI

of providing leasehold (99 years), infrastructure and basic services to the inhabitants, have proven to be strong pull factors which have further enriched the city's ethnic diversity.

3.4 Influx of Immigrants

49. Karachi has seen an influx of immigrants, which has not only changed its demographics considerably but has also significantly altered the balance of power between various ethnic groups. This has resulted in a host of issues, particularly an incremental pressure on the delivery of social services. Karachi is not only Pakistan's largest city but also one the most demographically diverse-unplanned migration over the past many decades being a major factor. The city is divided into planned and unplanned settlements. The migration towards Karachi can be identified in five phases.

50. The first phase was seen after partition when large number of refugees (Urdu-speaking Mohajirs) migrated from Northern India to Karachi during following the Partition of India in 1947. This major demographic shift reshaped the political landscape as Mohajirs gained greater influence and power. This created resentment among the original Sindhi and Baloch residents of the city – igniting the igniting the first sparks of social unrest in the city.[23]

51. The second phase of migration started in the 1960s, when large number of Pukhtuns from North Western areas of Pakistan migrated to Karachi for better employment opportunities. In 1998, census results revealed that Pakhtuns formed 11.42% of Karachi's population (based on spoken language). In terms of occupation, most of these Pakhtuns migrants were associated with public transport, trucking and informal recycling sectors. By 1980s, the Pukhtun population were established in and controlling considerable squatter settlements.[24]

52. During the third phase which started in the 1970s and lasted through the 1990s, Karachi experienced a large influx of people from rural Sindh who had migrated in search of better employment and economic opportunities.

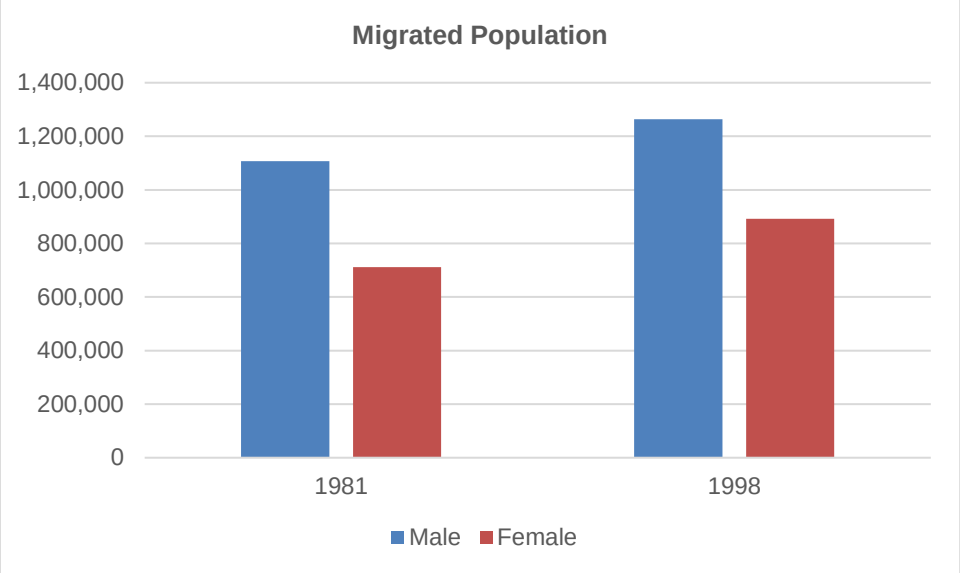
53. The fourth phase (1980s - 1990s) was triggered by the Soviet invasion of Afghanistan and the Islamic Revolution in Iran which brought scores of Afghan and Iranian refugees to Pakistan, many of which settled in Karachi,

54. The fifth phase was triggered by the - US invasion of Afghanistan and the post-2004 military operations in North Western Pakistan which resulted in a mass-migration of a large number of internally displaced persons (IDPs) from FATA and Khyber Pakhtunkhwa. The growth in economic opportunities in Karachi due to the opening of NATO supply lines also attracted a large number of migrants from across the country.

55. As mentioned before, the 1947 Partition of India dramatically changed the demographics of the city and many experts are of the view that this lies at the root of Karachi's current social unrest. Later arrival of migrants, mainly from KPK, has added another dimension to the ethnic complexity and social inequities in terms of social service delivery. In 2001, the total migrant population was estimated at about 22 percent of the total population of Karachi. In the 1998 census results, the sex composition of Karachi's migrant population

[23] Urban Slums Report: The Case of Karachi, Pakistan.
Arif Hasan and Masooma Mohib, 2001
[24] 1998 Census

shows a significant difference between the number of males and females as shown in **Figure 4**.



Source: Urban Slums Report: The Case of Karachi, Pakistan.
Arif Hasan and Masooma Mohib, 2001

Figure 4: Migrant Population

56. Karachi's growth is both natural and due to extensive into the city migration every year. The population of Karachi increased manifold after independence. It was estimated that around 600,000 people migrated from India to Karachi. The 1961 Census revealed that during the ten years post-independence, Karachi's population increased by 79% at an average annual growth rate of 6.05%.[25] The annual growth rate accounts for not only the natural growth in city's population but also the influx of migrants from India and rural areas of Pakistan. Most of these migrants settled in squatter settlements at the city's periphery while others settled in open areas within the city. Federal Government offices and foreign embassies were also established in that era, making the city a dense, multi-cultural, multi-linguistic and multi-religious city.

57. Accommodating such a large population proved to be quite challenging as it required extraordinary planning and management.

3.5 Incidence of Poverty in Karachi

58. Urban poverty has many different dimensions, ranging from material well-being (including basic needs like nutrition, healthcare facilities, shelter, education etc.) to lack of human rights, citizenship or social networks. Economic factors such as low income, lack of assets, access to markets or public services can lead into poverty. Poverty is also defined by indicators like inability to afford adequate housing, tenure insecurity due to fear of eviction and depletion of savings invested in housing, unhygienic living conditions, low-quality public services, poor health and education, and lack of employment or inability to have regular income translating into social insecurity.[26]

[25] Census 1961
[26] http://povlibrary.worldbank.org/files/4418_chap16.pdf

59. Karachi ranks third among the least poor districts of Pakistan. [27] The metropolis, with an approximate population of 20 million, has a poverty ratio of 4.5% on the Multidimensional Poverty Index (MPI)[28].

60. In Karachi, the poverty ratio was 4.5% in 2014-15, 6.7% in 2012-13, 9.9% in 2010-11 and 10.5% in 2008-09. Karachi witnessed a significant poverty reduction in the 10 years up to 2015, with 9 percent of the city's population living in poverty in 2014–15 compared to 23 percent in 2004–05. This makes Karachi City, the least poor district in Sindh province and third least poor in Pakistan.[29]

61. Despite this, there are pockets of high poverty and great variations in wealth within Karachi, due to its geographical expanse and large population size. The incidence of poverty varies in the 18 towns and the cantonment areas within the metropolis. The incidence of poverty is lowest in the cantonment areas. The highest incidence of poverty reported is in the working class and Katchi Abadi-dominated towns such as Orangi, Gadap and Landhi.

62. In *Katchi Abadis*, poverty is a multi-dimensional phenomenon. Some of the many facets of poverty include: inadequate and unstable income leading to inadequate consumption and indebtedness; poor quality and overcrowded housing; poor and risky asset base; unplanned and illegal occupation with high risk of evacuation or demolition; inadequate access to public services and infrastructure (piped water, sanitation, electricity), schools, vocational training, health care, public transport, communication and law enforcement; no safety net to ensure basic consumption, housing and health care, protection of the civil and political rights of the poor[30].

63. According to one estimate, there are 600 slums in Karachi and 50 percent of Karachi population live in informal settlements of various types.[31] A study of availability of social services in these urban slums in Karachi City showed that 55 per cent of slums did not have health facilities. While 10 per cent of Expanded Program for Immunization (EPI) services are provided through fixed sites, 48 per cent through outreach and 19 per cent through lady health workers, a total of 23 per cent of slums did not have EPI services. Private curative healthcare services were available only in 43 per cent of the slums[32].

64. Opting to live in a *Katchi Abadi* is itself an important indicator of poverty: life entails living with poor infrastructure services, and under the stress and constant threat of eviction. Over 40,000 people have already been evicted during the last 10 years. The government on the one hand is unable to provide proper shelter to the poor and on the other occasionally resorts to evictions and demolition for expansion of necessary city infrastructure. The fear of

27 Compiled with the help of Oxford Poverty and Human Development Initiative (OPHI) and United Nations Development Programme (UNDP), the report was recently released by the Planning Commission of Pakistan

28 MPI is based on the Alkire Foster methodology that covers three dimensions – education, health and living standards — as a yardstick to measure poverty instead of the traditional methods of relying on income or consumption as a base.

[29] Federal Bureau of Statistics through PSLM survey, 2017

30 Mahbub ul Haq Human Development Centre. 2014. "The Rise of Karachi as a Mega-City: Issues and Challenges." Policy Brief. Islamabad.

31 Karachi's unplanned areas can be divided into three main categories: (i) katchi abadis that have been regularized or are awaiting regularization; (ii) slums, which are very dense inner-city areas with deficient infrastructure; and (iii) hinterland, or *goths*, which have become part of the urban sprawl.

32 UNICEF Annual Report 2017, Pakistan

evictions leads the poor to develop community/ethnic based settlements as well as protection networks/organizations.

65. Over the years, around 30 per cent of these settlements have been regularized and upgraded with the provision of roads, water and sanitation services. There is still a large gap in regularization and up-gradation. The regularization and up-gradation of *Katchi Abadis* will provide secure shelter, relief from living under stress and an enhancement in asset base to the majority of the poor in Karachi. The poor living in the *Katchi Abadis* are voiceless and powerless within the political system, lack access to decision-making institutions, and lack the means and capability to demand greater accountability from public agencies.

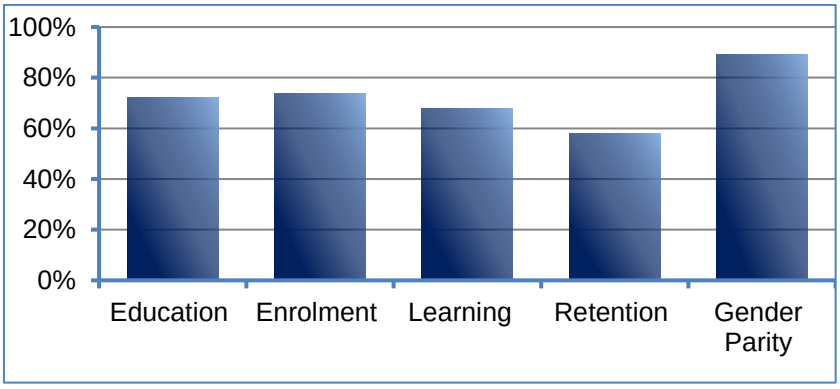
3.6 Social and Human Development Indicators of Poverty

66. As proven worldwide, improved access to social services and other safety nets reduces household expenditure and poverty levels. Better literacy, nutrition and health can drive a dynamic workforce and the development of these social indicators will lead to higher productivity and thus will contribute to stronger economic performance, (i.e., improved per-capita incomes).

3.6.1 Education and Literacy

67. According to UNDP, Pakistan has low gender development index (GDI) of 0.742 (2016) and low gender inequality index (GII)[33] of 0.546. However, over the years, Karachi has witnessed an increase in literacy; the narrowing of the male-female literacy gap; an increase in the age at which people get married (especially women); an increase in divorce rates; a reduction in the number of married people; and a trend towards the formation of nuclear families as opposed to extended ones.

68. Karachi's literacy rate was 87 percent in 2017 while it stands at the 59th rank nationally in terms of school infrastructure and availability of facilities.[34] Karachi stands 43rd in national and first ranking in district education in 2016. In 2016, Karachi had an Enrollment Score of 73.70, Learning Score of 67.90, Retention Score of 58.00 and Gender Score of 89.13 as the following graph (**Figure 5**) illustrates.[35]



[33] GII reflects gender-based inequalities in three dimensions – reproductive health, empowerment, and economic activity. Empowerment is measured by the share of parliamentary seats held by women and attainment in secondary and higher education by each gender

[34] Federal Bureau of Statistics through PSLM survey, 2017

[35] SDPI, Pakistan District Education Ranking, 2016

Figure 5: Literacy and Education Ranking | Karachi, 2016

69. Education is one of the most important factors that distinguish the poor from the non-poor. It is a vital prerequisite for combating poverty, empowering women, protecting children from hazardous and exploitative labor, protecting the environment and influencing population growth. However, literacy rate in *Katchi Abadis* exhibits a dismal picture. Overall literacy rate in Katchi Abadis is 71 per cent with a significant gender gap with 76 per cent for males and 66 per cent for females. The adult literacy rate in *Katchi Abadis* is low at 45 per cent, and ranges from 30 to 48 per cent in different areas with a primary enrollment rate at 54 per cent.[36]

3.6.2 Karachi Human Development Index (HDI)

70. Pakistan has experienced a marginal increase in the value of HDI from 0.560 last year to 0.562 in 2017. Within the country, Karachi falls in high HDI[37] and is fourth in the national HDI ranking[38] in terms of human life – education, health, and standard of living. The graph below (fig. 6) shows incremental improvements in Karachi's HDI from 2005 to 2013. However, 2015 shows a downward trend mainly due to political confrontation between two major parties resulting in change in development priorities. **Figure 6** provides HDI trend from year 2005 to 2015.

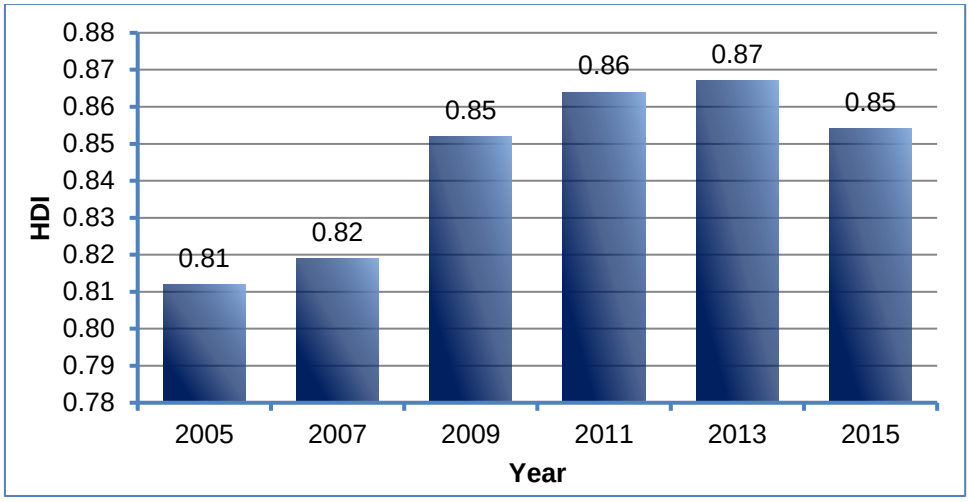


Figure 6: Karachi Human Development Index (HDI)

3.6.3 Health

71. Information on the health characteristics of a population is crucial to a proper understanding and interpretation of the health status of the people, their potential health problems, and the resources for providing services. However, current statistics were not available.

[36] SDPI, Pakistan District Education Ranking, 2016

[37] Pakistan Human Development Index Report 2017, UNDP, available at http://www.pk.undp.org/content/dam/pakistan/docs/HDR/HDI%20Report_2017.pdf

[38] HDI classifications are based on HDI fixed cut-off points. The cut-off points and HDI classification are as follows: less than and equal to 0.299 for very low human development; 0.300-0.499 for low human development; 0.500-0.599 for low medium human development; 0.600-0.699 for medium human development; 0.700-0.799 for high medium human development; and 0.800 or greater for high human development

3.6.3.1 Infant and Maternal Mortality

72. The presence of private sector health facilities has helped in improving health related incidences of poverty. The current infant mortality rate under 5 years [per 1000 live births] has improved to 59 and the maternal mortality to 180. These positive changes reflect increasing levels of awareness, education and the availability of decentralized governance of Sindh *Katchi Abadis*. An increasing number of young people in Karachi are benefiting from preventive health facilities and the adoption of family planning practices.[39]

3.6.3.2 Disability in Urban Sindh

73. During the year 2017-18, 3,232 men and 5,680 women at the age of 15 or above were reported to have disabilities – almost twice the number in rural Sindh. [40] The disability statistics are based on the framework of WHO's International Classification which take into account six core functional domains, namely, seeing, hearing, communication, cognition, walking, and self-care.[41]

3.6.3.3 HIV

74. Karachi is among the top cities in the world which have recorded an 'alarming' increase in HIV prevalence, according to a senior official of the Joint United Nations Program on HIV/AIDS (UNAIDS). In 2017, the Sindh Aids Control Program (SACP) reported 11,464 HIV patients who were undergoing treatment in Karachi out of which 11,225 were HIV positive patients while the remaining 239 were full-blown AIDS cases.

3.6.3.4 Occupational Safety and Health Situation in Urban Sindh

75. The overall incidence of occupational injuries/diseases in the province indicates that approximately 5 percent of all employed work force (10 years & above) had suffered from an occupational injury/disease during 2014-15. The gender segregation shows that the incidence of occupational injury/ disease was higher among male workers compared to their female counterparts (5.24 percent vs. 3.02 percent respectively).[42]

3.6.4 Housing

76. The poverty dimension in Karachi is further exacerbated due to the lack of housing facilities leading to the constant fear of eviction from illegal settlements and extortion by middlemen, police and various officials for the provision of various services and permission to live in the illegal settlements. Housing is one of the most pressing issues in Karachi. Given the continuous increase in the population of Karachi and the backlog in housing demand that exists, the housing needs of the city are estimated at approximately 80,000 units per year.[43] There exists, however, a huge demand and supply gap in this sector. The shortfall in the supply of housing facilities is most severely experienced by the poor segments of the society due to severe lack of low-income housing provided by the public sector. Since partition, and

[39] Sindh District –Based Multiple Indicators Cluster Survey (MISC) 2003-4, Planning & Development Department, GoS, Karachi, Nov. 2004

[40] The Pakistan Demographic and Household Survey, 2017-18

[41] Person who have difficulty in functioning according to domain, by the highest degree of difficulty in at least one domain, and percentage with a lot of difficulty or cannot do at all in more than one domain, according to background characteristics, Pakistan DHS 2017-18

[42] PBS, Pakistan Labour Force Survey 2014-15

[43] One sector requiring major planning and investment by the public sector, and offering economic opportunities to the private sector. The city government should seriously think about regularizing/legalizing the involvement of a large number of informal developers prolific in the city's low income and poor settlements.

due to a number of migrations into Karachi, this need for housing demand by poor and low-income inhabitants has been met by the sprawl of *Katchi Abadis*.

77. Housing needs in such settlements is met largely by informal developers with no government support whereby majority of the basic services like water, sanitation, education and health are developed with the investment of the inhabitants and the involvement of the informal sector and NGOs. Housing needs of approximately 50% of Karachi's population requiring low-income housing has are met via densification of existing *Katchi Abadis* and slums, vertical growth of existing settlements and horizontal growth on vacant land and encroachment on natural drains.

78. Comparison of housing data from 1980 and 1998 reveals that the total stock of one-room houses fell from 44.94% to 30.09% and the total stock of three-room houses increased from 13.96% to 21.12%; the number of houses with electric connections increased from 65.78% to 93.79%; the number of houses with piped water connections increased from 44.45% to 74.38%; and the percentage of houses with reinforced concrete roofs increased form 42.5% to 56.04%.[44]

79. These large sections of the city's population living in unplanned settlements have minimal or no access to basic services. Karachi's high intensity construction and densely built areas add to the immense pressure on the city's water, sanitation, sewerage and solid waste management services.

80. The current housing demand in Karachi is estimated at 80,000 new units per year. "The formal sector supplies 32,000 housing units and another 32,000 are built in *katchi abadis*. Meanwhile, 75.5pc of the city's residents are classified as poor, and as such they constitute the majority of the unmet demand. The result has been the continuous demand for *katchi abadis*.[45]

3.7 Economy

81. Karachi is the financial capital of Pakistan, and contributes towards a substantial percentage of the national GDP and revenue. Karachi's economy has grown steadily in the past 18 years and per capita income has remained the highest in the country. Depending on the methodology used, Karachi's contribution to gross domestic product (GDP) is estimated to range from 11 to 20 percent. According to various estimates, Karachi generates approximately 65% of the total national revenue (federal and provincial taxes, customs and surcharges). At the Sindh provincial level, the city's share of the provincial tax receipts is as high as 70%.

82. Karachi is home to Pakistan's premier port which handles almost 95% of all foreign trade - in 2001 alone the Karachi Port handled more than 29 million tons of cargo. The city produces 30% of manufactured goods and about 42% percent of value added products in large scale manufacturing. The per capita income of the city is also estimated to be four to five times higher than the national average. Nevertheless, the city has a large population, around 50% of which lives in *Katchi Abadis* and slums.

83. Karachi is home to diverse economic sectors including cement production, corn mills, ship building, steel, textiles, chemicals, pharmaceuticals, automobiles, refined oil, shoes,

[44] Arif Hasan and Masooma Mohib, 2001
[45] Arsam Saleem, 'Evictions, dispossessions and urban sprawl in Karachi, Karachi Urban Lab, 2018.

machines and food production, wholesale and retail. Recent additions to the economic activity are in sectors such as telecommunication, electronic media, software outsourcing, call centers, medical services, and accounting.

84. Growth in the real estate and construction sector has fluctuated in response to speculative activities, fueled in part by cash inflows from outside the city and the country. However, the competitiveness of Karachi's traditional sectors of manufacturing and trade is declining, especially relative to other cities. The decline in the formal manufacturing sector has been accompanied by increased access to less expensive imported goods, especially from China.[46]

85. Furthermore, being the financial hub of the country, Karachi hosts the head offices of the majority of Pakistan's public and private banks. Karachi is also home to Pakistan's largest stock exchange, the Karachi Stock Exchange (KSC) 100 Index, which has been contributing significantly to GDP growth, and handles nearly all of the transactions in government securities and in the shares of most of the important industrial and financial institutions.

3.7.1 Employment

86. Underemployment and unemployment constitute a fundamental set of economic challenges that Karachi faces. Despite that, Karachi has emerged as a major trading, commercial, banking, insurance, retail, financial and economic hub of Pakistan; a growth that has attracted a vast number of migrants over the years. The City is the heart of manufacturing employment in the country[47]. Karachi has a high concentration of industrial activity and is home to the Sindh Industrial & Trading Estate (SITE), Korangi Industrial & Trade Estate, North Karachi Industrial & Trade Estate, etc. According to one study conducted in 1997, Karachi's large-scale industrial sector employed 71.6% of the total employed labor force in Sindh, and out of the total number of large-scale units in Sindh, 72.7% were located in Karachi producing 74.8% of the total large-scale output of the province. [48] According to the 1998 census, employment has fallen from 33.43% in 1981 to 27.58%, with the worst affected being the population above 60 years of age.

Table 5: Labor Force Participation (1981-98)

Employment	**1981**		**1998**	
Male	1,235,104	95.06	1,920,895	94.33
Female	64,126	64.94	115,406	5.67
Total	**1,299,230**	**33.43**	**2,036,301**	**27.58**
Pop. 10 and above	3,886,152		7,384,156	

Source: Arif Hasan and Masooma Mohib, 2001

87. The pattern and nature of employment can be judged from one sample study that was conducted in 2005 and consisted of 5,000 households in 18 towns of Karachi Division, which

[46] Sayeed, Asad, Khurram Husain, and Syed Salim Raza. 2016. Informality in Karachi's Land, Manufacturing, and Transport Sectors: Implications for Stability, Washington, DC: US, Institute of Peace Press.

[47] Transforming Karachi into a Liveable and Competitive Megacity, World Bank

[48] Khuhro, Hamida & Mooraj, Anwer (1997) Karachi, Mega City of Our Times, OUP, Karachi

shows that out of the total population, 81% is employed, out of which 50% are self-employed, 31% are employed by the private sector, 3% by the semi-private sector and 16% by the public sector. Out of the self-employed, 32% are shopkeepers and 12% are laborers. However, out of the total population, a large proportion of the city population, i.e., 75% is employed by the informal sector comprising of small scale or cottage industry, trade and provision of services including water, waste disposal, health, education and housing.[49]

88. The growth in the service sector has attracted many people to new jobs in the city; however, the existing infrastructure has been unable to cope with the growth. As a result, the poorer populations, though an integral part of the growing service sector, have been pushed out into relocation colonies far from the city center to make way for new development in line with the economic growth of the city. The distance of these relocation colonies from the city often results in a total disconnection from livelihoods and limited access to basic services — further deepening the cycle of poverty.

3.7.2 Informal Sector

89. The informal labor market is characterized by a lack of regulation, a lack of security in conditions of employment and an ease of entry. It includes small, unregulated enterprises, often family-managed or self-employed enterprises that use traditional technology and labor-intensive methods.

90. While there is no comprehensive data available on the informal economy, according to some estimates, 75 per cent of those employed in the city of Karachi work in the informal sector. At present the informal sector activities are primarily based in and out of *katchi abadis* and are diverse in scope and nature — comprising of small scale or cottage industry, trade, and provision of services like water, waste disposal, health, education and housing. These activities thus provide a large number of families in Karachi with employment and a means of livelihood. Unfortunately, the fact that such economic activity is in the informal domain means that job security, sufficient wages or adequate health and safety safeguards are rare.

3.8 Social Infrastructure and Services

91. Karachi's economy and population continues to expand rapidly, but investment in urban infrastructure and services has not kept pace with this growth. Inadequate and unreliable infrastructure and services increase business and household costs, harm the urban and natural environment, and compromise the city's regional and global competitiveness.

3.8.1 Water Supply

92. As one of Pakistan's fastest growing metropolises, Karachi is challenged by increasing demand for water and sanitation services. *Katchi Abadis* in particular, face major challenges in service delivery. Unlike other major urban centers in Pakistan which are either located along fresh water bodies or depend on groundwater sources, Karachi receives its supply of water from distant sources.

93. The three main sources of the city's water supply are: i) Hub dam and Lake Haleji which is fed by the Indus River; ii) wells that have been sunk in the dry bed of the Malir River; and iii) Lake Kalri which is miles away and is also fed by the Indus River. Although the city's

[49] ECIL, 2005

mains pipelines carry water for many miles, almost all of the *Katchi Abadis* and some of the formal settlements still face an acute water shortage.

94. This demand is inadequately met by a water supply of 360 to 530 MGD[50] which is filtered at various water filtration plants including COD, Pipri, NEK, Hub and Gharo through an extensive generation, filtration, pumping/boosting and piping system. Against a demand of about 1080 MGD which is estimated for a population of about 20 million people, the KW&SB has the capacity of supplying approximately 640 MGD, out of which 20-40% is lost during transmission due to pilferage and leakages in the aging and dilapidated service delivery system. According to one study, if 40% of the leakages in the transmission routes could be plugged, water supply could be increased by approximately 81 MGD. The shortage is due to many reasons, such as insufficient supply from the two main sources (Indus & Hub Rivers), low levels of ground water, and inadequate and aging water transmission and storage facilities.[51]

95. GoS is also executing number of development schemes in the areas of DC, out of which the most prominent one is K-IV bulk water supply scheme. District Council (DC) is operating 232 water supply schemes in its jurisdiction, out of which 90 schemes draws water from KW&SB's main line and 142 schemes are based on extraction of sub-soil water. The area wise break-up of the DC's own water supply schemes is provided below;

Table 6: Water supply schemes operated by DC

Source	GADAP	BIN QASIM
KWSB's main water line	26	64
Sub-soil water	93	49
Total	119	113

Source: Water and Sanitation Department, DC

3.8.2 Sewerage System

96. Karachi generates approximately 350-392 MGD of sewage. However the three operational waste water treatment plants have a combined capacity to treat only 151 MGD and out of these three, only one is currently functional. The situation is further aggravated due to the aging sewer network and operational losses at the treatment plants. Consequently, only 40 to 80 MGD of sewage is actually treated[52]. A large amount of the sewage flows directly into open drains and storm water drains given the lack of an adequate disposal system. Through Malir and Lyari rivers — which have been transformed into huge open sewers — this sewage ultimately ends up in the Arabian Sea, causing extensive environmental damage.

97. There are no estimates available on the number of settlements in Karachi linked to the underground sewerage system. The sewerage network in Karachi is old, poorly maintained and not properly networked to treatment systems. This has resulted in system blockages, raw system overflows and considerable environmental damage.

98. The collection, treatment and disposal of both domestic and industrial wastewater within the city district is primarily the responsibility of KW&SB that operates an extensive sewer network along with three Sewage Treatment Plants (STPs). However, due to low treatment

[50] Different estimates in different studies, which could be due to the time gap between them and methodology used.
[51] KW&SB
[52] Discrepancy in no. reported in different studies

capacity and poor interconnectivity between elements of the sewerage system, much of the wastewater generated in the city is discharged untreated into the storm water drainage system and thence to Karachi Harbor and the Arabian Sea.

99. Household sanitation within the inner city is reasonably good with a relatively high incidence of sanitary toilets within households and of connections to a sewer network. The 1998 population census revealed that 92.8 percent of households within the city had separate latrines, 4.1 percent had shared latrines, while only 2.1 percent had no toilet facility. There is a good record of collaboration between the government and the NGO sector regarding provision of sewerage services in Karachi.

3.8.3 The Drainage System

100. There are two types of drainage in Karachi — storm water drainage and surface drainage. Karachi's drainage situation is complex; it has several natural and man-made drainage systems, two drainage basins, large natural drains, storm water drains along roads and combined 'sewer and storm' water drains.

101. According to the Orangi Pilot Project, Karachi has 41 major drains.[53] These drains are about 167 KM in length and discharge into two non-perennial rivers, i.e., the Malir and the Lyari, which run through the city districts. Gujjar Nala is among the main streams of Karachi beside the Orangi stream which is a tributary of the Lyari River. The Gujjar Nala is an ephemeral stream which flows through the megacity of Karachi from north-east (North Karachi Sector 11J) to the center and merges with Lyari River in Liaqatabad Area before draining into the Arabian Sea. Most of the Gujjar Nala passes through the Karachi Central District while the remaining passes through Karachi West District. The Nala carries waste generated from industrial and domestic activities — these activities can generate up to 472 MGD of waste water in Karachi. Minor drainage networks (about 1,000KM in length) are the responsibility of the town councils. However, conflicts arise from the fact that much of the storm water drainage network also functions as part of the wastewater disposal system as a result of which maintenance is largely neglected.

102. Sindh Katchi Abadi Authority reveals that there are 5,639 slums in Karachi and a majority of them are built alongside drains. Karachi faces the threat of flooding mainly due to unrestrained housing and encroachment on natural waterways coupled with dumping of solid waste into storm water drains. As the settlements keep swelling, the drains are constricted, blocking the natural water paths. According to KMC, Gujjar Nala used to be 200 feet wide and now its width has been reduced to 15 feet. These compounding factors have increased the frequency and intensity of flooding in certain neighborhoods. Karachi has witnessed urban flooding in 2006, 2011, 2012, 2013 and 2017. The city lacks a full assessment of the drainage system's conditions and performance required to develop an adequate city flood management plan.

103. Urban flooding is most likely to become an even more serious issue – directly affecting tens of thousands and possibly affecting millions indirectly. Different parts of the city are inundated during heavy downpours such as North Karachi, North Nazimabad, Drigh Road, NIPA, Orangi, Malir, Northern Bypass, and colonies located on either side of one of the city's longest drains, the Gujjar Nala. Many underpasses were inaccessible as they were completely

[53] These drains include Gujjar Nala, Orangi Nala, CBM Nala, Chakra Goth Nala, Nasir Colony 2100 Road Nala, Chakore Nala, Soldier Bazaar Nala, PECHS Nala, Mahmood Abad Nala and other drains scattered across the city.

submerged. These drains would normally bring rainwater from across the city to either Lyari River or Malir River, which would then drain into the Arabian Sea.

104. The key issue in the drainage sector is maintaining adequate storm water drainage infrastructure by (i) avoiding encroachments by unplanned low-income settlements along drainage channels; (ii) improving the hydraulic performance of the drainage networks; (iii) ensuring that drainage lines are kept clear, clean and well-maintained (iv) separating wastewater systems from storm water systems so that responsibility for storm drain maintenance can be returned to those originally responsible; and (v) urgently developing a Storm-Water Drainage Master Plan , developing programs to establish and maintain drainage rights of way, and introducing a system of routine drainage maintenance.

3.8.4 Solid Waste

105. Solid waste management has become a daunting task for LCs authorities which seem to lack the capacity to deal with the escalating waste production. Statistics indicate that on a daily basis, approximately 12,000 tons of solid waste is generated in Karachi alone, out of which forty percent can be found on the city streets. Improper management of solid waste is causing the spread of infectious diseases and environmental pollution.

106. Solid Waste Management within the City is the combined responsibility of Sindh Solid Waste Management Board (SSWMB) and DMCs. In addition, the Cantonment Boards, Karachi Port Trust and Pakistan Steel Mills carry out their own waste collection and waste transportation. The key agencies responsible for collection are the town councils who either use their own equipment or contract private sector operators for managing and operating the primary collection system. KMC is responsible for the maintenance and operation of the land fill sites at Jam Chakro and Gond Pass located each at 35 km from the city center.

107. Public opinion and perception of solid waste management system is characterized by irregularity and inefficiency of the collection system as well as poor monitoring of the private waste service providers by the local authorities. Most of the households recognized solid waste management as a major problem. It was also revealed that residents currently pay for waste management services to private waste pickers. Strategies to address solid waste problem will need to consider an adequate supply of containers, intensive public education and introduction of user fees for waste management services.

3.8.5 Power Supply

108. Supply of water depends on the availability and quality of electricity in the towns, although almost all of the households were reported to have an electric connection in their household. However, electric supply was found to be very erratic in informal settlements. Due to irregular electric connections, operation of water pumps is interrupted and a steady supply of water is stalled. It has been observed that many settlements get water only once in a week. This has serious implications on enhancing coverage by generating a demand for piped water supplies because it invariably requires pumping.

109. Karachi Electric Supply Corporation (KESC) has a generating capacity which is 9 percent of the total power generated nationally (1,756 MW).It generates, transmits and distributes electricity to domestic, institutional and industrial users. Current peak demand outstrips supply by an estimated 518 MW or 24% of generation capacity. This results in frequent load-shedding during periods of peak demand in summer with serious consequences

for the economy. In recent years, frequent electricity load shedding has also led to civil unrest in some areas of the city.

110. In addition to the shortfall in supply, there are serious problems with the distribution network. Many of the feeders are overloaded which adds to transmission losses and outages. A significant number of feeders are very long which further increases transmission losses. While there are 1.4 million paying domestic consumers and 400,000 commercial, institutional and industrial consumers within the service area, it is estimated that more than 350,000 consumers are illegally connected to the system and do not pay for the power that they consume. The combined transmission, distribution and administrative losses are over 37 percent of supply.

3.8.6 Public Transport

111. There are various estimates relating to the number and types of public transport available in Karachi but broadly speaking, over 90% of the Karachi's public transportation is comprised of privately owned buses and mini-buses. [54] Out of these, various studies estimate that there are approximately 13,500 to 20,209 minibuses and coaches in Karachi. In addition, according to different estimates, there are 13,613 (2002) to 44,480 (2007) taxis and 23,337 rickshaws in the city[55]. This substantial involvement of the private sector in fulfilling the transport requirements of the city can be largely attributed to the limited capacity of the government to provide an efficient and affordable public transport system. It is important to note that the government owned Karachi Transport Corporation (KTC), shut down its services comprising of 800 buses in 1997 due to lack of funds and unsustainable losses.

112. Available public transport system in Karachi is also highly gender insensitive (as other sectors in Pakistan due to the overall socio-cultural context). A study by URC reports that women respondents complain about non-availability of female seats, having to sit on hot engine cover in buses, harassment, and unnecessary touching by male drivers and conductors.

113. The urgent need for a public transport system specifically for just one sub-set of the population can be gauged form the fact that morning peak hour traffic is largely generated by travel to educational facilities. A research study conducted by JICA in 2005 reports 15.43 million trips to educational facilities per day. Out of a total of 24.227 million trips made on a typical weekday, 60% are for schooling purposes. This number sheds light on the immediate need to address the transportation needs of the education sector. In order to substantially reduce traffic congestion, there is a need for providing student specific transportation on various routes, providing reserved seats for students, and involving private educational institutions to provide transport facilities for students.

3.8.7 Roads

114. The Karachi Metropolis Corporation (KMC) is responsible for the maintenance and upkeep of all major roads within the city, and District Municipal Corporations (DMC) are responsible for the secondary/tertiary roads (176 KM in length) along with associated drainage

[54] largely owned and run by Pukhtuns

[55] Other modes of transportation consist of Suzuki pick-ups, horse-drawn victories and carts, and boats (operating between the port and certain settlements located across the bay). The Karachi circular railway also operates within the city however servicing a negligible fraction of the population.

and street lighting. Maintenance budgets come from federal, provincial and district sources and new construction and maintenance works are contracted out - although contractors frequently hire back the plant owned by the Works and Services department in order to undertake the works.

3.8.8 Fire Services

115. Under the Sindh Local Government Ordinance (SLGA) of 2013, the KMC is responsible for the maintenance of a fire brigade for the prevention and extinction of fires. However, the Karachi Fire Brigade does not possess adequate staff, fire stations and equipment to cover a city of over 13 million people which creates a serious shortfall in fire service coverage. There is a serious need for trained fire-fighting staff as well as hydrants – of which there are only nine in the city.

3.9 Crime and Violence

116. The violence in Karachi is a deep-rooted, multifaceted phenomenon which is deeply rooted in history. During 1980s, the city became an ethnic flashpoint as violence became more pronounced among different communities on ethnic, linguistic and religious lines. Led by local political power, various ethnic groups started competing (often violently) for scarce resources, fueled by widespread poverty and unemployment resulting in extortion, ethnic violence, street violence and targeted killings. Karachi has also been a battlefield for political parties who strive to gain or retain their influence in different ethnically segregated constituencies — providing a favorable environment for terrorists to seek sanctuaries in Karachi.

117. The first instance of ethnic violence in Karachi was in late 1986 and the city remained in the grip of a violent conflict during the next five years, which destabilized the city during that period[56]. In the nineties, Karachi witnessed an increase in petty crimes, extortion, and kidnappings that further escalated in 2012. The city saw a 50% increase in its murder rate. More than 2,500 people were killed. 2013 was the worst year in terms of violence and the Human Rights Commission of Pakistan reported that 1,700 people were killed in the first half of 2013 alone. The Karachi was tagged being the most dangerous city of the world.

118. Apart from ethnic-based instability, Karachi has also experienced episodes of religious and sectarian violence over the last two decades. From the mid-1990s to the early 2000s, Karachi has witnessed a spate of targeted killings on religious, sectarian basis. In 2009, one particular militant group established a presence in the city and was involved in several bombings and killings of minority sects. Violence perpetrated by the militant groups reached its zenith in the run up to the 2013 national elections.

119. However, with collaborative efforts by security forces and civil administration, Karachi, once the sixth most dangerous city of the world with 81.34 crime index has been able to improve its ranking tremendously in 2014 by clinching 58th position (with safety index of Karachi 41.88) on international crime index[57].

[56] Azmat Ali Budhani, Haris Gazdar, Sobia Ahmad Kaker, and Hussain Bux Mallah, “The Open City: Social Networks and Violence in Karachi,” Crisis States Research Centre Working Paper no. 70 (2010)

[57] International Crime Index, issued by Numbeo, the largest user-contributed database about cities and countries worldwide. The index, which ranked 327 cities of the world, is an estimation of overall level of crime in a given city or a country. Crime levels lower than 20 are considered as “very low,” crime levels between 20 and 40 as being “low,” crime levels between 40 and 60 as being “moderate,” crime levels between 60 and 80 as being “high” and crime levels higher than 80 as being “very high.”

120. Gradually, it started improving and in 2015, Karachi became the 10th most dangerous city while it was ranked 26th in 2016. The position has further improved and in 2017, Karachi ranked at 47th in the world and in 2018, it ranked 50th out of total 327 cities of the world.

121. There have been some significant changes in operations by security agencies in the city since 2016, which have led to a reduction in violent crime and, to some degree, the containment of political and religious violence and criminal activity. Urban segregation and social exclusion, however, continue to be challenges that require immediate attention.

122. Despite the fact that law enforcing agencies have been continuously directing large-scale security operations which have resulted in improvements in several categories, the violent crime rate remains high. According to Citizens Police Liaison Committee (CPLC) statistics for 2017, the number of violent crimes (murder, kidnapping for ransom) remains about the same as 2016, and significantly lowers than 2015, and this trend shows improvements in Sindh province will continue.

123. In addition to that, other crimes and scams are also common in Karachi and include cell-phone and motor cycle theft, credit card frauds, and counterfeit-money schemes. The use of skimming devices on ATMs has risen in the city, attributed by police to foreign organized crime groups. Some police and business contacts have expressed concern about emerging cases of fraud and counterfeit products from these groups due to the large influx of some foreign citizens in Karachi.

124. Young men are particularly vulnerable to be recruited for violent acts in Karachi. In Karachi, more than 67 percent of the population is under the age of 25, putting young men, predominantly in less well-off areas, at risk of recruitment into violent gangs. Some of the major reasons behind youth involvement in violence are poverty, lack of education opportunities, and limited access to positive social interactions[58].

125. Use of drugs is another major issue, Karachi, where marijuana is illegal, remains the second largest cannabis consuming cities in the world with almost 41.95 tones used in 2018, according to the Weed Index-2018 Report. New York takes the top spot with 77.44 tones and New Delhi comes in third with 38.26 tones use of the drugs.

126. Apart from petty crimes, Karachi is currently doing much better than it has in the past few years. Business is coming back to City and the crime rate has gone down significantly. **Table 7** provides crime statistics from the month of October 2018.

Table 7: Crime Statistics -October 2018

S. No	Crime	Count
1	4 Wheelers Snatched	8
2	4 Wheelers Theft	71
3	4 Wheelers Recovery	40
4	2 Wheelers Snatched	168
5	2 Wheelers Theft	2206
6	2 Wheelers Recovery	358
7	Mobile Phone Snatched	1449

[58] Search for Common Ground Pakistan 2014

S. No	Crime	Count
8	Mobile Phone Theft	2019
9	Mobile Phone Recovery	208
10	Extortion	3
11	Killing	19

Source: CPLC, Nov. 2018

3.9.1 Gender-based Violence

127. As is the case with other urban centers in Pakistan, violence against women is rampant in Karachi. Besides domestic violence, several women activists have been assassinated in Karachi in recent years. A report furnished by Sindh's Women Development Department shows a total of 228 cases related to various types of violent acts that were filed by women in Karachi between 1 July 2017 and 31 March 2018. The report counted cases registered at various Women Complaint Cells and the Benazir Bhutto Centre for Women in Sindh. **Table 8** provides a breakdown of cases related to gender-based violence that were recorded during this time period.

Table 8: Gender Based Violence

S. No	GBV Cases	Count
1	Honor Killing	3
2	Sexual Assault	1
3	Violence and Harassment	23
4	Murder and Kidnapping	5
5	Others*	196

*Cases of custody of children or maintenance, dissolution of marriage/recovery of dowry articles/dowery amount etc.

3.10 Current Anti-encroachment (AED) Drive in Karachi

3.10.1 Scale of Physical and Economic Displacement

128. Encroachment is a complex phenomenon in Karachi and a much larger issue than simply one of low-income groups or the poor occupying public space. It is directly linked to a lack of 'inclusive' city planning, which prioritizes use of public land for the housing and economic and commercial needs of low-income groups, and issues of governance and enforcement of law. Critically, encroachment sustains the street economy which provides livelihood to the majority of the poor. According to earlier estimates, 72 percent, or approximately 1.2 million, of jobs in Karachi are in the informal economy.[59] However, encroachment has also had a detrimental effect on the city: it has led to the blocking of the city's natural drainage channels; reduced access to open public spaces such as parks; use of public spaces for hazardous work; and, worsening of traffic problems due to restricted movement of traffic and illegal parking. Hence, encroachment is a problem that cuts both ways.

[59] Arif Hasan, "Anti-Poor Bias?" *Dawn*, November 28, 2018

129. Periodically, the state undertakes ‘anti-encroachment’ drives to reclaim space. In general, eviction or reclamation drives lack public support as, in most cases, they result in the demolition of homes and businesses and eviction of families belonging to low income groups. In many cases, encroachers return to the spaces that are forcefully ‘cleaned up’; hence, anti-encroachment drives are invariably redundant.

130. A major anti-encroachment drive was initiated in the city in October 2018 on the order of the Supreme Court of Pakistan and is underway across the city. The Court ordered for the removal of encroachments from public spaces (parks, footpaths, amenity plots, etc.) across the city of Karachi, to be implemented by KMC and other civic, local and law enforcement agencies. The order is currently under implementation by various agencies, primarily KMC. A GoS review petition urging the Court to reconsider its decision - on humanitarian grounds and given the risk of social conflict - was turned down. In the meantime, some evicted hawkers have started returning to cleared areas. The issues remain complicated due to political divisions and institutional dynamics that characterize Karachi’s political and governance landscape. The drive has affected thousands of small businesses, street vendors and hawkers.

131. According to KMC, a total 7,183 shops, 8,000 sunshades, 5,000 cabins, stalls, counters, pavements and other encroachments have been razed and confiscated during the operation so far. The drive led to public outcry and authorities announced that all tenants of the KMC would be resettled in other markets.



Figure 7: AED in Karachi Courtesy: Dawn December 08, 2018

132. The drive to vacate illegally occupied state land will have significant livelihood impacts on thousands across the city. Loss of livelihood and displacement has become a recurring feature due to anti-encroachment drives and the street hawkers and daily wagers who work

in the informal sector are most affected. The scale of eviction in the current anti-encroachment drive has put thousands of low-income families at risk.

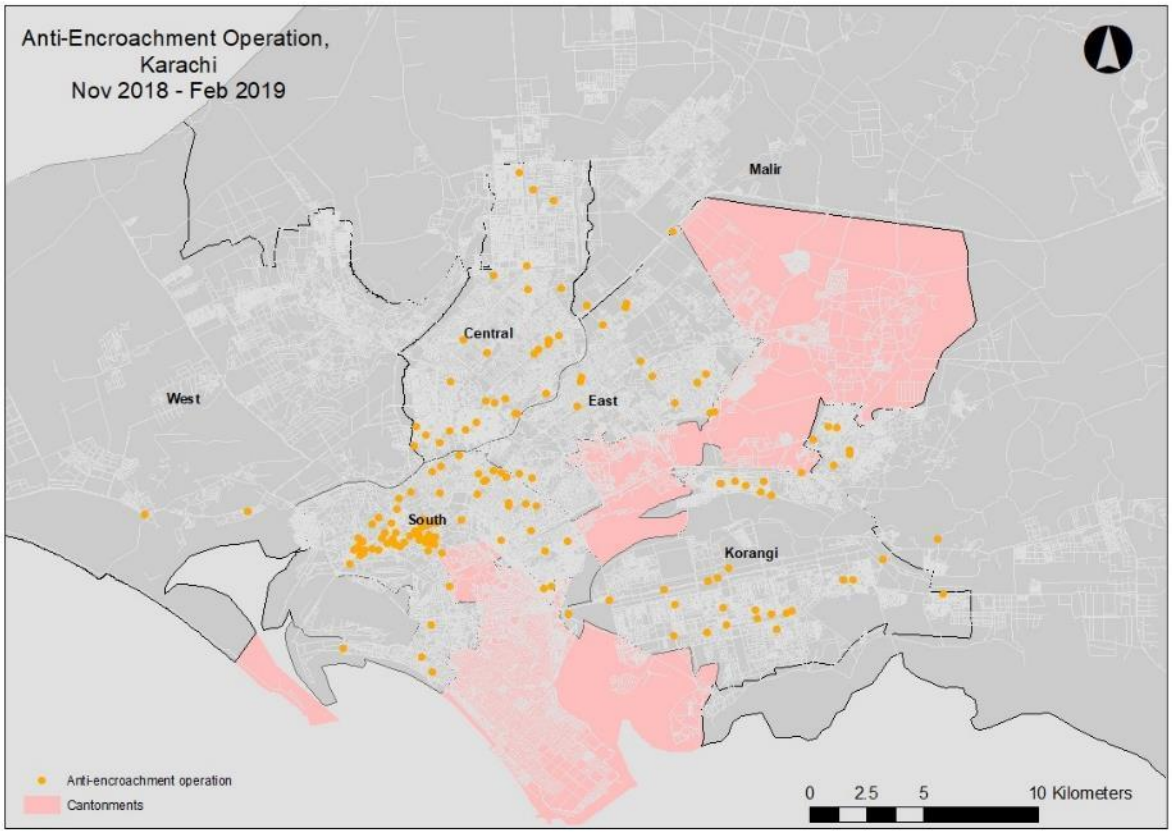


Figure 8: Map of AED implemented by KMC during Nov 2018 and Feb. 2019

133. In Karachi, encroachment poses significant challenges is closely linked to issues of governance. The current demolition of holdings has affected the businesses that had been operating for over three decades along with the associated businesses of suppliers and retailors. Due to the informal nature of many businesses and the presence of scores of support services that sustained the business activities, accurately projecting the public and private financial loss is extremely difficult and requires careful and systematic analysis. While the financial cost of the anti-encroachment drive appears to be high, determining the exact quantum has not been possible as the campaign is still underway. Relevant government departments and institutions have yet to initiate an exercise to gauge the financial and social costs in a systematic manner. The anti-encroachment drive has also placed excessive financial burden on the agencies involved as they do not have the requisite budget to undertake the required demolition activity and remove the rubble in an efficient manner.

3.10.2 Civil Society Perspective on the Physical and Economic Displacement

134. Civil society groups including the Human Rights Commission of Pakistan (HRCP), Women Action Forum (WAF), Urban Resource Centre (URC) and Joint Action Committee (JAC), Karachi have expressed grave concerns over the impact of the anti-encroachment drive in Karachi. They have condemned and protested against the demolition of small shops, houses (limited number at present as the drive is primarily focused on commercial activity) and work places in different parts of Karachi under the anti-encroachment drive. They have

also expressed concern about the impact on the informal street economy which includes street vendors and hawkers.

135. According to HRCP, “protecting people’s fundamental right to a livelihood must always take priority in urban planning. The sheer scale on which shopkeepers and hawkers have been evicted puts thousands of low-income families at risk of almost immediate poverty.” HRCP strongly urged Karachi’s policymakers and planners to implement a fairer compensation and resettlement plan which would ensure that the families affected are fairly compensated and rehabilitated.

136. Key concerns that have been raised by civil society organizations are summarized below:

- The destruction has severely affected small businesses and livelihood of mainly those who belong to lower socio-economic groups.
- A unilateral approach has been adopted during the exercise as no attempt was ever made to take into confidence or hold dialogue with the inhabitants of the targeted areas.
- Sudden dismemberment of properties was said to have severely compromised the economic base of effected population as most of them have no alternative options to sustain their living.
- Activists enquired whether it was justified to initiate the campaign without any resettlement provisions for those expected to abandon the sites.
- Condemnation of alleged discrimination against the poor during the campaign as allegedly, the drive focused on small businesses, vendors and shopkeepers while a majority of big businesses and influential people remain unaffected.
- Highlighted the need for greater accountability and transparency.
- There is a need to compensate and/or relocate those affected by the encroachment drives.
- Many believed that the Supreme Court’s orders had not been interpreted properly and traders/shopkeepers had been forcibly evicted without any alternative plans or adequate prior notice.
- Highlighted the need for proper mapping, surveying and data collection before such drives are conducted.
- Lack of sufficient coordination among various government departments, agencies and institutions.
- Shopkeepers and hawkers had not been given sufficient time during the campaign.
- Leaving such a huge number of people homeless and jobless will not only increase the crime rate but also stoke several other social and psychological issues in the society.

137. While the state should discourage land grabbing and illegal constructions, in cases where evictions become essential, efforts must be made to not only minimize the total number of structures to be demolished but also to provide adequate compensations to cover all sorts of socio-economic losses. There is a need for a comprehensive and consistent policy for relocation of and compensation for the affected persons.

3.10.3 World Bank Policy Provisions

138. The World Bank's Safeguard Policies are designed to prevent Bank-financed operations from causing adverse impacts. The Sourcebook on Involuntary Resettlement states: "If resettlement for the project begins before initial discussions with the Bank and the acquisition of the area is directly linked to the Bank project, then the substantive aspects of OP 4.12 apply retroactively. In other words, if an area is being cleared in anticipation of, or preparation for, a project, OP 4.12 would apply"[60].

139. During project appraisal, the Bank should be required to determine whether displacement has already occurred to make way for the project. When this circumstance arises, the Bank should assess whether the objectives of the involuntary resettlement policy have been met for those displaced prior to approving funding for the project. To the extent that policy objectives have not been met, the implementation of a comprehensive remedial action plan should be required as a precondition to allowing disbursement of funds for the project. In the absence of these measures, the Bank will be viewed as complicit in the adverse impacts suffered by those displaced regardless of the temporal lapse.

140. OP 4.12 covers all components of the project that result in involuntary resettlement, regardless of the source of financing. It also covers activities that, in the judgment of the Bank, are: directly and significantly related to the Bank-assisted project; necessary to achieve the project's objectives; and carried out contemporaneously with the project. This means that activities that fall outside the remit of "the project" but are critical to the Bank investment in the ways defined above, are covered by the policy if they occur at around the same time as the Bank project.

3.10.3.1 World Bank Policy on Involuntary Resettlement

141. World Bank policy (OP 4.12) aims to avoid involuntary resettlement as far as possible, or to minimize its negative social and economic impacts. Specifically, OP 4.12 stipulates that development projects should avoid or minimize involuntary resettlement, but in cases where it is unavoidable, when people lose their homes or livelihoods as a result of the project implementation, their standard of living should be restored at least to pre-project levels or better conditions.

142. The OP 4.12 also emphasizes that affected persons should be assisted in their efforts to improve or at least to recover their incomes and their living standards after the project interventions. The policy requires the implementing borrower agencies to prepare appropriate resettlement planning instruments prior to deciding of investments that may impact on people, their property and livelihood.

Compensation for the Affected Persons

143. The first objective of OP 4.12 is to avoid and minimize involuntary resettlement wherever feasible. This objective reflects the Bank's recognition of the "severe economic, social, and environmental risks" of displacement. Avoiding displacement thus translates into reduced risk. OP 4.12 requires that either replacement cost compensation or actual replacements be provided to affected persons for lost housing structures and other assets[61].

[60]. World Bank Sourcebook on Involuntary Resettlement (2004), page 8
[61] OP 4.12, para 6.

144. The policy objective is to assist displaced people "in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher[62]." The objective is also to provide sufficient investment resources to enable the persons displaced by the project to share in project benefits[63]."

145. These objectives are to be met, where necessary, by (i) offering support to displaced persons, "for a transition period, based on a reasonable estimate of the time likely to be needed to restore their livelihood and standards of living;" and (ii) providing them with development assistance "such as land preparation, credit facilities, training, or job opportunities."

146. The policy should require that all affected people are informed and meaningfully consulted on the project at the earliest stages and throughout the project cycle, using accessible communication methods and language. Informed and meaningful consultations should be conducted in relation to the public value of the project, the findings of impact assessments, the exploration of alternatives and the design of resettlement plans and process frameworks

147. The client will offer all project affected people's compensation for loss of assets at full replacement cost and other assistance. This is intended to restore, and potentially improve, their standards of living and/or livelihoods to pre-project levels.

148. The measures can be based on land, resources, wages and/or business activities. Standards for compensation will be transparent and consistent within the project. Compensation will be provided before affected or imposition of access restrictions.

149. Affected persons/communities should benefit from the project.

Compensation to land-based communities

150. Where livelihoods of affected persons are land-based, or where land is collectively owned, the client will offer, where feasible, land-based compensation, taking into account seasonal and agricultural timing requirements.

151. Affected persons are classified as persons:

- who have formal legal rights to the land (including customary and traditional rights recognized under national laws);
- who do not have formal legal rights to land at the time of the census, but who have a claim to land that is recognized or recognizable under national laws; or
- who have no recognizable legal right or claim to the land they occupy.

152. All affected persons should get compensation, if they were in the area before the cut-off date. In case of economic affected, if temporary or permanent loss of income or livelihood take place, regardless of whether the affected people are physically displaced, the client will compensate to affected persons for all losses to physically and economically affected persons:

- with legal rights or claims to land which are recognized or recognizable under the national laws provide replacement property (for example, agricultural or commercial sites) of equal or greater value, or cash compensation at full replacement cost where

[62] OP 4.12, para 2(c).
[63] OP 4.12, para 2(b).

appropriate;

- without legally recognizable claims to land compensate for lost assets other than land, at full replacement cost.

4 GENERAL POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

4.1 Overview

153. This section outlines and reviews legislations, policies and institutions that are of relevance to the implementation of the project while identifying requirements, gaps and conflicts of the legal and institutional arrangements that would hinder or guide the development of the project in line with national and international laws applicable to CLICK. It is important that national projects are in line with Pakistan's international obligations since the country has signed various international treaties and conventions, some of which are also reviewed in this Section.

4.2 Applicable National Policies and Legislation

4.2.1 Constitution of Pakistan (1973)

4.2.1.1 Protection of the Rights of Individuals to Private Property

154. The Constitution includes provisions to protect the rights of individuals to private property. The Article 23 of the Constitution establishes the right of every citizen to acquire, hold and dispose of his/her property in any part of the country. Furthermore, Article 24 of the Constitution is related to the protection of property rights and is of direct relevance to the Project.

4.2.1.2 Gender Equality

155. The Constitution guarantees equal rights and equal treatment to all citizens/ persons, without any distinction including on the basis of sex. Following articles of the Constitution broadly cover the rights of women:

- Article 3 calls upon the State to eliminate all forms of exploitation.
- Article 4 provides for the right of every individual to enjoy the protection of law and to be treated in accordance with the law. This applies to the citizens as well as "to every other person for the time being within Pakistan" without distinction. This article also clearly states that certain rights cannot be suspended.
- Article 25 ensures equality before the law and equal protection of the law and states that there shall be no discrimination on the basis of sex.
- Articles 25(3) and 26(2) allow the state to make special provisions for the protection of women and children.
- Article 26 & 27 provide for equal access to public places and equality of employment in the public and private sector.
- Articles 11 & 37 (g) prohibit trafficking in human beings as well as prostitution.
- Article 32 makes special provisions for the representation of women in local Government.
- Article 34 directs the state to take appropriate measures to enable women to participate in all spheres of life and social activities.
- Article 35 directs the state to protect the marriage, the family, the mother and the child.

- Article 37 (e) directs the state to make provisions for securing just and humane conditions of work, ensuring that children and women are not employed in vocations unsuited to their age or sex, and ensuring maternity benefits for women in employment.
- Articles 51 & 106 provide for the reservation of seats for women in the legislative assemblies.

4.2.1.3 Labor Rights

156. The Constitution of Pakistan contains a range of provisions with regards to labor rights that can be found in "Part II: Fundamental Rights and Principles of Policy"2.

- Article 11 of the Constitution prohibits all forms of slavery, forced labor and child labor;
- Article 17 provides for the fundamental right to freedom of association and the right to form unions;
- Article 18 guarantees the right of every citizen to gain employment in any lawful profession or occupation and to conduct any lawful trade or business;
- Article 25 lays down the right to equality before the law and prohibition of discrimination on the grounds of sex;
- Article 37(e) directs the state to make provisions for securing just and humane conditions of work, ensuring that children and women are not employed in vocations unsuited to their age or sex, and ensuring maternity benefits for women in employment.

4.2.2 Pakistan Environmental Protection Act, 1997

157. The Pakistan Environmental Protection Act, 1997 is the basic legislative tool empowering the government to frame regulations for the protection of the environment. The Act is applicable to a broad range of issues and extends to socioeconomic aspects land acquisition, air, water, soil, marine and noise pollution, as well as the handling of hazardous waste. The powers of the federal and provincial Environmental Protection Agencies (EPAs), established under the Pakistan Environmental Protection Ordinance 1983, have also been considerably enhanced under this legislation and they have been given the power to conduct inquiries into possible breaches of environmental law either of their own accord, or upon the registration of a complaint.

4.2.2.1 Guidelines for Public Consultation (1997)

158. The Pakistan Environmental Protection Act 1997 requires public participation during the review of an EIA (section 12 (3)). The "policy and procedure for the filing, review and approval of environmental assessments" requires the proponents to consult with the affected community and relevant NGO's during the preparation of an environmental report.

4.2.3 Land Acquisition Act (1894)

159. In Pakistan, the governing legislation for land acquisition and compensation is the Land Acquisition Act (LAA) of 1894 with successive amendments, which regulates the land acquisition process and enables the federal and provincial governments to acquire private land for public purposes. Land acquisition is a provincial subject and each province has its own interpretation of the Act, and some have their own province specific implementation rules.

160. The law deals with the matters related with acquisition of private land and other immovable properties existing on the land for the public purpose. The public purpose, *inter alia*, includes the construction of development projects of public interest. The LAA specifies a systematic approach for acquiring and compensation of land and other properties for development projects. It stipulates various sections pertaining to notifications, surveys, acquisition, compensation and apportionment awards and disputes resolution, penalties and exemptions. A few relevant sections were synthesized from the LAA Act 1894 are summarized below.

Table 9: Salient Features of the LAA (1894) and its Successive Amendments

Key Sections	Salient Features of the LAA (1894)
Section 4	Publication of preliminary notification and power for conducting survey.
Section 6	The Government makes a more formal declaration of intent to acquire land.
Section 7	The Land Commissioner shall direct the Land Acquisition Collector (LAC) to take order the acquisition of the land.
Section 8	The LAC has then to direct the land to be marked out, measured and planned.
Section 9	The LAC gives notice to all APs that the Govt. intends to take possession of the land and if they have any claims for compensation that should to be made to him at an appointed time.
Section 10	Delegates power to the LAC to record statements of APs in the land or any part thereof as co-proprietor, sub-proprietor, mortgagee, and tenant or otherwise.
Section 11	Enables the Collector to make enquiry into measurements, value and claim and issue the final “award". Included is the land's marked area and valuation of compensation.
Section 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.
Section 18	In case of AP’s dissatisfaction with the award who may request the LAC to refer the case onward to the court for decision. This does not affect the taking possession of the land.
Section 23	The award of compensation for the owners for acquired land is determined at its market value plus 15% in view of compulsory nature of the acquisition for public purposes.
Section 28	Relates with determining compensation values and interest premium for land acquisition
Section 31	The Section 31 provides that 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.

161. The LAA prescribes provisions for fair and adequate compensation for land acquired involuntarily, however, its enforcement marred with many lacunas due to the bureaucratic ineptness and the whole process from notification to compensation and grievance resolution often encumbered with inordinate delays and under the guise of eminent domain the state coercively acquires the citizens property and agonizing and pushing them in impoverishment with a little recourse. In addition, the LAA procedures do not entail the consultation and participation of affected people but leave the entire process to the discretion of the revenue department and implementing agency.

162. The framework of the LAA is generally considered to be constricted in scope and inadequately take into account the rehabilitation and resettlement of displaced populations and restoration of their livelihoods. The LAA also does not specifically provide any assistance for the poor, vulnerable or severely PAPs, nor does it cover for livelihood losses or resettlement costs for rehabilitation. Generally, it is limited to a cash compensation policy for the acquisition of land and built-up property, and damage to other assets such as crops, trees, and infrastructure. Consequently, a National Resettlement Policy and Resettlement Ordinance in 2002 with a wider scope of eligibility and entitlements had been drafted. However, the national policy and ordinance have yet to be officially approved, notified and enacted. In order to fill the vacuum, currently some transient measure are taken to compensate adversely affected non-titled people, non-registered tenants, businesses and wage workers under project specific arrangements for their rehabilitation, payment of resettlement costs and assistance for livelihood restoration.

163. For different range of infrastructural and developmental functions, land acquisition laws are applied. Land Acquisition Act of 1894 allows the various government departments LCs authorities to apply to relevant Boards of Revenue or other authorities for acquisition of land for public interest projects.

4.2.4 Antiquity Act, (1975)

164. The Antiquities Act relates to the protection, preservation and conservation of archaeological/historical sites and monuments. This act is designed to protect antiquities from destruction, theft, negligence, unlawful excavation, trade and export. Antiquities have been defined in this act as “Ancient products of human activity, historical sites, sites of anthropological or cultural interest and national monuments etc.”

165. The act prohibits new construction in the proximity of a protected antiquity and empowers the government of Pakistan to prohibit excavation in any area that may contain articles of archaeological significance. Under this act, the proponents are obligated to ensure that no activity is undertaken in the proximity of a protected antiquity, and during the course of the project if an archaeological discovery is made, it should be reported to the Department of Archaeology accordingly

4.2.5 The Criminal Law (Third Amendment, Act 2011)

166. The Criminal Law (Third Amendment) Act 2011 was passed by the Parliament in 2011 and assented by the President on 16th December 2011. The Act amended relevant sections in the Pakistan Penal Code and Code of Criminal Procedures. The Amendment criminalized a number of customary practices such as giving women or girls in marriage for settling a dispute), forced marriage, marriage with the Holy Quran and depriving women of inheriting property. All these offences are made non-compoundable and non-bailable under this Act.

4.2.6 Employment of Child Act, (1991)

167. Article 11(3) of the Constitution of Pakistan prohibits employment of children below the age of 14 years in any factory, mines or any other hazardous employment. In accordance with this Article, the Employment of Child Act (ECA) 1991 disallows the child labour in the country. The ECA defines a child to mean a person who has not completed his/her fourteenth year of age. The ECA states that no child shall be employed or permitted to work in any of the

occupation set forth in the ECA (such as transport sector, railways, construction, and ports) or in any workshop wherein any of the processes defined in the Act are carried out.

4.2.7 Factories Act (1934)

168. The Factories Act, 1934 concerns regulation of labor in factories and addresses issues regarding labor, wages, working hours and health and safety. The Factories Act also briefly refers to environmental issues. Section 14 deals with the disposal of industrial wastewater and states that “effective arrangements shall be made in every factory for the disposal of wastes and effluents due to the manufacturing process carried on therein.” The Factories Act states that “the Provincial Government may make rules prescribing the arrangements to be made under sub-section (1) or requiring that the arrangements made in accordance with that sub-section shall be subject to the approval of such authority as may be prescribed. The Allows provincial governments to establish rules for factories, whose operation exposes persons to “serious risk of bodily injury, poisoning, or disease.”

4.3 Applicable Provincial Policies and Legislation

4.3.1 Sindh Environmental Protection Act (2014)

169. The main focus of the law is on sustainable development, protection, conservation, rehabilitation, and improvement of environment. It instructs the provincial government to establish the Sindh Environmental Protection Council. Under the law, EIA/IEE is essentially required for all the projects before commencing any construction activity. It prohibits specified discharges and emissions. Sindh Environmental Quality Standards are an essential part of the law. The SEPA empowers the provincial government to issue notices and to enforce the Act for the protection of the environment. The environmental and social legal and regulatory systems are considered to be adequate to address environmental and social risks. After the 18th Constitutional Amendment, environmental management has been delegated to the provincial governments.

4.3.2 Sindh Local Government Act (2013)

170. In 2013, the Sindh Government passed the Sindh Local Government Act (SLGA) providing a framework for the reinstatement of elected local governments for the first time in the province since 2010. This law provides a multitude of powers to the Provincial Government, giving them strong control over the functions of the LGs.

171. It aims to establish an elected local government system to devolve political, administrative and financial responsibility and authority to the elected representatives of the local governments; to promote good governance, effective delivery of services and transparent decision making through institutionalized participation of the people at local level; and, to deal with ancillary matters. In the nutshell, the local governments are administered by this act which defines their composition, functions, scope and other related matters.

172. Metropolitan governance in Karachi is framed by the SLGA 2013, with a metropolitan entity for the entire city area and district-level municipal entities. Newly elected local governments (LG) for Karachi came into office in August 2016 after a gap of six years. The **Table 11** provides structure of Local Bodies in Karachi under the SLGA, 2013.

Table 10: The Structure of Sindh Local Bodies, 2013 in Karachi

LG Structure	Mode of Elections
Union committees	Directly elected: Chairperson and Vice Chairperson (joint candidates) and four general members from their respective wards. Indirectly elected reserved seats: two women members, one labourers or peasant member, one youth member and one non-Muslim member.
District municipal corporations	(a) All the elected Vice Chairpersons of the Union Committees in Karachi urban districts, (b) Reserved seats: 33% for women members, 5% for non-Muslim members and 5% for labourers/ peasants members, to be indirectly elected by the members elected under sub clause (a). (c) The District Municipal Corporations so constituted shall elect a Chairperson and a Vice Chairperson respectively from amongst its members elected under sub clause (a).
Metropolitan corporation	(a) All the elected Chairpersons of the Union Committees of the districts of Karachi, (b) Reserved seats to the extent of 33% for women members, 5% for non-Muslim members and 5% for labourers/peasants members, to be indirectly elected by the members elected under sub clause (a). (c) The Metropolitan Corporation so constituted shall elect a Mayor and a Deputy Mayor from amongst its members elected under sub clause (a).
Karachi District Council (rural areas)	Union Council Directly elected: Chairperson and Vice Chairperson (joint candidates) and four general members from their respective wards Indirectly elected reserved seats: two women members, one labourers or peasant member, one youth member and one non-Muslim member District Councils Directly elected: One member from each Union Council in the district. Indirectly elected: Chairperson and Vice-Chairperson plus reserved seats: 33% for women, 5% for youth members.

4.3.3 The Sindh Local Government (Amendment) Act, 2017

173. The Sindh Assembly has adopted the Sindh Local Government Amendment Bill 2017 amending Section 27 of the Sindh Local Government Act 2013. The new amendment allows the councilors from no-confidence votes against the chairmen and vice chairmen of their respective union councils and committees in the province.

4.3.4 Sindh Public Property (Removal of Encroachment) Act, 2010

174. The Act, has been passed by the Provincial Assembly to avoid encroachment and provides measures for removal of encroachment from public property. The law specifies: powers to intervene, grievance redress and review mechanisms, eviction and recovery of cost of eviction in case of non-compliance, punishment for aiding and abetting the act of encroachment, rewards for outstanding performance in removal of encroachment, and setting up of grievance redress tribunals. The City Government will provide continuous oversight and reinforcement to facilitate that public spaces remain free from illegal encroachments as outlined in the Sindh Public Property (Removal of Encroachment) Bill, enacted in 2010.

4.3.5 Sindh High Density Development Board Act 2010

175. The Act promulgated to ensure coordinated and integrated development of high-density zones in the urban centers of the province including Karachi. The Law empowered the

board to identify and mark high density zones keeping in view the general principles of the Karachi Strategic Development Plan 2020.

4.3.6 The Karachi Water and Sewerage Board (Amendment) Act, 2015

176. Karachi Water and Sewerage Board Act, 1996 was amended to provide and maintain the safe and secure water supply for drinking and domestic use to residents of Karachi. Under the new amended Act, a new section has been be included “14-A. (1) If any person who – (a) damages, punctures water trunk mains ranging from 18 inch diameter to 84 inch diameter, canals, pumping stations, conduits, siphons, reservoirs and chambers of the Board for any purpose including selling of water or taking illegal connections; (b) establishes illegal hydrant for industrial, commercial or residential use; and (c) encroaches upon the land of the Board; shall be punished with imprisonment of either description for a term which may extend to ten years and with fine which may extend to rupees one million or with both.

4.3.7 Sindh Katchi Abadis (SKAA), Act 1987

177. Under the Sindh Katchi Abadi Act (SKAA) 1987, settlements can be declared as official *katchi abadis* and allows the right of urban squatters to rehabilitations. The SKAA envisages the regularization and provision of infrastructure to all squatter settlements on government land which were established before 23 March 1985. The SKAA was tasked to coordinate the process of awarding leases to the residents and to provide infrastructure and other basic services. It is a provincial wide agency that operates in other towns and cities as well as Karachi. The Act stipulates the transfer of government owned land to the urban squatters or allocates funds for cash assistance. The Act need to be updated and should include all de-facto land titleholders and ownership of the all existing settlements. Based on this SKKA 1987 the CLICK can provide rehabilitation compensation to encroachers or squatters affected by the project.

4.3.8 The Sindh Solid Waste Management Board Act, 2014

178. The Sindh Solid Waste Management Board Act, 2014 was adopted by the provincial assembly paving the way for establishing a centralized provincial authority for overseeing solid waste management affairs of the major urban centers while divesting these powers back from the municipal bodies. The “Sindh Solid Waste Management Board” for the collection and disposal of solid and other waste in the Province of Sindh.

4.3.9 The Sindh Differently Able Persons (Employment, Rehabilitation and Welfare (Amendment) Act, 2017

179. The Act provides for the employment, rehabilitation and welfare of differently able persons. The definition of "differently able" is any persons who on account of injury, disease or congenital deformity, is challenged for undertaking any gainful profession or employment in order to earn his livelihood and includes a person who is blind, deaf, physically challenged or mentally challenged. In the Sindh Differently Able Persons (Employment, Rehabilitation and Welfare) Act, 2014 was amended and job quota was increased from two percent to five percent. The Act also waived admission fees at public educational institutions for people with disabilities as well as 75% of tuition fee, along with establishing reserved seats.

Pakistan is a signatory of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

4.3.10 The Sindh Commission on the Status of Women Act, 2015

180. The Act has enabled the government to constitute a Commission to be known as the Sindh Commission on the Status of Women, to exercise the powers to examine the policy, programs and other measures taken or to be taken by Government for gender equality, women's empowerment, political participation, representation, assess, implementation and make suitable recommendations to the concerned authorities. In addition, the Commission will be responsible to review all provincial laws, rules and regulations prejudicial to the legitimate interest and rights of women and suggest accordingly.

4.3.11 The Sindh Domestic Violence (Prevention and Protection) Act, 2013

181. The Sindh Domestic Violence Act 2013 is based on a rich and gender-sensitive approach to domestic violence, defining it to include physical and psychological abuse. The law provides a wide range of remedies to victims of domestic violence, including the passage of protection orders to restrain the perpetrator of domestic violence from harassing the complainant, entering her residence or place of employment.

182. The passage of this Act came after 5 years of struggle by the Aurat Foundation, in collaboration with activists, jurists, lawyers and women legislators. The Act defines domestic violence as inclusive of but not limited to, all acts of gender-based, and other physical or psychological, abuse committed by a respondent against women, children or other vulnerable persons, with whom the respondent is or has been in a domestic relationship. The new law provides for up to 2 years of imprisonment for offenders, and fines ranging from PKR 1000 and PKR 50,000, and also calls for the formation of a special committee to educate the complainants about their rights

4.3.12 The Sindh Child Marriages Restraint Act, 2013

183. Sindh Assembly legislated this law and repealed the Child Marriage Restraint Act 1929, in the wake of 18th Amendment in Constitution of Pakistan 2010, which, *inter alia*, devolved the subjects of marriage and divorce to the provinces. The law raised the legal age of marriage for women from 16 years to 18 years. It also made child marriage non-bailable, non-compoundable and cognizable offence.

4.3.13 Sindh Bonded Labour (Abolition) Act 2015

184. The Act is gender sensitive, an anti-discrimination clause is added to each new proposed Law in accordance with ILO requirement *viz*: "No discrimination shall be made on the basis of sex, religion, political affiliation, sect, color, caste, creed, ethnic background in considering and disposing of issues relating to the enforcement of this Act". In all proposed Laws the cognizance has been changed from that of the Judicial Magistrate to the Presiding Officer Labour Courts who is a Session Judge.

4.3.14 Sindh Factories Act 2015

185. The Sindh Factories Act 2015 deals with regulations related to project area, workers and workplace Environment Health and Safety (EH&S) requirements. The Factories Act also provides regulations with provision for general health and safety of the work force in their work area. Conditions are specified for clean work place, toilets, waste handling, provision of drinking water quality, worker health and hygiene etc. As construction activity is classified as

'industry', these regulations will be also applicable to the project & construction contractors' scope of work.

186. Under the new Sindh Factories Act 2015, No occupier of a factory shall be allowed to start manufacturing process unless he has obtained factory registration certificate from the Directorate of Labour. The Act does not allow a child below the age of 14 years to work in a factory in any case. The new Law restricts the employment of contractual labour in manufacturing process.

4.3.15 Sindh Minimum Wages Act, 2015

187. The Laws relating to the minimum wages, i.e., the minimum Wages for Unskilled Workers Ordinance 1969, Minimum Wages Ordinance 1961, Cost of Living Allowance, and Sindh Employees Special Allowance have been merged in the Sindh Minimum Wages Act 2015

4.3.16 Sindh Payment of Wages Act, 2015

188. Under the Act, all wages shall be paid to the employed persons in current currency through crossed cheque or through bank transfer of any Scheduled Banks or commercial Banks along with pay slip showing the details. Notwithstanding anything contained in any other law for the time being in force, the dues of workers in case of closure, insolvency, winding up and liquidation, shall be recovered from the amount of proceedings of such closure insolvency, winding up and liquidation. Earlier there was no compensation to worker for delayed wages, new proposed Law extends compensation up to ten times as it is for deducted wages

4.3.17 The Sindh Occupational Safety and Health Act (2017)

189. The Sindh Cabinet has approved the Sindh Occupational Safety and Health Bill, 2017, following the incidents like *Baldia* factory fire which claimed 259 precious lives besides burn injuries to several others. The Sindh Occupational Safety and Health Act 2017 to make provisions for occupational safety and health conditions at all workplaces in the province for the protection of workers during work. Under the Act, an Occupational Safety and Health Council will be established in Sindh with secretary of Sindh government's Labour and Human Resources Department as its chairperson.

190. The proposed council lays down penalties in case of death and injury due to violation. In case of death sub-section 01 of section 38 will accord 2 years imprisonment or a fine of PKR 100,000 or both. Similarly, in case of injury the imprisonment may extend to six months or a fine up to PKR 20,000 or both.

191. These laws and regulations apply in any project situation where labor rights and protections are enforced. These laws are applicable to construction contractors and will be included in the bidding documents of the contractors.

4.3.18 The Sindh Transparency and Right to Information, 2016

192. The purpose of this Act to provide transparency and freedom of information to ensure that all citizens have better access to public information, to make the government more accountable to citizens, to enforce the fundamental right to information in all matters of public importance, toensure transparency in all Government matters. Transparency and access to informationare essential principles of democracy which not only enable the citizens to hold the

Government and their institutions accountable but also help in improving the system of governance.

4.3.19 Sindh Solid Waste Management Board (SSWMB) Act, 2014

193. The SSWMB Act, 2014 enacted to establish a board for collection and disposal of all solid waste, to arrange effective delivery of sanitation services, to provide pollution free environment and to deal with other relevant matters. The Board established under the Act headed by the Chief Minister or his nominee and constitutes of thirteen other ex-officio members of other relevant departments.

4.3.20 Sindh Cultural Heritage (Preservation) Act, 1994

194. Sindh Cultural Heritage (Preservation) Act of 1994 was passed by the Provincial Assembly in February 1994 and was enacted in April 1994. This act aims to preserve and protect ancient places and objects of architectural, historical, archaeological, artistic, ethnological anthropological and national interest in the Province of Sindh.

195. The act enables the Government to declare any premise or object of architectural, historical, archaeological or national value, after consultation with the Advisory Committee. The act also states that if it is apprehended, the act enables the Government if apprehends that a protected heritage is in danger of being destroyed, injured or allowed to fall into decay, Government may Acquire it under the provision of the Land Acquisition Act, 1894, as if the preservation of a protected heritage were a “public purpose” within the meaning of that Act. The Committee is responsible to maintain and preserve every protected heritage in respect of which Government has acquired any of the rights mentioned in section 7 or which the Government has acquired under section 12 of the Act.

196. The Act also mentions that if any person including the owner destroys, removes, injures, alters, defaces a protected heritage maintained by Government under this act or in respect of which an agreement has been executed under section 8 of the act, shall be punishable with fine which may extend to on lakh rupees, or with imprisonment which may extend to three years, or with both.

4.3.21 Karachi Strategic Development Plan 2020

197. The Karachi Strategic Development Plan – 2020 (KSDP-2020) has been prepared with the aim to transform Karachi into a world class city and an attractive economic center with a decent life for Citizen of Karachi. Karachi Strategic Development Plan 2020 had been approved by the City District Council Karachi in 2007, which aimed to set out a strategic framework and overall development direction and future pattern of the city over the year up to 2020 and beyond. The strategic plan, the first ever approved development plan, has now a legal status under Section 40 of the Sindh Local Government Ordinance, 2001.

198. According to the Local Government Department that Karachi that there are approximately 20 different land-owning agencies operating in Karachi under the federal and Sindh governments, therefore the plan is partially being implemented. The cases which are being forwarded to the Master Plan Group of offices, CDGK by the Board of Revenue of Sindh Government for their opinion as per zoning under the scrutinizing also part of strategic plan. Besides, with a view to decongest the inner-city area, under CDGK projects, about 2250 acres of land has also been reserved in Karachi Strategic Development Plan-2020 for shifting of wholesale market, etc., the same was reserved by the land utilization department of Sindh

government Under the plan, different agencies were contacted at the time of launching their projects.

4.3.22 Sindh Strategy for Sustainable Development (2007)

199. The Sindh Strategy for Sustainable Development proposes a ten-year sustainable development agenda for Sindh level. Its purpose is to highlight the ecological, economic and social issues of the province and to provide recommendations and strategic actions to address them. The strategy promotes the sustainable use of natural resources to achieve the objectives of poverty alleviation and social development through the participation of the people of Sindh.

4.4 Institution Responsible for Planning, Policies and Regulations

200. The institutional setting in Karachi has traditionally comprised various agencies at federal, provincial and local government levels with separate land areas, separate legal and administrative frameworks, and engaging in little institutional coordination. The resulting poor governance and regulation in Karachi affects not only the quality of city planning, infrastructure development and public and municipal services, but also impacts adversely on the country's economic growth and development prospects.

4.4.1 Sindh Environmental Protection Agency (SEPA) 2012

201. Implementation of SEPA 2012 is the mandate of the Sindh Environmental Protection Agency (Sindh EPA). Sindh EPA is headed by a Director General, and sections are headed by directors, i.e., Director Technical, Director Administration and Finance, and Director Laboratory. Sindh EPA has established District Environment Offices in a few districts.

202. In the past Sindh EPA issued many Environmental Protection Orders to industries for environmental standards compliance. Many textile mills, tanneries, sugar mills etc. in response started cleaner production and wastewater treatment activities. Sindh EPA issued notices to Karachi Port Trust based on public complaints against coal dust pollution. In the last 15 years almost all the multinational industries have installed treatment plants under the enforcement campaign of the Sindh EPA

4.4.2 Environment Section in Planning & Development Department-Sindh

203. Environmental Section in Planning & Development Sindh Directorate works under Additional Chief Secretary-Development. It is headed by Senior Chief-Environment. Sindh Planning & Development Department in collaboration with the technical assistance of IUCN-Pakistan prepared its Sindh State of the Environment Report and Development 2004, and Sindh Strategy for Sustainable Development in 2007. Major functions of the Environmental Section are: appraisal and processing of environment sector development schemes, preparation of environmental plans, and contributions in policy both at the Provincial and Federal levels.

4.4.3 Karachi Metropolitan Corporation (KMC)

204. Karachi Metropolitan Corporation (KMC) is a public corporation and governing body to provide municipal services in Karachi. The key functions include planning, development and maintenance of 28 main roads in Karachi, bridges and storm water drains. The SLGA 2013 allows KMC to collect the fire tax, drainage tax, market fee, tolls on roads and bridges owned

and maintained by KMC, entertainment tax, drainage tax, charged parking on roads maintained by KMC, and the fee on licenses.

205. KMC is responsible for the collection, conveyance and disposal of storm water, and for maintenance and channelization of major storm water infrastructure within the City. The director of solid waste management in KMC has the responsibility for supervising the existing designated dump sites of KMC. KMC is also responsible for providing transportation support to the DMCs for solid waste collection all over the City. For this purpose, KMC provides trucks, tractors, and dumpers to DMCs. KMC also look after the maintenance and repairs of all transportation vehicles.

4.4.4 District Municipal Corporations (DMCs)

206. Karachi is divided into six districts, each of which has a District Municipal Corporation (DMC), which are headed by Chairmen and Deputy Chairmen. Each district is further divided into Union Committees (UCs) which are headed by Chairmen and vice chairmen. Each Union committee is further sub divided into four wards. The Local government elections directly elect the UC chairmen/vice chairmen panel and the 4 ward members of each UC. The chairman of a Union committee belongs to the City Council/KMC and elects the Mayor/deputy mayor, while the Vice Chairman of Union Committee elects the chairman/Vice chairman of DMC and works in District municipal corporation office.

207. The Sindh government transferred the functions of secondary roads, street lights, parks, basic health, education and local taxes from the KMC to the six DMCs in the city. DMCs are responsible for the associated roadside drainage totaling about 176 Km in length. Other roads are the responsibility of the town councils. DMCs have also the responsibility to maintain proper garbage and sewerage systems to keep the city clean and ensure environmental safety.

4.4.5 District Council, Karachi

208. District Council (DC) Karachi is established under Sindh Local Government Amendment Act, 2015 of SLGA Act, 2013 which comprises 38 Union Councils in its jurisdiction. There are 57 Legislative Council members including reserve seats. DC is spread over approximately 70 % area 2,89764 square Km area of Karachi division the most of which is remote area with population of 1.14 million as per Population Census 2017.

209. The Sindh Local Government Ordinance, 2001 de-notified all the councils and notified towns, therefore the area under the DC was integrated to the urban area of Karachi, which after 2010 under the mandate of revived system of 1979 was declared as rural area. Although the area under DC is roughly 70% area of Karachi, however, in terms of administrative jurisdiction the area is restricted to one after subtracting the area under Kirthar National Park, Pakistan Steel Mills, Bin Qasim, Bin Qasim Industrial Park, Malir Development Authority, land of National Highways Authority and Board of Revenue.

210. Baharia Town, DHA Phase-9, Steel Town (Gulshan e Hadeed) and some of other areas of the DC are Urban and expanding rapidly, but in official record these areas have been classified as rural, therefore the rate of property applied for sale and purchase of property are of rural areas. Large area of DC's area is rural, comprising of slums, and small villages. The

1. [64] This figure will be confirmed by the DC office.

share of Sindhis and Baloch in the total population is higher compared to other ethnic groups. In some pockets Pashtuns concentration is also significant. DC is the largest local council as compared to the other local councils/DMCs of Karachi. It touches with the boundaries of District Jamshoro in East-North and Balochistan in West. The most rural area is geologically characterized as hilly, barren and barani (rain-fed agriculture area) as well as sea side. The common profession of the residents of DC are agriculture, poultry, dairy, cattle farming and fishing. The institutional setup of DC is like that of DMCs with some modifications i.e. Chief officer instead of Municipal Commissioner, District Engineer for Superintendent Engineer.

211. The DC has a total of 2,613 employees out of which 1,533 (58.7%) are permanent and 1,080 (41.3%) are contractual. The employees of DC from Sindh Council Unified Grade (SCUG) are 42 whereas non-SCUG employees are 2,571. The elected council of DC is of 57 members. Council has 13 women members which accounts for 22.5% of the total members of elected council.

Table 11: Elected Council of the District Council

Chairman	Vice Chairman	General Members	Reserved Seats				Total
			Women Members	Youth Members	Labour/ Peasant Members	Non-Muslim	
1	1	38	13	2	2	2	57
		67%	22.5%	3.5%	3.5%	3.5%	100 %

Source: Office of the District Council, Karachi

212. Female representation in District Council's employees is not significant. Very few females are employed in General Administration Department, Industrial Homes, Medical Department and Community Centers.

213. The Social Welfare Department (SWD) of the DC is running three different programs, (a) community centers, (b) small industrial homes for women (c) promotion of sports. The small industrial homes aim to empower women by imparting necessary skills for sewing and embroidery work. These training programs are of short duration and after completion of the program a woman does not necessarily need much financial capital.

214. There is a formal mechanism of registration of grievances and complaints. Citizens of DC directly submit a written complaint to the office of Chairman which is then marked or forwarded to relevant department or concerned official for further action.

215. The Engineering Department of the council run, operate and execute all development schemes and work out of entire development budget. The usual practice of allocation of budget is block allocation, under various heads of accounts at the beginning of the year. The budgetary heads of expenditures are communication, sewerage system, public toilet, street lights, solid waste, plantation, purchase of tractor etc.

4.4.6 Sindh Solid Waste Management Board (SSWMB)

216. GoS has established Sindh Solid Waste Management Board (SSWMB) under the Sindh Solid Waste Management Board Act 2014. SSWMB is responsible for the collection and disposal of solid and other wastes in the Province of Sindh. Some of the key functions of SSWMB are: (i) collect and charge fees or impose fines for collection and disposal of solid waste against the rules prescribed; (ii) construct, improve, maintain the buildings, sites and

machinery relating to the operation of solid waste management; (iii) make rules and regulations for operational, administrative, human resource management and finance for regulating the operation of solid waste management from time to time; (iv) review the existing schemes or prepare new schemes relating to solid waste management and undertake execution; and (v) regulate control or inspect the source points of generation, accumulation, transfer, recycling, trading of the solid waste; (vi) employ third party to take over management of solid waste on behalf of the Board.

4.5 Applicable World Bank Safeguard Policies

217. The World Bank's Operational Policies (WB/OP) address the social risks and harms that may derive from WB financed projects in order to avoid actions with undesirable effects for the social stakeholders participating in the Project, or rather create tools for these to be mitigated promptly. The World Bank's social safeguard policies are summarized below.

4.5.1 Environmental Assessment (OP 4.01)

218. The OP 4.01 requires among others that screening for potential impacts is carried out early, in order to determine the level of IA to assess and mitigate potential adverse impacts. The IA ensures that appropriate levels of social assessment are carried out as part of the project design, including public consultation process, especially for Category A and B projects. The OP 4.01 is applicable to all components of Banks financed projects, even for co-financed components.

4.5.2 Involuntary Resettlement (OP/BP 4.12)

219. The policy of involuntary resettlement is intended to assist project affected people (PAPs) arising from developing projects, in order not to impoverish any affected people within the area of influence of projects. The World Bank's safeguards policy on involuntary resettlement, OP 4.12, is to be complied with where involuntary resettlement, impacts on livelihoods and assets, acquisition of land or restrictions to natural resources may take place as a result of the project. It includes requirements that:

- Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.
- Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development projects, providing sufficient investment resources to enable persons displaced by the project to share in project benefits.
- Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement projects.
- Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

220. For subproject activities that impact people and livelihoods in this way, IA will comply with the requirements of the disclosed RPF appended in this SMF:

- examines the project's potential negative and positive social impacts
- Recommends measures to prevent, minimize, mitigate, or compensate for adverse impacts
- Recommends measures to improve social performance.

4.5.3 Indigenous People (OP 4.10)

221. For purposes of this policy, the term "Indigenous Peoples" is used in a generic sense to refer to a distinct, vulnerable, social and cultural group possessing the following characteristics in varying degrees:[65]

- self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
- collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and
- an indigenous language, often different from the official language of the country or region.

222. This policy has defined Indigenous Peoples for policy application as well as the planning process to be followed if a Bank-funded project affects Indigenous Peoples.

223. There are no known indigenous groups in the project area as identified under OP4.10. Therefore, this OP is not triggered. The only identified indigenous people are in Kalash valley in the northern Pakistan (Chitral district of Khyber Pakhtunkhwa province), as a result of Bank screening exercise done in the past.

4.5.4 Physical Cultural Resources (OP 4.11)

224. The policy is premised on the Bank assisting IA to avoid or mitigate adverse impacts on physical cultural resources from development projects that it finances. The impacts on physical cultural resources resulting from project activities, including mitigation measures, may not contravene either the borrower's national legislation, or its obligations under relevant international environmental treaties and agreements.

225. The World Bank's general policy regarding cultural properties is to assist in their preservation, and to seek to avoid their elimination. The specific aspects of the Policy are given below. [66]

- The Bank normally declines to finance projects that will significantly damage non-replicable cultural property and will assist only those projects that are sited or designed so as to prevent such damage.
- The Bank will assist in the protection and enhancement of cultural properties encountered in Bank-financed projects, rather than leaving that protection to chance.

[65] Excerpts from the OP 4.10, WB Operational Manual. July 2005.

[66] Excerpts from the WB Operational Manual. September 1986.

In some cases, the project is best relocated in order that sites and structures can be preserved, studied, and restored intact in situ. In other cases, structures can be relocated, preserved, studied, and restored on alternate sites. Often, scientific study, selective salvage, and museum preservation before destruction is all that is necessary. Most such projects should include the training and strengthening of institutions entrusted with safeguarding a nation's cultural patrimony. Such activities should be directly included in the scope of the project, rather than being postponed for some possible future action, and the costs are to be internalized in computing overall project costs.

- This policy pertains to any project in which the Bank is involved, irrespective of whether the Bank is itself financing the part of the project that may affect cultural property.

226. Since the subproject activities will involve mostly in rehabilitation of the existing water and sanitation works, it is unlikely that any sites of cultural, archeological, historical, or religious significance will be affected. However, in case of discovery of any such sites or artifacts during the project implementation, the work will be stopped at that site and the provisions of this Policy will be followed. Additionally, the provincial and federal archeological departments will be notified immediately, and their advice sought before resumption of the construction activities at such sites.

4.5.5 Gender Policy (OP 4.20)

227. This Operational Policy statement was revised in March 2012 to ensure consistency with the requirements of OP/BP 9.00. The World Bank's Gender Policy aims to assist member countries to reduce poverty and enhance economic growth, human well-being, and development effectiveness by addressing the gender disparities and inequalities that are barriers to development, and by assisting member countries in formulating and implementing their gender and development goals.

228. To this end, the Bank periodically assesses the gender dimensions of development within and across sectors in the countries in which it has an active assistance program. The Bank's Country Assistance Strategy draws on and discusses the findings of the gender assessment. The Bank's assistance to the country incorporates measures designed to address this need. Projects in these sectors and thematic areas are designed to adequately take into account the gender implications of the project. The Bank regularly monitors the implementation of this policy.

4.5.6 Word Bank Policy on Access to Information (2010)

229. This policy sets out the Bank's requirements for disclosing and sharing information. The policy reaffirms the Bank's commitment to transparency and accountability in its activities for promoting development effectiveness and poverty reduction. SMF and its executive summary will be disclosed at KMC website and World Bank Info Shop in addition to sharing them with the stakeholders including the local community.

230. At the same time, the policy strikes a balance between maximum access to information and respect for the confidentiality of information pertaining to its clients, shareholders, employees and other parties. Recognizing that the sensitivity of some information declines

over time, the policy provides for the eventual declassification and disclosure of restricted information over a period of 5, 10 or 20 years, depending upon information type.

231. The World Bank recognizes that transparency and accountability are essential to building and maintaining public dialogue and increasing public awareness about the Bank's development role and mission. It is also critical for enhancing good governance, accountability, and development effectiveness. Openness promotes engagement with stakeholders, which, in turn, improves the design and implementation of projects and policies, and strengthens development outcomes. It facilitates public oversight of Bank-supported operations during their preparation and implementation, which not only assists in exposing potential wrongdoing and corruption, but also enhances the possibility that problems will be identified and addressed early on[67].

4.5.7 Environmental Health and Safety Guidelines (2007)

232. The World Bank Group Environment, Health, and Safety (EHS) General Guidelines (2007) contain performance levels and measures for development of industrial projects that are considered to be achievable in new facilities at reasonable costs by existing technology.

4.6 Comparison of Key LAA, WB Policy and Gap Filling

233. While Pakistan law provides for land acquisition, the regulations and rules are not very explicit regarding the resettlement and rehabilitation of Project Affected People (PAP). The World Bank OPs, on the other hand, are more comprehensive. **Table 12** presents comparison between WB OP 4.12 policy principles of key LAR aspects and LAA (1894).

Table 12: Comparison of Pakistan's LAA and the WB Involuntary Resettlement Policy

WB Involuntary Resettlement Policy OP 4.12	Pakistan 1894 Land Acquisition Act	Proposed Gaps Bridging Measures
Early screening of the project to identify social impacts and risks. Determine the scope of resettlement planning through a survey and/or census of PAPs, including a gender analysis, specifically related to resettlement impacts and risks.	No such condition mentioned for early screening in the LAA.	Project potential social impacts were screened and categorized using a systematic methodological approach.
Carry out meaningful consultations with affected persons, host communities, and concerned nongovernment organizations.	No formal consultation with PAPs and other stakeholders required.	Key stakeholders and PAPs consultation are ensured during planning and design of the project.
Lack of title should not be an excuse for compensation.	Titled land owners or holders of customary rights are only recognized for compensation.	Squatters, informal tenants/leaseholders are entitled to compensation for loss of structures and livelihood and for relocation.

[67] Excerpts from the World Bank Policy on Access to Information. World Bank, July 2010.

WB Involuntary Resettlement Policy OP 4.12	Pakistan 1894 Land Acquisition Act	Proposed Gaps Bridging Measures
Registration is not condition for crop compensation, which is provided according to their shares whether they are registered or not.	Registered landowners and sharecroppers/ lease holders are only eligible for compensation of crop losses.	IA will prepare land acquisition and resettlement plans, as part of project preparation based on an inventory of losses, livelihood restoration measures, Pakistan law and principles enumerated in OP.
Tree losses are compensated according to the market based rates on productive age or wood volume depending on the type of the tree.	Tree losses are compensated on the basis of out dated officially fixed rates by the relevant forest and agriculture departments.	Tree losses will be paid according to the market based rates on productive age or wood volume depending on the type of the tree.
Land valuation is to be based on current replacement (market) value and valued within 1 year before the delivery of compensation.	Land valuation based on the median registered land transfer rate over the previous 3 years before the establishment of Section 4 with an additional payment.	Land valuation is to be based on current replacement (market) value with an additional payment of 15%. The valuation for the acquired housing land and other assets is the full replacement costs keeping in view the fair market values, transaction costs and other applicable payments that may be required.
Valuation of built-up structures is based on replacement value/cost of new construction of the structure. APs can take the salvage material free of cost.	Valuation of structures based on official rates, with depreciation deducted from gross value of the structure and 10 % for salvage material.	As per world Bank policy.
Complaints and grievances are resolved through a multitier GRM and also informally through community participation in the Grievance Redress Committees (GRC), local governments and NGO.	The Revenue Department is the only authority to decide disputes and address complaints regarding quantification and assessment of compensation for the affected lands and other assets.	IA will establish project based GRM and include GRC for complaint resolution.

WB Involuntary Resettlement Policy OP 4.12	Pakistan 1894 Land Acquisition Act	Proposed Gaps Bridging Measures
Information related to quantification and costing of land, structures and other assets, entitlements, and amounts of compensation and financial assistance are to be disclosed to the PAPs prior to project appraisal.	The decisions regarding land acquisition and the amounts of compensations to be paid are published in the official Gazette and notified in convenient places so that the people affected get aware of the same	Findings of census survey regarding all lost assets, compensation amount and Entitlement Matrix will be shared with PAPs prior to subproject appraisal.
WB policy requires rehabilitation for losses, and for expenses incurred by the APs during the relocation process particular attention must be paid to the poor and vulnerable groups.	No provision for income/livelihood rehabilitation measure, allowances for severely affected APs and vulnerable groups, or resettlement expenses.	Provision should be made to pay for resettlement expenses (transportation and transitional allowances), compensate for loss of income, and provide support to vulnerable persons and those severely impacted (considered to be those losing more than 10% of their productive assets).
Requires the establishment of accessible grievance redress mechanisms to receive and facilitate the resolution of PAP's concerns about displacement and other impacts, including compensation.	No convenient grievance redress mechanism except recourse of appeal to formal administrative jurisdiction or the court of law.	IA will establish easily accessible grievance redress mechanism available throughout project implementation that will be widely publicized within respective project area and amongst the PAPs
Disclosure of draft & final RAP to PAPs and on World Bank Website	No requirement for disclosure	Disclosure of RAPs at planning, design and implementation

4.7 Remedial Measures to Bridge the GAPs

234. To reconcile the inconsistencies between the LAA 1894 and WB OP, IA has drafted this SMF that RPF for the CLICK which reconciles Pakistan's legal and regulatory system for LAR (LAA 1894) and WB Safeguards as in OP 4.12, and addresses the gaps between the two systems, the following principles (as mentioned under the project LAR policy below) will be adopted and reflected in the eligibility and entitlements provisions indicated in the RPF on compensation entitlements.

4.8 Compliance Status with Country Laws and World Bank Policies

235. The present compliance status of the project with the Country's Laws/ legislation and World Bank Involuntary Resettlement Policies is summarized in **Table 14** as under:

Table 13: Compliance of GOP Legislation and World Bank OPs

Institution	Legislation / Policy	Actions Taken to Comply
Government of Pakistan	Land Acquisition	SMF and Resettlement Policy Framework (RPF) have been prepared. The SIA/SMPs, PCRMP and RAP/ARAP, will be prepared, if required.
	Information Disclosure[68]	The draft SMF will be disclosed at IA website. Stakeholder's consultations will be held to disclose the draft SMF and feedback will be incorporated and a final draft will be submitted to World Bank for review and input.
World Bank	Early screening and Scoping	Scoping consultations were already held.
	Participatory approach	Consultation meetings and focus group discussions were held in the project area.
	Alternatives	Alternatives considered to be included during the project design.
	Physical and Cultural Resources	PCR Framework and Chance Find Procedures will be included in contract documents.
	Gender	Gender consultations will need to be incorporated while preparing the SIA/SMP, PCRMP and RAP/ARAP field surveys.
	Consultation and Information Disclosure	Stakeholders 'consultative meetings, focus group discussions and formal public consultations were carried out. Public consultations were carried out during the field surveys.

4.9 World Bank Operational Policies relevant to the Project

236. World Bank Operational Policies and their relevance to the Project are briefly described in **Table 15** below.

[68] Under section 4: sub section (1) Whenever it appears to the Collector of the District that land in any locality is needed or is likely to be needed for any public purpose or for a Company, a notification to that effect shall be published in the official Gazette, and the Collector shall cause public notice of the substance of such notification to be given at convenient places in the said locality.

Table 14: World Bank Operational Policies relevant to the Project

World Bank OPs[69]	Policy	Triggered	
		Yes	No
Environmental Assessment	OP/BP 4.01	✓	-
Physical Cultural Resources	OP/BP 4.11	✓	-
Involuntary Resettlement	OP/BP 4.12	✓	-
Access to Information	BP 17.50	✓	-
Indigenous People	OP 4.10	-	✓

4.10 Addressing World Bank Safeguard Policies

237. The project is not anticipated to generate any potential large scale, significant and/or irreversible impacts. None of the project activities will be located in socially sensitive areas, and all the associated impacts can be mitigated with relatively standard mitigation measures. The **Table 16** provides the summary of bank policies and how they relate to CLICK.

Table 15: Summary of Bank Policies and how they relate to CLICK

World Bank Policy	Reasons of Applicability	Addressed by
Involuntary Resettlement OP 4.12	Project may require physical relocation of people and/or private property acquisition (land, commercial, residential and other structures) leading to resettlement.	Preparation of a Resettlement Framework and compensation plan and entitlement policy and updating them in accordance with changes in the Project involving land acquisition. This includes an accessible grievance procedure.
Physical Cultural Resources OP 4.11	Project may pass through culturally significant areas including areas that are an integral part of a people's cultural identity and practices	Avoid through using Chance Find Procedures while selecting the subproject site
Consultation and Information Disclosure	A process of consultation, with stakeholders including PAPs (male and female) including adequate and accessible disclosure of any resettlement information for transparency and social accountability.	Stakeholder Consultation and focus group discussions with both male and female were carried out. Public consultations were carried out during the months of October and November, 2018. Draft and Final SMF, RAPs will be disclosed in KMC website and World Bank Info Shop.

4.11 International Treaties and Conventions

238. Pakistan is a signatory to a number of multilateral environmental and social agreements. These agreements impose requirements and restrictions of varying degrees upon the member countries, in order to meet the objectives of these agreements. However,

[69] World Bank Operational Policies

the implementation mechanism for most of these agreements is weak in Pakistan and institutional setup mostly non-existent. The following are the relevant international treaties and conventions that have been ratified by Pakistan.

4.11.1 Labour

239. ILO Conventions Nos. 29 and 105 (forced and bonded labour), 87 (freedom of association), 98 (right to collective bargaining), 100 and 111 (discrimination), 138 (minimum age), 182 (worst forms of child labour). Guidance materials will elaborate key provisions for implementing requirements related to work standards including nonemployee workers engaged by contractors or other intermediaries to work on Project sites or perform work directly related to the Project's core functions.

240. Pakistan is the signatory to the Convention on the Elimination of Discrimination against Women, as well as the Sustainable Development Goals (SDGs) that have commitments on improving women's socio-economic conditions in the country and promote gender equality. The National Plan of Action and National Policy for Development and Women's Empowerment are consistent with international gender commitments.

241. Legislation against gender-based violence has improved in Pakistan between 2000 and 2016.The government is committed to facilitate the women so that they can play a positive role in the development of the country and special initiatives have been taken to ensure the women Institution responsible for planning, policies and regulations.

4.11.2 Gender and Development

242. In 1998, the National Plan of Action to take forward the 12 points of Beijing was endorsed by the Government of Pakistan. In 2000, the National Commission on the Status of Women (NCSW) graduated from being a committee to a statutory oversight body. In 2002, the national policy for women development and empowerment was formulated, with an emphasis on economic empowerment. GRAP was approved in 2005. More recently, the 2010 labour policy clearly outlines the need to recognize women's labour and increase their labour force participation.

4.11.3 Sustainable Development Goals

243. Pakistan has recently committed to Agenda 2030 and has become signatory to Sustainable Development Goals (SDGs) where Goal 6 calls, among others, for ensuring availability and sustainable management of water and sanitation for all, water use efficiency and integrated water resources management. The SDG 5 on gender equality and women's empowerment emphasizes to ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.

4.11.4 Convention concerning the Protection of the World Cultural and Natural Heritage, 1972

244. The Convention recognizes that the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage and situated on its territory, belongs primarily to that State. It will do all it can to this end, to the utmost of its own resources and, where appropriate, with any international

assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain.

4.11.5 ILO Conventions - Ratifications from Pakistan

245. Pakistan has ratified 08 fundamental and 26 technical ILO conventions in which following are relevant to the project:

- C029 - Forced Labor Convention, 1930 (No. 29)
- C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- C138 - Minimum Age Convention, 1973 (No. 138)
- C001 - Hours of Work (Industry) Convention, 1919 (No.1)
- C029 - Forced Labor Convention, 1930 (No. 29)

246. Article 1 of the convention states that each member undertakes to suppress the use of forced or compulsory labor in all its forms within the shortest possible period. Article 2 of the convention states that the term forced or compulsory labor shall mean all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

5 STAKEHOLDER CONSULTATIONS

5.1 Introduction

247. Meaningful and ongoing engagement with stakeholders is critical to understand local conditions, identify potential issues, and develop relevant mitigation and monitoring plans. The purpose of public consultation is to ensure that the views, interests and concerns of project stakeholders are taken into account in the assessment of the potential impacts of the project as well as in project decisions, particularly in the design of mitigation measures.

248. Stakeholder consultation to support the SMF and the resettlement process, if any, specifically aims to achieve the following objectives to:

- build trust and promote collaboration between the citizens and service providers;
- provide information about the project and its potential impacts to those interested in or affected by the project, and solicit their opinion in that regard;
- manage expectations and streamline misconceptions regarding the Project;
- ensure participation and acceptance of the project by the citizens; and
- Promote the participation of marginalized and excluded groups.

5.2 Stakeholder Identification

249. The potential social issues and risks discussed could be mitigated through identification of stakeholders, including communities that have a stake/interest in the project and those that will be affected by the project activities. However, it is important to ensure that the process of selecting stakeholders is transparent so that all interested parties may participate and that all stakeholders are provided with equal opportunity to engage and contribute to outcomes. Particular attention needs to be given to the inclusion of low-income communities, women and other marginalized groups. Stakeholder groups should be supported to self-select representatives where appropriate.

250. The range of stakeholders involved in Project consultations included the following.

- Communities of low- and middle-income localities
- Civil society organizations (NGOs, community-based organizations);
- Vulnerable groups (women, person with disabilities, youth, etc.);
- Government Departments;
- Service providers
- Academia

251. Stakeholder consultations have been carried out with (i) local communities who will be likely impacted by the subprojects interventions and (ii) institutions that have an important role in enabling the realization of the project interventions. Consultative meetings were also held with staff of the IA to discuss water supply and sewerage related issues from a lead agency perspective. A meeting was also held with the provincial government including Local Govt.

officials to seek clarification on their collaboration with service providers in the implementation arrangements of the project and to clarify on focus in dealing with social impacts of the project.

252. A broader mapping of the key stakeholders was carried out as the basis for the stakeholder analysis undertaken as a part of the SMF preparation. This also entailed an analysis of the differential roles, responsibilities, needs, challenges and expectations of the stakeholders involved is provided in **Appendix 2**.

5.3 Consultations with Communities

5.3.1 Focus Group Discussions with Communities

253. Focus Group Discussions (FGDs) were undertaken to gain community feedback and insights on service provision with respect to water, wastewater, drainage, solid waste management and municipal services. Community perceptions and attitudes regarding availability, access, reliability, quality and use of water and sanitation services costs incurred, willingness to pay; suggestions and feedback on the anticipated social impacts of the proposed subprojects were sought as well as to gauge their level of satisfaction.

254. FGDs were carried with both men and women groups including the elderly, women and children, female headed families and other disadvantaged groups such as people with special needs in selected low-income settlements in Karachi to understand social processes as well as to individual concerns and suggestions particularly those relating to the provision of municipal services. FGDs were conducted with both male and female separately as end users of municipal services with support from a male and female sociologist. The purpose of this exercise was to map out the access, availability and quality of service delivery and implementation challenges on the ground in ensuring equitable and sustainable municipal services. This exercise yielded valuable information, ideas, and insights into existing service delivery capacities and constraints at the local level in providing the services.

255. According to WB Policy, meaningful consultation process should be gender inclusive, responsive and tailored to the needs of disadvantageous and vulnerable groups. In order to meet the criteria of meaningful consultation process, the consultation sessions with key stakeholders were carried out during the month of October and November, 2018. To interact freely and explore the gender related issues, a female sociologist was part of the team. Formal meetings with the females from the affected communities were held to explore their needs, problems and priorities related to the project execution.

256. The specific areas covered in the discussions include access to municipal services clean, solid waste management systems in the community, current situation of drainage system and community perception about services. The aim was to gain a clearer understanding of issues related to municipal services from the perspective of the communities and to ascertain whether or not they were satisfied with the current level of service delivery. In addition, solutions to address the identified gaps were sought in terms of available clean water sources and solid waste management facilities as well as the state of existing drainage system and municipal services in the community.

257. The major concerns raised during the consultations were health and hygiene issues; inadequate water drainage system causing environmental and public health problems; inadequate sewage water service; no or irregular service for solid waste collection at the household level; delays in response and unsatisfactory service attitude; water theft and corrupt

practices; lack of sufficient pressure to supply water in the apartment buildings; and lack of piped water supply and drainage services in *katchi abadis.* The key concerns raised by men, women and institutional stakeholders are summarized below. The detailed consultation findings are provided in **Appendix 3**.

Figure 9: Focus Group Discussions with Communities



Consultation in Korangi



Consultation in Korangi ‘C’ Area



Consultation in Korangi ‘C’ Area



Consultation in Korangi ‘F’ Area



Consultation in Korangi ‘F’ Area



Consultation in Zaman Town, Korangi



Consultation in Zaman Town, Korangi



Consultation in Kameesa Goth, District Central



Consultation in Kameesa Goth, District Central



Consultation in Kameesa Goth, District Central



Consultation in Liaquatabad, District Central



Consultation in People Chowrangi, District Central



Consultation in People Chowrangi, District Central



Consultation in Bilawal Jokhiyo Goth, District East



Consultation in Bilawal Jokhiyo Goth, District East



Consultation in Bilawal Jokhiyo Goth, District East



Consultation in Pahlwan Goth, District East



Consultation in Pahlwan Goth, District East



Consultation in Shanti Nagar, District East



Consultation in Shanti Nagar, District East



Consultation in Ibraheem Hyderi, District Malir



Consultation in Ibraheem Hyderi, District Malir



Consultation in Ibraheem Hyderi, District Malir



Consultation in Qhuldabad, District Malir



Consultation in Qhuldabad, District Malir



Consultation in Rehri Goth, District Malir



Consultation in Rehri Goth, District Malir



Consultation in Bihar Colony, District South



Consultation in Bihar Colony, District South



Consultation in Dhobi Ghat, District South



Consultation in Dhobi Ghat, District South



Consultation in Moosa Lane, District South



Consultation in Moosa Lane, District South



Consultation in Orangi, District West



Consultation in Yusuf Goth, District West



Consultation in Yusuf Goth, District West



Consultation in Yusuf Goth, District West



Consultation in Yusuf Goth, District West

5.3.2 Summary of Concerns Raised by Men

- Inadequate draining system, causing environmental and public health problems;
- Inadequate sewage water disposal service;
- Many toilets are not connected to the municipal sewage network;
- Absence of, or a lack of satisfactory solid waste collection mechanisms;
- Ensuring timely repairs and maintenance;
- Lack of sufficient pressure to supply water to all floors in the apartment buildings;
- Overflow of sewers in the streets due to storm water;
- Need for greater involvement of the public regarding issues related to municipal services, water supply and sewerage;
- Need for regular maintenance of municipal infrastructure and the water supply and sewerage lines;
- Need for strengthening the rule of law and improving transparency to ensure adequate service delivery;
- Provision of good quality and safe sanitary facilities;
- Skepticism about the service delivery in future even with WB assistance due to rampant corruption
- Willing to pay for operation and maintenance once the improved services are available;
- Expecting to get some work in the subprojects as either skilled or unskilled labor; and
- Willing to receive training in plumbing and masonry work.

5.3.3 Summary of Concerns Expressed by Women

- Sewage water mixed with clean/drinking water supply;
- Health concerns for self and children;
- Water borne diseases such as diarrhea, dysentery, eczema etc.;
- Need for reliable and efficient municipal service delivery

5.3.4 Summary of Concerns Expressed by the Institutional Stakeholders

258. Consultation meetings were held with the Board of Revenue, Directorate of Labour and Govt. of Sindh. In addition, the Consultation meetings were held with CSOs especially SHERI, OPP, PILER, HANDS, NOW, Urban Resource Centre, SPO, Aurat Foundation and Shirkat Gah as well as with Academia from Urban Development Departments of NED University and Sir Syed Engineering University of Karachi. The details of consultation findings are provided in **Appendix 4.**

- Inclusive and equitable access to improved piped water supply and other municipal services;

- Federal role is inevitable in bringing powerful stakeholders on the negotiation table that are responsible to ensure equitable resource use;
- Role of various power brokers should be clearly defined;
- Weak capacity of service providers;
- Significant challenges posed by the limited capacity of the service providers;
- Major technical and financial challenges for project implementation;
- People are willing to pay for operation and maintenance once the improved services are available;
- Community involvement is needed through the establishment of user committees;
- Systematic feedback from the users of public services would significantly improve IA performance;
- Participatory identification of infrastructure;
- Inclusive approach with respect to all groups;
- The development process would greatly benefit from social accountability.
- Sufficient allocation of resources for infrastructure maintenance;
- Ensure healthy environment during implementation;



Figure 10: Consultation with Aurat Foundation



Figure 11: Consultation with PILER

5.3.5 SMF Disclosure Public Consultation Meeting

259. LGD organized a public consultation meeting in Karachi following the disclosure of the SMF of CLICK. The meeting was held in the LGD's Committee Room on 3 April 2019. Director, LGD welcomed the participants on the behalf of LCs. Participants from government and, private organizations and academia welcomed the proposed project to be financed by the WB. ESMF consultants gave PowerPoint presentations and highlighted the salient features of ESMF.

260. The SMF Consultant explained the methodology to be used by LCs to identify potential risks associated with the anti-encroachment drive (AED) for sub-projects under the performance-based block grants. He also explained methodology will be used for screening, monitoring and risk mitigation measures that the project will put in place related to anti-encroachment drive. It was further reiterated that that only sub-projects that meet the standards and conditions of the Bank's policy on involuntary resettlement will be financed.

Participants were of the opinion that apart from rehabilitation and repair work new subprojects for construction of roads, underpasses and flyovers should be financed under the CLICK. Participants opined that the CLICK will improve municipal services in Karachi. The list of participants is attached as **Appendix 5.**

6 PROPOSED METHODOLOGICAL FRAMEWORK FOR SUBPROJECT SCREENING

6.1 Overview

261. This Section provides an overview of the methodological steps and procedures for screening and potential safeguard categorization, including typology of subprojects, and instruments required to be prepared for policy compliance and decision making. The Section also describes the operational procedure and the steps necessary in the review and approval of future subprojects under the CLICK.

6.2 Methodology for Social Screening and Categorization

262. The purpose and methodology for the screening process is aimed at determining which activities are likely to result in significant negative social effects, with a view to determine appropriate impact mitigation measures for those activities to ensure sustainability of the subproject. The outcome of the screening process will determine the extent of social considerations required, prior to making a decision for carrying out the activities of the Project related to construction and rehabilitation works.

6.2.1 Social Safeguards Screening

263. Social Screening is the first step in the assessment process. It confirms the need for social assessment or otherwise by appraising the type of subprojects and their associated activities throughout the project lifecycle. All subproject proposals including studies and technical assistance that aim to provide the technical basis for the construction, expansion, upgrade or rehabilitation of social infrastructures, will undergo social screening. This step will take place during the pre-qualification phase of the project cycle.

264. Social screening of a subproject would be on the basis of existing socio-economic data, available reports and site visits to gather data and to formulate an understanding of project activities as to whether it involves PAPs or not. This information — whether a subproject involves PAPs or not — can be ascertained using the information collected through the Social Screening Checklist, verification of assets and losses, and consultations with the community.

265. The Social Screening Checklist provides social features of the sub-project site, basic information on the technical characteristics and the key likely social impacts/risks of the subproject proposal. The information collected through this instrument will be the primary input — as part of the evaluation of eligibility of the proposal from a social point of view – to apply for subproject financing to the WB. The Social Screening Checklist has been provided as **Appendix 6**.

6.2.2 Categorization of the Subproject

266. Categorization is undertaken to reflect the level of review and resources required for addressing social impacts and risks. Each proposed subproject is scrutinized as to its type, location, scale, sensitivity and the magnitude of its potential social impacts. IA screens all subproject activities, including planning support, policy advice, and capacity-building as well as site-specific, physical interventions and procurement. Based on the screening findings, IA categorizes subprojects according to the degree of potential social risks and impacts. In some cases, applicability of specific requirements will need to be determined through additional

scoping, assessment, or management review. The screening process results in one of the following three categories for the proposed Project.

6.2.2.1 Before Appraisal

267. The SMF is based on the following Key policy principles:

- CLICK will not consider any Category "A" subproject. When if more than 200 people are being displaced or losing 10% or more of their productive assets.
- For any category 'B' subproject, an ARAP/SMP will be prepared during implementation and cleared by the Bank before initiating the civil works under the subproject.
- While the nature of investments does not involve large-scale land acquisition and resettlement, some small-scale land acquisition may be required. The subprojects will be executed in a dense urban environment with informal businesses, vendors, hawkers, etc. and may require small-scale resettlement. There may also be livelihood impacts for businesses (e.g. due to temporary restrictions in access during construction) and hawkers and mobile vendors. All proposed operations will be subject to resettlement impact screening. If any resettlement impacts are expected to occur, Resettlement Action Plans/Abbreviated Resettlement Action Plans (RAPs/ARAPs for specific projects will be prepared, in accordance with the RPF provided in this SMF (**Appendix 1**) and approved before initiating the specific projects.

<u>High Social Impacts - Subprojects with Significant Social Impacts</u>

268. CLICK will not consider any Category "A" subproject. When if more than 200 people are being displaced or losing 10% or more of their productive assets.

<u>Moderate Social Impacts - Subprojects with Moderate Social Impacts</u>

269. Subprojects that include activities with potential adverse social risks and impacts, that are limited in scale, can be identified with a reasonable degree of certainty, and can be addressed through application of standard best practices, mitigation measures and stakeholder engagement during subproject implementation. The physical works will comprise small-to moderate-scale water and sanitation projects. Thus, in general, the majority of anticipated impacts and risks would be of minor to moderate significance. This Category may cover the following subprojects:

- The rehabilitation of priority storm water drainage work;
- Improving roads and bridges in selected sub-basin area;
- Parks improvements and solid waste management;

270. Less than 200 people will be physically displaced from housing or lose less than 10% of their productive (income-generating) assets. Moderate Risk subprojects may require preparation of SMP[70] and RAP/ARAP to commensurate with the potential social impacts if identified in the screening process.

[70] SMP can be prepared as standalone or as a part of the consolidated Environmental and Social Management Plan (ESMP).

Low Social Impacts - Subprojects with No Social Impacts

271. A subproject will be considered as having no adverse social impacts when there are no person/persons affected by it. If the sub-project does not require permanent/or temporary land acquisition, and there are no impacts including the loss of land, structures, crops and trees, businesses or income (livelihood). The RAP/ARAP is not required. However, this category of impact may include insignificant/temporary social impacts which are generally mitigated as a part of construction activities in consultation with the PAPs and covered under SMP.

272. Activities that are exempt from detailed social impact assessment under the subprojects to be funded are to increase the capacity of LCs to improve their institutional performance and capacity in areas of investment planning, project execution, financial management, procurement, social and environmental safeguard management, and citizen engagement/accountability in order to enable them to provide improved municipal services.

273. The above screening criteria are consistent with the one included in RPF. Thus, any activities of the Component 1 that may cause significant social impacts will require a comprehensive SIA including type/nature and magnitude of impacts and preparation of RAP, while in case of non-significant impacts, an ARAP and SMP will be required. In case of no impact, the temporary/minor impacts are generally mitigated during the project implementation as a part the contractors' contract. However, it is important that such subprojects are reviewed to ensure that they comply with equity, gender sensitivity, transparency and participation. It is important to consider losses to vulnerable sections of the subproject area and thus, special provisions must be put in place to mitigate such losses.

6.3 Subproject Typology

274. A range of methodologies and/or tools, depending on the potential issues, risks and/or impacts can be used for impact identification and classification. In most cases this typology of a subproject provides an adequate basis for classifying social impacts as a frame of reference and offers a first approximation to the potential social risks posed by a proposal, with Type I subprojects (e.g., storm water drainage works) presenting greater social risks than Type III projects (e.g., street lighting).

275. The appropriate Subproject Type, i.e., (I, II or III) for the proposal under consideration can be highlighted through circling in terms of magnitude and intensity of impacts. In instances in which a proposed project includes more than one component (e.g., the expansion of a storm water drainage work and the concrete lining), circling will highlight the Project Type corresponding to the component that poses the highest risk (in the example given, this would be Type I for the expansion of an existing water treatment plant).

6.3.1 Typology of Storm Water Drainage Subprojects

276. **Table 16** and **17** provide the typology of municipal services subprojects. The list of subprojects provided below under the column "Nature of Project" may be expanded if new kinds of proposals are submitted for consideration to the World Bank. The Project will not consider "Type I" subprojects due to significant LAR impacts.

Table 16: Typology of Storm Water Drainage Subprojects

NATURE OF PROJECT	SCOPE OF WORKS		
	New Construction	Expansion	Rehabilitation
Main Storm water drainage work	Type I	Type I	Type II
Dredging	Type I	Type I	Type II
Tunneling	Type II	Type II	Type III
Concrete lining	Type II	Type II	Type III
Embankment	Type II	Type II	Type III
Associated Roadside drainage	Type I	Type II	Type II

Table 17: Typology of other Investment Subprojects

NATURE OF PROJECT	SCOPE OF WORKS		
	New Construction	Expansion	Rehabilitation
Solid waste landfill	Type I	Type I	Type II
Tertiary and secondary level roads	Type I	Type I	Type II
Primary level culverts and bridges	Type II	Type III	Type III
Parks	Type I	Type II	Type III
Street lighting	Type III	Type III	Type III

6.4 Impact and Social Risks Management

277. IA will assess the subproject proposal and mitigation measures as specified in the agreed safeguards instruments to ensure that: all impacts have been accurately and reliably managed; the subproject design minimizes adverse impacts, and; a cumulative impact analysis is conducted while project alternatives are considered. The subproject alternatives include a '*no sub-project*' option. Only subprojects that are found to be socially viable and meeting the requirements specified in this SMF are to be considered for financing under CLICK.

278. IA will ensure that potential social risks, impacts and opportunities of supported activities are systematically identified and assessed in an integrated manner. The type and scale of assessment and the agreed management measures should be proportionate to the level of social risk.

279. Subprojects with potentially significant adverse risks and impacts, require review and/or assessment of potential social impacts. Risk reduction measures follow a mitigation hierarchy that favors avoidance of potential adverse impacts over minimization and where adverse residual impacts remain, compensation will be provided as a last resort to offset losses to PAPs.

Guiding Principles

- Assess adequacy of the applicable legal framework, and confirm that the Project would not be supported if it contravenes international obligations;
- Enhance positive impacts and avoid, minimize, and/or mitigate adverse impacts through social planning and management;
- Develop a SMP that includes the proposed measures for mitigation, monitoring, an implementation schedule, and cost estimates;
- When uncertainty remains regarding specific Project components or exact locations, develop a SMF in place of a SMP;
- Use independent expertise in the preparation of social impact assessments, where appropriate;
- Examine whether particular individuals and groups may be differentially or disproportionately affected by the Project's potential adverse impacts due to such factors as ethnicity, gender, age, language, disability, sexual orientation, religion, political or social or geographical origin;
- Ensure that the SIA is undertaken as early as possible and in no case shall subproject activities that may cause adverse impacts be carried out until completion of the SIA.
- Ensure that the SIA process and development of SMP involves an iterative and meaningful stakeholder engagement and predicated on timely disclosure of relevant information.

6.5 Social Screening Process and Procedure

280. The section below shows operational procedure and the steps necessary in the review and approval of future subprojects under the CLICK. These steps should be incorporated in any future subproject preparation and approval process.

6.5.1 Step1: Social Screening

281. The social screening process illustrates stages of the social screening which lead to the review and approval of the CLICK activities. Results of the social screening will determine whether or not an individual subproject site qualifies for project financing and if detailed SIA is required. A social screening report will be prepared with all findings and recommendations for further process.

282. The SIA will utilize a planned and inclusive communication and consultation strategy and survey methodology to lay out a detailed socioeconomic survey covering the prevailing status of income, employment, education, age, skills and other socioeconomic aspects along with cultural and community aspects in the areas. The following methodology may be adopted:

- Community/stakeholder consultations at locations with habitations and documentation of such consultations;

- Focus Group Discussions with beneficiaries, key affected persons and their communities;
- Census and socioeconomic survey among the project affected households;
- Assimilation and analysis of data and information to address key issues following SMF;
- The information gathered shall be recorded and computerized, and photographs will be used to document existing structures/land holding and other possible impacts in the corridor of impact;
- Update the final alignment/site on the cadastral maps and finalize the land acquisition plans; and

All data will be disaggregated by gender, age and ethnicity where necessary. A gender analysis will also be undertaken. The SIA will be carried out for each subproject with social safeguards compliance issues in accordance with the civil works schedule.

6.5.2 Step 2: Defining Instruments for Addressing Impacts

283. Based on the screening and categorization process described above, the IA will define the appropriate instruments to plan and implement the mitigation measures for the social impacts. Based on the screening procedures and requirements specified above, the appropriate instruments to address the social issues are as follows:

- Mitigation measures and management of potential social impacts beyond involuntary land acquisition and/or resettlement will be addressed in the SIA/SMP, which will be prepared and implemented in compliance with the requirements specified in this SMF.
- Mitigation measures and management of potential involuntary land acquisition and/or resettlement will be addressed in the RAP/ARP which will be prepared and implemented in compliance with the requirements as specified in the RPF in this SMF.
- Mitigation measures and management of potential impacts on cultural resources will be addressed in PCRMP which will be prepared and implemented in compliance with the requirements as a part of the SIA/SMP in this SMF.

284. The SMF is expected to: cover the unknowns; help in the screening, and; recommend mitigation measures. The screening and review process will determine whether a particular subproject will trigger a safeguard policy, and what mitigation measures will need to be put in place. The screening and review process will also ensure that subprojects that may have potentially significant impacts will require more detailed study and the need for subproject specific SIA and/or SMP.

285. A social screening report will be prepared with all findings and recommendations for further process. Subprojects without social safeguard compliance issues will be considered for detailed preparation and using various instruments for the management of social issues during subproject implementation.

286. The TORs for social instruments are provided as **Appendix 7.**

6.5.2.1 Conducting the Social Impact Assessment (SIA)

287. SIA will be carried out for proposed subprojects when social screening will identify potential social safeguard issues. The principal opportunity of the SIA involves identifying viable alternatives; identifying potential social impacts (including direct/indirect, permanent/temporary, physical/economic); assessing the significance of social impacts; designing least-cost mitigation measures and monitoring requirements; formulating institutional arrangements; and ensuring meaningful public consultation and information disclosure procedures.

6.5.2.2 Preparation of Social Management Plan

288. SMP for the subprojects is intended to ensure efficient social management of the subproject activities. The SMP translates recommended mitigation and monitoring measures into specific actions that will be carried out by the IA. Ideally the SMP should contain the following:

- Summary of the potential impacts of the proposal;
- Description of the recommended mitigation measures;
- Statement of their compliance with relevant standards;
- Allocation of resources and responsibilities for plan implementation;
- Schedule of the actions to be taken;
- Program for monitoring and auditing; and
- Contingency plan when impacts are greater than expected.

289. The SMP should contain commitments that are binding on the IA. It can be translated into project documentation and provide basis for a legal contract that prescribes responsibilities of the IA. In turn, the IA can use the SMP to establish social performance standards and requirements for those carrying out the works or providing supplies. An SMP can also be used to prepare a social management system for the operational phase of the project.

290. The main components of an SMP are described in the **Table 18** below, which is line with the World Bank policies.

Table 18: Components of SMP

Summary of impacts	
Prediction of social impacts	The predicted adverse social impacts for which mitigation is required should be identified and briefly summarized.
Description of mitigation measures	Each mitigation measure should be briefly described with reference to the impact to which it relates and the conditions under which it is required.
Description of monitoring program	The monitoring program should clearly indicate the linkages between impacts identified in the SIA report, measurement indicators, detection limits and definition of thresholds that will signal the need for corrective actions.

Summary of impacts	
Institutional arrangements	Responsibilities for mitigation and monitoring should be clearly defined, including arrangements for co-ordination between the various actors responsible for mitigation.
Implementation schedule and reporting procedures	The timing, frequency and duration of mitigation measure should be specified in an implementation schedule, showing links with overall project implementation. Procedures to provide information on the progress and results of mitigation and monitoring measures should also be clearly specified.
Cost estimates	These should be specified for both the initial investment and recurring expenses for implementing all measures contained in the SMP, integrated into the total project costs, and factored into loan negotiations.

Source: World Bank, 1999

6.5.2.3 Preparation and Implementation of RAP

291. Prior to the preparation of RAP, a screening process will be used to identify potential risks associated with the anti-encroachment drive (AED). The methodology will be used to help screen out sub-projects that may be in areas previously affected by the anti-encroachment drive. The details of the screening process and risk mitigation measures are provided in the RPF, **Section** related to anti-encroachment drive.

292. The steps to be undertaken for the RAP preparation include a screening process as mentioned above, a socio-economic census, lost asset inventory of the subproject area and identification of PAPs. This will be followed by the development of a RAP/ARAP review and approval, implementation of the RAP and monitoring of RAP implementation and its successes. These steps will be the responsibility of the IA in association with provincial government and other relevant institutions. Consequently, the implementation of RAP will be evaluated and documented. Throughout this process, consultation and public disclosure will take place with the PAPs, ensuring that the affected persons are informed about the objectives of the investments and involvement of landowners/affected persons in the programs.

293. Following approval of the ARAP, the process of implementation will take place. This will involve:

- Consultation (a continuation of the process entered into during RAP development process);
- Notification to affected parties;
- Documentation of assets;
- Agreement on compensation; and
- Preparation of contracts, compensation payments and provision of assistance in resettlement.
- Review, Approval and Disclosure of Subproject Information

294. The results and recommendations presented in the social screening forms and the proposed mitigation measures presented in subproject or site-specific SIAs, SMPs and/or RAPs/ARAPs, PCRMP whichever is deemed appropriate, will be reviewed by IA. In compliance with Bank's guidelines and in the national laws and regulations, before a

subproject is approved, the applicable documents (SIA, SMP and/or RAP/ARAP or PCRMP) must be made available for the public, providing sufficient time for review, at a place accessible to local people, (e.g., at IA website, circles and town offices, and in a form, manner, and language they can understand).

6.5.3 Step 3: Review and Approval

295. Review: IA will review the social screening forms and make recommendations as to whether results of the screening process are acceptable. In case an SIA, SMP, RAP/ARAP needs to be undertaken, TORs will be prepared and approved by the IA and WB. The above studies will be undertaken by the consultant hired by IAs in accordance with TORs approved by IA.

296. Approval/Rejection: IA will review the SIA report and will make a final decision on project implementation. If the SIA is approved, SEPA will confirm the SIA has been satisfactorily completed and implementation of proposed subproject may commence.

6.5.4 Step 4: Public Consultations and Disclosure

297. Public consultations will take place during social screening process, and input from the public consultations will be reflected in the design of mitigation and monitoring measures.

- Exhaustive consultation with affected persons and the community as a whole to inform them of the implications of the project on their economic activities.

298. This will involve notification (to publicize the matter to be consulted on), consultation (a two-way flow of information and opinion exchange) as well as participation involving interest groups.

6.5.5 Step 5: Social Monitoring

299. Social monitoring aims at checking effectiveness of mitigation measures. IA will monitor implementation of social mitigation measures based on the contractor‘s work plan on quarterly basis.

6.5.5.1 Step 7: Social Monitoring Indicators

300. The IA will have the overall responsibility for monitoring during the subproject’s implementation. The Bank will closely follow up the implementation of the subprojects, through regular supervision mission during the implementation, and ex-post evaluations. Quarterly progress reports will also be submitted to the Bank for review.

301. The following specific social safeguard performance indicators will be used to monitor social safeguard processes before the award of construction contract.

- Completion of RPF and processes resulting in preparation of full/abbreviated Resettlement Action Plan and, where required;
- Payment of compensation and resettlement assistance, if any, to all subprojects affected in accordance with the Entitlement Matrix prior to initiation of construction activities; and
- The Social Safeguard Process and the preparation of SMPs will be completed before the award of contracts for construction.

302. The subproject screening and review process is provided in **Figure 13**.

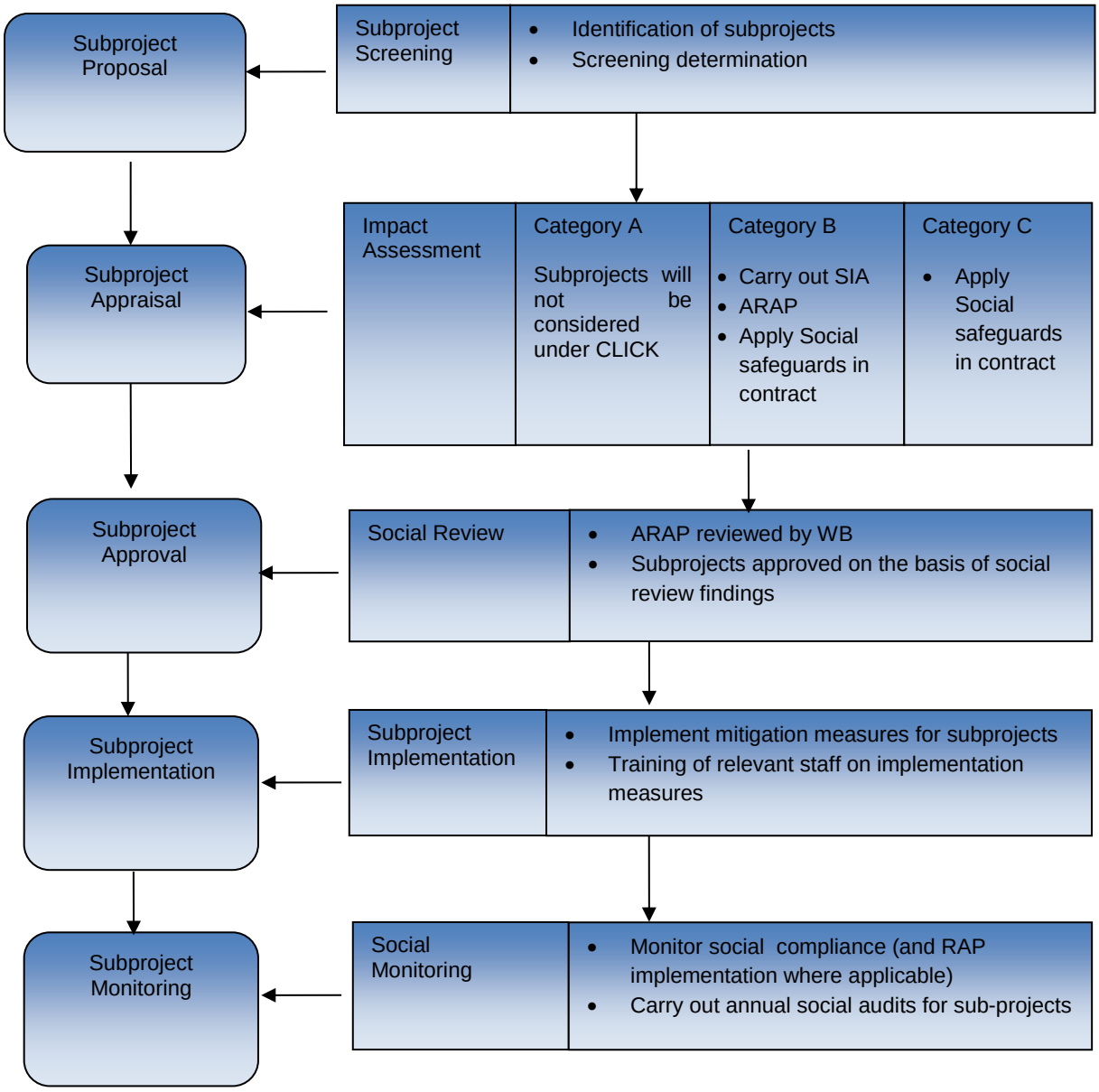


Figure 12: Subprojects Screening and Review Process

6.5.6 Social Screening and its Application

303. IA will utilize social screening procedure to identify potential social risks and opportunities associated with the proposed subprojects. The IA staff will be required to visit the proposed subproject site, interview the stakeholders, and assess the project's impacts in view of their knowledge concerning social risks and concerns in the area. Project staff must consider the nature and location of the subproject and the anticipated impacts, and based on his/her judgment, confirm or propose the best course of action and submit a more detailed project report.

304. All subproject proposals, as well as Category C proposals consisting of capacity development and improvement of the operational performance of IA executing urban infrastructure subprojects, studies related to the development or improvement of infrastructure (e.g., financial management, project implementation, social and environmental management) will not be subject to further Social Screening. This is so because these types of proposals pose negligible or no social risks. However, in case there is a change in the future regarding the types of subprojects eligible for funding by the Project that makes them likely to generate moderate to significant risks, such as for instance the inclusion of funding of certain types of infrastructure, then those types of projects would be subjected to the corresponding steps of the SMF.

6.6 Exclusion Criteria

305. To ensure that the project meets its overall objectives, and that the national legal as well as Bank's safeguard requirements are met, the following will constitute criteria for the exclusion of subproject sites from project finance:

- Category A subprojects, involving large-scale land acquisition and resettlement, will not be considered.
- The subproject would impact mosques, temples, graveyards, and other places/objects that are of religious and cultural significance;
- May significantly restrict access to common property resources and livelihood activities of groups and communities;
- Community agreement cannot be reached on sites and the land is not available through methods adopted in the SMF.
- Subprojects in locations where impacts of the ongoing anti-encroachment drive cannot be mitigated and compensated in accordance with the Bank's safeguards policies.

306. The following **Table 19** provides a Generic SMP to be followed during the design and implementation of the subprojects.

Table 19: Generic Social Management Plan

Sr. No	Activities	Potential Impacts	Mitigation Measures	Timeframe	Institutional Responsibility	
					Implementation	Supervision
A: Design & Preconstruction Stage						
	Project Location: Land Acquisition & R&R Issues	Loss of land/properties and livelihood, shelter due to: land acquisition for development of CLICK subprojects; and on-going anti-encroachment drive	• Screen out sites where mitigation and compensation measures cannot be applied in accordance with Bank safeguards policies (e.g. sites where, as consequence of the on-going anti-encroachment drive, there has been loss of livelihood, forced eviction etc. which cannot be compensated per Bank policy) • Identify appropriate government site to avoid land acquisition and resettlement impacts. • The affected persons/families to be identified in advance and should be compensated at replacement value for the lost asset as per prevailing rules and policy of the GOP and the World Bank • The affected person must be compensated before taking physical possession of the asset. • Any displaced person to be resettled • Loss of livelihood to be compensated monetarily and, wherever possible, in form of alternative livelihood • Any loss of sources of livelihood to be compensated	Design and Pre-Construction Stage	Supervisory Consultants	SSMC/PIU
B: Construction Stage						
	Labour	• Influx of migrant laborer • Additional pressure on the local resources and social infrastructure	• The contractor will preferably engage local labour force except for the laborer requiring special skills and non-availability of such skilled laborers from local area. • Subproject to assess and manage labor influx risk based on risks identified in the SIA. Depending on the risk factors and their		Contractor	SSMC/PIU

Sr. No	Activities	Potential Impacts	Mitigation Measures	Timeframe	Institutional Responsibility	
					Implementation	Supervision
		• Risk of social conflict	level, appropriate site-specific Labor Influx Management Plan and/or a Workers' Camp Management Plan. • Subproject will incorporate social mitigation measures into the civil works contract. The responsibilities for managing these adverse impacts will be clearly reflected as a contractual obligation, with a mechanism for addressing non-compliance. • Additional measures can aim to reduce incentives to engage with the local community by providing workers with the opportunity to spend their time off away from the host community, where feasible with a small transport allowance, ideally allowing workers to regularly return for brief visits to their families, spouses and friends, or to visit nearby urban centers that provide a variety of legal social opportunities. For workers who need to travel further it may be attractive to forego weekends off in exchange for longer breaks that would allow for such home leave travel.			
		Impact on Human health, especially workers working at construction sites (Labour Camps)	• Routine medical checkup of field staff and laborers • Provision of potable drinking water at site. • Provision of proper sewage and waste disposal system. Sanitation facilities have to be provided at the camp sites. • Awareness program on HIV aids and other communicable disease may be provided to the work force. • First aid facilities to be provided at the construction camps. Any case of disease outbreak may be immediately subjected to medical treatment.	Construction stage	Contractor	SMC/PIU

Sr. No	Activities	Potential Impacts	Mitigation Measures	Timeframe	Institutional Responsibility	
					Implementation	Supervision
			• Mosquito repellant to be provided to the labors such as coil and sprays. The camps may maintain cleanliness and hygienic condition. • Proper ventilation may be provided in labour camps. • Use of child labour will be strictly prohibited. • Contractor will maintain a labour register with name, age and sex with supporting document (preferably copy of ID card). This will be monitored by Supervisory consultants and IA. • Provide signage near construction sites and approach roads. • Avoiding Gender Based Violence. Contractor will prepare and implement robust measures to address the risk of gender-based violence that include (i) mandatory and repeated training and awareness raising for the workforce about refraining from unacceptable conduct toward local community members, specifically women; (ii) informing workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted; (iii) Introducing a Worker Code of Conduct as part of the employment contract, and including sanctions for non-compliance (e.g., termination), and (iv) contractors adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence.			
		Impact of labour influx/ migrant workforce	• Provisioning adequate arrangements of drinking water, lighting, ventilation, bedding,		Contractor	SSMC/PIU

Sr. No	Activities	Potential Impacts	Mitigation Measures	Timeframe	Institutional Responsibility	
					Implementation	Supervision
			bathing and other basic facilities in the labour camps; • Ensuring proper health check-ups of all laborers employed at the project site; • Providing separate toilet facilities for men and women at the accommodation as well as site; • Additional measures can aim to reduce incentives to engage with the local community by providing workers with the opportunity to spend their time off away from the host community, where feasible with a small transport allowance, ideally allowing workers to regularly return for brief visits to their families, spouses and friends, or to visit nearby urban centers that provide a variety of legal social opportunities. For workers who need to travel further it may be attractive to forego weekends off in exchange for longer breaks that would allow for such home leave travel.			
	Occupational Health and Safety	Increased accident risks and health hazards	• The Contractor will comply with the requirements of the Environmental, Health, and Safety (EHS), Guidelines of the World Bank, April 2007 and the statutory norms of safety during construction. • The Contractor will provide adequate good quality Personal Protective Equipment's (PPE) to all the workers working at construction zones and Plant sites and will ensure that these PPEs are used by workers at all time during works. • The facility should have firefighting system, Proper ventilation system, first aid facilities. • Provide persons working on the site with appropriate training, equipment and the		Contractor	SSMC/PIU

Sr. No	Activities	Potential Impacts	Mitigation Measures	Timeframe	Institutional Responsibility	
					Implementation	Supervision
			information necessary to ensure their safety. • Unauthorized access should be strictly prohibited. • Emergency contact name and number should be displayed in front of the storage. • Adequate drainage, sanitation and waste disposal will be provided at workplaces. • Proper drainage will be maintained around sites to avoid water logging leading to various diseases. • Adequate sanitation and waste disposal facilities will be provided at construction camps by means of septic tanks, soakage pits etc. • A health care system will be maintained at construction camp for routine checkup of workers and avoidance of spread of any communicable disease. • Readily available First Aid kit bearing all necessary first aid items will be proved at all the work sites and should be regularly maintained. • The Contractor will organize awareness program on HIV aids and sexually transmitted diseases (STDs) for workers on periodic basis.			

7 SOCIAL IMPACTS AND RISK MITIGATION

7.1 Introduction

307. The Section cover social risks and impacts (positive and negative) including those related to gender, inclusion of marginalized and vulnerable groups and communities (elderly, disabled persons etc.), informal sector workers and businesses (hawkers, mobile vendors etc.) and suggests mitigation measures.

7.2 Positive Social Impacts

308. The CLICK project has the potential to bring considerable benefits to the citizens of Karachi within the subproject areas as well as in adjoining settlements. Anticipated benefits include improved storm water drainage, solid waste management, better and safer public spaces, improved roads etc. that would result in enhanced livability including, improved public health status and hygiene conditions, and saved time and energy – particularly for women, children, and marginalized groups.

309. The project is expected to promote and contribute to the overall socioeconomic development in the local areas which would greatly benefit local communities, particularly the vulnerable communities. The significant and long-term main positive social impact arising from the project will be a possible increase in the social economic status of the people living within the selected subproject areas. The rehabilitation of existing storm water drainage and sewerage services, in addition to improved management of solid waste and concomitant improvements in public and environmental health, will spread benefits among all inhabitants of the city, including the poor and especially women for whom protecting their houses and household effects from urban flooding and waste management are among the most critical needs.

7.3 Key Social Issues and Risk Mitigation Measures

310. If the adverse social impacts are not well identified and managed or mitigated during identification, design and implementation of subprojects, the proposed investments for infrastructure improvement can also result in adverse social impacts — further exacerbating the existing social challenges.

311. Since the anticipated impacts of the subprojects are not fully known, the proposed mitigation measures are put in place to assist the IA Agency. In the event that potential

negative impacts do occur, this SMF has remedial mitigation measures in place to address these impacts.

7.4 Scope of LAR and Social Impacts

312. While the detailed scope of all subprojects of the identified components has not yet been defined, it is anticipated that the proposed investment in targeted districts and towns of Karachi will not require any involuntary resettlement or major land acquisition for rehabilitation and improvement work. However, some subprojects under Component 1 may have small-scale land acquisition needs and livelihood impacts, which will be identified and mitigated prior to the implementation of the subprojects. The detailed LAR scope and impact severity for each identified component is given below.

Better Practice Markers

IA will assess the subproject proposal and mitigation measures as specified in the agreed safeguards instruments to ensure that all impacts have been accurately and reliably managed, and the subproject design minimizes adverse impacts while maximizing any positive impacts.

A cumulative impact analysis is conducted while project alternatives are considered. The subproject alternatives include a 'no subproject' option. Only subprojects that are found to be socially viable meeting the requirements specified in this SMF are to be considered for financing under CLICK.

7.4.1 Component 1: Performance-based Grants to Local Councils and Capacity Building

313. The component will support local-level infrastructure and municipal services within respective mandates of the LCs, such as small drainage works, local roads, street lighting and parks among others. However, sites will be screened to ensure that these were not impacted under anti-encroachment drive or people were compensated in accordance with the Bank's policy on involuntary resettlement in conformity with RPF.

314. Some of the above-mentioned activities that are related to rehabilitation and improvement will involve small-scale construction work — all of which will occur within the existing facilities or government owned ROW. For improving drainage, care will be taken to avoid damaging door steps or concrete slabs. Requisite stipulations will need to be included in the bidding documents and contractual agreements with contractors and their compliance will be monitored. Rehabilitation works may require relocation of hawkers and vendors occupying government land/ROW.

315. The rehabilitation of priority areas in the drainage network might involve the provision of secondary and tertiary drains, and connecting them to the main drain to augment the utility of the existing networks. In this regard, standard tertiary drains will be constructed and connected to the main drain for carrying storm water. The rehabilitation and improvement of subprojects identified under this activity will be accommodated within the premises of existing facilities and will not involve any land acquisition or resettlement. The temporary livelihood disruptions for most of the hawkers and vendors will be transient and insignificant. However, some of the vendors who may be permanently displaced will be compensated. The subproject can be classified as impact category B and LAR will not be required, as long as the rehabilitation work is undertaken within the ROW during the design stage.

316. The social scan revealed that parts of drains are often encroached by both residential and commercial structures. The drainage work related subprojects will trigger the involuntary

resettlement safeguard policy and some informal businesses, vendors, hawkers etc. may need to be moved and compensated as per the WB Policy, OP 4.12. The IA will check potential for this trigger and determine: (a) whether land acquisition or access to land will be required; (b) if private land acquisition can be avoided; and (c) if resettlement or land acquisition is required and that it is done according to agreed procedures in compliance with WB OP 4.12.

7.4.2 Component 2: Strengthening Urban Finance – Support for Urban Immovable Property Tax (UIPT)

317. The objective of this component is to improve Karachi's property tax system, which is currently preforming well below its potential in terms of revenue collection. It will finance the following specific activities: (i) All-Karachi property survey and IT database/system for UIPT, covering an estimated 2 million properties; (ii) capacity building of Excise and Taxation Department; and (iii) taxpayer facilitation services. Activities of this component will have no land acquisition and resettlement (LAR) impacts.

7.4.3 Component 3: Improving Economic Competitiveness and Doing Business

318. This component will support the implementation of regulatory reforms and investment in IT systems to improve the business environment in Karachi**.** The component will streamline and integrate core administrative and regulatory processes. It will also build the capacities of local agencies to crowd-in private sector investment in city infrastructure and services, through improving capacity to develop bankable projects. The activities will have no land acquisition and resettlement (LAR) impacts.

7.4.4 Component 4: Technical assistance and institutional strengthening for solid waste management

319. This component will support LGD and the Sindh Solid Waste Management Board (SSWMB) to improve the performance of the SWM sector in Karachi and SSWMB as an institution, through a set of technical assistance activities addressing critical identified challenges, and to contribute to the formulation of a long-term investment strategy. No LAR impact is envisaged under this component.

7.4.5 Mitigation Measures

- Resettlement of the project affected persons will be planned and implemented as an integral part of the subproject itself.
- Meaningful consultation with PAPs and the community as a whole to inform them of the implications of the project on their economic activities;
- Inventory, valuation of, and compensation for lost assets (quantity and type of assets);
- Absence of legal title will not be considered a bar to assistance, especially to the socio-economically vulnerable groups.
- Other assistance measures, if any, necessary to provide opportunities for livelihood restoration for PAPs;

- Vulnerable groups in terms of socioeconomic characteristics of the affected households will be identified and mitigated according to the provisions adopted in this SMF.
- PAPs losing residential and commercial structures including the poor and vulnerable households squatting on public lands, will be assisted with physical relocation and provision of basic amenities like water supply, sanitation, etc.
- Assistance to affected businesses and commercial enterprises;
- Relocation arrangements, if necessary, including transitional support.

320. A Resettlement Policy Framework (RPF) has been prepared in accordance with principles, objectives, procedures and rules set out in the World Bank Operational Policy OP/BP 4.12–Involuntary Resettlement (see **Appendix 1**). Since the nature and precise location/s of potential developments have not been confirmed, this RPF establishes the principles, objectives, procedures and rules to be used in the preparation of resettlement action.

7.4.6 Gender Impacts

321. Women face various gender inequalities and disadvantages in the social context of Karachi which often affect their access to municipal services, water and participation in community-based initiatives. Women are important stakeholders in municipal services rehabilitation subprojects, falling among both the affected and the beneficiaries. It is important to understand the gender dimensions of the project and its differential impacts on women so as to maximize project benefits. Failure to recognize the importance of gender in subproject implementation will have negative social impacts on women. The IA will ensure that the adverse impact on women and children due to the project are minimized or completely eliminated (refer to **Section 9** (Gender Development Framework) for details).

7.4.6.1 Mitigation Measures

322. The socio-economic data gathered will be gender-disaggregated, and the impacts assessment will be carried out separately for men and women. Needs, aspirations and priorities of women will be reported in the subproject RAPs/ARAPs. Female staff will also be hired to collect data and work with women in resettlement activities.

- Women will receive compensation pertaining to the economic activities in their name. Female heads of households will be registered as the recipients of compensation and rehabilitation measures due to their households. Land titles for and usage rights of replacement land will be registered in the name of women, if the land lost to a subproject was legally owned by a woman.
- Women will be included in the participation and consultation process through women meetings and will be encouraged to participate in RAP planning and implementation process.
- Due consideration will be given to complaints and grievances lodged by women PAPs.
- The project will also ensure the inclusion of females as impact enumerators and one female gender specialist in the social safeguard team in the PIU.

- Access for women PAPs to project related employment opportunities, skill-enhancement trainings and provision of alternative livelihoods.
- IA will prepare a Gender Action Plan to mitigate negative impacts based on SIA findings and propose enhancement measures.

7.4.7 Physical Cultural Resources

323. There are a large number of culturally-protected buildings exist in Karachi. These would be investigated as part of the ESIA process and procedures for chance finds of any artifact/site of archeological significance occurs during construction or any contemporary structures and/or places of spiritual and religious importance are put in place.

7.4.7.1 Mitigation Measures

324. The following mitigation measures will be observed:

- Cultural resources uncovered during land clearing will handed to relevant provincial authorities to be preserved;
- Shrines and sacred places that lie in the demarcated area will be appropriately relocated;
- IA will collaborate with relevant provincial authorities in identifying and avoiding damage to cultural sites and resources; and
- Important cultural sites will be marked and fenced during land clearing.

Chance Find Procedure

325. During the constructional phase, cultural/archaeological ‘chance finds’ - sites of cultural significance such as sacred woods or trees or rock outcrops and historical or archaeological heritage/items or sites which the local residents may not have mentioned at the survey stage will be monitored to ensure that such sites or items are properly managed to the satisfaction of both the local communities, the EPA and/or other relevant authorities.

326. The “Chance Finds” procedure will be included in the SMP and will be covered in the contract for civil works, referring to the small areas to be occupied by GK Conduit, water supply and sewer lines. If in case there is any archaeological site in any of the proposed camp sites, measures will be taken to change such a site. In the event that an archaeological resource is discovered during the construction process a Chance Find Procedure such as a rapid archaeological survey will be implemented in sub project corridor and camp site. This procedure needs to be included in the Contractor’s SMP.

327. A Chance Find Procedure is a process that prevents archaeological sites from being disturbed until an assessment by a competent specialist is made and actions consistent with the requirements of OP4.11 are implemented. It is a project-specific procedure that outlines what will happen if previously unknown physical resources are encountered during project construction or operation. The procedure includes record keeping and expert verification procedures, chain of custody instructions for movable finds, and clear criteria for potential temporary work stoppages that could be required for rapid disposition of issues related to the finds.

328. In accordance with this Procedure, work will cease on a site where archaeological material is found. The consulting engineer will inspect and secure the site, and will then contact the monitoring agency for advice and arrange for a survey or salvage work as appropriate.

7.4.8 Community Health and Safety Impacts

329. The construction of the subprojects will have adverse impacts on public health due to dust, noise, pollution, and migration of construction workers into the subproject. The transportation of heavy machine and equipment to the subproject area may cause additional hazards, accidents and human injuries. It is therefore necessary to generate awareness regarding community health and safety in order to protect local communities from hazards or negative health (including flooding, contamination, disease and other natural or human-made hazards). Sub-project related activities may directly, indirectly or cumulatively change community exposure to hazards. A significant concern regarding major development projects is the spread of communicable diseases from the workforce to the surrounding communities.

7.4.8.1 Mitigation Measures

330. IA will ensure the following mitigation measures:

- Ensure an assessment of health risks and potential impacts on the safety of affected communities during the design, construction, operation, and decommissioning of subprojects.
- Establish preventive measures and plans to address them in a manner commensurate with the identified risks and impacts. These measures will favor the prevention or avoidance of risks and impacts over their minimization and reduction.
- Assess potential exposure to both accidental and natural hazards, especially where the structural elements of the subproject are accessible to members of the affected community or where their failure could result in injury to the community.
- Ensure that subprojects avoid or minimize the exacerbation of impacts caused by natural or man-made hazards, such as flooding from the main bulk line as happened in the past that could result from land use changes due to subproject activities. KMC will ensure that subprojects are gender-sensitive and consider how women's and children's health and safety could be particularly at risk.
- IA will ensure collaboration with appropriate and relevant authorities and third parties, in order to be prepared to respond to accidental and emergency situations in an appropriate manner. This preparation will include the identification of areas where accidents and emergency situations may occur, communities and individuals that may be impacted, response procedures, provision of equipment and resources, designation of responsibilities, communication, and periodic training to ensure effective response.
- IA will consider the differential impacts of emergency situations on women and men, the elderly, children, disabled people, and potentially marginalized groups, and strengthen the participation of women in decision-making processes on emergency preparedness and response strategies.
    - Appropriate information about emergency preparedness and response activities, resources, and responsibilities will be disclosed to affected communities.

The emergency preparedness and response activities will be periodically reviewed and revised, as necessary to reflect changing conditions.

7.4.9 Occupational Health & Safety

331. Occupational health and safety refer to protecting workers from accident, injury or illness associated with exposure to hazards encountered in the workplace. The nature of the construction activity during project implementation involved is of general nature, not requiring any specific measures. However, all the necessary safety measures required during the construction of roads, rehabilitation of drainage and installation of mechanical equipment will be observed and maintained as per the standard procedures and requirements.

7.4.9.1 Mitigation Measures

332. IA will ensure that workers are provided with a safe and healthy working environment, taking into account risks inherent to rehabilitation of municipal infrastructure activities and specific classes of hazards in the work areas. Where relevant, IA will ensure that steps are taken to prevent accidents, injury, and disease arising from, associated with, or occurring during the course of work and will ensure the application of preventive and protective measures consistent with international good practice, as reflected in internationally-recognized standards such as the World Bank Group's Environmental, Health, and Safety Guidelines.

7.4.10 HIV/AIDS Prevention and Management

333. To ensure that intensive education is given on the issues of transmission and prevention of HIV/AIDs as recommended by ILO, the IA will work in collaboration with the Health Directorate of the Ministry of Health, Sindh to increase education of workers regarding precautionary measures.

334. IA will ensure that the appropriate tools to collect, analyze and organize the information needed to maintain a safe and healthy working environment are made available and used in the workplace. Highlights of the principles to be followed by workers are set out below, based on ILO and World Bank Group's Environmental, Health, and Safety Guidelines:

7.4.10.1 Mitigation Measures

- Prevention and treatment guidelines on HIV/AIDS for community/workplace will be prepared;
- HIV/AIDS prevention clauses will be incorporated into works contracts;
- There should be no discrimination or stigma against workers on the basis of real or perceived HIV status;
- Refusal of employment or dismissal should not be based on HIV status, nevertheless testing for HIV should be carried out as specified in the code;
- Due care and confidentiality will be exercised in handling information on HIV status of workers bound by the rules of confidentiality set out in existing ILO instrument; and
- Prevention programs on HIV by contractors will include education and information provision, peer counseling, condom use promotion and distribution, and facilitation of voluntary counseling and testing and support for behavioral change.

8 STAKEHOLDER PARTICIPATION AND COMMUNITY ENGAGEMENT FRAMEWORK

8.1 Introduction

335. The SMF requires the formulation of a Stakeholder Engagement Framework to identify and consult with relevant stakeholders in the engagement process. Stakeholder participation plays a major role in identifying the potential impacts of any proposed subproject under CLICK. Citizen consultations assist in the identification of socio-economic and cultural impacts. IA will devise and implement a comprehensive consultation, participation and information disclosure process to ensure that the stakeholders who are directly or indirectly involved in the Project (PAPs, marginalized/vulnerable beneficiary groups, government officials, civil society) are identified as being socially impacted.

8.2 Consultation and Participation

336. Consultation is an ongoing process that: (i) begins in the subproject preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information in manner readily accessible and understandable to affected people; (iii) enables to document and address the concerns of stakeholders; iv) consultation is undertaken in an atmosphere free of intimidation or coercion and is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues; (vi) Consultation is carried out in a manner commensurate with social fabric of the subproject area and the impacts on affected communities.

- The IA will carry out meaningful consultation with PAPs and other concerned stakeholders, including civil society, and facilitate their informed participation;
- Prepare a schedule and frequency for consultation and participation; and
- Ensure consultation early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle.

8.2.1 Approach and Methodology for the Consultation

8.2.1.1 Identification of Subproject Stakeholders

337. IA recognizes stakeholder engagement as an ongoing process that involves the elements of stakeholder analysis and planning, disclosure of information, consultation and participation through the life of the project, a grievance mechanism, and ongoing reporting to the affected communities. The engagement process for the project needs to include and allow for the participation of both directly impacted and indirectly impacted stakeholders and needs to be free of external manipulation and coercion.

338. The main subproject stakeholders identified are PAPs, who reside within the impact corridor of the proposed subprojects. Other stakeholders identified included the service providers, community, corridor, encroachers, CSOs, students, general public and various government departments. All these stakeholders have different types of stakes according to their interests and involvement in various aspects of the subproject.

8.2.1.2 Stakeholder Mapping

339. Stakeholder mapping is a process of examining the relative influence that different individuals and groups have over a subproject as well as the influence of the subproject over them. The purpose of stakeholder mapping is to:

- identify each stakeholder group;
- study their profile and the nature of the stakes;
- understand each group's specific issues, concerns as well as expectations from the subproject and gauge their influence on the subproject;

340. The significance of a stakeholder group is categorized considering the magnitude of impact of the subproject on the stakeholder or degree of influence (power, proximity) of a stakeholder group on the subproject functioning. Stakeholder consultation is carried out during the subproject preparation stage in the form of public meeting, focus group discussion, in-depth interviews and individual consultations. The consultation process will ensure that the likely PAPs, local community and other stakeholders will be informed in advance, and allowed to participate actively and consulted. This serves to reduce the insecurity among PAPs and thereby opposition to the project because of its transparent nature inbuilt in the consultation process.

341. The following approach will be employed to carry out the public consultations process.

- Consultative meetings to be held with the general stakeholders;
- Scoping sessions held with local communities including project affected persons
- Focused group discussions held with project benefices.

8.2.1.3 Consultation Process

342. All stakeholders should know how the consultation process will be conducted and how the outcomes of the consultation will be used, including the rights and responsibilities of the different stakeholders. These terms should be understood and agreed upon by all stakeholders and should include information on the following:

343. Timing – a common understanding of timelines and deadlines should be reached, including the minimum amount of time required to: give advance notice of a planned consultation; carry out self- selection processes to identify suitable representatives (where appropriate); provide any required capacity building in advance of the consultation; and make available key documents that may need to be circulated and reviewed in advance of discussions.

344. Agenda and process for determining consultation outcomes – the agenda of the consultation and how participating stakeholders will contribute to the desired outcomes of the consultation should be stated. If the consultation is to solicit opinions and views, clarify how these will be reviewed and incorporated (e.g., whether participants will be able to comment on future drafts).

345. Representation – decide which stakeholder groups should be represented and the number of representatives that can be accommodated for the purposes of the consultation, noting that self-selection of representatives should be supported (where appropriate). Also clarify what the roles of different representatives are in the context of the consultation's desired

outcome, e.g., if there is a decision-making process as part of the consultation, state which representatives have decision-making authority and which representatives may be acting in an observer capacity only.

8.2.1.4 Analyze and Disseminate Results

346. The findings from every consultation should be analyzed, reported and discussed with representative stakeholder groups. It is important that the data analysis feeds back into the decision-making process. Providing timely feedback is also important to sustain interest in and commitment to the process.

347. On completing a consultation: develop a report or findings; acknowledge key issues raised during consultations and respond as appropriate; and describe how the outcomes of the consultation process will be incorporated into subproject design, In addition, the findings of all the consultations should be disclosed through the agreed upon communication channels.

348. Capacity building – develop a shared understanding of capacity needs and steps that will be taken to build capacity in advance of the consultations.

349. Transparency on outcomes – decide how the outcomes of the consultation will be documented and made publicly available (e.g., IA's website).

8.2.1.5 Information Closure and Dissemination to Stakeholders

350. The IA will identify relevant information to be disclosed during the engagement process throughout the life of the subproject:

- The purpose, nature, and scale of the project;
- The duration of the proposed project activities;
- Any risks and potential impacts on the community and the relevant mitigation measures;
- The proposed stakeholder engagement process; and
- Grievance mechanism.

351. For this purpose the key means of disclosing the information and allowing for a process of feedback and participation has been identified as making non-technical summaries of the social safeguard documents, available in the form of pamphlets and reports at key locations and group meetings and discussions. The copies of the non-technical summaries identified will be made available in the local language at locations suitable to the community, such as at the customer offices, town, district offices. For uneducated people, other suitable communication methods will be used.

8.2.1.6 Monitoring Stakeholder Engagement

352. It is important to monitor stakeholder engagement to ensure that the consultation and disclosure efforts are effective, and in particular that the key stakeholders such as local communities have been meaningfully consulted throughout the process. The monitoring of the stakeholder engagement process will be undertaken on a quarterly basis by the IA. Monitoring stakeholder engagement will include:

- Monitoring the formal and informal consultation activities conducted with the stakeholder groups; Monitoring the effectiveness of the engagement processes in managing impacts and expectations;
- Tracking feedback received from engagement activities;
- Recording and tracking commitments made to communities; and
- Assessing the efficacy of the engagement activities in terms of the desired outcomes.

353. The public participation process involves the following:

- Information dissemination, which informs stakeholders of project activities, potential impacts, and mitigation measures through the life of the project.
- Consultations, which allow the stakeholders to express their views on issues relating to the subproject.
- Participation, which requires shared involvement and responsibilities, and decision-making by agreed upon processes such as mediation and consensus building.

WB Requirements for Public Consultation

Public consultation and disclosure should:

- Be free of external manipulation, interference, coercion or intimidation;
- Be inclusive of all segments of the affected communities (including women, children, the elderly, etc.);
- Be informed by preliminary stakeholder analysis;
- Entail both open (public) community meetings and discussions with community leaders;
- Clearly communicate potential project-related risks and impacts;
- Start during early scoping (especially for projects with significant impacts);
- Be based on timely, relevant, understandable and accessible information – this requires information to be provided in the languages and methods preferred by the affected communities;
- Entail a clear action plan based on the social management plan; and
- Accompany all significant changes to project planning, scope and execution.

8.3 Community Engagement Framework

354. Community participation has different dimensions, and often, community participation is not just the attendance of meetings, but an involvement in a way that empowers community members. Effective community engagement needs to be meaningful to those who are participating. The aim is to develop a framework that will be used to conceptualize community engagement processes at the IA level as part of a community engagement policy. The policy will be to involve the community from passive to more active approaches that also include associated promises related to reaching and involving stakeholders at each specific engagement level.

355. IA should develop a formalized policy on CE guiding principles. It should identify, a) the recognition of the benefits of community engagement, b) its commitment to engagement, and c) the processes to which this policy applies (development of municipal policies, specific

projects, strategies and plans for strategic investments). IA should identify a staff lead (champion) within the KMC that should be responsible for both leading and facilitating community engagement process.

8.3.1 Community Engagement (CE) Principles

356. Community engagement to be followed by IA for the Karachi should be guided by six principles: communication, inclusivity, transparency and accountability, continuous improvement, resources, and engaging partners. These principles represent a strong foundation for how the IA will engage the community. This included an increase in community knowledge about government practices and procedures, having more transparent government process, promoting greater communication/relationship building between the IA and the community, and stronger decision-making, among others.

8.3.1.1 Diversity

357. Barriers to community engagement include anything that prevents a person from fully participating because of his/her age, gender, language, ability, ethnic and religious affiliation and socio-economic status etc., As such, it is critical to determine the most effective best practices how to focus on diversity. IA should develop a formalized diversity strategy, as part of workable model for community engagement and the operationalization of empowerment.

8.3.1.2 Communication

358. The engagement process and each step of its progress will be communicated to participants and the community at large using appropriate methods and technologies. The IA should:

- Provide information that is timely, accurate, objective, easily understood and highly accessible.
- Work with the citizen in a co-operative and collaborative way that includes openness, information sharing and a commitment to feedback and the use of plain language.
- Involve the community as early as possible in the process so that time and opportunity are given for stakeholders to learn about the issue - and so that timely, clear and complete information about the engagement process can be communicated to all stakeholders
- Remind stakeholders that their views and involvement are always welcome and valued.

8.3.1.3 Inclusivity

359. Inclusivity has been identified as a foundational guiding principle, and in order to understand how the subprojects can be more inclusive in their engagement initiatives, IA engagement processes should be based on building trust and relationships within the community. To achieve this, IA should:

- Develop specific strategies for effective communication and consultation and building stronger links with those members of the community that are often not engaged.
- Foster respect for the diverse values, interests and knowledge of those involved.
- Encourage participation by those who will be affected by the CLICK.

8.3.1.4 Transparency and Accountability

360. The IA should be transparent and accountable for acting in accordance with its "Commitment to the Community" and should demonstrate that results and outcomes are consistent with the promises that it makes. The IA should:

- Make citizens clear about the reasons why they are being involved, what is expected of them and the range of outcomes of their involvement will produce;
- Provide with feedback as to the results of the process and how their input influences the decisions as they are made;
- Evaluate engagement processes and measure outcome;
- Continue to seek better ways of engaging the citizens at large about complex issues;
- Share ideas, techniques, knowledge and experience about community engagement across the organization, and seek to learn from, the best practices of other organizations and communities.

8.3.1.5 Resources

361. The IA should acknowledge the importance of engaging the citizen and providing adequate staff, time and funding to do so. The IA should:

- Allocate available resources to support effective citizen engagement;
- Train staff to be capable of supporting effective engagement;
- Respect and effectively use stakeholder time and resources;

8.4 Suggested Measures

362. In view of the community engagement principles, IA should take the following measures.

8.4.1 Guidelines/policies on Community Participation

363. IA should develop guidelines/policies on public participation to inform and manage critical engagement with citizens. The guidelines/policies on public participation should clearly articulate the objectives of public participation and the process to be followed during engagement with citizens. During the development of such guidelines/policies, IA should ensure that the views and inputs of stakeholders are solicited.

8.4.2 Institutionalization of Community Participation

364. IA should institutionalize public participation as a service delivery and good governance mechanism. In order to institutionalize public participation, KMC should ensure that public participation function as a Citizen Forum is established and has the necessary financial and human resources to support critical citizen engagement. The Citizens Forum should be able to assist in the process of dealing with issues related with Project. IA should provide technical assistance to the Citizens Forum.

8.4.3 Conduct Citizens Satisfaction Surveys

365. The Citizens Forum should organize citizen satisfaction surveys by preparing a “Citizens Report Card”. IA needs to make use of findings as a measure to gauge the level of citizens’ satisfaction or lack thereof on services it provides. Such findings will pro-actively assist IA to engage with citizens and address their concerns. Through such engagement on the findings of the reports, possible social dissatisfaction with service delivery issues can be averted.

8.4.4 Training of officials involved in public participation

366. There is a need to ensure that officials involved in public participation are adequately trained to be capable of engaging with citizens. IA should ensure that officials acquire the necessary skills — especially in the areas such as community engagement, conflict management, negotiations and understanding community dynamics. Trained officials in public participation will ensure that public participation initiatives in the respective districts are not only led by elected representatives, but are also initiated and led by officials.

9 GENDER DEVELOPMENT FRAMEWORK

9.1 Introduction

367. Municipal urban social services have traditionally been gendered areas of work in Pakistan, which largely fall in the domain of women. However, gender is an important dimension of exclusion and intersects with other factors such as age, class, ethnicity and religion (CSSR, forthcoming) which will impact their engagement with this work. Gender also frames women's agency in terms of mobility and decision-making within the home, in communities and in the wider urban context. Thus, any changes in policy or programs, services and infrastructure are bound to have significant impact on various aspects of women's lives.

9.2 Methodology

368. This report is an assessment of gender-related issues that are salient to urban infrastructure in two low-income settlements in Karachi. The assessment is based on a review of relevant literature, interviews with key informants and discussions with community members, and data gathered during related research by our organization, Collective for Social Science Research (CSSR). This discussion will assess both potential negative and positive gendered impacts of the upcoming CLICK Project, and conclude with recommendations to mitigate risks and enhance the benefits for women.

9.2.1 Literature Review

369. The key conceptual insights were drawn from two recent studies conducted in Karachi. The first is a report produced by Anwar et al (2016) titled Gender and Violence in Urban Pakistan. The second was carried out by Collective for Social Science Research (CSSR, forthcoming) on Public Service Delivery in Informally Planned Settlements of Karachi. The findings of these studies helped develop more specific research questions for the investigation into how infrastructure and urban services affect the way women interact with their surroundings including their household (HH), communities and the wider city. Differences in their interactions in turn become drivers of exclusion and vulnerability for some, and empowerment for others.

370. Anwar et al (2016) make the important argument that gender has profound implications for mobility in urban contexts. Public spaces are understood to be the domain of the 'masculine', with a constant threat of violence driving women (and transgender) to a limited engagement with the public domain. Material scarcities and poor social and physical infrastructures (including weak public transport) further heighten the sense of risk and anxiety in such engagement and reinforce the social norms that restricts women to remain within their homes as much as possible. This study proposes that lack of access to basic services in urban contexts be viewed as a form of 'infrastructural violence, causing livelihood and food insecurities, public health problems, and enhanced vulnerability to environmental hazards -- all of which are more pronounced amongst migrant and minority communities.

371. Urban social services are a core subset of this vulnerability due to its impact upon health and quality of life. Restrictions of women's mobility in urban areas has put men in the key role of ensuring financial transactions for water supply. Anwar et al (2016:106-110) argue these gender roles in water intersect with existing socio-political dynamics and inequality and may drive forms of public and private violence as households contend with shortages,

unpredictability, and the increasingly violent legal economy that surrounds the supply of water. Thus ensuring a water supply becomes intertwined with notions of successful masculinity, and the insecurities around attaining supplies further reinforce gender ideals that 'good' women remain indoors (forcing children instead to collect water). Complicating matters further, the risk of domestic conflict increases with the stress of obtaining water, as women cannot perform their household duties unless men live up to their duty to secure the supply. Research in another urban setting finds that unevenness of water supply between and within neighborhoods can increase domestic abuse and lead to women sacrificing their personal hygiene to accommodate male household members[71].

372. The accessibility of public utility providers to citizens is a key element of ensuring accountability of the public sector, yet research shows this access is mediated by gender and other social inequalities. There are few women staffing the offices of the Karachi Municipal Corporation (KMC) and its district offices, ranging from 7-12 per cent of total employees only[72]. This begs the question as to whether a greater presence of women within these organizations would lead to an improved service that accounts for the gendered differential in access to supply, and also encourage more women to venture into the public domain to make their needs heard to service providers. However, other research reveals that community members in general rarely bother to complain to authorities regarding municipal service delivery issues, depending more on local government representatives, such as union councilors and town nazims, to air their grievances[73]. Yet, even these representatives are more often than not male and inaccessible to women without the mediation of male relatives.

373. These findings corroborate the World Bank's concern globally to make public services more gender inclusive[74]. Its social inclusion framework is based on a recognition that norms and practices related to social services often reinforce gender inequality and other hierarchies. Informal institutions and norms, along with features of class, caste, ethnicity, religion and earnings will impact vulnerability and agency differently during the lifecycle. Hence access to municipal services will change for women depending on their status and position in the lifecycle[75].

374. As CSSR's (forthcoming) research in low-income communities in Karachi demonstrates income level, the number of able-bodied household members and their availability, and household standards all feature in the quantity and quality of social services water consumed. Household members try to adhere to existing social norms of behavior, while at the same time meeting their needs for social services, such that even the very poor families in these communities were connected to some form of municipal services system. However, limitations on mobility of young women to leave home to fetch water (from neighbors and supplies) remained severe. Thus, this research concluded that gender was possibly the most important dimension of exclusion when it comes to service delivery.

[71] Mustafa and Talozi 2018
[72] Dege 2018
[73] World Bank CRC 2010
[74] Das 2017
[75] ibid

9.2.2 Data Collection and Site Selection

375. The assessment relies on both secondary and primary sources for data.[76] Selected data from Multiple Indicator Cluster Survey (MICS) 2015-6 was used to map main water sources and gendered labour patterns around accessing water in various districts of Karachi.

376. At the institutional level, we interviewed key personnel in the implementing organizations. We carried out semi-structured interviews to record their perspectives on service-related issues in potential sites. We also inquired about the gendered implications of the two projects, and the institutional-level capacities of the organizations to minimize attendant gender-related risks and enhance the projects' benefits for women.

377. For community-based insights, we analyzed qualitative data collected for a recent social diagnostics study by CSSR (forthcoming) on public service delivery in informally-planned localities in Karachi. The data was also used to develop checklists for follow-up interviews with individuals and key informants who had already been interviewed for the study. We developed household case studies by synthesizing notes from CSSR's fieldwork in 2017 and the follow-up interviews for this assessment. Group discussions were conducted with women to understand overall norms in the neighborhood. Key informants, such as community leaders and service providers, were also interviewed for their perspectives on the main research themes.

378. The field investigation was inductive and flexible in order to adapt sampling approaches and research instruments as new findings emerged. The initial approaches to checklists for interviews and group discussions, therefore, acted to guide the research but did not entirely determine it. Promising new questions were pursued during fieldwork and alter sampling plans to include individuals and groups that were found to be of particular interest. Observations and informal interactions in the community related to the research questions were also recorded in field notes.

9.2.2.1 Sampling

379. Two districts - Central and East - in Karachi were selected for the community-based qualitative research. A key insight from the data is that norms related to municipal services and gender cannot be generalized for Karachi.[77] Gender norms related to specific areas govern more specific norms with respect to mobility and management of social services. We hypothesize that these norms are likely also affected by issues around water supply and access.

380. The database developed for CSSR (forthcoming) guided the sampling methodology for fieldwork. Selection was based on prior community profiles to ensure coverage of a range of gender-related issues including community access to municipal services, and ethnic diversity. The selection of follow up interviews ensured that perspectives of women of various age groups, ethnicities and religions could be reflected in the gender framework.

<u>Settlement 1: Sachal Goth</u>

[76] We asked for gender-disaggregated data of human resources at the implementing organizations (LCs) to determine participation of males and females in various departments and grades, but it was not received by the time this report was compiled.

[77] MICS 2015-16 is the latest and only publicly available dataset which provides district-level information about water supply and gender disaggregation of collection to understand norms. It is likely that these norms vary even within districts and as we find in prior studies such as CSSR (forthcoming), within neighbourhoods.

381. Sachal Goth is in Karachi's District East. Sachal Goth is predominantly an ethnic Sindhi locality and most of its residents are recent migrants from interior Sindh. We also visited a nearby locality (Ayub Goth) which hosts mainly Punjabi speakers of Christian descent. The two neighborhoods in Sachal Goth were selected to reflect the unequal delivery of social services distribution which were reported in CSSR (forthcoming). The majority of the population works as casual labour. There are some people who have private jobs in factories. A Basic Health Unit (BHU) is located in Block F of the neighborhood. There are two government schools and two private schools located nearby. People in the area have access to a park and a shopping mall located 4 km from the neighborhood. The key informants did not know of any LCs complaint center nearby.

382. Key informants told us the existing service infrastructure was not designed for the rapid growth of new settlements. New road construction had damaged existing conduits and mains. The main water line (Karachi University) was old and damaged through these processes, and encroaching tree roots. As a result, the main roads and streets around schools were filled with overflowing drain water. The old sewerage line needs regular cleaning which is costly.

Settlement 2: Kausar Niazi Colony (KNC)

383. Kausar Niazi Colony is located in District Central. The Colony is situated along the banks of an old riverbed called the Gujjar Nala which flows from the north of Karachi into central Karachi. The main ethnic groups residing in this area were reportedly Pashtuns (40%), Sindhis and Punjabis (30%) and Hindko (30%). Many of the Punjabi residents are Christians who were or still are employed as sanitary workers. Other kinds of employment found in the neighbourhood were casual or day labour, with some working in private jobs.

384. The neighborhood was selected due to the presence of ethnic and religious diversity, as well as the risk of frequent storm-water flooding due to proximity to the Gujjar Nala. An official at an implementing organization cited this as an important issue which CLICK seeks to address.

9.2.3 Complaints

385. Respondents in Sachal Goth had a strongly gendered set of norms around complaints with respect to service provision. Although residents enjoy some access to elected councilors and representatives, those from informal settlements are inevitably pushed to the end of the queue while those from mainstream settlements are favored. Once during the month of Ramzan the men from the neighborhood went in a group to complain to the authorities about lack of sufficient word. Women complained that men don't know how to create an effective commotion, they 'just quietly go away.' In contrast, 'women can make noise, women are more useful than men, but the men don't understand this.' According to one respondent:

> *After all women know how to go door to door to galvanize crowds for political demonstrations. We've been saying women should be in the committee … but this one [member] was saying why should we go around with women?*
> - Female resident, age unknown, Sachal Goth[78]

386. Many women however, seemed unaware of the complaints procedure and expressed doubt that even if they were to file complaints, nothing would come of it. Thus, they are reluctant to waste their time standing in line in offices. Some women expressed that they would visit and call complaints centers public services if they had better sense of where the office

[78] HH interview, Sachal Goth, 21 December 2018

was located and how to access the complaints system. Yet others commented that they had visited Karachi Electric (KE) offices to complain and pay bills because they knew the process and the office was close by.

387. A male Sindhi speaking key informant from Sachal Goth reported that although lack of municipal services were major issues for residents, the KMC lacked capacity to handle their grievances. The old sewage line is regularly blocked due to solid waste and in the absence of effective action by the authorities the locals pooled their resources and formed a street committee to install a new drain pipe. An engineer gave his technical advice and the problem was partially resolved. However, flooding around this street from sewage continues.

388. An official in one implementing organization admitted that a lack of female staff in his office may be one reason why they don't come in for consultations or complaints more often. However he was sure that women do both call and visiting complaint centers. Gendered data on complaints at the KMC Citizen Complaint Information Centre (CCIS) however shows that only 20 per cent of complainants in 2017-18 were female. Out of these only 1 or 2 complainants had visited in person, while the rest had made complaints via phone. This is despite a KMC official's understanding that the female to male staff ratio at the complaints offices was relatively higher than other KMC departments.

9.2.4 Gender Considerations and Institutional Capacity

389. In the implementing agencies, there is reportedly little consideration from women as consumers during the planning of infrastructure development, such as counting of how many will benefit from new developments. An official from KMC acknowledged that flooding takes place every year and they are planning to purchase machines and equipment as a priority to help ease the problem.

390. As noted by Dege (2018), there is clear gap in gender ratios and participation of women across all service providing organizations.[79] The perceived reasons for lower participation in implementing organizations vary amongst male and female employees who we interviewed. Male informants believed that there is a lack of women who opt to participate in these fields. This according to them was due to either lack of women who opt for engineering and related qualifications required to work in the field, or lack of willingness and restrictions on mobility (such as to visit field sites including katchi abadis). Female respondents at implementing organizations believed that there is a poor perception in the general public and particularly women about the environment at public service organizations which needs to be improved. They felt that better and open advertisement or induction of women could improve the female to male ratios.

9.2.5 Mobility and Agency

391. In Sachal Goth, women who worked were engaged as domestic staff and some had jobs in offices. Respondents said the type of occupation was dependent on their ability and willingness to work. However, there were families that refused to allow women to work outside the home. Some women reported being forced to leave their jobs due to commitments at home: "Parveen used to work as a teacher but quit her job four months ago. She had to attend

[79] Gendered data in various departments and grades at KMC, DMCs and LGD has been requested and is pending

to her family when her sister died." Some women were engaged in stitching work from within the home.

392. In KNC women from certain marginalized castes work as maids and may be the sole breadwinners in their families. However, respondents said that Muslim Punjabis did not allow their women to work. Muslims from other ethnic groups also do not allow their women to leave the home for work. According to one group of Muslim women, "The Kashmiri people do not allow the women to leave their house for water or for work."[80] While women in general are usually not involved in negotiating conflict over issues that arise in the neighborhood, whenever they carry out work to improve their colony, all residents, including women, mobilize to collect funds and organize the work.

393. For recreational purposes, female respondents reported that they would go to parks in the area with children if they were nearby. Once a month, many respondents reported that they visit large parks outside the neighborhood with the entire family. In both areas, women were allowed to go to a nearby weekly market in groups. They generally avoided going to shops in the area. In both areas, it was socially acceptable for young girls to visit neighbors at close distances and walk to parks and school in groups as "everyone knew each other so the area is safe".[81]

394. There were also examples of emergence of female leadership in both areas we visited. Two such women were our key resource persons, and one of whom has been an elected councilor. Women in the neighborhood trusted them to carry their voices to authorities responsible for public utilities, help them resister with Benazir Income Support Program (BISP), and in some cases called them to mediate domestic conflicts between women.

9.2.6 Resettlement

395. The subprojects have yet to be finalized, however the prevalence of 'encroachments', or informal settlement poses a challenge. While an Social Impact Assessment is mandatory for each subject, the process doesn't engage women because, as one official told us, they either never leave their homes or else are 'always' out of their homes due to jobs.

396. The lack of information about proposed projects is a source of stress and insecurity. Women reported there are many rumors about planned projects and anti-encroachments which make them insecure about their future. They recalled stories of the recent anti-encroachment drive around Gujjar Nala which resulted in many people losing parts of or their entire homes. They mentioned that unreliable information from various stakeholders is floated in the communities from times to time about future projects that might lead to a further loss of homes and livelihoods.

9.3 Discussion

397. The rapid assessment findings corroborate the recent literature in terms of highlighting the structural and social inequalities that make women deeply vulnerable to problems associated with water and sewage utilities[82]. Findings also corroborate research which reveals that the absence of women amongst service providers further alienates women users from

[80] HH interview, KNC, 30 December 2018

[82] Anwar 2016, Mustafa and Talozi 2018, Das 2017

utilities and disempowers them as citizens[83]. The selection of field sites cast a focussed lens upon the ways in which caste, class, ethnicity and gender intersect to unevenly impact the vulnerabilities of women differently within settlements.

398. Women's mobility and agency with respect to utilities is framed by broader norms that govern their lives. For example, in Sachal Goth women and children have little or no recreational spaces to go to, and mentioned a nearby park used to exist but had been turned into a bazaar. However, mobility for shopping and social visits is more sanctioned. In KNC mobility restrictions for women are greater in Pashtun and Hazara households, while Punjabi speaking Christians and other Seriaki and Punjabi Muslim households have more relaxed norms. Women are allowed to leave home for their domestic work, vending, shopping and visiting the tailor. In both sites, however, gendered norms discouraged women from interacting with public sector utility providers, even though enhancing their voices as citizens could have a positive impact on the quality of service provision. Yet, there are small examples of informal leaders and informal networks between women whose influence may be leveraged to better access women in these communities. Male-dominance in these sectors is evident in both formal and informal provision of public-sector service delivery, which is a potential reason for women's lack of voice and representation in resolution of issues which greatly impact them.

399. Meanwhile, much of their domestic work is shaped by erratic access to piped water, with women spending hours waiting for it, unable to plan their time and even more restricted in their ability to exit the home. Wealthier families have an advantage of using suction pumps which further deprives the poorer homes from adequate supply and becomes a source of conflict. (While our study did not find high levels of dispute or conflict, both within communities and within homes, due to problems with utility provision, the rapid assessment framework did not allow for the kind of probing which may have revealed gender-based domestic violence beyond beating children.

400. **Mobility and other indicators (age, ethnicity, status) impact women's access** and in both cases women and socially disadvantaged groups are deprived of equal access. All engagement in the public domain is highly gendered, with women from lowest income-group most dependent on public sector utility provision because they lack market access. Thus, women's voices are not heard even in fora meant to engage the government with citizens' groups in order to hear their grievances and discuss solutions. If women's lives are directly impacted through the absence of functioning services, it is essential their voices be heard in framing solutions.

401. **Women's voice in infrastructure arrangements for service provision in households and the community is hardly heard**. On the one hand norms prevent them from interacting directly with public service providers. On the other, within their own households they lack effective voice to communicate their needs effectively to men. Men did not take them seriously or include them in the committee meetings, even though women are interested in joining these fora. When Union Council members visit their homes, women are not allowed to open doors in the absence of male relatives. Many women seemed unaware of the complaints procedure and expressed doubt that even if they were to file complaints, nothing would come of it.

402. Formal and informal service provides have a limited sense of the gendered impacts of up gradation subprojects to improve infrastructure and services. Implementing agencies give

[83] World Bank CRC 2010

little consideration to women as consumers during the planning of infrastructure development, such as counting how many will benefit from new developments. There seem to be no procedures or data collection methods to ensure gender-aggregated data. Whereas, there are plans to conduct consultations with women from the communities where the project will be implemented, there is not enough female representation within implementing organizations to ensure mobilization and proper communication with women in low-income communities.

403. Moreover, there are currently no policies in place for mainstreaming gender in public service organizations such as LCs. The report also found that female employees also face difficulty in communicating issues to senior staff.

404. The informal nature of these settlements weakens the residents' ability to make demands of the state and deepens their vulnerability to anti-encroachment drives. The gendered nature of the formal complaint system, as highlighted by the relatively fewer number of women employees in relevant offices and the smaller proportion of women amongst complainants, further reinforces gendered norms and discourage women from making forays into the public domain to demand better services. The dependence on male mediation, whether to purchase water or to file complaints with utility providers, disempowers women as citizens and deprives them of agency.

9.4 Impacts and Action Points

405. The above findings and discussion that emerged from the literature review, key informant interviews, and the community-based research, provide a basis to understand the potential impacts of CLICK. The Project focus on improving infrastructure and public service delivery in Karachi via public sector organization. It is likely that it will interact with the issues and themes described above, to produce positive and negative effects.

406. **Table 20** below lists the main gender-related issues, related risks - in general and through the two projects. It also suggests mitigation measures to alleviate these risks and enhance the benefits through the two projects[84].

Table 20: Potential Risks and Mitigation Measures

Issue	Risks/Impacts	Mitigation Measures
Community-based		
Dislocation is a source of stress and insecurities	Dislocation and lack of appropriate resettlement may make women vulnerable to violence and other issues	Gender-sensitivity in Resettlement Action Plan
Women are unaware of formal grievance redress or complaints systems/ believe they are unhelpful	Expansion of complaint centers will not result in increased usage by women. Lack of formal redressal systems lead to informal and male-dominated committees and systems to address public service delivery issues	Information sessions to make women aware of formal complaint procedures or new complaint centers with gender sensitive design (separate queues, female staff etc.)

[84] Gender-based violence (GBV) (with reference to WB Note on GBV available at: http://pubdocs.worldbank.org/en/399881538336159607/Good-Practice-Note-Addressing-Gender-Based-Violence.pdf

Issue	Risks/Impacts	Mitigation Measures
There is a lack of district level data on time use around municipal services that can be used to understand gender norms	Upcoming projects may have a generalized approach to gender norms across Karachi	Invest in collection of gender-disaggregated data at district/community level
Gender-disaggregated HR data is not easily available at implementing organizations	Lack of female representation and understanding of hiring needs. Lack of women in key departments may lead to gender insensitivity in design and implementation of the two projects	Better communication of information Improved outreach by implementing organizations to increase participation of women Gender-sensitive facilities (flexibility/paid leave etc.) Adoption of zero-tolerance for harassment and other gender sensitive policies
Implementing organizations do not have gender considerations or assess household affected persons /users of new infrastructure projects by gender	Design and implementation of subprojects and CLICK may not be gender sensitive	Ensure policies to collect gender disaggregated data on household surveys in risk assessments.
Institution-level Issues		
Consultative processes	There is interest by the IA to conduct consultative community-based processes that include women. However, there are two main risks: The capacity to carry out consultations with females is low at implementing organizations, due to low female participation There is risk of females not attending consultations due to restrictions on mobility	Identify female community leaders/create champions in communities to encourage and increase women's participation in consultation and complaints processes

10 GRIEVANCE REDRESS MECHANISM FRAMEWORK

10.1 Introduction

407. This Section aims to develop a framework of Grievance Redress Mechanism (GRM) that includes procedures, roles and functions to facilitate the due processes of grievance resolution by proposing an effective and prompt grievance response system to be established before the Project implementation. This framework is built on the existing complaint resolution system of LCs and include proposals for how to strengthen and enhance the existing grievance redress mechanisms already in place in the form of a Citizens Complaint and Information System.

408. The purpose of GRM is to provide a forum to the citizens to be able to voice their concerns, queries and issues related with the project. Such a mechanism will allow for trust building amongst the stakeholders and prevent the aggravation of neglected issues into major community unrest. The GRM should be accessible and understandable for all stakeholders in the project and for the entire project life. The GRM will be communicated to all relevant stakeholders and will also be applicable for any contractor that will occupy and/or use land during the construction and operations phase.

409. Methodology involved in developing the GRM framework: Detailed discussions were conducted with the staff of the KMC Complaint Cell to review types of complaints registered, existing processes for grievance handling, redress and complaint closure. Feedback was also sought from community and institutional stakeholders to examine what options exist for putting in place an accessible, affordable and effective grievance redress mechanism for potential issues may arising during the Project implementation.

410. Although the discussion on GRM in this SMF is targeted for social issues, it is not, however, exclusively implemented for this issue but for any issues related to the Project. The GRM covers broader aspects such as technical-related aspects of construction, social issues related to service delivery, subproject construction, social issues that may arise (e.g. resettlement), and any other complaints directed towards the Project.

411. The GRM will include channels to receive complaints on Gender-Based Violence (GBV), procedures on confidential reporting to various service provides and safe and ethical documentation and referral and resolution of GBV cases to existing service providers.

10.2 Rationale for GRM

412. GRM is required to be incorporated at the planning and implementation stages of any activities and physical investment under the Project as per national regulations and World Bank policies. An effective GRM can accelerate the achievement and improve the quality of the Project outcomes. It is important for this Project to strengthen the current GRM system that is already in place at KMC level to better manage complaint-handling and dispute resolution.

10.3 Objectives and Scope of GRM

413. GRM is a tool for early identification, assessment and resolution on any complaints or disputes on the activities and physical investment in this Project. The overall objective of the grievance procedure is to ensure that complaints and grievances from local stakeholders are handled in a systematic and transparent manner in order to promote mutual confidence and

trust during stages of the project development and operation. The specific objectives of the GRM are as follows:

- To allow stakeholders the opportunity to lodge complaints and raise concerns;
- To ensure that comments, responses, and grievances are handled in a fair and transparent manner, in line with the applicable reference framework;
- To mitigate or prevent adverse impacts on communities caused by the Project operations;
- To serve as an early alert system to project management of significant or recurring issues that might signal a systemic problem, and facilitate a resolution; and
- To achieve improved service delivery in municipal services whereby citizens have strong ownerships, participation and get fair benefits from the sustainable utilization of such services.

10.4 Review of the Existing LCs's Citizens Complaint and Information System (CCIS)

414. LCs have their own complaint redress systems and have been able to run an increasingly institutionalized complaints handling and dispute resolution processes aimed to better manage feedback and operational risks. The web-based system of KMC's Complaint Cell is available for citizens in Karachi to lodge their complaints. The facility allows citizens to file complaints pertaining to a range of civic issues like overflowing drains or clogged sewer lines due to mixed storm water lines.

415. The complaint can be lodged though mail, by post, online or through telephone using dedicated lines or online web. In case of unavailability of internet, the citizens are free to send their grievances by Post. There is also a prescribed form which is available online on LCs's websites. The grievance may be written on any plain sheet of paper or an application addressed to the Complaint Cell. The complaints can also be lodged using KMC's 1339 Call Centre facility. The registered complaints are then forwarded to respective service providers.

416. Once the grievance is acknowledged online, a unique registration number is generated that is associated with each grievance for tracking and follow up. LCs are used as utilize post boxes for forwarding complaints to respective service providers. Apart from the Compliant Cells located in the KMC, complaints are lodged in DMCs' central offices through telephone or in writing.

10.5 Types of Citizen Grievances

417. An analysis of registered grievances has revealed that the most frequent complaints received are regarding:

- Non-availability of water supply or intermittent water supply
- Power outage
- Contamination in the water supply lines (mixing up waste water in water supply lines)
- Sewage overflow
- Blocked sewage line

- Absence of tertiary or secondary sewer lines
- Non-availability of manhole cover
- Non-availability of ring slabs
- Absence of field staff like valve men and *Kundi* men (responsible to clear clogged sewers)

10.6 Organizational Systemic Issues

418. The stakeholder consultations and community focus group discussions revealed the following findings with respect to LCs compliant redress systems:

- Lack of awareness among community members about the existence of GRM due to insufficient publicity of the complaint mechanisms;
- The communities contact points for raising complaints are primarily UC chairman (elected representatives), valve men and helpers at pumping stations;
- Lack of outreach for information and communication issues pertaining to timings of water supply to households;
- Inadequate/incorrect explanation such as lack of funds is used as an excuse in response to complaints;
- Absenteeism and lack of accountability of the field staff;
- Delaying tactics used by the field staff;
- Lack of skills for grievances investigations and resolution;
- Failure to recognize quality of care concerns;
- Inordinate delay in taking decisions, extending from several weeks to several months and refusal/inability to act promptly for grievance resolution;
- Apathy/no intention from concerned circle level officials to resolve complaints expeditiously and appropriately in the first instance.

419. During the FDGs, communities expressed frustration and complained that field level staff are insensitive towards their plight and lack work ethics and professionalism. According to the institutional stakeholders, LCs require a paradigm shift in governance and need to adopt a system in which the citizens are consulted at various stages of policy formulation and implementation.

420. Communities complained that the inefficiency of field-level administration, low morale of the servicemen, inherent inertia, lack of proper authority and accountability and political interference are the key causes for inordinate delays in the service provision, which are the major factors that generate grievances. Often, field level officials are found to avoid taking appropriate decisions by resorting to rejection without application of mind, in other worlds, not taking serious interest in solution of the problem.

421. In many cases, the staff puts the onus on lack of funds or on the aggrieved for not paying their utility bills on time. Many a times, the actual cause of grievance lay in internal inefficiency of the system and failure to identify simple systemic solutions. It is also observed that the time norms for providing services were not being adhered to in many cases. There is no doubt that grievances continue to arise because of a high systemic tolerance for delay, poor work quality and lack of oversight in every day performance of functions. The down to line functionaries do not appear to have developed the ability to continually look 'within' and identify any systemic deficiencies. All these factors have warranted that grievances, once arisen, do not get resolved in 'normal' course and need intervention at the highest administrative level.

422. Lack of accountability in efficient functioning at field level has been identified as one of the prime causes for continuing delay in redressal of grievances. Learning from past mistakes and suggesting systemic changes for improvement and course correction are almost missing. In a nutshell, the mechanisms for grievance redress needs improvement as per the mandate and vision of LCs.

Good Practice Markers

- The better method to redress a grievance is not to allow the grievance to arise in the first instance.
- Problems are often resolved more easily, cheaply, and efficiently when they are dealt with early and locally.
- When subproject sites have been identified a consultation and information session will be scheduled with residents to discuss the nature of the project and to note and address any concerns on the subproject development.
- Identify areas susceptible to grievance generation and identify possible opportunity or alternatives.
- If the grievance cannot be avoided, then alternate options should be communicated to the potential aggrieved person.
- Deal with every grievance in a fair, objective and just manner.
- Publicize the GRM and share among stakeholder groups, such as the affected communities and government agencies through engagement meetings through pamphlets and posters.

10.7 Way Forward

423. In this context, there is an urgent need that LCs should provide hassle-free public services to - citizens by focusing on early resolution of grievances rather than being in denial and leaving grievances pending. In order to achieve this objective in a focused manner, it is necessary to evolve an effective GRM to be implemented in a time-bound and effective manner. Keeping in view the various factors involved in grievance redress issues, following areas warrant focused attention:

- Review processes, functions and resources and identify areas of dissatisfaction that can help achieve better outcomes and improve satisfaction of stakeholders.
- Identify areas susceptible to corruption and/or grievance generation and conduct a work audit of such areas. In addition, consider external/social audit in areas of very high public interface, with the aim of identifying wrong doers and improving processes and systems.
- Analyze the nature and cause of grievances with the aim of identifying systemic deficiencies in instructions, work practices and procedures, and effecting systemic changes to remove/correct these deficiencies. The analysis should be conducted

annually to identify grievance prone areas. Recommendations made in the analysis should be implemented so as to bring systemic changes and remove the cause of grievances.

- Fix responsibility in each and every case of delay, default or dereliction in performance of every day duties on failure to deliver services, and take disciplinary action to avoid recurrence. This will send a clear signal that in the event of failure to perform duties or deal appropriately with grievances within the time frame norms prescribed, a real possibility of having responsibility fixed on one's shoulder exists. Consider the feasibility of prescribing specific penalty clauses in such cases.
- The time frame for addressing grievances in the Complaint Cell should be clearly stipulated as 2–3 weeks from the time of receiving the complaint, depending on type and nature of grievances.
- Information Technology should be used in re-engineering of internal processes in order to improve efficiency and effectiveness and ensuring transparency and accountability. A dashboard can be maintained in the Mayor's office to display updated statistics related to grievances. The dashboard can help keep track of complaints at all levels and also provide a system of verifying with complainants if their problems have been addressed.

10.7.1 Need for Capacity Building of the Compliant Cell

424. To realize its vision and accomplish the mission and objectives for service delivery, KMC needs to be innovative and forward looking. Its traditional role as a top down utility administrator has to evolve into a new role in which it is more accountable and responsive towards citizen concerns regarding service delivery. In fact, the grievance redress mechanism of an organization is the gauge to measure its operational efficiency and functional effectiveness, as it provides important feedback on the working of the administration.

425. These factors need to be tackled properly through introducing systematic changes in dealing with citizens. "Prevention is better than cure" — on these lines, the best method to redress a grievance is not to allow the grievance to arise at the first instance. Core characteristic of an effective grievance mechanism is the ability to identify citizen complainants before they escalate into unmanageable disputes. LCs should focus on a preventive approach to identify, track and resolve grievances early; and should offer responsive and cost-effective redress through facilitation or other problem-solving processes where it is most needed.

10.7.2 Requisite Institutional Resources

426. In order to ensure the proper maintenance and functioning of the GRM, the project should make available human resources as required, in the form of internal resources within the project as well as external resources such as NGOs or other third parties. Currently, the LCs have already employed staff in their respective Complaint Cells.

427. In addition to this available workforce in the Compliant Cells, the IA should identify any additional personnel which may be required for the effective implementation of the GRM. Furthermore, due to the fact that a number of contractors and external parties will be involved in the project at various stages of its development, it should be ensured that the contractors/third parties abide by the principles established as part of the GRM. Wherever possible, relevant conditions will be inserted into the contracts, including right to investigate

reported incidents and penalties for non-compliance. Also, it will be ensured that vetted and agreed Codes of Conduct are developed and shared with the relevant contractor employees.

428. A GRM should have a realistic budget that will sufficiently cover the costs of its operations such as staffing, awareness and publicity campaigns, capacity-building infrastructure and support services, field inspections, meetings, documentation, and supplies. GRM budgets can also be built into the monitoring and evaluation or outreach and communications budgets of the project implementing agencies.

10.7.3 Training

429. The Complaint Cells staff needs specific and essential skills and the capacity to engage in an effective grievance resolution process. Therefore, it is important that the key staff of the Compliant Cell and those who are in supervisory role at the town, district and head office level should be provided with adequate orientation and training on grievance resolution. Such capacity building training should start immediately before implementation of the Project. The contents for such training/orientation programs should include the following:

- procedural training on receiving, registering, and sorting grievances;
- conduct of initial grievance assessments;
- effective communication, negotiation, and facilitation skills;
- management of the grievance redress process (developing flow charts, assigning roles, monitoring performance of staff dealing with complaints, and providing incentives);
- creating awareness regarding the usefulness of a GRM as an important source of feedback;
- problem solving; dispute resolution; and decision making; and their respective parameters, standards, and techniques; and
- documentation and reporting, including the use of "customer feedback" as part of an ongoing organizational learning process.

10.7.4 Create Awareness in Low Income formal and Informal Settlements

430. FDGs with communities revealed that people are unaware of the existence of any Complaint Cell or grievance redress mechanism available within LCs offices. For municipal services related issues they usually approach UC chairman and councilors and lower cadre field staff. On the KMCs' websites, telephone numbers are available but not accessible as many citizens either lack internet/telecommunication facilities or are discouraged from using the available complaints systems due to past experience of not getting an appropriate response from the helpline.

431. GRM should be widely publicized among communities and other stakeholder groups such as the affected communities, government agencies, and civil society organizations. Lack of knowledge about GRMs results in people not approaching and using them, and eventually, the Compliant Cell loses its relevance. People should also be informed about their options, depending on the types of complaints, but should not be encouraged to submit false claims. Criteria for eligibility need to be communicated. An effective awareness campaign launched to give publicity to the roles and functions of the GRM should include the following aspects:

- scope of the project, planned construction phases, etc.;
- scope of the GRM or types of admissible complaints, e.g., construction-related grievances, land acquisition and compensation-related grievances;
- types of grievances not acceptable to the GRM;
- who can access the GRM and how, e.g., phone and facsimile numbers, postal and email addresses, and websites of the GRM as well as information that should be included in a complaint;
- procedures and time frames for initiating and concluding the grievance redress process;
- boundaries and limits of GRMs in handling grievances;

432. A variety of methods can be adopted for communicating information to the relevant stakeholders:

- display of posters in public places such as in KMC's district and town offices, town customer centers and community centers, etc.;
- distribution of leaflets along with water bills to consumers;
- dissemination of brochures to civil society organizations; and
- print and electronic media, including radio.

10.8 Developing a GRM Framework

433. The GRM is intended to provide citizens of Karachi with an opportunity to voice complaints or concerns about project related issues. The GRM will ensure that their voices are heard, recorded and responded to in a satisfactory, objective and timely manner. The GRM is to be used an effective tool for early identification, assessment and resolution of complaints related to subproject to be implemented under CLICK.

434. The proposed framework is in line with WBG standards that require Grievance Mechanisms to provide a structured way of receiving and resolving grievances. The standards emphasize that complaints should be addressed promptly using an understandable and transparent process that is culturally appropriate and readily acceptable to all segments of affected citizens, and is at no cost and without retribution. The mechanism should be appropriate to the scale of impacts and risks presented by a project and beneficial for all stakeholders. The mechanism must not impede access to other judicial or administrative remedies.

435. The GRM will be disclosed to the stakeholders through written and verbal communication. The mediums to be used for this purpose are staff meetings, written communication and one-to-one meetings. Stakeholders will be made aware of the GRM in place at the time of joining, as part of the induction process.

10.9 Steps involved in the Resolution of the Complain

436. A set of procedures for receiving, recording, and handling complaints should be available in the GRM. They should include procedures for recording, registering, and sorting grievances; conducting an initial assessment of grievances; referring grievances to

appropriate levels or persons; determining the resolution process; making decisions, including parameters and standards for accurate and consistent decision making; directing relevant agencies responsible for implementing decisions; notifying complainants and other affected parties of eligibility, the resolution process, and outcomes; and tracking, monitoring, documentation, and evaluation.

10.9.1 Assigning the Role of a Focal person as the Grievance Officer

437. The Grievance Officer can be the person assigned for receiving and following-up complaints through a structured process, as explained in the following sub-section. For regular service delivery issues complaints will be handled through the In-charge of the Complaint Cell, as is the ongoing practice. However, CLICK subproject related complaints such as those concerning improper handling of social impacts during construction and project-related temporary disturbance to the communities (e.g. due to civil works such as dust, noise, disturbance on access, materials storage, traffic, recruitment of local workers, spillage, etc.), which can be normally solved immediately by the contractors but are not redressed, and LAR related issues will be addressed first at the Circle level then through the PIU. The Social and Resettlement Officer shall be given the responsibility as the Grievance Officer for coordinating the regular functioning and implementation of the GRM. The Grievance officer will report to the Project Director in the PIU.

438. Another possibility is to assign the supervisory consultant for the civil works, who is hired by the implementing agency/entity, to also receive complaints and communicate them to the subproject manager and/or the agency/entity implementing the subproject for follow-up. The procedures should also include time frames for processing grievances. Fixed and known time frames for processing and resolution enhance the efficiency and responsiveness of a GRM and help gain the trust and confidence of PAPs and affected communities.

10.9.2 Step 1: Receive, log and acknowledge the Complaint/Grievance

439. As part of the GRM, the grievances from the stakeholders or their representatives may be communicated verbally (in person or over a telephonic conversation) or in written form. All grievances communicated in any of these mediums shall be recognized and recorded. Once the grievance is recorded, a grievance number shall be allocated and communicated to the aggrieved. In case the grievance is assessed to be out of the scope of the GRM, a communication towards the same shall be made to the complainant, and an alternative mode of redress shall be suggested. As part of this acknowledgement a tentative timeline for the redress of the grievances shall be identified, in keeping with the process below. This acknowledgement shall be provided on the same day as the grievance is received.

440. A grievance log (or register) can be used to analyze information about grievance and conflict trends, community issues, and project operations to anticipate the kinds of conflicts that might be expected in the future, both to ensure that the grievance mechanism is set up to handle such issues and to propose organizational or operational changes. Sometimes, enacting policies or other types of structural change can resolve grievances around a common issue, rather than continuing to settle individual complaints on a case-by-case basis

10.9.3 Step 2: Initial Review, Examine and Investigate the Complaint/Grievance

441. Once the grievance is received and recorded, the Grievance Officer shall identify the KMC, DMC, contractor or personnel responsible for resolving the grievance. The Grievance

Officer and concerned department shall then undertake an enquiry into the specifics of the grievance. The aim will be to determine and analyze the cause of the grievance and subsequently identify suitable resolution measures. Depending on the sensitivity of the issue, a site inspection can be undertaken to check the validity and severity of the grievance. For this purpose, the Grievance Officer will also undertake discussions with the aggrieved concerned and external stakeholders. The inspection will be undertaken within three days of receiving the grievance.

10.9.4 Step 3: Resolve or Escalate Complaint/Grievance

442. Based on the case investigation, the grievance officer, in consultation with the concerned departments, shall identify a suitable resolution to the issue. In case the issue is beyond the purview of the official at the town level, it should be escalated to the district level. If, however, the district level official is not able to identify an adequate resolution for the grievance, s/he may choose to ask for an escalation of the grievance to the Grievance Redress (GRC), see Sub-section 10.11 for details. The Grievance Officer will forward the grievance to GRC. The GRC will endeavor to resolve the grievance within 21 working days. For assisting the communication of grievances, records of complaints (sex-disaggregated) will be maintained in the database at the Project office.

10.9.5 Step 4: Close and Prepare Outcome Reports

443. The records of the grievance register shall be updated every working week with the present status of the grievance. Once the grievance is resolved, and the same has been communicated to the complainant, the grievance shall be closed in the grievance register. The grievance register should also provide an understanding of the manner in which the grievance was resolved. These instances shall then serve as references for any future grievances of similar nature. Step 5: Monitoring and Follow up.

444. The Grievance Officer will update the Complaint/Grievance Register on a weekly basis to indicate resolved (closed-out) and unresolved cases, those pending with the Grievance Committee or with courts. The Grievance Officer will ensure that the status of all complaints/grievances is kept current and will brief the Project Director on a weekly basis on the status of all current complaints/grievances. On a monthly basis, the Grievance Officer will produce a summary status report that defines trends in the types of complaints and sends this report to the Project Director and other relevant officials of IA. An annual sex-disaggregated qualitative review of a sample of complaints processed (ensuring variation such as along type of complaint, resolution status etc.) will also be undertaken to analyze the efficacy of the system. Regular monitoring of the grievance mechanism and its outcomes, particularly of trends and patterns, will be critical to ensuring to identify systemic problems and adapt practices accordingly.

10.10 GRM Structure

445. A GRM should have a clear structure that explicitly spells out how it functions: the roles and responsibilities assigned to different levels or personnel responsible for handling different aspects of the grievance resolution process such as receiving, recording, and sorting complaints; conducting assessments and resolution processes; coordination; and monitoring.

446. The Project's Grievance Redress Mechanisms (GRM) will take one of the following three processes:

- Those that can be resolved directly at the town level between Executive Engineer (XEN) of KMC or DMC and the aggrieved party (first order mechanism);
- Those that are referred to district/circle level to Superintendent Engineer (SE) member of the GRC (second order mechanism);
- Those that are referred to Head Office (third order mechanism).

10.10.1 First Order Mechanism

447. Complaints and Grievances will be received through the following channels:

- A phone call and/or designated email address to the Customer Office
- By post to the XEN
- During the visit of Sub Engineer to the communities
- A phone call and/or designated email address to Head Office that will be forwarded to XEN at town level customer office

448. The XEN at the Town level will follow the process steps discussed below.

- Grievances will be preferably in writing; however, any citizen can lodge his/her complaint verbally or via telephone. Once lodged this then must be written and logged by the XEN Office
- Each complainant will receive a Grievance Acknowledgement Form which acknowledges that the grievance has been received. The Grievance Acknowledgement Form has a reference number and includes a commitment from the XEN to provide a response within three days of logging the grievance.
- The recorded complaint is verified on the ground, if it is valid and relevant to the subproject, then the focal point will discuss it with relevant parties for follow-up;
- The XEN will depute sub-engineer to contact and if required meet with the Complainant to discuss his/her grievance and visit the site if it is a minor issue such as sewer overflow or man hole cover issue that should be resolved on the spot or a straight-forward complaint such as dust or noise during construction, can be solved on site immediately by a single entity, (i.e., contractor).
- If possible, the concerned official will address the complaint in a face-to-face discussion, providing information or clarification (but still document the grievance/complaint). The focus of resolving the complaint will be engagement and dialogue.
- In the case of a grievance, where further action or more time is required, the XEN will mention the timeline when further action will take place. The XEN Office will inform the complainant about the timeline of further action.
- If the problem not resolved at the XEN level or a grievance is beyond its authority it will be escalated to the second level order. For instance, a complaint that need to be resolved through laying a new water supply pipeline that might need several days so that solution of such complaint has to be brought up to the higher level for resolution.

- Solved complaints will be recorded and unsolved complaints that need to be followed up at the higher level are also recorded.

10.10.2 Second Order Mechanism

449. If the aggrieved person is not satisfied with the outcome of initial stage consideration, or if town level review is unable to reach a proposed solution, the aggrieved person can refer the issue to the Superintendent Engineer (SE) at the district level. The SE will follow the same process as described in the First Order Mechanism. In case the complainant is still dissatisfied with the mediation by the SE, the grievance will be referred to the GRC. The Grievance Officer keeps a record of all complaints referred to the GRC including a description of issues raised and the outcome of the review process.

10.10.3 Third Order Mechanism

450. Those issues which were not resolved directly at the SE level will be sent to the Grievance Redress Committee with PIU representation. In the event that a grievance is escalated to the Third Order mechanism, the Project Director will sign off that the appropriate measures have been taken to resolve the grievance through the First and Second Order Mechanisms. However, in cases in which the parties have been unable to reach a voluntary settlement:

- The complainant can contact the Grievance Officer in the first instance to seek further clarification if for any reason he/she is dissatisfied with the explanation of the review.
- The GRC, if found necessary, will further review the grievance by themselves or appoint their nominees.
- In the event that a case is referred to the GRC, the Grievance Officer will report about the status of the case on a bi-weekly basis to the Project Director when IA and complainant decide together that the procedures are not acceptable to each other for the situation of the concern.
- The GRC will aim to resolve concerns promptly, in an impartial, understandable and transparent process tailored to the specific community, and at no cost or without retribution to the complainant.

451. The complainant has the right of appeal to any recognized institution open to any citizen as stipulated by the laws of Pakistan if still not satisfied with the outcome and explanation of the Grievance Committee's review.

10.11 Grievance Redress Committees

452. GRC should be established at the Head Office level through an official notification issued by the Chairman of KMC or DMC. The GRC will be mandated to deal with all types of grievances arising at the community level. GRC meetings will be held at the respective main offices/districts to be accessible to the PAPs. The GRC members include the Project Director as chair, the Social Development Officer, the Gender Officer, In-charge Compliant Cell, a senior social safeguard specialist from supervisory consultant, and a member nominated from a civil society organization. The GRC has the right to request the project technical staff, and officers working in head office, town and district level to attend the meetings and provide information. GRCs should ensure that objective and fair decisions are taken and agreements made. The procedures include verifying documents; conducting field inspections to verify the authenticity and eligibility of the grievance reported; listening to different parties involved; referring cases to independent agencies for technical assessment.

Responsibilities of the GRC Secretary

The Social Safeguard Specialist will serve as the Secretary with the following responsibilities:

- facilitate and provide information and services to the GRC members;
- document the GRC proceedings, decisions, and recommendations;
- maintain grievance-related documents, reports, and attendance;
- liaise with the GRC chairperson;
- facilitate arrangements for field inspections;
- handle all payments and expenses related to GRC operations;
- provide feedback to PAPs and the Project Director involved in grievances; and report progress to the Project Director.

453. The GRM members should be qualified and experienced who have the respect and confidence of the affected communities. It is also important to maintain a gender balance within the GRC and to ensure representation of women.

10.12 A Mechanism to Manage Subproject Related Complaints

454. Management of the construction-related complaints will be the contractor's responsibility under its contract with the IA. Usually these kinds of complaints are described in SMP and include issues related to dust, flooding, lost access, dangers to life, deteriorating water quality and quantity, damage to property and crops, soil erosion, and others.

455. The SMPs of the subprojects to be prepared by IA will clarify the mitigation measures for the social impacts, and the supervisory consultant will report the types of complaints, measures taken, and status of resolution on a monthly basis to the IA and WB. The complaints received by the supervisory consultants will be entered into a computer database and the following information will be included: nature of the complaint; complaint category, i.e., noise, property damage, etc.; source and date of receiving the complaint; impact location; name and address of the complainant; gender of complainant; action taken; current status; and, complainant's satisfaction with resolution process. Current status on complaints will be analyzed by the supervisory consultants in the form of graphs and charts) and will be included in their monthly progress reports on implementation of the SMP to be submitted to the IA and WB.

456. To address GBV-related complaints, the Project will make certain the availability of a GBV-sensitive GRM with multiple channels to address a complaint. The social and gender specialist in the PIU will be the focal person for properly handling GBV allegations including assessment of the nature of the complaint, seeking support from various service providers such as *Madadgar* and CPLC helplines. The PIU should have specific procedures for GBV including confidential reporting with safe and ethical documenting of GBV cases.

11 LABOR AND WORKING CONDITION MANAGEMENT FRAMEWORK

11.1 Introduction

457. This framework describes the requirements for CLICK with regard to labor and working conditions applicable during the implementation phase of the Project. It aims to ensure the management and control of activities that may pose labor-related risks. This framework sets out potential impacts and consequences and describes how they will be mitigated. KMC will use commercially reasonable efforts to require contractors, or other intermediaries procuring labor, to apply comparable standards.

458. The objectives of this Framework are to:

- Promote fair and equitable labor practices for the fair treatment, non-discrimination and equal opportunity of male and female workers;
- Establish, manage and promote a healthy management -worker relationship;
- Protect workers' rights including migrant and third party workers;
- Promote healthy, safe, secure and comfortable accommodation that does not impact negatively on the communities in the project area.

11.2 National and International Legal Requirements

459. Various laws, policies, systems, standards and international good practice codes are applicable to the implementation of this Plan. Such requirements are outlined in the following section. For details refer to **Section 3**.

11.3 Applicable Provincial, National and International laws and regulations

460. All applicable national and provincial (Sindh) laws and regulations will apply, especially those that concern employees' and workers' wages, benefits, living conditions, occupational health and safety. In some situations, LCs may apply, pursuant to these laws, for exemptions in order to align working conditions with operational contingencies and global best practice (Refer to **Section 4** for details).

461. IA will ensure high standards related to catering, camp management and associated logistical operations in accordance with the international best practices e.g. upholding requirements and expectations related to camp management and catering under the Logistics Best Practice. IA shall uphold requirements to comply with applicable laws, regulations, permits, licenses, and other legally binding requirements or agreements.

11.3.1 Personnel and Training

462. Maintaining operations that protect safety, health, and the environment while conforming to laws and regulations, requires careful selection, placement, ongoing assessment, and proper training of employees.

11.3.2 Socioeconomic Management Standard

463. The purpose of this standard is to provide guidance on how socioeconomic issues related to labor will be identified. In this regard, following should be specifically considered:

11.3.3 Consultation

464. Consultation with relevant communities, government officials, and appropriate institutional stakeholder or individuals to share information, solicit opinions/ideas/feedback, and respond to expressed concerns.

11.3.4 Identification

465. Identification of potential socioeconomic issues/risks including, but not limited to, labor management, interaction with vulnerable populations, involuntary resettlement, compensation, employment and training, and the procurement of goods and services.

11.3.5 Prevention and Mitigation

466. Development of appropriate prevention (or enhancement), control, mitigation, and monitoring strategies related to potential socioeconomic issues/impacts. The requirements in relation to this framework, the most pertinent requirements are:

- Performance Standard 2: Labor and Working Conditions (International Finance Corporation, 2006)
- Universal Declaration of Human Rights (United Nations, 1948)
- International Labour Organization Core Conventions
- United Nations Human Rights Council: Report of the Special Representative of the Secretary General on the issue of human rights and transnational corporations and other business enterprises– Protect, Respect and Remedy: a Framework for Business and Human Rights (Ruggie, John, 2008)
- International guidelines on Standards of Business Conduct provide a worldwide framework for responsible operations and are consistent with the spirit and intent of the ILO Declaration on:
- Fundamental Principles and Rights at Work (International Labour Organization, 1998). The
- Declaration sets an obligation on ‘member states’ to promote and realize the principles of:
    - Freedom of Association and effective recognition of the right to collective bargaining
    - Elimination of all forms of forced or compulsory labor
    - Effective abolition of child labor
    - Elimination of discrimination in respect of employment and occupation

467. International standards that will be followed by LCs, relevant to labor and working conditions include:

- ILO Declaration on Fundamental Principles and Rights at Work (International Labour Organization, 1998)

- Voluntary Principles on Security and Human Rights (Secretariat for the Voluntary Principles on Security and Human Rights, 2000)
- United Nations Global Compact

468. The Human Resource department is responsible for managing and implementing employment policies, guidelines and procedures, including equal opportunity employment. Their role ensures compliance with both national and provincial labor law requirements for local recruitment and reporting. Other key responsibility ties include the management of:

- Industrial relations
- Workplace grievance program
- Working hours expectations
- Remuneration and payroll
- Privacy management
- Contractor Human Resources management

11.4 Risk and Impact Mitigation

469. Mitigation measures are defined on the basis of national and international standards, together with other relevant industry good practices and risk assessments appropriate to subproject activities.

470. KMC, DMC and their contractors are required to implement and comply with the following mitigation measures, as appropriate to their scope of work, in order to avoid, minimize and control impacts and risks with regard to labor and working conditions.

471. **Table 21** presents a summary of the potential risks and impacts related to labour and working conditions, together with mitigation measures to avoid, eliminate or reduce associated impacts.

Table 21: Risks and Impact Mitigation

Category	Worker Impacts/Risks	Subproject Impacts/Risks	Mitigation Measures	Responsibility
Recruitment and selection of Workers	Perception of unfair recruitment and selection practices.	Community tensions –stop work practices that affect implementation.	Human Resources policy including at least: • Selection criteria for each position • Equal opportunities for men, women and transgender • Method and place of recruitment • Maximize work opportunities for local citizens • Enhance local employees' skills base through training	IA

Category	Worker Impacts/Risks	Subproject Impacts/Risks	Mitigation Measures	Responsibility
Child Labor	Recruitment of individuals who, by virtue of age, would be exposed to hazardous situations and be subject to impaired social development	Increased health and safety risk to workforce, potential non-compliance with national labor laws, and reputational risk to the CLICK.	• Human Resources and contracting policies that cover recruitment and selection processes that specifically address issues associated with child labor.	IA
Employment conditions - wages and benefits	Perceptions that wages, salaries and benefits are not fair according to market rates .	Workers action - work stoppages, absenteeism, sit-ins, sabotage	• Human Resources policy with respect to equal pay for equal work according to local conditions and industry averages • An effective employee complaints/grievance process	Contractors
Worker Accommodation/camp Specifications. .	Accommodation is considered sub-standard which leads to discontent amongst the residents and concerns about perceived health risks	Workers have low morale and perceive KMC/DMCs to not care about their welfare, which in turn affects motivation and productivity .	• Build camps to the minimum camp specifications. The following plans will be applied as necessary: • Minimum Health Requirements • Minimum Camp Specifications for Operations Accommodation • Emergency Response Plan • Security Management Plan.	Contractors
Camp management practices	Residents do not live in harmony and the potential for conflict rises. Residents do not know how to complain or record a grievance		Implement an induction program to be attended by all residents that covers at least the following: • Camp rules and regulations • Code of conduct • Camp grievance mechanism • Camp disciplinary procedure • Cultural awareness • Health, safety and security. • First aid kits are adequately stocked	Contractors
Housekeeping	The general appearance of the camp deteriorates making camp life unpleasant .	The overall camp experience is compromised which in turn leaves workers demoralized and	• Ensure that camp grounds and common areas are routinely cleaned and organized with appropriate signage in place, and that grounds are maintained.	Contractors

Category	Worker Impacts/Risks	Subproject Impacts/Risks	Mitigation Measures	Responsibility
		unproductive	• Establish easily accessible, designated smoking areas which are clearly highlighted and regularly cleaned. • Ensure that equipment and facilities are kept clean and well maintained.	

11.5 Monitoring and Reporting

472. Monitoring will be undertaken for both direct hires and contract workers. IA will undertake both desktop and field-based inspection programs to confirm that specified mitigation measures are being implemented effectively and achieving the intended outcomes. LCs will undertake periodic assessments to determine the degree to which the commitments outlined in this Plan are being met. This will include camp inspections and monitoring of grievances.

473. The assessments will be undertaken by suitably qualified personnel. Assessment findings will be prioritized and closed in a timely manner. Processes for monitoring, assessment and audit will be developed to:

- Assess actual impacts against predicted impacts.
- Document the implementation and effectiveness of management and mitigation measures.
- Demonstrate compliance with applicable legal and other requirements.

474. Performance indicators will be used to measure and track performance against the effectiveness of mitigation and control measures described in this Framework. Performance indicators must be measurable against a specified target. The performance indicators outlined in **Table 22** apply to this Framework.

Table 22: Labor and Working Conditions Performance Indicators

Performance Indicator	Measurement	Target/Benchmark	Frequency of Report
Grievance lodged	Type and Number	Closed or adequately responded to within 30 days	Monthly
Disciplinary cases	Type and Number	Reduction in disciplinary Breaches	Monthly
Pay slip queries	Type and Number	Downward trend	Monthly
Lost hours due to injury/accident	Type and Number	Zero	Monthly
Food or lodging complaints	Type and Number	Reduction and/or downward trend	Monthly
Housekeeping issues raised	Type and number	Closed before next meeting	Monthly

475. Performance indicators should be carefully recorded and graphed where relevant for remedial action to reduce potential risks. They will form a key component of monthly reporting to LCs. A Social Action Tracking System should be developed and will be used for tracking and stewardship of non-conformances identified as part of monitoring and assessment and audit activities described in this framework. A periodic report will be compiled to address aspects related to labor and working conditions.

11.6 Labor Influx

476. Labor influx refers to people who move to a project area for the purpose of project-related employment, economic opportunities and associated reasons during project construction[85]. Project-induced labor influx includes:

- Direct labor influx: non-local people who come to the area to take employment with the project;
- Indirect labor influx: non-local people who come to the area for work providing goods and services to the main contactors or to the mobile workforce;
- Labor-associated influx: such as workers' families, trade workers, refugees and/or non-economic migrants.

477. While project-induced influx can benefit the project and host communities, (e.g., by increasing business opportunities, improving the availability goods and services, and offering employment to locals), more often than not there are significant adverse impacts. If not carefully managed, labor influx can negatively affect public infrastructure, utilities, public services, housing, health, food security and social dynamics in the project area.

478. Influx-related social impacts that are typically overlooked include: housing, drugs, social services, changes to the cost of living, poverty, and competition for resources and

[85] The World Bank Guidance Note to address potential impacts caused by temporary project induced labor influx (The Note is available at: http://pubdocs.worldbank.org/en/497851495202591233/Managing-Risk-of-Adverse-impact-from-project-labor-influx.pdf.)

employment. A full assessment would consider the significance of these impacts. It should be noted that sexual and gender-based violence, which is a key issue for the WB, is specifically and substantively considered by projects, either as a line of inquiry in risk considerations or in terms of outcomes in the context of all proposed subprojects.

11.7 Mitigation Planning

479. Planning for the mitigation of influx-related social impacts is something that should show up in the SIA or related documents prepared by the project proponent, such as an SMP or Contractor Social Management Plan (CSMP). Where the risk of significant influx and associated negative social impacts are found to be high, it may be appropriate to prepare a stand-alone Influx Management Plan.

480. There are a number of mitigation measures put forward in the planning stage in various projects that are particularly important for minimizing adverse social effects stemming from labor influx.

481. Although many of these mitigations are developed in order to address other issues, they also provide benefit in managing influx-related issues, and include the following:

- Camp-based worker housing;
- Provision of camp-based medical services to avoid strains on local services;
- Ensuring adequate health and safety conditions for workers and promoting HIV/AIDS awareness;
- Address GBV and SEA risks and impacts
- Worker codes of conduct, including training on conduct expectations;
- Social and cultural awareness training for workers;
- GRMs for community members (not limited to resettlement);
- Maximizing local employment;
- Special initiatives to support women's economic opportunities and protections

482. The key recommendations to project proponents to improve the identification and management of social impacts associated with labor influx, on the basis of proportional risk, are as follows:

- Project Screening: The IA should require projects to strengthen the screening/scoping process to determine if labor influx and social impacts are likely to be of significance and to provide documentation supporting the position taken.
- Baseline Data: The IA should ensure that projects document a robust socio-economic baseline context and provide information on project labor needs and project phasing with sufficient detail to be able to characterize the likelihood and significance of labor influx.
- Relevance of Mitigation to Identified Risk: Project proponents need to scale mitigation measures appropriately to the identified risk.

- Mitigation Compliance Reporting: Proponents should ensure that contractor obligations and commitments related to labor influx mitigation and worker management are specified in contractor documentation, and that project management systems are in place to ensure application of identified mitigations. This requirement should be reinforced in mandatory WB audits and inspections.
- Mitigation Effectiveness Monitoring: The IA would require projects/contractors to monitor and report on the implementation and effectiveness of labor influx-related mitigation measures.
- Bidding Document Guidance: IA guidance should be prepared setting out the minimum requirements regarding contractor bidding documents. This should advise on consideration of social safeguards and the requirements relevant to labor influx and worker management.
- Training: It is recommended that the IA provides training to clients on monitoring contractors to ensure that social mitigation requirements are effectively implemented.

12 INSTITUTIONAL ARRANGEMENTS

12.1 Overview

483. The social safeguards related activities described in this SMF involve distinct roles, functions, processes as well as different actors and various agencies. The role and responsibilities of these actors and agencies involved in all social safeguard related activities at different levels are discussed below.

12.2 Institutional Roles and Responsibilities

12.2.1.1 Project Steering Committee

484. An inter-departmental Steering Committee will be notified by GoS for this project, to provide overall strategic oversight of the project and review implementation progress on a regular basis. It will be chaired by Chairman, Planning & Development Board (P&D) or his nominee/representative and will have high-level representation from all relevant agencies of the project. This Committee will facilitate inter-agency coordination to ensure adherence to project objectives; resolve inter-agency disputes related to the project, if any; provide policy, regulatory and institutional recommendations related to the project; and help facilitate timely availability of GoS share of project financing, if any, and timely approvals for project-related matters pertaining to agencies included in the committee, where relevant.

12.2.2 Implementation Arrangements

485. The following GoS Departments / agencies will directly manage and be responsible for day-to-day project implementation: LGD, E&TD, Sindh Investment Department (SID) and 8 LCs. LGD will have overall responsibility for the following components: Component 1 (performance-based grants to LCs); Component 3.2 (PPP node at LGD) and Component 4 (TA for SWM). LGD will be responsible for coordinating and managing the performance-based grant system and providing centralized TA support to LCs. It will administer the APA process, ensure timely flow of grant funds to eligible LCs, conduct monitoring and consolidated progress reporting for all components under its purview. LGD will directly implement various TA activities to assist LCs in achieving the performance conditions, and to assist LCs in implementation of all aspects of the performance-based grants, including capital investment subproject. A Project Management Unit (PMU) will manage these functions on behalf of LGD. It will be headed by a full-time Project Director and staffed with necessary technical experts hired from the market or deputed from GoS as necessary, especially in the following areas: technical (institutional development, capacity building), FM, procurement and contract management, and environmental and social safeguards management. The LGD PMU will also implement activities under Component 4 on behalf of, and in close coordination with, SSWMB. SSWMB is a statutory body with its own Board but is administratively attached to LGD. E&TD and SID will implement Components 2 and 3.1 respectively. PMUs at E&TD and SID will manage these functions on behalf of their Departments, including all fiduciary responsibilities. These PMUs will be headed by a full-time Project Director and staffed with necessary technical experts hired from the market or deputed from GoS as necessary, especially in the following areas: technical (information technology, property tax systems, business facilitation, inter-agency coordination), FM and procurement.

486. LCs will directly implement subprojects under Performance-based grants. They will do so through their own staff and hiring / deputation of any additional required staff, especially for

technical, environmental and social safeguards, FM and procurement functions. LCs will also rely substantially on LGD for technical support.

487. IA has the overall responsibility for preparing the SMF and implementing the social safeguard plans with WB approval. They will ensure that all compensation, resettlement and rehabilitation activities are carried out satisfactorily before the disbursement of funds for construction work to commence. IA will be mainly responsible for the execution of the subprojects and for delivery of safeguards management in a manner consistent with World Bank policy principles and the national legal framework. Besides, the IA will engage supervisory consultants including safeguards specialists for assisting it in preparation, implementation and monitoring of the safeguard documents for different subprojects during implementation of the investment program.

488. LGD will provide assistance to LCs in screening, selection, design, supervision and monitoring of subprojects as requested by LCs, and in the preparation and implementation of environment and social management plans for LCs' subprojects if required, consistent with the procedures in this SMF / RPF. LGD is also responsible for monitoring and consolidated progress reporting for Component 1.

12.2.3 Project Management Unit (PMU)

489. At Project level, IA will exercise its functions through the PMU housed in LGD. For purposes of safeguards issues under component 1, safeguards capacity is required in the PMU in LGD and in LCs.

490. The PMU will be responsible for general execution of the project and streamlining the safeguards related tasks of different subprojects headed by the Project Director (PD). The PMU will ensure compliance with national as well as WB environmental and social safeguard requirements including preparation of SMF, RAP/ARAPs, PCRMP and other management plans. The PD will be the lead person for implementing the safeguards instruments for all subprojects and for maintaining regular contact with local community and authorities. The PMU will collect information and progress on social safeguards compliance through Social Safeguard Management Cell (SSMC) which will be established within the PMU and will be tasked with day-to-day activities at project and subproject level.

491. For the purpose of this Project the PMU will serve as a nodal point to provide technical backstopping with regards to safeguards management for all CLICK subprojects and will have the overall responsibility for planning, implementation and supervision of safeguard functions described in this SMF of the investment program.

492. The PMU will keep a close liaison with the World Bank safeguards team to seek clarity and guidance on safeguards requirements of the Project and will oversee the supervisory consultants for preparation of safeguard documents. PMU will ensure quality of safeguards documents prepared by the consultants and shall deliver all safeguards related documents to World Bank for review, clearance and disclosure. The role of PMU will include.

- Coordination with the provincial government, Planning & Development Department, Board of Revenue and other line departments;
- Coordination with the supervisory consultants and keep an oversight to facilitate them during impact assessment, census and socio-economic surveys and consultations with PAPs during for RAP/ARAP preparation. This is to ensure consistency of

approach and avoid variation in information obtained and given and to address issues immediately as they arise on site;

- Ensuring that the RAP/ARAP preparation consultants should in conformity with the RPF provisions and the impacted assets should be accurately assessed and linked to the respective PAPs.
- Coordination with supervisory consultants, Board of Revenue and other line departments and units to streamline resettlement planning activities
- Reviewing RPF and RAPs/ARAPs (draft/updated), coordinating with World Bank during the review and approval process, ensuring timely disclosure of approved RAPs/ARAPs on IAs Website (KMC, DMCs, LGD), and translation of Summary RAPs/ARAPs in local language for disclosure to PAPs;
- Coordination with the SSU for review of RAP/ARAP implementation progress and ensure timely preparation of quality monitoring reports. The monitoring reports will be internally reviewed to ensure that quality final reports are shared with World Bank for review and acceptance and shall ensure timely disclosure of approved RAPs and monitoring reports on KMC Website.
- Ensuring timely disclosure of design and LAR related information to the PAPs which may include information on project alignment and design, ROW land acquisition process and publication of notices under LAA provisions by the LAC in a format and language easily understood by PAPs and at easily accessible places.

12.2.3.1 Social Safeguard Management Cell (SSMC)

493. Since the LCs have been entrusted the responsibility to take the lead in delivering the mandate of the CLICK, it is pertinent to address the limited implementation capacity of the IAs in implementing the SMF and RPF. Therefore, a dedicated Social Safeguard Management Cell (SSMC) will be established in PMU. The SSMC team will include a Social Development Specialist, a Social & Gender Specialist and two social mobilizers (male and female) to oversee community engagement and GRM process. The Team will be responsible for grievance redress, organization of training programs on social management aspects and the successful implementation of all SMF related activities. In each PIU, a focal person – Social, Resettlement and Gender Specialist will be positioned to support LC social safeguard related matters.

494. The key role of the SSMC will be to coordinate supervisory consultants in the preparation of SIA/SMP, PCRMP and RAP/ARAP of subprojects in accordance with the provisions laid out in this SMF and annexed RPF through hiring a consultant/or by supervisory consultants and these will be submitted to WB for approval.

495. To achieve this, the role and responsibilities of the SSMC will be to:

- Screen proposals/studies for the subprojects related to safeguard issues, in compliance with safeguards requirements specified in this SMF;
- Maintain records of all proposals and screening decisions;
- Ensure that the supervisory consultants will implement the TOR consistently, particularly for safeguards mainstreaming in terms of process and outputs;

- Provide general oversight of the activities under Component 1 to ensure compliance with this SMF;
- Function as grievance redress office on LAR related matters/concerns raised by the PAPs during RAP preparation or the complaints forwarded by the project GRC or by the PAPs unsatisfied with decision of the project GRC. The complaints will be registered and acknowledged to PAPs and addressed after investigating the facts and hearing the complainants;
- Facilitate information dissemination and consultation with PAPs including men, women and vulnerable groups in subproject towns on all matters affecting PAPs to ensure compliance with the requirements of the RPF, World Bank's Social Safeguard Policies and Land Acquisition Act 1894;
- Mobilize and facilitate the PAPs to process their compensation claims and receive compensation and coordinate with and support the Land Acquisition Collector (LAC) and PD throughout compensation disbursement process in office and field during preparation of claims and issuance of compensation vouchers against land and land based assets under LAA provisions and compensation cheques for entitled R&R allowances and income restoration measures under RAP provisions;
- Prepare social safeguard subproject specific checklists, guidelines, reporting formats, and reports
- Monitor and evaluate the implementation of the plans or studies.
- Develop, organize, and deliver training programs and workshops to agencies/entities implementing the Project, local governments or affected stakeholders.
- Prepare a bi-annual Implementation Report on the progress and status of the implementation of the safeguard instruments
- Conduct or supervise safeguards compliance reviews of each subproject.
- Prepare safeguard progress and performance reports.
- Recruit safeguard training personnel or agencies.
- Keep the social management framework updated, based on the project's operational experience.

496. The PMU at LGD will play a central role in ensuring that LCs comply with the procedures of the SMF / RPF in the screening, selection, design and implementation of subprojects. It will manage and provide a package of centralized technical assistance (TA) and capacity-building support to LCs, and for the development of critical systems to achieve annual performance measures– including systems for environmental and social safeguards management, and on investment planning, citizen engagement and access to information. It will provide assistance to LCs in screening, selection, design, supervision and monitoring of subprojects, through in-house expertise and by hiring consultancy services. It will also provide assistance to all LCs in the preparation and implementation of environment and social management plans / safeguard instruments for LCs' subprojects consistent with the SMF / RPF. LGD will also engage consultancy services for third party monitoring of progress of subproject implementation (including compliance with safeguards instruments); and for development and implementation of a communication campaign based on a stakeholder

engagement strategy to raise awareness of the scope and impacts of the project. LGD will also submit consolidated subproject proposals to the Bank for review and no-objection, on behalf of all LCs.

12.2.3.2 Grievance Redress Committee

497. A project wide GRM will be set up for all subprojects under the investment program (refer **Section 10** for details) to address grievances arising from social impacts. The GRM will have a two-tiered structure at the subproject level and another third tier at the implementing agency level, enabling immediate local responses to grievances and higher-level review addressing more difficult cases not resolved at the local level. The formation of GRC and its functions will commensurate with sub-project needs and requirements and will be elaborated in each subproject RAP.

12.3 Supervisory Consultants

498. The IA will engage Supervisory Consultants (SC) having adequate human resources for assisting PMU in safeguards planning and preparation, in addition to the implementation and monitoring of SMF. The Supervisory Consultants will mobilize a team of qualified resettlement specialist with experienced enumerators and surveyors for impact assessment, census, social surveys and conducting meaningful consultations during project design stage who will facilitate the PMU in updating the RPF (if required) or draft RAPs prepared based on feasibility level design for subprojects. Overall social management responsibilities of the SC include to:

- Undertake the screening of each subproject and identify main social impacts and prepare project descriptions;
- Undertake adequate consultations with affected people and studies of the subproject area to identify baseline conditions and impacts;
- Coordinate in land acquisition process and resettlement planning activities for the subproject, review impact and census data, conduct field verification and update census of PAPs linked with project impacts by type, category and severity; prepare compensation packages for each PAP on the basis of agreed unit rates and provided entitlements criterion ; update the approved draft RAP (as and when required); Based on census and impact categories of PAPs, prepare and issue ID cards particularly for the PAPs without legal or legally recognizable title for land and other lost assets;
- Coordinate with PAPs and other stakeholders including line government departments and CSOs, and conduct meaningful consultation with all PAPs and other interested stakeholders on the LAR related issues and maintain a record of the consultation including consultation meeting attendance sheets, pictures and meeting minutes;
- Coordinate with line government departments at District and Town level including Land Revenue Department, Forest Department and Agriculture Department as well as with local community, property agents and appraisers for asset (land and other assets) valuation and compensation calculation in a manner consistent with the RPF provisions;

- Ensure that land acquisition activity after publication of Section 4 under LAA, 1894 is followed by updating land records, and land price assessment is reflective to current market rates following procedures outlined in the RPF.
- Coordinate and facilitate the negotiation committee in case the land is acquired through private negotiation and assist the committee for determining the base market value considering factors as outlined in the RPF and communicating with PAPs for private negotiations; assist the negotiation committee to document the negotiations process and retain the meeting record including attendance sheets, meeting minutes and pictorial presentations etc.; and facilitate negotiation committee and the PAPs to finalize and execute sales deed if negotiation is successful;
- If negotiation is not successful, coordinate with the local land revenue authorities for completing land acquisition process under LAA provisions, participate in Price assessment Committee meetings at each district to clarify replacement value/cost and ensure the assessment is fully reflective of current market value arrived following provisions of the RPF and LAA procedures;
- Ensure timely disclosure of information to all PAPs about project design alignment, land acquisition notifications issued by the LAC and facilitate information dissemination and consultation with PAPs on all matters and disclosure of RAP provisions and information about the GRM and compensation payment mechanisms ;
- Monitor day to day LAR implementation progress and prepare monthly progress reports and periodic social monitoring reports including consolidated progress of RAP implementation and social management achieved during monitoring period; and
- Provide technical assistance and training to the LCs, PIUs, SSMC, line departments, SEPA and contractors and advice on appropriate modifications to improve their effectiveness.
- Assist PMU in preparing bi-annual subproject reports on the SMF implementation, to be submitted to the Steering Committee and the World Bank.

12.3.1 The District Government Departments

499. The SMF management requires support from various line departments and government agencies. The jurisdiction and functions for land administration, valuation, acquisition and compensation rests with provincial Board of Revenue which exercises its jurisdiction and functions through its Divisional and District Officers including Deputy Commissioner/District Officer Revenue and Land Acquisition Collector at district and town levels. All land acquisition affairs, including publication of notifications under LAA provisions, identification and assessment of land, determination and delivery of compensation for land acquired under law rest with the LAC. The LAC is assisted by the sub-district level land revenue officers.

500. Functions pertaining to assessment of compensation of non-land assets rest on provincial line-agencies and their district-level offices. Assessment of compensation for, buildings' and other built infrastructure pertains to the buildings with SBCA. The compensation for wood tree losses is assessed by the Department of Forestry.

12.3.1.1 Role of the Contractor

501. The contractor(s) to be employed to undertake construction works will also have a role to play in the implementation of the subprojects. The contractor's roles will include the following:

- Develop a work plan based on the social safeguards;
- Submit the plan of work and schedule to the PIU, LCs;
- Train/create awareness for all personnel and community on relevant social safeguards measures; and
- Submit implementation report on social safeguards to the PMU.

12.3.1.2 Independent Monitoring Agency (IMA)

502. LGD will hire an Independent Monitoring Agency (IMA) or an individual expert (with team) to conduct independent monitoring and evaluation for the implementation of RAP/ARAPs. The IMA shall review the implementation progress throughout the RAP/ARAP implementation, review the internal monitoring reports (IMR) prepared by PIU, evaluate the level of achievement of RAP/ARAP objectives, identify gaps, if any, and propose remedial measures for implementation. The IMA shall be a firm hired either for all Projects under the investment or for individual subprojects.

12.4 Project Affected Person Committees (PAPC)

503. PAPCs of male and female PAPs will be established at each subproject site through community mobilization. The community mobilizers will play a key role in establishing these PAPCs.

504. PAPCs will be involved in planning and implementation of the RAP/ARAPs, more specifically in:

- finalizing the exact alignment and layout of the physical infrastructure;
- assessing permanent or temporary losses of assets;
- preparing the inventory or listing of crops, trees and other assets falling within the ROW to ensure transparency and fairness;
- establishing unit rates for compensation;
- monitoring payment of compensation for loss of assets and livelihood to individuals;
- implementation of livelihood restoration and enhancement or substitution measures; and
- Grievance redress at the field level.

505. The institutional set-up involved in social safeguard management at, provincial, LC and project level is presented in the **Figure 14** shown on next page.

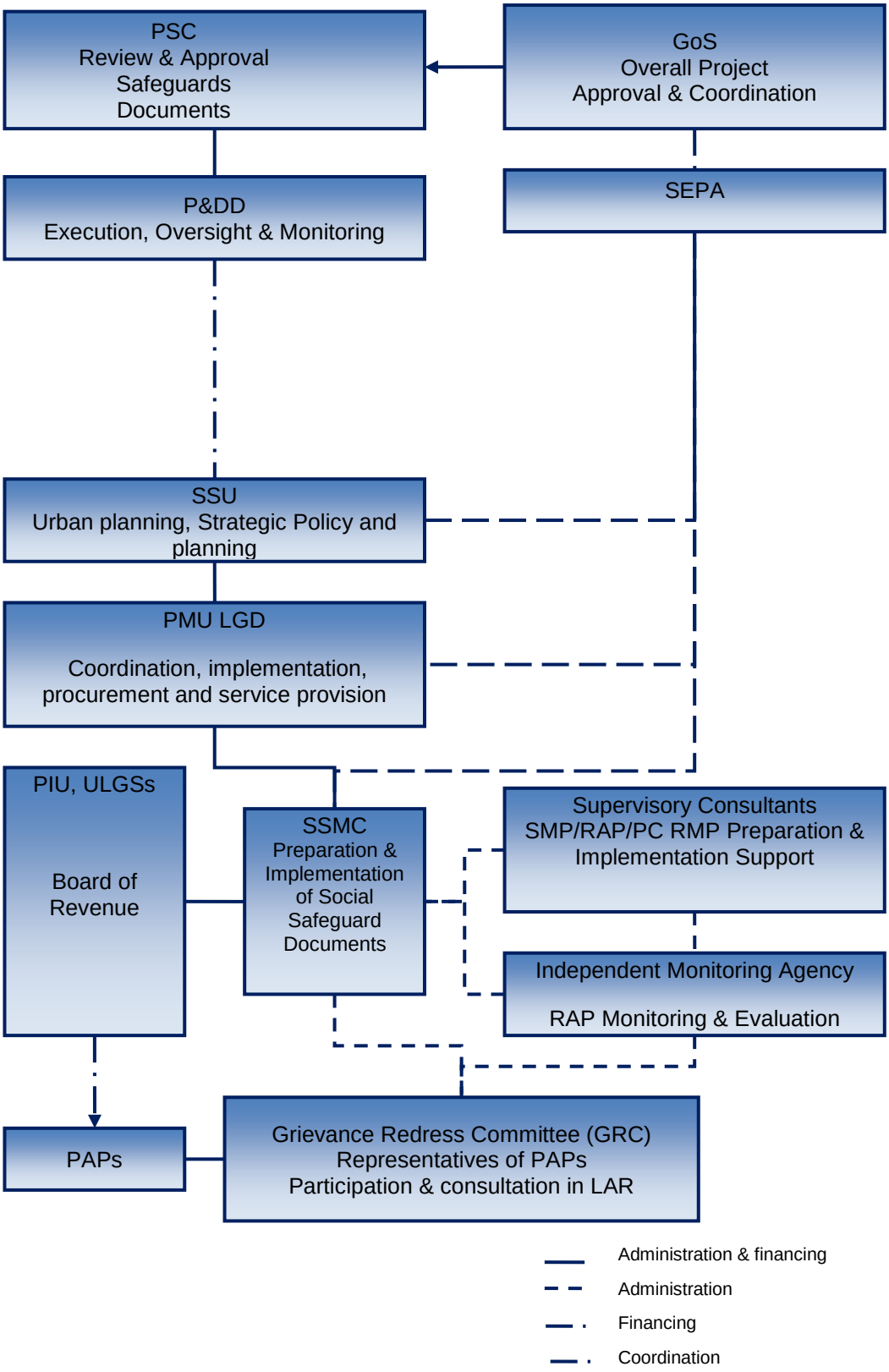


Figure 13: Institutional Setup for Project and Social Safeguard Implementation

13 MONITORING AND EVALUATION MECHANISM

13.1 Introduction

506. Monitoring and Evaluation is an integral part of the social safeguard management process that primarily aims to provide the project management and stakeholders with early signals of progress in achieving the desired objectives. It also identifies gaps and thus helps in rectifying any problems with an ongoing subproject. It is primarily required to ensure proper and timely implementation of social mitigation measures identified in the planning stage, based on the SMF.

507. Monitoring and evaluation will be undertaken at the CLICK implementation phase to verify the effectiveness of impact management, including the extent to which mitigation measures are successfully implemented. The overall aim of the subproject monitoring will be to ensure that the CLICK is implemented in such a way that eliminates, or at least mitigates negative social impacts in real terms relative to their pre-subproject levels.

508. The key objectives of monitoring would be to:

- check the efficiency and quality of the social assessment processes;
- establish the scientific reliability and credibility of the SA for the project;
- provide early warning information for unacceptable social conditions;
- ensure that the mitigation measures proposed in the social management plans are implemented satisfactorily;
- assist in identifying additional mitigation efforts needed or where alteration to the adopted management approach may be required;
- afford the opportunity to report the results on safeguards and impacts and proposed mitigation measures implementation; and
- improve social management practices.

509. To attain the aforementioned objectives, monitoring should be involved at two levels — internal and external. The purpose of these monitoring activities is to ensure the implementation of safeguard documents (SMF/SIA/SMP, PCRMP and RAP/ARAP) in a timely manner, in accordance with the procedures described in the SMF, and in compliance with the national as well as WB safeguard policies.

13.2 Internal Monitoring

510. Internal monitoring is essential to understand the impacts of sub-project interventions and to assess the implementation status of social risk mitigation measures. Internal monitoring of safeguards activities will be a routine activity of the SSMC as part of the project performance monitoring system. The social safeguard tasks will be given to supervisory consultants in the contract specifications and will be monitored to ensure that works are proceeding in accordance with the laid down mitigation measures. In addition to the procurement off required staff, the supervisory consultants will develop and implement safeguards monitoring procedure with input, output and process indicators, field level data collection and computerized data entry in the subproject data base. Safeguards data will be communicated

in monthly briefs of the SSMC to all relevant officers of the PIU to facilitate the supervision and adaptation of safeguards implementation work.

511. The SSMC staff will make regular field visits to monitor the SIA/SMP, PCRMP and RAP/ARAP implementation activities in line with the procedures and guidelines provided in this SMF and RPF. Among the activities and processes to be verified are (i) the information campaign and consultations with PAPs and other stakeholders; (ii) land acquisition and compensation payments; (iii) selection and distribution of replacement land; (iv) compensation for affected structures and other assets; (v) relocation of PAPs, if required; (vi) compensation for loss of income; and (vii) income restoration/substitution.

512. The investigation methods may include (i) the review of census information; (ii) consultation and open-ended interviews with APs; (iii) in-depth case studies; (iv) sample surveys of PAPs (based on the initial socio-economic survey as a baseline); (v) key informant interviews and (vi) public community meetings. All data collection and analysis will be sex disaggregated.

513. SSMC will also assess the compliance status of safeguards documents prepared by the supervisory consultants with respect to the national regulatory and WB safeguard policy requirements. The monitoring results will be compiled in the form of monitoring reports.

514. SSMC will ensure that the supervisory consultants submit reports on work progress on time, and highlight any challenges in implementing the social safeguards. The monitoring results should form a major part of the reports to be submitted to the SEPA, SSU and World Bank. There should be collaboration between LGD, LCs and other line departments to compare social safeguards mitigation plans guiding the individual subprojects implementation to ensure comprehensive management of social impacts.

13.3 Independent Monitoring/Third Party Validation

515. Third Party Validation through an Independent Monitoring Agency (IMA) is essential to objectively evaluate the degree of success or failure of mitigation measures at regular intervals of the subproject implementation. It will help in course correction and highlight any improvements needed in the execution of the mitigation measures, which are the social commitments provided in the SMF to be agreed on and implemented by the IA. The IMA will develop monitoring and evaluation indicators for the study on the basis of the SIA/SMP, PCRMP and RAP/ARAP in compliance of the national regulations as well as WB policies to:

- Ascertain any changes in baseline conditions;
- Identify whether recommended mitigation measures have been successfully implemented;
- Highlight reasons for unsuccessful mitigation; and
- Develop and recommend alternative mitigation measures or plans to replace the unsatisfactory ones.

516. The IMA will share and discuss the independent monitoring design with SSMC. Among the tasks of the external monitoring process will be to: (i) review and verify the internal monitoring reports of SSMC; (ii) review the socioeconomic baseline surveys; (iii) identify and select impact indicators; (iv) assess impacts trough quantitative and qualitative surveys ; (v) consult with local stakeholders; (vi) assess the effectiveness, efficiency impact and

sustainability of the social risks mitigation process for each subproject; (vii) recommend social risks process modification and adaptation measures; and (viii) document lessons learned for future safeguard policy formulation and planning. All data collection and analysis will be gender disaggregated.

517. In particular, IMA will focus on (i) the status of affected vulnerable people; (ii) the socioeconomic pre and post-resettlement conditions of PAPs, including changes in their standard and quality of living; (iii) perceptions of the PAPs regarding the LAR process implementation; (iv) the effectiveness and fairness of valuation and both compensation assessment and disbursement; (v) the effectiveness and fairness of grievance redress mechanisms; and (vi) the level of satisfaction among PAPs in the post-resettlement/compensation period.

518. The Bank may hire a CSO to be engaged by the Bank specifically for anti-encroachment drive issues.

519. Independent monitoring will be carried out bi-annually during the implementation of SMF covering SIA/SMP/RAP, PCRMP and its results will be reported to the PIU, SSU and WB in semi-annual reports.

13.4 Post-implementation Evaluation

520. The IMA will carry out a post-implementation evaluation on the basis of the socio-economic baseline surveys approximately a year after the completion of each sub-project in order to ascertain whether the sub-project was able to implement the objectives and provisions of the SMF. In case of a shortfall, the IMA will recommend enhanced measures. The challenges encountered and lessons learnt can be used to improve the SMF future performance.

13.5 Monitoring Indicators

521. Following are the select key Monitoring & Evaluation Indicators that will guide the monitoring process in CLICK project.

13.5.1 Performance Indicators

Livelihood Restoration

522. In the project where displacement of population is involved, following components will be monitored on periodic basis. The major impact associated with displacement is the loss of livelihoods which require to be restored for the affected population. The following indicators will be monitored periodically:

- Change in Income;
- Livelihood training;
- Gender Issues;
- Ongoing avoidance of resettlement impact;
- Records of any grievances lodged, including resolutions;
- Any changes in household information for affected households;

- Updated records of consultations (both public and individual) with affected households;
- Status of agreements with affected households,
- Changes in costing/procurement; and
- Status of compensation/implementation of remedial works actions.

Labor standards at campsite

523. Labor camps are provided by the contractors for their migrant labor, which includes operators. The labor standards at campsite with respect to the provision of basic facilities and maintenance will be checked visually on monthly basis through the use of relevant checklists.

13.6 Reporting

524. Reporting on progress, achievements and problems encountered in the implementation of this SMF will be documented in the subproject quarterly and annual progress reports. Until the SMPs and stand-alone management plans are put in place, the SSMC will be responsible for compiling reports on the implementation of this SMF, for reporting to the SSU and PSC of CLICK. Key issues will be presented to the PSC during each committee meeting.

525. The quarterly and annual reports shall include the following key information:

- An introduction, reporting period and monitoring locations;
- Scope of works and status of implementation of activity being reported;
- SMF management actions undertaken during the reporting period;
- Progress to date in implementing the SMF, including key aspects monitored: R&R components, livelihood restoration, employment of local population, women employment (%), change in income, community health and safety practices, grievance redress, social awareness and training undertaken, etc.
- Key recommended issues that require follow up, specific actions, time frames and responsibilities.

13.7 Social Monitoring Plan

526. To assist in the implementation of identified mitigation and monitoring strategies, social monitoring plans will be developed for each subproject that cover all essential aspects of social safeguards related to the CLICK project cycle. The monitoring plan shall also identify the key indicators of social impact. The plan shall provide a schedule for monitoring each indicator and for reporting the monitoring results to PMU. It will also identify the management roles and responsibilities for ensuring that monitoring is undertaken, results are analyzed and any necessary amendments to practices are identified and implemented in a timely manner.

527. In addition, a sample social monitoring plan has been prepared based on social tasks involved at different stages of the sub-project cycle. The aim of the social monitoring plan is to measure the progress in activity implementation as well as the extent to which the activity will result in changes in accordance with the objectives. The monitoring action plan is outlined

below in **Table 23** covering various performance indicators, frequency and institutional arrangements.

Table 23: Social Monitoring Plan

Monitoring Activity & Relevant Projects	Description	Frequency / Timeframe	Expected Action	Roles and Responsibilities
Track progress of SMF implementation including all subprojects supported under CLICK.	Implementation of this SMF coordinated for each subproject, and with results reported to PMU and WB on bi-annual basis.	Quarterly	Required SMF steps are completed for each of the subproject in a timely manner.	SSMC
Development of SIA and report, and SMP for subprojects.	To be carried out in a participatory manner, in-depth analysis about potential social and impacts, as well as identification / validation of mitigation measures.	Quarters 1 and 2 of project implementation	Risks and potential impacts are assessed with support of supervisory consultants and participation of project team and stakeholders; management actions identified and incorporated into subproject implementation strategies.	Supervisory consultants with guidance from SSMC
Implementation of mitigation measures and monitoring of potential social impacts identified in SIA and per the subsequent SMP for subprojects.	Participatory monitoring of permanent and temporary impacts and mitigation measures, in accordance with SMP (to be prepared together with SIA)	Continuous, once SIA is completed and SMP is in place	Implementation of SMP; participatory monitoring of SIA findings, (i.e., identifying indicators, monitoring potential impacts and risks); integration of SMP into subproject implementation strategies. Monitoring of social risks, and corresponding management plans as relevant (tendered to IMA)	SSMC Unit of PMU
Development of social assessment and report, and livelihoods action plan as needed	Carried out in a participatory manner, analysis of potential livelihood impacts associated with subproject establishment/ enhanced management, as well as identification / validation of mitigation measures, drafted in participatory manner	Quarters 1 and 2 of project implementation	Potential social impacts related to economic displacement of PAPs are assessed with support of supervisory consultants and participation of APCs; if justified based on findings of social assessment, a livelihoods action plan will be developed; management actions will be identified and incorporated into project implementation strategies.	SSMC With support for supervisory consultants and PAPCs

Monitoring Activity & Relevant Projects	Description	Frequency / Timeframe	Expected Action	Roles and Responsibilities
Implementation of management measures and monitoring of potential social impacts identified in SIA	Implementation and monitoring of management measures, in accordance with findings of SIA (and livelihoods action plan if developed)	Ongoing Management plans are in place after assessment.	Implementation of stand-alone management plans; participatory monitoring; integration of management plans into project implementation strategies.	SSMC and supervisory consultants
Continuous learning for improvement from all subprojects	Good practices and lessons learned regarding social risk management will be captured regularly.	On annual basis	Relevant lessons are captured by the SSMC and used to inform management decisions.	SSMC and management of LCs
Annual project quality assurance for all subprojects under CLICK	The quality of the project will be assessed against WB's quality standards to identify project strengths and weaknesses to improve the subproject.	On annual basis	Areas of strength and weakness will be reviewed and used to inform decisions to improve project performance.	SSMC and management of LCs
Review and make course corrections of subprojects under CLICK	Internal review of data and evidence from all monitoring actions to inform decision making.	On annual basis	Performance data, risks, lessons and quality will be discussed by the SSU and used to make course corrections.	KMC, Project Director, SSU and stakeholders' opinions
Project reports of all subprojects under CLICK	As part of progress report to be presented to the SSU and key stakeholders, analysis, updating and recommendations for risk management will be included.	On annual basis	Updates on progress of SMF/SMP	Project Director, SSMC with support from supervisory consultants.
CLICK review	The SSU will conduct regular project reviews during which an updated analysis of risks and recommended risk mitigation measures will be discussed.	On annual basis	Any risks and/ or impacts that are not adequately addressed will be discussed in project steering committee. Recommendations will be made, discussed and agreed upon.	Project Director, SSMC with support from supervisory consultants.

14 CAPACITY BUILDING FOR SAFEGUARDS COMPLIANCE

14.1 Institutional Capacity and Development

528. Capacity building is a critical element for institutional strengthening. For effective implementation of SMF, it is imperative to build the capacity of IAs with required skill sets to achieve desired goals. In the present context, while implementing complex subprojects in the urban areas, the IAs may encounter various problems in planning, implementing and managing social issues, including the need to mitigate and manage adverse impacts. The IAs also need to understand inherent social issues and to build its capacity to address those that arise in a typical project cycle.

529. Effective SMF implementation depends on the capacity and commitment of the agencies responsible for social safeguard's planning and management. LCs have very little or no experience of implementing an investment project financed by an international donor. Whereas KMC has a strong engineering team, an institutional assessment highlights that at present the institutional capacity of LCs is insufficient to manage environmental and social safeguard requirements of the CLICK project in line with Bank policies. The capacity of LCs to manage social risks, including engaging citizens in the process of project design and implementation, is low. Additionally, the lack of: enabling country social and environmental management systems; national and provincial policy and legislation on involuntary resettlement and rehabilitation; and, weak enforcement of labor laws are the main bottlenecks to streamline the social safeguards system in the LCs working.

530. In view of the above, LCs requires an enabling environment together with resource capability to be able to manage and monitor social safeguards. Therefore, under the investment program, LCs need to build safeguards management capacity by (i) inducting additional qualified and dedicated resource for management of safeguards for IFI financed projects, (ii) plan and implement capacity development program for LC staff for their better understanding of the project-related social issues and LAR management; and (ii) to strengthen the role of PIU in implementation of mitigation measures and subsequent monitoring.

14.2 IA's Capacity Building Requirements for the SMF

531. The organizational capacity needs assessment recognizes existing gaps and weaknesses in LCs with regard to effectively implementing the social safeguards under the CLICK project. Sufficient knowledge on social management principles, subproject screening, impact mitigation, monitoring and follow-up action is limited within LCs. Strengthening and building the capacity of these organizations will be critical to the success of the proposed Project.

532. CLICK aims to substantially strengthen environmental and social safeguards capacity of LCs and these measures are based on the findings of an institutional and capacity assessment conducted during project preparation. Specifically, the project will incentivize the improvement of environmental and social management for LCs through the use of minimum access conditions and performance grants mechanisms. These will support institutionalization and strengthening of social and environmental management systems and capacity in the ULGS.

533. Further centralized capacity building support will be provided from the SSMC in the LGD PMU. The project will also invest in strengthening social safeguards focal points at all LCs.

534. The capacity development will strengthen implementation of SMF and ensure that social issues are addressed as required. It will also build the capacity of all institutions who will be

involved in the implementation of SMF and RAP/ARAPs, PCRMP and other social safeguards instruments. Capacity building initiatives will also ensure compliance with the requirements of national regulations and the Bank's safeguard policies.

535. Capacities for managing social tasks need to be built considering the overall institutional development in addressing social issues as well as subproject-specific capacities that are useful in implementation of the subproject. Accordingly, an institutional capacity development strategy and project specific capacity plan should developed by the IAs which specifically identifies the shortcomings in the capacities at different levels and suggests relevant measures to overcome them. In order to build commensurate capacity for effectively implementing the SMF for the CLICK project, all the key actors will need to understand and appreciate its relevance to the project as well as the specific components to which their roles and responsibilities are highlighted (refer to **Section 13**).

14.3 Training

536. Training is an important component for developing capacity. Appropriate and timely training to the officials with regard to various issues can bring a positive change in the functioning of the staff. Apart from training in generic areas such as human resource management and information management, government functionaries require training in handling certain specialized tasks pertaining to social issues and their impacts on people. As a part of the capacity building during project implementation, training programs should be conducted on social safeguard policies, and on how to prepare and implement both safeguard planning and monitoring instruments.

537. At the subproject site, training will focus on awareness about safeguard requirements among the staff who will be involved in activities related to implementation of subprojects. Training programs organized for such purposes should typically include topics necessary for carrying out SMF assessment and those related to the structure of the SMF. They should be designed to improve knowledge and ability to deliver social support across subprojects at all implementation levels.

538. Trainings can be in the form of programmed trainings, seminars, workshops or knowledge forum exchanges. The SSMC staff will provide regular awareness training and refresher training to all the staff of the CLICK project, line departments, supervisory consultants and CSOs involved in the implementation of SMF.

14.4 Thematic Areas of Training

539. The training program will focus on various topics relevant to the social management process. This will be accomplished by organizing awareness raising/sensitization programs, hands-on workshops (on application of SMF), training programs related to technical and thematic areas related to social issues in subproject implementation.

540. Training on Social Assessment of subprojects will enable IA staff to understand the social risks attached to different subprojects and the appropriate measures that can be taken to mitigate adverse impacts on the community. This would not only enable them to prepare socially sound subprojects but also help them put in place strong monitoring and management plans.

541. Training on Resettlement and Rehabilitation is another very essential requirement for the project staff in addressing social issues. This could include information on related laws and legislations, safeguard policies, methods of implementation, valuation of assets, grievance resolutions, preparation and implementation of Social Management Plan (SMP, RAP, RCRMP

etc.), that may be encountered in typical urban infrastructure subprojects. Staff in the LCs need to build capacity in this regard. Functionaries who are especially involved in planning and developing subprojects should undergo this training as they play a primary role in implementing R&R provisions under the project.

542. The topics of training on social issues would pertain to, but not be limited to, the following table with a general list of thematic areas /activities involved in a subproject investment, for which the capacities need to be strengthened. **Table 24** describes topics and thematic areas, which can be adjusted according to the training needs assessment.

Table 24: Thematic Areas and Training topics

Thematic Areas	**Training Topics and Capacities required**
Project Context and Rationale for SMF	• Overview of CLICK, selected subprojects and likely activities • Identification of Infrastructure problems and social sensitive issues • Basic social concepts and issues • Preparation of or the SMF • Likely social impacts of subproject activities • Relevance of the SMF in addressing likely impacts • Guiding principles of the SMF • knowledge and understanding of Policy, Legal and Institutional Framework • Legal/regulatory framework of environmental issues for urban sector projects • Integration of subproject SMPs and RAPs into CLICK's cycle during their implementation stages
Social Screening and Assessment	• Identification of social impacts • Social screening of subprojects • Social assessments of subprojects • Screening and Categorization of the subprojects • Primary and secondary data collection through surveys, consultations, studies/reports pertaining to the intervention area.
Social Management and Monitoring	• Social Management planning • Key parameters for the Planning process and monitoring mechanisms • Incorporating the SMP and associated costs in to the bid documents. • Implementation of the mitigation measures at the design, construction and monitoring stages of the subproject. • Monitoring the subproject investments during construction and operation. • Design of monitoring indicators for the subproject mitigation measures • Quality assessment and monitoring the contractor's work for the implementation of mitigation measures • Social monitoring during construction and operation

Thematic Areas	Training Topics and Capacities required
Resettlement Action Planning	• Rationale of Resettlement Action Planning • Land Acquisition Act (LAA, 1894) with Amendments and WB OP 4.12 • Key principles, procedures and gaps between the WB policy and LAA • Resettlement Tools, Socio-economic Survey, Census Survey • Entitlement matrix and Inventories • Livelihood impacts • Vulnerability and Gender Issues in Land Acquisition and Resettlement • Asset valuation, Income Restoration and Rehabilitation • Replacement Cost Survey and Pricing • Prioritization of problem issues with respect to severity of social impacts • Physical Relocation • Preparation of a RAP/ARAP
Consultation, Participation and Grievance Redress	• Conducting Public consultations and FGDs • Stakeholder Identification, Mapping • Information Dissemination, Consultations • Community mobilization/participation and social inclusion • Addressing Public complaints and Grievances • Coordination with the concerned departments in designing the sub projects for sustainable solutions to the infrastructure problems • Procurement of social related data of the sub-project intervention area through consultations.
Resettlement implementation and monitoring	• Institutional arrangements • Costs, Budgeting and Financing of Land Acquisition and Resettlement • Internal Resettlement Monitoring • Resettlement Plan Implementation • Resettlement External Monitoring • Monitoring Issues related with R&R assistance

543. Training programs should be conducted according to an annual training plan to impart skills for implementing SMF, to update stakeholders on external changes (legal requirements, safeguards, etc.) and for operational experience-sharing, and to communicate revisions carried out in the SMF. The training programs should clearly designate the intended audience, responsible implementers and estimated costs along with the timing of the activities.

544. As discussed in the Institutional Arrangement, **Section 13,** PMU will be responsible for implementation of the SMF, RAP/ ARAP, therefore basic training on regulatory requirements, social impacts, and social assessment and management would greatly improve the capability of relevant technical staff in carrying out their responsibilities under the proposed CLICK project. Training for the relevant officials may be arranged at project level. The training in various social issues and exposure to best practices in social management will make the IAs, supervisory consultants, contractors, communities, NGOs, and key stake holders sensitive to social issues.

545. IAs will allocate sufficient budget annually to implement the above activities. Institutional strengthening capacity plan will be part of the CLICK Annual Work Plan, and accordingly budget to implement such plan will be part of the annual budget plan.

546. PMU will maintain records of the institutional capacity strengthening, detailing the training programs, agenda comprising topic, duration and trainer, qualifications of the trainer for conduct of training, and attendance sheet of participants. Training content should also be maintained and updated as required. Similar records will have to be maintained for workshop, seminar, outreach, etc. that have been attended by the SSMC staff.

15 BUDGET FOR SMF IMPLEMENTATION

547. The capacities needed to address the safeguards implementation aspects of CLICK as described in **Section 14**, including the capacity building and staffing for safeguards are incorporated into the Project costs to ensure that the institution involved in the implementing of different components of SMF has the technical, managerial and other skills to perform its role and responsibilities efficiently and in a timely manner.

548. The budget of the SMF will cover among others, activities ensuring the implementation of the SMF. It will also cover the staff for SSMC in PMU of the estimated five years of the project duration. The SMF provides for capacity development of the LCs and SSMC in social management in subproject cycle.

549. Based on the social scan of the potential project sites, it is likely that the project, during implementation affects peoples permanently or temporarily. The project may also need to compensate for physical structure or replace them where affected to make available lands for infrastructure improvement works. Land acquisition under **Component 1, if required,** will be done by the IAs with resources provided by the GoS. The cost of resettlement compensation (e.g. compensation for economic livelihood) will be an eligible expenditure under the capital grant provided by the project, in order to mitigate risk of delay and response to compensation requirements.

550. The project will provide financial support for social management capacity building for PIUs in LCs, PMU, SSMC, contractors and those stakeholders who will be involved in the implementation of SMF.

551. The SMF, has therefore, includes an indicative budget of PKR 685.66 million for social risk mitigation, staff for SSMC, Independent monitoring/Third Party Validation and contingencies. The estimated costs are indicated in **Table 25** below.

Table 25: SMF Budget (Indicative)

Description	Unit Rate (Million PKR)	Quantity	Budget (Million PKR)
SSMC Staff in PMU			
Social Development Specialist	0.30	84	25.2
Social & Gender Specialist	0.30	84	12.6
Social Mobilizer (Male and Female)	0.06	126	7.56
Social, Resettlement and Gender Specialist in PIUs	0.30	588	176.4
Training Capacity building	0.60	30	18.0
Third Party Validation	3.00	7	21.0
Social Risk Mitigation Cost*	50.00	7	350.0
Sub Total			**623.36**
Contingencies 10 %			62.3
Total			**685.66**

*Not more than 2% of total project costs.

552. The IAs will allocate sufficient budget to cover training costs. The project will finance the cost of supporting SSMC Personnel, i.e., a Social Development Specialist , a Social and Gender Specialist and two community mobilizers in addition to focal person in the PIU. The SMF cost

also includes the Third Party validation of the subprojects. In addition, the project will finance training workshops for IA staff and eligible contractors. Furthermore, the supervision consultants and the contractors shall share the project implementation plans including any specific actions that will take place during construction such as vehicular traffic detour plans, temporary interruption of water and electricity supplies, etc.

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Appendix 1: Resettlement Policy Framework

RESETTLEMENT POLICY FRAMEWORK

Competitive and Livable City of Karachi (CLICK)

May 2019

Local Government Department
Government of Sindh

1 INTRODUCTION

1.1 The Resettlement Policy Framework (RPF)

The development of a RPF is a requirement for projects that may entail involuntary resettlement, issues of compensation, impact on livelihood, or restricted access to natural resources under the World Bank safeguard policy on involuntary resettlement (OP 4.12) and this RPF will be used as a policy and procedure document for preparing the safeguards instruments related to involuntary resettlement when the footprints of the sub-projects will be identified during implementation. In addition to meeting World Bank requirements, the RPF defines the legal and policy framework, eligibility criteria and entitlements for project affected persons (PAPs) to ensure fair and timely compensation, relocation and rehabilitation. It also sets out procedures for subproject screening and categorization; social impact assessment, consultation, participation and disclosure; grievance redress; monitoring and reporting; and, the institutional and financial arrangements for the subproject implementation.

This RPF, prepared by the Implementing Agencies (IAs), fulfils OP 4.12 requirements pertaining to resettlement policy, principles, objectives and implementation procedures and complies with pertinent national laws and regulations (e.g., Pakistan's Land Acquisition Act of 1894, and Provincial Rules, Regulations and Guidelines) for land acquisition and resettlement. The IAs are responsible for RPF application and implementation in all subprojects that have resettlement impacts and require preparation and implementation of RAPs/ARAPs.

The RPF describes in detail the context, design and risks associated with the CLICK project. Second, it summarizes: (i) measures that have been built into the project design to avoid risks in the complex context of Karachi; and (ii) multiple layers of risk mitigation measures that have been put in place to further reduce the environmental and social risks associated with the project.

1.2 Overview of CLICK Project

The **Project Development Objective** is to improve urban management, service delivery and the business environment in Karachi. Karachi faces substantial challenges on all these fronts, which this project cannot alone fully resolve and will only begin to address by selectively tackling critical current bottlenecks. Activities under all components will set foundations and put the city in a long term path towards adequate service provision and a competitive business environment, which is not expected to be fully achieved by the end of the project.

The detailed LAR scope and impact severity for each identified component is given below.

1.2.1 Component 1: Performance-based Grants to Local Councils and Capacity Building

Component Description: As described in Chapter 2 (Section 2.1) of the SMF.

Component 1 does not require large-scale land acquisition and resettlement. However, some small-scale acquisition of private land may be required (e.g. rights of way). No land acquisition will be done with project funds. If needed, land will be acquired by the government and will be done in a manner consistent with Bank policies and following the provisions of the Social Management Framework (SMF). Subprojects will be designed based on an inclusive process of public consultation and are intended to have positive effects on the target communities by improving livability. Given that most works will be executed in a dense and congested urban environment, they are likely to have only limited and temporary negative livelihood impacts on businesses and individuals during construction (due to restricted access, temporary relocation

etc.) including markets, transporters, mobile vendors/hawkers etc. Compensation of all those impacted will be done consistent with Bank policies and following the procedures outlined approved SMF[86].

1.2.2 Component 2: Modernizing Urban Property Tax Administration and System *(WB financing: US$40.0 million*):

As described in Chapter 2 (Section 2.1) of the SMF.

1.2.3 Component 3: Improvement of City Competitiveness and Business Environment *(WB financing: US$20.0 million)*

As described in Chapter 2 (Section 2.1) of the SMF.

1.2.4 Component 4: Technical Assistance for Solid Waste Management (WB financing: US*$10 million)*

As described in Chapter 2 (Section 2.1) of the SMF.

1.3 Environmental and Social Risks of the Project

While the project's infrastructure sub-projects financed under Component 1 are small in scale and are not expected to cause any long term or irreversible environmental impacts, the capacity of the Local Councils (LCs) to apply the relevant safeguards instruments in a satisfactory manner is low, (such as Environmental Management Framework (EMF), SMF and Environmental Management Plans (EMPs)).

To avoid *environmental risks*, capital infrastructure sub-projects under Component 1 will exclude high-risk subprojects with significant negative environmental or social impacts that are sensitive, diverse, or unprecedented. To screen for these exclusions, the project will rely on a positive list, coupled with an exclusion list. Adverse environmental impacts identified will be avoided through environment impact screening, and, design and implementation of EMPs for selected subprojects. All subproject ESMPs will be prepared by LCs and reviewed and cleared by the Bank before the sub-projects are implemented.

To address *social risks*, managing risks associated with the judiciary led anti-encroachment drive will be critical during the project implementation. A major anti-encroachment drive (AED) was initiated in the city in October 2018 on the order of the Supreme Court of Pakistan, and it is underway across the city. The Court ordered the removal of encroachments from public spaces (parks, footpaths, amenity plots, etc.) across the city of Karachi, to be implemented by KMC and other civic, local and law enforcement agencies. There is not publicly available future plan that indicates how the AED is to be conducted, i.e. what locations will be targeted or when, and multiple agencies are involved in the eviction process.

There are several project-level risks associated with the ongoing anti-encroachment drive, which have been addressed, upfront, in the design of the project and will be avoided through a comprehensive set of Project Risk Reduction Procedure (PRRP) which is described below.

[86] Compensation for loss of livelihood, either due to temporary relocation of street vendors or to permanent relocation resulting from limited land acquisition (financed by the government), may be an eligible expenditure under the CLICK project. Discussions are still ongoing with the government and a final decision will be made by Appraisal. In the event this type of expenditure is considered eligible under the CLICK, a memo to the RVP requesting approval will be prepared. The compensation for loss of livelihood will be done following all the requirements and the procedures of OP 4.12.

1.4 Overview of the Anti-Encroachment Drive

Land use and management in Karachi, including control and ownership, is complex and institutionally fragmented. State land in Karachi is managed by 13 agencies with no central agency or plan to coordinate between these agencies. The city's land management systems have been weakened due to ethnic issues underpinning the political dynamics of Sindh[87]. Strong tensions between the city (local) and provincial governments, resulting from ethnic differences between the political parties that run these governments, deeply affect the sound management of the city. The provincial and city (local) governments are controlled by different political parties often representing different ethnic identities. Institutional fragmentation leads to very limited, if any, coordination on issues of city governance, financing and planning and service delivery, including land management. GoS the provincial government) has substantial control of municipal services and in the recent past has taken over an increasing number of key municipal / urban functions from local governments, especially in Karachi.[88] In addition, three major political parties are now vying to maintain and further extend their power and control over various institutions. A fractured and weak land management and governance regime has facilitated large-scale encroachment of public land across the city over the years.

On October 27, 2018 the Supreme Court of Pakistan issued orders for the removal of encroachments from public spaces (parks, footpaths, amenity plots, etc.) in Karachi. The Court ordered that civic and law enforcement agencies support the Karachi Metropolitan Corporation (KMC) to remove encroachments "inside and outside Empress Market, the surrounding areas (including Saddar) and public footpaths" and "in and around the public parks" within three weeks. Reportedly, over 3,500 shops were demolished, and several vendors and hawkers were evicted without compensations. The anti-encroachment drive did not only affect informal and illegal vendors. In fact, many shop owners were in possession of leases issued by KMC, and they were also evicted. The eviction drive continues to date led by the KMC, and there are plans to clear encroachments across the city. As the Supreme Court continues consideration of the case, interim orders have been issued to civic authorities requiring "uninterrupted" continuation of the anti-encroachment drive so Karachi can be "seen as clean and green as it was in the past". A provincial government review petition urging the Court to reconsider its decision - on humanitarian grounds and given a high risk of social conflict - was turned down. In the meantime, some hawkers, particularly mobile vendors, have started returning to cleared areas. The drive has affected thousands of small businesses, street vendors and hawkers. The response from media and civil society has been strong[89].

KMC is making efforts to relocate affected shop owners by the anti-encroachment drive: about 1,462 shop owners out of estimated 3,000 shop owners (who have been paying rental fees) have been allotted new shops, through a balloting process, and can be accommodated in different

[87] The issue of land has a strong ethic dimension as *mohajirs* or Urdu speakers - original migrants from India at Independence in 1947, and, Pakhtuns, the two current dominant ethnicities of the city, and Sindhis and Baloch, the original but now minority ethnic inhabitants of Karachi, contest over space in the city.

[88] These include the following municipal functions: master planning; land use and building control; mass transit; water & sewerage, slum regularization; and most recently solid waste management. Urban property taxes—typically a large source of revenues for local governments elsewhere—are also collected by provinces across Pakistan, with revenue then subsequently transferred to local governments.

[89] The Bank was initially implicated in the anti-encroachment activities given that an ongoing project, the Karachi Neighborhood Improvement Project, is financing investments in areas neighboring those where evictions have taken place. However, no evictions have taken place within the footprint of the Bank project, and this has been clarified to the government, area residents, and civil society. Bank teams met with Government, civil society and media to clarify the Bank's position and its safeguards policies. The Bank also initiated discussions with the Government and offered to provide its support for improvement of government systems for removal of encroachment and resettlement in a socially inclusive manner.

locations. More recently, the Cabinet of the GoS approved a proposal to identify ways and means to accommodate shop-keepers whose shops had been affected under the AED. While details on the proposal have yet to be reviewed, these actions are consistent with the dialogue that the Bank has had with the GoS that acknowledged limitation of the AED and showed an interest in minimizing the adverse impact on AED affectees, particularly the poor and vulnerable groups

The Government does not have a forward-looking plan of how the AED will be carried out in the future, i.e. what areas will be targeted, in what order and when, for the continued removal of encroachment. The Court, in the meantime, continues to issue instructions. Following the hearing on January 22, 2019, the Court noted that "there seems to be an epidemic in the city of marriage halls, shopping malls, petrol pumps/CNG stations and the houses are being allowed to be converted for these purposes", ordering the Director General of the Sindh Building Control Authority to "take steps to have all [amenity] plots which were originally meant for residential purposes, amenity plots and playgrounds and restore them to original position and remove all illegal and unlawful construction on such plots". Further the Court imposed "a complete ban on Master Plan Department of Sindh Building Control Authority or any other authority of the City Government or GoS of allowing change in the use of land.", and that this ban "shall apply all across Karachi City including Cantonment areas".

The conduct of the AED is not in accordance with the Bank's policy on involuntary resettlement (OP 4.12) as there are no provisions to compensate or rehabilitate squatters, vendors and hawkers who have been displaced nor provide compensation for loss of livelihood. Standard practice of KMC and other GoS agencies in eviction of squatters and encroachers on public lands also does not meet the requirements of Bank policy.

Mapping of the AED carried out by KMC until February 2019 (see attached map) suggests that the drive has been concentrated in South District, the city's center for business and commerce, followed by Central and Korangi districts. There have been fewer activities in other districts, which are mostly residential areas. The types and extent of interventions carried out under the anti-encroachment drive vary from removing signs of stores that are protruding into public space, to clearing informal structures and evicting vendors[90] (see **Table 1**). The anti-encroachment drive has been carried out solely on commercial activities - the GoS has stated in numerous occasions that residential structure/areas cannot be impacted under the current drive.

Table 1: Typology of structures and/or non-structures removed or affected by AED activities

No.	Type
1	Illegal shops/cabins
2	Sunshades
3	Illegal walls and wall fixtures
4	Extended portions (of shops, hotels, cabins, marriage halls)
5	Marriage halls/fitness centers/buildings/illegal construction on green belts and plots
6	*Chabotras* (paved terrace, raised platform) and foot steps
7	*Thailay* (pushcarts)/patharay (selling on rug, or table counter)/counters, misc.

[90] Task team is working on a more disaggregated mapping based on types of intervention

Stakeholder consultations that have taken place with civil society suggest there is no clear consensus/position towards the AED. Some stakeholders have been critical of the Court decision, arguing that the marginalized and vulnerable population was unfairly affected, and their view was not properly accommodated. On the other hand, other stakeholders have highlighted a need to protect public space, pedestrian right, and to conserve cultural heritage that has been damaged by prevalent encroachment. Some take the strict view that encroachment is a manifestation of a state of lawlessness in which public land is used for private benefit. A need for better land use planning and de-concentration of urban centers for commercial activities has also been highlighted. Stakeholders systematically converge on the point that implementation of anti-encroachment drive should be improved.

1.5 Key design elements and mitigation measures to address risk associated with AED

The following sections describe the multi-layer approach that has been designed under the CLICK to avoid the risk that interventions financed under the project take place in areas previously impacted by the AED. No areas impacted by the AED prior to the start of the project are eligible for financing. The risk avoidance and mitigation approach is built upon the premise that, in the future and once the project is under implementation, if AED- actions are to be carried out by the government in areas that have been selected for financing under the project (i.e. within the footprint of sub-project areas), the government will comply with all the provisions of the Bank's safeguards policies, as specified in the safeguards instruments.

1.5.1 Addressing project-level risks

Measures have been built into the project design to avoid and address project-level safeguards risks, in order to ensure compliance with the Bank's OP 4.12. A detailed procedure, the Project Risk Reducing Procedure (PRRP) has been agreed with the Government to avoid project-related risk. The PRRP is explicitly outlined in the Project Implementation Manual (PIM) and referred to, by name, in the Legal Agreement, in order to emphasize its singularity and its importance in the complex environment of Karachi.

First, the PRRP will take the approach of screening out areas that have been impacted by the AED by incorporating a screening mechanism as part of the eligibility criteria of sub-projects to be financed under the CLICK. Only sub-projects' actual construction sites plus associated zones of impact located in areas that have not been impacted by the AED are eligible for financing under the CLICK. This will ensure that only sub-projects that meet the standards and conditions of the Bank's policy on involuntary resettlement will be financed. This involves, amongst other requirements, compensation and rehabilitation of livelihood of affected people including persons without land title, squatters, vendors, hawkers, etc. in accordance with the entitlements prescribed in the Project's RPF and any subsequent Resettlement Action Plans (RAP).

Second, under the PRRP infrastructure sub-projects will be reviewed and approved for safeguards requirements before LCs can commence their work, to ensure that sub-project sites comply with the Bank's safeguards policy and standards. Moreover, one of the key objectives of the institutional strengthening supported under the Component 1 includes strengthening social and environmental management capacity of participating LCs. Minimum conditions include basic requirements of social and environmental management, and performance indicators incentivize implementing the Bank's Social Management Framework (SMF)/RPF satisfactory to the Bank. Furthermore, the Project will finance an extensive capacity building program to be implemented by Local Government Department for safeguards preparation and implementation. Robust

communication efforts, Grievance Redress Mechanisms (GRM) and a monitoring system will be supported for the Project. The Bank will also engage with civil society organizations (CSOs) / NGOs to monitor the implementation and progress of works supported by the LCs.

During preparation, the Task Team has agreed with the government on a comprehensive set of measures that include: (a) investment performance measures that restrict access to investment resources until minimum performance thresholds have been reached, including for safeguards management; (b) exclusionary measures based on strict eligibility criteria for subprojects investments (e.g. a negative list); (c) safeguards instruments, including a Resettlement Policy Framework (RPF) and an Environmental Management Framework (EMF), consistent with Bank safeguards policies; (d) prior review and no objection by the Bank of sub-projects to be financed to ensure compliance with defined criteria; (e) extensive capacity building of beneficiary Local Councils (LCs) in the implementation of environmental and social safeguards; (j) mechanisms to ensure coordination across institutions responsible for implementing various aspects of AED; (f) a robust project monitoring system to track the progress of the anti-encroachment drive (AED) and its potential impact on the Project; (g) communications strategy based on detailed stakeholder engagement; (h) a robust GRM system to address potential grievances of affected population; (i) extensive capacity building of local governments; and (j) specific and strict clauses on Legal Agreement providing immediate remedies to the Bank in the event of non-compliance with the project's risk reduction procedures.

The full set of project-level measures designed to avoid safeguards risk and additional mitigation measures are described in detail below.

1.5.2 Project Risk Reducing Procedure (PRRP)

1.5.2.1 Coordination and Monitoring of actions under AED during Project Implementation

Coordination

Several agencies are involved in the implementation of the AED, including KMC, Karachi Development Authority (KDA), and Sindh Building Control Agency (SBCA), among others. The Commissioner of Karachi has been tasked by the Province of Sindh to coordinate different agencies on their ongoing ant-encroachment plans and activities. It was agreed that Local Government Department (LGD), the Bank's main counterpart for component 1 will seek close coordination and liaise with the Commissioner for the AED related activities.

Monitoring of AED

- Government efforts - LGD will take the lead to monitor, map, and regularly update the locations and extent of the AED conducted on or after October 27, 2018, that is, the starting date for the recent AED actions (see below). Monitoring will involve (i) mapping of the locations of the AED, both completed and planned, on a GIS platform building on existing sources; (ii) categorization according to the typology and hierarchy described above; (iii) compensation and relocation of affected people, as applicable; and (iv) the nature and extent of their impact. CSO/research institutes are also monitoring and updating the areas affected by the AED and LGD can consider partnering with these institutes to ensure further validation of the information and enhance transparency.

  KMC is currently making efforts to relocate some of the vendors and hawkers to different locations. The monitoring of AED will document the compensation or relocation of affected people in the future, and the response of people who have been offered such

compensation or relocation (e.g. compensation accepted/rejected, satisfied/dissatisfied with the process, type of compensation offered etc. and the reasons for the response).

- Project-level efforts - A third-party monitoring agent (or a CSO) will be retained by the CLICK team to monitor the sub-project selection process, and implementation and progress of sub-project works by LCs. TA and capacity building activities to improve monitoring of the AED will be provided under the menu of TA activities to be financed under Component 1.

1.5.2.2 Safeguards Instruments

The Project's EMF and SMF has been prepared, consistent with the Bank's safeguards policy requirements. The SMF has been prepared as the exact locations of project interventions have not been determined and will be determined during the process of capital investment planning by LCs. It also includes an RPF to deal with any involuntary resettlement. The RPF includes a two-staged mechanism for social screening of subprojects. In step 1, the screening will determine the interaction of the sub-project with the anti-encroachment drive to determine the eligibility of the project. If determined eligible for the Bank financing, the screening mechanism will determine the types of safeguard instruments to be prepared. The SMF also includes: management frameworks for gender, vulnerability, stakeholder engagement and labor impacts during construction (including gender-based violence (GBV) and sexual exploitation and abuse (SEA)); and GRM. The SMF will inform the preparation and implementation of site-specific Social Impact Assessments (SIAs) / Social Management Plans (SMPs) and (if required) Resettlement Action Plans (RAPs) / Abbreviated Resettlement Plans (ARAP) for subprojects. The SMF has been publicly disclosed, consulted upon with all stakeholders and cleared by the Bank. Similarly, since the nature, degree of impact, exact location and specific design of subprojects to be undertaken by LCs are not known at appraisal stage, a framework approach to environmental management has been adopted. An EMF has been prepared to meet the requirements of local environmental regulations and the Bank safeguards policies and procedures consistent with OP 4.01. It has been publicly disclosed and consulted upon with stakeholders.

1.5.2.3 Screening methodology for sub-project eligibility

A decision tree will be used to screen and select sub-projects under Component 1 to ensure that all provisions of OP 4.12 are met for subprojects financed under the CLICK. This includes compensation of affected people, or rehabilitation of assets of affected people, including persons having structures on land without title, squatters, vendors, hawkers, etc. in accordance with the entitlements prescribed in the RPF and any subsequent RAPs/ARAPs. **A key objective of the screening mechanism is to ensure that areas that were affected by AED on and after October 2018 are excluded from eligible locations under the Project.** Detailed screening criteria are described in the RPF, summarized as follows:

a) **Start date**: The recent AED activities began under the orders of the Supreme Court on 27 October 2018. Sub-projects will therefore be screened from this date onwards for any AED activities (e.g. removal or demolition). If AED activities have been carried out in any potential subproject site after October 2018, the subproject will not be eligible for financing.

b) **Type of investment supported under Component 1:** Eligible expenditures will be relatively small-scale, aimed at addressing localized infrastructure and service gaps

to improve livability of Karachi. Eligible capital investment sub-projects can be grouped into three broad categories: 1) public buildings/structures such as health and education infrastructure, public toilets, and fire control stations; 2) non-linear public space, such as public parks and public markets; and 3) linear urban road and storm water drainage. The table below summarizes the typologies of eligible capital investment sub-projects. In addition to capital infrastructure subprojects, there will be additional eligible expenditures, in particular, purchase and hiring of selected equipment and machinery (including IT-related equipment) for productive use among others.

Table 2: Eligible expenditures / subprojects for Infrastructure grants to LCs

Functional area	Indicative permissible capital investments
Local Roads and associated infrastructure	• Repair, maintenance, improvement, rehabilitation and construction of roads, streets, signalized intersections etc. under respective jurisdictions of LCs • Repair, maintenance, rehabilitation, construction etc. of sidewalks and walkways, bicycle paths, pedestrian bridges and crossings etc. • Repair, maintenance, replacement, installation etc. of Street lighting, road signage etc. – including energy-efficient lighting (with LED bulbs and/or solar-power)
Drainage	• Repair, maintenance, improvement, rehabilitation and construction of small-scale secondary and tertiary drainage systems and associated wastewater systems under jurisdictions of LCs (primarily including repair and improvement of existing infrastructure) • Covering of exposed street level drainage and sewerage channels • Purchase and hiring of selected machinery and equipment
Parks and Public Spaces	• Maintenance, improvement, rehabilitation, construction and operation of parks, playgrounds, greenery, recreational facilities, public and open spaces, lighting, street furniture, landscaping, tree plantation – including dedicated facilities and areas for women • Large public spaces, such as large parks, will be excluded as per criteria defined in PIM, EMF and SMF.
Public Buildings, Markets and public toilets	• Improved facilities for shops, mobile vendors etc. in LC-run markets • Repair, maintenance, improvement, rehabilitation, construction and operation of Public toilets, including dedicated facilities and areas for women • Repair, maintenance, improvement, rehabilitation, construction and operation of buildings and facilities of LCs, community centers, sports facilities, including dedicated facilities and areas for women • Purchase of and hiring of selected related equipment for use in such facilities
Health and Education Facilities	<u>For DMCs and District Council:</u> • Repair, maintenance, improvement and rehabilitation of existing primary health facilities and education buildings operated by LCs (all facilities / buildings to incorporate disaster-resilient construction standards and energy efficient designs). • Purchase and hiring of selected related equipment and items
Fire and Disaster Management	<u>Primarily for KMC:</u> • Repair, maintenance, improvement and rehabilitation of fire control stations and facilities (all facilities / buildings to incorporate disaster-resilient construction standards and energy efficient designs). • Purchase and hiring of selected equipment for emergency response / disaster management
Ineligible expenditures	Purchase of new vehicles (except for specific approved purposes such as under “drainage”), Salaries of staff, Utilities bills, fuel for vehicles, and others as described in PIM.

c) Zone of impact: For each category, the zone of impact will be the sub-project area, including all areas in the vicinity of the works likely to be used by the project/sub-project contractors (construction camp, storage of materials and machinery or any other temporary use). Bank policies (OP 4.12) and the screening mechanism shall apply to the sub-project zone of impact. A screening report for each potential subproject to be financed

under the CLICK will be reviewed and approved by LGD and shared with the Bank for review and NOL **before LCs can commence work**. All sub-projects eligible for Bank-financing will be restricted to areas that have not been affected by AED. For example, for interventions related to:

- *Structures such as health and education infrastructure, public toilets, and fire control stations*, the proposed structure (whether or not there are any clearance/eviction from within the specific structure), as well as the immediate surrounding areas will be included, to ensure that there is sufficient AED-impact-free space for temporary land needs (e.g., for contractors to deploy the equipment and machinery needed for construction activities, establish labor camps). Should there be any temporary relocation of mobile vendors or removal of temporary structure to meet space requirements for construction related activities, the vendors and impact on temporary structures will need to be compensated appropriately.
- *Public space, such as public parks and public markets*, the entire footprint of public space, regardless of its size, and immediate vicinity such as right of way will need to be free of any AED related impact.
- *Urban road and storm water drainage*, assessment will have to be done not just for the actual footprint/alignment of the intervention, but also for the right of way, including pedestrian sidewalks as well as adjacent buildings, on both sides of the roads/drainage alignment, as well as service road. In addition, the entire length/alignment of road and drainage of proposed sub-projects will have to be investigated and screened for AED activities to determine the extent and nature of possible overlap.

If the sub-project zone of impact can be associated with the AED activities (e.g. located too closely to the cleared site or close to very large-scale AED operation where a large number of structures or vendors were affected), the sub-projects will not be eligible for Bank financing.

The zones of impact of individual subprojects will need to be assessed, on a case by case basis, in order to determine whether the subproject is eligible for financing under the Project. This is necessary because the context, characteristics and nature of interventions of each sub-project activity may entail different zones of impact. For instance, for roads and drainage, extended areas of proposed road/drainage intervention such as right of ways and structures along both sides of the road and drainage will need to be included within the zone of impact of the subproject, and Bank policies will need to be followed within those areas. On the other hand, more localized areas may have been impacted by the AED, within larger areas that have not been impacted, i.e. along the long stretch of road and drainage, there could be one or two spots that were affected by AED and this will also need to be investigated and screened out.

d) **Screening steps:** Each sub-project will be first be assessed to determine if it is located in an area affected by AED. The assessment will also determine if and the extent to which surrounding areas of the proposed sub-project were also affected by AED. Potential sub-project sites located within AED impacted areas will not be eligible for financing under the CLICK

The screening process can be summarized as the decision tree diagram below:

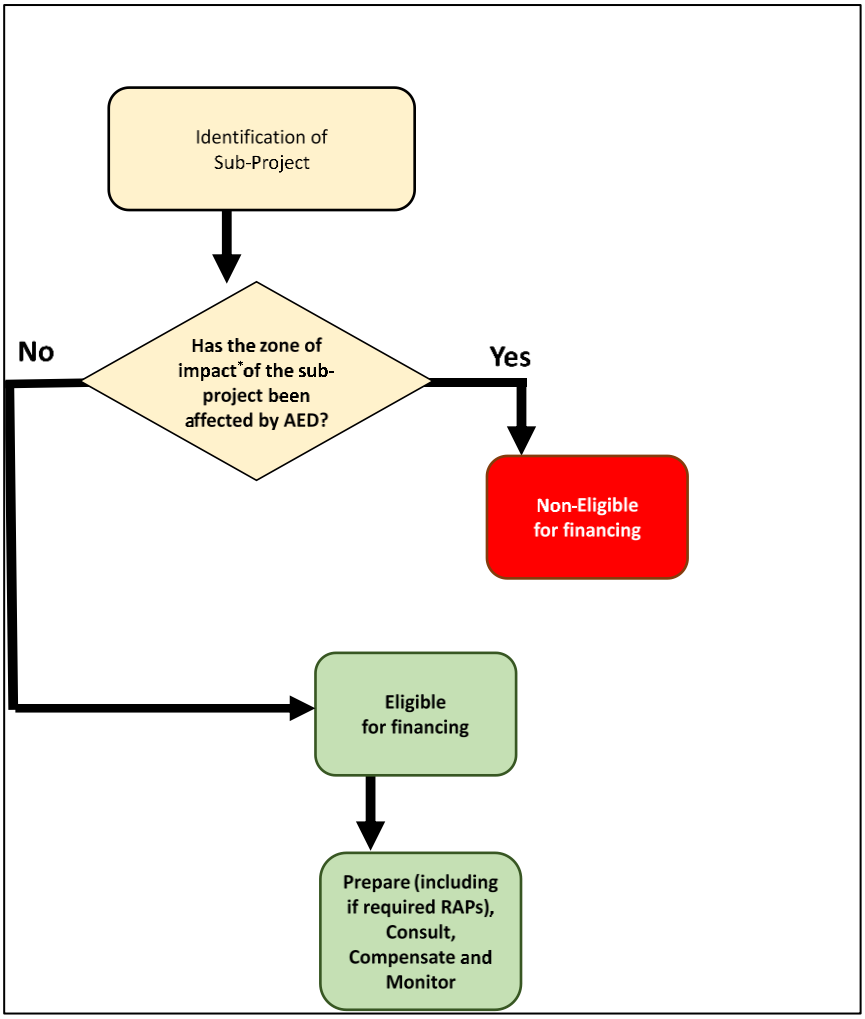


Figure 1: Decision Tree Diagram for Screening Process

* Zone of Impact will be determined on a case to case basis according to the type and context of the sub-project.

1.5.2.4 Support for Improved Social Management and Capacity Building

Under Component 1, performance-based grants will require, as a condition to access funding for capital investments, that participating Local Councils (LCs) should have the capacity for adequate and effective social safeguards management. Without meeting the minimum condition (which will be assessed, in time, by an independent auditing agency under the review of the Bank safeguards team), the participating LCs will not be able to access funds for capital investment. The minimum condition includes: i) having a designated focal technical person for environment and social management; ii) all eligible sub-projects are screened by LC for potential social and environmental safeguard impacts in accordance with the project's EMF and SMF; and iii) environment and social safeguard plans implemented by LC for all eligible subprojects where relevant, in accordance with the project's EMF and SMF. The minimum condition is verified every year during the project implementation by the independent agency.

1.5.2.5 Time lag for startup of sub-project investments

During the early implementation period, extensive training and capacity building of LCs will be done to ensure adequate expertise to prepare and implement safeguards instruments, in accordance to the Bank safeguards policies. In particular, sub-project investments will only

commence in year 2 of CLICK implementation, after minimum conditions are met by LCs. Only in year 3 a full allocation will be given to LCs for capital investment when performance measures are introduced. This proposed roll-out schedule for sub-project investments will allow sufficient time for participating ULBs to put in place the capacity to develop and implement safeguards instruments, for the monitoring system to be fully in place and the areas affected by the AED to be better understood, for coordination mechanisms to be operational, and for the Bank to ascertain the capacity of the various agencies to carry out their responsibilities as per the RAPs/EMPs consistent with the Bank's safeguards policies, before specific subprojects can be cleared for implementation.

1.5.2.6 Addressing system-level risks

A set of TA to improve the management of street/informal economy including regulatory improvement, registration of mobile venders and mapping on the digital platform is supported under the Project. The Bank is in the process of carrying out a review of Karachi's street economy including legal and institutional framework governing street economy, as well as assessment of key constraints and areas for interventions to formalize street economy. The review will inform the specific scope and design of TA to be supported under the Project. In addition, the Bank team will engage with the Government to determine the extent to which the government is interested in and or willing to develop a city-wide approach for addressing resettlement and rehabilitation issues, including facilitating sharing best practices and international experiences that have been adopted in other contexts.

1.5.2.7 Stakeholder engagement and communication campaign

A robust stakeholder engagement framework and the Project's proactive communication strategy will provide information to all stakeholders and create information and awareness about the project including the project's objectives, components, types of investments and sub-project areas supported, among others. The SMF includes public participation to inform and manage critical engagement with citizens. Implementing agencies will prepare guidelines/policies on public participation which articulate the objectives of public participation and the process to be followed during engagement with citizens. Public participation will be institutionalized as a service delivery and good governance mechanism. In particular, improvement in citizen engagement is incentivized and supported under Component 1 as one of the performance measures for capital investment programs - the more LCs achieve measures on citizen engagement, the more capital investment moneys the participating LCs will receive. Communication campaign and stakeholder engagement by LCs will be supported thru extensive technical assistance under the project. The stakeholder engagement through awareness raising/sensitization will ensure that local people are able to distinguish AED and WB subprojects and are able to understand that WB is not supporting/collaborating with the AED.

1.5.2.8 Grievance Redress Mechanism (GRM)

A robust GRM will be established, both at LCs levels. The project will also establish Public Information Centers at both LCs levels. There are gaps in the existing systems for complaints management and communities are not satisfied with them. A project-specific multi-tier GRM in line with the Bank's requirements will be established as per guidelines in the SMF and EMF, for civil works executed by LCs at the beginning of the project implementation. This will respond to queries, receive suggestions and address complaints and grievances about the project and about any disconnects and irregularities in application of the EMF and SMF.

In addition to the project-specific GRM, general GRM will be supported through performance measures under Component 1. KMC's existing system of Helpline 311 will be strengthened and similar systems established in other LCs. All participating LCs will develop GRM / citizen complaint referral systems for all services provided by LCs for their citizens. TA will be provided to all local governments to set up and/or strengthen their GRM systems. These efforts will expand LCs' capacity to respond to all grievances of their citizens over time. This LC-wide GRM, once operational, will be integrated with the CLICK-specific GRM for subprojects, enabling it to receive all grievances.

1.5.2.9 Legal Agreement

Compliance with Bank safeguards policies and the preparation and implementation of safeguards instruments are a requirement under the CLICK, as per the General Conditions of the Legal Agreement. Failure to comply with those obligations will result in suspension and possible cancellation of the Loan. This is consistent across all World Bank Legal Agreements. However, given the particular context of the CLICK and the risks associated with the AED in Karachi, a detailed Project Risk Reducing Procedure (PRRP) has been developed for this project, as a multi-level risk avoidance and risk mitigation process. The government has agreed that the PRRP must be followed for the CLICK to be implemented, and that failure to follow the step-wise procedure (e.g. screening, avoidance of AED-impacted areas, avoidance to compensate AED affected people, etc.) will give the Bank the legal basis to suspend the Loan. In order to highlight the PRRP as a critical part of the safeguards instruments, and to underscore its importance for this project, the Legal Agreement will explicitly define and make reference to the PRRP. Moreover, the Legal Agreement will make explicit notice that implementation of the CLICK is contingent to the government's compliance with the PRRP. Non-compliance with the PRRP will provide grounds for cancellation and suspension of the project.

2 LEGAL AND POLICY FRAMEWORK

2.1 LAR Legal and Policy Framework

This RPF is designed on the basis of the regulatory framework of Pakistan's for Land Acquisition Act 1894 and the World Bank Operational Policies, specifically OP4.12. The primary objective of OP4.12 is to ensure that PAPs are assisted to improve, or as a very minimum restore, their former living standards, income earning capacity, and production levels.

Under the Project the key principles of OP4.12 should be applied regardless of stipulation in national law:

- Infrastructure investments, such as works on road and connectivity, urban and storm water drainage, sanitation, public spaces, public markets, health and education, fire and disaster management will be planned to avoid or minimize disturbance and destruction of private property;
- Where adverse impact is unavoidable, RAPs and associated activities should be seen and executed as development programs;
- PAPs, as defined in the eligibility section, are entitled to compensation for the full replacement costs;
- PAPs should be provided with sufficient investment resources and opportunities to share in project benefits, specifically through improved access to health, education and sanitation.
- Any compensation or mitigation of impact due to PAPs under the project must be provided prior to commencement of civil works.

In Pakistan, LAA 1894 regulates the land acquisition process and enables the federal and provincial governments to acquire private land for public purposes through the exercise of the right of eminent domain. Land acquisition is a provincial responsibility and each province has its own province specific amendments in the Law and interpretation of the Act. The LAA and its implementation rules require that following an impact identification and valuation exercise, land and crops are compensated at the current market rate to the titled landowners. The LAA mandates that land valuation is to be based on the last 3 to 5 years average registered land-sale rates. However, in several recent cases, the median rate over the past 1 year, or even the current rates, has been applied with an added 15% compulsory acquisition surcharge according to the provision of the law. In addition to the provisions of LAA, related regulations setting out the procedures for land acquisition have been provided in province specific rules.

The LAA lays down definite procedures for acquiring private land for projects and payment of compensation. For entering private land or carrying out surveys and investigations, specified formalities have to be observed and notifications to be issued. Damage to any crops during survey and investigations has to be compensated. The displaced persons, if not satisfied, can go to the Court of Law to contest the compensation award of the Land Acquisition Collector (LAC).

The law deals with matters related to the acquisition/ or temporary occupation of private land and other immovable assets that may exist on it when the land is required for public purpose. The right to acquire land for public purposes is established when Section 4 of the LAA is triggered. The LAA specifies a systematic approach for acquisition and compensation of land and other properties for development projects. It stipulates various sections pertaining to notifications,

surveys, acquisition, compensation and apportionment of awards, along with disputes resolution, penalties and exemptions. The surveys of land acquisition are to be disclosed to the displaced persons. However the law only recognizes “legal” owners of property supported by records of ownership such as land record title, registered sale deeds, or agreements.

2.2 World Bank OP 4.12 and Resettlement Principles

World Bank has adopted OP 4.12 as a safeguard requirement for involuntary resettlement. The objectives of OP 4.12 is to avoid involuntary resettlement wherever possible; to minimize involuntary resettlement by exploring project and design alternatives; to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre-project levels; and to improve the standards of living of the displaced poor and other vulnerable groups.

The OP 4.12 covers physical displacement (relocation, loss of residential land, or loss of shelter) and economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods) as a result of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas. The important elements of OP 4.12 are: (i) compensation at replacement cost for lost assets, livelihood, and income prior to displacement; (ii) assistance for relocation, including provision of relocation sites with appropriate facilities and services; and (iii) assistance for rehabilitation to achieve at least the same level of well-being with the project as without it. The operational policy gives special attention to poor and vulnerable households to ensure their improved well-being as a result of subproject interventions. Followings are the basic policy principle of OP 4.12:

i. In the context of involuntary resettlement, PAPs are those who are physically displaced (relocation, loss of residential land, or loss of shelter) and/or economically displaced (loss of land, assets, access to assets, income sources, or means of livelihoods) as a result of (a) involuntary acquisition of land, or (b) involuntary restrictions on land use or on access to legally designated parks and protected areas.

ii. Screen the project early on to identify past, present, and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through a survey and/or census of displaced persons, including a gender analysis, specifically related to resettlement impacts and risks.

iii. Carry out meaningful consultations with affected persons, host communities, and concerned nongovernment organizations. Inform all displaced persons of their entitlements and resettlement options. Ensure their participation in planning, implementation, and monitoring and evaluation of resettlement programs.

iv. Pay particular attention to the needs of vulnerable groups, especially those below the poverty line, the landless, the elderly, women and children, and Indigenous Peoples, and those without legal title to land, and ensure their participation in consultations.

v. Establish a grievance redress mechanism to receive and facilitate resolution of the affected persons’ concerns. Support the social and cultural institutions of displaced persons and their host population. Where involuntary resettlement impacts and risks are highly complex and sensitive, compensation and resettlement decisions should be preceded by a social preparation phase.

vi. Improve, or at least restore, the livelihoods of all displaced persons through (a) land-based resettlement strategies when affected livelihoods are land based where possible or cash compensation at replacement value for land when the loss of land does not undermine

livelihoods, (b) prompt replacement of assets with access to assets of equal or higher value, (c) prompt compensation at full replacement cost for assets that cannot be restored, and (d) additional revenues and services through benefit sharing schemes where possible.

vii. Provide PAPs with needed assistance, including the following: (a) if there is relocation, secured tenure to relocation land, better housing at resettlement sites with comparable access to employment and production opportunities, integration of resettled persons economically and socially into their host communities, and extension of project benefits to host communities; (b) transitional support and development assistance, such as land development, credit facilities, training, or employment opportunities; and (c) civic infrastructure and community services, as required.

viii. Improve the standards of living of the displaced poor and other vulnerable groups, including women, to at least national minimum standards or pre project levels (whichever is higher). In rural areas provide them with legal and affordable access to land and resources, and in urban areas provide them with appropriate income sources and legal and affordable access to adequate housing.

ix. Develop procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement to ensure that those people who enter into negotiated settlements will maintain the same or better income and livelihood status.

x. Ensure that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of non-land assets.

xi. Prepare a resettlement action plan elaborating on PAPs' entitlements, an income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, budget, and time-bound implementation schedule.

xii. Disclose a draft RAP, including documentation of the consultation process in a timely manner, before project appraisal, in an accessible place and a form and language understandable to affected persons and other stakeholders. Disclose the Draft and final RAP and its updates to affected persons and other stakeholders.

xiii. Pay compensation and provide other resettlement entitlements before physical or economic displacement. Implement the resettlement plan under close supervision throughout subproject implementation.

xiv. Monitor and assess resettlement outcomes, their impacts on the standards of living of PAPs, and whether the objectives of the RAP have been achieved by taking into account the baseline conditions, and the results of resettlement monitoring. Disclose monitoring reports, and disclose monitoring reports.

2.3 Comparison of Pakistan's LAA and WB OP 4.12 IR Safeguards Policy Principles

The objective of this comparison is to identify and address inadequacy of the existing legal provisions whether the two sets of procedures are in conformity with each other and more importantly to identify and suggest measures to bridge these differences and gaps.

Comparison of Pakistan's Land Acquisition Act of 1894 (LAA) and World Bank's OP 4.12 on Involuntary Resettlement shows that the LAA of Pakistan and OP 4.12 deviate on some key points. The key World bank Policy Principles are (i) the need to screen the project early on in the planning stage, (ii) carry out meaningful consultation, (iii) at the minimum restore livelihood levels

to what they were before the project, improve the livelihoods of displaced vulnerable groups (iv) prompt compensation at full replacement cost is to be paid (v) provide displaced people with adequate assistance, (vi) ensure that displaced people who have no statutory rights to the land that they are working are eligible for resettlement assistance and compensation for the loss of non-land assets and (vii) disclose all reports.

The LAA in contrast to OP 4.12 does not require adequate consultation with affected parties; it simply requires that declaration and notice be given about temporary use of land or acquisition and the purposes for which it is required. Nor does the Act require preparation of a "plan" documenting the process, and consultations undertaken with PAPs. Finally, the LAA does not entitle compensation to PAPs without title nor provides compensation for income losses caused by LAR. **Table 3** summarizes the differences between the LAA and World Bank safeguards and the measures that need to be addressed to ensure the subproject implementation is fully consistent with the World Bank's requirements.

Table 3: Measures to address LAA 1894 & OP 4.12 differences or gaps

WB Involuntary Resettlement Policy OP 4.12	Pakistan, Land Acquisition Act (LAA) 1894	Proposed Gaps Bridging Measures
Early screening of the project to identify social impacts and risks. Determine the scope of resettlement planning through a survey and/or census of PAPs, including a gender analysis, specifically related to resettlement impacts and risks.	No such condition mentioned for early screening in the LAA.	Project potential social impacts were screened and categorized using a systematic methodological approach.
Carry out meaningful consultations with PAPs, host communities, and concerned civil society organizations.	No formal consultation with PAPs and other stakeholders is required.	Key stakeholders and PAPs consultation during planning and design of the project.
Lack of title should not be an excuse for compensation.	Titled land owners or holders of customary rights are only recognized for compensation.	Squatters, informal tenants/leaseholders are entitled to compensation for loss of structures and livelihood and for relocation.
Registration is not condition for crop compensation, which is provided according to their shares whether they are registered or not.	Registered landowners and sharecroppers/ lease holders are only eligible for compensation of crop losses.	IA will prepare land acquisition and resettlement plans, as part of project preparation based on an inventory of losses, livelihood restoration measures, based on the principles enumerated in OP.4.12.
Tree losses are compensated according to the market based rates on productive age or wood volume depending on the type of the tree.	Tree losses are compensated on the basis of out dated officially fixed rates by the relevant forest and agriculture departments.	Tree losses will be paid according to the market based rates on productive age or wood volume depending on the type of the tree.

WB Involuntary Resettlement Policy OP 4.12	Pakistan, Land Acquisition Act (LAA) 1894	Proposed Gaps Bridging Measures
Land valuation is to be based on current replacement (market) value and valued within 1 year before the delivery of compensation.	Land valuation based on the median registered land transfer rate over the previous 3 years before the establishment of Section 4 of the Act with an additional payment.	Land valuation is to be based on current replacement (market) value with an additional payment of 15%. The valuation for the acquired housing land and other assets is the full replacement costs keeping in view the fair market values, transaction costs and other applicable payments that may be required.
Valuation of built-up structures is based on current market value/cost of new construction of the structure. PAPs can take the salvage material free of cost.	Valuation of structures based on official rates, with depreciation deducted from gross value of the structure and 10 % for salvage material.	IA will ensure current market rates without any deduction of depreciation and salvage material.
Complaints and grievances are resolved informally through community participation in the Grievance Redress Committees (GRC), local governments and CSOs.	The Revenue Department is the only authority to decide disputes and address complaints regarding quantification and assessment of compensation for the affected lands and other assets. The PAP can contact the court of law in case of unresolved dispute.	IA will establish project based GRM and include GRC for complaint resolution.
Information related to quantification and costing of land, structures and other assets, entitlements, and amounts of compensation and financial assistance are to be disclosed to the PAPs prior to project appraisal.	The decisions regarding land acquisition and the amounts of compensations to be paid are published in the official Gazette and notified in convenient places so that the people affected get aware of the same.	Findings of census survey regarding all lost assets, compensation amount and Entitlement Matrix will be shared with PAPs prior to subproject appraisal.
WB policy requires rehabilitation for lost losses, and for expenses incurred by the PAPs during the relocation process particular attention must be paid to the poor and vulnerable groups.	No provision for income/livelihood rehabilitation measure, allowances for severely affected APs and vulnerable groups, or resettlement expenses.	Provision should be made to pay for resettlement expenses (transportation and transitional allowances), compensate for loss of income, and provide support to vulnerable persons and those severely impacted (considered to be those losing more than 10% of their productive assets, below poverty line, the landless or those without a title to land, the elderly, female headed households, women, transgender people, and children).

WB Involuntary Resettlement Policy OP 4.12	Pakistan, Land Acquisition Act (LAA) 1894	Proposed Gaps Bridging Measures
Requires the establishment of accessible grievance redress mechanisms to receive and facilitate the resolution of PAP's concerns about displacement and other impacts, including compensation.	No convenient grievance redress mechanism except recourse of appeal to formal administrative jurisdiction or the court of law.	IA will establish easily accessible grievance redress mechanism available throughout project implementation that will be widely publicized within respective project area and amongst the PAPs.
Disclosure of draft & final RAP to PAPs and on IAs World Bank Website	No requirement for disclosure	Disclosure of RAPs at planning, design and implementation stages.

2.4 Gap Bridging Measures

In order to establish a land acquisition and resettlement policy framework for the Project, which reconciles Pakistan's legal and regulatory system for LAR (LAA 1894) and World Bank's OP 4.12, and addresses the gaps between the two systems, the following principles (as mentioned under the project LAR policy below) will be adopted and reflected in the eligibility and entitlements provisions indicated in section 7 of the RPF on compensation entitlements.

2.4.1 Resettlement Policy for the Project

Based on identified gaps between World Bank's OP 4.12 requirements and LAA practice and procedures following LAR policy is formulated for the subprojects to be implemented:

i. A social Impact Assessment will be carried out for all subprojects to be implemented and the subprojects will be screened at early stage to avoid, minimize or mitigate involuntary LAR impacts causing physical and/or economic displacement. For subprojects with resettlement impacts, a comprehensive assessment of social impacts, involving (a) a census of all displaced persons (titled and without title), and an inventory of their lost assets (b) a sample based socio-economic survey of displaced persons, and (c) a detailed measurement survey and valuation of all lost assets including lost incomes sources will be carried out and accordingly comprehensive RAPs will be prepared for every subproject with resettlement impacts under the CLICK. The impact assessment will also include the preparation of the inventory of registered and unregistered vendors and hawkers.

ii. Potential stakeholders will be identified and meaningful consultations will be carried out at each stage of the project planning and design and shall be continued throughout subproject resettlement planning, implementation and monitoring periods. The PAPs and other stakeholders will be consulted and informed as well as given an opportunity to participate in the resettlement planning and implementation activities. All consultations will be documented and the consultation records will be maintained throughout subproject implementation.

iii. An effective grievance redress mechanism with representation of all stakeholders will be established at the project level at the time of project inception and will be kept intact and functional throughout implementation period to address the social issues related to project design, resettlement planning and implementation, restriction of access to resources and

basic amenities during construction and any other social matter that arises during implementation of the project.

iv. .The legal title will not bar to compensation under the project, and all PAPs with legal title or recognizable title/claim to acquired land and land-based assets on or before the cut-off date will be entitled for compensation of acquired assets including land and relocation and rehabilitation measures, as applicable, regardless of nature and type of impacts (permanent or temporary, full or partial). However, the PAPs occupying the public ROW or acquired land (on or before cut-off date), without legally recognizable claims to land will be only entitled for compensation to the extent of affected assets other than land as well as relocation and rehabilitation support under RAP provisions and entitlements. This will also cover the vendors, hawkers both registered and unregistered.

v. Compensation of land and structures will be at full replacement value, either through the replacement of land or structures[91] of equivalent or higher value and quality or through cash compensation at replacement cost[92]. The value of structures will not be depreciated for age and the salvage will be allowed to PAPs. It will be ensured that PAPs are not displaced physically or economically before payment of compensation and other entitlements for their lost assets and income and livelihood restoration program is in place.

vi. Incomes and livelihood sources lost due to acquisition of land or interruption of business activities and employment due to lost productive assets or business structures will be fully compensated either on actual loss if the lost income potential is supported with tax records or on the bases of minimum earning levels prevalent in the project corridor for a period required to re-establish and restore the income levels as assessed during census and socio-economic assessment surveys. In addition, the PAPs who will permanently lose income and livelihood sources as well as poor and vulnerable PAPs will be entitled to credit, training and employment assistance to maintain or improve their livelihoods.

vii. All lost civic infrastructure and community services will be either restored at site or established at replacement land and the PAPs will be provided opportunities to share development benefits of the subproject, if feasible.

viii. In case of subproject-based resettlement sites for relocation, the PAPs will be entitled for secure tenure to replacement land, better housing, transitional support and access to civic infrastructure and services at resettlement site.

ix. For all subprojects involving resettlement impacts, RAPs will be prepared following the principals outlined in the RPF for the Project. RAPs elaborating on PAPs' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, RAP budget with financing plan, and time-bound implementation schedule will be shared with World Bank for review and clearance before appraisal of the subprojects. The RAPs and its translation in Urdu language will be disclosed on the World Bank's and IA's websites while summary of hard copies translated into Urdu language understandable to local community will be placed at accessible place in Project area. The RAP provisions, particularly those on impact assessment and valuation, eligibility and entitlements, compensation delivery and grievance redress mechanisms will be disclosed

[91]For replacement of land or structures all transaction costs will be paid by the project or included in compensation payments to the PAPs.
[92]Full replacement cost involves fair market value, transaction costs, interest accrued, transitional and restoration costs and other applicable payments without depreciation.

to the PAPs by the IA through dissemination of information brochures, placing information boards/banners at conspicuous places in affected towns around the Project corridor.

x. A monitoring mechanism for regular monitoring of RAP implementation progress will be established before start of implementation of government endorsed and World Bank cleared final RAP for each subproject. The RAP implementation progress and livelihood restoration measure in place for each subproject will be monitored and evaluated during RAP implementation and periodic social monitoring reports will be compiled and shared with World Bank.

xi. If there are substantial delays in project implementation after preparation of RAP, the RAP will be updated before the start of implementation of project and will be shared with the Bank for review and clearance.

2.4.2 Specific Provisions for disadvantaged or vulnerable individuals/groups

One of the key OP 4.12 requirements on involuntary resettlement is to improve or at least restore the standards of living of the displaced poor and other vulnerable groups who may experience adverse impacts disadvantageously from subproject intervention because of their disadvantaged/vulnerable status. Typically, those below poverty line, the landless or those without a title to land, the elderly, female headed households, women, transgender and children, comprise the disadvantaged or vulnerable groups within a subproject's displaced population.

To identify vulnerable persons/households, the following vulnerability indicators have been established for the CLICK and the households' exhibit one or a combination of the conditions below will be termed as vulnerable:

- The poor with their income level equal to or below minimum wage officially announced by the GoS or using a poverty line of Rupees 3,030/- per adult person per household (whichever is higher).The land less or those without legal or legalizable title to with their livelihood dependent to acquired land.
- The disabled elderly and female headed households including women, transgender and children.

Vulnerable households with specific resettlement impacts on their livelihood will be identified during census and socio-economic survey for each subproject and will be indicated in each RAP. Such displaced individuals/vulnerable groups will be consulted on measures to safeguard against impoverishment and accordingly livelihood and income restoration measures for rehabilitation and enhancement of their livelihood will be provided in the RAP and ensured during execution of the project.

2.4.3 Provisions for Women PAP

Acquisition of household assets can impact women disproportionately due to their fragile socio-economic status and it could be difficult for them to re-establish their socio-economic activities because of restricted mobility or illiteracy. Although the female household heads or the female having title of the acquired assets are eligible and entitled for compensation and benefits for their lost assets similar as to their male counterparts but they may need special attention because of lack of resources, educational qualifications, skills, and work experience. To safeguards women needs and interests, following measures will be considered during impact assessment, census of displaced persons, designing rehabilitation/resettlement provisions and preparation of the RAP for each subproject under the CLICK.

- Gender segregated socio-economic baseline and impact inventory linked to the entitled PAPs will be developed and women shall be compensated for assets in their name, meanwhile identified female headed households (if vulnerable) will be entitled for additional compensation as provided in the subproject RAP.
- During census and socio-economic assessment, meaningful consultations will be conducted with displaced women through focus group discussions and individual meetings to identify the concerns and mitigation required in resettlement planning and accordingly the subproject RAP will detail the scope of resettlement impact on women and wherever required separate gender action plan will be developed.
- In case of compensation for household assets, efforts will be ensured to pay compensation in the joint accounts (if possible) and in case of provision of replacement asset, i.e., land or structure (residential/Commercial) at resettlement/relocation site, it will be ensured that the provided asset is transferred in the joint ownership of the male and female counterparts of the displaced households; and
- Gender sensitive grievance redress system with women participation will be ensured to facilitate the aggrieved women (if any) to lodge complaints and get their concerns resolved.

2.4.4 Indigenous People

Indigenous Peoples (IP) safeguards requirements as defined in the OP 4.10 of World Bank are triggered when the projects (direct or indirect) impacts are identified on the assets or resources of some distinct group of people or tribe as defined by OP 4.10. In Pakistan, the indigenous people are located only in three valleys of Kalash in Khyber Pakhtunkhwa province. As the CLICK will be implemented in Karachi, therefore, the Indigenous People are not located in the geographical coverage of the Project. Therefore, the Indigenous Peoples Safeguards of the World Bank's OP 4.10 is not triggered. Change of Subproject Scope or identification of Unanticipated Impacts.

In case of change in scope of Project or unanticipated impacts identified during subproject implementation are not covered under the eligibility and entitlement provisions of this RPF, new and additional eligibility and entitlement provisions will be determined in accordance with the resettlement requirements of the World Bank's OP 4.12 and the applicable legal framework of Pakistan. Accordingly, the RPF will be updated and government endorsed and World Bank cleared updated RPF shall be disclosed on the World Bank and IA websites. Based on updated RPF, specific subproject RAPs will be prepared with new eligibility and entitlement provisions on account of unidentified impacts and losses under any subprojects and the concerned displaced persons of such subprojects will be consulted and on new entitlement and RAP provisions will be disclosed to them.

2.5 Compensation Eligibility and Entitlement

2.5.1 Cut-off Date

The eligibility for compensation will be limited to the first day of the census survey and will be cut-off date for each subproject that involves LAR impacts. The cut-off date shall be to avoid false and frivolous claims for compensation, relocation and livelihood rehabilitation entitlements. Any person who enters in the project land after announced cut of date or any assets established in

area of impact after cut-off date will not be eligible for compensation however, the affected persons will be served a prior notice to remove their assets and take the salvage free of cost.

Each PAP will be enlisted and issued identification as to confirm his presence on the proposed site of a subproject prior to the cut-off date at the time of RAP implementation. The cut-off date will be disclosed to the PAPs through consultative meetings, focus group discussions, field surveys and other means of communication including face-to-face communication with communities. The disclosure of cut-off date will be formalized through documentation of consultation meetings and disclosure reports.

2.5.2 Compensation Entitlements

Under the Project broader categories of the eligible persons entitled for compensation may include (i) persons with formal legal rights to acquired land and/or structures in entirety or in part, (ii) persons who have no formal legal rights to land and/or structures lost wholly or in part but who have claims to such lands that are recognized or recognizable under national law, and (iii) persons who lost the land or structure they occupy in entirety or in part who have neither formal legal rights nor recognized or recognizable claims to such land. The eligible PAPs entitled for compensation under this RPF may include but not limited to the categories defined below:

- Owners of land and assets, i.e., structures (residential/commercial or of any other use) with formal legal title to land and the recorded occupiers/users of land/assets as provided in the land record registers and cadasters etc.;
- The persons whose rights are not formal or legal but whose claims are recognized or recognizable under national laws or customs will be eligible for compensation against their affected land/assets. Such PAPs may include people who have customary usufruct right to the land that is held either by the community (collectively) or the state or people who have inherited, occupied, and utilized the land for generations but lack titles simply because the state has not formalized the land records and issued title to them.
- PAP without formal legal rights or recognizable claims under National law and customs and may include all squatters, tenants, sharecroppers, wage labourers, hawkers and vendors. Although such PAPs will lack legal or recognizable rights to the land/asset but because of lost assets or impacted livelihoods they will be considered displaced persons eligible to receive compensation of assets other than land and resettlement assistance.
- Cultivators or those whose livelihood is dependent on acquired land, business operators of affected commercial structures and their employees whether registered under law or informal and the identified vulnerable groups.

3 SOCIAL IMPACT ASSESSMENT

3.1 Impact Assessment

Preparation of RAP for each subproject with LAR impacts under the subproject will require a detailed social impact assessment which will be initiated at early stage as part of planning and design of all subprojects to be implemented. The social impacts assessment will include initial LAR impact assessment, screening and IR categorization of subprojects, preparation of inventory of lost assets (ILA) followed by a detailed measurement survey (DMS) and census of PAPs, a socio-economic survey (SES), and valuation of lost assets (VLA). The results of the IR and Social Impact Assessment will be presented in aggregate form in the subproject RAPs, and impacts inventory linked to respective PAPs will be annexed in the RAP document.

3.2 Census Survey

A census of all categories of losses and PAPs will be undertaken, based on the categorizations in the entitlement matrix (**Table 2**) provided in this RPF document to determine the exact number of people likely to be affected by the subproject. The purpose of the survey is to determine who is entitled to compensation, assistance, and other benefits. The inventory of affected assets and other losses will be itemized by enumerating losses of each category of land, structure, and other assets, which will help in providing compensation for the lost assets. For crops, land use, affected area, total area and type of compensation, type of crops affected, owner, average yield, and yearly household income from agriculture will be determined. For trees, type, age, owner's name and average yield of fruit bearing trees will be recorded. For structures, type, age, affected area, utility connections, building materials, and area of building will be recorded. Additional information is required for business losses including vendors and hawkers in addition to other businesses, affected public utilities, preferences for relocation, loss of cultural and religious properties, and territorial claims by any ethnic group.

3.3 Baseline Socioeconomic Sample Survey

A socioeconomic survey of 20% of the various categories of PAPs will be carried out to provide a detailed socio-economic profile of PAPs. The information gathered will focus on: (i) household composition and demography; (ii) education; (iii) livelihood patterns; (iv) ownership pattern of the households; (v) AP income levels and expenditure patterns; (vi) availability of social services in project areas; (vii) PAPs views on the subproject and various resettlement and rehabilitation options; (viii) specific impacts on the poor, women and other vulnerable groups.

In addition to the demographic and socio-economic household level baseline data, the survey will employed to investigate in depth their socio-economic condition, as relevant to the subproject measures and goals to be used as a benchmark for monitoring the socio-economic status of PAPs.

3.4 Detailed Measurement Survey

A detailed measurement survey (DMS) will be carried out with participation of PAPs for identifying and providing the measurement of the dimensions and quantities of all affected assets, including, as applicable, land (residential and agricultural), buildings, communal/public or cultural/religious facilities, crops, trees and business incomes and wages, will be the basis of the impacts assessment will be included in the RAP. The measurement of the affected land parcels and relative land market rates will be carried out by the revenue officers (DO Revenue, *Mukhtiarkars* and *Tapedars*) of the Revenue Department in cooperation with KMC. The pricing for loss of

houses and structures will be based on precise measurement and record of type, quality and measurement of materials and will be calculated based on replacement cost, i.e., cost of new building materials and labor. The data gathered for the detailed measurement survey will be accompanied by the preparation of accurate lists of PAPs, as the basis for the preparation of the PAP census and socio-economic survey.

3.5 Screening of Vulnerable Households

During the census and socio-economic surveys vulnerable groups including female headed households, disabled, transgender, elderly persons and persons below the poverty line will be screened to ensure that assistance is provided to those who are genuinely in need to reduce vulnerability and improve their living standards. The following criteria will be applied for screening vulnerable PAPs during RAP preparation for subprojects:

- Female-headed households without sons or other male members contributing income;
- A female who is widowed, divorced or separated;
- Transgender;
- Family members below 18 years of age;
- Households headed by a disabled or elderly, aged 65 or above responsible for raising the family and other members are below 18 years age; and
- Households below the minimum wage as announced by the GoS per month.

Mechanisms will be established to ensure that these and other vulnerable groups are adequately represented and consulted, and that their needs and aspirations regarding the subproject are fulfilled.

3.6 LAR Database

Once DMS and valuation of assets is completed, the PAPs census data will be updated by incorporating entitled compensation costs for the acquired assets and applicable relocation, rehabilitation and income restoration costs applicable against each acquired asses and payable to the respective PAPs. The updated census inventory of lost assets as well as socio-economic base line of PAPs will be consolidated and computerized in a database form for each subproject RAP. This database will be used as base line for subsequent implementation and monitoring of subproject RAPs. This database will be kept updated by incorporating information on compensation payment against each paid PAP for day to day tracking of RAP implementation progress and generating periodic RAP implementation progress and social monitoring reports to facilitate efficient safeguards management and monitoring of RAP implementation progress.

3.7 Valuation of Lost Affected Assets

The OP 4.12 requires that the compensation for acquired assets should be on replacement cost basis including fair market value, transaction costs, transitional support, interest accrued and other applicable payment under law, while the provision 23[93] of LAA 1894 explains the compensation determining mechanism. Besides the taxes, fees or any charges on land subject

[93] Section 23 requires to compute compensation on i) fair market value as of section 4, ii) sustained crop and tree losses, iii) losses resulted from severing of land, iv) losses for injuriously affecting other immovable or moveable holding and earnings, v) losses for compelled change of residence or business place and vi) diminution of profits etc.

to acquisition are waived off and the affected land owners are provided with solatium @ 15% of assessed land compensation rate as compulsory land acquisition surcharge. Although the mechanism for compensation assessment under LAA is somehow consistent to the OP 4.12 requirements, however, it is likely that, in some instances, the compensation cost assessed under law may fall below the replacement cost because of the tendency of undervalued registration of recorded transactions.

When needed, CLICK subprojects will adopt negotiated purchase of land as the first preferred option for land acquisition and if that is unsuccessful expropriation may be followed in a manner consistent with the National/Provincial Laws and World Bank OP 4.12. In either case, compensation will be computed on replacement cost basis by adopting the following process:

Negotiated purchase of land will be initiated immediate after publication of notification under Section 4 of LAA 1894, on the written confirmation from the IA to the District Collector. The IA, in coordination with the district collector will constitute, a land acquisition and resettlement negotiation committee including representatives form SSMC/PIU for settling negotiated land cost with PAPs whereas the district collector's office will facilitate the committee by providing estimated land costs and relevant records of land required during negotiations process. The committee will determine market value of land for negotiated purchase by considering the factors including but not limited to: (i) estimated land costs determined by the land revenue authorities based on yearly average from recorded transactions prior to notification of section-4 under LAA,(ii) the price paid for similar land types recently acquired in the project area and paid price for similar land types in recent private transactions (recorded before notification under Section-4) (iii) consultation with respectable people, property agents and appraisers who are disinterested with regard to the value of the land; and iv) review of updated land valuation tables and other available information and instructions on valuation of assets under national laws and LAA procedures.

The process of negotiation with the PAPs will be completed within 90 days preferably from the day negotiations started. In case of successful negotiations, the sale agreement/deeds will be signed between the negotiating parties and the district collector will assist and proceed with registering the sale deed accordingly. Levis, taxes and transaction costs applicable on private sale deeds will be waived off as required under LAA procedures. The process will be outlined in the RAP describing the procedures followed including requirements of the OP 4.12. Nonetheless the negotiations will be documented and a third party will be engaged by IA to validate the process confirming that the risk of asymmetry of information and bargaining power of the parties involved in negotiated transactions were fully addressed.

Land Acquisition through expropriation under LAA will follow if land acquisition through private negotiations is unsuccessful. In that case, the compensation package will be based on fair market value and other incidental costs as provided in Section 23 of LAA 1894. However, to ensure the compensation is reflective of replacement cost, the factors to determine fair market value of land may include: (i) the price paid for land recently acquired in the project area and price paid for land in recent recorded private transactions (recorded before notification under Section-4) in mutations register or the record of the registration department;, ii) review of update land valuation tables and other available information and instructions on valuation of assets under national laws and LAA procedures etc., (iii) review of prevailing market rate determined through consultation with respectable people and property agents/appraisers who are disinterested with regard to the value of the land, etc. In addition to the land compensation determined under law, a 15% compulsory acquisition surcharge and any additional assistance applicable under law will be provided as a solatium.

Temporary occupation of land if required for project contractor's facilities like camps sites, stack yards, etc., will be through term lease agreement between the civil works contractor and the land owners. The Contractor will directly negotiate with the respective land owners to agree on terms and conditions of leasing arrangement for temporary occupation of land and accordingly a lease agreement can be signed between the contractor and the respective land owners. However, the PIU will ensure the lease terms are judicious and cover provisions on restoration of land to its original use if it is not otherwise agreed between the contractor and the land owners. But, if the land is required temporarily for constructions of diversions, the PIU can itself procure occupation of such land on a termed lease either by invoking section-35 of the LAA or through direct negotiations with the land owners. In either case the temporary occupation term will not exceed three years and the land owners will be provided with the agreed lease money and incidental land restoration costs to restore the land to its original use. The provisions on establishment of campsites, stake yards and temporary diversions will be included in the SMP prepared for the project and shall be monitored accordingly.

Land associated assets, including structures, crops, tress if acquired will also be compensated on replacement cost without depreciation and salvage material will be allowed to the PAPs. For providing compensation on replacement cost for affected assets other than land following measures will be considered for valuation and assessing unit compensation rates:

- Houses and other structures will be valued at replacement cost based on construction type and size of the affected structure and prevalent labour cost in the area. In case of the partial loss with remaining structure viable to restore for its use, the compensation on replacement cost bases will be paid for restoration of the affected structure and when the structure is affected to the extent not restorable, it will be compensated in entirety. No deductions will be made for depreciation, salvageable materials or transaction costs and taxes. Rates for building structures will be evaluated by the KMC where relevant using the latest/current Composite Schedule Rates that are regularly published.
- Crops will be valued at current market rates of gross value of harvest as valued by the relevant provincial Agricultural Department.
- The loss of fruit and non-fruit bearing trees will be compensated based on their type, productive age and the market value of the produce for the remaining period of its average life or a period required to grow a new tree with same production potential. The value of younger but un-productive fruit trees will be based on the expenditure made to bring the tree to its current state. For assessment of the fruit trees, the agriculture and horticulture departments of the Sindh Province will be coordinated.
- The value of trees that would have been used for timber will be calculated based on the average volume and quality of wood produced and taking into consideration the size classes as determined by girth, diameter at breast, height and volume as assessed by the Forest Department of above mention each province.
- Lease rate/rent for temporary use of land will be fixed as per prevailing market rate in agreement of the PAPs.

4 STAKEHOLDER CONSULTATION AND INFORMATION DISCLOSURE

4.1 Consultation with Key Stakeholders

Consultations, participation and information disclosure will be an integral part of RAP planning, preparation and implementation strategy for each subproject under the CLICK. The IA will devise and implement a comprehensive consultation, participation and information disclosure strategy to ensure the stakeholders who are directly or indirectly involved in the project including PAPs, marginalized/vulnerable beneficiary groups, government officials and civil society for each subproject identified as having involuntary resettlement impact are meaningfully consulted during the entire project cycle.

Meaningful consultations will be carried out particularly with PAPs, communities and other key stakeholders during preparation and implementation of RAP of each subproject to solicit their views, identify their needs and preferences for compensation and rehabilitation measures and relocation. The nature and timing of these consultations will vary depending upon the implementation stage of the project. Subproject specific stakeholders will be identified through the initial social assessment of each subproject. Stakeholder consultations and information dissemination will be carried out over the preparation of the subproject through community meetings, focus group discussions and interviews of key informants so that they can share their views and recommendations for the subproject preparation and implementation. These recommendations will be included in the subproject RAP and with description of actions defined to address them.

The SSMC team will retain a close liaison with the PAPs and other stakeholders. The PAP and other stakeholders will be informed on their rights, eligibility, compensation entitlements, payment procedures and requirements. The project-based grievance redress system with grievance handling mechanism will be explained and the PAPs will be kept informed during resolution of grievances. The information related to land acquisition process and status, processing of claims, payment of compensation timelines for acquired assets and delivery of resettlement, rehabilitation and income restoration costs/measure will be provided repeatedly.

The consultation meetings with all stakeholders will be recorded and documented comprehensively, including signed attendance lists, photographs and minutes of the key issues addressed and agreements reached, observations made in the field, and outstanding issues in need of being addressed. The consultations will be documented in the RAP with consultation records appended. This information will be updated for each RAP update and will also be continued in the LAR monitoring reports.

4.2 RAP disclosure and dissemination

The RPF for the CLICK and RAP prepared for each subproject to be implemented under the Project and periodic social monitoring reports prepared will be subject to disclosure. The RPF and the subproject RAP will be disclosed on World Bank and KMC's websites during project implementation. Meanwhile, the RPF and the subproject RAPs will be disclosed to PAPs and other stakeholders by placing the copies at accessible including the relevant PIU and District and Town offices along the Project corridor.

The RPF and summary of the subproject RAPs detailing information about project description and resettlement impacts, legal framework, compensation eligibility and entitlements, grievance redress mechanism, institutional arrangement, compensation payment process and

implementation time frame will be translated into Urdu and will be disclosed to the PAPs and local communities.

KMC will prepare an Information Brochure in Urdu Language including summary information on the key aspects of the resettlement process of a subproject including but not limited to subproject summary and social impacts, grievance redress mechanism with institutional set-up, general eligibility and entitlement provisions. Such brochure will be disseminated to the PAPs during preparation and updating of the RAPs. In addition, the cut-off date and other information on relevant issues will be disclosed to PAPs and other stakeholders in the project area through leaflets in Urdu made available at project and relevant government offices.

5 INSTITUTIONAL ARRANGMENTS

5.1 Overview

The land acquisition and compensation activities described in this RPF involved distinct roles, functions, processes as well as various agencies. The role and responsibilities of these actors and agencies involved in all LAR activities at different levels are discussed below.

5.2 Institutional Roles and Responsibilities

5.2.1 Project Steering Committee

An inter-departmental Steering Committee will be notified by GoS for this project, to provide overall strategic oversight of the project and review implementation progress on a regular basis. It will be chaired by Chairman, Planning & Development Board (P&D) or his nominee/representative and will have high-level representation from all relevant agencies of the project. This Committee will facilitate inter-agency coordination to ensure adherence to project objectives; resolve inter-agency disputes related to the project, if any; provide policy, regulatory and institutional recommendations related to the project; and help facilitate timely availability of GoS share of project financing, if any, and timely approvals for project-related matters pertaining to agencies included in the committee, where relevant.

5.3 Project Implementation Arrangements

LGD will have overall responsibility for for coordinating and managing the performance-based grant system and providing centralized TA support to LCs. It will directly implement various TA activities to assist LCs in achieving the performance conditions, and to assist LCs in implementation of all aspects of the performance-based grants, including capital investment subproject. A Project Management Unit (PMU) will manage these functions on behalf of LGD. It will be headed by a full-time Project Director and staffed with necessary technical experts hired from the market or deputed from GoS as necessary, especially in the following areas: technical (institutional development, capacity building), FM, procurement and contract management, and environmental and social safeguards management.

LCs will directly implement subprojects under Performance-based grants. They will do so through their own staff and hiring / deputation of any additional required staff, especially for technical, environmental and social safeguards, FM and procurement functions. LCs will also rely substantially on LGD for technical support.

IA (LGD in collaboration with LCs) has the overall responsibility for preparing the RPF and implementing the Resettlement Plan with World Bank approval. It will ensure that all compensation, resettlement and rehabilitation activities are carried out satisfactorily before the disbursement of funds for construction work to commence. IA will be responsible for the subprojects execution and delivery of safeguards management following provisions in a manner consistent with the World Bank policy principals and national legal framework. Besides, it will engage supervisory consultants including safeguards specialists for assisting IA in preparation, implementation and monitoring of the safeguard documents for different subprojects during implementation of the investment program.

LGD will provide assistance to LCs in screening, selection, design, supervision and monitoring of subprojects as requested by LCs, and in the preparation and implementation of environment and social management plans for LCs' subprojects if required, consistent with the procedures in

this SMF / RPF. LGD is also responsible for monitoring and consolidated progress reporting for Component 1.

5.3.1 Project Management Unit (PMU)

At Project level, IA will exercise its functions through the PMU housed in LGD. For purposes of safeguards issues under component 1, safeguards capacity is required in the PMU in LGD and in LCs. The PMU will be responsible for general project execution of the project and streamline the safeguards related tasks of different subproject headed by the Project Director (PD). The PMU is responsible to ensure compliance with the national as well as WB environmental and social safeguard requirements including preparation of RAP/ARAPs and other management plans.

The PD will be responsible for implementing the safeguards instruments for all subprojects and for maintaining regular contact with local community and authorities. The PMU will collect information and progress on social safeguards compliance through Social Safeguard Management Cell (SSMC) which will be established at Project Management Unit (PMU), which will be tasked with day-to-day project related activities at project and subproject level.

For the purpose of this Project the PMU will serve as a central unit for providing technical backstopping with regards to safeguards management for all subprojects and has the overall responsibility for planning, implementation and supervision of safeguard functions described in this RPF of the investment program.

The PMU will keep a close liaison with the World Bank safeguards team to seek clarity and guidance on safeguards requirements of the program and will oversee the supervisory consultants for preparation of safeguard documents. PMU will ensure quality of safeguards documents prepared by the consultants and shall endorse all safeguards related documents to World Bank for review, clearance and disclosure. The role of PMU will include.

- Coordinate with the provincial governments, Planning & Development Department, Board of Revenue;
- Coordinate with the supervisory consultants and keep an oversight to facilitate them during impact assessment, census and socio-economic surveys and consultations with PAPs during for RAP preparation. This is to ensure consistency of approach and avoid variation in information obtained and given and to address issues immediately as they arise on site;
- Ensure that the RAP preparation consultants should in conformity with the RPF provisions and the impacted assets should be accurately assessed and linked to the respective PAPs.
- Coordinate with supervisory consultants, Board of Revenue and other line departments and units in IAs to streamline resettlement planning activities
- Internally review the RPF and RAPs (draft/updated), coordinate with World Bank in review and approval process, and ensure timely disclosure of approved RAPs on KMC Website and translation of Summary RAPs in local language for disclosure to PAPs;
- Coordinate with the SSMC for review of RAP implementation progress and ensure timely preparation of quality monitoring reports. The monitoring reports will be internally reviewed to ensure quality final reports are shared with World Bank for review and

acceptance and shall ensure timely disclosure of approved monitoring reports on IA Website.

- Ensure timely disclosure of design and LAR related information to the PAPs which may include information on project alignment and design, ROW land acquisition process and publication of notices under LAA provisions by the LAC in a format and language easily understood by PAPs and at easily accessible places.

5.3.1.1 Social Safeguard Management Cell (SSMC)

Since the LC has been entrusted the responsibility as a specialized company to lead in delivering the mandate of the CLICK. To address the limited implementation capacity of LCs in implementing RPF a dedicated Social Safeguard Management Cell (SSMC) will be established within the KMC it will establish a dedicated Social Safeguards Management Cell to be nested in PIU. KMC through PIU will recruit a full time Social Safeguards Officer with the relevant experience of handling social safeguards issues for planning, implementation and monitoring subprojects. The SSMC team will also include a Social & Gender Officer and two social mobilizers (male and female) to liaise with communities particularly underserved *katchi abadis*. The Team will be responsible for grievance redress and organizing training programs on social management aspects and the successful implementation of the RPF activities

The key role of the SSMC will be to coordinate supervisory consultants in the preparation of RAP/ARAP of subprojects in accordance with the provisions laid out in this annexed RPF through hiring a consultant/or by supervisory consultants and these will be submitted to WB for approval.

To achieve this, the role and responsibilities of the SSMC will be as follows.

- Screens proposals/studies for the subprojects related to safeguards issues in compliance with safeguards requirements specified in this RPF
- Maintains records of all proposals and screening decisions.
- Ensure that the supervisory consultants will implement the TOR consistently particularly for safeguards mainstreaming in terms of process and outputs;
- Provide general oversight of the activities under Component 2 to ensure compliance with this RPF;
- Function as grievance redress office on LAR related matters/concerns raised by the PAPs during RAP preparation or the complaints forwarded by the project GRC or by the PAPs unsatisfied with decision of the project GRC. The complaints will be registered and acknowledged to PAPs and addressed after investigating the facts and hearing the complainants.
- Facilitate information dissemination and consultation with PAPs including men, women and vulnerable groups in subproject towns on all matters affecting PAPs to ensure compliance with the requirements of the RPF, World Bank's Social Safeguard Policies and Land Acquisition Act 1894.
- Mobilize and facilitate the PAPs to process their compensation claims and receive compensation and coordinate with and support the LAC and Project Director throughout compensation disbursement process in office and field during preparation of claims and issuance of compensation vouchers against land and land based assets under LAA provisions and compensation cheques for entitled R&R allowances and income restoration measures under RAP provisions;

- Prepare sector-specific checklists, guidelines, reporting formats, and reports
- Monitoring and evaluation of the implementation of the plans or studies.
- Develop, organize, and deliver training programs and workshops to agencies/entities implementing the Project, local governments or affected stakeholders.
- Prepare a bi-annual Implementation Report on the progress and status of the implementation of the safeguard instruments
- Conduct or supervise safeguards compliance reviews of each subproject.
- Prepare safeguard progress and performance reports.
- Recruit safeguard training personnel or agencies.
- Keep the social management framework updated, based on the project's operational experience.

The PMU at LGD will play a central role in ensuring that LCs comply with the procedures of the SMF / RPF in the screening, selection, design and implementation of subprojects. It will manage and provide a package of centralized technical assistance (TA) and capacity-building support to LCs, and for the development of critical systems to achieve annual performance measures– including systems for environmental and social safeguards management, and on investment planning, citizen engagement and access to information. It will provide assistance to LCs in screening, selection, design, supervision and monitoring of subprojects, through in-house expertise and by hiring consultancy services. It will also provide assistance to all LCs in the preparation and implementation of environment and social management plans / safeguard instruments for LCs' subprojects consistent with the SMF / RPF. LGD will also engage consultancy services for third party monitoring of progress of subproject implementation (including compliance with safeguards instruments); and for development and implementation of a communication campaign based on a stakeholder engagement strategy to raise awareness of the scope and impacts of the project. LGD will also submit consolidated subproject proposals to the Bank for review and no-objection, on behalf of all LCs.

5.3.1.2 Grievance Redress Committee

A project wide Grievance Redress Mechanism (GRM) will be set up for all subprojects under the investment program to address grievances arising from social and environmental impacts. The GRM will have a two-tiered structure at the subproject level and another third tier at the executing agency level, enabling immediate local responses to grievances and higher-level review addressing more difficult cases not resolved at the local level. At project/subproject level, a grievance redress committee will be established to operationalize the GRM at the PIU level. The formation of GRC and its functions will commensurate with subproject needs and requirements and will be elaborated in each subproject RAP.

5.4 Supervisory Consultants

KMC will engage Supervisory Consultants having adequate human resources for assisting KMC and PIU in safeguards planning and preparation, implementation and monitoring of RPF. The Supervisory Consultants will mobilize a team of qualified resettlement specialists with experienced enumerators and surveyors for impact assessment, census, SES surveys and conducting meaningful consultations during project design stage who will facilitate the PIU in updating the RPF (if required) or draft RAPs prepared based on feasibility level design for subprojects. Overall social management responsibilities of the SC include:

- Undertake the screening of each subproject and identify main social impacts and prepare project descriptions;
- Undertake adequate consultations with affected people and studies of the subproject area to identify baseline conditions and impacts;
- Coordinate with PAPs and other stakeholders including line government departments and CSO and conduct meaningful consultation with all PAPs and other interested stakeholders on the LAR related issues and maintain a record of the consultation including consultation meeting attendance sheets, pictures and meeting minutes;
- Coordinate with line government departments at District and Town level including Land Revenue Department, Forest Department and Agriculture Department as well as with local community, property agents and appraisers for asset (land and other assets) valuation and compensation calculation in a manner consistent with this RPF provisions;
- Ensure that land acquisition activity after publication of Section 4 is followed by updating land records and land price assessment is reflective to current market rates following procedures outlined in this RPF;
- Coordinate and facilitate the negotiation committee in case the land is acquired through private negotiation and assist the committee for determining the base market value and communicating with PAPs for private negotiations; assist the negotiation committee to document the negotiations process and retain the meeting record including attendance sheets, meeting minutes and pictorial presentations etc.; and facilitate negotiation committee and the PAPs to finalize and execute sales deed if negotiation is successful;
- If negotiation is not successful, coordinate with the local land revenue authorities for completing land acquisition process under LAA provisions, participate in Price assessment Committee meetings at each district to clarify replacement value/cost and ensure the assessment is fully reflective of current market value arrived following provisions of this RPF and LAA procedures;
- Monitor day to day LAR implementation progress and prepare monthly progress reports and periodic social monitoring reports including consolidated progress of RAP implementation and social management achieved during monitoring period;
- Provide technical assistance and training to the SSMC, line departments, SEPA and contractors and advice on appropriate modifications to improve their effectiveness; and
- Assist PIU in preparing bi-annual subproject reports on the RPF implementation, to be submitted to the Steering Committee and the World Bank.

5.5 The District Government Departments

RPF management requires support from various line department and government agencies. The jurisdiction and functions for land administration, valuation, acquisition and compensation rests with provincial Board of Revenue which exercises its jurisdiction and functions through its Divisional and District Officers including Commissioner, Deputy Commissioner/District Officer Revenue and Land Acquisition Collector at district and town level. All land acquisition affairs, including publication of notifications under LAA provisions, identification and assessment of land, determination and delivery of compensation for land acquired under law rest with the LAC.

Functions pertaining to assessment of compensation of non-land assets rest on Provincial line-agencies and their District level offices. Assessment of compensation for, buildings' and other

built infrastructure pertains to the buildings with SBCA. The compensation for wood trees losses is assessed by the Department of Forestry.

5.6 Roles of the Contractor

The contractor(s) to be employed to undertake construction works will also have a role to play in the implementation of the subprojects. The contractor's roles will include the following:

- Develops a work plan based on the social safeguards;
- Submits the plan of work and schedule to the PMU, CLICK;
- Train/create awareness for all personnel and community on relevant social safeguards measures; and
- Submits implementation report on social safeguards to the PMU.

5.7 Independent Monitoring Agency (IMA)

KMC will hire an agency or an individual expert (with team) to conduct independent monitoring and evaluation (the IMA) for the implementation of RAP. The IMA shall review the implementation progress throughout the RAP implementation and evaluate the level of achievement of RAP objectives, identify gaps, if any, and propose remedial measures for implementation. The IMA shall be a firm hired either for all Project under the investment or for individual subprojects.

5.8 Project Affected Person Committees (PAPC)

PAPCs of men and women PAPs will be established at each subproject site through community mobilization. The community mobilizers will play a key role in constituting these PAPCs.

PAPCs will be involved in planning and implementation of the RAP, most specifically in:

- finalizing the exact alignment and layout of the physical infrastructure;
- assessing of permanent or temporary losses of assets
- preparing the inventory or listing of crops, trees and other assets falling within the ROW to ensure transparency and fairness;
- establishing unit rates for compensation;
- monitoring payment of compensation for loss of assets and livelihood to individuals;
- implementation of livelihood restoration and enhancement or substitution measures; and
- Grievance redress

An institutional set-up involved in LAR management at national, provincial, KMC and project level is presented in the **Figure 2.**below.

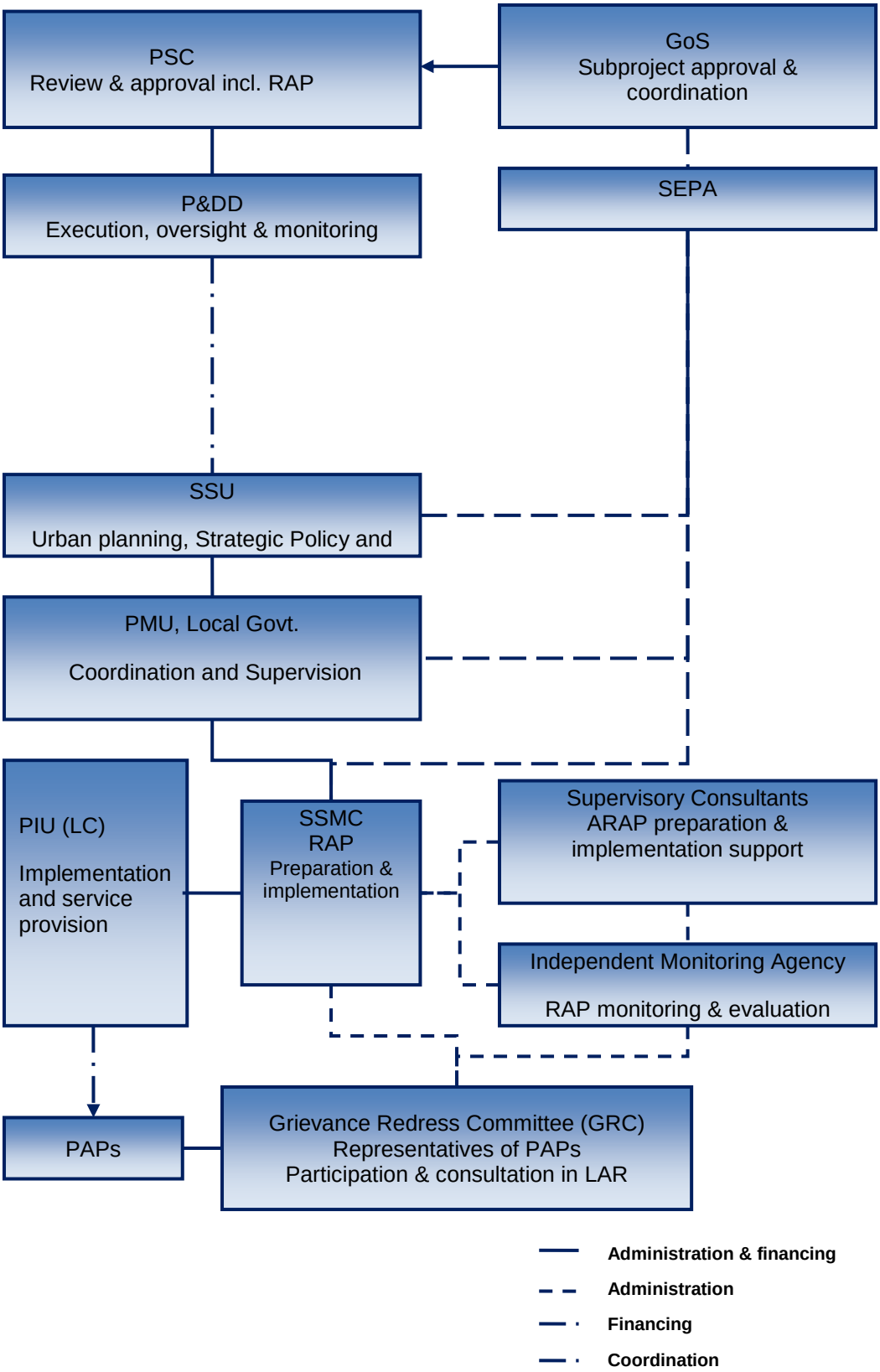


Figure 2: Institutional Setup for Project and RAP Implementation

6 GRIEVANCE REDRESS MECHANISM (GRM)

The project level Grievance Redress Mechanism (GRM) will be set up for all subprojects under CLICK to address grievances arising from social and LAR impacts. This RPF determines the structure, roles and functions of the GRM, through grievances arising due to LAR related impacts can be addressed in each subproject. These will be further specified in each subproject RAP.

The purpose of the GRM with regard to LAR is to receive, review and resolve grievances from physically and economically displaced persons and thereby, facilitate the fair implementation of this updated RPF and the related subproject RAPs. In accordance with the GRM mechanism, adequate grievance mechanism will be available for PAPs having grievances regarding any decision, practice or activity arising from land or asset assessment, acquisition, compensation, resettlement or rehabilitation or related issues.

The GRM will be set up with a two tiered structure; one at APC level enabling immediate local responses to grievances and another at PIU level for higher-level review addressing more difficult cases not resolved at the PIU or local level. To ensure that all geographic reaches and relevant administrative units involved in the subproject are covered, the GRM will set up (i) a local mechanism in each affected town with grievance redress focal points; (ii) a grievance redress committee (GRC) at PIU as applicable and useful.

PAPs will be fully informed of their rights under the statutes, i.e., Land Acquisition Act 1894, and World Bank Policy on Involuntary Resettlement and of the procedures for addressing complaints whether verbally or in writing during disclosure of LAA notifications and other LAR information including summary of draft RAPs. Care will always be taken to prevent grievances rather than going through a redress process. This can be done through careful LAR design and implementation, by ensuring full participation and consultation with the PAPs, and by establishing extensive communication and coordination between the community, the PMU, PIUs, the LAC and PAPCs.

The grievance redress committee will include Project Director as convener, the Social Safeguard Specialist and Social and Gender Specialist, In-charge Compliant Cell, and a member nominated from NGO and PAPC. While at local level APC will be assisted and supported through social mobilizers to make effort for resolving the issues at local level before its upraising to the project GRC.

Any complaints unresolved at village level will be forwarded to the GRC in the PIU by the SSMC or the complainant himself. The complaints received will be properly recorded and documented at PIU by a designated staff in the Complaint Register. The information recorded in the Register will include date of the complaint, particulars of the complainant, description of the grievance, actions/steps taken/to be taken to resolve the complaint at village level, the person responsible to take the action, follow up requirements and the target date for the implementation of the mitigation measure. The register will also record the actual measures taken to mitigate these concerns. The aggrieved PAP will be kept informed about the actions on his complaint. He/she will be facilitated/ paid by the subproject to participate in the proceedings at different levels of grievance resolution process.

Each RAP will be included specific complaint and grievance redress mechanisms to mediate conflict in order to avoid lengthy litigations arising from land acquisition, valuation, compensation and resettlement process. To enable a PAP to appeal against any disagreeable LAR related decision, practice or activity the following grievance redress mechanism will be instituted explained below and also portrayed in **Figure 3**.

Step1: Grievances of PAPs will first be brought in writing to the attention of the concerned APC. Resolution is sought within 10 days at the local level through the involvement of the SSMC, the social mobilizer to maintain regular contact with the APCs and to be the first line of contact on issues related to LAR. Partner NGO and mediators from among the community.

Step 2: The grievances not addressed at the local level, if it is related with resettlement rehabilitation assistance and income losses the compliant can be lodged with GRC at PIU who will respond within 21 days. For land and crop compensation issues can be lodged with the Office of the LAC, who will seek to resolve the grievance within 30 days. The PAP must produce all relevant documents supporting her/his claim.

Step 3: If the grievance redress mechanism fails to satisfy the aggrieved PAP, he/she can submit the case to the appropriate court of law as set out in sections 18 to 22 of the LAA (1894).

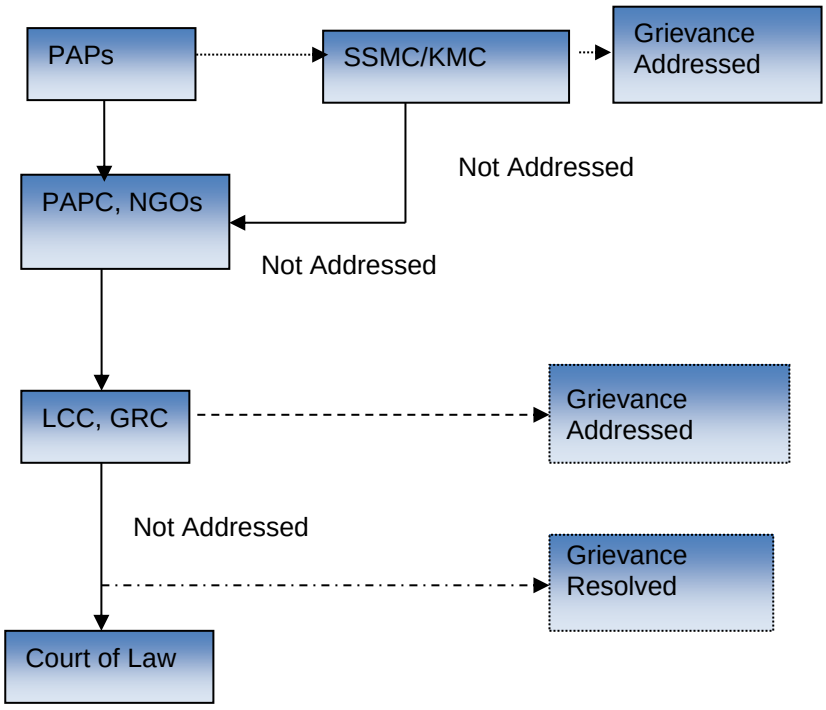


Figure 3: The Process of Grievance Redress

To address GBV-related complaints, PIU will make certain the availability of a GBV-sensitive GRM to integrate protocols related to SEA to address a complaint. The social and gender specialist in the PIU will be the focal person for properly handling GBV allegations including the identification of SEA risks and define commensurate mitigation measures; the identification of partner which can provide timely services of SEA; seeking support from various service providers such as Madadgar and CPLC helplines to enact sanctions to be applied to the perpetrator. The PIU will undertake comprehensive measures to mitigate project-related SEA risks from the anticipated labour influx. The PIU should have specific procedures for GBV including confidential reporting with safe and ethical documenting of GBV cases.

7 COMPENSATION, INCOME RESTORATION AND RELOCATION

7.1 Compensation for Lost Assets

PAPs losing land, structures (residential or commercial), assets, income, crops, trees; are entitled for compensation and rehabilitation subsidies, including a relocation subsidy, and a business losses allowance; based on tax declarations and/or lump sums, in case of non-availability of such documentation, in accordance with the minimum wage for unskilled worker announced by the Government of Pakistan for 2017-18. The impacts under this RPF are defined as partial and full. The partial impacts are those where a structure will not lose its current use and remains useful after rehabilitating the affected part. The full impacts are those where after demolishing the affected part, the remaining structure becomes redundant for its present use.

7.1.1 Compensation for Land

7.1.1.1 Agricultural land

Titleholders (recorded land owners) or those having land rights recognizable under local law or custom will be compensated for acquired land either through replacement land parcel of similar type and size (if available) or through cash compensation at full replacement costs including fair market value, transaction costs, interest accrued and other applicable payments for acquired land parcel. For determining compensation on replacement cost, the efforts will be ensured for negotiated settlement of land cost and if it is unsuccessful, the process for compulsory acquisition of land will follow and the compensation package may include fair market value of land and other entitled compensation as outlined in Section 23[94] of LAA 1894 with a 15% compulsory land acquisition[95]surcharge.

Those informal land users without traditional/recognizable rights and encroachers losing land, will not be entitled to compensation but will be provided compensation for their assets other than land or improvements (if any) made to land. In case of arable land, they will be provided an income rehabilitation allowance in cash equal to the net market value of yearly harvest income based on relevant cropping pattern and cultivation record (additional to standard crop compensation), and compensation for any irrigation infrastructure and other improvements made to the land (but not for the land) at full replacement cost; and other appropriate rehabilitation to be defined in the RAPs based on project situation and PAP consultation.

Leaseholders or tenants on government land who are registered as per land records/cadasters (if any) will be entitled to either renewal of the lease/tenancy agreement in other plots/parcels of similar type and size or cash refund equivalent to paid lease amount for remaining lease period or mutually agreed period up to a maximum of two years in addition to the standard crop compensation allowed as per entitlement for crop losses. In addition they will be entitled for compensation on replacement cost basis for improvements (if any) made to the acquired land.

Lease holders/Rental Tenants on privately owned arable land will receive a cash refund at the rate of the rental fee proportionate to the size of the affected plot and the duration of the remaining lease period but maximum up to three years and will also be entitled to crop compensation for lost crop and an additional crop. The sharecroppers on privately owned land will be entitled to crop compensation as per their respective share with the land owner based on their

Section 23 sub section (1) of LAA require to determine compensation package including , fair market value, costs in consequence of severance, costs for loss of earning or profit the costs for lost fixed assets other than land etc.

[95] Additional Compensation entitled under section 28.

sharecropping contract and the compensation in cash will be equivalent to the market value of the gross yield of lost harvest and one additional crop compensation. In addition they will be entitled for compensation on replacement cost basis for improvements (if any) made to the acquired land. Agricultural laborers, with contracts to be interrupted, will be provided with compensation equal to their salary/daily wage or minimum wage rate.

Residential, commercial, public and community land

For partial loss of a plot/percent of the total land parcel (taking into account functional viability of remaining land), owners-defined as titleholders or legalizable users will receive cash compensation at replacement cost according to the quantity and quality of the land lost, including all transaction costs. Lessees or rental tenants of residential land will receive a cash refund at the rate of the rental fee proportionate to the size of the affected plot and the duration of the remaining lease period. Non-titled land users/squatters or encroachers on affected land will not be entitled for compensation for partial loss of acquired/affected land but will be provided with compensation to the extent of improvements (if any) made to the land and rehabilitation/resettlement assistance to offset adverse impacts if any or provision of access to remaining land parcel on secured tenure basis.

For full loss of a plot/percent of the total owned plot (taking into account functional viability of remaining plot), owners may choose between either (i) land for land compensation through the provision of a fully titled and registered replacement plot of comparable value, quantity and quality as the lost plot at a relocation site for the displaced community or another location agreeable to the PAP or (ii) cash compensation at replacement cost according to the quantity and quality of the land lost. In either case all transaction costs, such as applicable fees and taxes, will be borne by the IA. Lessees or rental tenants will receive a cash refund at the rate of the rental fee for the duration of the remaining lease period for the entire lost plot. Non-titled land users squatting or encroaching on affected land will not be entitled for land compensation, but will be provided with compensation to the extent of improvements (if any) made to the land, rehabilitation/resettlement assistance for self-relocation and to offset adverse impacts if any or provisions of access to land parcel of same size and type either in relocation site or on any other available place on secure tenure basis.

Temporary Occupation of Land

Temporary occupation of land if required for a short term to maintain diversions for uninterrupted traffic flows during execution of civil works will be procured on temporary lease arrangement through negotiated settlement following the provision of LAA 1894. In case of temporary requisition of land, the owners, lessees and tenants will receive a rental fee commensurate with current local land rents for the period of occupation of the land. All PAPs so affected will have guaranteed access to their land and structures located on their remaining land and their land will be restored to its original state. Besides, some temporary land may be required by the civil works contractor for construction campsites, equipment and stockyards. In case of requisition by the contractor, the terms and conditions of such requisition will be agreed between the contractor and land owners and accordingly private lease agreement will be signed between the Parties. However, the IA will ensure that the compensation provisions in such private lease agreements are fully consistent with the RPF provisions.

Structures (Residential/Commercial and Other)

For the partial loss of structure: The partial structure loss will be determined based on functional/economic viability of remaining structure or possibility for its restoration and to put it into the same use as was before the project. In case of partial loss of structure the owners,

including non-titled land users/squatters, will receive cash compensation for the lost parts of a structure at replacement cost and for the repair of the remaining structure at the market rate for materials, labor, transport and other incidental costs, without deduction of depreciation for the age of the structure. They have the right to salvage all usable materials from the lost structures. Lessees and rental tenants receive a cash refund at the rate of the rental fee proportionate to the size of the lost part of the structure and the duration of the remaining lease period.

For the full loss of a Structures: In case of complete loss of structure or loss to the extent that the remaining structure becomes functionally/economically unviable for use and its restoration and putting into earlier use is not possible, the owners legal and legalizable, may choose either (i) the provision of a fully titled and registered replacement structure of comparable value, quantity and quality, including payment for all transaction costs (such as applicable fees and taxes), at a relocation site or another location agreeable to the PAP, or (ii) cash compensation at replacement cost, including all transaction costs (such as applicable fees and taxes), without deduction of depreciation for age, for self-relocation. If the market value of a replacement structure is below that of the lost structure, the owner will be paid cash compensation for the difference in value without deduction of depreciation for age. If the market value of the replacement structure is above that of the lost structure, no further deductions will be made. In either case the owners have the right to salvage all usable materials from the lost structures. While the non-titled land users/squatters will be compensated either through cash compensation for structure on full replacement cost and rehabilitation/resettlement assistance for self-relocation to the place of their choice or will be provided with replacement structure on secured tenure basis in the resettlement site developed for the project. Lessees and rental tenants will receive a cash refund for the rental fee equivalent to the paid advances (if any) and the period for which rent is paid or the remaining lease period but maximum up to 12 months.

If minor structures, such as fences, sheds or latrines, need to be moved, their owners or the lessees and tenants, depending on the arrangements between owners and tenants, may either (i) receive cash compensation for self-relocation of the structure at the current market rate for the cost of labor, materials, transport and other incidental costs, as required, without deduction of depreciation for age, or (ii) the structure may be relocated by the subproject.

For stalls and kiosks or other temporary commercial structures like Kiosks, thatched huts and cabins whether titled or licensed or not, alternative sites comparable in business potential to the lost location will be provided and the vendors will receive cash compensation for self-relocation of their stalls at the current market rate for cost of labor, materials, transport and other incidental costs, as required, without deduction of depreciation for age.

Crops

All affected land owners/users will be entitled for one year crop compensation, i.e., two crops (one lost crop and other crop for ensuing season) to offset any adverse impacts to their income/livelihood due to accrued crop losses because of acquisition of land. The entitlement for crop losses will link to the cultivators including landowners (self-cultivators), leaseholders/sharecroppers and encroachers/squatters etc. Cultivators of affected crops will be paid cash compensation for the loss of a crop proportionate to the arable/cultivated area of lost plot on the bases of current market rate assessed on gross product value of the grown crops or as assessed and provided by the competent government agricultural department. The second crop (crop for ensuing cropping season) will be paid on net product value proportionate to the cultivated area for the first paid crop. In case of share cropping arrangement between the parties, the compensation so assessed will be apportioned between the parties as per share cropping arrangement (either legally stipulated or the traditionally or informally agreed) they had.

Trees

Cultivators of affected fruit trees will receive cash compensation at full replacement cost for lost fruit trees assessed at the current market rate of product value multiplied by a i) period required to grow a new tree to the age of production or ii) average years of crops forgone. The required number of years to grow a fruit plant to production age can be different for different tree species however, for compensation purpose five years period can be taken as standard and the compensation cost could be calculated by multiplying this standardized period with average production potential and current market rates of the product. In addition, the cost of purchase of seedlings and required inputs to replace these trees will be paid. For timber trees, cash compensation will be paid at the current market rate of the timber value of the species at current volume, in addition to the cost of purchase of seedlings and required inputs to replace the trees. However, the rates and valuation methods will be determined using the accepted methodology in use at the Departments of Agriculture and Forestry in each district of Karachi.

7.1.2 Resettlement& Relocation

Land for land compensation

Land for land compensation has significant advantages in that it reduces the chance of displaced people spending their compensation on items that will not provide them with an alternative economic livelihood. Therefore, preference will be given to land-based resettlement strategies for displaced persons whose livelihoods are land-based. These strategies may include resettlement on public land, or on private land acquired or purchased for resettlement. Whenever replacement land is offered, displaced persons will be provided with land considering productive potential, locational advantages, and other factors to ensure the replacement land is at least equivalent to the advantages of the land taken. If land is not the preferred option, or sufficient government land is not available and acquisition of suitable resettlement land is not possible, non-land-based options built around opportunities for employment or self-employment will be considered in addition to cash compensation for land and other assets lost.

Relocation assistance

Where applicable, the PAPs will be provided logistical support for the identification and purchase or rental of replacement plots and/or structures, or the construction of new structures, as the case may be, as well as with all related administrative tasks. The physically displaced persons will be relocated at a relocation site or will self-relocate at individual sites and structures of their own choice.

Security of tenure

Arrangements for secure tenure to the replacement land and structures will be made and their provision to each PAP, according to the level of eligibility of each PAP, will be ensured.

Transport allowance

All PAPs to be relocated due to loss of land and/or structures including residences, business premises or agricultural land, are entitled to receive a cash allowance to cover the cost of transport of people and their movable property (furniture, household items, personal effects, machinery, tools etc.) and of setting up at the new premises at the current market rate for labor, vehicle hire, fuel and incidental costs. A lump sum amount of compensation (covering all items discussed) will be provided to the PAPs.

Transition allowances

The affected households facing interruption in livelihood earning during period required to re-establish or relocate their lost residential/commercial structure will be entitled for transitional support up to a period of three months. Such transitional support/allowance will be based on officially designated minimum wage rates and shall be paid to household head. This transitional support will be in addition to the compensation entitlement for business or income losses for any of the household member or PAP.

Besides rental assistance (residential and commercial) will also be provided as transitional support to facilitate the PAPs for temporary relocation of their assets and continue their activities while the replacement assets are provided or the partially damaged structures are restored to their original use. This rental support will be computed in consultation with PAPs on the basis of prevailing rental value of the affected assets or market rental values of available asset in the relocation site and will be paid as such for a period as agreed. The period required to re-establish partially affected asset or construction of similar new will be determined during preparation of respective subproject RAPs and the rental assistance will be elaborated based on consultations with the PAPs and other stakeholders.

7.1.3 Income Restoration Measures

In addition to the compensation entitlement for acquired assets and corresponding relocation and resettlement costs, the PAPs facing significant loss of productive assets/livelihood source will be entitled to the income restoration measures as explained below.

Loss of agriculture based livelihood

In case partial but significant[96]loss of arable land without provision of alternate land but with remaining land functionally viable, in addition to cash compensation for the loss of land as indicated above, the displaced persons (owner, lessee, sharecrop tenant or non-titled user) of land will be provided with financial support for investing in productivity enhancing inputs like land levelling and erosion control, irrigation infrastructure, farming tools, fertilizers and seeds etc. as feasible and applicable. Meanwhile, additional financial support in the form of grants and micro-credit will be available, if the compensation for partial land loss is insufficient to allow for adequate investments to maintain the PAP's livelihood.

For the full loss of arable land without provision of alternative land, in addition to cash compensation for the loss of land as indicated above, the PAP (owner, lessee, sharecrop tenant or non-titled user) of land will be provided with subproject based job-placement or training on alternate employment opportunities as well as with organizational and logistical support to establish the PAP in an alternative income generation activity. If possible, IA will coordinate and/or cooperate with governmental and non-governmental income generation and micro-enterprise development initiatives.

Uninterrupted access to resources and means of livelihood

The subprojects and IA will ensure that access of the PAPs to their aboding places and livelihood sources like agricultural fields, business premises remain open and unrestricted during execution of the project works. To achieve the objective, either obstruction to any known access route will be avoided or alternate access will be provided in technical design as integral to subproject facilities. The relevant subproject RAPs will elaborate on specific anticipated impacts and outline measures to ensure access.

[96]More than 10 % of productive arable land.

7.1.4 Businesses Loss

For the loss of business income (temporary or permanent) due to LAR or construction activities by the project, the owner of a business will receive cash compensation equal to the lost income during the period of business interruption up to three months if loss is temporary and reversible and up to six months if the loss is permanent, based on business turn over or tax records produced or in case of non-production of record, comparable rates from registered businesses of the same type in same area with tax records available. However, if tax based lost incomes are unknown, then official designated minim wage rate will be used as base rate to compute compensation for affected households. For permanent loss of business in addition to compensation, opportunities for project based job or training to alternative livelihood sources with organizational and logistical support to establish the PAP in an alternative income generation activity will be worked into and elaborated in the respective RAPs. For this purpose, relevant governmental and non-governmental organization will be coordinated and their support will be sought.

7.1.5 Employment

The loss of employment due to LAR or construction activities among all laid-off employees of affected businesses will be compensated through cash compensation equal to the lost wages during the period of employment interruption but maximum up to three months, based on registered wages or tax records if available or based on officially designated minimum wage rate or poverty line (inflation adjusted), if tax based lost incomes are unknown. The PAPs facing employment loss due to lost assets like agricultural land and business enterprises will be documented and the income restoration provisions will be elaborated in the respective RAPs.

7.1.6 Special Provisions for Vulnerable PAPs

All vulnerable PAPs, in addition to applicable compensation for lost assets, including relocation and income restoration as explained in above sections will be entitled to livelihood restoration/improvement support in the form of cash and preference to project based employment or training with additional financial support and micro-credit facilities as well as organizational and logistical support to establish the PAP in an alternative income generation activity. To facilitate the process of training and establishment of a new income generation activity a subsistence allowance equal to three months income computed based on officially designated minimum wage will be paid in addition to any income loss compensation and transition allowance, as applicable. Apart from support of the government departments, other resources like support from NGOs will be sought to assist PAPs for additional financial support and micro-credit facility and accessing the organizational and logistic support to establish alternative means of livelihood. Moreover provision related to preference for project related employment will be reflected in the civil works contracts as well as the agreements between the project executing agency and the WB.

7.2 Public Services and Facilities

Public services and facilities interrupted and/or displaced due to LAR will be fully restored and re-established at their original location or a relocation site. All compensation, relocation and rehabilitation provisions of this RPF are applicable to public services and facilities. These include but are not limited to schools, health centers, community centers, local government administration, water supply or graveyards

Compensation, relocation and resettlement rehabilitation assistance is summarized in the **Table 4.**

Table 4: Eligibility and Compensation Entitlement Matrix

Type of Loss	Specification	Eligibility	Entitlements
1. LAND			
Permanent impact on arable land	All land losses independently from 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 (RC[97]) either through negotiated settlement between the EA and the land owners or assessed based on provisions of Section 23 of LAA including fair market value plus damages/costs applicable free from taxes and levies plus 15% compulsory land acquisition surcharge (CLAS) from publication date of section-4 to the date of compensation. • If BoR[98] compensation falls below RC, the project will pay the differential as resettlement assistance to the PAPs to restore affected livelihoods. • Resettlement Assistance if the impact is 10% or more of productive resources including arable land.
		Leaseholder titled/untitled	• Compensation commensurate to lease type and as appropriate for recovery of paid advance or paid lease amount for the 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 and other appropriate rehabilitation to be defined in the RAPs based on project specific situation and PAP consultation.

[97] Refer to OP 4.12
[98] Board of Revenue, provincial agency with a mandate to approve compensation rate/amount

Type of Loss	Specification	Eligibility	Entitlements
Residential/ commercial land	All land losses independently from 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 • If BoR compensation falls below RC, the project will pay the differential as resettlement assistance to the PAPs to restore affected livelihoods. • Additional compensation to be worked out in consultation with PAPs if the loss is 10% or more of productive resources including land.
		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 PAPs.
		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 parties; • 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, public, community	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. • Right to salvage materials from lost structure • For vulnerable households, provide legal and affordable access to adequate housing to

Type of Loss	Specification	Eligibility	Entitlements
			improve their living standard to at least national minimum standard. • Any improvements made to a structure by a lessee/tenant will be taken into account and will be compensated at full replacement cost payable through apportionment between owner and the tenant as agreed at consultation meetings.
		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 PAP 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 any case, PAP 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, and • 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	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

Type of Loss	Specification	Eligibility	Entitlements
			over past 3 years or as assessed through the respective Agricultural Departments. • Additional compensation to be worked out in consultation with PAPs if the loss is 10% or more of productive resources including land.
		Parties to sharecrop arrangement	• Same as above and distributed between land owner and tenant according to legally stipulated or traditionally/informally agreed share
4. Trees	Affected crops	Land owner/ 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 land owner and tenant according to legally stipulated or traditionally/informally agreed share
5. RESETTLEMENT & RELOCATION			
Relocation Assistance	All types of structures affected	All PAPs titled/untitled requiring to relocate as a result of losing land and structures	• The project will provide logistic support to all eligible PAPs in relocation of affected structures whether project based relocation or self-relocation as opted by the PAPs. • If project based relocation, PAPs 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 PAPs and tenants needing to relocate to project relocation sites.	• If PAPs 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 PAPs and tenants required to relocate as a result of losing land and structures	• For residential structure a lump sum amount of Rs. 15,000/ or higher depending upon the situation on ground. • For commercial structure or agricultural farm structure a lump sum amount of Rs. 10,000/ or higher depending upon the situation on ground.
House rent	All types of structures	All PAPs and tenants required to relocate as a	• Rental assistance as a lump sum amount computed on the basis of prevailing rental rate for a period as agreed between the PAP and project

Type of Loss	Specification	Eligibility	Entitlements
	requiring relocation	result of losing land and structures	team, to assist the PAPs in renting house or commercial structure.
Transition allowance	All types of structures requiring relocation	All PAPs and tenants required to relocate	• On a case to case basis, transitional allowance equal to 3 months of recorded income or equal to officially designated minimum wage rate.
6. INCOME RESTORATION			
Impacted land-based livelihoods	All land losses	All PAPs with land-based livelihoods affected	• Land for land compensation through provision of plots of equal value and productivity as that of lost and if land based compensation is not possible non-land-based options like built around opportunities for employment or self-employment will be provided in addition to cash compensation at full replacement costs for land and other assets lost. The following entitlements will apply if replacement land is not available or is not the preferred option of the PAPs: • **Partial loss of arable land:** PAPs 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 PAPs 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 PAPs	• Un-interrupted access to agricultural fields, business premises and residences of persons in the project area will be ensured in consultation with the PAPs.
Businesses	Temporary business loss due to LAR or construction activities by Project	Owner of 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 tax record or, in its absence, comparable rates from registered businesses of the same type with tax records, or computed based on officially designated minimum wage rate.
	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 tax record or, in its absence, comparable rates from registered businesses of the same type with tax records, or computed based on officially designated minimum wage rate And • Provision of project based employment to one of the grown household member or re-training with opportunity for additional financial grants and micro-credit and organizational/logistical support

Type of Loss	Specification	Eligibility	Entitlements
			to establish PAP in alternative income generation activity
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 PAP 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 PAPs	Livelihood improvement	All vulnerable PAPs including those below the poverty line, the landless, the elderly, women and children	• In addition to applicable compensation entitlements for lost assets, relocation and livelihood restoration under section,1 to 7 the vulnerable PAPs 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 RAPs based on income analysis and consultations with PAPs. • Preference for provision of project based employment.

8 LAND ACQUISITION AND RESETTLEMENT FINANCING AND IMPLEMENTATION.

8.1 LAR Cost estimation and Budgeting

The allocation and provision of the financial resource is responsibility of the IA for affective management of project LAR requirements including acquisition of ROW land free from encumbrances, establishment of relocation/resettlement sites, payment of compensation for acquired assets, entitled relocation and resettlement costs and implementation of income restoration measures etc. Hence, the land acquisition, compensation, assistance, relocation and rehabilitation of income and livelihood will be considered as an integral component of project costs and will be accordingly estimated and included in the project PC-1 to ensure adequate funds are made available. All land acquisition funds will be provided by the KMC from counterpart financing share of the government and the loan proceeds will not be used for land acquisition purposes. However, for establishment of relocation sites and implementation of rehabilitation and income restoration measures LGD and LCs can request World Bank to consider financing rehabilitation and income restoration component of the RAPs.

The LAR costs will be precisely assessed and reflected in the itemized RAP budget including compensation costs for acquired land and other assets, applicable relocation, resettlement and income restoration costs as well as administrative costs including costs for RAP implementation institutional arrangement, monitoring and evaluation and the contingencies. All assessed LAR costs should be fully incorporated in the project PC-I to be approved by the government to ensure the LAR funding could be ensured in approved PC-I of each project/subproject.

8.2 Flow of Funds for RAP implementation

GoS will allocate sufficient funds to LGD (or LCs if needed) for LAR management and release these based on finalized PC-I including LAR costs for the subprojects to be executed under the Project. The IA will transfer the funds for all land acquisition costs of a subproject to the district treasury department for acquisition of land and assets as per estimated demands by LAC and PIU account for delivery of R&R and income restoration costs and other entitled allowances not covered under applicable LAA procedures in Pakistan. Timely funding and deposit of LAR costs for acquired asset and resettlement and rehabilitation costs as budgeted in the subproject RAPs will assist PIU in timely completion of LAR activities, taking possession of the acquired assets and ROW and handing over the ROWs land, free from encumbrances, for commencement of project civil works.

8.3 Compensation Disbursement

The Compensation for land and land based assets covered under land award will be disbursed by the LAC through vouchers debit able to the district treasury, while the entitled R&R costs and allowances will be paid by issuing crossed cheque in the name of the entitled PAP by the PD, PIU which will be charged to the project account. The disbursement process of compensation of acquired assets (land and land based assets) will start after announcement of land awards under LAA provisions and the payment process for other entitlement covered under RPF and RAP could be paid as and when the final implementation ready RAP prepared based on detailed design is reviewed and cleared by World Bank. Nonetheless, the disbursement will take place, after due notification of time and place to the PAPs and the PAPs will be assisted and mobilized to get the requisite support documents for processing of their claims and delivery of compensation accordingly. For transparency purposes the efforts will be ensured to pay the compensation

thorough bank accounts by delivering cross checks or compensation vouchers, which may be cashed or deposited at district treasury or any designated local bank.

World Bank OP 4.12 and provisions under this RPF requires to ensure that no physical displacement or economic displacement will occur until (i) compensation for acquired assets at full replacement cost has been paid and other entitlements listed in the resettlement plan have been provided to each displaced person (PAP) for project components or sections that are ready to be constructed; and (ii) a comprehensive income and livelihood rehabilitation program, supported by an adequate budget, is in place to help PAPs improve, or at least restore, their incomes and livelihoods. Pakistan's Land Acquisition Act (1894) allows the government to take possession of the acquired land once land award has been made as per LAA Section 11, and payment has been made or deposited to the court as per LAA Section 31. Accordingly, the Collector is required to pay the full amount to the PAP, unless (a) the PAP refuses to receive the amount, (b) there is no competent person to receive the compensation, or (c) if there is a dispute as to the title to receive the compensation.

Under World Bank OP 4.12, compensation for both land and non-land assets is deemed to have been paid when the amount in cash or cheque has been provided to PAPs or deposited into their bank account, or is secured in an escrow account for PAPs not showing up to collect compensation. While in case of LAA, if the PAPs or their representatives did not come forward to collect their compensation, the amount could be deposited in the Revenue Department payable to the PAPs, after exerting due efforts to contact and encourage them to appear and notifying the PAPs in which treasury the deposit has been made. However, in both cases depositing the compensation in an escrow account, or in district treasury in lieu of providing cash or cheque to the PAP is justified only when sufficient good-faith efforts and all legal requirements for contacting and notifying the PAPs have been made.

Nevertheless, both the LAA (1894) and World Bank OP 4.12 require that PAPs are compensated before displacement, but allow a mechanism for dealing with cases having legal and administrative impediments restricting disbursing compensation payments provided that sufficient good-faith efforts are demonstrated in (a) contacting, notifying and assisting PAPs, and (b) delivering compensation payments. So in cases where compensation payment is restricted due to legal and administrative impediments faced by the PAPs, the EA will follow the World Bank's policy.

8.4 RAP Implementation Schedule and Commencement of Works

The RAP preparation and implementation schedule will vary from subproject to subproject based on readiness level of subproject design and LAR requirements. In general, the project implementation will consist of the three major phases, namely project preparation, land acquisition and final/updated RAP preparation and implementation of RAPs, i.e., full payment of compensation for acquired assets and entitled resettlement and rehabilitation cost to PAPs with income restoration measure in place. In line with the principles laid down in this RPF, IA will prepare a detailed implementation schedule as integral part of each RAP indicating the sequence and time frame of activities for acquisition of land, preparation of draft and implementation ready RAPs for each subproject under different phases and RAP implementation timelines synchronized with the construction schedule for each subproject.

Efforts will be ensured to synchronize and streamline the land acquisition process under LAA provisions and impact assessment, census and socio-economic assessment as well as preparation of implementation ready RAPs for each subproject for effective LAR management under provisions of this RPF. While RAP implementation timelines will be synchronized with the

construction schedule to ensure RAP implementation is completed before commencing of Civil Works and timely execution of the subprojects under the Project. Nonetheless, the commencement of civil works for any subproject or any of its section with LAR impacts will be conditional upon full implementation of the LCs endorsed and World Bank cleared RAPs which will be spelled out in the project/ loan covenants to ensure OP 4.12 requirements are fully complied with.

9 MONITORING, EVALUATION AND REPORTING

9.1 Overview

Successful implementation of a resettlement action plan depends on good resettlement management, close monitoring, and effective supervision. This enables the executing and/or implementing agency to make timely adjustments in implementation arrangements and take appropriate corrective measures during project implementation. It is therefore important that the adequate resources (finances and qualified human resources) are made available and monitoring of RP is integrated into the project's planning and management processes.

The major objectives of monitoring and evaluation are to:(i) ascertain whether activities are progressing as per schedule and the specified timelines are being met; (ii) assess if compensation, rehabilitation measures are sufficient; (iii) identify problems or potential issues; (iv) identify methods and corrective actions to rapidly mitigate any problems and (v) ensure that RAP objectives are met with and the standards of living of PAPs are restored or improved; (vi) collect gender disaggregated information to monitor the day-to-day resettlement activities of the project through the following (a) Review of project information for all PAPs; (b) Consultation and informal interviews with PAPs; (c) Key informant interviews; and, (d) Community public meetings.

Monitoring will involve (i) compliance monitoring to ensure that implementation is on schedule and problems are dealt with on a timely basis; (ii) The social impacts monitoring of the project and whether PAPs are able to restore and preferably improve their pre-project living standards, incomes, and productive capacity utilizing baseline information established through the socio-economic survey undertaken during project preparation; and (iii) overall monitoring to assess status of PAPs.

The LAR tasks will be monitored internally and externally. Regular monitoring of RAP implementation activities will be carried out internally by PIU through SSMC. The PMU will provide World Bank with an effective basis for assessing resettlement progress and identifying potential difficulties and problems related to scope, the subproject's risks and impacts.

9.2 Internal Monitoring

RAP implementation and safeguards management activities for each subproject will be subject to internal monitoring and evaluation. Internal monitoring will include day to day tracking progress about LAR planning and implementation activities including compensation payment progress, consultation and community feedback campaigns launched, resettlement, rehabilitation and income restoration measures implemented, community concerns and grievances recorded and resolved and corrective actions implemented etc. Close monitoring of RAP implementation progress will assist to identify and resolve the impediments and ensure timely delivery of compensation and resolution of matter of concerns for PAPs and other stakeholders. The scope of monitoring will includes: (i) compliance with the agreed policies and procedures for land acquisition; (ii) prompt approval, allocation and disbursement of compensation payments to PAPs, including if necessary, supplemental compensation for additional and/or unforeseen losses; and, (iii) remedial actions, as required.

The PIU will be responsible for internal monitoring and share RAP implementation progress and periodic monitoring reports with the IA and the World Bank. The census of PAPs and inventory of losses will constitute a base line for monitoring of RAPs progress and at PIU level, the LAR unit will manage and maintain updated LAR databases including quantified data on impacted assets with type, census details of the PAPs and compensation entitlements with payment

progress against the entitlements and payable costs to each PAP, etc., Potential monitoring indicators from which specific indicators can be developed and refined according to the census and IOL for each subproject are set out in **Table 5** below.

Table 5: Potential indicators for internal monitoring

Monitoring Aspects	Potential Indicators
Institutional set-up and resource allocation.	• RAP implementation and monitoring institutional set-up in place. • Budgeted RAP costs released and placed at disposal LAR implementation entities. • Grievance redress mechanism established and explained to the PAPs and affected communities. • Coordination initiative implemented and displaced persons committees notified for continued consultations and participation of PAPs in RAP implementation and monitoring.
Delivery of Entitlements	• Compensation entitlements disbursed, compared with number and category of losses set out in the entitlement matrix. • Relocation and rehabilitation costs and income restoration support provided as per entitlements and schedule • Social infrastructure and services restored as and where required. • Entitlements against lost business including transitional support to re-establish enterprises delivered. • Income and livelihood restoration activities being implemented as set out in the income restoration plan.
Restoration of living standard and income	• Affected residential structures reconstructed/restored at relocation sites outside ROW limits. • Impacted business structures (shops/stalls) constructed/relocated outside construction limits and business/income activity restored. • Number and percentage of displaced persons covered under livelihood restoration and rehabilitation programs (women, men, and vulnerable groups). • Extent of participation in rehabilitation programs with degree of satisfaction about support received for income restoration. • Number of displaced persons who have restored their income and livelihood patterns (women, men, and vulnerable groups). • No. of PAPs (especially vulnerable) provided opportunities in project related employment. • Percentage of displaced persons who improved their income and living standard (women, men, and vulnerable groups).
Consultation and Grievances	• Consultations organized as scheduled including meetings, groups, and community activities. • RAP disclosure and information dissemination activities implemented and knowledge of entitlements by the displaced persons. • Community awareness about grievance redresses mechanism and its use. • Progress on grievances recorded and resolved including information dissemination to affected families on the resolution of the grievances. • Information on the implementation of the social preparation phase and implementation of special measures for vulnerable groups.

Monitoring Aspects	Potential Indicators
Communications and Participation	• Number of meetings held with PAPs (male and female) to explain RAP provisions, grievance redress mechanism and compensation disbursement mechanism. • Assessment about Level of information communicated—adequate or inadequate. • Number of PAPs (male female) participated in the meetings. • Number of meetings and consultations held with vulnerable people with number of participants and level of information communicated.
Benefit Monitoring	• Compared to pre-project situation: • Changes noticed in patterns of occupation and resource use. • Changes observed in cost of living, income and expenditure patterns. • Changes access level and frequency with respect to social and cultural parameters. • Changes observed for vulnerable groups.

9.2.1 Monitoring of AED during project implementation

LGD should take the lead in and, in collaboration with KMC, DMCs and other agencies, monitor, map, and regularly update the locations of the AED conducted on or after the cut-off date. The Commissioner Karachi was asked by the Supreme Court to coordinate different agencies (SBCA and KDA) on their ongoing ant-encroachment plans and activities, and LGD can coordinate with the Commissioner and other agencies, as required, to ensure comprehensive mapping of the locations of the AED, completed and planned, in the city. The monitoring of the government's AED should include not only locations, but a categorization according to the typology and hierarchy described above as to assess the nature and extent of impact. The mapping should be done on a GIS platform building upon existing sources and the mapping exercise. CSO/research institutes are also monitoring and updating the areas affected by the AED and LGD can consider partnering with these institutes to ensure further validation of the information and enhance transparency. The monitoring of AED under this project will be conducted for the duration of project implementation only.

KMC is currently making efforts to relocate some of the vendors and hawkers to different locations. Monitoring of AED should also document the compensation or relocation of affected people in the future, and the response of people who have been offered such compensation or relocation (e.g. compensation accepted/rejected, satisfied/dissatisfied with the process, type of compensation offered etc. and the reasons for the response).

9.2.2 Monitoring of sub-project implementation.

To ensure that the sub-projects areas comply with the Bank's safeguards policy on involuntary resettlement, the screening of investment selection needs to be documented properly and will be presented to LGD for review and approval. The same will also be reviewed and approved by the Bank team for no-objection before LGD can commence their work.

For on the ground monitoring, and to manage operational and implementation issues related to the AED, LGD will contract and partner with CSO/NGOs on the monitoring and evaluation of the sub-project selection process, as well as implementation and progress of sub-project works.

In addition, each subproject investment will reviewed by the Bank for no objection to ensure that eligibility and screening criteria are met before RAPs/ARAPs are prepared

9.3 External Monitoring

The extent of monitoring activities, including their scope and periodicity, will be commensurate with the project's risks and impacts. LCs through PIU will engage the services of an independent agency or consultant, not associated with project implementation, to undertake external monitoring and evaluation of the RAP implementation.

An Independent Monitoring Agency or an individual with a team (IMA) will carry out external monitoring of RAP and report monitoring results to IA and World Bank through semi-annual monitoring reports or with a frequency as agreed with WB. The external monitor will monitor and verify RAP implementation progress and assess the achievement of RAP objectives and compliance with World Bank's safeguards requirement's through review of RAP implementation progress reports, periodic internal monitoring reports and through, consultations with the PAPs and other stakeholders and impact assessment based on filed surveys. The key tasks of the external monitor will include:

i. Review and verify internal monitoring reports prepared by PIU/SSMC;
ii. Validate the RAP implementation progress reported in internal monitoring reports (IMRs) and assess the achieved level of RAP implementation progress, issues impeding RAP implementation and actions required to improve the safeguards management;
iii. Review and assessment of compensation, relocation, rehabilitation and income restoration measures provided in the RAPs and establish bench mark indicators for assessment and evaluation of level to which the RAP objectives are accomplished.
iv. Review baseline information on socio-economic assessment, census and inventory of losses of pre-displaced persons and establish bench mark indicators for impact assessment through formal and informal surveys with the affected persons;
v. Consult PAPs, officials, community leaders and assess level of information dissemination activities implemented, awareness and access level of PAPs and communities to project based grievance redress and complaints handling systems;
vi. Assess resettlement efficiency, effectiveness, impact and sustainability, drawing lessons for future resettlement policy formulation and planning;
vii. Suggest actions for addressing the issues if any and corrective measures to be implemented by the PIU to ensure the safeguards management is fully consistent with RPF provisions and World Bank safeguards requirements as outlined in the OP 4.12.

Table 6 below presents a set of suggested indicators for verification of the monitoring information of the KMC by qualified and experienced external monitor.

Table 6: Potential Indicators for External Monitor

Monitoring Indicator	Basis for Indicator
Basic information on displaced persons' households (Gender disaggregated data essential for all aspects)	• Project location including description on project intervention and IR impacts. • Composition and structure, ages, educational, and skill levels with gender of household Head • Vulnerable households • Land and other resource-owning and resource-using patterns • Occupations and employment patterns and income sources and levels • Participation in neighborhood or community groups and access to cultural sites and events.
Compensation payment and Restoration of living standards	• Have the compensation for acquired assets including land, structures and other assets delivered? • Was sufficient replacement land available and compensation payments sufficient to replace lost assets? • Were house compensation payments made free of depreciation, fees, or transfer costs to the displaced persons? • Have perceptions of community been restored? • Have displaced persons achieved replacement of affected assets particularly residential, commercial and productive assets and key social and cultural elements?
Restoration of livelihoods (Disaggregate data for displaced persons moving to group resettlement sites, self-relocating displaced persons, displaced persons with enterprises affected.)	• Was the compensation for affected enterprise sufficient for re-establishing enterprises and production? • Have affected enterprises received sufficient assistance to reestablish themselves? • Have vulnerable groups been provided income-earning opportunities? • Are these opportunities effective and sustainable? • Do jobs provided restore pre-project income levels and living standards?
Information and satisfaction levels of displaced persons'.	• How much do the displaced persons know about resettlement procedures and entitlements? • Do the displaced persons know their entitlements and aware on whether these have been met? • What is the perception of displaced persons about the extent and level to which their living standards and livelihoods have been restored? • How much do the displaced persons know about grievance procedures and conflict resolution procedures?

Monitoring Indicator	Basis for Indicator
Effectiveness of resettlement planning	• Were the displaced persons and their assets correctly enumerated? • Was the time frame and budget sufficient to meet objectives, were there institutional constraints? • Were entitlements based on replacement costs and adequate for rehabilitation and restoration of the PAPs? • Were vulnerable groups identified and assisted adequately? • How did resettlement implementers deal with unforeseen problems?

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. The CAP implementation progress will also be reviewed and monitored by the IMA and will be made part of the subsequent monitoring reports. Internal and external monitoring and reporting will continue until all LAR activities have been completed.

In addition to the above defined monitoring mechanism, the World Bank will also keep a close oversight on the subproject implemented under the facility and will keep monitoring subproject on an ongoing basis by launching safeguards review missions until a subproject completion report is issued.

9.4 Reporting Requirements and Disclosure of Monitoring Reports

The IAs will prepare and submit quarterly (if not agreed otherwise in the RAPs) social safeguards monitoring reports to World Bank as part of project implementation performance monitoring. Such periodic monitoring reports documenting progress on resettlement implementation and resettlement plan completion reports will be provided through PIU through SSU to World Bank for review and disclosure. In case of subproject with significant IR impacts, the monitoring reports will be prepared by an independent monitor who will prepare and submit bi-annual monitoring reports to IA and World Bank's review and disclosures. IA will also submit subproject completion reports to World Bank for each site when compensation has been paid. In addition to the routine monitoring reports, in cases where ever required and agreed between IA and World Bank during execution of the project the PIU will prepare supplementary monitoring reports and share these with World Bank. All monitoring reports will be subject to disclosure and will be disclosed on World Bank and IA websites as and when cleared by World Bank.

Appendix 2: Stakeholders Analysis and Mapping in Karachi

Stakeholders	Role	Interests	Relationships
Political Parties	• The politics of Karachi takes place at the municipal, provincial and federal levels • Power struggle among federal, provincial and municipal governments belonging to three different parties has as adverse impact on the development of Karachi. • Failure of the major political parties to agree to a solution to initiate Karachi Transformation strategy. The unfortunate status quo will seemingly continue for the metropolis, adding to its citizens' miseries.	• The political parties are struggling for the development of Karachi in their own right to meet its infrastructure and service-delivery needs in urban transport, water supply and sanitation and municipal solid waste sectors. • Satisfying constituents, appears genuinely concerned for development of Karachi, keen to provide modern infrastructure and social sector development.	• Following the 18th Amendment, many sectors and departments were devolved to provincial government. • Weak relationship among the three parties and clashes of interest reduced their willingness to pay any attention to the development of Karachi.
Federal Agencies	• A host of several federal agencies such as Karachi Port Trust, Port Qasim, Pakistan Railways, Civil Aviation Authority, and Ministry of Defense all have their own jurisdiction over land in Karachi. They are governed often by separate laws and regulations.	• These agencies have control for over 65% of land in Karachi. They are responsible for land use and development issues under their jurisdiction. • Concerned about growing demands for all agencies to come under single administrative authority.	• Currently limited relationship with municipal and provincial government, however solid waste and water are covered in these areas by provincial and municipal government. Need for better coordination and cooperation with city on local affairs.
Provincial Government	• Responsible to address Karachi social service delivery issues • The provincial government has the authority over fiscal transfers, appointment, transfer and postings of human resources within districts and Towns. • Views itself to have a wider role to for the development of Karachi and province. • Should provide policy steer though this remains weak.	• Unhappy about lack of direct financial support from federal government for the Karachi Transformation Plan. • Keen to maintain control over federal funding for the execution of Karachi Transformation Strategy • Considering introducing amendments in the SLGO 2013 to get hold on municipal affairs and removal of Mayor and Deputy Mayor through a simple majority. Commissioner is official provincial representative at divisional level.	• Weary to delegate more powers to local bodies. Contrary, seen as a 'usurper of authority of the LG institutions'. • Major taxes are kept by the provincial government, whereas allegedly LGs authority to collect taxes were diluted and curtailed the functions of the municipal corporations. • Formal and informal relationship and direct control of many departments should be in the ambit of provincial government.
Municipal Corporations &	• Apart from KMC, the Metropolis's local government as the City's six district	• Keen to bring other agencies under municipal government umbrella, has respect of electorate and ordinary people.	• Appreciates need to build bridges with external agencies namely cantonment boards and other federal players.

Stakeholders	Role	Interests	Relationships
Elected Local Bodies	municipal corporations are equally represented by two political parties. • Civic services in Karachi are already badly compromised due to the power struggle between these two parties. • The allocation of funds and separation of garbage disposal, water supply and drainage functions from the LG bodies remain at the core of the contention. • Produced Karachi Master Plan by during the era of devolved City District Government and keen to see this implemented. Development priorities include infrastructure investment i.e. roads, bridges, flyovers and elevated expressways. • Looking for FDI and public-private partnerships.	City development authorities have also not been placed under the elected local bodies. • Many key functions have been reassigned to the province in the 2013 LG system, including police and building control. • Calling for an amendment in the Sindh Local Government Act, 2013, for devolution of powers from the provincial government to the LG bodies. • Delivery of key public services, i.e., SWM, community development, education, health and works and services.	• Needs to develop better capability to manage external stakeholder relationships, expectations and outcomes. DMCs and others bring forth their issues for better result and to work with co-ordination and co-operation for the city development in the meeting of the committee • According to the Sindh Local Government Act 2013 the provincial local government commission distributes some functions and responsibilities to the municipal government not happy with limited powers. Keen to have more powers and authority and desires to keep good relationships with Federal government.
Cantonment Boards	• Six cantonment boards in Karachi with Clifton being the largest and Karachi Cantonment Board the smallest. Manage SWM, environmental development and land use in their jurisdictions. Self-sufficient and managed directly by Core Commander and Ministry of Defense. Cantonment boards headed by a Grade 18-19 Executive Officer appointed directly by MOD. • Originally to protect interests of military personnel living in these areas but now commercial interests drive these areas. Cost of housing and quality of life in these areas considerably higher than anywhere else in Karachi.	• Limited coordination with provincial and local government institutions. • They collect sizeable revenue and for example KCB expenditure is below income. Staff salaries paid from own resources. Cantonment boards retain revenue and local taxes. • Through Ministry of Defense and Core Commander Cantonment Boards regulate their own areas. Governed by different set of rules and regulations and have their own separate LG structures, which create multiple and confusing jurisdictions.	• Rely on provincial government for water and sewerage and transport facilities. Happy to work with city government but keen to retain independence. Recent cooperation with city government has led to unifying of building laws in line with city government building regulations. They have also agreed common routes for transport. However differences remain with water utility over sewerage construction work. • Happy to continue operating as they have. Resisting pressure to become part of city government.
Local Councilors	• Elected and represent union committee constituents. Key link between constituents and city legislature and executive.	• Keen to foster development at local level, crying out for more resources and capacity to implement projects and sought help to execute authority in their constituencies.	• Have close relationship with municipal governments at Town and District level.

Stakeholders	Role	Interests	Relationships
Civil society groups	• Largely policy and advocacy with limited interaction with government except in areas where strong CBO culture exists. • CSOs such as SHERI, OPP and HANDS strong presence in Karachi involved in development activism and service delivery. URC strongest public interest agency and lobbyist against private goods projects.	• Disaffected with government and its problems, limited extent of cooperation. Civil society not really a monolithic movement in Karachi, though powerful enough to challenge external donor driven interventions. • CBOs have been responsible for community mobilization and their participation in planning and implementation of these schemes	• Large heterogeneous group, not well networked no formal group. This will be a loose conglomeration of water interests in Karachi. • Keen to function as support organizations for facilitating the critical interface between community and the government in the context of social service delivery projects.
Solid waste interests	• Many players involved in this multi-billion rupee industry, garbage pickers, middle men, recyclers, government officials, sweepers etc. both formal and informal links very strong.	• Key interests financial and economic. Industry supports over more than half a million households across city. Segregated solid waste funnelled through to recycle industries. Limited amount of solid waste actually deposited at land fill sites.	• Both formal and informal between government and non-government actors. Economic interests tie these bonds. Corruption a key driver of industry.

Appendix 3: Focus Group Discussions with Communities

Date	District	Location	Gender	No. of Participants	Key Observations/Concerns
21/10/2018	West	Yousaf Goth, Bengali Para, UC 38	Male	12	• Water is only available once in 15 days for a few hours. • Water quality is very poor, mixed with sewage. It take half an hour for particles to settle down for the changing of color to become normal. • Sometimes due to power failure not possible to collect water • No system of drainage of wastewater • Sewage water was found in all over the street. • Poor service attitude or maintenance delay • No municipal services such as garbage collection and street lights etc. • Most of the families work as daily wage workers for their livelihoods. • The drainage system should accommodate heavy rains. • Water supply, sanitation and solid waste systems should be developed.
21/10/2018	West	Yousaf Goth, Bengali Para, UC 38	Female	15	• Limited and erratic water supply to meet demand in most households. • Poor quality of the water mixed with sewage. • Safe drinking water should be supplied to every household. • Children suffer from health problems due to poor quality of water. • A significant share of family income is spent on buying water. • We are poor, we can't afford to spend hard earned wages on water only. • No system of drainage of wastewater • Sometime they boil water mostly when someone become sick. • Women mostly work as helpers in houses.
21/10/2018	West	Shadab Mohalla, UC 38	Female	13	• We are poor people, we have no voice, and no one listen to us. • We drink sewage mix water. • Children suffer because of low quality of water supply and complaints related to water-borne diseases. • In most cases we buy a tanker and share water among two to three families.
21/10/2018	Korangi	C-Area, Lal Masjid, Token Stop, UC-6	Male	15	• Sold waste dumped at the side of drainage. • Erratic water supply only in a few streets not in all. • Poor quality of water • Water bills were not paid due to non-availability services. • Water is collected from a private bore. • Inadequate water draining system, causing environmental and public health problems. • We witnessed many chief ministers were power, no one has done anything for us.

Date	District	Location	Gender	No. of Participants	Key Observations/Concerns
25/10/2018	West	Gulshan-e-Behar, UC 16, Orangi	Male	5	• Area is totally neglected from the official. • Water tanker is the main source to be bought an shared by families • Need piped water supply. • Sewer lines in the streets were constructed on self-help basis with technical support from OPP. • Solid waste is dumped in nearby empty plots. • No waste bin available on the road side. Household solid waste are dumped along the road side. • Our complaints are always unheard.
25/10/2018	West	Gulshan-e-Zia –Alaqs, UC 16, Orangi	Female	6	• Happy that new initiatives are being taken for water supply. • Water was purchased from tankers. • Receive water bills regularly without any water supply. • Each household spend about Rs. 3,000 to Rs. 4,000 per month • A few women work in the garment factories. • If regular water will be available we can save costs as well as water can be used for taking bath and cleanliness purposes.
25/10/2018	West	Mastan Baba, Gulshan-e-Bahar UC 16	Male	13	• For many months, no water. • Only one pumping station in this area. Due to slope, unable to pump water • We need another pumping station. In this area, 6 to 7 water pumps are required. • The main line was illegally punctured in collusion with valve men. • Using brackish water tastes very bad. • Only once in three months water supply was restored only during Eid-ul-Zuha after protest from the residents. • Corruption is rampant, valve man is mainly responsible for this ordeal. • Water bills are regularly sent. For120 sq. meter single storey Rs. 195 and Rs. 236 for double storey. • Tertiary sewer lines were constructed with support from OPP. • Political representatives never showed after election neither any visit from govt. official. • We are living in sub-human conditions.
25/10/2018	West	Mujahid Colony, Gahazi Abad UC 16	Female	7	• Since one year no water at all. • We pay the water bill but without any water. supply • There should be no bill, if they are they unable to supply water. • Too much bluffing from the official always threating us to disconnect the supply lines if we don't pay our bill. • No one has visited us except you people have come and are talking to us.

Date	District	Location	Gender	No. of Participants	Key Observations/Concerns
					• We pray to God to take notice on our plight. • We are poor can't go elsewhere the city is not liveable due to lack of social services.
11/11/2018	South	Lyari (Bihar Colony) UC 9	Male/ Female	8	• Running water is coming daily only for 1 hour in the evening. Sometimes no electricity means no water. • Sometime water smells badly. • Households boil water very often. • Usually men are responsible to collect water from outside. In their absence women and children take this responsibility. • They are not measured their water usage. • They are not paying money to purchase water from outside. • There are so many problems due to contaminated water like skin rashes, skin diseases, diarrhoea and abdominal issues. • Toilets were connected with sewerage system. • No proper maintenance of sewerage system all pipe lines are choked. • No maintenance and cleaning of drainage filled with solid waste. • There are no any sort of waste bins for their waste. • Government is not doing their work properly in this area. • They are hired private sweepers and pay them for collecting their waste and throw it away. • They charged Rs. 200 per household.
11/11/2018	South	Kharadar (Moosa Lane) UC 5	Male/ Female	9	• Piped water is the primary source of water. • Piped water is coming daily only for 1 hour in morning but occasionally for 20 to 25 minutes is the duration of supply. • Quality of water is not satisfactory. • Sometime water smells badly. • Household boils water very often. • Sometimes due to acute shortage they pay Rs. 200 for purchasing water from outside. • Housewives are responsible for cleaning inside their toilets and sometimes outside as well. • They are comfortable for the system of sewerage and drainage except cleaning of the clogged sewers done by themselves. • No waste bins, waste is dumped outside. • According to the local counsellor of this area, all work has done by herself without any support of government. • They are hired private sweepers and pay them for collecting their waste and throw it away. • They charged 200 Rs monthly per household.

Date	District	Location	Gender	No. of Participants	Key Observations/Concerns
11/11/2018	South	Garden (Dhobi Ghat) UC 18	Male	8	• Borehole and Hand pump (Burma) are the primary source of water. • Piped water is often come once in a week. • Quality of pipe water is very bad. People keep waiting until the sediments take time to settle satisfactory. • Household boils water very often. • 1 to 2 gallon is the usage of drinking water daily per house. • Households are paying Rs. 50 daily to purchase water from outside. • Suffered due to water borne diseases. • No proper maintenance of sewerage system. Pipe lines are broken. • Housewives are responsible for cleaning outside of their lanes. • They are not comfortable for the system of sewerage and drainage. • No waste bin for dumping garbage. • Officials never showed up, no one pay any heed to their issues. • Nearby waste dump (*katchra kundi*) smell badly. • Many complaints are made but no avail due to no response. It is hard to breath. • The entire locality were facing water, sewerage or drainage issues.
12/11/2018	East	Shanti Nagar, Sindhi Para, UC 23	Male/ Female	10	• Water tanker is the primary source of water • No water pipe lines are available in this area. • Availability of clean water is the dire need. • Water taste is not good. • Sometimes in case of non-availability of tanker water is fetched both by men and women from a borehole away from houses. • They are required 4 gallons daily for their water usage for drinking purposes. • They are paying money Rs 3000 after every 15 days to purchase water from outside. • Suffering from health issues such as diarrhoea and abdominal issues. • Sewerage lines were built in 1980 by a Welfare Society are not functional due to lack of maintenance. • Sewerage pipe lines are broken and all blocked. • There are no any sort of waste bins for their waste. • Waste pickers collect waste and charge Rs. 200 per month from each household. • No one from KMC or DMC have ever visited them to resolve their issues. • The need a pumping station and water supply and sewerage lines.
12/11/2018	East	Safoora Goth (Bilawal	Male/Female	16	• Water tanker is the primary source of water and sometime also use water from boreholes. • Water pipelines are damaged not working. • Water taste from borehole is not good.

Date	District	Location	Gender	No. of Participants	Key Observations/Concerns
		Jokhiyo Goth) UC 13			• Household boils water very often. • They require 1 tank after 15 days for their household consumption. • They are paying Rs 2500 to Rs 3000 for water tanker. • Suffering from water borne diseases like diarrhoea. • Primary sewerage lines are built by community on self-help basis and are connected with main sewer line. • Sweepers charge 300 to 400 Rs for unblocking the line in one visit. • No proper drainage of rainwater. • There are no any sort of waste bins to dump their waste. • Government is not doing their work properly in this area. • They are hired private waste pickers pay them for collecting their waste and throw it away. • They charged 200 Rs monthly per household. • Women mostly work in cantonment houses. • Households are willing to pay for water if regular supply is ensured.
13/11/2018	Central	People Chowrangi (Barohi Goth) UC 24	Male/Female	22	• Most of the households are involved in casual labour while few are self-employed. In most cases, both parents work. Women work as housemaid. • Water bore is the primary source of water. • Water pipe lines are available but have been damaged about for last 4 years. • Water supply is intermittent once in a week for 1 or 2 hours. Pressure is poor in some lanes not distributed equally. • Sometime water smells badly. • Usually householder ladies are responsible to collect water from Muhajjir Colony which is far from 20 mints. • They are required 8 to 10 gallons daily for their water usage. • They are not paying money to purchase water from outside. • Water contamination is an issue, health problems include skin rashes, diarrhoea and abdominal issues. • Number of disabled children was high. • There is no any maintenance of sewerage system all pipe lines are broken and choked. • They are not comfortable for the system of sewerage and drainage. • Need waste bins for their waste. • Solid waste throw away by themselves in the Nala, which is very near to their houses. • The drain passing through the neighbourhood is considered to be a major threat by the community as the drain swells during monsoons and at times the drain overflows into few households adjacent to the drain causing damages.

Date	District	Location	Gender	No. of Participants	Key Observations/Concerns
13/11/2018	Central	New Karachi (Khameso Jo Goth)	Male/Female	26	• Sewerage water is mixed with fresh water lines. • Borehole water is also available but quality is not good. • Situation of water supply is completely pathetic. • Usually householder ladies are responsible to collect water from outside. • They require 1 tank daily for water usage. • They are paying 1000 Rs for one small tank of water. • Many children become sick because of water borne disease. • There are number of disable children, old men and women. • Sewerage lines are damaged and blocked. • They are not comfortable and totally disappoint for the system of sewerage and drainage. • And there were no one for the maintenance of drainage issues. • Solid waste is thrown away in one plot which is close to residential area and burn all waste by themselves. • There complaints were never heard by authorities. • No one from LCs have visited them.
13/11/2018	Central	Liaqatabad, Ibn-e-Sina Market, No 4, UC 42	Male/Female	17	• Daily wage labour is the most dominant form of livelihoods ranging from auto drivers, construction labourers, petty shop owners, vendors and small businesses. • Piped water supply is the primary source. • Water pipelines are in good shape need rehabilitation. • No water supply in the first four streets. In other streets water supply is satisfactory. • Many complaints are lodged all in vain. • They boil drinking water. • They have complete sewerage system in their toilets. • There is no any maintenance of sewerage system major pipe lines are broken and damaged. • They are not comfortable for the system of sewerage and drainage. • There were no one for the maintenance of sewerage and drainage issues. • There are no any sort of waste bins for their waste. • Solid waste is dumped in the Gujjar Nala. • Government is not taking responsibility for maintenance of sewerage lines. • If they have hired private sweepers for cleaning their street so they charged 1000 to 1500 Rs per visit.
14/11/2018	East	Gulistan-e-Johar (Pahlwan	Male/Female	19	• Piped water supply available after every fourth day for four hours. • Water pipeline was laid by community on self-help basis. The total cost was Rs. 7 million, each household contributed Rs. 7,000. • Before piped water supply reliance was on tankers, each tanker costing Rs, 5000.

Date	District	Location	Gender	No. of Participants	Key Observations/Concerns
		Goth) UC 10			• No solid waste collection system. Garbage is dumped in nearby Nala. • This area is very much affected and polluted as garbage is scattered around. • The community members assist each and everything by themselves.
14/11/2018	Malir	Ibraheem Hyderi (Charan Para) UC 26	Male/Female	23	• Water tanker is the primary source of water. • Water pipe lines are available but all are damaged and blocked. • Water supplies only few houses of in area. • Lack of potable drinking water is the major issue. • Usually female members are responsible to collect water from outside when tankers are not at available. • Rs 3500 to Rs. 4000 is spent fortnightly to purchase water from outside. • Due to water contamination and unhygienic conditions skin rashes, skin eczema, diarrhoea and abdominal issues are common. • There is no maintenance of sewerage system all pipe lines are broken and all blocked. • They are not comfortable for the system of sewerage and drainage. • And there were no one for the maintenance of drainage issues. • There are no any sort of waste bins. Solid waste is dumped in a near plot and is burned. • KMC sweepers charged Rs. 1000 to clear the choked line.
14/11/2018	Malir	Hyder Shah, Awaz Youth Group, LSO, UC 27	Male	19	• Fishing is the predominant livelihood in the UC. Some fisherman also work as daily wage workers. • Main water supply lines are available but not linked with houses and no water supply. • Water theft is common. Main line water in bulk is consumed by factories. • Households do not have access to a piped water supply and have to purchase water from private water venders. • Water Board is unable to control • No writ of Water Board and UC chairmen. • Water Board should take control and provide water and we are ready to pay water bills. • Water is purchased from donkey cards Rs. 15 per 12 litre. The monthly expense of water is about Rs. 6,000. • There is no organized solid waste management and the majority of people throw garbage in open spaces.
14/11/2018	Malir	Rehri Goth (Pan Para) UC 31	Male/Female	21	• Most of the male members work in the factories and some are involved in fishing. Due to unemployment, workers are exploited and low paid. • Child labour is common. • Water is bought from tanker/ Suzuki van and donkey carts. • Water pipe lines are available laid 35 years ago but all are damaged and broken. • Water supplies only few houses of in area once or twice a weak.

Date	District	Location	Gender	No. of Participants	Key Observations/Concerns
					• Quality of water is not satisfactory in terms of colour and odour. • Usually householder ladies are responsible to collect water from outside when gents are not at home so ladies go outside to take water. • Monthly expenses are Rs. 4,000 to purchase water from outside. • There are so many health problems due to contaminated water such as eczema, diarrhoea and stomach issues. • Sewerage lines are broken and choked. • There is no maintenance of sewerage system all pipe lines are broken and all blocked. • No drainage system, sewerage and rain water at times spread all over in the street. • No waste bin any sort of waste bins for their waste. • Solid waste is thrown away. • No any type of municipal services are available in this area.
15/11/2018	Malir	Quaidabad (Qhuldabad) UC 06	Male/Female	18	• Water pipe lines are mixed with sewerage lines. • Water supplies twice a week duration 1 to 2 hours. • Situation of water is not satisfactory. • Water quality is very poor and smell badly. • Health issues such as eczema, diarrhoea and abdominal issues are common. • There is no maintenance of sewerage system; all pipe lines are broken and all blocked. • They are not comfortable for the system of sewerage and drainage. • There were no one for the maintenance of drainage issues. • There are no any sort of waste bins for their waste. • Solid waste throw away by themselves in empty spaces. • Line departments are not doing their work properly in this area.
15/11/2018	Korangi	Korangi no.4 (F Area) UC 09	Male/ Female	17	• Water supply is only available two hours once in a week; • Water pipe lines are mixed with sewerage lines. • Water is contaminated; colour and smell is bad. • Spend Rs. 50 per day to meet the household requirements for drinking water. • They are required 5 to 6 water cans daily for their usage. • There are so many health issues due to contaminated water. • They have no proper sewerage system in their streets. • They are not comfortable for the system of sewerage and drainage. • No cleaning of drainage system filled with solid waste. • There is no any sort of waste bins for their waste. • Privately hire sweepers for collecting their waste and paying them monthly Rs. 200. • No municipal services are available from the government side.

Date	District	Location	Gender	No. of Participants	Key Observations/Concerns
15/11/2018	Korangi	Zaman Town (Gulshan-e-Muhammadi) UC 23 & 24	Male/Female	15	• Most of the houses do not have access to clean and safe drinking water. • No access to drainage and sanitation facilities. • Water pipe lines are mixed with sewerage lines. • The old pipelines, which are a major cause of water leakages, should be repaired. • They pay about Rs. 50 for six small containers of water daily for their household use. • Both male and female household members are responsible for collecting water from outside. • There are so many problems occurred for smelly water like skin itching/rashes, hair problems, skin eczema, diarrhoea and abdominal issues. • Sewerage system is choked because of no maintenance. • They are not comfortable for the system of sewerage and drainage. • Inadequate sewage water service; many toilets are not connected to the municipal sewage network. • There is no any sort of waste bins for their waste. • Privately hire sweepers for collecting their waste and paying them monthly Rs. 200 • Government is not doing their work properly in this area. • If they hire private sweepers so they charged 100 Rs of per visit in each house.
16/11/2018	Korangi	Malir (C Area) UC 06	Female	21	• Water supply lines are mixed with sewerage lines polluted water. • Supply lines are broken need maintenance. • Sometimes water supply comes twice in a month but dirty water, sewerage water mixed with fresh water. • They require tanker of fresh water. • Water tanker costs Rs 4000 which is not sufficient for the entire month. • Household boils water very often. • There are so many problems occurred for smelly water like skin rashes, skin eczema, diarrhoea and abdominal issues. • Inadequate sewage water service; not proper maintenance of sewerage system • Worried about drainage system particularly due to rainy seasons. • They maintain their community or area but themselves no one is there from KMC or DMC for cleanness of area. • Drainage system is almost under control to this area. • There are no any sort of waste bins for their waste. • They throw away their solid waste in the Nala which is very near to this area by themselves. • Government is not doing their work properly in this area. • Bore hole is the primary source of water. • Water pipe lines are mixed with sewerage lines.

Date	District	Location	Gender	No. of Participants	Key Observations/Concerns
					• There is no water supply at all. • Situation of water is not satisfactory. • Sometimes water is smell badly just because of mixed lines. • Usually householder ladies are responsible to collect water from outside when gents are not at home so ladies go outside to take water. • On average, they spend Rs. 50 per household on water for consumption. • They are required 5 to 6 gallons daily for their water usage. • There are so many problems occurred for smelly water like skin itching, hair problems, skin eczema, diarrhoea and abdominal issues. • Blockage in sewerage system because of no maintenance. • Waste bins are not available for their waste. • Waste is collected by sweepers on monthly payment of Rs. 200.

Appendix 4: Consultation with Institutional Stakeholders

Date & Venue	Organization	Persons Consulted	Main Issues/Concerns/Feedback/Suggestions
Academia & Thinks Tanks			
15/10/2018 Sir Syed University Campus	**Sir Syed University, Karachi** Department of Architecture and Town Planning	Mr. Fazal Noor, Architect/ Urban Planner Prof. Shahid Saleem, Ex. MD, KMC	• Federal govt. should come forward and take the responsibility for the operations and maintenance of drinking water supply infrastructure and to resolve the service delivery issues in Karachi. The absence of a central authority, it would be difficult to resolve Karachi issues. • Capacity Building programs should be designed to strengthen institutions which are lacking in capacity to deliver. • High performing service providers should be given special acknowledgement by instituting a system of performance grants and rewards for the institutions and the individuals. • To ensure regular and quality service, the provision of urban water supply should be on the basis of full cost recovery for operation and maintenance.
16/10/2018 NED, City Campus	**NED University of Engineering and Technology, City Campus, Karachi** Department of Architecture and Town Planning	Dr. Saeed Ud Ahmed Mr. Manzoor Raza, Facility member	• The drinking water system should be separated from the existing system sewer lines. The quality of water supplied through the domestic system will adhere to drinking water quality standards. • Water supply is a basic human right of every citizen and it is the responsibility of the state, there should be no charge for provide safe drinking water delivering to the consumer. • 24/7 hrs water supply is not realistic goal form investors to achieve. • Scarcity of the water is not an issue but the problem is with inequitable distribution of water among municipal wards, DHA and Cantonments. • Sewer water should not diverted in drainage system without treatment • No political interference in service delivery.

Date & Venue	Organization	Persons Consulted	Main Issues/Concerns/Feedback/Suggestions
Civil Society Organizations (CSOs)			
4/10/2018 OPP Office Orangi	**Orangi Pilot Project –Research & Training Institute (OPP-RTI)** OPP-RTI supported low income families to finance, manage and maintain sanitary latrines in their homes, underground sewerage lines. In OPP's model, the internal component for sanitation and sewage disposal stands for the construction and maintenance of sewage lines in primary and secondary lanes. OPP-RTI has extended to all of Orangi town, (where 106,726 houses, have invested Rs. 122.61 million in secondary, lane sewers and sanitary latrines.	Mr. Salim Aleem Uddin, Director	• Government should provide main sewers/box drains and treatment plants • OPP-TRI is willing to provide technical assistance to KMC in designing sewerage issues at the community level. • Increasing population and rapid urbanization has created challenges. Government alone through top down approach will not be able to meet huge urban unmet needs, civil society and community support will be required to meet such challenges and to mitigate adverse environmental and socioeconomic impacts. • Lack of cooperation among different govt. agencies due to lack of political will and fragmented management roles and responsibilities. • The responsibility for the operations and maintenance should be handed over to communities. These communities will be responsible for routine maintenance and operations. • Sewer lines including trunk and branch sewer lines must be designed considering the future population and waste generation rate. Otherwise the constructed sewer may not carry the waste load, leading to failure and financial loss.

Date & Venue	Organization	Persons Consulted	Main Issues/Concerns/Feedback/Suggestions
4/10/2018 3:45 URC, Office	**Urban Resource Centre (URC)** The URC was set up in response to the recognition that the planning process for Karachi did not serve the interests of low- and lower-middle-income groups and informal sector operators. The Urban Resource Centre has sought to change this through creating an information base about Karachi's development. This has created a network of professionals and activists from civil society and government agencies who understand planning issues from the perspective of these communities and other less powerful interest groups.	Mr. Younas Baloch, Director Mr. Zahid Faruk	• Water supply is a serious issue in Karachi, 60 percent of city water is compromised due to theft and leakages. • No fair and just distribution of water, most of the low- and middle-income localities are facing acute shortage of water. In most low-income settlements water is available once in 15 days for few hours. • Poor people are paying Rs. 4,000 of 2000 gallons to private tankers. • People are willing to pay if KMC is able to provide safe drinking water regularly. • The provincial government should provide monitoring and surveillance to ensure that drinking water quality conforms with required standards • KMC should install meters at block level if installation of meters is not possible at household level to monitor theft and leakages in the system. • KMC should have a supervisory body represented by members from govt. CSOs, local bodies, Sindh Bar and Press Club at provincial, district and UC levels. • There is lack of coordination among different govt. agencies. • Water is basic need, PPP govt. lost in Layari because of this issue. Govt. should take it seriously otherwise it will be a great cause for social unrest. • Sea water should be used though desalination plant and sewerage water should be treated before it pollute sea water. • Karachi is suffering because politics of PPP and MQM. They should work together for the betterment of the City. • Development fund should be released to local bodies councilors without any party affiliation or liking and disliking or

Date & Venue	Organization	Persons Consulted	Main Issues/Concerns/Feedback/Suggestions
14/10/2018	**HANDS Pakistan** HANDS in last thirteen years (2004 - 2017) directly managed 575 projects with the average of 60 per years. HANDS has directly benefitted during the same period 28.6 Million persons with Health, Education, Community Infrastructure, Livelihood, Water and Sanitation. HANDS' WASH Program is committed to provide good quality water and sanitation services to the target population. WASH program is a series of projects, based on the foundation of field tested best practices and proven capabilities. The innovative models by HANDS WASH are low cost, durable, socially acceptable and environment friend	Mr. Tanveer, CEO Mr. Ghulam Mustafa Zour, Chief WASH Services Mr. Nadeem Wagan, GM, Communication and Advocacy Mr. Maqbool Rahu, GM WASH Ms. Rubina Jaffery Ms. Farhat Perveen	• HANDS was involved in the preparations of Citizen Report Card for KMC in 2010 and 2017 draft. • There should be a regulatory body to track performance of KMC such as PIMERA and PEPRA. • Public-partnership is needed to provide quality water, sewerage and other municipal services. • CSOs should be given the role of monitoring and audit of KMC services otherwise the funding of WB will go in drain. • Women need to be consulted regarding their needs and problems they are facing in terms of drinking water supply and sewerage issues. • Govt. agencies and NGOs should work together. Lessons learnt by NGOs in WASH sector should be incorporated in the design of subprojects by KMC. • KMC should follow right based approaches in the service delivery in the WASH sector. • Community and KMC should have regular interaction • Govt. agencies lack capacity in involving communities, HANDS can provide training on community participation and awareness raising. • KMC should have close cooperation with communities. • The participation of women is critical to ensure effective use and sustainability of water supply systems. They should have voice and role as they are responsible in the household chorus. • Due to inequitable consumption of water at the household level, women suffer the most.

Date & Venue	Organization	Persons Consulted	Main Issues/Concerns/Feedback/Suggestions
15/10/2018	**Strengthening Participatory Organization (SPO)** SPO involved in strengthening and supporting community organizations and public interest institutions for the benefit of poor and disadvantaged sections of society for sustainable development through a participatory approach. Gender mainstreaming is one of the key thematic areas of SPO. SPO implemented a project for the enhancing opportunities for youth livelihood and employment in Garment Sector through social and community mobilization in Karachi. The project aimed to train and employ youth of Korangi, Lyari Town and UC Sultanabad.	Ms. Rahima Panhwar Regional Coordinator	• GBV services were improved through provincial-level advocacy and lobbying from SPO for provision of services at police stations and Dar-ul-Amans in a more effective, accessible and standardised manner. • SPO has been involved in developing and strengthening CBOs in Malir District. • In Karachi, a Resource Centre has been established for organizations and individuals for soliciting information about the incorporation process of NGOs. • SPO is implementing a project, "Engaging Legislators for universal access to WASH Rights". The purpose of the project is to initiate legislative and government actions to establish priority status for WASH rights in the country, especially for the most vulnerable and marginalized in such a way that they are capacitated to advocate and lobby for Water, Sanitation and Hygiene (WASH) as fundamental Human Rights as given in the Constitution of the Islamic Republic of Pakistan. • SPO's experiences can be utilized by KMC and SPO can provide capacity building services and awareness raising campaign for water conservation in the City. • KMC needs training on the right bases approached and community mobilization that gap can be filled SPO.
22/10/2018 SHERI Office	**Shehri-Citizens for a Better Environment** Shehri-Citizens for a Better Environment has been striving to empower the citizens for better engagement with their institutions providing basic civic services and also in strengthening the institutions of civic governance and making them socially accountable.	Mr. Farhan Anwar	• Karachi is facing with a number of challenges in service delivery that hinder sustainability in growth and good governance. • Civil society organizations and community activists should be involved in information dissemination and raising awareness about regular supply and quality issues. • Lack of maintenance of the water & Sewerage network/infrastructures, contamination, irregular or no supply to informal settlement, leakages • Limited capacity and financial position of KMC • Need for a regulatory authority and citizen activism to improve operational effectiveness of KMC. • Karachi growth and urbanization made difficult for KMC alone can cater the need in water and sanitation sector.

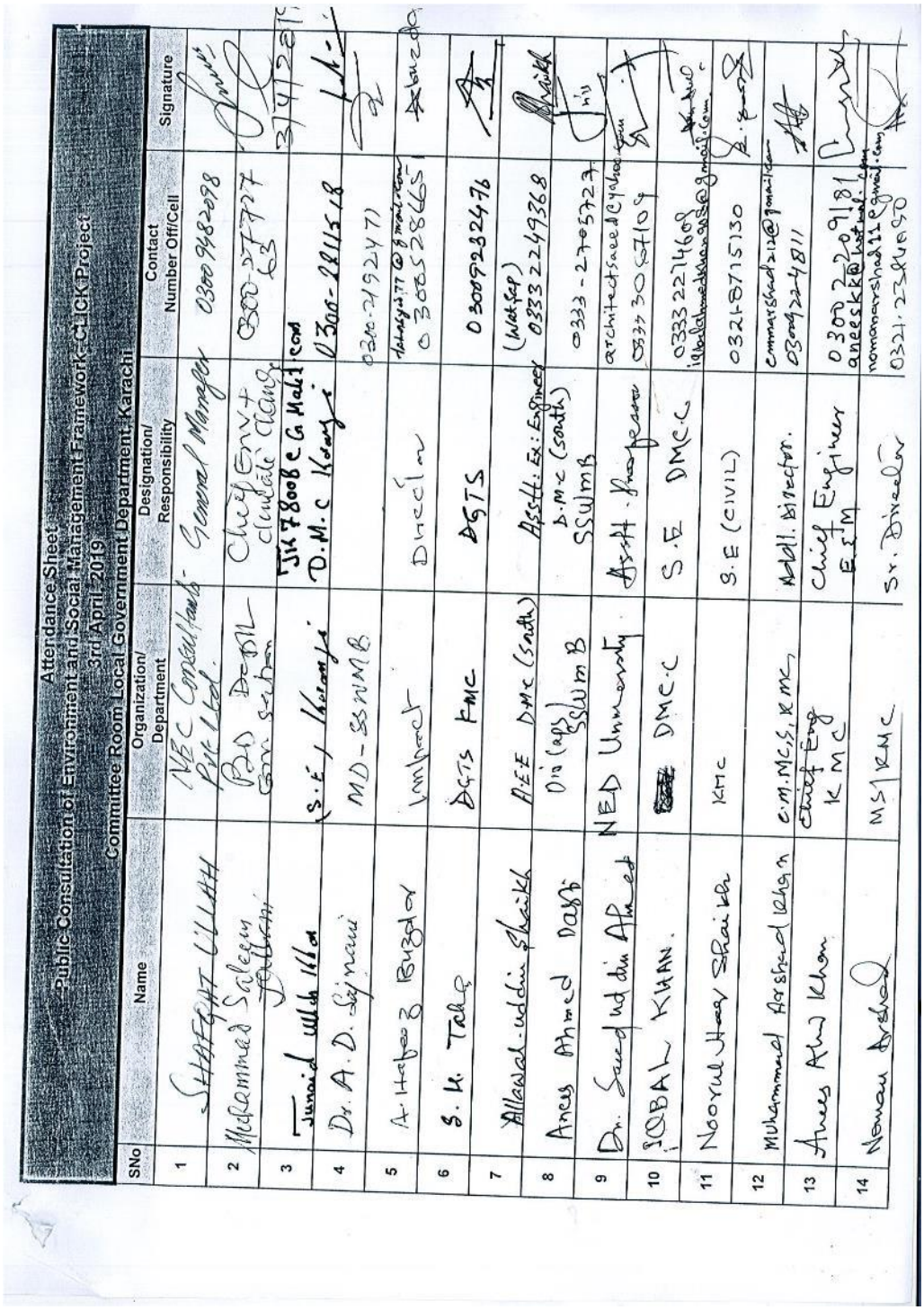
Date & Venue	Organization	Persons Consulted	Main Issues/Concerns/Feedback/Suggestions
24/10/2018	**Pakistan Institute of Labour Education & Research (PILER)**. PILER is a Non-Governmental Organisation (NGO) dedicated to promoting a democratic and effective labour movement for the overall advancement of a socially just and equitable society where the fundamental rights of people are protected. (PILER) was founded in 1982 by a group of concerned individuals from the trade union movement, academia and various other professions. In 1988, PILER established a formally designed research and training programme with regular workshops, courses and advocacy activities,	Mr. Karamat Ali, CEO Mr. Zulfiqar Shah, Joint Director	• Inclusive and broad based participation should be ensured in the implementation of the WB assisted projects. • Labour working conditions of KMC and KMC need lot of improvement. • Citizens oversight is essential, there is need to establish a Citizen Council to oversee the service delivery issues related with KMC, LCs. • The industry is deficient with qualified and experienced labor inspectors. Their role should be enhanced geared towards workers welfare rather policing in order to increase productivity. • Health and safety issues to minimize fatal injuries and accidents should be top priorities. Pakistan is in top five countries in terms of injuries and accidents. • PILER can assist in providing training on labor rights, health and safety in this field as per ILO and local regulations standards. • KMC labor department needs professional people. Trained personnel should provide training on occupational health and safety in LCs. Right of association or union activities should be encouraged.
24/10/2018	**Shirkat Gah, Karachi** Shirkat Gah is a women's rights organisation and providing support to women who have been subjected to forced marriages and has organised and campaigned around cases of 'honour killings' of women. It has also documented customary practices, including 'honour crimes', which result in violence against women throughout Pakistan.		• Women should be especially consulted when determining the operations and management arrangements issues related with social sector infrastructure. • Special efforts should be made to recruit and induct women in KMC and KMC and other relevant agencies to ensure that the needs of women clients are addressed. • Women being vulnerable are left behind in benefit sharing of water supply and sanitations services. Project must ensure a level playing field for both men and women. • Women are more vulnerable and their needs are different than men that should be kept mind during project planning and implementation.

Date & Venue	Organization	Persons Consulted	Main Issues/Concerns/Feedback/Suggestions
23/10/2018	**Aurat Foundation, Karachi** Aurat Foundation is committed to create widespread awareness and commitment for a just, democratic and caring society in Pakistan, where women and men are recognised as equals, with the right to lead their lives with self-respect and dignity. Aurat Foundation one of the leading institutions creating, facilitating and strengthening civil society groups and networks for promoting trust and collaboration among citizens to mobilize public pressure for women's empowerment in the country.	Mrs. Mahnaz Rahman, Resident Director, Karachi Ms. Shahida Ms. Munezay Ms. Malika	• Briefing on the CLICK and CLICK • KMC should promote metering of water consumption to discourage the indiscriminate use of water. • KMC lacks capacity, Aurat Foundation can kelp in conducting studies and providing training; • KMC should be gender sensitized to provide employment and other opportunities. • Illegal water connections and revenue loss from water tankers • A minimum distance will be ensured to separate water mains and sewerage lines to avoid contamination of drinking water supply. • Expansion of the water intake facilities or structures which are currently inadequate to meet the demands of the population • In project implementation the needs of underserved areas such as katchi abadis kept in mind due to their powerlessness. • Citizens should be involved. A process of strong lobbying and social accountability should hold make govt. responsible for basic social services to the communities.
	National Organizations for Working Communities (NOW) The National Organization for Working Communities consists of dedicated experts in development work in various fields of development concerning labor and women including peace, media, education, and community health. This collective have experience of working in countries most respected organizations. They have come together to fill the gap of much needed innovative approaches to organize workers, women and youth of marginalized working classes of Pakistan.	Ms. Farhat Parveen, CEO and Member of Commission on Women Status	• Capacity building programs for community organizations should be implemented in collaboration with NGOs for improving the local level capacity for operation and maintenance of schemes. • KMC responsible for the provision of water supply should ensure that the quality of water supply does not fall below the quality standards • Provision of water, sanitation and municipal services are insufficient, needs more resources from both provincial and federal governments. • NOW helped P&DD in developing gender sensitized budgeting and can help other govt. department including KMC. • NOW compiled a series of annual reports on Karachi Human Security Reports. • Helped P&DD of GoS for preparing a gender sensitive participatory budget.

Date & Venue	Organization	Persons Consulted	Main Issues/Concerns/Feedback/Suggestions
14/11/18	**Hisaar Foundation** Hissar Foundation (HF) is acting as a think tank on water and environmental issues. HF played a key role in the developing recommendations for Pakistan's national water policy framework through a series of consultative and consensus building sessions with stakeholders from serious of sectors in various cities of Pakistan. HF is planning to plan and organize 3rd International Water Conference.	Ms. Sanna Baxamossa, GM Mr. Zohair Ashir, Chairperson Board, Hisaar Foundation	• KMC's performance have been showing a steady decline in terms of both the level and quality of services • KMC lacks ability and capacity to manage water and sewerage services for the entire city, "KMC will not be fixed by KMC". • HF experience for establishing women user groups was successful for awareness regarding water conservation and on behavioral changes. • HF with support from communities developed a Water Filtration Plant in the Ibrahim Hydri Goth was a successful venture. Such facilities should be provided in the other parts. • HF will continue to play an integral role in strengthening the Area Water Partnership and women networks that were created under the Karachi Water Partnership.
Provincial Government, Sindh			
	Local Government Department The Government of Karachi is the administrative body for the city of Karachi, Pakistan. The current Karachi Local Government System follows the Sindh Local Government Act of 2013 (SLGA 2013).	Mr. Faheem Akhter Junijo DG (M&E)	• Local govt. is looking forward materializing the WB investment for the service delivery improvement in Karachi. • LCs should prepare investment plans to share with WB. • Not optimistic envisaging any changes in the Sindh Local Govt. Act 2013 to bring it at par with other provinces to devolve power to the local level. • Political confrontation between provincial and city govt. will have no bearing on the investment. • Extreme care will be taken in the project identification will take consider those section of Nala having many social impacts.
	Board of Revenue The Board of Revenue of Sindh, Pakistan is responsible in all matters connected with the administration of Revenue collection and preparation of land record and other matters relating thereto. The power vested to Deputy commissioners to acquire private land for the purpose of development projects under LAA, 1894.	Mr. Aftab Ahmed Memon, Secretary land Utilization, Govt. of Sindh	• Land acquisition is dealt by the respective DC of the district. DC/LAC will be responsible to acquire land for the project when needed. • Board of Revenue follow the Land Acquisition Act 1894 from acquisition to compensation. • Encroachment is a big issue in Karachi need to be taken care by concerned authorities. • Board of Revenue is ready to help for matters related to land acquisition.

Date & Venue	Organization	Persons Consulted	Main Issues/Concerns/Feedback/Suggestions
	Directorate of Labour, Karachi Labour Department is responsible to promote industrialization and industrial peace as well as observance of labour laws and rules. It is mandated to promote investment and employment in the province. It is also responsible for the welfare of working labour force and enhancement of its capacity through training and development.	Ms. Nagina Junijo, Joint Director Labour Eng. Syed Ali Ashraf Naqvi, Joint Director Labour, Occupational, Safety & Health Centre (Zone -1)	• Directorate can play a significant role in the training of workers and officials in occupational, health and safety standards. • Sindh Govt. has promulgated various laws for the welfare of workers those should be adhered strictly. • Directorate is striving to improve the living conditions of the labour including women in Karachi. • Factories workers are weak in compliance of health and safety standards. • Department need to have more labour inspectors to ensure compliance in labour related standards.

Appendix 5: List of Participants of Public Disclosure Consultation Meeting



Attendance Sheet

Public Consultation of Environment and Social Management Framework-CLICK Project

3rd April 2019

Committee Room, Local Government Department, Karachi

SNo	Name	Organization/ Department	Designation/ Responsibility	Contact Number Off/Cell	Signature
1	[illegible]	NEC Consultants Pvt Ltd.	General Manager	0300 9682098	
2	Muhammad Saleem [illegible]	PPP Dept. Govt Sindh	Chief Envt Consultant Cons	300-2277277	
3	Junaid Ullah Wasan	S.E./ Karangi	D.M.C Karangi	0300-2811518	
4	Dr. A. D. Sajnani	MD - SSWMB		0300-2192471	
5	A. Hafeez Rughani	Consultant	Director	0300 2285651	
6	S. K. Taha	DGTS	DGTS	0300 9232476	
7	Allawal-uddin Shaikh	A.E.E DMC (South)	Asstt. Ex. Engineer	0333 2249368 (Watsap)	
8	Anees Ahmed Dashti	D/A (adp) SSWMB	D.M.C (South) SSWMB	0333 - 2765727	
9	Dr. Saeed ud din Ahmed	NED University	Asstt. Professor	0333 3054109 architectsaeed@yahoo.com	
10	IQBAL KHAN.	DMC	S.E DMC	0333 2274608 iqbalchoudhary555@gmail.com	
11	Noorul Hasan Shaikh	KMC	S.E (CIVIL)	03218715130	
12	Muhammad Arshad Lohar	C.M.MCS, KMC	Addl. Director.	cmmarshad2:12@gmail.com 03009234811	
13	Anees Alam Khan	Chief Engg KMC	Chief Engineer E&M	0300 2209181 aneeskk@hotmail.com	
14	Nomaan Arshad	MS/KMC	Sr. Director	nomanarshad112@gmail.com 0321-2324990	

Attendance Sheet
Public Consultation of Environment and Social Management Framework- CLICK Project
3rd April, 2019
Committee Room Local Government Department, Karachi

SNo	Name	Organization/ Department	Designation/ Responsibility	Contact Number Off/Cell	Signature
15	Faheem Juneja	LGD	DIRECTOR (M&E)	0300-5118111 faheem.juneja1@gmail.com	
16	Tariq Hussain Mughal	DMC EAST	S.E	0333/3201154	
17	Rashid Niza.	DMC.	Dir (I/K) FSA	033 41222 916	
18	NASRULLAH MEMON	D.M.C Malir	S.E	Rashid_nizam786@yahoo.com. 0302-2908465	
19	LATIF KHAN	LGD	A.D-II, LGD	0304-2102390	
20	Imran Aslam	DM.C Corangi	M.C	554222280@gmail.com 0333-2252292	
21					
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Appendix 6: Social Safeguards Screening Form

A. Introduction

Subprojects are assigned an involuntary resettlement category depending on the *significance* of the probable involuntary resettlement impacts. Subprojects are categorized as A, B or C depending on the number of persons that will experience major impacts which is defined as (i) being physically displaced from housing, or (ii) losing 10% or more of productive assets or both. Subprojects where 200 or more persons will experience major impacts will be categorized as 'A' for IR and the sub projects with IR impacts of lessee's significance will be categorized as B and the subprojects without IR impacts will be categorized as C. For category A and B subprojects he RPs commensurate with the impact significance will be prepared, implemented and monitored in compliance with safeguards requirement of World Bank's OP 4.12.

B. Instructions

The screening checklist below will be used for screening of IR impacts of different subprojects to be implemented under the CLICK. The checklists will be completed by the PIU and SSMC supervisory consultants under the Project and will be shared with World Bank safeguards officer to seek guidance and advice for preparation of RAPs commensurate with the impact significance in a manner consistent with World Bank's safeguards requirements before processing of the RPF subsequent phase projects.

The social safeguard screening and categorization of a subproject is a continuing process. If there is a change in a subproject design and scope requiring IR impact change or unanticipated impacts identified during course of implementation that may result in category change, the PIU/SSMC will review the likely impacts following this screening check list and will report to World Bank for seeking guidance to update/revise the category and RAP accordingly or prepare an addendum RAP to ensure project implementation is consistent with the World Bank's safeguards requirements.

Screening Questions for Involuntary Resettlement/Indigenous People

Involuntary Resettlement Impact screening questionnaire.				
Probable IR Impacts	**Yes**	**No**	**Not Known**	**Remarks**
Involuntary Acquisition of Land and Resettlement Impacts				
1. Will there be land acquisition?				
2. Is the site for land acquisition and ownership status and current usage of land to be acquired known?				
3. Will easement be utilized within an existing Right of Way (ROW)?				
4. Will there be loss of shelter and residential land due to land acquisition or due to clearance of existing right of way?				
5. Will there be loss of agricultural and other productive assets due to land acquisition or due to clearance of existing right of way?				
6. Will there be losses of crops, trees, and fixed assets due to land acquisition or due to clearance of existing right of way?				
7. Will there be loss of businesses or enterprises due to land acquisition or due to clearance of existing right of way?				
8. Will there be loss of income sources and means of livelihoods due to land acquisition or due to clearance of existing right of way?				
9. Will people lose access to natural resources, communal facilities and services due to involuntary restriction of land use or on access to legally designated parks/protected areas?				
10. Will access to land and resources owned communally or by the state be restricted?				
Information on PAPs:				
Any estimate of the likely number of persons that will be affected by the Project? [ ] No [ ] Yes If yes, approximately how many? _____ _____				
Are any of them poor, female-heads of households, or vulnerable to poverty risks? [ ] No [ ] Yes				

Note: The project team may attach additional information on the project, as necessary.

Appendix 7: Terms of Reference for SIA, SMP and RAP/ARAP

1.0 Introduction

The proposed Project includes Technical Assistance (TA) component to support the IA in conducting relevant social impact assessments (SIAs), *inter alia*, aimed at preparation of site-specific social management plans (SMPs) including resettlement action plans (RAPs) for potential subprojects under CLICK.

Tasks under this TOR are envisaged to commence from subproject identification/feasibility study, include detailed SIA culminating into preparation of site-specific RAPs/ARAP based on findings of the SIA, and be undertaken in tandem with social studies/plan preparations and design works for the corresponding sub-project site.

Each document prepared shall be reviewed and cleared by the Bank and approved by concerned Executing Agency (EA). As some of the subprojects may involve inherent risks and impacts, site-specific social assessments and preparation of required management plans is required adhering to the World Bank safeguard policies and procedures and to those of GOP.

The EA intends to apply portion of the program funds for payments under the contract for Consulting Services for conducting site-specific social impact assessments, preparing the required site-specific social management plans including RAPs based on analysis of assessment findings, and securing required approvals wherever applicable.

The main objective of this consultancy is to conduct a Social Impact assessment (SIA) and develop a Social Management Plan (SMP) for the investment proposal entitled CLICK that will provide the decision makers with sufficient information to justify acceptance, modification or rejection of the proposed project for financing and implementation

2.0 Scope of Work

The scope of work shall clearly specify various activities to be performed by the social development consultant, surveys to be carried out, and other requirements of the study. The following sections list out various tasks to be performed by the social development consultants in conducting Social Impact Assessment for the project.

2.1 Description of Project

A full description of the proposed subproject shall be provided that will include an analysis of the existing water supply and sewerage situation in the project city and a description of each of the proposed components such as intake structures, treatment plant, transmission main, pumping station, storage reservoirs, distribution network, etc. The task shall also bring out the rational, the need for the proposed project and list out the various benefits of project implementation. As part of this activity, the consultant shall provide necessary maps to scale.

2.2 Review of Earlier Studies

The social development consultant will review various earlier studies such as feasibility and detailed project reports, etc., of the project and understand the project and various aspects associated with the same. A review of the studies carried out on the social aspects of the Project

area shall also be carried out. This shall provide a base to formulate the social surveys necessary for the project and assessing impacts of the same.

2.3 Legislative and Regulatory Review

A review of the legal and regulatory provisions applicable for the project will be carried out. The objective of the review is to bring out the legal and policy issues to be addressed in the project at various stages of project development such as planning, design, execution and operation. In addition to the national and provincial laws such as SEPA Act, Water Act, 1996 and Land Acquisition Act 1894, etc., the consultants shall review applicable operational policies / directives World Bank and ascertain how these legislative tools, policies, norms, standards, guidelines and initiatives relate and apply to the activities proposed/envisaged for the Project/Investment.

2.4 Preparation of Baseline Conditions

Socio-economic baseline of the project corridor will be prepared, based on appropriate primary & secondary surveys and field investigations. The objective of this exercise is to establish existing social conditions of the project area, which should form the basis for prediction of social impacts due to proposed subproject activities. The information gathered will be adequate enough to predict impacts of the project and shall cater to the requirements necessary clearances from the authorities. An overview of the existing social and cultural conditions should be provided in order to place the Project/Investment in context. The baseline information considered important for the setting baseline context should include:

- Towns/communities surrounding the area, and their population and socioeconomic characterization by age, gender, ethnicity, language, literacy/education, income and occupation;
- Sources of livelihood (level/availability of employment by gender/occupation and income patterns);
- Land tenure/titling;
- Migration and settlement patterns;
- Health and education levels (including disease patterns and endemic diseases);
- Archeological/cultural sites and monuments, including sacred sites such as caves, lakes, quarries, etc.
- Services and infrastructure (i.e., existing utility infrastructure including water supply, sewage, wastewater treatment works, power lines and transformer sub-stations; and existing capacity of and load on utilities infrastructure);
- Access to basic healthcare, education (i.e., existing clinics/hospitals, capacity of healthcare system; existing schools'/training centers, and daycare facilities);
- Social organizations and dynamics;
- Access to infrastructure/roads or network of existing transportation modes to/from the proposed development Project/Investment, activity, or action;
- Vulnerable populations (elderly, poor, women, disabled, transgender and young);
- Identification of any communities or households that will need to be resettled or compensated arising out of implementation of the investment.

2.5 Determination of Potential Impacts

Based on the baseline socio-economic profile of the Project area prepared above and the proposed subproject activities, the consultants will carry out social screening to determine the nature of impacts and level of social assessment to be carried out (Section 5.0 provide the details to be carried out). In case of low or insignificant level of impacts, where an SMP will suffice, the consultant shall review the recent versions of generic SMP available with SMF and carry out necessary changes to suit the subproject requirements.

As part of screening, if medium to high impacts, requiring a detailed SIA and standalone SMP is required, the consultant will carry out detailed impact analysis. The consultant shall predict environmental impacts of the project components, activities and sub-activities on various socio-economic attributes through using appropriate analytical tools and techniques. Significant or insignificant, permanent or temporary, negative or positive impacts will be categorized separately and presented for each phase of project development.

All identified impacts will be summarized in an easily understandable format and the magnitude and significance of each impact shall be explained in detail. An analysis of various project alternatives, including the 'Project' and 'No Project' scenario shall be brought out and impacts shall be analyzed for each scenario. Based on the above analysis the best alternative that causes minimum or no impact shall be recommended for implementation.

Identification and assessment of social impacts of the subproject/investment, including those impacts related to occupational safety and health in the stages of construction, operation and maintenance should be done. Consideration should be given to all potential direct and indirect negative impacts.

The SIA should:

- Address any national regulatory issues related to the environmental and social assessment as per country legislation and regulatory mechanisms.
- Identify, describe and assess all potential social, direct and indirect, short and long-term, temporary and permanent impacts, indicating their importance level and their probability of occurrence. The importance level may be assessed on the basis of the nature, extent, intensity and duration of the impact, as well as on the sensitivity of the concerned social components and perceptions of the public.
- Highlight all impacts including unavoidable impacts. Cumulative and scale effects shall also be addressed taking into account all planned activities or actions in the project area.
- Identify, describe and assess impacts on the socio-environmental impacts must be based on the characterization of the project corridor. This characterization outlines the general conditions of the area without the effects of the Project/Investment and constitutes the basis for analyzing how the Project/Investment will impact the area.

2.6 Stakeholder Consultations

The consultants will carry out consultations with Experts, NGOs, and other selected Government Agencies and other stakeholders to (a) collect baseline information, (b) obtain a better understanding of the potential impacts (c) appreciate the perspectives/concerns of the stakeholders, and (d) secure their active involvement during subsequent stages of the project as appropriate .

Consultations will be preceded by a systematic stakeholder analysis, which would (a) identify the individual or stakeholder groups relevant to the project and to social issues, (b) include expert opinion and inputs, (c) determine the nature and scope of consultation with each type of stakeholders, and (d) determine the tools to be used in contacting and consulting each type of stakeholders. A systematic consultation plan with attendant schedules will be prepared for subsequent stages of project preparation as well as implementation and operation, as required. Where community consensus is required in respect of proposed mitigation measures for impacts on community assets including water bodies, places of worships etc., specific plan for modification/relocation, etc., have to be disclosed and consensus obtained.

2.7 Social Screening

Social screening will be undertaken to identify the social impacts along the subproject corridor and determine the level of social analysis required for the SIA. The consultant consultants will carry a preliminary analysis to assess the nature, scale and magnitude of the social impacts that the project is likely to cause on people. In case of significant social impacts encountered (may be applicable to the entire project/specific subproject interventions specific. The consultants will explore possible alternatives to the subproject and or project components in a consultative manner. The deliverable at this stage will be social Screening Report.

The screening exercise will be supported through secondary and primary information collection and, stakeholder consultations on existing social scenario.

3. Social Management Plan (SMP)

The consultant shall prepare a detailed SMP covering the measures to mitigate and/or minimize the negative impacts, including the implementation arrangement and a monitoring plan for the same. Detailed description of all proposed social control and mitigation measures that are needed based on risks arising out of the Project/Investment as a whole, the type of activity undertaken or actions during construction (e.g., resettlement compensation plan, livelihood restoration plan, maintenance and site security plans, and emergency evacuation and contingency plans). SMP shall cover the following details:

- Identify mitigation measures to prevent, minimize, mitigate or compensate for adverse social impacts.
- Assessment of the nature and number of beneficiaries potentially a affected by the proposed project;
- Develop enhancement measures to improve subproject social performance.
- Present initiatives proposed to complement the enhancement and mitigation measures.
- Detailed description of a planned social monitoring program for both construction and operation and a discussion of how the information will support management practices.
- Description of planned worker health and safety plan, procedures and controls. A management plan covering the transport, handling, storage and disposal, with associate management and reporting practices including preventive and contingency measures, in consultations with potential workers and communities (if applies).
- Description of a proposed environmental, health and safety management system (including personnel, training, documentation, auditing, etc.).

- Where applicable Description of a plan to manage population influx into the subproject site or controlled land use area (e.g., contracting requirements to manage potential worker expectations).
- Description of a plan/mechanism to receive and facilitate resolution of affected community concerns and grievances about the Project/Investment, activity, or action and its negative impacts.
- Develop a mechanism for project-level grievance redress including the EA institutional level grievance redress mechanism. The mechanisms should provide a user friendly medium/process by which people affected by the project can bring their concerns to the attention of the IA.
- Description of a plan to protect, reduce, and manage the negative impacts on any sacred/archaeological and historic sites/monuments if applicable.
- Description of Project/Investment, activity, or action-specific supervision and evaluation actions to be implemented.
- Public awareness, communication and training programs for operational staff Indicators of compliance with approval requirements.
- For each component listed above, the proposed time schedule (i.e., when initiated, when completed, and frequency), responsibility (i.e., who will implement), and the estimated cost should be provided;
- Performance indicators in relation to critical operational issues
- Documentation of complaints received.

3.1 Deliverable and Reporting Requirements

- An Inception Report to be submitted within one (1) week of contract signing that includes a Work plan with timelines for completing the assignment
- A report detailing the outcome of the Social Screening Exercise to be produced within 1 month of the commencement of the assignment
- A Draft Social Impact Assessment (SIA) for the Proposed Project
- A Draft Social Management Plan (SMP) for the Proposed Project
- A Final SIA Report and SMP, incorporating suggestions and feedback from the project core team during the review of the draft, and including an executive summary that highlights the most important findings (maximum 2 pages). This document is one of the principal output (s) of the Assignment and will provide a basis for future decision making in respect of the project. It is required to be comprehensive and based on the scope of works and specific activities outlined and must conform to the following minimum requirements:
    - A document that can be used in non-technical discussions with potential partners, the wider society public and private sector officials, service providers and others to prove/provide evidence of the feasibility /viability of and obtain support for the development of the project.
    - It must/should contain a time -bound roadmap/blue print for pursuing recommendations emanating from the assignment
    - Data and information in the report must be presented in an analytical manner and address the issues highlighted above

- A draft copy of the Final report and plan must be prepared by the consultant and submitted to the EA and WB for approval and agreement prior to finalization.

3.2 Table of Content

The content of this study must include –at least- the following elements:

- Description of the project or activity
- Determination and justification of the area of influence (for each affected element)
- Baseline
- Consultation and Citizen Participation Process
- Impact prediction and assessment
- Description of potential effects/risks
- Plan for Mitigation, Reparation and Compensation Measures
- Plan for Contingency and Emergency Prevention
- Follow-up Plan

4.0 Resettlement Action Plan

This outline is part of the Safeguard Requirements. A RAP is required for all projects with involuntary resettlement impacts. Its level of detail and comprehensiveness is commensurate with the significance of potential involuntary resettlement impacts and risks. The substantive aspects of the outline will guide the preparation of the RAP.

4.1 Executive Summary

This section provides a concise statement of project scope, key survey findings, Entitlements and recommended actions.

4.2 Project Description

This section provides a general description of the project, discusses project components that result in land acquisition, involuntary resettlement, or both and identify the project area. It also describes the alternatives considered to avoid or minimize resettlement. Include a table with quantified data and provide a rationale for the final decision.

4.3 Scope of Land Acquisition and Resettlement

This section:

- Discusses the project's potential impacts, and includes maps of the areas or zone of impact of project components or activities;
- Describes the scope of land acquisition (provide maps) and explains why it is necessary for the main investment project;
- Summarizes the key effects in terms of assets acquired and displaced persons; and
- Provides details of any common property resources that will be acquired.

4.4 Socioeconomic Information and Profile

This section outlines the results of the social impact assessment, the census survey, and other studies, with information and/or data disaggregated by gender, vulnerability, and other social groupings, including:

- Define, identify, and enumerate the people and communities to be affected;

- Describe the likely impacts of land and asset acquisition on the people and communities affected taking social, cultural, and economic parameters into account;
- Discuss the project's impacts on the poor, indigenous and/or ethnic minorities, and other vulnerable groups; and
- Identify gender and resettlement impacts, and the socioeconomic situation, impacts, needs, and priorities of women.

4.5 Information Disclosure, Consultation, and Participation

This section:

- Identifies project stakeholders, especially primary stakeholders;
- Describes the consultation and participation mechanisms to be used during the different stages of the project cycle;
- Describes the activities undertaken to disseminate project and resettlement information during project design and preparation for engaging stakeholders;
- Summarizes the results of consultations with affected persons (including host communities), and discusses how concerns raised and recommendations made were addressed in the resettlement plan;
- Confirms disclosure of the draft resettlement plan to affected persons and includes arrangements to disclose any subsequent plans; and
- Describes the planned information disclosure measures (including the type of information to be disseminated and the method of dissemination) and the process for consultation with affected persons during project implementation.

4.6 Grievance Redress Mechanisms

This section describes mechanisms to receive and facilitate the resolution of affected persons' concerns and grievances. It explains how the procedures are accessible to affected persons and gender sensitive.

4.7 Legal Framework

This section:

- Describes national and local laws and regulations that apply to the project and identify gaps between local laws and World Bank's policy requirements; and discuss how any gaps will be addressed.
- Describes the legal and policy commitments from the executing agency for all types of displaced persons;
- Outlines the principles and methodologies used for determining valuations and compensation rates at replacement cost for assets, incomes, and livelihoods; and set out the compensation and assistance eligibility criteria and how and when compensation and assistance will be provided.
- Describes the land acquisition process and prepare a schedule for meeting key procedural requirements.

4.8 Entitlements, Assistance and Benefits

This section:

- Defines displaced persons' entitlements and eligibility, and describes all resettlement assistance measures (includes an entitlement matrix);
- Specifies all assistance to vulnerable groups, including women, and other special groups; and.
- Outlines opportunities for affected persons to derive appropriate development benefits from the project.

4.9 Relocation of Housing and Settlements

This section:

Describes options for relocating housing and other structures, including replacement housing, replacement cash compensation, and/or self-selection (ensure that gender concerns and support to vulnerable groups are identified);

- Describes alternative relocation sites considered; community consultations conducted; and justification for selected sites, including details about location, environmental assessment of sites, and development needs;
- Provides timetables for site preparation and transfer;
- Describes the legal arrangements to regularize tenure and transfer titles to resettled persons;
- Outlines measures to assist displaced persons with their transfer and establishment at new sites;
- Describes plans to provide civic infrastructure; and
- Explains how integration with host populations will be carried out.

4.10 Income Restoration and Rehabilitation

This section:

- Identifies livelihood risks and prepare disaggregated tables based on demographic data and livelihood sources;
- Describes income restoration programs, including multiple options for restoring all types of livelihoods (examples include project benefit sharing, revenue sharing arrangements, joint stock for equity contributions such as land, discuss sustainability and safety nets);
- Outlines measures to provide social safety net through social insurance and/or project special funds;
- Describes special measures to support vulnerable groups;
- Explains gender considerations; and
- Describes training programs.

4.11 Resettlement Budget and Financing Plan

This section:

- Provides an itemized budget for all resettlement activities, including for the resettlement unit, staff training, monitoring and evaluation, and preparation of resettlement plans during loan implementation.
- Describes the flow of funds (the annual resettlement budget should show the budget scheduled expenditure for key items).

- Includes a justification for all assumptions made in calculating compensation rates and other cost estimates (taking into account both physical and cost contingencies), plus replacement costs.
- Includes information about the source of funding for the resettlement plan budget.

4.12 Institutional Arrangements

This section:

- Describes institutional arrangement responsibilities and mechanisms for carrying out the measures of the resettlement plan;
- Includes institutional capacity building program, including technical assistance, if required;
- Describes role of NGOs, if involved, and organizations of affected persons in resettlement planning and management; and
- Describes how women's groups will be involved in resettlement planning and management.

4.13 Implementation Schedule

This section includes a detailed, time bound, implementation schedule for all key Resettlement and rehabilitation activities. The implementation schedule should cover all aspects of resettlement activities synchronized with the project schedule of civil works construction, and provide land acquisition process and timeline.

4.14 Monitoring and Reporting

This section describes the mechanisms and benchmarks appropriate to the project for monitoring and evaluating the implementation of the resettlement plan. It specifies arrangements for participation of affected persons in the monitoring process. This section will also describe reporting procedures.

5.0 Abbreviated Resettlement Action Plan

Outline of (Abbreviated) Resettlement Action Plan

i. **Project Description**: Identify Project location and its features and implementing agencies.
ii. **Census Survey of Displaced Persons and Valuation of Assets**: Potential displacement due to proposed sub-project, assets lost and people displaced from homes or livelihood, and methodology to be used in valuing losses to determine their replacement cost.
iii. **Legal and Regulatory Framework**: Describe key national and donor policies related to land acquisition, payment of compensation and entitlements. Explain how CLICK and WB safeguard policies will be complied with.
iv. **Eligibility, Description of Compensation and Other Resettlement Assistance to be provided**: Describe the packages of compensation and other resettlement measures and other assistances that will assist each category of eligible displaced persons to achieve sub project the objectives.
v. **Consultations**; Discuss the consultation and participation process in the light of CLICK and WB safeguard requirements.

vi. **Institutional Responsibility for Implementation and Procedures for Grievance Redress:** Identify main tasks and responsibilities in planning, negotiating, consulting, approving, coordinating, implementing, grievance redress, financing, monitoring and evaluation of the resettlement and rehabilitation.

vii. **Arrangements for Monitoring and Implementation; and Specify the arrangements for M&E**:

viii. **Timetable and Budget:** Prepare an Implementation Schedule including all resettlement activities from preparation to implementation.