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Pakistan: Emergency Flood Assistance Project

Prepared by Project Management Office (PMO), Irrigation Department, Government of Khyber Pakhtunkhwa, for the Islamic Republic of Pakistan and the Asian Development Bank (ADB).

NOTES

- (i) The fiscal year (FY) of the Government of the Islamic Republic of Pakistan and its agencies ends on 30 June.
- (ii) In this report “\$” refers to US dollars.

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List of Abbreviations

ADB	Asian Development Bank
ID	Irrigation Department
DDCSC	Detailed Design & Construction Supervision Consultant
DED	Detailed Engineering Design
DPD	Deputy Project Director
EFAP	Emergency Flood Assistance Project
EMP	Environmental Management Plan
EMR	Environmental Management Report
ESMF	Environmental & Social Management Framework
FPW	Flood Protection Work
GRM	Grievance Redress Mechanism
GoP	Government of Pakistan
HSE	Health Safety and Environment
IA	Implementation Agency
IEE	Initial Environmental Examination
IP	Indigenous People
IR	Involuntary Resettlement
LGRC	Local Grievance Redress Committee
PD	Project Director
PDNA	Post-Disaster Needs Assessment
PMC	Project Management Consultants
PPE	Personal Protective Equipment
PMO	Project Management Office
REA	Rapid Environment Assessment
RoW	Right of Way
SAEMR	Semi-annual Environmental Monitoring Report
SDDR	Social Due Diligence Report
SSEMP	Site Specific Environmental Management Plan
UN	United Nations
TA	Technical Assistance
ToRs	Terms of Reference
VLD	Voluntarily Land Donation

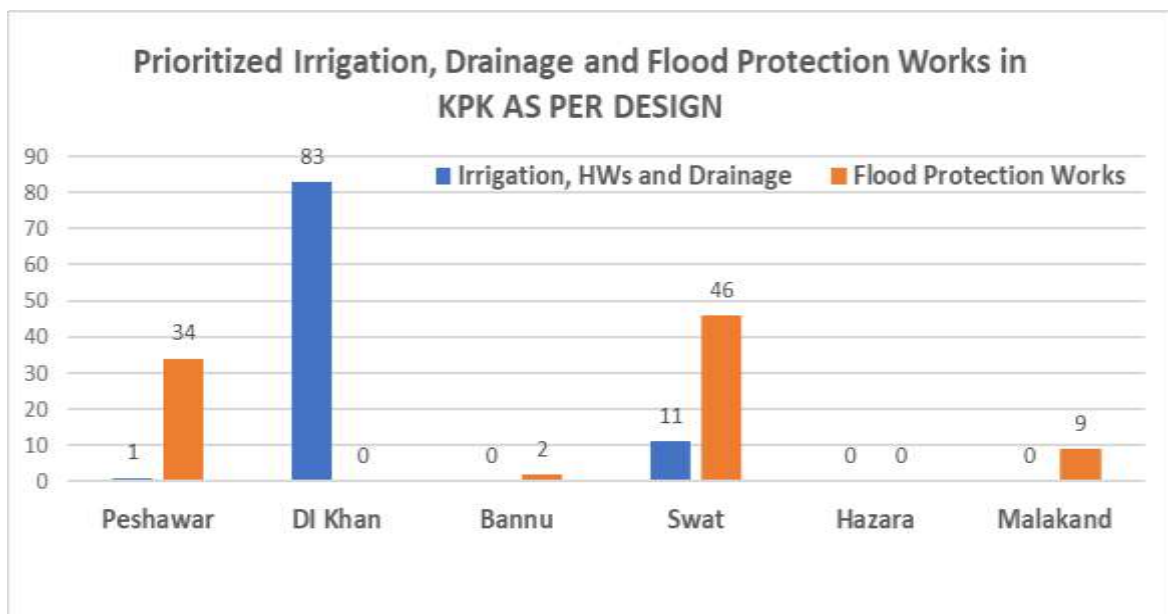
1 INTRODUCTION

1.1 Preamble

1. This report represents the Semi - Annual Environmental Monitoring Report (SAEMR) for the Emergency Flood Assistance Project (Khyber Pakhtunkhwa Irrigation Department Component).
2. This report is the 5th SAEMR covering the period of July to December 2025.

1.2 Headline Information

3. Khyber Pakhtunkhwa component of Emergency Flood Assistance Project is being implemented initially in six (06) irrigation circles as per PC-1 and now in five (05) irrigation circles of the Khyber Pakhtunkhwa Province as per design. The proposed project comprises of one hundred and twenty-two (122) sub-projects located in the southern and northern regions of Khyber Pakhtunkhwa related to irrigation works. Out of the proposed 122 schemes, 72 (60%) are located in the South region of KP whereas 50 (40%) of the schemes are located in the North of the KP, while Retroactive/Advance Contracting Schemes are 22 and one is related to bridge at Munda Headwork's. The area- wise package distribution is given in the pie chart below (**Figure 1**). The priority of the work packages is identified with the consent of client.



Note: In design Stage the retroactive works (19Nos.) shall be considered separately

Figure 1: Area wise Package Distribution

4. As per PC-1, these sub-projects have been identified to be taken up under the project on priority basis including seventy-nine (79) irrigation and drainage structures, sixty-four (64) flood management infrastructures, and strengthening/re-sectioning of various protection embankments. For the ease of design and implementations, the project has been divided into the Packages and sub-projects (schemes). To cover the South and North regions of Khyber Pakhtunkhwa, the project was initially divided into 16 packages and at present, there are 14 packages. Out of these 14 packages, 8 packages are

allocated for the south region (primarily consists of canals and drains) and 6 packages (mainly on flood protection works) are allocated for the north region. **Figure 2** shows the package-wise distribution of the number of schemes.

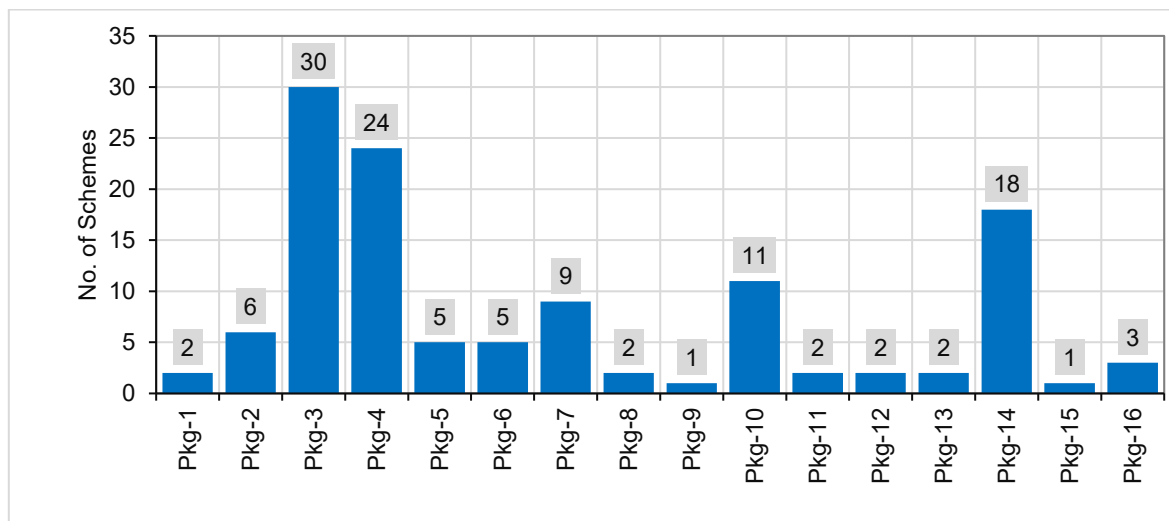


Figure 2: Package-wise Distribution of the Number of Schemes

5. The Contract Agreement between Khyber Pakhtunkhwa Irrigation Department and the Consultants was signed on April 07, 2023. As per SC Clause 13.1, effective date of the Consultancy Services is April 14, 2023. Meetings with the Client and ADB were done to present a way forward, anticipated time and cost over-run risks. The first draft of the inception report covering the review of existing information, data, reports, surveys, studies, investigations, design reports and safeguards documents of the flood effected infrastructure was submitted at the end of June 2023. After June 2023, the work on retroactive and rehabilitation works was initiated by the consultants. Numbers of locations in south and north regions of Khyber Pakhtunkhwa were identified to be taken up under the proposed project on priority basis for following two components:
 - Retroactive (Restoration work) schemes; and
 - Repair and Rehabilitation works.
6. The preparation of E&S safeguard documents as per the ADB's approved ESMF of the above two components was initiated in June, 2024 onwards, along with the commencement of civil works. Progress of each sub-project is mentioned in the Table 1 below.

Table 1: Status of EFAP Sub-Projects

Sr. No.	Package Number	Contractor	Contract Agreement Signing Date	Date of commencement of Civil Work	Tentative Completion Date	Physical Progress (%)	
						Planned	Actual
1	EFAP-KPID- CW-01	Dropped					
2	EFAP-KPID- CW-02	M/S Tribal Global Construction	07-02-2024	16-07-2024	15-04-2025	100	100
3	EFAP-KPID- CW-03	M/s M. Younas Builders	26-12-2023	09-01-2024	21-02-2026	100	87.20
4a	EFAP-KPID- CW-04 (lot I)	M/s Abdul Hakim and Sons	22-12-2023	10-01-2024	09-01-2026	86.93	43.11
4b	EFAP-KPID- CW-04 (lot II)	M/s Abdul Hakim and Sons	27-12-2023	10-01-2024	09-01-2026	91.33	39
5	EFAP-KPID- CW-05	M/S Atif Kasteer Sarwar JV	23-04-2024	09-07-2024	31-04-2026	75.0	61.01
6	EFAP-KPID- CW-06	M/s CEMCON (Pvt) Limited	15-05-2024	22-05-2024	31-03-2026	65.33	61.05
6A	EFAP-KPID- CW-06A	M/s M. Younas Builders	08-05-2025	22-05-2025	16-02-2026	32.30	18.63
7	EFAP-KPID- CW-07	M/s M. Younas Builders	15.02.2024	29-02-2024	28-12-2025	93.70	78.50
8	EFAP-KPID- CW-08 (lot II)	M/s National RCC	29-12-2023	12-01-2024	31-07-2025	75.0	61.01
9	EFAP-KPID- CW-09	M/s National RCC WORKS (pvt) Ltd	16-04-2024	30-04-2024	24-07-2025	100	72
10	EFAP-KPID- CW-10	Dropped					
11	EFAP-KPID- CW-11	M/s Ali & Co	26-02-2024	11-03-2024	30-09-2025	100	94.05
12	EFAP-KPID- CW-12	M/s M. Younas Builders	25-03-2024	08-04-2024	21-10-2025	95.99	89.40
13	EFAP-KPID- CW-13	M/s ZKB & MCC (JV)	2/9/2024	26-02-2024	25-05-2025	100	95
14	EFAP-KPID- CW-14	M/s ZKB & MCC (JV)	09-02-2024	26-02-2024	29-11-2025	100	76
15	EFAP-KPID- CW-15	M/s New Khan Builders NKB	22-12-2023	22-12-2023	21-06-2024	100	100

Sr. No.	Package Number	Contractor	Contract Agreement Signing Date	Date of commencement of Civil Work	Tentative Completion Date	Physical Progress (%)	
						Planned	Actual
16	EFAP-KPID- CW-16	M/s M. Younas Builders	1/11/2024	25-01-2024	24-11-2025	92	89.45

2 PROJECT DESCRIPTION AND CURRENT ACTIVITIES

2.1 Project Description

7. The ADB is partnering with the Government of the Khyber Pakhtunkhwa Province to implement the Emergency Flood Assistance Project (EFAP), this includes sub-projects distributed throughout the Khyber Pakhtunkhwa province.
8. Pakistan is a flood prone country and one of the ten countries, most affected by climate change in the world.¹ Flooding in Pakistan is primarily caused by heavy concentrated rainfall in the river catchments during the monsoon season which typically occurs during July through September. In recent history, Pakistan witnessed unprecedented flooding in Khyber Pakhtunkhwa in 2010 and 2022. The occurrence of these flood events have proven how severely climate change has impacted our region. The flood of 2022 was the result of a prolonged intense monsoon, subsequent to the unprecedented heat wave in April-June 2022, this was followed by intense rains experienced across the country, highlighting our poor planning towards adopting climate resilient designs for irrigation and road infrastructure.
9. The proposed EFAP was developed in response to the Government of Pakistan's request to the ADB on October 6, 2022, for assistance in responding to countrywide floods. EFAP is aimed at facilitating the economic recovery of flood-affected provinces, which includes Sindh, Baluchistan, and Khyber Pakhtunkhwa. It will fund the rehabilitation and reconstruction of high-priority infrastructure (irrigation, drainage, flood protection structures in said affected areas).
10. Khyber Pakhtunkhwa has suffered great damage from the devastating floods. EFAP will support the restoration of economic productivity and livelihoods for the rural populations affected by the floods.
11. A post-disaster needs assessment (PDNA)² - an effort led by the Government of Pakistan (GoP) and supported by a core team comprising of ADB, the European Union, United Nations (UN) agencies, and the Japan International Cooperation Agency with facilitation from the United Nations Development Programme and the World Bank was concluded on 28 October 2022. This initiative provides the bases for a disaster recovery framework, and arrangements for an effective, efficient and coordinated post-flood recovery and reconstruction plan. ADB with the assistance from financiers Japan Fund for Prosperous and Resilient Asia and the Pacific (JFPR) has proposed an emergency assistance to the GoP through EFAP. GoP and ADB agreed on financing the total EFAP at \$531 million out of which approximately \$62 million is the component of the Irrigation Department of Khyber Pakhtunkhwa.
12. The Khyber Pakhtunkhwa Irrigation Department (Project Management Office (PMO) of the EFAP) is the implementing agency (IA). Project Management Consultants (PMC)

¹ D. Eckstein, V. Kunzel, and L. Schafer. 2021. *Global Climate Risk Index 2021: Who Suffers Most from Extreme Weather Events? Weather-Related Loss Events in 2019 and 2000–2019*

² Government of Pakistan, Ministry of Planning, Development & Special Initiatives. 2022. *Pakistan Floods 2022: Post-Disaster Needs Assessment*. Islamabad.

for detailed engineering design (DED) and construction supervision will oversee all the sub-projects scattered throughout the province.

13. **Project Impact, Outcome and Output:** The overall EFAP is going to be an inclusive and resilient recovery from the 2022 floods. It will have the flood-affected infrastructure and livelihoods improved. These investments will help rehabilitate / restore flood-damaged irrigation, drainage, and flood risk management infrastructure in Khyber Pakhtunkhwa and mitigate the risk of flood damage to crops, infrastructure, and communities.
14. It will strengthen, rehabilitate, and reconstruct priority irrigation structure including (i) diversions, (ii) storage and conveyance systems, (iii) drainage channels, and (iv) flood risk management structures in Khyber Pakhtunkhwa. Irrigation and flood risk management infrastructures will also be upgraded and made to incorporate multi-hazard-resilient design and nature-based solutions.
15. **Key Features of the Project:** This project will strengthen, rehabilitate, and reconstruct both priority irrigation and drainage infrastructure, and flood management structures in Khyber Pakhtunkhwa. Under the Khyber Pakhtunkhwa component, there are about 143 sub-projects including, 79 irrigation and drainage structures, 64 flood management infrastructures, and strengthening/re-sectioning various protection embankments in the north and south regions.
16. To conclude, the Khyber Pakhtunkhwa component of the EFAP has been divided into two major components, this is to ensure the project is finished within the anticipated time frame, avoid any delays and improve project management. These two major components will consist of:
 - Retroactive (Restoration work) schemes; and
 - Repair and Rehabilitation works.
17. In order to immediately restore the canal system in various areas of the province, 20 restoration/retroactive schemes of already existing infrastructure in 05 divisions of Khyber Pakhtunkhwa were recommended for immediate implementation. These were found technically viable, economically feasible, and environmentally and socially acceptable. Accordingly, the procurement of these schemes were carried out by their respective irrigation offices, details of which are provided below:

Table 2: No. of Retroactive Schemes and Estimated Cost

Sr. No.	Irrigation Division	No. of Schemes	Estimated Cost (millions)
1	Charsadda Irrigation Division	4	303
2	D I Khan (CRBC Irrigation Division)	7	118
3	Dir Irrigation Division	7	329
4	Swat Irrigation Division	1	79
5	Malakand Irrigation Division	1	100
Total		20	929

18. The location map of these schemes are shown in **Figure 3** and the summary provided in **Annex-I**.
19. **Repair and Rehabilitation works** of the EFAP project was divided into 16 Packages initially as per PC-1 and now 14 packages at present as per design. Out of these 14

Packages, 8 packages are allocated towards the southern region and 6 packages are allocated towards the north.

- The South region primarily consists of canals and drains, including major canal systems.
- The focus in the north region is mainly on flood protection works (FPWs).

20. The summary of these packages is provided in **Annex-II** and the location shown in **Figure 4**.

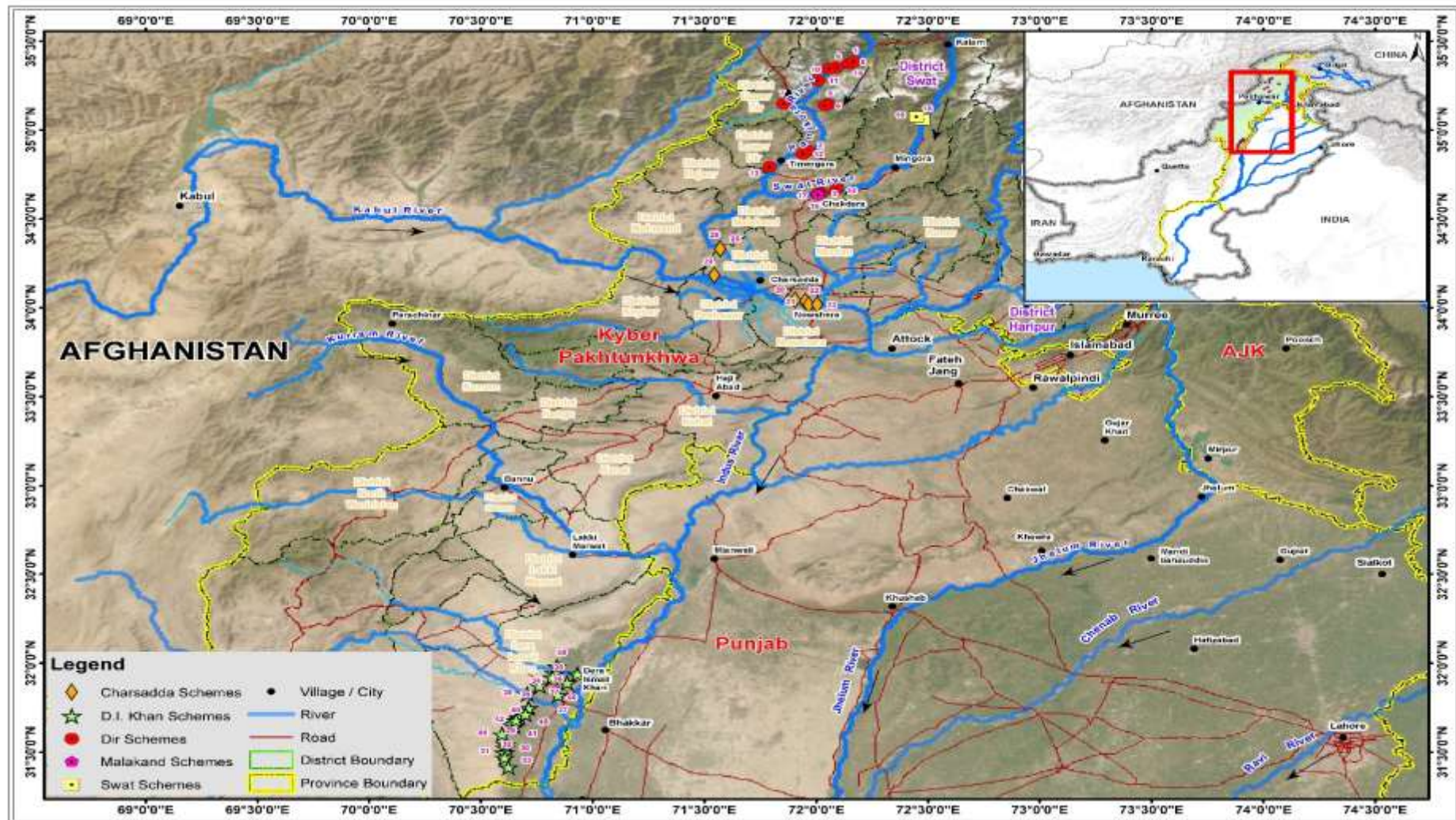


Figure 3: Map showing Locations under Different Schemes under Restoration Works

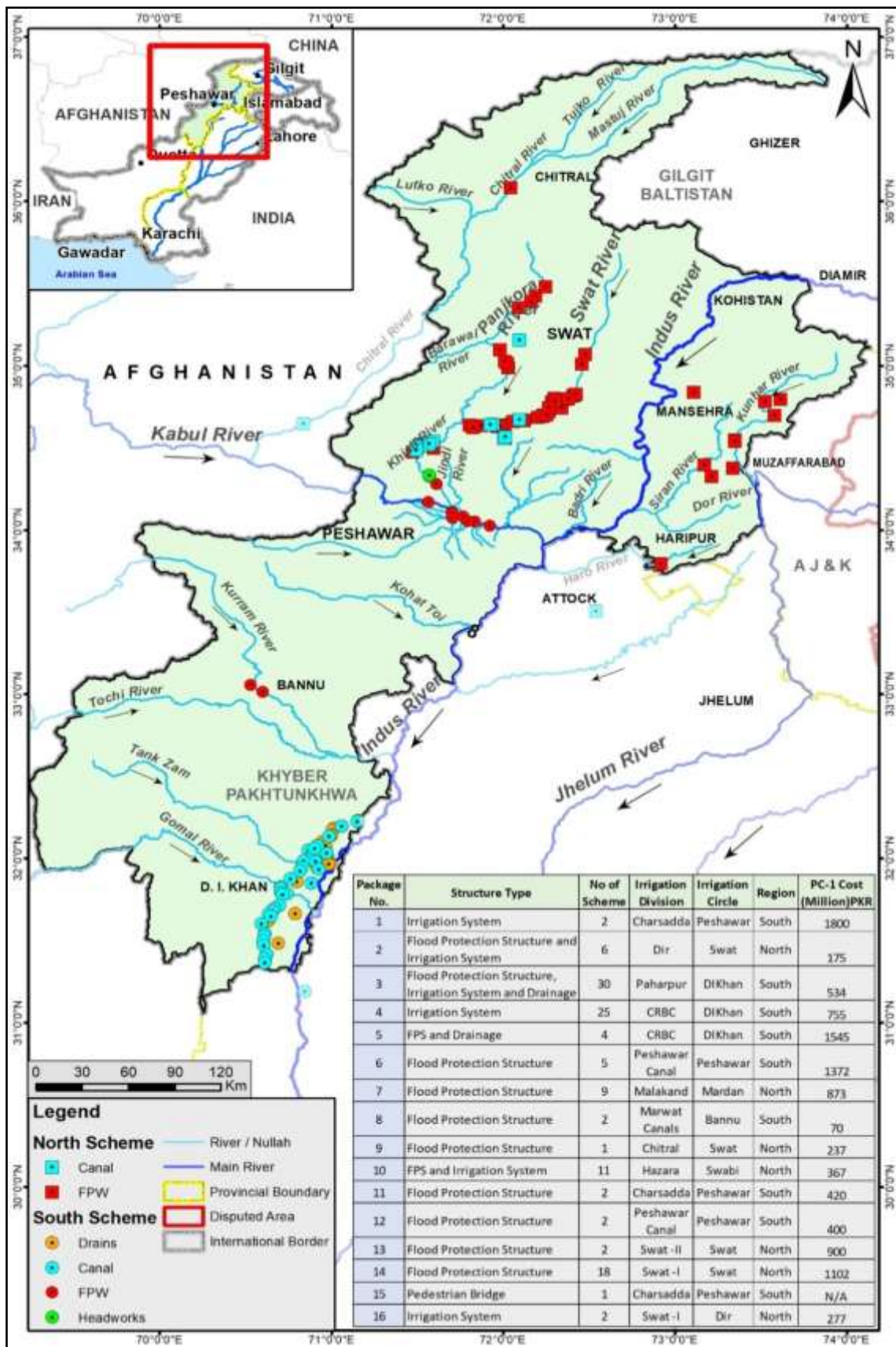


Figure 4: Map showing Locations under Different Packages of Repair and Rehabilitation Works

2.2 Project Contracts and Management

21. The Government of Khyber Pakhtunkhwa, through the Irrigation Department, serves as the executing agency for the project, while the Project Management Office (PMO) acts as the implementing agency.
22. The newly established PMO of EFAP will now oversee the overall project implementation and coordination of EFAP. Previously, PMO of Pehur High Level Canal Extension Project was held responsible for this task which was jointly agreed upon between the borrower and ADB and is in accordance with the policies and procedures of both the GoP and ADB.
23. The Contract Agreement between Khyber Pakhtunkhwa Irrigation Department and the Consultants was signed on April 07, 2023. As per SC Clause 13.1, the effective date of the Consultancy Services is April 14, 2023 for Detailed Design & Construction Supervision Consultant's (DDCSC) of all the sub-projects scattered throughout the province.
24. **Table 3** provides the environmental and social safeguard teams for this project along with their respective roles.

Table 3: Key Project Stakeholders and their Contacts

Organization	Discipline/ Designation	Deployed Team	Email Id/Contact No.
PMO	Project Director(PD)	Javed Khattak	efapirrigation@gmail.com sardarzafar68@yahoo.com
	Deputy Director (Focal Person-Environment)	Ayaz Ul Haq (Deputy Director E&S)	ayazulhaq2025@gmail.com
ADB	Environment Specialist	Nurlan Djenchuraev	ndjenchuraev@adb.org
	Environment Specialist (Consultant)	Abdul Hadi	ahadi.consultant@adb.org
NESPAK	Team Leader	Nasir Khan Afridi	nafridi1969@yahoo.com
	Environment and Social Specialist	Mir Ghazanfar Afzal	Ghazanfar.afzal@nespak.com.pk
	Environmental Engineer	Fahad Saleem	fsaleem660@gmail.com
	Social Specialist	Wasim Abbas	wasimabbasnaqvi@yahoo.com
	Gender Specialist	Ms Nayyar Saba	nayyerfcc@gmail.com
Contractor	Project Manager(Package 2)	Irfan Khan (Tribal Global Contractors)	03369725008
Contractor	Project Manager(Package 3)	Rawied (Younas Contractor)	0313-9177222
Contractor	Project Manager(Package 4 Lot-1)	Irfan (M/S Abdul Hakim & Sons)	0313-9446501

Organization	Discipline/ Designation	Deployed Team	Email Id/Contact No.
Contractor	Project Manager(Package 4 Lot-2)	Irfan (M/S Abdul Hakim & Sons)	0313-9446501
Contractor	Project Manager(Package 5)	Shoaib(M/S Atif Kasteer Sarwar JV	0344-9389028
Contractor	Project Manager(Package 6)	Imran (M/S Cemcon Pvt. Ltd)	0312-1954414
Contractor	Project Manager(Package 6A)	Rawied (Younas Contractor)	0313-9177222
Contractor	Project Manager(Package 7)	Zain (Younas Contractor)	0313-9838061
Contractor	Project Manager(Package 8 Lot-2)	Hamid (M/s Habib Khan Builders)	0333-9263663
Contractor	Project Manager(Package 9)	Altaf Khan(National RCC)	0333-5756596
Contractor	Project Manager(Package 11)	Ateeq (Ali and Co)	0343-4950854
Contractor	Project Manager(Package 12)	Imranullah (Younas Contractor)	0313-9080038
Contractor	Project Manager(Package 13)	Munawar Memon(ZKB JV ACC) M. Umair (ESHS Expert)	0304-9787481 +92 333 6055094
Contractor	Project Manager(Package 14)	Munawar Memon (ZKB JV ACC) M. Umair (ESHS Expert)	0304-9787481 +92 333 6055094
Contractor	Project Manager(Package 15)	Shah Jahan (M/s New Khan & Builders)	0346-9838139
Contractor	Project Manager(Package 16)	Zain (Younas Contractor)	0313-9838061

25. To meet ADB safeguards requirements, the PMO has the support of consultants, responsible for implementing environmental and social safeguards policies. The Deputy Director Environment of the PMO serves as the focal person for Environmental and Social Safeguards. A team of consultants supports PMO, including an Environmental Specialist and Social Safeguard Specialist, is in place to assist the DD-Environment in the smooth and timely preparation and implementation of the Rapid Environment Assessment (REA), Involuntary Resettlement (IR) and Indigenous Peoples (IP)

Checklists, Social Due Diligence Report (SDDR) and Environmental Management Plan (EMP) / Initial Environmental Examinations (IEE). This team is responsible for ensuring the timely submission of Site-Specific Environmental Management Plans (SSEMPs) by contractors, reviewing these SSEMPs for compliance with environmental safeguards requirements, conducting environmental and social monitoring at construction sites, screening, performing due diligence, and reviewing monthly monitoring reports submitted by contractor and consultants, among other tasks.

26. At the field level, positions for environmental staff have been included in the bid documents. Contractors for all packages were required to hire environmental officers/Health Safety and Environment (HSE) Officers, who will be stationed at the construction site and responsible for preparing SSEMPs and implementing them accordingly. ADB is responsible for reviewing REA, IR, IP checklists, EMPs, IEEs, Eco-DDR, SDDRs, and SSEMPs, which are submitted by the PMO.

2.3 Project Work Details

2.3.1 Retroactive Works Details

Engineering and Technical Provisions:

27. The design and technical parameter of the existing infrastructure were kept intact. Only the restoration of these schemes were recommended to be carried out as per original design and drawings. No change in cross-section, raising etc. was permissible.

Project Activities:

28. The proposed scheme involved the restoration of banks around the disties at the breached areas, restoration of guide bank with stone pitching on slope and gabion apron, restoration of channels involved mud and debris clearance, transportation of material, earthworks, lining, filling and back filling on slopes, finishing work and clearance of leftover material due to recent floods.

Land and Other Issues:

29. The restoration works of the damaged water channel and a few flood protection walls were carried out within the existing ROW which was damaged due to the flood. However, other works especially related to flood protection walls involved private lands, which the locals agreed to donate, for these works. In this regard, Voluntarily Land Donation (VLD) agreements were made, meanwhile for some packages, VLD proformas are in progress, subject to verification from the revenue department, with land owners mainly in Nowshera, Peshawar, Swat, Malakand, Dir, Charsadda, Bannu & Chitral. There were no indigenous people in the sub-Project area. As the activities involved the restoration of banks around the water channels/carriers disties at the breached areas due to recent floods, there were no adverse impacts of acquisition, assets displacement and loss of livelihood.

2.3.2 Repair and Rehabilitation Works Details

30. Major Construction work/activities for drains and disties involved:

- Transportation of local construction material;
 - Restoration of distributary prism by brick/stone side protection;
 - Restoration of lining of distributary;
 - Reconstruction of retaining walls;
 - Restoration and provision of new stone pitching;
 - Desilting and cleaning of drains (including Sakranda and Debris);
 - Distributary bank restoration/raising; and
 - Rehabilitation of culverts etc.
31. Major construction works/activities involves in protection works:
- Transportation of material for construction of Gabion Wall;
 - Foundation preparation;
 - Gabion Basket Assembly;
 - Gabion filling;
 - Drainage consideration for Gabion Walls; and
 - Provision of Free Drainage Granular Backfill
32. The work was carried out within the existing ROW which was damaged due to the flood. No land acquisition and resettlement was involved.

2.4 PMC Activities during Reporting Period

33. The PMC was mobilized on April 14, 2023. The following activities were conducted during the reporting period of July to December 2025.

2.4.1 Site Visits and E&S Compliance

34. The PMC offices are situated in Lahore and Peshawar. The Consultants' project team is responsible for the Detailed Design of the project and is led by a Team Leader stationed in the Lahore office. Specialists assigned to work on the detailed design of structures are located in Lahore, Peshawar and in the field for data collection and investigations. All other key staff for the design and construction phase of the project have been mobilized. For E&S and OHS Compliance, formation of LGRC and Female LGRC, VLD process, Public Consultations, Social Due Diligence Reports (SDDR), frequent site visits to all packages were conducted during the 3rd and 4th quarter of 2025.

2.4.2 Construction Stage E&S Compliance

35. E&S Compliance visits at all active sites were conducted during the 3rd and 4th quarter of 2025. According to the EMP, a detailed presentation was held on the E&S Compliance during the project implementation stage. It was highlighted that the following items need to be considered (at minimum) in the SSEMP:
- Contractor's HSE Policy

- Availability of ESHS Staff
- Template of Work Method Statements (WMS) for All Construction Activities
- Contractor's Organogram for SSEMP implementation at site
- Site Rehabilitation and Restoration Plan
- Labor Accommodation and Management Plan
- Community Relations and Management Plan

36. The E&S compliance activities were also carried out at all the active sites of Swat, Dir, DI Khan, Malakand, Chitral and Peshawar Irrigation Circles, where the contractor had been mobilized. The pictorial evidence is shown in below plates. Various consultations and site E&S visits were carried out at various packages as evident from the pictures below and filled E&S and OHS compliance checklists have been provided in the **Annex-VII**. The summarized findings of the E&S visits are provided in the Table 4 below.

Table 4: Package-wise E&S Summary and Findings

Sr. No.	Package	Contractor	E&S Compliance Visit Summary and Finding	Corrective Action Required	Timeline for Resolution	Responsibilities
1.	Package 2: EFAP-KPID- CW-02: Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Dir Irrigation Division (Category C Project w.r.t REA, IR and IP)	M/s Tribble Global Contractor	• Non-availability of SSEMP at site • Non-availability of E&S Specialist at site • Limited use of mandatory PPEs to Workers at site • Non-availability of HSE Information and Signage (Safety signing, site barricading and local awareness must be ensured) • Non Compliances in Regular Monitoring as per EMP • Monthly Contractor's E&S Reporting	A training sessions has been arranged with the contractor for SSEMP finalization, permanent hiring of E&S Staff at site E&S compliance at site and monthly E&S progress report.	First Quarter of 2026	Contractor
2.	Package 03: Repair and Rehabilitation of Canals and Drains, Paharpur Irrigation Division (Category C Project w.r.t REA, IR and IP)	M/s M. Younas Builder (Pvt.) Limited	• Non-availability of SSEMP at site • Non-availability of E&S Specialist at site • Limited use of mandatory PPEs to Workers at site • Non-availability of HSE Information and Signage (Safety signing, site barricading and local awareness must be ensured) • Worker and staff regular trainings • Poor Waste Management	SSEMP finalization, Permanent Hiring of E&S Staff at site E&S compliance at site	First Quarter of 2026	Contractor

Sr. No.	Package	Contractor	E&S Compliance Visit Summary and Finding	Corrective Action Required	Timeline for Resolution	Responsibilities
			Non Compliances in Regular Monitoring as per EMP			
3.	Package 04: Rehabilitation of Canals / Distributaries Works: Lot-1: CRBC Irrigation Division DI Khan & Lot-2: CRBC Irrigation Division DI Khan	M/s Abdul Hakim Khan & Sons (Pvt.) Limited	Work Stopped	--	--	--
4.	Package 05: Rehabilitation of Drains & FCCs in CRBC Irrigation Division DI Khan (Category C Project w.r.t REA, whereas Category B w.r.t. IR and IP)	M/S Atif Kasteer Sarwar JV	- Non-availability of SSEMP at site - Non-availability of E&S Specialist at site - Limited use of mandatory PPEs to Workers at site - Non-availability of lifesaving equipment for works near water channels/rivers - Non-availability of HSE Information and Signage (Safety signing, site barricading and local awareness must be ensured) - Worker and staff regular trainings - Poor Waste Management - Non Compliances in Regular Monitoring as per EMP - Monthly Contractor's E&S Reporting	SSEMP finalization, Hiring of E&S Staff E&S compliance at site Monthly E&S progress report.	First Quarter of 2026	Contractor
5.	Package 6: Repair and Rehabilitation of Irrigation	M/s CEMCON Pvt. Ltd.	Non-availability of AEAN SSEMP at site	SSEMP Updated as per AEAN,, E&S compliance at site	First Quarter of 2026	Contractor

Sr. No.	Package	Contractor	E&S Compliance Visit Summary and Finding	Corrective Action Required	Timeline for Resolution	Responsibilities
	Systems and Flood Protection Structures, Nowshera (Category C Project w.r.t REA, IR and IP)		- Limited use of mandatory PPEs to Workers at site - Non-availability of lifesaving equipment for works near water channels/rivers - Limited HSE Information and Signage (Safety signing, site barricading and local awareness must be ensured) - Worker and staff regular trainings - Non Compliances in Regular Monitoring as per EMP			
6.	Package 6A: Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Nowshera	M/s M. Younas Builder (Pvt.) Limited	- Non-availability of SSEMP at site - Non-availability of E&S Specialist at site - Limited use of mandatory PPEs to Workers at site - Non-availability of lifesaving equipment for works near water channels/rivers - Non-availability of HSE Information and Signage (Safety signing, site barricading and local awareness must be ensured) - Worker and staff regular trainings	SSEMP finalization, Permanent Hiring of E&S Staff at site E&S compliance at site	First Quarter of 2026	Contractor

Sr. No.	Package	Contractor	E&S Compliance Visit Summary and Finding	Corrective Action Required	Timeline for Resolution	Responsibilities
			Non Compliances in Regular Monitoring as per EMP			
7.	Package 7: Rehabilitation of Flood Protection Works/Structures, Malakand Irrigation Division, Swat (Category C Project w.r.t REA, IR and IP)	M/s M. Younas Builder Pvt. Limited	- Non-availability of SSEMP at site - Limited use of mandatory PPEs to Workers at site - Non-availability of lifesaving equipment for works near water channels/rivers - Non-availability of HSE Information and Signage (Safety signing, site barricading and local awareness must be ensured) - Worker and staff regular trainings - Non Compliances in Regular Monitoring as per EMP	SSEMP finalization, E&S compliance at site	First Quarter of 2026	Contractor
8.	Package 08: Rehabilitation/ Restoration of Flood Protection Works Lot-2 Marwat Canal Irrigation Division (Category C Project w.r.t REA, IR and IP)	M/s Habib Khan Builders	- Non-availability of SSEMP at site - Non-availability of E&S Specialist at site - Limited use of mandatory PPEs to Workers at site - Non-availability of HSE Information and Signage (Safety signing, site barricading and local awareness must be ensured) - Worker and staff regular trainings	SSEMP finalization, Hiring of E&S Staff E&S compliance at site Monthly E&S progress report.	First Quarter of 2026	Contractor

Sr. No.	Package	Contractor	E&S Compliance Visit Summary and Finding	Corrective Action Required	Timeline for Resolution	Responsibilities
			- Non Compliances in Regular Monitoring as per EMP - Monthly Contractor's E&S Reporting			
9.	Package 9: Rehabilitation of Flood Protection Structures / Drainage System in Chitral Irrigation Division	M/s National RCC	- Non-availability of SSEMP at site - Non-availability of E&S Specialist at site - Limited use of mandatory PPEs to Workers at site - Non-availability of lifesaving equipment for works near water channels/rivers - Limited HSE Information and Signage (Safety signing, site barricading and local awareness must be ensured) - Poor Waste Management - Non Compliances in Regular Monitoring as per EMP - Worker and staff regular trainings - Monthly Contractor's E&S Reporting	SSEMP finalization, Hiring of E&S Staff E&S compliance at site Monthly E&S progress report.	First Quarter of 2026	Contractor
10.	Package-11: Rehabilitation of Flood Protection Works in Charsadda Irrigation Division	M/s Ali & Co	- Non-availability of SSEMP at site - Non-availability of E&S Specialist at site - Limited use of mandatory PPEs to Workers at site - Non-availability of lifesaving equipment for	SSEMP finalization, Hiring of E&S Staff E&S compliance at site Monthly E&S progress report.	First Quarter of 2026	Contractor

Sr. No.	Package	Contractor	E&S Compliance Visit Summary and Finding	Corrective Action Required	Timeline for Resolution	Responsibilities
			works near water channels/rivers • Non-availability of HSE Information and Signage (Safety signing, site barricading and local awareness must be ensured) • Worker and staff regular trainings • Non Compliances in Regular Monitoring as per EMP • Monthly Contractor's E&S Reporting			
11.	Package-12: Repair and Rehabilitation of Flood Protection Structures, Peshawar. Peshawar Irrigation Division	M/s M. Younas Builder (Pvt.) Limited	• Non-availability of SSEMP at site • Non-availability of E&S Specialist at site • Limited use of mandatory PPEs to Workers at site • Non-availability of lifesaving equipment for works near water channels/rivers • Limited HSE Information and Signage (Safety signing, site barricading and local awareness must be ensured) • Worker and staff regular trainings • Non Compliances in Regular Monitoring as per EMP	SSEMP finalization, E&S compliance at site Monthly E&S progress report.	First Quarter of 2026	Contractor

Sr. No.	Package	Contractor	E&S Compliance Visit Summary and Finding	Corrective Action Required	Timeline for Resolution	Responsibilities
			Monthly Contractor's E&S Reporting			
12.	Package 13: Repair and Rehabilitation of Flood Protection Structures, Swat. Swat Irrigation Division-II & I (Category C Project w.r.t REA, IR and IP)	M/s ZKB - MCC JV	- Non-availability of AEAN SSEMP at site - Limited use of mandatory PPEs to Workers at site - Limited lifesaving equipment for works near water channels/rivers	SSEMP update as per AEAN comments, PPEs compliance at site		
13.	Package 14: Repair and Rehabilitation of Flood Protection Structures, Swat. Swat Irrigation Division-II & I (Category C Project w.r.t REA, IR and IP)	M/s ZKB - MCC JV	- Non-availability of AEAN SSEMP at site - Limited use of mandatory PPEs to Workers at site - Limited lifesaving equipment for works near water channels/rivers	SSEMP update as per AEAN comments, PPEs compliance at site	First Quarter of 2026	Contractor
14.	Package 15: Repair and Rehabilitation of Munda Headwork's Bridge	M/s New Khan Builders NKB	Work Completed	--	--	--
15.	Package 16: Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Dir Irrigation Division (Category C Project w.r.t REA, IR and IP)	M/s M. Younas Builder Pvt. Limited	- Non-availability of SSEMP at site - Non-availability of E&S Specialist at site - Limited use of mandatory PPEs to Workers at site - Limited HSE Information and Signage (Safety signing, site barricading and local awareness must be ensured) - Worker and staff regular trainings - Non Compliances in Regular Monitoring as per EMP	SSEMP finalization, Hiring of E&S Staff E&S compliance at site	First Quarter of 2026	Contractor

2.4.3 Joint Visits and Meetings of ADB, PMO, and E&S Consultants

37. E&S team of NESPAK participated in ADB mission scheduled in first week of September 2025 for Chitral, Swat, and Mardan. The purpose of this visit was to engage with the local community, conduct site visits, and carry out social and environmental due diligence of the sub-works.

2.4.4 Updated of Project Categorization Reports along with the REA, IR and IP Checklists

38. Scope of work for the four packages i.e., Packages 9, 12, 13 and 14 was increased. For these packages, site visit and consultations have been carried out for these Packages, secondary data has been reviewed, and project categorization reports has been revised along with the REA, IR and IP Checklists considering the outcomes of ecological due diligence. The revised project categorization reports along with the REA, IR and IP Checklists has been submitted to ADB through PMO in the 4th quarter of 2025.

2.4.5 E&S Progress on Restoration and Repair Works

39. Package wise progress on E&S Safeguard document for complete EFAP Project is provided below:

Table 5: Package Wise Progress of EFAP Project

Sr. No	Package	E&S Progress
1.	Package 2: EFAP-KPID- CW-02: Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Dir Irrigation Division (Category C Project w.r.t REA, IR and IP)	Members of LGRC have been identified and the list had been notified since August 2024 by PMO for the following schemes. - Scheme-1 (U/S & D/S of Balambat Bridge, Rabat Bridge, Shalfalam Bridge, Khall Bridge, & Baroon Bridge) - Scheme-2 (Thal and Berikot) EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. Consultation with XENs for verification of Land Custodianship proformas from Revenue Department which has been completed and verified from revenue department. Combined SDDR of Pkg 2 and 16 submitted to PMO. Letter of Non-compliance of SSEMP has been sent to contractor for submission of SSEMP of Package 2. E&S Compliance visits of the package and subsequent sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction camps before security concerns.

Sr. No	Package	E&S Progress
2.	Package 03: Repair and Rehabilitation of Canals and Drains, Paharpur Irrigation Division (Category C Project w.r.t REA, IR and IP)	Members of LGRC have been identified and the list had been notified since August 2024 by PMO for the following schemes. • Scheme No.1 (Old Paharpur canal, Ketch Drain, Ketch Minor)) • Scheme No.2 (Band Kurai, Shahkot Minor, Main Drain, Girsal Drain, Jabbarwala Drain, Girsal Pond Drain) • Scheme No. 3 (Band Kurai Branch, Disty 3, Band Kurai Minor, Disty 2, Band Kurai Main Drain, Rakh Disty, Civil Minor) • Scheme No. 4 (Seed Farm Brach Drain, Largi Drain No.1, Pharapur Disty, Largi Drain No.2, Katgarh Branch Drain, Katgarh Branch Drain No.3) • Scheme No.5 (Bigwani minor, Takarwah Disty, Bilot Creek Drain) EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. Consultation with XENs for verification of Land Custodianship proformas from Revenue Department. ROW confirmation for the canals has been completed and the list was shared with the PMO for confirmation that has been verified by revenue department for both canals and drains for respective package. Consolidated SDDR for package 3,4 and 5 has been submitted. SSEMP has been received and incorporated with comments to the contractor for necessary amendments. E&S Compliance visits of the package and subsequent sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction camps before security concerns.
3.	Package 04: Rehabilitation of Canals / Distributaries Works: Lot-1: CRBC Irrigation Division DI Khan & Lot-2: CRBC Irrigation Division DI Khan	Members of LGRC have been identified and the list had been notified since August 2024 by PMO for the following schemes • Lot 1 (Dist. 4, 5 and Dera) • Lot 1 (Dist. 5, 6, 7, Mehmood and Nawab Minor) • Lot 1 (Dist. 8, 8A, 9, 10, 10A, 11, 11A & 12) • Lot 1 (Dist. 13, 14, 14A, & 15) • Lot 2 (Dist. 16, 16A, 17, 18, & 18A) • Lot 2 (Dist. 19, 20, 20A, 21, 22, & 23)

Sr. No	Package	E&S Progress
		As both Package 4 and 5 has schemes overlapping at the same location throughout, consolidated LGRCs had been constituted. EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. Consultation with XENs for verification of Land Custodianship proformas from Revenue Department. ROW confirmation for the distributaries has been completed and the list was shared with the PMO for confirmation that has been verified by revenue department for distributaries. Consolidated SDDR for package 3,4 and 5 has been submitted. SSEMP of both Lot-1 & Lot-2 has been received and comments on SSEMPs are shared with contractor for further necessary improvement. Work is currently stopped at both Lots due to current security situation.
4.	Package 05: Rehabilitation of Drains & FCCs in CRBC Irrigation Division DI Khan (Category C Project w.r.t REA, whereas Category B w.r.t. IR and IP)	Members of LGRC have been identified and the list had been notified since August 2024 by PMO for the following schemes • FCC-1 • FCC-2,3,4&5 • FCC-6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 & 19 • FCC-20, 20A, 21, 22 & 23 • FCC-24, 25, 26 & 27 • FCC-28 & 29 As both Package 4 and 5 has schemes overlapping at the same location throughout, consolidated LGRCs had been constituted. EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. Consultation with XENs for verification of Land Custodianship proformas from Revenue Department. ROW confirmation for the FCCs has been completed and the list was shared with the PMO for confirmation that has been verified by revenue department for FCCs. SDDR for

Sr. No	Package	E&S Progress
		Package 3, 4 and 5 for works within ROW has been completed and submitted. Letter of Non-compliance of SSEMP has been sent to contractor for submission of SSEMP of Package 5 Contractor has been mobilized and E&S Compliance visits of the package and subsequent sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction and camps before security concerns.
5.	Package 6: Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Nowshera (Category C Project w.r.t REA, IR and IP)	Members of LGRC have been identified and the list had been notified since August 2024 by PMO for the following schemes • Sardaryab, Reach-2, Reach-3, Reach-4) EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. Field Visit at Package 6 regarding community consultation was conducted. Consultation with XENs for verification of Land Custodianship proformas from Revenue Department which has been completed and verified from revenue department. ROW confirmation is completed from PMO and the relevant revenue department. SDDR completed and submitted to PMO and ADB. SSEMP has been received and comments on SSEMP are shared with contractor for further necessary improvement. E&S Compliance visits at active sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction and camps.
6.	Package 6A: Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Nowshera	A new Package, 6A is inducted in the portfolio related to the Rehabilitation and restoration of Protection Structures on R/S of Kabul River U/S and D/S Nowshera-Mardan Road Bridge, District Nowshera and the rehabilitation and restoration of Protection Structures on L/S of Kabul River U/S and D/S Nowshera-Mardan Road Bridge, District Nowshera Members for LGRC has been identified and shared with PMO for notification which was notified in April 2025. EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and

Sr. No	Package	E&S Progress
		bidding documents along with EMP Cost was also ensured. ROW confirmation is completed from PMO and the relevant revenue department is completed. SDDR completed and submitted which is cleared from ADB. SSEMP has been received and comments on SSEMP are shared with contractor for further necessary improvement. E&S Compliance visits at active sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction and camps.
7.	Package 7: Rehabilitation of Flood Protection Works/Structures, Malakand Irrigation Division, Swat (Category C Project w.r.t REA, IR and IP)	Members of LGRC have been identified and the list had been notified since August 2024. EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. Consultation with XENs for verification of Land Custodianship proformas from Revenue Department. Consultations with locals and a list of VLD members has been finalized and shared with the PMO. PMO verified the VLD and Custodian which were duly verified by the relevant revenue department. SDDR for this package is completed and submitted to PMO. SSEMP has been received and comments on SSEMP are shared with contractor for further necessary improvement. E&S Compliance visits of the package and its subsequent sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction camps.
8.	Package 08: Rehabilitation/ Restoration of Flood Protection Works; Lot-2 Marwat Canal Irrigation Division (Category C Project w.r.t REA, IR and IP)	LGRC for Lot 2 had been notified since August 2024 by PMO. Lot 1 is currently on hold due to security concerns. EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP cost was also ensured. The requisite data for update of VLD agreement as per the ADB comment has been shared with PMO which is in progress. This LGRC has been formed for Lot-2. Meanwhile, for Lot-1 LGRC once formed shall be

Sr. No	Package	E&S Progress
		attached with consolidated SDDR. Consolidated SDDR for package 8 Lot 2 has been updated based on ADB's comments. Telephonic consultation with XENs for verification of Land Custodianship proformas from Revenue Department which has been completed and verified from revenue department. Three revenue office verified VLDs and custodian received. SDDR for this package is completed and submitted to PMO. SSEMP has been received and comments on SSEMP are shared with contractor for further necessary improvement. E&S Compliance visits by site staff of the package and its subsequent sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction camps.
9.	Package 9: Rehabilitation of Flood Protection Structures / Drainage System in Chitral Irrigation Division	Members of LGRC have been identified and the list had been notified since August 2024 by PMO. EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. ECO DDR draft has been submitted for review after necessary amendments. Updated EMP and Project Categorization Reports of Package 09 with incorporation of findings of ECO DDR outcomes. Consultation with XENs for verification of Land Custodianship proformas from Revenue Department. Consultations with locals and a list of VLD members has been finalized and shared with the PMO. PMO verified the VLD and Custodian which were duly verified by the relevant revenue department. SDDR for this package is completed and submitted to PMO. SSEMP has been received and comments on SSEMP are shared with contractor for further necessary improvement. E&S Compliance visits by site staff of the package and its subsequent sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction camps. Additional schemes survey at Package 09 was conducted. Consultant's E&S Team visited the site for

Sr. No	Package	E&S Progress
		the purpose of filling REA, IP and IR checklists. Updated project categorization report including REA, IR and IP Checklist and findings of EDD for additional schemes under Package 09 and submitted the report to PMO.
10.	Package-11: Rehabilitation of Flood Protection Works in Charsadda Irrigation Division	Members of LGRC had been notified since August, 2024 by PMO. EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. Consultations with locals and a list of VLD members has been finalized and shared with the PMO. PMO signed the documents which has been duly verified by the relevant revenue department. Consultation with XENs for verification of Land Custodianship proformas from Revenue Department which has been completed and verified from revenue department. SDDR for this package is completed and submitted to PMO. SSEMP has been received and comments on SSEMPs are shared with the contractor for further necessary improvement. ECO DDR draft has been submitted for review after necessary amendments. Updated EMP and Project Categorization Reports of Package 11 with incorporation of findings of ECO DDR outcomes. Additional schemes survey at Package 11 was conducted. Consultant's E&S Team visited the site for the purpose of filling REA, IP and IR checklists. Updated project categorization report including REA, IR and IP Checklist and findings of EDD for additional schemes under Package 11 and submitted the report to PMO. E&S Compliance visits of the package and subsequent sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction camps.
11.	Package-12: Repair and Rehabilitation of Flood Protection Structures, Peshawar. Peshawar Irrigation Division	Members of LGRC had been notified since August, 2024 by PMO. EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. Consultation with XEN for verification of Land Custodianship proformas from Revenue Department.

Sr. No	Package	E&S Progress
		Consultations with locals and a list of VLD members has been finalized and shared with the PMO. PMO has signed the documents which has been verified from the relevant revenue department. SDDR for this package is completed and submitted to PMO. SSEMP has been received and comments on SSEMPs are shared with the contractor for further necessary improvement. E&S Compliance visits of the package and subsequent sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction camps.
12.	Package 13: Repair and Rehabilitation of Flood Protection Structures, Swat. Swat Irrigation Division-II & I (Category C Project w.r.t REA, IR and IP)	Members of LGRCs had been notified since August, 2024 by PMO for: • Scheme- 1 (Fatehpur, Shin, Farahatabad, Koza Asala, Dakorak, Chaharbagh and Chalyar) • Scheme- 2 (Kalakot, Jalala Asharay, Bara Drushkhela, Koza Drushkhela, Bara Bamakhela 1 and 2, Koza Bamakhela, Bodigram, Biadara). EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. Consultation with XENs for verification of Land Custodianship proformas from Revenue Department which has been completed and verified from revenue department. Consultations with locals and a list of VLD members has been finalized and shared with the PMO. PMO has signed the documents which has been verified from the relevant revenue department. Working on consolidated SDDR (Pkg 13 & 14) is completed. SDDR for this package is submitted to PMO. ECO DDR draft has been submitted for review after necessary amendments. Updated EMP and Project Categorization Reports of Package 13 with incorporation of findings of ECO DDR outcomes. SSEMP has been received and comments on SSEMP were shared with the contractor for further necessary improvement. Additional schemes survey at Package 13 was conducted. Consultant's E&S Team visited the site for

Sr. No	Package	E&S Progress
		the purpose of filling REA, IP and IR checklists. Updated project categorization report including REA, IR and IP Checklist and findings of EDD for additional schemes under Package 13 and submitted the report to PMO. E&S Compliance visits of the package and subsequent sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction camps.
13.	Package 14: Repair and Rehabilitation of Flood Protection Structures, Swat. Swat Irrigation Division-II & I (Category C Project w.r.t REA, IR and IP)	Members of LGRC had been notified since August, 2024 by PMO EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. Consultation with XENs for verification of Land Custodianship proformas from Revenue which has been completed and verified from revenue department. Consultations with locals and a list of VLD members has been finalized and shared with the PMO. PMO has signed the documents which has been verified from the relevant revenue department. Working on consolidated SDDR (Pkg 13 & 14) is completed. SDDR for this package is submitted to PMO. ECO DDR draft has been submitted for review after necessary amendments. Updated EMP and Project Categorization Reports of Package 14 with incorporation of findings of ECO DDR outcomes. SSEMP has been reviewed and shared with comments for further necessary changes. Additional schemes survey at Package 14 was conducted. Consultant's E&S Team visited the site for the purpose of filling REA, IP and IR checklists. Updated project categorization report including REA, IR and IP Checklist and findings of EDD for additional schemes under Package 14 and submitted the report to PMO. E&S Compliance visits of the package and subsequent sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction camps.
14.	Package 15: Repair and Rehabilitation of Munda Headwork's Bridge	Members of LGRC have been notified by PMO for Munda Head Works EMP and SDDR have been finalized based on the comments of ADB and submitted to PMO. EMP and

Sr. No	Package	E&S Progress
		SDDR incorporation in design and bidding documents along with EMP Cost was also ensured. SSEMP has been received and comments on SSEMPs are shared with the contractor for further necessary improvement.
15.	Package 16: Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Dir Irrigation Division (Category C Project w.r.t REA, IR and IP)	Members of LGRC had been notified since August, 2024 by PMO EMP has been finalized based on the comments of ADB and submitted to PMO. EMP incorporation in design and bidding documents along with EMP Cost was also ensured. Consultation with XENs for verification of Land Custodianship proformas from Revenue Department. Verification of Land Custodianship proformas from Revenue Department is completed. Consolidated SDDR (Pkg 2 and 16) is completed and submitted to PMO. SSEMP has been received and comments on SSEMP has been shared with contractor for further necessary improvement E&S Compliance visits of the package and subsequent sites were conducted and the contractor was advised to ensure all necessary arrangements on site, construction camps.

2.5 Description of Any Changes to Project Design

40. Scope of work for the four packages i.e., Package 9, 12, 13 and 14 was increased. However, Lot-I of the package 8 is suspended from the proposed project. No change in design is reported.

2.6 Description of Any Changes to Agreed Construction methods

41. No change to agreed construction methods has been made during the reporting period.

3 ENVIRONMENTAL SAFEGUARD ACTIVITIES

3.1 General Description of Environmental Safeguard Activities

42. During the reporting period, the environmental and social specialists from the PMC consultants were mobilized to plan the priority tasks, team deployment plan and the future course of action for the screening and categorization of sub-projects/packages, and preparation of E&S documents in compliance with approved ESMF and ADB SPS-2009. Project-related secondary data, including the feasibility report, PC-1, etc., were collected and reviewed. Meetings were held with the design team, the client, and ADB to discuss and understand the scope and nature of the work. The E&S specialist of PMC visited the sites of retroactive and repair & rehabilitation works throughout the province and prepared the following E&S safeguard documents for each sub-project.
- Project Categorization Brief Report;
 - Rapid Environmental Assessment (REA) Checklist;
 - Involuntary Resettlement (IR) Checklist;
 - Indigenous People (IP) Checklist;
 - Environmental Management Plan (EMP);
 - Ecological Due Diligence Report (Eco-DDR);
 - Social Due Diligence Report (SDDR);
 - E&S input for Design Report and Tender Documents;
 - EMP input for BOQs; and
 - EMP Cost and Budget for Feasibility/Design Report.
43. The status of these safeguards are shown in **Table 6**.

Table 6: Package Wise Status of E&S Safeguard Documents

Sr. No.	Package No.	Environmental Categorization		Ecological DDR	EMP Status	Design Input, BOQs, Costing and Input in Tender
1.	EFAP/KPID-CW-02	REA	√	NA	√	√
2.	EFAP/KPID-CW-03	REA	√	NA	√	√
3.	EFAP/KPID-CW-04(Lot-1)	REA	√	NA	√	√
4.	EFAP/KPID-CW-04(Lot-2)	REA	√	NA	√	√
5.	EFAP/KPID-CW-05	REA	√	NA	√	√
6.	EFAP/KPID-CW-06	REA	√	NA	√	√
7.	EFAP/KPID-CW-06A	REA	√	NA	√	√
8.	EFAP/KPID-CW-07	REA	√	NA	√	√
9.	EFAP/KPID-CW-08(Lot-1)	REA	√	NA	√	√
10.	EFAP/KPID-CW-08(Lot-2)	REA	√	NA	√	√
11.	EFAP/KPID-CW-9	REA	√	√	√	√
12.	EFAP/KPID-CW-9 (Additional Work)	REA	√	Same as previous	√	√
13.	EFAP/KPID-CW-11	REA	√	√	√	√
14.	EFAP/KPID-CW-12	REA	√	NA	√	√
15.	EFAP/KPID-CW-12 (Additional Work)	REA	√	Same as previous	√	√
16.	EFAP/KPID-CW-13	REA	√	√	√	√

Sr. No.	Package No.	Environmental Categorization		Ecological DDR	EMP Status	Design Input, BOQs, Costing and Input in Tender
17.	EFAP/KPID-CW-13 (Additional Work)	REA	√	Same as previous	√	√
18.	EFAP/KPID-CW-14	REA	√	√	√	√
19.	EFAP/KPID-CW-14 (Additional Work)	REA	√	Same as previous	√	√
20.	EFAP/KPID-CW-15	REA	√	NA	√	√
21.	EFAP/KPID-CW-16	REA	√	NA	√	√

3.2 ADB and KP-EPA Requirements

44. The Environmental Safeguards documentation as per the Section 3.1 has been prepared for various packages under EFAP based on ADB SPS-2009 and ESMF. The status of these instruments is provided in Section 2.4.3 of this report. Furthermore, a formal communication (through telecom and letter) has been initiated with KP-EPA for the local requirements as per the applicable laws and regulations of KP-EPA.
45. A formal communication (through telecom and letter) was initiated with KP-EPA for the local requirements as per the applicable laws and regulations of KP-EPA. During the meeting with KP-EPA, the whole EFAP project was discussed in detailed in the presence of PMO. It was discussed that the proposed is merely related to rehabilitation and repair of bridge, drains, canals and flood protection works. Majorly works are confined within existing Right of Way (RoW) of Irrigation department and there is no protected and notified cultural, forest and wildlife sites within or immediate vicinity of the project area. The proposed project does not fall in any of the Categories mentioned under Schedule-II, III and IV of The Khyber Pakhtunkhwa Environmental Assessment Rules, 2021 and it is envisaged that no Environmental Assessment is required. Keeping in view the project scope and anticipated impacts, KP-EPA communicated their observation through letter No. EPA/EIA/General/25/632-33 dated 17-02-2025. KP-EPA recommended to ensure the compliance with environmental best practices and regular close coordination with KP-EPA further environmental coinsurance during implantation. The response letter from KP-EPA is attached as **Annex-III**.

3.3 Site Audits/Inspections

46. Frequent site visits regarding environmental compliance were conducted and checklists along with sample checklist is attached in **Annex IV**.
47. The E&S compliance activities were carried out in July 2025 at all the active site of Peshawar, Nowshera, Charssadda, Swat, Dir, DI Khan, Malakand and Chitral where the contractor has been mobilized and working was in progress.
48. In December 2025, site visits of EFAP were also conducted for package 6, 6a, 7, 11, 12, 13, 14 and 16. The site visit included the E&S and OHS compliance at site and gender consultation with the locals. The field visit was conducted in two phases. In first phase package 6, 6a, 11 and 12 were visited for compliance and gender consultations while in second phase package 7, 13, 14 and 16 were visited.
49. Package wise pictorial evidences related to E&S compliance are provided in Photo logs.
50. Following are the major insights of E&S Compliance Visits,
 - All sites were easily accessible without disturbance to local community.
 - Both Surface and Drinking Water sources were in good conditions and there is no direct pollution source.
 - No tree cutting is involved in any site of the packages.
 - No damage to nearby assets (crops) and other community facility was observed / reported.

- No accident / incident (work related and community related) reported due to the project activities.
51. Following are the major non-compliances observed at site,
- Negligence was observed regarding use of PPEs by workers.
 - Unsatisfactory housekeeping was observed at construction site.
 - Handling and storage of construction material and waste was unsatisfactory.
 - Site rest areas provided to labors were inadequate and lack of basic amenities.
 - Construction Machinery in most of the cases was away from the local community thus no noise impacts were recorded however there is an impact on site workers.
 - Frequent OHS trainings / Tool box talks to workers related to routine works are advised to contractor as per EMP.
 - Hiring of EHS staff at the earliest along with submission of SSEMP as per agreement.
52. Letters has been written to all the contractors for non-compliances in start of the September, 2025 and October 2025 in which all contractors were directed to fulfil the requirements for implementation of E&S at site. Keeping in view the Contractual, Legal and ADB's requirement and seriousness of the matter, the Contractors are advised to prepare and implement SSEMP in true spirit.
53. LGRC meetings were held with the members for Package 6, 11, 12, 13, 14, 7, 2, & 16. It is observed that specific female LGRCs need to be added in overall GRM structure

3.4 Issues Tracking

54. Following are the major issues for which contractors were advised to resolve these non-compliances on urgent basis.
- Availability of SSEMP at site and Implementation of SSEMP
 - Provision of E&S Specialist at site
 - Provision of Mandatory PPEs to Workers at site and subsequent compliance by the workers
 - Availability of lifesaving equipment for works near water channels/rivers
 - HSE Information and Signage's (Safety signing, site barricading and local awareness must be ensured)
 - Provision of basic welfare facilities to workers
 - Mandatory worker and staff trainings
 - Monthly Contractor's E&S Reporting

The package wise specific issues were mentioned in Table 4 above.

3.5 Unanticipated Environmental Impacts or Risks

55. Based on the site surveys and review of available data/information, the repair and rehabilitation works of the damaged water channel, canals, drains and few flood protection wall are being carried out within the existing ROW which were damaged due to flood. However, other works especially related to flood protection walls involves the private land for which locals agreed to donate their land for these works. In this regards, Voluntarily Land Donation (VLD) agreement were held with land owners mainly in Swat, Malakand, Lower Dir, Charsadda & Chitral. There are no indigenous people in the sub-Project area. As the activities involve the restoration of banks around the water channels/carriers disties at the breached areas due to recent floods, therefore, there are no adverse impacts of acquisition, assets displacement and loss of Livelihood. The proposed project has no significant impact on flora and fauna. Some of the minimal impacts like occupational health and safety concerns, air and noise disturbance, and child labor, are anticipated which has been assessed for each package during the preparation of E&S documents accordingly. Occupation health and safety concerns are dealt with ensuring PPE for workers, toolbox trainings, workplace safety inspections, incident reporting systems and safety signage. Moreover, proper dust control measures are ensured to tackle air pollution and well managed and well-conditioned construction equipment is used that complies with noise parameters. Moreover the impact of flooding during the monsoon season especially working near the river area is to be considered with special attention and the cooperation with local administration in this regard will be mandatory.

4 RESULTS OF ENVIRONMENTAL MONITORING

4.1 Overview of Monitoring Conducted during Current Period

57. Regular compliance monitoring visits has been scheduled during the construction phase of project. Contractor was advised to strictly follow the monitoring practices as per the contract agreement and EMP of each project package.

4.2 Summary of Monitoring Outcomes

58. It was advised to contractor that the availability of Environmental & Social (E&S) specialist at site is necessary to ensure compliance which is currently not in practice in some packages/sites. Key areas of focus include effective resource utilization and waste management, clear accessibility to construction sites, clean drinking water for both workers and visitors and good housekeeping as per the best practices at work and accommodation areas. These aspects require more attention and strict compliance from contractor's end.
59. No major issues have been reported at sites regarding the tree cutting and its impact on fauna, livelihood loss, occupational and community health and safety, as well as air and noise pollution, and water contamination at the sites. However, continuous monitoring of these aspects is done through site visits and E&S checklists that are attached in **Annex VII** on regular basis as per the monitoring plan suggested in EMP is implemented.
60. Special considerations are required towards local cultural and social norms, gender-based violence (GBV) and child labor, through worker code of conduct and maintaining a grievance redress mechanism to address complaints. This aspect has been communicated to the contractor and advised to ensure that proper training is provided to all workers to uphold these issues as per the requirements. No complaint has been received from workers or community members in the reporting period. However, the GRM has been notified for all packages but the record keeping and training of workers and community members is not properly complied by the Contractors.

4.3 Waste Management

61. Waste produced during construction activities at sites and domestic waste produced at labour accommodation camps is managed properly. Although the amount and type of waste generated varies according to local circumstances but its management was ensured in consultation with local irrigation department officials and district administration. Details of Waste produced is attached in the **Annex V**.

4.4 Material Resources Utilization

62. The project involves rehabilitation and restoration of flood protection works and lining of canal and disties. Major material used in this project are mainly boulders along with gabion wire for the construction of gabion wall, and plum concrete instead of the earlier for the construction of flood protection walls. Detail of construction material is attached in **Annex VI**.

4.5 Health and Safety

4.5.1 Community Health and Safety

63. No significant issues regarding community's health and safety as the project scope of work is minimum in this scenario. Whereas as due care is given to this matter in SSEMP that includes aspects like GRM, GBV and child labor, through worker's code of conduct.

4.5.2 Worker Safety and Health

64. No significant issues regarding worker's health and safety has been reported in this period, whereas, at some sites negligence regarding PPEs had been observed and contractor was advised to ensure the provision of mandatory PPEs at site. Some images are shared in Photologs.

4.6 Training

65. Contractors are conducting the informal trainings of the workers on regular basis but record is not properly maintained at site or offices of the Contractors.
66. Site Staff of supervision consultant also conducted various trainings and awareness sessions for the workers as well as community members during their visits. Moreover, E&S Staff of supervision consultants arranged an online training session in September 2025 and joint ADB-PMO-PMC progress review session in October 2025. Following aspects were discussed with the all the contractors:
- Introduction and E&S Requirements
 - E&S Challenges during Construction Activities
 - Findings of E&S Compliance Visits
 - Status of SSEMP's
 - Guidance for SSEMP and Risk Assessment
 - Environmental Monitoring Requirements
 - E&S Progress Reports
 - Contractor E&S Obligations
 - Non-Compliance Report

5 FUNCTIONING OF THE SITE SPECIFIC ENVIRONMENTAL MANAGEMENT PLAN (SSEMP)

5.1 SSEMP Review

67. Since at the project start and design stage, it was anticipated that category of packages may change. Keeping in view EMPs were prepared for each package and in line with these EMPs, requirement of SSEMP for each package was suggested and included in contractor's construction agreement for implementation of E&S measures at site during execution of work. As per the contract agreement and EMP of each project package, contractor was advised to prepare and submit the SSEMP for their works. Table below represents the status of SSEMP of all the packages.

Table 7: Package Wise Status of SSEMP

Package	Introductory Meeting With Contractors for SSEMP	Second Online Session for Contractor	ADB, PMO, DSC and Contractor Online Session for E&S	Status of SSEMP
Package 02	--	Online September 10, 2025	Online October 21, 2025	--
Package 03	Online - April 2024	Online September 10, 2025	Online October 21, 2025	Prepared and Functional Finalization is in Progress
Package 04	Online - April 2024	Online September 10, 2025	Online October 21, 2025	Prepared and Functional Finalization is in Progress
Package 05	--	Online September 10, 2025	Online October 21, 2025	--
Package 06	--	Online September 10, 2025	Online October 21, 2025	Prepared and Functional
Package 6A	--	Online September 10, 2025	Online October 21, 2025	Prepared and Functional Finalization is in Progress
Package 07	Online - April 2024	Online September 10, 2025	Online October 21, 2025	Prepared and Functional Finalization is in Progress
Package 08	Online - April 2024	Online September 10, 2025	Online October 21, 2025	Prepared and Functional
Package 09	Online - April 2024	Online September 10, 2025	Online October 21, 2025	Prepared and Functional Finalization is in Progress
Package-11	Online - April 2024	Online September 10, 2025	Online October 21, 2025	Prepared and Functional Finalization is in Progress
Package-12	Online - April 2024	Online September 10, 2025	Online October 21, 2025	Prepared and Functional Finalization is in Progress
Package 13	Online - April 2024	Online September 10, 2025	Online October 21, 2025	Prepared and Functional
Package 14	Online - April 2024	Online September 10, 2025	Online October 21, 2025	Prepared and Functional

Package	Introductory Meeting With Contractors for SEMP	Second Online Session for Contractor	ADB, PMO, DSC and Contractor Online Session for E&S	Status of SEMP
Package 15	Online - April 2024	--	--	Finalized and Approved
Package 16	Online - April 2024	Online September 10, 2025	Online October 21, 2025	Prepared and Functional Finalization is in Progress

6 GOOD PRACTICE AND OPPORTUNITY FOR IMPROVEMENT

6.1 Good Practice

68. The following key good practices are identified that must be implemented in order to achieve improvements.

- Good Housekeeping
- Waste Management
- Worker and Community Health and Safety
- Provision of PPEs to each worker at site
- Safe and clean drinking water
- Ensure no damage to trees, plants and other floral species
- Prohibition of direct discharges to water bodies and open soil
- Respect local religious and cultural norms
- Training of workers at site
- Worker Code of Conduct

6.2 Opportunities for Improvement

69. More trainings on GRM, Worker Code of Conduct, SSEMP, OHS, waste management are planned to schedule for overall enhancement in environmental and social aspect of the project.

7 GRIEVANCE REDRESS MECHANISM (GRM)

70. A GRM is established to address any complaints or grievances arising during the implementation period of each sub-projects. Project affectees or community members of the project area may perceive risks to themselves or their property or their legal rights or have concerns about the possible environmental and social impact that a project may have. Any concerns or grievances will be addressed quickly and transparently, and without retribution to the project affectees or community members or complainant.
71. The primary principle of GRM is that all complaints or grievances are resolved as quickly as possible in a fair and transparent manner.

7.1 Objectives

72. The objectives of the GRM are to:
- develop an organizational framework to address and resolve the grievances of individual(s) or community(s), fairly and equitably;
 - provide enhanced level of satisfaction to the aggrieved;
 - provide easy accessibility to the aggrieved/affected individual or community for immediate grievance redress;
 - ensure that the targeted communities and individuals are treated fairly at all times;
 - identify systemic flaws in the operational functions of the project and suggest corrective measures; and
 - ensure sustainability of the project.

7.2 Type of Complaints

73. The major complaints that may arise during the execution of the proposed project at site include but not limited to:
- E&S issues (dust, noise, air pollution, social and cultural issues);
 - Damage and blockage of public utilities including irrigation infrastructure;
 - Traffic inconvenience;
 - Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH);
 - Resettlement issues including loss of livelihood; and
 - Issues related to compensation of resettlement impacts.

7.3 Disclosure of GRM

74. The GRM shall be disclosed at PMO, Irrigation Department Khyber Pakhtunkhwa, proposed project and sub-project offices and website as well.

7.4 Structure of Grievance Redress Mechanisms

75. The project will establish a three-tier GRM comprising Community GRC, sub-project GRC; and PMO-GRC. These tiers are described below.

7.4.1 Local GRC (Tier-1)

76. The Local-GRC (LGRC) provides a platform for project affectees or community members to raise and discuss their concerns, resolve the E&S issues at the community level and coordinate with project management to communicate these issues and concerns. LGRC has been established to maintain a close rapport and coordination with affected persons and community members throughout the project implementation. The LGRC comprises at least four male members (one as the committee convener), two female members, one representative from SC and one from KPID. Based on the scope of each package almost 16 LGRCs has been identified for 9 packages during this reporting period for which notification is currently in process. The identification of members for other packages is in progress.
77. Status of LGRC of all the packages is listed below.

Table 8: Package Wise Status of LGRCs

Sr. No.	Package No.	Package Name	Numbers	Status of LGRC
1.	EFAP/KPID-CW-02	Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Dir Irrigation Division	02	Notified
2.	EFAP/KPID-CW-03	Repair and Rehabilitation of Canals and Drains, Paharphur Irrigation Division	05	Notified
3.	EFAP/KPID-CW-04(Lot-1)	Rehabilitation of Canals / Dis-tributaries Works: Lot-1: CRBC Irrigation Division DI Khan	06	Notified
4.	EFAP/KPID-CW-04(Lot-2)	Rehabilitation of Canals / Dis-tributaries Works: Lot-2: CRBC Irrigation Division DI Khan		
5.	EFAP/KPID-CW-05	Rehabilitation of Drains & FCCs in CRBC Irrigation Division DI Khan	06	Notified
6.	EFAP/KPID-CW-06	Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Nowshera	01	Notified
7.	EFAP/KPID-CW-06A	Rehabilitation and Restoration of Protection Structures of R/S of Kabul River U/S and D/S Nowshera-Mardan Road Bridge, District Nowshera	01	Notified
8.	EFAP/KPID-CW-07	Repair and Rehabilitation of and Flood Protection Structures, Swat. Malakand Irrigation Division	01	Notified
9.	EFAP/KPID-CW-08(Lot-1)	Rehabilitation/ Restoration of Flood Protection Works in Lot-1: Bannu Irrigation Division	01	Notified
10.	EFAP/KPID-CW-08(Lot-2)	Rehabilitation/ Restoration of Flood Protection Works in Lot-2 Marwat Canal Irrigation Division	01	Notified
11.	EFAP/KPID-CW-9	Rehabilitation of Flood Protection Structures / Drainage System in Chitral Irrigation Division	01	Notified
12.	EFAP/KPID-CW-11	Rehabilitation of Flood Protection Works in Charsadda Irrigation Division	01	Notified

Sr. No.	Package No.	Package Name	Numbers	Status of LGRC
13.	EFAP/KPID-CW-12	Repair and Rehabilitation of and Flood Protection Structures, Peshawar. Peshawar Irrigation Division	01	Notified
14.	EFAP/KPID-CW-13	Repair and Rehabilitation of and Flood Protection Structures, Swat. Swat Irrigation Division-II	02	Notified
15.	EFAP/KPID-CW-14	Repair and Rehabilitation of and Flood Protection Structures, Swat. Swat Irrigation Division-I	01	Notified
16.	EFAP/KPID-CW-15	Restoration of Three Spans of RCC bridge at Munda Head Works (Doaba canal system)	01	Notified
17.	EFAP/KPID-CW-16	Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Dir Irrigation Division	02	Notified

7.4.2 Female Local GRC (Tier-1)

79. Apart from the above, female LGRCs has been notified in this reporting period (July to December 2025) to ensure the resolution of female based grievances at community level. Overall 06 Female LGRCs have been notified as below.

Table 9: Package Wise Status of Female LGRCs

Sr. No.	Package No.	Package Name	Numbers	Status of LGRC
1.	EFAP/KPID-02	Rehabilitation of Flood Protection Works/Structures, Dir Irrigation Division	01	Notified
2.	EFAP/KPID-09	Rehabilitation of Flood Protection Works /Structures /Drainage System in Chitral Irrigation Division		
3.	EFAP/KPID-16	Rehabilitation of Irrigation Systems, Dir Irrigation Division		
4.	EFAP/KPID-03	Rehabilitation of Canals and Drains, Paharpur Irrigation Division	01	Notified
5.	EFAP/KPID-04	Rehabilitation of Canals / Distributaries Works: Lot-1 & 2: CRBC Irrigation Division DI Khan	01	Notified
6.	EFAP/KPID-05	Rehabilitation of Drains & FCCs in CRBC Irrigation Division DI Khan		
7.	EFAP/KPID-06 (including 6A)	Rehabilitation of Flood Protection Works/Structures in District Nowshera, Peshawar Canals Division	01	Notified
8.	EFAP/KPID-11	Rehabilitation/Restoration of Flood Protection Works/Structures in Charsadda Irrigation Division	01	Notified
9.	EFAP/KPID-12	Rehabilitation of Flood Protection Works/Structures in District Peshawar. Peshawar Irrigation Division		
10.	EFAP/KPID-13	Rehabilitation of Flood Protection Structures, Swat Irrigation Division-II	01	Notified
11.	EFAP/KPID-14	Rehabilitation of Flood Protection Structures, Swat Irrigation Division-I		

Sr. No.	Package No.	Package Name	Numbers	Status of LGRC
12.	EFAP/KPID-07	Rehabilitation of Flood Protection Works/Structures , Malakand Irrigation Division		

81. The sub-project E&S staff will coordinate with community-GRC to review and resolve the E&S issue or concern preferably within five (05) working days from receipt of the grievance. Any complaints that cannot be resolved at community-GRC will be forwarded to the next tier.

7.4.3 Sub-Project GRC (Tier-2)

82. PMO has constituted a GRC headed by concerned Project Manager (PM) at each sub-project site to resolve all grievances and complaints of the project affectees or community members received either directly or through the Tier-1. Sub-project GRC comprises of the following members:
- Project Manager (PM), as head/convener of sub-project GRC;
 - Director Social & Environment and Gender Specialist of PMO;
 - E&S specialists of Supervision Consultant (SC)
 - Resident Engineer of SC;
 - A representative (E&S specialist) of contractor (if required); and
 - A representative of local community (convener of Tier-1).
83. Representative from any other district government department may be called as and when required by the sub-project GRC.
84. Sub-project GRC will meet once a month and when the need arises. The sub-project GRC will review grievances involving all E&S issues that may arise due to project implementation. Sub-project GRC will perform the following functions:
- Record, categorize and prioritize the grievances that need to be resolved by the committee and resolve them within ten (10) working days;
 - Invite and hear aggrieved persons/parties to produce evidence of their claims and record their view point;
 - Communicate its decisions and recommendations on all resolved issues to PMO and the aggrieved persons for smooth implementation;
 - Forward the unresolved cases/ complaints to PMO-GRC within an appropriate time frame with reasons recorded and its recommendations;
 - Develop an information dissemination system and acknowledge the aggrieved persons/parties about the development regarding their grievance;
 - Maintain a complaint register accessible to the project affectees or community members with brief information about complaints and sub-project GRC decision with status report; and,

- Maintain complete record of all complaints received by the sub-project GRC with actions taken.

85. Any complaint that cannot be resolved by the sub-project GRC, will be forwarded to the next tier – the PMO-GRC.

7.4.4 PMO-GRC (Tier-3)

86. The GRM aims to mediate conflicts and response to complaints related to environment and social performance of the project. GRM also provide a forum to general public/community who might believe that they are adversely affected by the ADB financed project. The PMO has established a Grievance Redress Committee (GRC) at project level as well with the following composition:

- Director Social & Environment PMO (Chairman/Chairperson)
- Deputy Project Director PMO (Member & Focal person)
- Deputy Director Civil of PMO (Member)
- Deputy Director Environment PMO (Member)
- Tehsil Nazim, (concerned Tehsil) (Member)
- Representatives of DC Swabi Office (Member)
- Deputy Collector PMO (Member)

87. Representative from any other district government department may be called as and when required by the PMO-GRC.

88. The PMO-GRC through the authorized representative, will acknowledge the complainant about his/her complaint, scrutinize the record, investigate the remedies available and request the complainant to produce any record in favor of his/her claim. After thorough review and scrutiny of the available record on the complaint, field visit will be conducted to collect additional information, if required. Once the investigations are completed, the PMO-GRC will give decision within twenty (20) working days of receipt of the complaint. If the complainant is still dissatisfied with the decision, he/she can go to the court of law, if he/she wishes so. Organization of the GRC is shown in **Figure 5**.

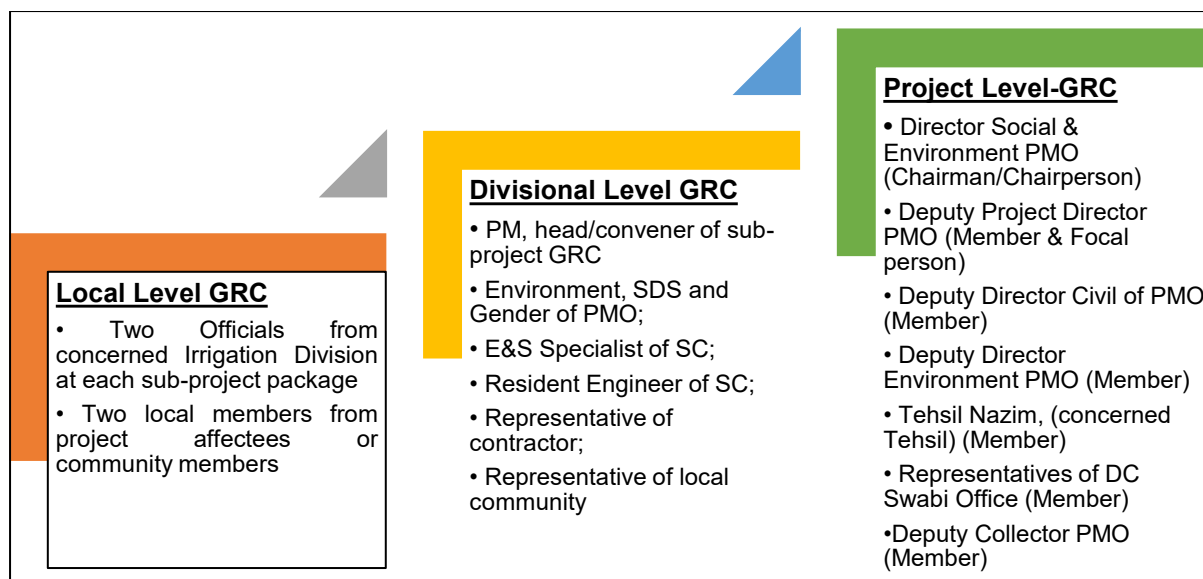


Figure 5: Organogram of GRC

7.5 Functioning of GRM

89. The GRM system is functional at all level as mentioned above. All local GRC (Tier 1) as well as female LGRCs are functional. No major grievance was recorded in this period of July to December 2025. However, minor grievances related to dusty access road, waste generated due to clearance of debris and noisy equipment were received informally by local community and redress at site level through good housekeeping measures, waste disposal, timely restoration and sprinkling.

90. Working on a grievance³ received in 2024 by local community at Package 9 was in progress. Stakeholder engagement and consultations were carried out in this period to redress the grievance and resolved after an agreement signing between the parties for the removal of debris from confluence point of Ayun and Chitral River.

³ Grievance related to removal of debris from confluence of Ayun and Chitral River. Agreement on the removal of debris was made in September 2025 as additional work in Package 9.

8 CONCLUSION AND RECOMMENDATIONS

8.1 Conclusion

91. The design phase of most of the project packages has been completed and contractor has been mobilized at few packages of the proposed project. Field visits for E&S safeguard documents has been completed and following project documents/inputs has been prepared for each package.

- Project Categorization Brief Report;
- Rapid Environmental Assessment (REA) Checklist;
- Involuntary Resettlement (IR) Checklist;
- Indigenous People (IP) Checklist;
- Environmental Management Plan (EMP);
- Ecological Due Diligence Report (Eco-DDR)
- E&S input for Design Report and Tender Documents;
- EMP input for BOQs; and
- EMP Cost and Budget for Feasibility/Design Report.

92. Apart from the above, E&S Compliance visit, contractor SSEMP training, Land Identification and RoW confirmation processing along with VLD agreement, are in progress during the 3rd and 4th quarter of 2025. The identification of members for female LGRCs has been completed for almost all packages during this reporting period. The E&S team of SC observed the major non-compliance with respect to the availability of Site E&S staff from contractor which was communicated and advised to comply on urgent basis to ensure the proper implementation of E&S requirements as per the ADB SPS and EMP. Furthermore, as per the E&S compliance at active work site, no major E&S issues has been reported at site. However, contractor was advised to ensure the proper implementation of E&S measures as suggested in EMP and monitored accordingly for compliance.

8.2 Recommendation

93. It is recommended that the suggested good practices and opportunities as mentioned in Section 6 will be implemented at site during the upcoming quarters of 2026.

ANNEXURES

ANNEXURE I: SUMMARY OF RETROACTIVE SCHEMES

Sr. No.	Name of Work	Circle	Division	Estimated Cost PKR Million
1.	Restoration of Disties/ Minors in Shor Kot Section	DI Khan Circle	CRBC Irrigation Division	22
2.	Restoration of Disties/ Minors in Gomal Section	DI Khan Circle	CRBC Irrigation Division	18
3.	Restoration of Disties/ Minors in Fateh Section	DI Khan Circle	CRBC Irrigation Division	10
4.	Restoration of Disties/ Minors in Naivela Section.	DI Khan Circle	CRBC Irrigation Division	25
5.	Restoration of Disties/ Minors in Ramak Section.	DI Khan Circle	CRBC Irrigation Division	30
6.	Restoration of Disties/ Minors in Mahara Section	DI Khan Circle	CRBC Irrigation Division	30
7.	Emergent Restoration of damaged flood bank of Hazara Drain FCC-23, Gudh Nullah) Village Hazara Pakka DI Khan	DI Khan Circle	CRBC Irrigation Division	3
8.	Restoration of Balambat Irrigation Scheme in District Dir Lower.	Swat Irrigation Circle	Dir Irrigation Division	43
9.	Restoration of Badwan Irrigation Scheme in Adenzai area District Dir Lower.	Swat Irrigation Circle	Dir Irrigation Division	37
10.	Restoration of Gandigar, Darora and Ganorai Irrigation Schemes in District Dir Upper.	Swat Irrigation Circle	Dir Irrigation Division	39
11.	Restoration of Flood Protection Works Along Panjkora River from Kumrat to Chokyatan and its Tributaries in District Dir Upper.	Swat Irrigation Circle	Dir Irrigation Division	60
12.	Restoration of Flood Protection Works Along Panjkora River from adai to Odigram in District Dir Lower.	Swat Irrigation Circle	Dir Irrigation Division	60
13.	Restoration of Flood Protection Works Along Panjkora River from Odigram to Shago kass in District Dir Lower.	Swat Irrigation Circle	Dir Irrigation Division	40
14.	Restoration/Rehabilitation of Flood Protection Works along Right Side Swat Goragat to RCC Bridge of Chakdara in Adenzai Area District Dir Lower.	Swat Irrigation Circle	Dir Irrigation Division	50
15.	Restoration of Shamizai & Barwai Irrigation Schemes and its allied infrastructure in Tehsil Matta District Swat.	Swat Irrigation Circle	Swat Irrigation Division-II	79
16.	Restoration / Rehabilitation of flood protection works/ Armoured Bund on left bank of Swat River from Chakdara Bridge to AT works.	Mardan Irrigation Circle	Malakand Irrigation Division	100
17.	Emergency restoration to 36 KM long damaged flood protection works on left bank of Kabul River at critical reaches including Drains in District Charsadda / Nowshera	Peshawar Irrigation Circle	Charsadda Irrigation Division	114.08

Sr. No.	Name of Work	Circle	Division	Estimated Cost PKR Million
18.	Restoration to damaged flood protection works on left bank of Adezai River including drains in Sahabqadar area.	Peshawar Irrigation Circle	Charsadda Irrigation Division	56.602
19.	Temporary/Emergency Restoration of irrigation Supplies from Munda Head Works to Lower Swat Canal System and tangi Lift Irrigation Scheme i/c intake structures District Charsadda.	Peshawar Irrigation Circle	Charsadda Irrigation Division	300
20.	Restoration of Irrigation Supplies in Doaba Canal System including intake structures and Civil Channels in Shabqadar Area	Peshawar Irrigation Circle	Charsadda Irrigation Division	115

ANNEXURE II: SUMMARY OF SUB-PROJECT PACKAGES

Sr. No	Package / Scheme	Description	District	Cost (Million \$)	E&S Category w.r.t REA,
1.	EFAP/KPID-CW-01	Rehabilitation of Munda Head Works & Doaba Canal System	Charsadda	8.18	Dropped
2.	EFAP/KPID-CW-02	Rehabilitation of Flood Protection Works/Structures, Dir Irrigation Division	Dir	1.32	C
3.	EFAP/KPID-CW-03	Rehabilitation of Canals and Drains, Paharpur Irrigation Division	DI Khan	2.43	C
4.	EFAP/KPID-CW-04	Rehabilitation of Canals / Dis-tributaries Works: Lot-1 & 2: CRBC Irrigation Division DI Khan	DI Khan	3.43	C
5.	EFAP/KPID-CW-05	Rehabilitation of Drains & FCCs in CRBC Irrigation Division DI Khan	DI Khan	7.02	C
6.	EFAP/KPID-CW-06	Rehabilitation of Flood Protection Works/Structures in District Nowshera, Peshawar Canals Division	Nowshera	6.24	C
7.	EFAP/KPID-CW-06A	Rehabilitation of Flood Protection Works/Structures in District Nowshera, Peshawar Canals Division	Nowshera	3.20	C
8.	EFAP/KPID-CW-07	Rehabilitation of Flood Protection Works/Structures , Malakand Irrigation Division	Swat	3.97	C
9.	EFAP/KPID-CW-08	Restoration/Rehabilitation of Flood Protection Works Lot- 2: Marwat Canal Irrigation Division	Bannu	0.32	C
10.	EFAP/KPID-CW-09	Rehabilitation of Flood Protection Works/Structures /Drainage System in Chitral Irrigation Division	Chitral	1.08	C

Sr. No	Package / Scheme	Description	District	Cost (Million \$)	E&S Category w.r.t REA,
11.	EFAP/KPID-CW-09 (Additional Works)	Rehabilitation of Flood Protection Works/Structures /Drainage System in Chitral Irrigation Division	Chitral	--	C
12.	EFAP/KPID-CW-10	Rehabilitation/Restoration of Irrigation Systems and Flood Protection Works/Structures, Mansehra & Hazara Irrigation Divisions	Mansehra	1.67	Dropped
13.	EFAP/KPID-CW-11	Rehabilitation/Restoration of Flood Protection Works/Structures in Charsadda Irrigation Division	Charsadda	1.91	C
14.	EFAP/KPID-CW-12	Rehabilitation of Flood Protection Works/Structures in District Peshawar. Peshawar Irrigation Division	Peshawar	1.82	C
15.	EFAP/KPID-CW-12 (Additional Works)	Rehabilitation of Flood Protection Works/Structures in District Peshawar. Peshawar Irrigation Division	Peshawar	--	C
16.	EFAP/KPID-CW-13	Rehabilitation of Flood Protection Structures, Swat Irrigation Division-II	Swat	4.09	C
17.	EFAP/KPID-CW-13 (Additional Works)	Rehabilitation of Flood Protection Structures, Swat Irrigation Division-II	Swat	--	C
18.	EFAP/KPID-CW-14	Rehabilitation of Flood Protection Structures, Swat Irrigation Division-I	Swat	5.01	C
19.	EFAP/KPID-CW-14 (Additional Works)	Rehabilitation of Flood Protection Structures, Swat Irrigation Division-I	Swat	--	C
20.	EFAP/KPID-CW-15	Rehabilitation/ Restoration of Bridge at Munda Head Works	Munda	0.24	C

Sr. No	Package / Scheme	Description	District	Cost (Million \$)	E&S Category w.r.t REA,
21.	EFAP/KPID-CW-16	Rehabilitation of Irrigation Systems, Dir Irrigation Division	Dir	1.26	C

ANNEXURE III : RESPONSE LETTER FROM KP-EPA



ENVIRONMENTAL PROTECTION AGENCY

CLIMATE CHANGE, FORESTRY, ENVIRONMENT

&

WILDLIFE DEPARTMENT

GOVERNMENT OF KHYBER PAKHTUNKHWA



No. EPA/EIA/General/25/ 632-33

Date: 17/02/2025

To

The Project Director,
Project Management Office,
Emergency Flood Assistance Project (EFAP),
Reconstruction and Rehabilitation of Irrigation, Drainage system and
Flood Protection Works in Khyber Pakhtunkhwa,
Irrigation House Near PRC Chowk, Mardan.
Phone No. 0937-9230193

Subject: **ENVIRONMENTAL REVIEW OF PROJECT INFORMATION DOCUMENT
& COORDINATES FOR EFAP, KP**

Ref: No. 165/PMO/EFAP dated 13/02/2025

Dear Sir,

I am directed to refer to your submission regarding the Emergency Flood Assistance Project (EFAP) for "Reconstruction and Rehabilitation of Irrigation Drainage System and Flood Protection Works in Khyber Pakhtunkhwa" and the enclosed Project Information Document along with coordinate files.

The Environmental Protection Agency (EPA) has reviewed the provided project details in light of the Khyber Pakhtunkhwa Environmental Protection Act, 2014, and the Khyber Pakhtunkhwa Environmental Assessment Rules, 2021. It is noted that the proposed interventions primarily involve the rehabilitation and repair of existing infrastructure within the defined Right of Way (RoW) of the Irrigation Department. Furthermore, based on the information submitted, there appear to be no environmentally sensitive or notified protected areas within the immediate vicinity of the project sites.

Considering the nature of the project and its scope, it is observed that the proposed activities do not fall under the categories listed in Schedules II, III, or IV of the Environmental Assessment Rules, 2021, which necessitate an Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA). However, EPA reserves the right to conduct field verifications, if necessary, and may request additional information should any environmental concerns arise during implementation.

You are advised to ensure compliance with environmental best practices, particularly concerning waste management, noise and dust control, and community safety during execution. Moreover, any unforeseen environmental impacts that may emerge during implementation should be immediately reported to EPA-KP for necessary guidance and regulatory compliance.

This letter may not be construed as a formal environmental concurrence or exemption from environmental obligations under applicable laws. It is recommended that your project team remain in close coordination with EPA-KP for any further environmental clarifications, please.

-sd-

Director General

Copy for information to:

- PA to Director General, EPA, Govt. of Khyber Pakhtunkhwa.

S. Khatun
17/02/2025
Monitoring Inspector-I
(EIA-Cell)

ANNEXURE IV: EHS AND OHS COMPLIANCE CHECKLIST/ ENVIRONMENTAL AUDITS AND INSPECTION

Emergency Flood Assistance Project

E&S and OHS Compliance Checklist

Package & Scheme: _____ Date: _____

Location: _____ Co-ordinates: _____

Ongoing Activity: _____

Construction Work Progress: _____

Labour at Site _____ Skilled: _____ Unskilled: _____

Machinery at Site with numbers: _____

Power Requirement and Source: _____

Water Requirement and Source: _____

Sr. No.	Requirements	Yes	No	Remarks
1.	SSEMP at Site			
2.	Site GRM			
3.	Site Organizational Set up Availability			
4.	Site EHS Personnel			
5.	Reporting and Communication Protocol			
6.	Availability of PPE at site for workers and visitors			

Sr. No	Aspect / Impact	Compliance requirements	Complied	Not Complied	Remarks
1.	Site Accessibility	The project site will be easily accessible without disturbance to local community and other E&S components of the area.			
2.	Water (Drinking & Surface)	No waste stream will be allowed to enter the river or other waterbody without treatment.			
		Clean drinking water will be available at site and worker accommodation as per EMP.			
		Proper monitoring of the drinking and surface water will be ensured as per EMP.			
3.	Solid & hazardous waste	Solid waste including spoils will be managed at site properly without damaging the nearby environment.			
		The Contractor will coordinate with local administration of concerned department for the disposal of solid waste.			
		Toxic and hazardous waste will be handled, stored, transported and disposed separately.			
4.	Wastewater	Direct discharge of wastewater into water body will be avoided.			

Sr. No	Aspect / Impact	Compliance requirements	Complied	Not Complied	Remarks
		Soakage Pit of will be constructed for receiving and treating wastewater.			
		The wastewater will not be discharged untreated onto the adjacent lands.			
5.	Housekeeping	Good housekeeping will be kept onsite.			
6.	Material Handling and Storage	Construction materials will be properly covered and stored.			
		Security of construction materials at site.			
		Storage of (construction) material confined to work sites.			
7.	Construction Camps & Accommodation	Campsites will be located at least 100m away from the river and settlement.			
		Adequate sanitary facilities in the worker's camps will be ensured.			
		Open burning of solid waste from the Contractor's camps and at construction site will be strictly banned.			

Sr. No	Aspect / Impact	Compliance requirements	Complied	Not Complied	Remarks
		Out of station labor must be provided with adequate accommodation comprising with ADB policies.			
		Availability of Labor Record (Personal details:name,ID,contact deatails)			
8.	Air Quality	All vehicles and machinery will be kept in good working conditions			
		Construction materials and spoil materials will be transported through trucks covered with tarpaulins.			
		Regular Sprinkling of water will be ensured to suppress the dust			
9.	Noise and vibration	Quieter equipment will be used.			
		Work activity will be scheduled.			
		No work should be carried out near community during night.			
		Machinery will be well maintained.			
10.	Ecological (Flora & Fauna)	There will be no cutting of trees for burning purposes.			
		Shooting and hunting of animals will be prevented.			

Sr. No	Aspect / Impact	Compliance requirements	Complied	Not Complied	Remarks
11.	OHS & CHS	Work method plan will be prepared for each construction activity along with OHS aspects			
		Barricading, safety signs, first aid kits, fire extinguishers, and PPEs will be ensured.			
		Accident and Incident record and procedures will be disclosed and available at site.			
		Contractor must designate flagman to ensure safety nearby traffic and community.			
		Community H&S will be ensured during the execution of activities.			
		Prior intimation to the locals will be ensured.			
12.	Social and Cultural	Local labor especially from nearby communities will be given preference for the construction works.			
		There will be no disturbance to the local community.			
		Workers will keep regards of customs of the local community.			
13.		Child labor will be prohibited			

Sr. No	Aspect / Impact	Compliance requirements	Complied	Not Complied	Remarks
	GBV/Child Labour	Provision related to GBV, SEA/SH will be incorporated worker's code of conduct			
		Availability of Contractor's Gender Specialist at the sites.			
		Issues related to GBV, SEA/SH will be recorded and			
14.	GRM/Local GRC	A local GRC will be formulated and announced.			
		Grievance reporting process will be discussed and GRM process will be informed to the locals and workers.			
		GRM Box must be present at site.			
15.	Trainings & Inductions	Emergency response training will be provided.			
		Tool box talks will be conducted regularly.			
		Meetings will be held regarding E&S, OHS, GRM, as per EMP.			
		Training for contractor's HSE staff must be scheduled regularly.			
		Training record will be maintained.			

Additional Notes

Conducted by:_____

ANNEXURE IV: PACKAGE WISE WASTE MANAGEMENT

Sr. No.	Package No.	Package Name	Contractor	Type of Wastes	Waste Management Practices
1.	EFAP/KPID-CW-02	Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Dir Irrigation Division	M/s Tribal Global Contractors (Pvt.) Limited	Construction Debris Organic Debris Trash Sediments Domestic Waste	Debris and Sediment waste is mainly produced in these sites that is placed close to the canals during their cleaning. This waste is taken by third party contractor for use of sand/sediment in nurseries and construction purposes. For organic waste like grass and wood, it is sold in nearby market. Domestic waste is produced in minimum amount is regularly collected and managed by local waste management authorities in the concerned area.
2.	EFAP/KPID-CW-03	Repair and Rehabilitation of Canals and Drains, Paharpur Irrigation Division	M/s M. Younas Builder (Pvt.) Limited	Construction Debris Organic Debris Trash Sediments Domestic Waste	Debris and Sediment waste is mainly produced in these sites that is placed close to the canals during their cleaning. This waste is taken by third party contractor for use of sand/sediment in nurseries and construction purposes. For organic waste like grass and wood, it is sold in nearby market. Domestic waste is produced in minimum amount is regularly collected and managed by local waste management authorities in the concerned area.
3.	EFAP/KPID-CW-04(Lot-1)	Rehabilitation of Canals / Distributaries Works: Lot-1: CRBC Irrigation Division DI Khan	M/s Abdul Hakim Khan & Sons (Pvt.) Limited	Construction Debris Organic Debris	Debris and Sediment waste is mainly produced in these sites that is placed close to the canals during their cleaning. This waste is taken by third party contractor for use of sand/sediment in nurseries and construction

Sr. No.	Package No.	Package Name	Contractor	Type of Wastes	Waste Management Practices
				Trash Sediments Domestic Waste	purposes. For organic waste like grass and wood, it is sold in nearby market. Domestic waste is produced in minimum amount is regularly collected and managed by local waste management authorities in the concerned area.
4.	EFAP/KPID-CW-04(Lot-2)	Rehabilitation of Canals / Distributaries Works: Lot-2: CRBC Irrigation Division DI Khan	M/s Abdul Hakim Khan & Sons Pvt. Limited	Construction Debris Organic Debris Trash Sediments Domestic Waste	Debris and Sediment waste is mainly produced in these sites that is placed close to the canals during their cleaning. This waste is taken by third party contractor for use of sand/sediment in nurseries and construction purposes. For organic waste like grass and wood, it is sold in nearby market. Domestic waste is produced in minimum amount is regularly collected and managed by local waste management authorities in the concerned area.
5.	EFAP/KPID-CW-05	Rehabilitation of Drains & FCCs in CRBC Irrigation Division DI Khan	M/S Atif Kasteer Sarwar JV	Construction Debris Organic Debris Trash Sediments Domestic Waste	Debris and Sediment waste is mainly produced in these sites that is placed close to the canals during their cleaning. This waste is taken by third party contractor for use of sand/sediment in nurseries and construction purposes. For organic waste like grass and wood, it is sold in nearby market. Domestic waste is produced in minimum amount is regularly collected and managed by local waste management authorities in the concerned area.

Sr. No.	Package No.	Package Name	Contractor	Type of Wastes	Waste Management Practices
6.	EFAP/KPID-CW-06	Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Nowshera	M/s CEMCON Pvt. Ltd.	Construction Debris Organic Debris Trash Sediments Domestic Waste	Debris and Sediment waste is mainly produced in these sites that is placed close to the canals during their cleaning. This waste is taken by third party contractor for use of sand/sediment in nurseries and construction purposes. For organic waste like grass and wood, it is sold in nearby market. Domestic waste is produced in minimum amount is regularly collected and managed by local waste management authorities in the concerned area.
7.	EFAP/KPID-CW-06A	Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Nowshera	M/s M. Younas Builder (Pvt.) Limited	Construction Debris Organic Debris Trash Sediments Domestic Waste	Debris and Sediment waste is mainly produced in these sites that is placed close to the canals during their cleaning. This waste is taken by third party contractor for use of sand/sediment in nurseries and construction purposes. For organic waste like grass and wood, it is sold in nearby market. Domestic waste is produced in minimum amount is regularly collected and managed by local waste management authorities in the concerned area.
8.	EFAP/KPID-CW-07	Repair and Rehabilitation of and Flood Protection Structures, Swat. Malakand Irrigation Division	M/s M. Younas Builder Pvt. Limited	Construction Debris Organic Debris Trash	Debris and Sediment waste is mainly produced in these sites that is placed close to the canals during their cleaning. This waste is taken by third party contractor for use of sand/sediment in nurseries and construction purposes. For organic waste like grass and wood, it is sold in nearby market.

Sr. No.	Package No.	Package Name	Contractor	Type of Wastes	Waste Management Practices
				Sediments Domestic Waste	Domestic waste is produced in minimum amount is regularly collected and managed by local waste management authorities in the concerned area.
9.	EFAP/KPID-CW-08(Lot-2)	Rehabilitation/ Restoration of Flood Protection Works in Lot-2 Marwat Canal Irrigation Division	M/s Habib Khan Builders	Construction Debris Organic Debris Trash Sediments Domestic Waste	Debris and Sediment waste is mainly produced in these sites that is placed close to the canals during their cleaning. This waste is taken by third party contractor for use of sand/sediment in nurseries and construction purposes. For organic waste like grass and wood, it is sold in nearby market. Domestic waste is produced in minimum amount is regularly collected and managed by present waste management authorities in the concerned area.
10.	EFAP/KPID-CW-9	Rehabilitation of Flood Protection Structures / Drainage System in Chitral Irrigation Division	M/s National RCC	Construction Debris Organic Debris Trash Sediments Domestic Waste	Waste produced in this case is mainly construction debris for the apron of gabion wall. Priority practice is to use this waste in leveling or upraising when it can act as a base contributing both in waste management and cost effectiveness. Domestic waste is produced in minimum amount is regularly collected and managed by present waste management authorities in the concerned area.
11.	EFAP/KPID-CW-11	Rehabilitation of Flood Protection Works in	M/s Ali & Co	Construction Debris	Waste produced in this case is mainly construction debris for the apron of gabion wall. Priority practice is to use this waste in leveling or upraising when it can act as

Sr. No.	Package No.	Package Name	Contractor	Type of Wastes	Waste Management Practices
		Charsadda Irrigation Division		Organic Debris Trash Sediments Domestic Waste	a base contributing both in waste management and cost effectiveness. Domestic waste is produced in minimum amount is regularly collected and managed by present waste management authorities in the concerned area.
12.	EFAP/KPID-CW-12	Repair and Rehabilitation of and Flood Protection Structures, Peshawar. Peshawar Irrigation Division	M/s M. Younas Builder (Pvt.) Limited	Construction Debris Organic Debris Trash Sediments Domestic Waste	Waste produced in this case is mainly construction debris for the apron of gabion wall. Priority practice is to use this waste in leveling or upraising when it can act as a base contributing both in waste management and cost effectiveness. Domestic waste is produced in minimum amount is regularly collected and managed by present waste management authorities in the concerned area.
13.	EFAP/KPID-CW-13	Repair and Rehabilitation of and Flood Protection Structures, Swat. Swat Irrigation Division-II	M/s ZKB - MCC JV	Construction Debris Organic Debris Trash Sediments	Waste produced in this case is mainly construction debris for the apron of gabion wall. Priority practice is to use this waste in leveling or upraising when it can act as a base contributing both in waste management and cost effectiveness. Waste produced in this case is mainly construction debris for the apron of gabion wall. Priority practice is to use this waste in leveling or upraising when it can act as a base contributing both in waste management and cost effectiveness.

Sr. No.	Package No.	Package Name	Contractor	Type of Wastes	Waste Management Practices
				Domestic Waste	Domestic waste is produced in minimum amount is regularly collected and managed by present waste management authorities in the concerned area.
14.	EFAP/KPID-CW-14	Repair and Rehabilitation of and Flood Protection Structures, Swat. Swat Irrigation Division-I	M/s ZKB - MCC JV	Construction Debris Organic Debris Trash Sediments Domestic Waste	Waste produced in this case is mainly construction debris for the apron of gabion wall. Priority practice is to use this waste in leveling or upraising when it can act as a base contributing both in waste management and cost effectiveness. Domestic waste is produced in minimum amount is regularly collected and managed by present waste management authorities in the concerned area.
15.	EFAP/KPID-CW-15	Restoration of Three Spans of RCC bridge at Munda Head Works (Doaba canal system)	M/s NKB	Construction Debris Organic Debris Trash Sediments Domestic Waste	Waste produced in this case is mainly construction debris for the apron of gabion wall. Priority practice is to use this waste in leveling or upraising when it can act as a base contributing both in waste management and cost effectiveness. Domestic waste is produced in minimum amount is regularly collected and managed by present waste management authorities in the concerned area.
16.	EFAP/KPID-CW-16	Repair and Rehabilitation of Irrigation Systems and Flood Protection	M/s M. Younas Builder Pvt. Limited	Construction Debris	Debris and Sediment waste is mainly produced in these sites that is placed close to the canals during their cleaning and rehabilitation. This waste is taken by third

Sr. No.	Package No.	Package Name	Contractor	Type of Wastes	Waste Management Practices
		Structures, Dir Irrigation Division		Organic Debris Trash Sediments Domestic Waste	party contractor for use of sand/sediment in nurseries and construction purposes. For organic waste like grass and wood, it is sold in nearby market. Domestic waste is produced in minimum amount is regularly collected and managed by present waste management authorities in the concerned area.

ANNEXURE VI: PACKAGE WISE MATERIAL UTILISATION

Sr. No.	Package No.	Package Name	Contractor	Amount of Material Utilised (metric tonnes)
1.	EFAP/KPID-CW-02	Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Dir Irrigation Division	M/s Tribal Global Contractors	95.8 (Boulder and wire combine)
2.	EFAP/KPID-CW-03	Repair and Rehabilitation of Canals and Drains, Paharphur Irrigation Division	M/s M. Younas Builder (Pvt.) Limited	248.77 (water bound, asphalt)
3.	EFAP/KPID-CW-04(Lot-1)	Rehabilitation of Canals / Distributaries Works: Lot-1: CRBC Irrigation Division DI Khan	M/s Abdul Hakim Khan & Sons (Pvt.) Limited	138.88 (concrete)
4.	EFAP/KPID-CW-04(Lot-2)	Rehabilitation of Canals / Distributaries Works: Lot-2: CRBC Irrigation Division DI Khan	M/s Abdul Hakim Khan & Sons Pvt. Limited	4080 (concrete)
5.	EFAP/KPID-CW-05	Rehabilitation of Drains & FCCs in CRBC Irrigation Division DI Khan	M/s Atif Kasteer Sarwar JV	550.88 (concrete)
6.	EFAP/KPID-CW-06	Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Nowshera	M/s CEMCON Pvt. Ltd.	46.23 (Boulder and wire combine)
7.	EFAP/KPID-CW-06(A)	Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Nowshera	M/s M. Younas Builder Pvt. Limited	12.50 (Boulder and wire combine)
8.	EFAP/KPID-CW-07	Repair and Rehabilitation of and Flood Protection Structures, Swat. Malakand Irrigation Division	M/s M. Younas Builder Pvt. Limited	105.8 (Boulder and wire combine)

Sr. No.	Package No.	Package Name	Contractor	Amount of Material Utilised (metric tonnes)
9.	EFAP/KPID-CW-08(Lot-2)	Rehabilitation/ Restoration of Flood Protection Works in Lot-2 Marwat Canal Irrigation Division	M/s Habib Khan Builders	44,960 (Boulder and wire combine)
10.	EFAP/KPID-CW-9	Rehabilitation of Flood Protection Structures / Drainage System in Chitral Irrigation Division	M/s National RCC	25,728 (Boulder and wire combine)
11.	EFAP/KPID-CW-11	Rehabilitation of Flood Protection Works in Charsadda Irrigation Division	M/s Ali & Co	87,552 (Boulder and wire combine)
12.	EFAP/KPID-CW-12	Repair and Rehabilitation of and Flood Protection Structures, Peshawar. Peshawar Irrigation Division	M/s M. Younas Builder (Pvt.) Limited	6,023 (Boulder and wire combine) 6732 (Concrete)
13.	EFAP/KPID-CW-13	Repair and Rehabilitation of and Flood Protection Structures, Swat. Swat Irrigation Division-II	M/s ZKB - MCC JV	89,822.4 (Boulder and wire combine) 22100 (Concrete)
14.	EFAP/KPID-CW-14	Repair and Rehabilitation of and Flood Protection Structures, Swat. Swat Irrigation Division-I	M/s ZKB - MCC JV	38,400 (Boulder and wire combine) 6600(concrete)
15.	EFAP/KPID-CW-15	Restoration of Three Spans of RCC bridge at Munda Head Works (Doaba canal system)	M/s NKB	22004(concrete)
16.	EFAP/KPID-CW-16	Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Dir Irrigation Division	M/s M. Younas Builder Pvt. Limited	15400(concrete)

ANNEXURE VIII: PACKAGE WISE E&S COMPLIANCE AND OHS STATUS

[illegible]

Sr. No.	Aspect or Impact	Compliance Requirement	Package 12	Package 11	Package 6	Package 6a	Package 7			Package 16
			Mamu Khatke	Dheri Zardad	Pir Piai Azakheil	Left Side New Wall	Amandara	Shaheed Bund 1	Matkane 2	Balambat Civil Channel
		Community H&S will be ensured during the execution of activities.	√	√	√	√	X	√	√	√
		Prior intimation to the locals will be ensured.	√	√	√	√	X	√	√	√
12	Social and Cultural	Local labor especially from nearby communities will be given preference for the construction works.	√	√	√	√	√	√	√	√
		There will be no disturbance to the local community.	√	√	√	√	√	√	√	√
		Workers will keep regards of customs of the local community.	√	√	√	√	√	√	√	√
13	GBV/Child Labour	Child labor will be prohibited.	√	√	√	√	√	√	√	√
		Provision related to GBV, SEA/SH will be incorporated worker's code of conduct.	√	√	√	√	√	√	√	√
		Availability of Contractor's Gender Specialist at the sites.	√	X	X	√	√	√	√	√
		Issues related to GBV, SEA/SH will be recorded.	√	X	√	√	√	√	√	√
14	GRM/Local GRC	A local GRC will be formulated and announced.	√	√	√	√	√	√	√	√
		Grievance reporting process will be discussed and GRM process will be informed to the locals and workers.	√	X	√	√	√	√	√	√
		GRM Box must be present at site.	√	X	√	√	X	X	X	X
15	Trainings & Inductions	Emergency response training will be provided.	√	X	√	√	X	X	X	X
		Tool box talks will be conducted regularly.	√	X	√	√	X	X	X	X
		Meetings will be held regarding E&S, OHS, GRM, as per EMP.	√	X	√	√	X	√	√	√
		Training for contractor's HSE staff must be scheduled regularly.	√	X	√	√	X	X	√	√
		Training record will be maintained.	X	X	√	√	X	X	X	X

ANNEXURE VIII: EFAP E&S Progress Ledger

Sr. No.	Package	Activity	District	Eco DDR and Updated EMP	REA, IR&IP	EMP	Contract or Mobilized	E&S Compliance Visits	SSEMP Status	LGRCs	LGRC Meeting	Gender Consultations	Female LGRC	VLD, ROW and Custodian Status Verified From KPID Officials	Verification from Revenue Office	SDDR Status	Identification of New Schemes	Update of REA, IR&IP	Update of EMP
1.	EFAP/KPID-CW-01	Rehabilitation of Munda Head Works & Doaba Canal System	Charsadda	Package has been dropped															
2.	EFAP/KPID-CW-02	Repair and Rehabilitation of Irrigation Systems and Flood Protection Structures, Dir Irrigation Division	Dir	NA	Yes	Yes	Yes	All Active Sites	Reviewed and Shared with Comments	02	Yes	Yes	Yes	Completed	Completed (XEN Shahid Ali Khan)	Completed (Combined 16 and 2)	-	-	-
3.	EFAP/KPID-CW-03	Repair and Rehabilitation of Canals and Drains, Paharphur Irrigation Division	DI Khan	NA	Yes	Yes	Yes	All Active Sites	Reviewed and Shared with Comments	05	Yes	Yes	Yes	No Private Land Involved (RoW Confirmed)	Completed	Combine Completed	-	-	-
4.	EFAP/KPID-CW-04	Rehabilitation of Canals / Distributaries Works: Lot-1: CRBC Irrigation Division DI Khan	DI Khan	NA	Yes	Yes	Yes	All Active Sites	Reviewed and Shared with Comments	04	Yes	Yes	Yes	No Private Land Involved (RoW Confirmed)	Completed		-	-	-
		Rehabilitation of Canals / Distributaries Works: Lot-2: CRBC Irrigation Division DI Khan	DI Khan	NA			Yes	All Active Sites	Reviewed and Shared with Comments	02	Yes	Yes	Yes	No Private Land Involved (RoW Confirmed)	Completed		-	-	-
5.	EFAP/KPID-CW-05	Rehabilitation of Drains & FCCs in CRBC Irrigation Division DI Khan	DI Khan	NA	Yes	Yes	Yes	All Active Sites	Not Received (Letter Sent for Submission)	06	Yes	Yes	Yes	No Private Land Involved (RoW Confirmed)	Completed		-	-	-
6.	EFAP/KPID-CW-06	Repair and Rehabilitation of Irrigation Systems	Nowshera	NA	Yes	Yes	Yes	All Active Sites	Reviewed and Shared with	01	Yes	Yes	Yes	No Private Land Involved (RoW	Completed (XEN Saifullah Khan)	Completed	-	-	-

[illegible]

Sr. No.	Package	Activity	District	Eco DDR and Updated EMP	REA, IR&IP	EMP	Contract or Mobilized	E&S Compliance Visits	SSEMP Status	LGRCs	LGRC Meeting	Gender Consultations	Female LGRC	VLD, ROW and Custodian Status Verified From KPID Officials	Verification from Revenue Office	SDDR Status	Identification of New Schemes	Update of REA, IR&IP	Update of EMP
12.	EFAP/KPID-CW-11	Rehabilitation of Flood Protection Works in Charsadda Irrigation Division	Charsadda	Completed	Yes	Yes	Yes	All Active Sites	Reviewed and Shared with Comments	01	Yes	Yes	Yes	Completed	Completed (XEN M. Iqbal)	Completed	-	-	-
13.	EFAP/KPID-CW-12	Repair and Rehabilitation of and Flood Protection Structures, Peshawar. Peshawar Irrigation Division	Peshawar	NA	Yes	Yes	Yes	All Active Sites	Reviewed and Shared with Comments	01	Yes	Yes	Yes	Completed	Completed (XEN Saifullah Khan)	Completed	New schemes has been identified for which VO is in progress	Yes	Same will be used as current contract or via VO will implement
14.	EFAP/KPID-CW-13	Repair and Rehabilitation of and Flood Protection Structures, Swat. Swat Irrigation Division-II	Swat	Completed	Yes	Yes	Yes	All Active Sites	Reviewed and Shared with Comments	02	Yes	Yes	Yes	Completed	Completed (XEN Anwarullah Khan)	Completed (Combined 13 and 14)	New schemes has been identified for which VO is in progress	Yes	Same will be used as current contract or via VO will implement
15.	EFAP/KPID-CW-14	Repair and Rehabilitation of and Flood Protection Structures, Swat. Swat Irrigation Division-I	Swat	Completed	Yes	Yes	Yes	All Active Sites	Reviewed and Shared with Comments	01	Yes	Yes	Yes	Completed	Completed (XEN Saif Ur Rehman)		New schemes has been identified for which VO is in progress	Yes	Same will be used as current contract or via VO will implement
16.	EFAP/KPID-CW-15	Restoration of Three Spans of RCC bridge at Munda Head Works (Doaba canal system)	Charsadda	NA	Yes	Yes	Yes	All Active Sites	Reviewed and Shared with Comments	01	Yes	Yes	Yes	No Private Land Involved (RoW Confirmed)	Completed	Completed	-	-	-
17.	EFAP/KPID-CW-16	Repair and Rehabilitation of Irrigation Systems and Flood Protection	Dir	NA	Yes	Yes	Yes	All Active Sites	Reviewed and Shared with Comments	02	Yes	Yes	Yes	No Private Land Involved (RoW)	Completed (XEN Shahid Ali Khan)	Completed (Combined 16 and 2)	-	-	-

Sr. No .	Package	Activity	District	Eco DDR and Updated EMP	REA , IR&I P	EM P	Contract or Mobilize d	E&S Complian ce Visits	SSEMP Status	LGRC s	LGRC Meetin g	Gender Consultatio ns	Femal e LGRC	VLD, ROW and Custodi an Status Verified From KPID Officials	Verificati on from Revenue Office	SDDR Status	Identificati on of New Schemes	Updat e of REA, IR&IP	Update of EMP
		Structures, Dir Irrigation Division												Confirme d)					

PHOTOLOG

(Package 12: Mamu Khatke Site)

	
Complaint Box	No Barricading of Material
	
Complaint Register	Working Wearing PPEs
	
Meeting with Contractors Staff	First Aid Kit



Reflective Cones



Drinking Water Cooler and Glass



Workers Wearing PPEs



Proper Barricading done



Package 11: Dheri Zardad Site



Meeting with Contactor Staff



Labours having proper PPEs but color coding issue



Uncleaned dumper



Security Personnel at site



Mixer in Poor Condition



No Barricading of Site

Package 6: Pir Piai Azakheil Site



Proper Barricading of Site



Waste Bin Available



Meeting with Contractor Staff



Sign boards Installed



GRM Setup



Monitoring Equipment



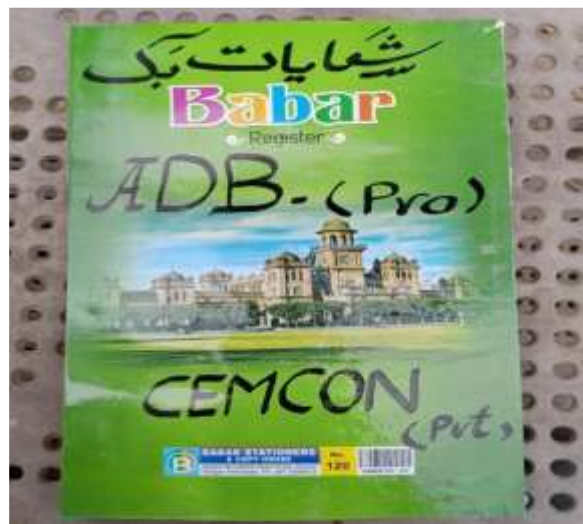
Workers Wearing PPEs



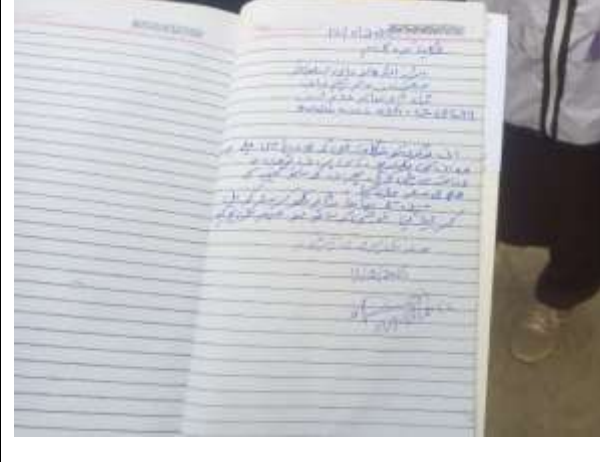
Barricading of Storage

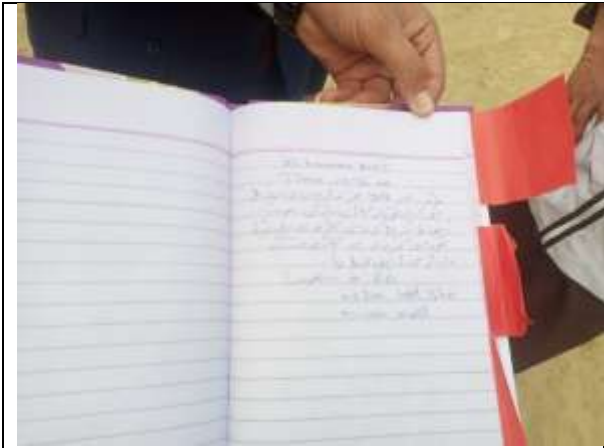




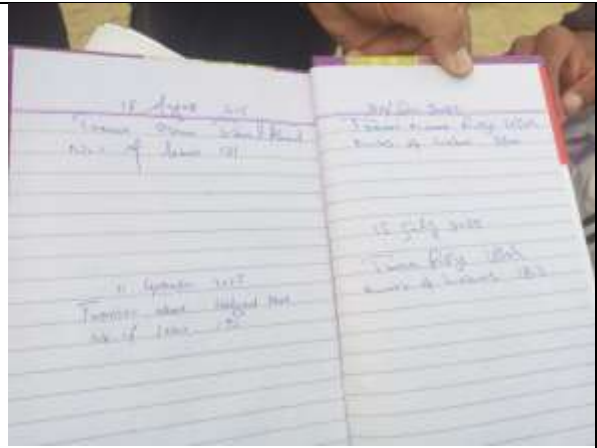


Package 6a: Left Side New Wall

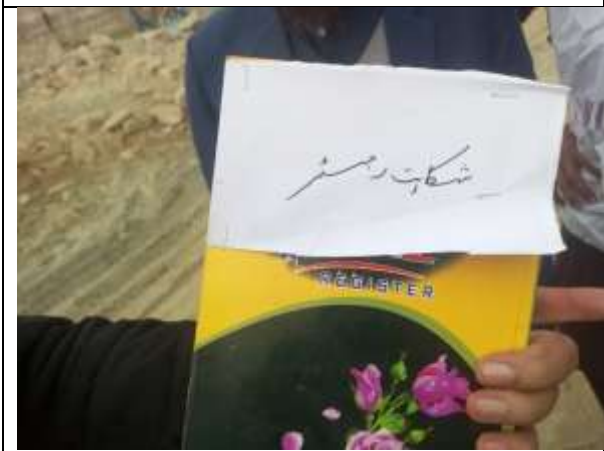
	
Barricading and Safety Signs	No Barricading of Access Route
	
GRM Setup	First Aid Kit
	
No Barricading of Storage Area	Complaints Noted



Training Record



Tool Box Talks Record



Complaint Register



Complaint Box



Package 7: Amandara Site

	
No Barricading of Site	No Barricading of Storage
	
No PPEs being Used	

Package 7: Shaheed Bund 1 Site



PPEs used but Damaged



Meeting Contractors Staff



Safety Signs



No Barricading of Access Routes



Barrication of Site



Emergency Numbers

Package 7

 A photograph showing three men standing outdoors at a construction site. One man on the left wears a green hard hat and a high-visibility yellow vest. The other two men are in civilian clothing. They are looking at a small object, possibly a clipboard or a piece of equipment, held by the man in the middle. The background shows a hilly, mountainous landscape under an overcast sky.	 A photograph of a single orange and white plastic water cooler sitting on a dry, dusty ground. The cooler has a white top and an orange body with a handle.
Meeting with Contractor Staff	Water Cooler Available
 A close-up photograph of a person wearing an orange high-visibility safety vest. They are holding a bright yellow hard hat with both hands. The hard hat appears to be cracked or broken. The ground is covered with small stones and dirt.	 A photograph of a construction site with a low stone wall in the foreground. In the background, a group of people is standing near a tall, narrow safety sign board. The sign board has text and symbols, but they are not clearly legible. The background shows mountains and a hazy sky.
Broken PPE	Safety Sign Boards
 A photograph of a construction site. In the foreground, there is a pile of large, flat stones. In the background, a red excavator and a white car are visible. A person is walking towards the excavator. The site is surrounded by hills and mountains.	 A photograph of a construction site with a low stone wall in the foreground. In the background, a group of people is standing near a tall, narrow safety sign board. The sign board has text and symbols, but they are not clearly legible. The background shows mountains and a hazy sky.
No Barricading of Access Route	No Barricading of Site



Labour not Wearing Proper PPE



No Barricading of Storage



Package 16



Cooler Available for Site



Safety Signs



No Barricading of Site



No Barricading of Access Route



Poor Lighting in Labour Camp



Washroom Conditions

Package 3





Package 5



Package 14



Package 14



Package 13



Package 13



SITE VISIT PHOTOLOG

	
Construction Activities without PPEs and Safety measures at Package 12 (Mamu Khatki)	Construction Activities with PPEs and Limited Safety measures at Package 6 (Reach 2)
	
Gabion Wall Works at Dhaggi Faizaulah (Package 11)	Consultation with Community Village Qamar Chagharmatti (Package 11)
	
Site Safety Sign Board by ZKB (Contractor of Package 13 and 14)	Construction Activities with PPEs and Limited Safety measures at Dir



Safety Meeting with Labor at site at package
13 & 14



Labor Working at Package 13 and 14 along
Swat River with PPEs



Consultation with Male Community Representatives



Engagement with Community Members



Public consultation at Aligram



Ensuring Availability of First Aid Kit at Project Site



Verifying Contents of First Aid Box



Filling Environmental Compliance Checklist during Site Visit



Filling Environmental Compliance Checklist during Site Visit at Jalawanan Site



Consultation with GRC Members at Package 16



Consultation with GRC Members at Package 2



GRC meeting at Takhtaband



GRC meeting at Asharay



GRC meeting and Female consultation at Kuza Asala



Consultation with female GRC Members at Khaal



Consultation with female GRC Members at Shalfalam



Consultation with female GRC members at Hisar Baba



Visit to Footbridges at Shalfalam

Public Consultation



Mamun Khattak (Package 12)

List of Participants

Sr. No.	Name	Occupation	Signature/ Thumb (NIC)
1	Ajmal Shah so Liaquat Ali	Labour	
2	Amir Badshah so Syed Khan Badshah	Trickster	
3	Ilyas so M. Nisar	Labour	
4	Milaeel so Ziaul Gull	Labour	
5	Khadim Shah so Mubassir Shah	"	Khadim Shah
6	Zawar Khan so Ghaffar Khan	"	
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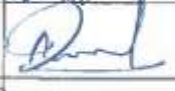
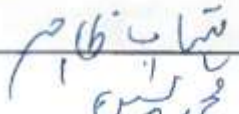
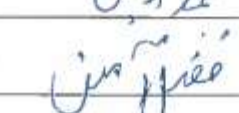
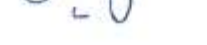
Dheri Zardad (Package II)

List of Participants

Sr. No.	Name	Occupation	Signature/ Thumb (NIC)
1	Sujat so Fazal Haleem	Tractor operator	
2	Tuneid so Sheraz Khan	Roller operator	
3	Bilal so Abdur Rasheed	Driver.	
4	Zubair	Helper.	
5	Umeidullah so Fazal Haleem	Labour.	-
6	Tuneid so Fazal Haleem	"	-
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{Dir Piai Azakheil (Package 6)}

List of Participants

Sr. No.	Name	Occupation	Signature/ Thumb (NIC)
1	Zahir Gul so Baghi Gul	Livestock	
2	Ameer Raza so Nazeer Muhammad	11	
3	M. Shabir so Fatehuddin	11	
4	Shahab Zahir so Zahir Gul	11	
5	M. Yaseen so Yaghi Gul	11	
6	Fazal-e-Ameer so Wahid Gul	11	
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15			



Balkhela (Pachage 7)

List of Participants

Sr. No.	Name	Occupation	Signature/ Thumb (NIC)
1	M. Zahir so M. Husein	Farmer	
2	Altaf Ahmed so Fazal Ahmed	4	
3	M. Arit so M. Saadip	Labour	
4	Abdul Majid so Abdul Majid	Engr.	
5	M. Zahid so Bakhtawar Khan	Retired old	
6	Kamal so Ameer	Farmer	
7	Shayan so Mubtiaz Ali	Crush Plant owner	
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Attendance Sheet

Village Name Arifgram Tehsil Chakwal Dist Swat Date 16-7-2025

Sr. No.	Name	Occupation	Signature
1	Fazal Sultans	Labourer	
2	Muhammad	Driver	
3	Jawad	Driver	
4	A. Khan	Driver (local)	
5	Shah Muhammad	Farmer	
6	Said	Shahzade	
7	Fazal Khan	Labourer	
8	Shamshad	Matron	
9	Shahin	Farmer	
10	Rahimullah	Farmer	
11	Bacha Zada	Farmer	
12	Usman Ali	Shahzade	
13	Saimullah	Labourer	
14	Muhammad	Labourer	

Attendance Sheet

Village Name Jalalabad Tehsil Chakwal Dist Swat Date 16-7-2025

Sr. No.	Name	Occupation	Signature
1	Fazal Shah	Farmer	
2	Ubaudullah	Labourer	
3	Muhammad	Student	
4	Muhammad Rahman	Labourer	
5	Agha Khan	Local	
6	Zubair	Labourer	
7	Asimul	Doctor	
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14			

Attendance Sheet

Village Name Madina Tehsil Chakwal Dist Swat Date 16/07/2025

Sr. No.	Name	Occupation	Signature
1	Bushra Bibi	Private Teacher	
2	Saim feroz	House wife	
3	Shagufa	"	
4	Asma Bibi	"	
5			
6			
7			

Attendance Sheet

Village Name Madina Tehsil Chakwal Dist Swat Date 16-7-2025

Sr. No.	Name	Occupation	Signature
1	Asimul Khan	Soc. worker	
2	Kashif Khan	Social worker	
3	Mubarak Ali Shah	Local person	
4	Saim Khan	Local person	
5	Fazal Khan	Social worker	
6	Muhammad Zahir	Driver	
7	Muhammadullah	Social worker	
8			
9			

Attendance Sheet

Village Name Sonban Sahra Tehsil Mulla Dist Swat Date 17/07/2025

Sr. No.	Name	Occupation	Signature
1	Aziz-ur-Rahman	Govt Teacher	
2	Fazal Karim	Farmer	
3	Ashraf Khan	Doctor	
4	Sarjeen	Medicine	
5	Nasir Aja	Driver	
6			
7			

Attendance Sheet

Village Name Kuza Tehsil Chakwal Dist Swat Date 17/07/2025

Sr. No.	Name	Occupation	Signature
1	Orlehad	Teacher	
2	Fazal Shah	"	
3	Shah Bano	House wife	
4	Ashraf Khan	"	
5	Rahmat Begum	"	
6	Ramona	"	
7	Ameera	House wife	
8			
9			



NATIONAL ENGINEERING SERVICES PAKISTAN (PVT) LIMITED

Attendance Sheet

Village Name Arharay, Tehsil Matha Distt. Swat Date 17/7/25

Sl. No.	Name	Occupation	Signature
1	Ladia	House wife	[Signature]
2	Uzma	"	Uzma Inam
3	Kalsoom	"	[Signature]
4	Bakht Raza	"	[Signature]
5			
6			
7			



NATIONAL ENGINEERING SERVICES PAKISTAN (PVT) LIMITED

Attendance Sheet

Village Name 208 Mochi, Tehsil Keshal Distt. Dir (L) Date 18/07/25

Sl. No.	Name	Occupation	Signature
1	Majidha	House wife	[Signature]
2	Zahab	"	[Signature]
3	Khalid Khalid	Engineer	[Signature]
4	Rahat Nawaz	Business	[Signature]
5	Om! Boudshah	Chairman	[Signature]
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NATIONAL ENGINEERING SERVICES PAKISTAN (PVT) LIMITED

Attendance Sheet

Village Name Shahpala, Tehsil Swat Distt. Swat Date 19/7/25

Sl. No.	Name	Occupation	Signature
1	Shahla Biki	Teacher	[Signature]
2	Fareesa	House wife	[Signature]
3	Masarat Begum	Private Teacher	[Signature]
4			
5			
6			
7			



NATIONAL ENGINEERING SERVICES PAKISTAN (PVT) LIMITED

Attendance Sheet

Village Name Shahpala, Tehsil Swat Distt. Swat Date 19/7/25

Sl. No.	Name	Occupation	Signature
1	Hazrat Ali	Driver	[Signature]
2	Shah Anwar	Labourer	[Signature]
3	Muhammad Faraz	Labourer	[Signature]
4	Abid Ullah	Business	[Signature]
5	Badsha Hussain	Driver	[Signature]
6	Sadiq Ullah	Business	[Signature]
7	Hussain Ali	"	[Signature]
8	Asad Ullah	"	[Signature]
9	Lumman	Labourer	[Signature]
10	Imdad	Labourer	[Signature]
11	Asghar Ali	"	[Signature]
12	Mudabbir	"	[Signature]
13	Ayaz	"	[Signature]
14			