Program Safeguard Systems Assessment (Draft)

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Pakistan: Punjab Nursing and Health Workforce Reform Program

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PROGRAM SAFEGUARD SYSTEMS ASSESSMENT

A. Program Environmental and Social Impacts and Risks

1. Introduction

1. The Punjab Nursing and Health Workforce Reform Program in Pakistan intends to optimize health workforce availability, quality, and performance by supporting the availability of an adequately skilled health workforce to fulfill current and emerging health needs. This results-based loan (RBL) program will be executed by the Punjab Specialized Healthcare and Medical Education Department (SHC&MED) as executing agency. The SHC&MED will establish a program implementation unit (PIU) with dedicated staff as the implementing agency.

2. At the heart of the program, three state-of-the-art centers of excellence (COEs) for nursing education will be established—in Lahore, Multan, and Rawalpindi. These COEs will embody the best international practices, featuring cutting-edge curricula, fully digital learning environments, advanced simulation labs, and climate-resilient infrastructure. They will also serve as degree-conferring institutions, attracting top talent through competitive admissions and cultivating a culture of academic and professional excellence. The COEs will align with global accreditation standards, such as those outlined by the World Health Organization and the National League of Nursing.

3. The program's overarching goal is to optimize the availability, quality, and performance of the health workforce in Punjab, ensuring it can meet the current and emerging health needs of the population. This aligns with global efforts to achieve universal health coverage and meet Sustainable Development Goals (SDGs), particularly SDG 3 (good health and well-being), SDG 5 (gender equality), and SDG 8 (decent work and economic growth).

4. The three project outputs are (i) output 1: quality of nursing professionals improved; (ii) output 2: climate-resilient and gender-sensitive COEs for nursing education established; and (iii) output 3: governance and management for health workforce strengthened.

5. Planned activities under output 1 will improve the quality of nursing professionals by enhancing faculty capacity, expanding specialized training, modernizing curricula, and establishing continuing professional education standards. It will also promote equitable access through digital links between the COEs and the province's 44 public nursing colleges.

6. Output 2 will support the construction and operationalization of three climate-resilient and energy-efficient COEs (in Multan, Lahore, and Rawalpindi), complete with simulation labs, digital learning platforms, and student hostels. These COEs will serve as regional training hubs for undergraduate, postgraduate, and short-term specialized nursing programs.

7. Only output 2 of the program will invest in the development of the three new COEs. The program activities and works are subject to comply with the national and provincial legal frameworks and the safeguard policy requirements of the Asian Development Bank (ADB).

8. This initiative directly supports the Punjab Health Sector Strategy, 2019–2028 and the Pakistan Nursing and Midwifery Policy Framework, 2025–2034, aligning with national and global priorities, including the SDGs. Expanding nursing education and professional development opportunities will enhance women's labor market participation while addressing critical public health needs.

9. The program safeguard systems assessment (PSSA) document summarizes the findings of the PSSA undertaken for the program. The PSSA assessed the program's likely positive and negative environmental impacts and risks, the implementation of the legislative system, and the capacity of the executing and implementing agencies to handle environmental safeguards to identify the required incremental improvements. The PSSA examined the environmental and social safeguards management and compliance aspects of the Government of Pakistan and of the systems in place at the executing agency (the SHC&MED). The implementing agency will be the PIU of the SHC&MED to ascertain congruence with the safeguard policy principles of ADB and its Safeguard Policy Statement (2009) (SPS).

10. The PSSA was prepared through (i) document reviews, (ii) interviews with representatives of government agencies, (iii) multilateral institutions and development agencies working in the sector, and (iv) field visits of proposed sites. The safeguards-related actions have been provided in the program action plan (PAP) as Annex 3 and will be monitored during the program's implementation. Furthermore, the environmental assessment review framework (EARF) and resettlement framework have also been prepared for this RBL program to enable the implementing agency to ensure all ADB safeguard policy principal requirements for both environmental and social safeguards issues are fulfilled during the program activities.

11. The environmental and social impacts and risk assessment revealed that the program triggers two ADB safeguards: environment, and involuntary resettlement. The program does not trigger Indigenous Peoples safeguards.

2. Environmental Safeguards Risks

12. The program will involve physical activities, including construction of three COEs to be built in south (Multan), central (Lahore), and north (Rawalpindi) Punjab. These COEs will feature state-of-the-art simulation labs; digital libraries; smart classrooms; climate-resilient designs, including solar energy systems, natural ventilation, and disaster-resistant structures; and student hostels with secure accommodation and gender-sensitive amenities, and existing public sector nursing schools will be linked to the COEs via digital infrastructure and student rotation programs to enhance the quality of training across the province. However, the Government of Punjab is aiming to establish a medical city in Lahore for providing centralized medical facilities, education, and research for addressing growing health care needs of the province and is considering establishing the Lahore COE in that site.[1]

13. Potential environmental impacts during the pre-construction and construction phases of the program are primarily associated with (i) fugitive dust emissions and localized air pollution from excavation, earth movement, exposure of bare soil to wind, and transport of construction materials; (ii) increased noise and vibration from construction equipment and activities, potentially affecting nearby residents and sensitive facilities; (iii) soil erosion, sedimentation, and water contamination risks from lack of drainage or improper site management; (iv) solid waste generation; (v) hazardous waste management, particularly for materials containing asbestos and medical waste that may be present in an existing health facility to be demolished for COE construction (e.g., the TB Center in Rawalpindi); (vi) traffic disruption and access issues because of increased movement of construction vehicles; and (vii) occupational and community health and safety risks for workers and nearby residents. These impacts are short term and site-specific and

[1] The Herald Today. 2025. Punjab Government Launches Landmark Health Projects Under Maryam Nawaz's Vision. News release. 21 August.

can be mitigated by applying standard construction management practices. No significant environmental impacts are anticipated from the operation of facilities to be supported under the program. During operation, domestic waste, medical waste, domestic wastewater, and medical wastewater from COEs shall be managed by integrating those facilities into the local municipal services (water supply, solid waste, and sewage collection and disposal) and medical waste collection and disposal system. These impacts can be mitigated effectively by applying standard operational management practices. Given the program scope and due diligence conducted during program preparation, potential activities to be financed by the program will only be environment categories B and C.

14. **High-risk activities.** Under the program, no high-risk activities shall be permitted that may fall into category A and require preparation of an environmental impact assessment (EIA) study as per the ADB SPS. Screening to ensure all such activities are excluded from the program will be conducted by the PIU using the rapid environmental assessment (REA) checklist (Annex 1) and the involuntary resettlement impact categorization checklist (Annex 2). The detailed environmental and social safeguards risk assessment and consultation report is attached as Annex 5.

3. Social Safeguards Risks

15. The planned COEs at Lahore, Multan, and Rawalpindi will ideally be strategically located on available public land within the precincts of tertiary care hospitals to avoid involuntary land acquisition and resettlement impacts. In case vacant land is unavailable within the precincts of the tertiary care hospitals, the COEs can be hosted on other government owned land nearby, preferably within the SHC&MED portfolio. For the COE in Lahore, vacant land was not available within the premises of any tertiary care hospital in the SHC&MED portfolio so a government owned land parcel opposite an under construction government owned health facility (Nawaz Sharif Institute for Cancer Treatment) along Pine Avenue in Valencia town has been earmarked as a potential site to establish the COE. The site is within the LDA city which is government land owned by the Lahore Development Authority. However, the specific location of the site to be allocated for the medical city is not yet confirmed. The selected site will be screened for involuntary resettlement impacts following the resettlement framework prepared for the program. In Multan, the SHC&MED owned vacant land reserved for a medical university and nursing colleges within the premises of the Nishter-II Hospital has been selected as the site for the COE. In Rawalpindi, the COE will be established on government land available within the premises of the Mother Care Child Hospital (under construction). The SHC&MED is the landowner of the site for the COE in Multan, and for the Lahore and Rawalpindi sites the SHC&MED has approached the land revenue authorities and the Board of Revenue Punjab to transfer the land to the SHC&MED.

16. The reserved vacant land within the premises of the Nishter-II Hospital in Multan is free of encumbrances, while the land within the premises of the Mother Care Child Hospital in Rawalpindi is partly free of encumbrance and partly occupied by the Federal Tuberculosis Hospital/Center (outdoor patient facility operating under the Federal Ministry of Health) that will have to be shifted to a nearby hospital. As a precautionary approach, the program has been categorized B for involuntary resettlement.

17. The PIU will ensure that sites involving expropriation of private land with significant involuntary resettlement impacts that may fall in involuntary resettlement category A are screened and excluded. In case of impacts on informal land use or encroachments on any site, the requirements of the SPS and the provisions outlined in the agreed resettlement framework shall

be applied. The involuntary resettlement screening checklists and relevant provision in the resettlement framework provided as Annexes 2 and 7 will be used. Involuntary resettlement impacts from the clearance of assets and restriction on informal land uses as well as social risks associated with interrupted access to health facilities will be screened and reviewed further to prepare the required safeguards due diligence document including resettlement plan (if required) after detailed design and exact demarcation of the land area required to establish the COEs at the selected sites.

18. The program is designed for the Punjab province where there are no Indigenous Peoples and/or tribal groups having distinct indigenous culture, language, and attachment to distinct habitat and/or having socioeconomic, political, and administrative institutions different from the mainstream population. The program has therefore been categorized C for Indigenous Peoples.

B. Environmental and Social Safeguard Policy Principles Triggered

19. The distinct nature of RBL programs requires that they rely on the program systems to address social and environmental issues. Accordingly, the implementation of RBL programs will follow the same policy objectives and principles as in the SPS, but not its policy delivery process and operational procedures. The RBL programs use the government's fiduciary and safeguards systems. To address the environmental safeguards-related risks likely from output 2, environmental safeguard principles 1–11 of the SPS may be triggered. The site selection for civil works avoids development within protected areas (e.g., national parks, wildlife sanctuaries) in accordance with Pakistan's laws and regulations. While this significantly reduces the likelihood of encountering critical habitats, it does not eliminate the risk entirely, as critical habitats may also exist outside protected areas. A preliminary biodiversity screening using the Integrated Biodiversity Assessment Tool will be conducted for the candidate sites to ensure that no critical habitats are present in the proposed locations. Whereas for addressing likely social safeguards-related risks, involuntary resettlement safeguard principles 1–5 and 7–12 of the SPS may be triggered, and it is expected that the implementation of the program will not trigger Indigenous Peoples safeguards principles of the SPS because Indigenous Peoples as defined in the SPS are not found in Punjab province. The summary table of safeguard policy principles triggered is presented in Annex 4.

C. Diagnostic Assessment

1. Assessment Methodology and Resources

20. For safeguards due diligence and preparation of the PSSA report including the PAP, EARF, and resettlement framework, safeguards consultants were fielded. This preliminary assessment is conducted following ADB staff guidance for RBL programs.[2] The assessment methodology followed (i) a desk review of program documents; national and provincial legal and policy frameworks including rules, regulations, and safeguards management systems with institutional setup in place for the SHC&MED as executing agency and the PIU of the SHC&MED as the implementing agency; (ii) a review of safeguards-related documents prepared for previously processed similar RBL programs within the country and the region; (iii) consultations with the key stakeholders including the executing agency (EA), implementing agency (IA), Infrastructure Development Authority of Punjab (IDAP) staff, and local communities; and (iv) field visits to the COE sites in Multan, Lahore, Rawalpindi (the detailed environmental and social safeguards risk assessment and consultation reports are in Annex 5).

[2] ADB. 2023. *Technical Staff Guidance for Results-Based Lending for Programs*.

21. Environmental and social safeguards policy principles and social safeguards requirements (involuntary resettlement- and Indigenous Peoples-related requirements II and III) in the SPS were reviewed and gap-filling measures were suggested to address the noted difference between the national legal framework and the SPS. A diagnostic assessment of the institutional setup of the executing agency and implementing agency was carried out to assess the safeguards management capacity at different levels and suggest capacity development measures required for smooth implementation of the program. Field visits and consultation were conducted to observe the ground situation and to discuss and understand the safeguard risks and challenges at the school level and remedial measures required to avoid and minimize the potential risks. Accordingly, the PSSA and PAP were finalized.

2. Environment

22. **Policy and legal framework.** The environmental legislative and institutional framework of Punjab province is regulated by the Punjab Environmental Protection Act 2012, Punjab Environmental Protection (Review of IEE/EIA) Regulations 2022, and the Punjab Environmental Protection Act 2012 (Delegation of Powers for Environmental Approvals) Rules, 2017 which determines the appropriate extent and type of environmental assessment and documents to be prepared according to the environmental category of the project. According to the Punjab Environmental Protection Act 2012 (IEE/EIA Regulations 2022, Schedule I, Subsection I), preparation of IEEs will be required for establishment of COEs with moderate impacts and approval will be required from the Environmental Protection Agency (EPA Punjab).

23. The desk review concludes that the Punjab provincial environmental safeguard system is broadly aligned with the ADB policy principles. However, there are several differences between the Punjab Environmental Protection Act 2012 and ADB's Policy on Environmental Safeguards.[3] ADB's SPS explicitly addresses climate change and cumulative impacts by requiring climate risk assessments and integration of mitigation and adaptation measures, along with evaluation of cumulative environmental effects during project planning. In contrast, Pakistan's Environmental Protection Act 1997 does not directly mention climate change, which is instead covered under separate national policies, and while cumulative impacts are referenced in EIA and/or IEE regulations, their assessment is less rigorously implemented because of limited institutional capacity. It also lacks provisions for protecting biodiversity, focusing more on pollution control and environmental degradation. No specific government mechanism is required for addressing grievances through grievance redress mechanism (GRMs). Other gaps include the requirement to disclose environmental monitoring reports and conduct meaningful consultations at an early stage of the project cycle. Detailed analysis is provided in the EARF (Annex 7). These weaknesses, along with other potential environmental and institutional risks identified in the assessment, will be addressed through the PAP. ADB will be updated on the implementation of the program safeguard actions through the semiannual environmental monitoring reports and resettlement monitoring reports. The PIU will prepare these semiannual environmental monitoring reports and submit them to ADB for review and disclosure each January and July during program implementation.

24. **Institutional arrangements.** This RBL program will be executed by the SHC&MED of the Punjab. The SHC&MED, being an administrative department, mainly focuses on overall regulation of the health services and medical education facilities, legislation, policy formulation, and implementation of reforms for enhanced health services delivery and medical education across

[3] ADB. 2009. *Safeguard Policy Statement*.

the province. It has aimed to improve service delivery by revamping the existing infrastructure and by adding new schemes for capacity enhancement. However, the SHC&MED lacked the in-house capacity and expertise needed to assess existing infrastructure; determine and recommend infrastructure rehabilitation and upgrading requirements; or prepare feasibility reports including required safeguards due diligence documents including for resettlement plans, IEEs, and EMPs for projects funded by international financial institutions (IFIs), Planning Commission Form-1s (PC-1s)[4], and concept notes for review and approval by competent authorities. The SHC&MED has planned to establish a PIU under the special secretary (development and reforms) for engaging the required expert staff to overcome its capacity constraints. As per the approved structure, the PIU headed by a project director will have skilled professionals across diverse fields such as health economics, and directors with needed technical expertise in human resource, law, infrastructure, medical education, and internal delivery. The goal of establishing the PIU is to ensure that the SHC&MED has the necessary expertise in these critical areas to effectively assess, plan, manage, and oversee its development projects and its operations.

25. The review of the PMU structure and approved PC-I for the PMU found that many key expert positions needed for smooth implementation of the RBL program, including environmental and social safeguard specialists for ensuring compliance with outlined safeguard requirements of the IFIs such as ADB, are missing from the PMU structure. Therefore, it is recommended that a PIU with requisite expert staff including an environmental and social safeguards specialist should be established for augmenting the capacity of the SHC&MED to ensure that the implementation of the program is compliant with the outlined policy requirements of ADB. The aim is that the PMU, supported by a recommended PIU for delivery of the RBL program, will be mandated to operate as the implementing agency for the program. Expert environmental staff hired and deployed in the PIU will ensure the outlined provisions of the EARF are followed and complied with in conducting safeguards due diligence of all selected COE sites eligible for interventions under output 2 of the program. The Terms of Reference (TOR) for hiring an environmental safeguards specialist for the PIU is attached as Appendix 5 of the EARF. The recommended environmental safeguards staff will assist the PIU in screening environmental safeguards impacts and risks, conducting stakeholder consultation, and preparing safeguards due diligence documents including IEEs. The respective safeguards experts will assist the implementing agency in monitoring implementation progress on environmental safeguards-related interventions and deliver the periodic (semiannual) environmental safeguards monitoring reports for the executing agency and implementing agency and for ADB's review and disclosure. In addition to performing activities stated above, the safeguards expert in the PIU will design and implement safeguards capacity building plans for staff in the implementing agency and/or executing agency and its implementing partner selected for executing and supervising the interventions for developing physical infrastructure and establishing COEs as outlined in the designed outputs of the program. The expert will work closely with the technical and safeguards staff deployed by the implementing partner at each COE camp office for providing on-the-job coaching and guidance about handling and managing safeguard issues and risks that may emerge during execution of the program activities.

26. Infrastructure development works for establishing COEs under output 2 will be executed through the IDAP. The respective offices of general managers of health care projects established under the chief operating officer of the IDAP will be engaged as service providers. The COE-specific engineering design, cost estimates, procurement of consultants, works contracts, and equipment as needed for execution of the works will be managed by the offices of the general manager (procurement) and the general managers (of health care projects) of the IDAP. Although

[4] PC-1 is a standard document used by the government of Pakistan to propose or approve all development projects.

the IDAP has a dedicated and qualified environment specialist deployed under the general manager (quality control) for review and ensuring the quality of environment safeguards documents and monitoring reports prepared by the design and construction supervision consultants, it lacks a dedicated environment and social safeguards management setup, human resources, and expertise for managing environment safeguard requirements of funded projects. To address capacity constraints, it is suggested that the SHC&MED and/or the PIU ensure that qualified environmental safeguard consultants are engaged and mobilized by the IDAP through the design and construction supervision consultants for each COE site. The environment safeguards consultants will ensure timely screening and assessment of safeguard risks.

27. The PIU shall ensure that before any activities are approved for financing under the program, procurement procedures are screened to ensure that asbestos-containing materials are not used or financed under the program (except for the purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20% as provided under the prohibited investment activities in Appendix 5 of the SPS). The PIU should include confirmation of the presence or absence of such materials in its quarterly progress reports and semiannual environmental monitoring reports. In addition to the mentioned requirement, for works on areas of existing buildings which require demolition of existing structures containing asbestos, mitigation measures shall be followed by the PIU and the construction contractor to ensure that removal and disposal of asbestos is in accordance with the defined requirements of best international practice (International Finance Corporation, ADB) indicated in the asbestos management plan. For the Rawalpindi COE site, where the existing TB Center is to be demolished, according to the SPS for projects involving facilities and/or business activities that already exist or are under construction, the PIU will undertake an environment audit, including on-site assessment, to identify past or present concerns related to impacts on the environment. Where noncompliance is identified, a corrective action plan agreed on by ADB and the PIU will be prepared. The plan will define necessary remedial actions, the budget for such actions, and the time frame for resolution of noncompliance. The audit report (including corrective action plan, if any) will be made available to the public in accordance with the information disclosure requirements of the SPS safeguard requirements 1–3.

3. Involuntary Resettlement

28. **Policy and legal framework.** In Pakistan the Land Acquisition Act (LAA) 1894 regulates the land acquisition process and enables the provincial governments to expropriate land and assets for public purposes by exercising the eminent domain principle. The Punjab province, with successive amendments in LAA 1894, has also notified the Punjab Land Acquisition Rules 1983 for implementation of the law. The LAA and rules notified thereunder require publication of preliminary notification for informing the public about acquisition of land for public purpose and allow the executing agency to commence land surveys and demarcation of land required for public purposes. The empowered entity for acquiring land under the LAA is the appointed land acquisition collector or district collector, who, following an impact assessment, determines and awards the compensation for acquired assets including land, structures, crops, and trees in cash at the current market rate including a 15% compulsory land acquisition surcharge to the titled landowners. The salient features of the LAA and a comparative analysis between the LAA and ADB's safeguards policy requirement, including gap-filling measures, are summarized in para. 28and a detailed analysis is provided in the resettlement framework (Annex 8).

29. Desk review of the national legal and policy framework and ADB's safeguards policy requirements revealed several differences between Pakistan's LAA and ADB's SPS. The LAA, in contrast to ADB's SPS, does not require adequate consultation with affected parties; it simply

requires formal declarations and notices be given regarding land plots to be acquired for public purposes. Although the LAA recognizes voluntary land donation and negotiated purchase of land for public purpose, it does not outline mechanisms and procedures for maintaining transparency of the process. The LAA only compensates the titled owners and/or legally recognized land users as per their recorded share and/or interest in the acquired land and/or assets, and it does not provide assistance and support required to restore the lost asset and improve the living standards of marginalized households. The act also does not require preparation of a plan documenting the process and consultations undertaken with affected households. Other gaps include requirement to compensate and assist affected people without legal rights to land; attention to vulnerable groups, Indigenous Peoples, and severely affected people; the importance given to gender issues; monitoring of resettlement implementation; and disclosure of resettlement plans and monitoring reports. Gap-filling measures and actions for identifying impacts; determining eligibility and entitlements; conducting consultations; valuing assets on replacement cost; handling grievances; and preparing, implementing, and monitoring resettlement plans (if needed) are explained in the government endorsed and ADB-accepted resettlement framework prepared for the program.[5] Without mitigations, moderate programmatic risks are perceived from the designed program.

30. **Institutional arrangements.** The ADB funded RBL program will be executed by the SHC&MED of the Punjab. The SHC&MED is establishing a PIU to enhance its capacity for implementing reforms by revamping existing infrastructure as well as planning and preparing new infrastructure development projects. Risks and capacity constraints have been identified in the current institutional setup for handling and managing environmental and social safeguards in a manner consistent with ADB's safeguards requirements (paras. 25–26). For smooth handling and implementation of the program, establishment of a PIU with expert staff including social and environmental safeguards experts is suggested for assisting the SHC&MED in discharging its functions. The PIU will be designated as the implementing agency for the program. With the existing institutional setup, moderate institutional risks are identified, and these will be mitigated by enhancing the safeguards management capacity of the PIU by deploying a social safeguards expert and implementing a capacity development program under ADB. The recommended social safeguards specialist will be hired and deployed in the PIU to ensure resettlement framework provisions are followed during screening and to assess involuntary resettlement impacts, conduct a census of affected and/or displaced people, and consult for timely delivery of requisite social safeguards due diligence documents including resettlement plans for the selected COE sites eligible for interventions under output 2. The expert will supervise and monitor the safeguards implementation progress and prepare and submit social safeguards monitoring reports on a semiannual basis. The TOR for hiring the social safeguards specialist is attached as Appendix 5 of the Resettlement Framework.

31. The SHC&MED conceded that infrastructure development works under output 2 will be executed by the IDAP through its respective offices of general manager (health care projects), established under the chief operating officer of the IDAP. Although a qualified environment specialist is deployed by the IDAP in the office of the general manager (quality control), the human resources and expertise needed for managing social safeguard requirements of the funded health care project are not provided in the general manager (health care projects) office in the IDAP. It is suggested that the SHC&MED) and/or PIU ensure that the office of general manager (health care projects) under the IDAP should engage and mobilize a qualified and experienced social

[5] The resettlement framework is the executing agency's document that can be updated in case of change in scope of the program or in national and policy framework on land acquisition and social safeguards.

safeguards consultant through the design and construction supervision consultant to be engaged by the IDAP for design and construction supervision activities of each COE site. The social safeguards consultant will work in close coordination with the PIU to ensure timely screening and assessment of safeguard risks of the selected COE site, delivery of quality safeguards documents including safeguards screening checklists, due diligence reports, resettlement plans (if needed), and social safeguards monitoring reports. The social safeguards specialist in the PIU will liaise closely with the engineering and technical and safeguards staff and consultants deployed by the IDAP department for each COE office and will provide on-the-job coaching and guidance on handling and managing social safeguard issues and risks that may emerge during execution of the program works. The social safeguards expert will coordinate with the environment safeguards specialist in the PIU for designing and implementing a safeguards capacity building plan for the relevant staff in the implementing agency and/or executing agency and in the office of the general manager (health care projects) under the IDAP and the government entities involved in executing and supervising the civil works for establishing the COEs under output 2.

32. **Indigenous Peoples.** The Punjabi people are the main ethnolinguistic group in the Punjab region, which is shared by India and Pakistan. They are the largest ethnic group of Pakistan. The Punjabi identity is based on language, culture, and geography, rather than religion or historical origin. Integration and assimilation are important parts of Punjabi culture, and Punjabi identity is not based on tribal connections. The other ethnolinguistic groups include the Pashtun, who have migrated to Punjab for better earning opportunities, and Saraiki-speaking (a dialect of Punjabi spoken in the southern part of the province) Baloch people living in the border districts between Punjab and Baluchistan province. The review of the demographic profile of the Punjab province confirmed that there are no people or tribal groups and ethnic minorities claiming themselves as Indigenous Peoples or those having secluded culture or socioeconomic institutions different from the mainstream population or attachment to their ancestral lands or resources in any of the districts of Punjab. Therefore, the program intervention will not impose risks related to Indigenous Peoples safeguards.

4. Programmatic, Institutional, and Contextual Risks

33. **Programmatic and institutional risks.** Programmatic and institutional risks are rated *moderate*. The site selection for construction of COEs will avoid areas prone to natural disasters. All three COE buildings will be designed and constructed in accordance with the seismic design specifications and codes of Pakistan. A climate change risk assessment will be conducted. Climate change adaptation and mitigation measures will be incorporated into facility design. The sites will be in built-up areas, which will not involve critical habitat. There are no social conflict or fragility concerns in Punjab province. While political, governance, and corruption risks exist, they are assessed to be moderate and of limited severity, primarily because of the proposed institutional arrangements of the program. The establishment of a dedicated PIU within the SHC&MED will strengthen program oversight, coordination, and accountability. Program implementation will not require land acquisition, and planned activities under output 2 will be restricted to the government land available within or in proximity of existing tertiary care hospitals in Lahore, Multan, and Rawalpindi. Noticeably, land title disputes and legacy issues are unlikely for Multan and Rawalpindi COE sites, but in the case of Lahore it can't be ascertained because the location of the proposed medical city within the LDA city is government owned land held by the Lahore Development Authority, and land to be allocated for the COE site is not confirmed. The national and provincial legal framework provides a robust mechanism for land acquisition and compensation to the titled or registered landowners and land users. Informal or unregistered land users are not recognized. Based on preliminary assessment, the risk of legacy issues, formal or

informal third-party land use claims, and issues related to restriction of access and vulnerable groups linked to any of the selected COE sites cannot be disregarded. If such impacts are noted on any of the sites considered for COEs, it may impede the successful implementation of program works.

34. The SHC&MED lacks the in-house capacity and necessary human resources for planning, design, and execution of infrastructure development projects and delivering safeguards management activities. A PIU under the special secretary (development and reforms) is being established to address the capacity constraint for revamping existing infrastructure and adding new facilities under the SHC&MED portfolio. Many key expert positions including environmental and social safeguards specialists needed for smooth implementation of the program are not included in the approved structure and PC-1 of the PIU. For the RBL program, it is recommended that the PIU engage requisite expert staff to augment the capacity of the approved PIU. This will include environmental and social safeguards specialists for assisting the SHC&MED and the implementing agency in screening, assessing, and managing environmental and social safeguard risks; conducting safeguards due diligence of all selected COE sites; and implementing safeguards-related program actions in a manner consistent with the outlined provisions of the EARF, Resettlement Framework, and RBL program implementation documents. The SHE&MED will engage the IDAP to establish the COE buildings in Lahore, Multan, and Rawalpindi through its offices of the general manager (health care projects). While the IDAP has one dedicated environment safeguards expert deployed in the office of the general manager (quality control), the respective offices of the general managers (health care projects) lack experts and qualified environmental and social safeguards management staff and proven experience in screening and assessing environmental and involuntary resettlement impacts and preparation, implementation, and monitoring of IEEs, EMPs, and resettlement plans. This capacity risk can be mitigated by ensuring that the respective general managers (health care projects) engage qualified environmental and social safeguards management consultants to support the PIU in conducting safeguards due diligence including preparation and implementation of IEEs and resettlement plans (if needed) for environment and involuntary resettlement category B projects, and delivering periodic environmental and social monitoring reports. Provision for adequate capacity building is built into the program and will be provided through technical assistance support and periodic safeguard monitoring and reporting arrangements to ensure that programmatic and institutional risks are avoided or addressed as per ADB's SPS and RBL policies.

35. **Contextual risk.** The contextual risk is assessed *moderate*. The environmental and social programmatic risks are considered moderate without mitigation. Activities that would be classified category A will be excluded. Legacy or unresolved issues that might affect the commitment and performance of the program are not identified. No recent or ongoing social conflict or social fragility is known or identified for the program. If any of these risks are identified, such project site areas or subprojects will be excluded from the program. There are no known socially sensitive settings that may intensify the likely impacts. The safeguard screening and assessment criteria provided in the PSSA shall be followed. The sites having significant adverse impacts and those with pending legacy issues and/or title disputes will be excluded during screening and assessment of potential risks for finalization of eligible COE sites in Lahore, Multan, and Rawalpindi. There are no known complaints about any of the components of the program or the executing agency's or implementing agency's performance with regard to environment and social safeguards. It is expected that the implementation of the program or any of its components will not expose ADB to significant reputational risk. Risk for Indigenous Peoples is assessed *low*. Indigenous Peoples as defined in ADB's SPS are not present in the program influence area. Hence, there are no Indigenous Peoples safeguards-related contextual risks.

36. The institutional, programmatic, and contextual risks are assessed *moderate* and *manageable*. Through proper building design, appropriate capacity building, additional staff resources, establishment of procedures, institutional arrangement, and monitoring, such risks can be reduced and managed.

D. Safeguard Program Actions

37. Based on the assessment findings, safeguard related actions are proposed in the PAP to address the gaps and mitigate the identified risks. In general, there is a need for further strengthening of the existing safeguards capacity of the dedicated PIU to be established by the SHC&MED for the program, particularly relating to SPS requirements. The PIU/implementing agency will have to hire environmental and social safeguards specialists dedicated to the proposed RBL program to ensure regular monitoring of environmental and social compliance, conduct meaningful public consultations, and effectively handle safeguard concerns of affected people. Further, capacity building through training on environmental and social safeguards aspects is necessary. Progress in implementing these actions will be audited by ADB during the program implementation.

38. **Environmental and social safeguards-related program actions and documentation.** For the RBL program, the PSSA document has been prepared to ensure all ADB safeguard policy principle requirements for environmental and social safeguards issues are fulfilled during the program activities. After ADB's approval, the PSSA document should be disclosed on the ADB website to meet both ADB's safeguard principles and compliance with national regulations. To address program implementation gaps, the EARF will guide the SHC&MED in screening and assessing adverse environmental impacts, provide specific guidelines for preparing the IEEs required by national legislation, as well as preparing the SSEMPs meeting ADB's SPS principles and conduct public consultations before and during the physical works. Related mitigations should be incorporated into the bill of quantities and contracts. The list of required permits and approvals, instructions on performance of environmental monitoring and supervision, as well as guidelines for establishing and operating the program GRM are also included in the EARF. The framework is a living document and will be updated as necessary.

39. There is no declared social safeguards policy at national or provincial level, and the acquisition of land and assets for public interest projects is governed under the Land Acquisition Act 1984 and Punjab Land Acquisition Rules 1983. In case acquisition of land will be required, the SHC&MED will follow these legal instruments. The land acquisition laws that govern the eminent domain principle and its implementation practices are not consistent with the IR requirements outlined in ADB's SPS. To address implementation gaps, a resettlement framework is prepared to guide the PIU/implementing agency in screening and assessing adverse social impacts as well as preparing, implementing, and monitoring the required social safeguards management instruments to address potential IR impacts from the designed interventions under the program.

40. **Establishment of institutional setup.** It is recommended that the SHC&MED establish a dedicated PIU for the ADB funded program. The PIU will include dedicated and qualified environment and social safeguards management staff for effective safeguards management and ensuring compliance with the legal framework and ADB's safeguards policy requirements. The SHC&MED will ensure that clear arrangements are in place with third parties or other implementing agencies regarding the applicability of the SPS and the agreed resettlement framework. The safeguards experts of the PIU will closely liaise with the safeguards experts and engineering staff engaged for design and supervision of construction works by the respective

office of the general manager (health care projects), the IDAP for streamlining the safeguards management activities at the level of service provider, and entities engaged for execution of works for establishing the COEs under output 2 of the program. The PIU safeguards staff will guide and supervise the counterpart staff mobilized by the general manager (health care projects) and the IDAP to ensure effective implementation of the required safeguard compliance instruments and compilation and timely delivery of safeguards implementation progress through program implementation progress reports.

41. **Environmental and social safeguards screening and planning**: The safeguard staff in the PIU will support environmental safeguards risk screening for selection of eligible COE sites using ADB environmental screening checklists and will be responsible for preparing, implementing, and monitoring quality safeguards-related documents before commencing the planned and designed physical activities. After screening and categorization, the IEEs for category B projects will be prepared by the PIU in accordance with the Guidelines for the Preparation and Review of Environmental Reports and ADB SPS, and approval will be obtained from the EPA Punjab in accordance with IEE/EIA regulations 2022 and the Punjab Environmental Protection Act 2012 (Delegation of Powers for Environmental Approvals) Rules, 2017. EMPs should become part of the bidding documents and be incorporated into the civil works contracts, assigning primary responsibility for implementation to contractors under the oversight of the PIU, respective office of the general manager (health care projects), IDAP, and the construction supervision consultants to be engaged.

42. The resettlement framework provisions will be followed for screening and assessment of social safeguard (involuntary resettlement and Indigenous Peoples) impacts and formulation of appropriate safeguard planning and implementation instruments including resettlement plans by the social safeguard's expert staff in the PIU. Except for sites involving significant, diverse, and unprecedented involuntary resettlement and Indigenous Peoples impacts, all sites will be eligible for designed interventions under the RBL program. The social safeguard staff in the PIU will support involuntary resettlement and Indigenous Peoples safeguards risk screening, assessment of involuntary resettlement impacts that could be likely for selected sites considered eligible for establishing the COEs. In case potential involuntary resettlement impacts are noted, the safeguards staff will conduct census of displaced people experiencing loss of their assets and access to income sources established on public or government land, socioeconomic and gender analysis of affected households, and meaning full consultations with the stakeholders for the COE sites having potential involuntary resettlement impacts, and subsequently will ensure preparation, implementation, and monitoring of the resettlement plans and delivery of quality semiannual social safeguards reports and resettlement plans compliance reports as needed.

43. The safeguards-related database will be maintained for monitoring and evaluation of the safeguards compliance status by the PIU. In this regard, the environmental and social safeguards experts will support the PIU's monitoring and evaluation staff to maintain safeguards-related information and data which should be easily accessible for monitoring and evaluation of safeguards compliance.

44. **Awareness raising and safeguards capacity building.** Smooth and effective implementation of program intervention in a manner consistent with the PSSA requirements and preparation of quality IEEs and EMPs and the social safeguards due diligence documents including resettlement plans as needed can be achieved through raised awareness on safeguards requirements and building capacity of the concerned staff deputed by the PIU and the implementing partner for design and construction supervision of the COEs. Therefore, the environmental and social safeguards experts engaged in the PIU will prepare and implement an

awareness raising program for improved understanding about the potential environmental and social safeguards risks, environmental and involuntary resettlement requirements and mitigation measures, preparation of IEEs including EMPs and resettlement plans (if needed), incorporation of EMP provisions into bidding documents for smooth implementation of EMPs, and construction monitoring. The PIU safeguards team will develop and execute the safeguards capacity development program and provide on-the-job coaching to assigned safeguards and construction supervision staff deployed by the implementing partner for each COE site. As part of the training program, handbooks, checklists and safeguards compliance monitoring templates and procedures for registering review and resolution of grievance through the project-based GRM will be prepared in English and Urdu language and distributed among the implementers. ADB will provide capacity development support through ongoing technical assistance.

45. **Public consultation and disclosure.** It is recommended that public consultation be carried out during the early stages of the program commencement and throughout the program implementation to address any environmental and social issues that affect the local communities. It is important that consultations with stakeholders occur at an early stage of program preparation and implementation. As a minimum, stakeholders will be consulted regarding the scope of the environmental and involuntary resettlement safeguards due diligence requirements before work has commenced and will then be informed about the likely impacts of the proposed activities and proposed mitigation once the draft national IEEs and/or the draft resettlement plans (if so required) are under preparation. The report will record the views of stakeholders and indicate how these have been considered in project development. There is a variety of approaches for such contacts, including public meetings, focus group discussions, workshops, public information campaigns,., and several methods will be used to reach all sectors of society, as well as institutional stakeholders, nongovernment organizations, and others.

46. Information will be disclosed through public consultations, and more formally by making documents and other materials available in a form and at a location easily accessible by stakeholders. This will involve making draft reports available at public locations in the town(s) and providing a mechanism for the receipt of comments and making documents available more widely by lodging them on the ADB and SHC&MED websites. The contact information, information on the GRM, as well as national IEEs, EMPs, SSEMPs, resettlement plans, and periodic safeguards monitoring reports will be disclosed on the SHC&MED website.

47. **GRM.** Assessment of the institutional setup revealed that a formal GRM with designated focal points does not exist in the PIU of the SHC&MED. This PSSA suggests that a two-tier GRM be established for the program. The first tier will be established at the COE level by notifying a COE grievance redress committee in the COE office to be established by the respective general manager (health care projects) at the COE level. This first tier grievance redressal committee (GRC), headed by the site manager in the camp office of the implementing partner, will include a designated representative of the SHC&MED from a linked teaching hospital, PIU safeguard staff, and technical and construction supervisors and safeguards management staff from the office of the respective chief engineer (building) in Lahore, Multan, and Rawalpindi. The second tier of the GRM will be established by notifying a program GRC (P-GRC) in the PIU established at the implementing agency and/or executing agency level by the SHC&MED. The P-GRC headed by the program director will include representatives of the SHC&MED, PIU technical/engineering staff, and safeguards staff as its members. The environmental and social safeguards specialists in the PIU will act as focal points for registering the environmental and social safeguards-related complaints and maintain the GRC proceedings and record social safeguards-related complaints and grievances filed, and redress these through the P-GRC at the PIU level. The proposed multi-tier GRM with complaints flow mechanism for the program is provided in Annex 8 and is

considered in detail in the EARF and Resettlement Framework enclosed in the PSSA as Annexes 6 and 7.

48. **Commitment to agreed program actions and safeguards measures.** The PSSA, including the identified safeguards-related program actions, was thoroughly discussed and agreed upon with the SHC&MED during program preparation. The SHC&MED has demonstrated strong commitment to implementing all agreed actions outlined in the PAP, confirmed its full endorsement of the PAP, and committed to executing all proposed actions within the defined timelines. The SHC&MED has also confirmed its readiness to put in place the required institutional arrangements—such as the establishment of a dedicated PIU—to ensure that all safeguards-related measures are effectively implemented and monitored throughout the program lifecycle.

LIST OF ANNEXES

1. Rapid Environmental Assessment Checklist (REA Checklist)
2. Involuntary Resettlement Impact Categorization Checklist
3. Safeguards Program Action Plan (PAP)
4. Safeguard Policy Principles Triggered
5. Environmental and Social Safeguards (IR&IP) Risk Assessment and Consultation Report
6. Environmental Assessment and Review Framework (EARF)
7. Resettlement Framework (RF)
8. Proposed Multi-Tier GRM with complaints flow mechanism for PNHWRP RBL

ANNEX 1: RAPID ENVIRONMENTAL ASSESSMENT (REA) CHECKLIST – BUILDINGS

Country/Project Title:

Investment Title:

Sector Division: **Buildings**

Date:

Screening Questions	Yes	No	Remarks
A. Investment Siting **Is the Investment area adjacent to or within any of the following areas?**			
▪ **Underground utilities**			
▪ **Cultural heritage site**			
▪ **Protected area**			
▪ **Wetland**			
▪ **Mangrove**			
▪ **Estuarine**			
▪ **Buffer zone of protected area**			
▪ **Special area for protecting biodiversity**			
▪ **Bay**			
B. Potential Environmental Impacts **Will the Investment cause…**			
▪ Encroachment on historical/cultural areas?			
▪ Encroachment on precious ecology (e.g. sensitive or protected areas)?			
▪ Impacts on the sustainability of associated sanitation and solid waste disposal systems?			
▪ Dislocation or involuntary resettlement of people?			
▪ Disproportionate impacts on the poor, women and children, Indigenous Peoples, or other vulnerable groups?			
▪ Accident risks associated with increased vehicular traffic, leading to loss of life?			
▪ Increased noise and air pollution resulting from increased traffic volume?			
▪ Occupational and community health and safety risks?			
▪ Risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during construction and operation?			
▪ Generation of dust in sensitive areas during construction?			
▪ Requirements for disposal of fill, excavation, and/or spoil materials?			
▪ Noise and vibration due to blasting and other civil works?			
▪ Long-term impacts on groundwater flows as result of needing to drain the investment site prior to construction?			
▪ Long-term impacts on local hydrology as a result of building hard surfaces in or near the building?			

Screening Questions	Yes	No	Remarks
▪ Large population influx during construction and operation that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)?			
▪ Social conflicts if workers from other regions or countries are hired?			
▪ Risks to community safety caused by fire, electric shock, or failure of the buildings' safety features during operation?			
▪ Risks to community health and safety caused by management and disposal of waste?			
▪ Community safety risks due to both accidental and natural hazards, especially where the structural elements or components of the investment are accessible to members of the affected community or where their failure could result in injury to the community throughout construction, operation, and decommissioning?			

ANNEX 2: INVOLUNTARY RESETTLEMENT IMPACT CATEGORIZATION CHECKLIST

Involuntary Resettlement Impacts Screening Checklist for PN&HWR-RBL Program

A: Basis Information about Proposed COE site		
Name of the COE for nursing	-	_____
Name of linked teaching Hospital	-	_____
Site Coordinates	-	N_____ E_____
Location	-	Town/Village: _____
	-	Tehsil _____District_____

B: Assessment of land availability and its ownership status.

1. How much land is owned/occupied by the tertiary care hospital selected as teaching hospital by establishing the COE for nursing education?

_____ Acre,	_____ Kanal	_____Marla

2. How much is covered area of existing hospital building and how much area is vacant and available within the precincts of selected teaching hospital for construction of the COE?

Total covered area: _____square feet.	Total Open area_____ square feet.

3. Is the allocated and occupied land by the hospital owned by the SHC&MED or any other entity of provincial or federal government? Tick mark the relevant.

SHC&MED Owned government land _____	Government Land allocated for other provincial department _____	Land owned/occupied by Federal Government _____

4. In case, vacant land was not available within the periphery of teaching hospital, how the land required for establishing the COE was secured nearby the selected teaching hospital? Tick mark the relevant.

_____: Allocating government land to SHC & MED	_____: Voluntary land donation by community	_____: By acquiring under LAA 1894.

5. Is the allocated government land, donated or acquired land for teaching hospital or medical education facility mutated in the name of SHC&MED or the hospital or other government entity?

Yes_____, No_____, not known_____

6. If answer to Q-5 is yes, who is the titled owner of land allocated for establishing the COE nursing education in close proximity of teaching hospital? Tick Mark the relevant.

_____: SHC&MED	_____: Other government entity	_____: Teaching Hospital/COE Nursing

7. Is any of the title documents below available which can be presented for confirming claimed land title/ ownership status? Tick Mark the relevant.

_____: Fard-Malkiat/Mutation Certificate.	_____: Sanctioned allocation/allotment.	_____: Executed Donation Deed.	_____:Purchase Registry.

8. Is the pending mutation of land occupied by hospital school is because of the title dispute or unresolved legacy issue? Tick mark the relevant.

	_____,: Dispute on land title	_____,: Pending legacy issue	_____: Unknown

C: Probable Involuntary Resettlement Effects (Please elaborate in the Remarks column)	Yes	No	Not Known	Remarks
C-1: Involuntary Acquisition of Land				
1. Will there be land acquisition?				
2. Is the size for required land parcel and site for land acquisition known?				
3. Is the ownership status and current usage of land to be acquired known?				
4. Will easement be utilized within an existing right of way (ROW)?				
5. Will there be loss of shelter and residential land due to land acquisition?				
6. Will there be loss of agricultural and other productive assets due to land acquisition?				
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?				
8. Will there be loss of businesses or enterprises due to land acquisition?				
9. Will there be loss of income sources and means of livelihoods due to land acquisition?				
C-2 Voluntary Donation of Land (Questions below may be responded and elaborated in remarks column in case of voluntary land donation.)				
10, Will the community or land owner household voluntarily donate required land?				
11 Is the community (for communal land type) and/or the joint owners of the titled land support and endorse the donation of land for school purpose?				
12. Is the size of land parcel to be donated and total land owned by the donor Known?				
13. Is the land type and its established usages i,e, (residential/commercial, agricultural or uncultivable waste land) known?				
14. Will the donation of titled land or communal land result in loss of shelter for the donar or any other user of the land to be donated?				
15. Will the land donation result in significant loss of cultivable and productive land that can adversely affect the income and living standard of the donor household?				
16. Will ne donation of land result in loss of crops or other established income sources on the land parcel to be donated?				
17. Will the donated land mutated in the name of the SHC&MED prior to				

selection of site for any intervention under PN&HWR—RBL Program				
C-3: Involuntary Restrictions on Land Use or on Access to Legally Designated Parks/Protected Areas				
18. Will people lose access to natural resources, communal facilities and services?				
19. If land use is changed, will it have an adverse impact on social and economic activities?				
20. Will access to land and resources owned communally or by the state be restricted?				
21. Will the restricted access to and use of communal/state owned land will result in loss of shelter or established productive assets?				
D: Information about tentative number of affected/displaced Persons:				
Any estimate of the likely number of persons that will be affected/displaced by the Subproject? *[ ] No [ ] Yes* *If yes, approximately how many? _____Not Applicable _____*				
Are any of them poor, female heads of households, or vulnerable to poverty risks? *[ ] No [ ] Yes*				
Are any displaced persons from indigenous or ethnic minority groups? *[ ] No [ ] Yes*				
E: Recommended and **Approved**				
Prepared by: **Safeguards Specialist** **PIU for PN&HWR-RBL program** **Date:_____**	**Recommended by:** **Program Manager** **PIU PN&HWR-RBL program** **Date:_____**	**Confirmed /Endorsed by IA. i.e.** **Project Director** **PIU, SHC&MED** **Date:_____**		

ANNEX 3: SAFEGUARDS PROGRAM ACTION PLAN

Issue	Proposed Action	Indicator	Responsibility	Timing
Environmental Safeguards:				
Institutional setup with safeguards management capacity in place. Environmental Safeguards management tools and framework developed and adopted.	• It is recommended that SHC&MED will establish a dedicated Program Implementation Unit (PIU) for the ADB funded PN&HWR-RBL Program. The PIU for PN&HWR-RBL Program will include dedicated and qualified full-time environmental safeguards management experts for supporting the EA and IA in SHC&MED at provincial level for effective safeguards management and ensure compliance with the legal framework and ADB's safeguards policy requirements. • The Infrastructure Development Authority of Punjab (IDAP), as the service provider, should engage a qualified environmental safeguards management consultant to ensure effective planning, implementation, and monitoring of safeguard measures at all Centers of Excellence (COE) sites • An environmental assessment review framework (EARF) including guiding principles and tools for screening, assessment and managing environmental risks developed and adopted.	• PIU including dedicated environmental safeguards staff established and operational. • Engagement of Qualified Environmental Safeguard Consultant in IDAP • The EA/IA endorsed and adopted EARF for the RBL.	EA/IA EA/IA	Prior to RBL loan effective date.
Hazardous materials/asbestos Risk Management	Asbestos Management Plan will be prepared if asbestos risk (e.g., Rawalpindi site) exists according to the environmental assessment review framework (EARF).	Asbestos Management Plan prepared and endorsed by the environmental safeguards specialist, PIU	EA/IA	During pre-construction/Pre-demolition of existing facilities.
Environmental safeguards management capacity building of the PIU of SHC&MED, and service provider (IDAP).	• Capacity building trainings in environmental safeguards for PIU of SHC&MED and IDAP through the ongoing TA developed and implemented, covering (i) environmental risk screening and categorization using the rapid assessment checklist; (ii) preparation of IEE and its approval from Punjab EPA ; (iii) incorporation of EMP along its detailed cost into bidding documents and construction	• Understanding and capacity of PIU environmental expert, focal points and COEs about safeguards management requirements enhanced.	IA and Environmental Safeguards Staff in PIU	In parallel with selection and finalization of eligible school sites and centralized design of planned activities.

	contracts and implementation of EMP; and (iv) construction monitoring.	• Obtaining No objection certificates (NOCS) from Punjab EPA		
Establishment of GRM	• A fully operation two-tiered GRM will be established and grievance redress committees at SHC&MED / PIU and COEs will be notified. • The TORs explaining the GRCs functions and mandate will be circulated. • Complaints and grievances will be registered, reviewed, and redressed by the GRM, with a target of resolving at least 80% of cases within 30 calendar days. The status and performance of the GRM will be reported in the semiannual safeguards monitoring reports	• GRC notified and operational at PIU and COEs	EA/IA and the COEs	Before the effective date of RBL loan and continue during program execution period.
Monitoring & MIS	Development of a simple safeguards digital information system for uploading IEEs, EMPs, GRM logs.	Safeguards MIS developed and IEEs, EMPs, GRM logs uploaded	IA and Environmental Safeguards Staff in PIU	During program execution period.
Social Safeguards:				
Institutional setup with safeguards management capacity in place. Social Safeguards screening and assessment checklists and resettlement framework developed and adopted.	• The SHC&MED will ensure establishment of a dedicated Project Implementation Unit for serving as Implementing Agency (IA) for the ADB financed PN&HWR—RBL program. The required expert staff including social safeguards expert for supporting the IA/EA in implementation of the PN&HWR—RBL program recruited and deployed in the PIU. • A resettlement framework including guiding principles and tools for screening, assessment and managing IR risks developed and adopted.	• PIU, including dedicated social safeguards staff established and operational. • The EA/IA endorse and adopt the RF for the RBL.	EA/IA EA/IA	Prior to RBL loan effective date.
Development of safeguards management capacity of the relevant safeguards and technical staff deputed by PIU and the service provider i.e. IDAP for design, execution and supervision of the civil works at	• The focal staff responsible for social safeguards management and monitoring for each COE site designated by PIU and the service provider i.e. IDAP. • Capacity building trainings on social safeguards requirements for PIU of	• Focal staff with social safeguards management responsibility designated for each COE.	PIU and service provider i.e. IDAP Social safeguards	In parallel with selection of eligible COE sites and finalization of the site-specific design for

each COE site. service provider i.e. IDAP	SHC&MED and IDAP through the ongoing TA developed and implemented. The training may include modules on (i) social safeguards risk screening and IR impacts assessment; (ii) preparation and implementation of RPs, (iii) handling of social safeguards-related grievances, review and monitoring of safeguards compliance status; and (iv) preparation of periodic safeguards monitoring reports and compliance reports.	• Understanding and capacity of social safeguards staff deployed in PIU and service provider i.e. IDAP and the designated focal staff by PMI/PIU and IDAP for safeguards management at COE level enhanced.	staff of PIU/ IA & service provider i.e. IDAP	establishing the COEs at each selected site.
IR risk assessment and preparation of social safeguards documents including RPs commensurate with the identified and assessed social risks and potential IR impacts.	• In parallel with detailed design IR risk screening and assessment will be conducted and completed for each selected COE site and based on noted risks and IR impacts social safeguard documents including RPs will be delivered. • Compliance with social safeguards requirements will be monitored and semiannual monitoring reports will be prepared and delivered	• Social safeguard risk assessment and due diligence reports and RPs (if needed) prepared and disclosed for each relevant COE site. • Semiannual social monitoring reports delivered and disclosed.	IA/EA -do-	Before commencing the planned and designed physical activities.
Establishment of GRM	• A fully operation two-tiered GRM will be established by notifying and operationalizing grievance redress committees at PIU/SHC&MED level and at COEs' level. • The TORs explaining the GRCs functions and mandate will be circulated. • Social safeguards-related complaints and grievances registered, reviewed and redressed by the GRM and status reported in semiannual safeguard monitoring reports.	• GRC notified and operational at PIU/SHC&MED Level and COE Level.	EA/IA and the service provider i.e. IDAP.	Before effective date of RBL loan and continue during program execution period.

ANNEX 4: SAFEGUARDS POLICY PRINCIPLES TRIGGERED

Principles	Description
Environment	
Principle 1: Use a screening process for each proposed project, as early as possible, to determine the appropriate extent and type of environmental assessment so that appropriate studies are undertaken commensurate with the significance of potential impacts and risks.	There is no significant gap between national/provincial legislation and ADB SPS requirements in using a screening process. All projects are screened and categorized by the Punjab Nursing and Health Workforce Reform Program (PN&HWRP) RBL program IA-PIU to be established by the SHC&MED according to the Punjab Environmental Protection Act (PEPA) 2012, Section 12 along with the Punjab Environmental Protection (Review of IEE/EIA) Regulations 2022, Schedule I and Schedule II and the Punjab Environmental Protection Act 2012 (Delegation of Powers for Environmental Approvals) Rules, 2017 as early as possible, to determine the appropriate extent and type of environmental assessment and according to the rapid environmental assessment (REA) checklist (general) of ADB to ensure appropriate environmental category is assigned. For Rawalpindi COE site where existing TB Center should be demolished, according to the SPS 2009 for projects involving facilities and/or business activities that already exist or are under construction, the borrower/client will undertake an environment audit, including on-site assessment, to identify past or present concerns related to impacts on the environment. For environmental safeguards, activities classified category A under the Safeguard Policy Statement are ineligible for financing through RBL.
Principle 2: Conduct an environmental assessment for each proposed project to identify potential direct, indirect, cumulative, and induced impacts and risks to physical, biological, socioeconomic (including impacts on livelihood through environmental media, health and safety, vulnerable groups, and gender issues), and physical cultural resources in the context of the project's area of influence. Assess potential trans boundary and global impacts, including climate change. Use strategic environmental assessment where appropriate.	There is no significant gap between national/provincial legislation and ADB SPS requirements in conducting environmental assessment. The national environmental assessment requirements are less rigorous concerning climate change effects, strategic environmental assessment, and cumulative assessment. Environmental category will be assigned to each subproject based on the screening results conducted by the IA-PIU to be established by the SHC&MED. Projects with significant environmental impacts (Schedule II) will be excluded from the program. Projects with moderate impacts are expected to trigger the need to conduct environmental assessments and prepare a national IEE. In accordance with the Punjab Environmental Protection Act 2012 (IEE/EIA Regulations 2022, Schedule I, Subsection I, where the preparation of IEE will be required for establishment of COE as well as obtaining of approval from Environmental Protection Agency (EPA Punjab). IA-PIU will prepare the national IEE in accordance with the "Guidelines for the Preparation and Review of Environmental Reports", November 1997 (Government of Pakistan), Section 2.3 – Format of the IEE.
Principle 3. Examine alternatives to the project's location, design, technology, and components and their potential environmental and social impacts and document the rationale for selecting the particular alternative proposed. Also consider the no project alternative.	There is no gap between national/provincial legislation and ADB SPS requirements in examining alternatives. No additional action required. Examination of alternatives will be done according to the national "Guidelines for Preparation and Review of Environmental Reports", Government of Pakistan, 1997, Section 2.6 – Generating Alternatives, according to which the alternatives will be examined to the project's location, design, technology, components, and their potential environmental and social impacts, and document the rationale for selecting the particular alternative proposed. Also, the "no-build" alternative shall be considered.

Principle 4: Avoid, and where avoidance is not possible, minimize, mitigate, and/or offset adverse impacts and enhance positive impacts by means of environmental planning and management. Prepare an EMP that includes the proposed mitigation measures, environmental monitoring and reporting requirements, related institutional or organizational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators. Key considerations for EMP preparation include mitigation of potential adverse impacts to the level of no significant harm to third parties, and the polluter pays principle.	EMP as separate environmental instrument is not required according to the Punjab Environmental Protection (Review of Initial Environmental Examination and Environmental Impact assessment) Regulations 2022 and Guidelines for the Preparation and Review of the Environmental Reports, Government of Pakistan 1997. Instead, the EMP is integrated within the IEE or EIA report and serves as a basis for environmental approval, monitoring, and compliance. EMPs for construction works should be prepared according to the ADB provided template, and the related line items in the works contracts included. The EMPs will be expanded to site-specific EMPs (SSEMPs) based on the final design by the contractors before commencement of construction works. SSEMPs will be reviewed and endorsed by the Supervision Consultant's and approved by the IA – PIU environmental specialist. SSEMPs should be supervised and monitored during construction by the Supervision Consultant and IA - PIU environmental specialist. Training sessions on EMP as an independent plan aligned with tender and contract processes should be conducted by TA consultant to meet ADB requirements.
Principle 5: Carry out meaningful consultation with affected people and facilitate their informed participation. Ensure women's participation in consultation. Involve stakeholders, including affected people and concerned nongovernment organizations, early in the project preparation process and ensure that their views and concerns are made known to and understood by decision makers and taken into account. Continue consultations with stakeholders throughout project implementation as necessary to address issues related to environmental assessment. Establish a GRM to receive and facilitate resolution of the affected people's concerns and grievances regarding the project's environmental performance.	Effective public consultation is mandatory in national IEE/EIA process according to the "Guidelines for the Preparation and Review of the Environmental Reports, Government of Pakistan 1997 and Punjab Environmental Protection (Review of Initial Environmental Examination and Environmental Impact assessment) Regulations 2022. No gaps regarding the meaningful consultations with this principle. On the contrary, there is a significant gap between the national legislation and ADB SPS requirements regarding the grievance redress mechanism (GRM). According to the national legislation, there is no convenient GRM except recourse of appeal to formal administrative jurisdiction or the court of law. Affected parties will be consulted in a meaningful manner, in accordance with the requirements of national law (Punjab Environmental Protection (Review of Initial Environmental Examination and Environmental Impact assessment) Regulations 2022) and ADB SPS 2009, as part of the project design and implementation process. Consultation will be conducted throughout the design, construction, and operation phases, to address any environmental issues that may arise. EA/IA will establish an easily accessible two-tier grievance redress mechanism available throughout project implementation that will be widely publicized within respective subproject areas and amongst the affected persons. A two-tier program GRM will be established involving IDAP/PIU as 1st tier GRM (COE level GRC) in districts and SHC&MED/PIU as 2nd tier GRM.
Principle 6: Disclose a draft environmental assessment (including the EMP) in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. Disclose the final environmental assessment, and its updates if any, to affected people and other stakeholders.	There is no significant gap between national legislation and ADB SPS requirements with this principle. According to Rule 12 (Decision) and 13 (Conditions of approval) of Punjab Environmental Protection Agency (Review of IEE/EIA) Regulations, 2012 the IEE will not usually require public advertisement and comment, but it remains publicly accessible document, available to any person who wishes to inspect it at the offices of the Responsible Authority.

	The national draft and final IEEs/EMPs will be disclosed to affected persons, posted in the Executing Agency - SHC&MED and IA - PIU websites for public disclosure.
Principle 7: Implement the EMP and monitor its effectiveness. Document monitoring results, including the development and implementation of corrective actions, and disclose monitoring reports.	There is no gap related to implementing and monitoring of EMP. According to the national legislation (Guidelines for Review of IEE/EIA 1997) a management system for monitoring, reporting and responding to complaints should be established, with appropriate data storage, retrieval and access, and reporting intervals. Issues arising from regular reporting should be reviewed, and preventative and remedial measures taken. The EMP should be updated regularly and an independent audit undertaken. According to the Rule 19 (Monitoring) and 20 (Cancellation of approval) of Pakistan Environmental Protection Agency (Review of IEE/EIA) Regulations, 2022, there is a gap between national and ADB SPS requirements concerning the disclosure of monitoring reports, as there is no specific requirement under the national law to disclose monitoring reports. The SHC&MED IA-PIU will ensure subprojects monitoring programs include requirements and procedures for disclosure. Monitoring reports will be produced and posted on the RBL program EA/IA websites. Annual and/or Semiannual Environmental Monitoring Reports (SAEMR's) will also be posted on ADB website. IA-PIU will also ensure incorporation of EMPs into the bill of quantities in the bid documents and contracts.
Principle 8: Do not implement project activities in areas of critical habitats, unless (i) there are no measurable adverse impacts on the critical habitat that could impair its ability to function, (ii) there is no reduction in the population of any recognized endangered or critically endangered species, and (iii) any lesser impacts are mitigated. If a project is located within a legally protected area, implement additional programs to promote and enhance the conservation aims of the protected area. In an area of natural habitats, there must be no significant conversion or degradation, unless (i) alternatives are not available, (ii) the overall benefits from the project substantially outweigh the environmental costs, and (iii) any conversion or degradation is appropriately mitigated. Use a precautionary approach to the use, development, and management of renewable natural resources.	There is a significant gap between national legislation and ADB SPS 2009 requirement concerning critical habitats. According to the National Laws (e.g., NCS 1992, PEPA 1997), the NCS prioritizes biodiversity as one of its core areas but lacks specific implementation mechanisms. Pakistan Environmental Protection Act (PEPA) addresses environmental degradation but does not explicitly prioritize biodiversity conservation. Weak enforcement and limited focus on habitats critical to species conservation. The site selection for civil works avoids development within protected areas (e.g., national parks, wildlife sanctuaries) in accordance with Pakistan's laws and regulations. While this significantly reduces the likelihood of encountering critical habitats, it does not eliminate the risk entirely, as critical habitats may also exist outside protected areas. A preliminary biodiversity screening using the Integrated Biodiversity Assessment Tool (IBAT) will be conducted for the candidate sites to ensure that no critical habitats are present in the proposed locations. No activities shall be conducted in critical habitats as defined in ADB's SPS or protected areas screened since they will likely fall into category A, which is not permitted under the ADB RBL program.
Principle 9: Apply pollution prevention and control technologies and practices consistent with international good practices as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health and Safety Guidelines. Adopt cleaner production processes and good energy efficiency practices. Avoid pollution, or, when avoidance is not possible, minimize or control the intensity or load	This is regulated by section 11 of "Prohibition of certain discharges and subsequent Punjab Environmental Quality Standards", according to which there is no significant gap between national, provincial and ADB SPS 2009 requirements. ADB requires the adaptation of the more stringent requirements between international standards and government regulations. IA will apply pollution prevention and control technologies and practices consistent with international good practices.

of pollutant emissions and discharges, including direct and indirect greenhouse gases emissions, waste generation, and release of hazardous materials from their production, transportation, handling, and storage. Avoid the use of hazardous materials subject to international bans or phase-outs. Purchase, use, and manage pesticides based on integrated pest management approaches and reduce reliance on synthetic chemical pesticides.	
Principle 10: Provide workers with safe and healthy working conditions and prevent accidents, injuries, and disease. Establish preventive and emergency preparedness and response measures to avoid, and where avoidance is not possible, to minimize adverse impacts and risks to the health and safety of local communities.	There is no significant gap between national legislation and ADB SPS 2009 requirements concerning occupational health and safety on work sites. OHS is regulated by the Punjab Occupational Safety and Health Act, 2019. Contractors should consider site-specific hazards and prepare appropriate management plans to avoid, minimize or mitigate risks to workers and the public. The construction H&S requirements should be included in the EMP as well as in the bid documents and contracts.
Principle 11: Conserve physical cultural resources and avoid destroying or damaging them by using field-based surveys that employ qualified and experienced experts during environmental assessment. Provide for the use of “chance find” procedures that include a pre-approved management and conservation approach for materials that may be discovered during project implementation.	There is no significant gap between national legislation and ADB SPS 2009 requirements concerning the conservation of physical and cultural resources. Conservation of physical cultural resources is regulated by the National Conservation Strategy Pakistan, 1992, Pakistan Antiquities Act 1975 & Punjab Antiquities Amendment Act 2012 along with NCS 1995. Not triggered. RBL program is unlikely to affect any cultural resources. Screening procedure will include provisions to exclude any project that will affect any cultural, historical, religious, regional and/or national heritage. A chance find procedure will also be made part of IEE study to guide the contractor on actions to be taken in case of finding a potential artifact.
Involuntary Resettlement	
Principle 1: Screen the project early on to identify past, present, and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through a survey and/or census of displaced persons, including a gender analysis, specifically related to resettlement impacts and risks.	National and Provincial legal framework does not correspond to this principle. For bridging the gap, the Project Implementation Unit within IA/EA in coordination with implementing partner will conduct IR screening and risk assessment for all candidate sites selected for establishing the COEs. It will confirm the title of available/allocated land, determine the need for acquisition of additional land and assess potential IR risks that could be likely due to land acquisition or restriction of access to government/public land and clearance of assets including improvements made by the formal or informal land users. The scope of resettlement planning will be determined by the PIU through impact assessment surveys, census of displaced persons, socioeconomic assessment including gender analysis of the households experiencing the resettlement impacts due to loss of assets and access to income sources.
Principle 2: Carry out meaningful consultations with affected persons, host communities, and concerned nongovernment organizations. Inform all displaced persons of their entitlements and resettlement options. Ensure their participation in planning, implementation, and monitoring and evaluation of resettlement programs.	Except for providing an opportunity for hearing of interested persons/parties facing loss of their assets due to expropriation of land, consultations with all stakeholders are not required under the law i.e. Land Acquisition Act 1894 and Punjab Land Acquisition Rules of 1983. To address this gap, the key stakeholders including formal/informal users of EA/IA owned land or public/government land (allocated for establishing COEs), neighborhood communities, and inline government entities will be consulted for informing the overall program objectives and compiling information about resettlement impacts with appropriate

	mitigations. Consultation, participation and information disclosure strategy is included in the Resettlement Framework (RF) that will be followed to ensure continued consultation throughout program implementation. A two-tier program GRM will be established to respond to concerns and complaints of the stakeholders.
Principle 3: Improve, or at least restore, the livelihoods of all displaced persons through (i) land-based resettlement strategies when affected livelihoods are land-based where possible or cash compensation at replacement value for land when the loss of land does not undermine livelihoods, (ii) prompt replacement of assets with access to assets of equal or higher value, (iii) prompt compensation at full replacement cost for assets that cannot be restored, and (iv) additional revenues and services through benefit sharing schemes where possible.	The legal framework only allows the compensation computed in a manner explained in the law to titled owners and registered users of the affected assets. In case of impacts that may result in economic or physical displacement, a resettlement plan (RP) will be prepared as a gap bridging measure to compensate for acquired land/assets on full replacement cost basis and assist the physical and/or economically displaced persons (DPs) to relocate their assets/income sources at alternate locations and restore living standards and livelihoods as per the eligibility criteria and entitlement provisions explained in the resettlement framework (RF) included in PSSA prepared for the program.
Principle 4: Provide physically and economically displaced persons with needed assistance, including the following: (i) if there is relocation, secured tenure to relocation land, better housing at resettlement sites with comparable access to employment and production opportunities, integration of resettled persons economically and socially into their host communities, and extension of project benefits to host communities; (ii) transitional support and development assistance, such as land development, credit facilities, training, or employment opportunities; and (iii) civic infrastructure and community services, as required.	The legal framework applicable for expropriation of assets mainly focuses on provision of cash compensation to the extent of acquired assets, and it does not provide land-based compensation or transitional support for relocating the affected households. For bridging the gap, eligibility and entitlement provisions for providing economic assistance and transitional support to eligible households experiencing physical or economic displacement and for relocating their assets to the alternate sites have been included in the RF prepared as part of the PSSA for implementing the program in a manner consistent with ADB's SPS policy principles.
Principle 5: Improve the standards of living of the displaced poor and other vulnerable groups, including women, to at least national minimum standards.	There is no such requirement under the national legal framework. So, provisions about identification have been included in the RF for program that will be followed to identify displaced poor and other vulnerable groups, including elderly, children and women and to provide needed assistance for improving or at least restoring their livings standard to pre project level.
Principle 6: Establish procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement to ensure that those people who enter into negotiated settlements will maintain the same or better income and livelihood status.	In the national / provincial legal framework, specific procedures for acquisition of land through negotiated settlement are not elaborated. Further, the expropriation of land under LAA 1894 or acquisition of land through negotiated settlement will be avoided. So, principle 6 will not trigger. However, additional land is required due to unavailability of vacant land within existing SHC&MED portfolio then allocation of alternate public/government land or voluntary land donation by the community through a transparent process may be considered. The RF includes provisions and procedures to be followed for land acquisition and/or voluntary land donation.
Principle 7: Ensure that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of non-land assets.	The National law does not allow compensation to those without legal title or recognizable legal right to use land/asset. To address the gap, affected informal users of project sites will be included in the resettlement plan for compensating lost non-land assets and providing assistance for relocating and enable them to restore their living standards.
Principle 8: Prepare a resettlement plan elaborating on displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and	No such requirement under the National legal and policy framework. The gap will be addressed by preparing and implementing the RPs to mitigate any economic or physical displacement or restricted access. The RPs will include

reporting framework, budget, and time-bound implementation schedule.	entitlement provision and budget estimate for providing compensation and assistance in accordance with the entitlements set out in in the RF included in PSSA for program.
Principle 9: Disclose a draft resettlement plan, including documentation of the consultation process in a timely manner, before project appraisal, in an accessible place and a form and language(s) understandable to affected persons and other stakeholders. Disclose the final resettlement plan and its updates to affected persons and other stakeholders.	No such requirement under the National legal and policy framework. The consultation and information disclosure strategy explained in the RF attached with PSSA and program implementation document (PID) will be adhered to for disclosure of program related information in a timely manner in a place accessible to the affected people and other stakeholders. Meanwhile, the RPs (if required) will be disclosed on EA/IA web sites and in accessible places at all SOE sites.
Principle 10: Conceive and execute involuntary resettlement as part of a development project or program. Include the full costs of resettlement in the presentation of project's costs and benefits.	No such requirement under the National legal and policy framework. Budget and resources to plan and implement involuntary resettlement (if any) will be included and monitored in the project's overall budget.
Principle 11: Pay compensation and provide other resettlement entitlements before physical or economic displacement. Implement the resettlement plan under close supervision throughout project implementation.	The legal framework also requires payment of compensation prior to taking possession of acquired assets except in cases when an urgency clause is invoked. For bridging the gap, any compensation and assistance required will be set out in the RP and provided to affected persons prior to displacement. RP implementation will be subject to internal monitoring and verification of full implementation[6] of resettlement plan prior to allowing sites for construction.
Principle 12: Monitor and assess resettlement outcomes, their impacts on the standards of living of displaced persons, and whether the objectives of the resettlement plan have been achieved by taking into account the baseline conditions and the results of resettlement monitoring. Disclose monitoring reports.	There are no such requirements under national and provincial legal frameworks. Monitoring setup will be put in place as a gap bridging measure. Even though significant IR impacts i.e., physical, economical displacement of people is not expected, subprojects will be monitored to ensure that the IR impacts have been mitigated and/or avoided.
Indigenous People Planning	
Principle 1: Screen early on to determine: (i) whether IP/SEC are present in, or have collective attachment to,the project area; and (ii) whether project impacts on IP are likely.	Implementation of designed RBL program for PN&HWR in Punjab will not trigger Indigenous People (IPs) requirements outlined in ADB, SPS 2009, because the IPs as defined in SPS 2009 are not found in Punjab.
Principle 2: Undertake a culturally appropriate andgender-sensitive social impact assessment or use similar methods to assess potential project impacts, both positive and adverse, on IP. Give full consideration to options for the affected IPs prefer in relation to theprovision of project benefits and the design of mitigation measures.	This is not applicable to the RBL program for PN&HWR in Punjab
Principle 3: Undertake meaningful consultations with affected IPs communities and concerned IP organizations to solicit their participation.	
Principle 4: Ascertain the consent of affected IP/SEC to the following project activities: (i) commercial development of the cultural resources and knowledge of IP; (ii) physical displacement from traditional or customary lands; and, (iii) commercial development of natural resources within customary lands under use that would impact the livelihoods or the cultural, ceremonial,spiritual uses that define the identity and community of IP.	This is not applicable to the RBL program for PN&HWR in Punjab

[6] Full implementation of resettlement plan means, compensation is fully paid to all payable DPs or secured in the escrow account for unpaid DPs having legal and administrative impediments (absentee owners, disputed title, pending mutation, juvenile or lunatics etc.) and livelihood measures put in place.

Principle 5: Avoid, to the maximum extent possible, anyrestricted access to and physical displacement from protected areas and natural resources. Where avoidance is not possible, ensure that the affected IP/SEC participate in the design, implementation, monitoring and evaluation of management arrangements for such areas and natural resources and their benefits are equitably shared.	
Principle 6: Prepare an IPP that is based on the socialimpact assessment with the assistance of qualified andexperienced experts and that draw on indigenous knowledge and participation by the affected IP communities.	This is not applicable to the RBL program for PN&HWR in Punjab.
Principle 7. Disclose a draft IPP, including documentation of the consultation process and the results of the social impact assessment in a timelymanner.	
Principle 8. Prepare an action plan for legal recognition of customary rights to lands and territories or ancestraldomains when the project involves (i) activities that are contingent on establishing legally recognized rights to lands and territories that IPs have traditionally owned or customarily used or occupied, or (ii) involuntaryacquisition of such lands.	
Principle 9. Monitor implementation of the IPP using qualified and experienced experts; adopt a participatory monitoring approach, wherever feasible; and assess whether the IPP's objective and desired outcome havebeen achieved.	

EARF = Environmental Assessment and Review Framework; GRM = grievance redress mechanism, IA = implementing agency; IEE = Initial Environmental Examination, EMP = Environmental Management Plan; IPs = indigenous people; IPP = indigenous peoples plan; RF = Resettlement Framework; PN&HWR = Punjab Nursing and Health Workforce Reform Program.

Source: Asian Development Bank and Government of Punjab.

ANNEX 5: ENVIRONMENTAL AND SOCIAL SAFEGUARDS (IR & IP) RISKS ASSESSMENT AND CONSULTATION REPORT

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I. PROJECT BACKGROUND

1. The Punjab Nursing and Health Workforce Reform Project (PNHWRP) in Pakistan intends to optimize health workforce availability, quality, and performance by supporting the availability of an adequately skilled health workforce to fulfill current and emerging health needs. This Results-Based Loan (RBL) project will be executed by the Punjab Specialized Healthcare and Medical Education Department (SHC&MED) as Executing Agency. SHC&MED will establish a lean program management unit with dedicated staff as the implementing agency.

2. At the heart of the program three state-of-the-art Centers of Excellence (COEs) for nursing education will be established in Lahore, Multan, and Rawalpindi. These COEs will embody the best international practices, featuring cutting-edge curricula, fully digital learning environments, advanced simulation labs, and climate-resilient infrastructure. They will also serve as degree-conferring institutions, attracting top talent through competitive admissions and cultivating a culture of academic and professional excellence. The COEs will align with global accreditation standards, such as those outlined by the World Health Organization (WHO) and the National League for Nursing (NLN).

3. The program's overarching goal is to optimize the availability, quality, and performance of the health workforce in Punjab, ensuring it can meet the current and emerging health needs of the population. This aligns with global efforts to achieve Universal Health Coverage (UHC) and Sustainable Development Goals (SDGs), particularly SDG 3 (Good Health and Well-Being) and SDG 5 (Gender Equality).

4. The key project outputs include:

- Output 1: Quality of nursing professionals improved
- Output 2: Climate-resilient and gender-sensitive COEs for nursing education established
- Output 3: Governance and management for health workforce strengthened

5. Planned activities under **output 1** will improve the quality of nursing professionals by enhancing faculty capacity, expanding specialized training, modernizing curricula, and establishing continuing professional education standards. It will also promote equitable access through digital linkages between the COEs and the province's 44 public nursing colleges.

6. The **output 2** will support the construction and operationalization of three climate-resilient and energy-efficient COEs in Multan, Lahore, and Rawalpindi, complete with simulation labs, digital learning platforms, and student hostels. These COEs will serve as regional training hubs for undergraduate, postgraduate, and short-term specialized nursing programs. Meanwhile, the **output 3** will strengthen governance and management of the nursing workforce by establishing an independent management and quality assurance entity for the COEs, integrating nursing education data into the provincial HRMIS, and introducing policy and regulatory reforms to support workforce planning, accountability, and private sector participation.

7. Only Output 2 of the PNHWRP RBL program will invest in the development of three new state-of-the-art Centers of Excellence (COE) for nursing education in Lahore, Multan, and Rawalpindi. The project activities and works are subject to comply with the national and provincial

legal frameworks and the safeguard policy requirements of the ADB. Under ADB safeguards policy and outlined operational guidelines for processing of result based lending programs/projects a program safeguards system assessment (PSSA) is required and for that very purpose, this environmental safeguard risk assessment and consultation findings report is delivered as **Annex 4** of the PSSA.

8. The present report provides a detailed assessment of environmental impacts and risks associated with potential sites considered for establishing the Centers of Excellence (COE for nursing education and environmental or social impacts that could be likely during execution of planned construction activities. It also includes a review of institutional setup and its safeguards management capacity and findings of the consultation meetings conducted with responsible government entities.

II. SCREENING OF PROGRAM'S ENVIRONMENTAL SAFEGUARDS IMPACTS

1. Anticipated Environmental Impacts

9. At the moment, there is incomplete information available on the typology of construction works of the selected sites or the design features of the Centers of Excellence (COEs). The typical construction activities can include:

(i) **Pre-Construction**: site preparation, surveying, soil testing, design, approvals, material procurement; fencing and provision of temporary utilities
(ii) **Foundation Work**: mark layout, excavate, dewatering (if needed), piling or shallow foundation, lay footings, raft slabs, apply waterproofing and anti-termite treatment
(iii) **Superstructure Construction**: build basement (if required), construct ground floor slab, columns, repeat floor - wise: columns → beams/slabs → curing, build staircases, brickwork & partitions, build internal/external walls, install lintels and sills, seal and cure walls
(iv) **MEP Installations**: electrical wiring and conduits, plumbing and sanitation, HVAC, fire safety, elevators/escalators
(v) **Finishing Work**: internal/external plastering, false ceilings, wall putty, and primer, flooring and tiling, painting
(vi) **Doors, Windows & Fixtures**: install door/window frames and panels, fit kitchen and bathroom fixtures, add electrical switches and lights
(vii) **External Works**: build compound walls and gates, paving, parking, walkways, landscaping and drainage
(viii) **Final Finishing**: clean-up, inspections, and handover

10. Potential adverse environmental impacts during construction phase are mainly related to construction activities, including (i) noise and vibration may be caused by the operation of earth moving and excavation equipment, concrete mixers, cranes and the transportation of materials and equipment; (ii) soil erosion may be caused by exposure of soil surface to rain and wind during site clearing, earth moving, and excavation activities; (iii) emission of fugitive dust caused by a combination of on-site excavation and movement of earth materials, contact of construction machinery with bare soil, and exposure of bare soil and soil piles to wind; (iv) exhaust from diesel engines of earth moving equipment; (v) wastewater and site runoff affecting public drainage systems; (vi) inappropriate disposal of solid wastes from the construction sites, including hazardous and non-hazardous waste including asbestos-containing materials and hazardous liquids; (vii) occupational health and safety risks for site construction workers; and (viii) potential

risk to public health and safety as the construction sites will be in the built-up area of cities. These impacts are short-term and site-specific, which can be mitigated through the application of standard construction management practices. The relevant mitigation measures are provided in the subsequent EARF prepared for the Punjab Nursing and Health Workforce Reform Project (PN&HWRP).

11. No significant operation phase environmental impacts are anticipated during the operation of facilities to be supported under the program. During operation, the municipal solid waste, wastewater, chemicals, electronic waste, etc., from the constructed COE buildings can easily be addressed and mitigated by integrating those facilities into the region's municipal services (water supply, solid waste, and EPA certified contractor for sewer collection and disposal), and by ensuring compliance with relevant building codes (related to energy efficiency, ventilation, air conditioning, fire safety, etc.).

2. Due Diligence of the Areas for Construction of Centers of Excellence (COEs) in Multan, Lahore, and Rawalpindi

2.1 COE in Multan (within the premises of Nishtar-2 Tertiary care hospital)

12. **Multan site.** The site is at the existing complex of Nishtar-2 tertiary care hospital at Moza Laabr-O-Bulail Old Multan Shujabad Road. The site is near to the M4 Motorway Terminal in Multan and approximately 20 kilometers from Multan city center, making it accessible via Shujabad Road.

13. The project site is a greenfield area located within the existing Nishtar 2 Building Complex. There are no underground utilities present at the site. The location of the site is given in Figure 1 below.

Figure 1. Location of the Proposed COE Site at Multan



Source:

14. Integrated Biodiversity Assessment Tool (IBAT) and Rapid Environmental Assessment (REA) Checklist were used for assessing the designated areas and other sensitive receptors around the project zone based on the coordinates of the project location (30, 71.4). According to IBAT report results, no protected areas as well as Key Biodiversity Areas (KBA) were found within 1 km, 5 km, 10 km, 20 km of the area of interest for proposed Multan COE site. No special area

for protecting biodiversity, encroachments in historical areas, or physical cultural resources (PCR) have been identified in close proximity to the project site. No national parks, wildlife sanctuaries or similar eco-sensitive areas were identified near the project site.

15. **Nishtar Nursing College within Nishtar-1 Hospital**: Nishtar Nursing College is situated within Nishtar 1 Hospital, Multan, inside Nishtar Medical University on Nishtar Road, Gillani Colony, Multan. The college is approximately 5 kilometers from the city center, providing convenient access to students and faculty while being located within a well-equipped tertiary healthcare and academic university.

Figure 2: Location of Nursing College



Source:

16. The college was established in 2010 and serves as an integral part of Nishtar Medical University and is closely affiliated with Nishtar-1 Hospital, an 1,800-bed tertiary care facility. The institution offers a Bachelor of Science in Nursing (BSN), Master of Science in Nursing (MSN), and diploma programs, along with specialized training in Intensive Care Unit (ICU) Nursing, Coronary Care Unit (CCU) Nursing, and Pediatric Nursing. With a student strength of 900 and a dedicated faculty of 32 members, the college provides a comprehensive academic and practical foundation for the nurses. Its location within a major hospital allows students to gain hands-on clinical experience across multiple departments, enhancing their patient care skills.

17. **Total area of Nishtar Nursing College.** The college spans a total area of 0.85 acres, with the nursing college building covering 0.37 acres as a G+1 structure in good condition, free of structural deformities. Adjacent to the college, on the eastern side, is the hostel building, covering 3.15 acres. However, the hostel is in a deteriorated condition with severe structural damage.

Figure 3: Nursing College Multan



Source:

Figure 4: Nursing Hostel's Condition



Source:

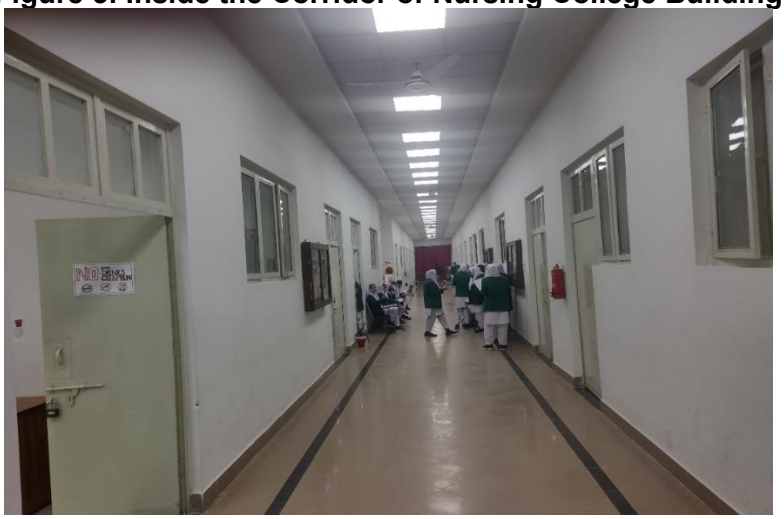
18. **Drinking water and sanitation at Nishtar Nursing College:** The college staff and students rely on filtered water for drinking purposes, with small filters installed alongside water coolers. While the filters are reportedly changed regularly, the water quality has not been tested for safety. The groundwater used by Nishtar 1 Hospital is also supplied to the nursing college, primarily for washing and other non-drinking purposes.

19. The overall sanitation system is well-maintained, with no stagnant water accumulation during the rainy season. Additionally, the site has never experienced flooding, and the sewerage system is functioning efficiently, with no blockages reported in the past.

20. **Safety and waste management of Nishtar Nursing College.** The nursing college lacks an emergency exit and power backup system. Fire extinguishers are installed and in working condition, but there is no water hydrant system. Some staff members have undergone emergency

evacuation, CPR, and fire safety training in collaboration with Rescue 1122. There are no hazardous waste sources within the college; only general waste is produced, which is disposed of in the main Nishtar Hospital waste bins.

Figure 5: Inside the Corridor of Nursing College Building



Source:

21. **Sewage and wastewater disposal of Nishtar Nursing College:** There is no septic tank or wastewater treatment facility at the nursing college or Nishtar 1 Hospital. The sewage from the nursing college is directly discharged into the hospital's main sewerage system, which, in turn, is disposed of into the WASA main sewage without any treatment.

22. **Consultation with Nursing Staff of Nishtar Nursing College:** A consultation session was **conducted** at the Nursing College Multan with key nursing staff to discuss the existing nursing education framework and the requirements for establishing a Center of Excellence (COE). The details of the consultation are outlined below in Table 1.

Table 1: Outcomes of Consultation Meetings

Sr. No.	Stakeholder Consulted	Place of Meeting	Date	Attendees	Key Discussion Points	Outcomes
1.	Nursing College Nishtar-1 Hospital Multan	Nursing College Multan	21/12/2024	Qamar-un-Nisa (Principal) Shugufta Majeed (Senior Nursing Instructor) Qamar Mehmood (Office Superintendent)	Review of Nursing Program or Facilities Required for Center of Excellence (COE)	The attendees highlighted that the Nursing College Multan is the only institution in the Southern Punjab region dedicated to producing skilled nurses. They emphasized the importance of establishing a Center of Excellence (COE) to enhance nursing education and ensure it meets international standards. The COE would play a crucial role in developing highly qualified nursing professionals to serve the region's growing healthcare needs. Additionally, concerns were raised about the current hostel facilities, which are in a

Sr. No.	Stakeholder Consulted	Place of Meeting	Date	Attendees	Key Discussion Points	Outcomes
						deteriorated state, making it essential to provide suitable accommodation for students. To ensure an optimal learning environment, the attendees stressed the need for enhanced facilities, including air conditioning, power backup systems, advanced laboratories, and an upgraded library. These improvements are necessary to support high-quality education and professional development for future nurses.

Source:



Consultations with Nursing Staff of Nishtar Nursing College.

23. **Nishtar II Hospital Multan:** Nishtar-2 Hospital, Multan, is a state-of-the-art tertiary care facility situated at Moza Laabr-O-Bulail, Old Multan, Shujabad Road. Spanning a total area of 58 acres, with a covered area of 12.3 acres, the hospital was established in 2019.

24. Its development is structured into three phases:

- Phase 1: A 560-bed hospital building, which has been successfully completed.
- Phase 2: A planned 500-bed expansion.
- Phase 3: The future establishment of Nishtar Medical University & Nursing College.

25. While Phases 2 and 3 are in the planning stages, Phase 1 is fully operational. The Outpatient Department (OPD) services commenced in May 2023, followed by the launch of indoor and emergency services in February 2024.

26. Access to the Nishter-II Hospital site is well-developed and conveniently connected to all major roads, ensuring easy access for patients traveling from other cities. The hospital is accessible via Shujaabad Road, a vital transportation link. To the north, Shujaabad Road connects to Motorway M4 and National Highway N5, facilitating seamless travel. To the south, it links National Highway N70 and the Multan Southern Bypass, enhancing regional connectivity. Additionally, Nagshah Chowk serves as a key intersection, connecting Old Shujaabad Road, Shujaabad Road, Multan Southern Bypass Road, and National Highway N70, further improving accessibility to the hospital.

Figure 7: Location of Nishtar 2 Hospital and Site for COE



Source:

27. The Nishtar-2 hospital offers a 120-bed emergency department, 24 outpatient consultant rooms, 50-bed Intensive Care Units (ICUs), 12 modular operation theaters, and a comprehensive diagnostic department equipped with endoscopy suites, ECG facilities, pathology, and radiology services. Clinical specialties encompass neurosurgery, orthopedic surgery, general surgery, internal medicine, gynecology and obstetrics, pediatrics, pulmonology, anesthesiology, and intensive care. Non-clinical departments ensure efficient operations, including hospital waste management, IT services, biomedical support, and financial administration.

28. Specialized services at Nishtar-2 Hospital include rehabilitation therapy, a 24/7 pharmacy, a state-of-the-art blood bank, and advanced laboratory facilities. The hospital is actively pursuing accreditation from the Punjab Healthcare Commission (PHC), the College of Physicians & Surgeons Pakistan (CPSP), and the Pakistan Medical & Dental Council (PMDC) to enhance medical training and postgraduate education.

29. Demonstrating a strong commitment to community well-being, the hospital has launched public health initiatives such as the Universal Health Initiative (UHI), providing free treatments; a dedicated diabetes clinic; a dengue ward offering free testing; a tuberculosis (TB) clinic; a breast cancer screening facility; and research workshops. Future developments include the induction of postgraduate programs anticipated in July 2024, expanded transport services, and the construction of staff hostels and medical staff accommodations. With its cutting-edge medical infrastructure, dedicated staff, and patient-centered approach, Nishtar-2 Hospital stands as a beacon of healthcare excellence in Multan and the surrounding regions.

Figure 8: Nishtar-2 Hospital Building



Source:

Figure 9: Layout of Nishtar-2 Hospital



Source:

30. The proposed site for the COE is within the Nishtar-2 Hospital complex, adjacent to the Phase 1 building. This site has been designated for future Phase 3 developments, which include the establishment of a medical university along with a nursing college.

31. **Drinking water sanitation of Nishtar-2 Hospital:** Nishtar-2 Hospital features a large water treatment plant that ensures a safe and reliable supply of treated water for drinking purposes. Regular testing of drinking water is conducted to maintain quality standards, and

routine maintenance of the treatment plant is performed to ensure optimal functionality. Additionally, sanitation at the Nishtar-2 site is well-maintained, with no stagnant water present.

32. **Fire safety and emergency of Nishtar-2 Hospital.** Nishtar-I2 Hospital is well-equipped with comprehensive fire safety measures to ensure the safety of patients, staff, and visitors. Fire extinguishers and fire hydrants have been strategically installed throughout the facility, while certain departments are equipped with an advanced automatic ceiling fire sprinkler system for enhanced fire suppression. The hospital also features clear emergency floor markings to guide occupants during an evacuation, along with a designated assembly point located outside the building for safe congregation. Additionally, multiple emergency exits are available to facilitate swift evacuation, and a fully functional emergency alarm system is in place to provide immediate alerts in case of fire or other emergencies.

33. **Waste management of Nishtar-2 Hospital.** The solid waste generated at Nishtar-2 Hospital comprises sharp, infectious, pathological, pharmaceutical, chemical, genotoxic, and general non-hazardous waste. The hospital produces approximately 2,000 kg of waste daily, with 500 kg categorized as biomedical risk waste. Waste management procedures adhere to the Punjab Hospital Waste Management Rules, 2014, encompassing segregation, collection, storage, transportation, treatment, and disposal. Segregation is carried out using color-coded bins to prevent cross-contamination. A dedicated yellow room with controlled storage temperatures is maintained for hazardous waste. Pathological (red) waste is securely buried within the facility, while yellow waste is incinerated by a third-party waste management company. Temporary storage areas are properly maintained, with waste retention limited to a maximum of 48–72 hours. On-site transportation is conducted using designated trolleys, while off-site waste disposal is managed by an external waste management provider. Municipal solid waste is segregated separately and collected and disposed of by the Multan Waste Management Company (Figure 10).

Figure 10: Waste Management for Nishtar-2 Hospital



34. The wastewater generated at Nishtar-2 Hospital is treated through a wastewater treatment plant (WWTP). During the site visit, the WWTP was observed to be fully functional; however, its

capacity and treatment process could not be determined, as no personnel were available on-site to provide details. The plant operates under a third-party contract, with the contracted entity responsible for its operation and maintenance. The treated wastewater is disposed in Shujaabad Canal.

Figure 11: Wastewater treatment plant



35. **Consultation with Nishtar-2 hospital staff.** A consultation session was held at Nishtar-2 Hospital to assess the current infrastructure, facilities, and requirements for establishing a Center of Excellence (COE). The discussion focused on key considerations related to site suitability, infrastructure needs, and environmental compliance. The details of the consultation are summarized in Table 2 below:

Table 2: Summary of Consultation with Nishtar-2 Hospital Staff

Sr. No.	Stakeholder Consulted	Place of Meeting	Date	Attendees	Key Discussion Points	Outcomes
1.	Staff of Nishtar-2 Hospital Multan	Nishtar-2 Hospital	21/12/2024	Dr. Sania Batool (MS) Dr. Mahia (Consultant) Sonia Bibi (Nursing Supervisor) Engineer Sharoze (Procurement Officer) Mr. Younus (NS) Dr. Qadeer (DMS) Dr. Fakhia Arbab (DMS Admin)	site suitability, infrastructure needs, and environmental compliance	The proposed site within the hospital complex is ideal for establishing the nursing college, as it is integrated within a tertiary care hospital and is already designated for medical university and nursing college development in Phase 3. – The existing wastewater treatment plant (WWTP) is currently designed to accommodate the hospital's capacity. If the nursing college is established, the WWTP will require an upgrading to manage the additional load. – The current water supply and sewerage system are sufficient to accommodate the additional demand from the nursing college. – The input of the Nursing Principal and Nursing Supervisor should be

	incorporated into the planning and development of the COE to ensure it meets the required standards. – There is no dedicated Environmental Manager or Compliance Officer for Nishtar-2 Hospital. At present, IDAP (Infrastructure Development Authority of Punjab) is overseeing environmental compliance for the hospital.

Figure 12: Consultation with Nishtar-2 Hospital Staff



Source:

36. The operation of the COE facilities to be built under the program likely will not increase the treatment load of the existing sewage treatment facilities and waste management facilities. However, more detailed assessment of the existing facilities will be conducted during detailed design and national IEE preparation stage. In case, if upgrading of the existing facilities is needed, then they will be upgraded as per need and according to national requirements and standards.

37. **Potential Environmental Risks in COE Site in Multan.** The project site is a greenfield area located within the existing Nishtar 2 Building Complex. Potential environmental impacts during the construction and operation phases of the program are primarily associated with sewage and solid waste to be generated during both phases of the project. These impacts will be addressed through the implementation of mitigation measures. The Environmental Management Plan (EMP) will outline specific mitigation strategies to ensure effective waste management, an increase in vehicular traffic is also anticipated during the construction and operational phases of the project, which could lead to a higher risk of accidents. To mitigate these risks, an emergency response plan will be implemented for both phases to address and prevent such impacts: an increase in traffic volume is anticipated which will likely lead to higher levels of air and noise pollution. These impacts will be mitigated through the implementation of specific measures outlined in the Environmental Management Plan (EMP), which will include strategies to address and manage air and noise pollution effectively: OHS impacts are anticipated during the construction phase of the project. However, these impacts are expected to be site-specific, small-

scale, temporary, and reversible if properly managed. The IEE and EMP will outline strategies to mitigate OHS risks and address community safety concerns effectively: generation of dust in sensitive areas during construction is anticipated to be generated during the construction phase of the project, however, the impact is expected to be site-specific, small-scale, temporary, and reversible; vi) excavated and spoil material will be generated during the construction phase of the project. The impacts associated with this will be mitigated through the implementation of appropriate mitigation measures. The EMP will include specific strategies to address the proper disposal of spoil material; vii) during civil foundation works and the erection of buildings noise and vibration are anticipated. These impacts are expected to be site-specific, small-scale, temporary, and reversible. They will be mitigated through appropriate measures outlined in the EMP/IEE; viii) risks to community safety from fire, electric shock, or failure of the building's safety features during operation are anticipated for the Center of Excellence building. However, an Environmental Management Plan (EMP) will be implemented to mitigate these impacts effectively through proper safety measures, regular maintenance, and training programs to ensure safe operation and minimize potential hazards; ix) community safety risks due to accidental and natural hazards are anticipated throughout all phases of the project. However, these risks will be addressed through the implementation of a comprehensive Environmental Management Plan (EMP)**,** ensuring robust safety measures, community engagement, and compliance with safety standards. This will minimize risks and ensure the well-being of both the community and workers.

2.2. Establishment of Center of Excellence (COE) at Lahore

38. **Lahore site.** The site selection process for the proposed Center of Excellence (COE) in Lahore is currently ongoing. The Specialized Healthcare & Medical Education Department (SHC&MED) has identified a government owned land parcel located along Pine Avenue in Valencia Town, Lahore, as a potential site. However, this location has not yet been confirmed.

39. It has been reported that the Government of Punjab is planning to develop a Medical City in Lahore to serve as a centralized hub for healthcare services, medical education, and research, addressing the growing healthcare demands of the region. As part of this broader initiative, the establishment of the COE for Nursing is also being considered within the proposed Medical City. However, the final location and the specific land area to be allocated for the Medical City have yet to be confirmed.

40. For due diligence purposes, the site located along Pine Avenue in Valencia Town, Lahore, has been assessed as a potential location for the proposed Center of Excellence (COE). However, since the final location of the proposed Medical City has yet to be confirmed, within the LDA city which is government land owned by the Lahore Development Authority, so, the Specialized Healthcare & Medical Education Department (SHC&MED) is required to reassess the suitability of the Medical City site considering this ongoing uncertainty.

41. Furthermore, a comprehensive site screening must be conducted in alignment with the guidelines and prescribed format set forth in the Program Safeguard System Assessment (PSSA). This is critical to ensure full compliance with the ADB SPS, 2009.

42. The project site is a greenfield area located at Pine Avenue Road in front of Cancer Hospital Site, Block M. Valancia Lahore. The area of the site is approximately 4 acres. The site is accessible via Pine Avenue Road. The coordinates of site are: 31°23'53.5"N 74°14'56.6"E. The location of the site is given in Figure 13 and Figure 14 below:

Figure 13. Location of Lahore site



Figure 14. Location of Lahore site



43. Integrated Biodiversity Assessment Tool (IBAT) and Rapid Environmental Assessment (REA) Checklist were used for the assessment of the designated areas and other sensitive receptors around the project zone based on the coordinates of the project location. According to IBAT report results, no protected areas as well as Key Biodiversity Areas (KBA) were found within 1 km, 5 km, 10 km, 20 km of the area of interest for proposed Lahore COE site. No special area of protecting biodiversity within close proximity of the project site. According to the field visit observations, no encroachments in historical areas, and no Physical Cultural Resources (PCR) have been identified in close proximity to the project site. Basic infrastructure, including sewerage and water supply systems, is available at the location. No underground utilities are present at the site. Additionally, there are no nationally significant cultural heritage sites within its immediate vicinity. No National Parks, wildlife sanctuaries or similar eco-sensitive areas were identified in the close proximity of project. Only in 50 km zone there is one protected area - Changa Manga Forest.

44. **Potential Environmental Risks for COE Site in Lahore:** The project site is a greenfield area located at Pine Avenue Road in front of Cancer Hospital Site Block M Valancia Lahore. Potential environmental impacts during the construction and operation phases of the program are primarily associated with: i) sewage and solid waste to be generated during both phases of the project. These impacts will be addressed through the implementation of mitigation measures. The Environmental Management Plan (EMP) will outline specific mitigation strategies to ensure effective waste management; ii) an increase in vehicular traffic is also anticipated during the construction and operational phases of the project, which could lead to a higher risk of accidents. To mitigate these risks, an emergency response plan will be implemented for both phases to address and prevent such impacts; iii) an increase in traffic volume is anticipated which will likely lead to higher levels of air and noise pollution. These impacts will be mitigated through the implementation of specific measures outlined in the Environmental Management Plan (EMP), which will include strategies to address and manage air and noise pollution effectively; iv) OHS impacts are anticipated during the construction phase of the project. However, these impacts are expected to be site-specific, small-scale, temporary, and reversible if properly managed. The IEE and EMP will outline strategies to mitigate OHS risks and address community safety concerns effectively; v) generation of dust in sensitive areas during construction is anticipated to be generated during the construction phase of the project, however, the impact is expected to be site-specific, small-scale, temporary, and reversible; vi) excavated and spoil material will be generated during the construction phase of the project. The impacts associated with this will be mitigated through the implementation of appropriate mitigation measures. The EMP will include specific strategies to address the proper disposal of spoil material; vii) during civil foundation works and the erection of buildings noise and vibration are anticipated. These impacts are expected to be site-specific, small-scale, temporary, and reversible. They will be mitigated through appropriate measures outlined in the EMP/IEE; viii) risks to community safety from fire, electric shock, or failure of the building's safety features during operation are anticipated for the Center of Excellence building. However, an Environmental Management Plan (EMP) will be implemented to mitigate these impacts effectively through proper safety measures, regular maintenance, and training programs to ensure safe operation and minimize potential hazards; ix) community safety risks due to accidental and natural hazards are anticipated throughout all phases of the project. However, these risks will be addressed through the implementation of a comprehensive Environmental Management Plan (EMP)**,** ensuring robust safety measures, community engagement, and compliance with safety standards. This will minimize risks and ensure the well-being of both the community and workers.

2.3. Establishment of Center of Excellence (COE) at Rawalpindi (within the premises of Mother Care Child Hospital)

45. Several alternative sites were being considered for the construction of the Rawalpindi COE until 20 April 2025 including i) Rawalpindi Medical University (RMU), ii) Rawalpindi Institute of Urology (RIU)/Punjab Kidney and Liver Institute –II (PKLI-II), and iii) Mother Child Hospital (MCH) Asghar Mall Road Rawalpindi. However, based on review of preliminary findings, SHC&MED after a joint site visit dated 20 April 2025, confirmed the MCH as ultimate site for establishing the COE for nursing education. The information about the MCH site and the potential environmental risks and environmental safeguards issues associated with the selected site are discussed in detail below.

46. **Mother Child Hospital Asghar Mall Road Rawalpindi.** Mother and Child Hospital Rawalpindi is located on Asghar Mall Road in the heart of the Rawalpindi City. It has been constructed on the government land that was allocated for Tuberculosis Hospital established at site in 1936. The old building of TB hospital (50-bed facility for indoor and outdoor patients) was

demolished and in addition to MCH building a single-story new building of Federal TB Center (exclusively outdoor patient facility) has been constructed along the northern side boundary within the same premises. Nonetheless, due to certain administrative issues between the elected federal and provincial governments the construction and operationalization of the MCH building was delayed, however, the TB Center has been operational in new building since 2014-15 for serving 300–350 patients daily.

47. The construction of the MCH building was started by the Federal Government back in 2006-07, but due to pending construction works it could not be operationalized. Now, the Federal Government is transferring the MCH building and land with entire infrastructure including the Federal TB center to Punjab government for its operations. The SHC&MED will take over the entire infrastructure and the MCH will be put into operation after the completion of construction works.

48. Since the MCH with entire infrastructures is being placed under SHC&MED portfolio, so this site has been considered seriously for establishing the COE for nursing education. Additional Secretary (Development) and the ADB consultants mobilized for Technical Assistance and preparation of the RBL project visited this site on 20 April 2025. Multiple options including use of land available as car parking in front of TB hospital for construction of COE nursing and the possibility for relocation of Federal TB Hospital in another nearby tertiary care hospital under SHC&MED portfolio was inquired. The SHC&MED is of the view that the operation of an infectious disease facility with the premises of a Children Hospital is not acceptable under any health standards. However, the SHC&MED assured that the vacant car parking (almost 1 Acre) available in front of TB hospital will be utilized to the maximum extent for establishing COE nursing by constructing a multistory building. Meanwhile, a separate approach road (~25 feet wide) between the boundary wall and the marked land for COE will be secured to provide interruption free access to TB center for its continued operation at site. Thus, based on the assessment, it is confirmed that an approximately 1-acre plot of vacant government land, situated between the TB hospital and Asghar Mall Road within MCH premises, has been allocated for the Rawalpindi COE. Separately, SHC&MED is considering relocating the adjacent TB center, irrespective of the COE development, to enhance service delivery through integration with a tertiary care hospital. Should this relocation proceed and free up additional space, the expanded area may subsequently be reviewed and considered for COE development, subject to formal approval.

49. The allocated COE Rawalpindi site is accessible via Asghar Mall Road. The project site is a brownfield area located at Asghar Mall Road Rawalpindi beside the Federal Government TB hospital. There are no underground utilities present at the site. The coordinates of site are 33°37'36.9"N 73°03'16.1"E. The location of the site is given as below.

Figure 15. Location of proposed COE Site at Rawalpindi



Source:

50. Integrated Biodiversity Assessment Tool (IBAT) and Rapid Environmental Assessment (REA) Checklist were used for the assessment of the designated areas and other sensitive receptors around the project zone based on the coordinates of the project location. According to IBAT report results, no protected areas as well as Key Biodiversity Areas (KBA) were found within 1 km, 5 km, 10 km, 15 km of the area of interest for proposed Multan COE site. No special area for protecting biodiversity within close proximity of the project site. According to the field visit observations there are no encroachments in historical areas, and no Physical Cultural Resources (PCR) have been identified in close proximity to the project site. No National Parks, wildlife sanctuaries, wetlands or similar eco-sensitive areas were identified in the close proximity of project site.

51. The following Protected Areas and Key Biodiversity Areas are found within 20 km and 50 km of the area of interest, details are provided in Table 3.

Table 3. Protected Areas and Key Biodiversity Areas within 20 km and 50 km area

Area name	Within buffer of
Protected areas	
Ayubia	20 km
Makhnial Khanpur	20 km
Margalla Hills	20 km
Azad Pattan	50 km
Bagra	50 km
Chamnaka	50 km
Gari Phulgaran	50 km
Kala Chitta	50 km
Kheri Murat	50 km
Kotli	50 km
Malkan Area	50 km
Mang	50 km
Murree Kahuta and Kotli Sattian	50 km
Rakh Nadir Khan	50 km
Rakh Raja Gustasap Khan	50 km
Rakh Saeed Taj Mohammad Khan	50 km
Rakh Sardaran	50 km
Rakh Sardaran	50 km
Rakh Syed Ali Shah	50 km
Rakh Syedan	50 km
Rakh Tiyal Seydom	50 km
Key Biodiversity Areas	
Margalla Hills National Park 20 km	20 km
Ayubia National Park and Kao valley, Dunga Gali	50 km

Source:

52. **Potential Environmental Risks for COE Site in Rawalpindi**: The site is located at Asghar Mall Road Rawalpindi besides the Federal Government TB hospital. Since the demolishing of existing TB center is envisaged for Rawalpindi COE construction, therefore according to the SPS 2009 for projects involving facilities and/or business activities that already exist or are under construction, the borrower/client will undertake an environment audit, including on-site assessment, to identify past or present concerns related to impacts on the environment. The objective of the compliance audit is to determine whether actions were in accordance with ADB's safeguard principles and requirements for borrowers/clients and to identify and plan appropriate measures to address outstanding compliance issues. Where noncompliance is identified, a corrective action plan agreed on by ADB and the borrower/client will be prepared. The plan will define necessary remedial actions, the budget for such actions, and the time frame for resolution of noncompliance. The audit report (including corrective action plan, if any) will be made available to the public in accordance with the information disclosure requirements of the Safeguard Requirements 1–3. Potential environmental impacts during the construction and operation phases of the program are primarily associated with: (i) generation of sewerage and solid waste and what is most important, generation of construction waste during demolishing of existing TB center for construction of Rawalpindi COE, potentially including material containing asbestos as well as medical waste. The Environmental Management Plan (EMP) will outline specific mitigation strategies to ensure effective solid and hazardous waste management; (ii) an increase in vehicular traffic is also anticipated during the construction and operational phases of the project, which could lead to a higher risk of accidents. To mitigate these risks, an emergency response plan will be implemented for both phases to address and prevent such impacts; (iii) an increase in traffic volume is anticipated which will likely lead to higher levels of air and noise pollution. These impacts will be mitigated through the implementation of specific measures outlined in the Environmental Management Plan (EMP), which will include strategies to address and manage air and noise pollution effectively; (iv) OHS impacts are anticipated during the construction phase of the project. However, these impacts are expected to be site-specific, small-scale, temporary, and reversible if properly managed. The IEE and EMP will outline strategies to mitigate OHS risks and address community safety concerns effectively; (v) generation of dust in sensitive areas during construction is anticipated to be generated during the construction phase of the project, however, the impact is expected to be site-specific, small-scale, temporary, and reversible; (vi) excavated and spoil material will be generated during the construction phase of the project. The impacts associated with this will be mitigated through the implementation of appropriate mitigation measures. The EMP will include specific strategies to address the proper disposal of spoil material; (vii) during civil foundation works and the erection of buildings noise and vibration are anticipated. These impacts are expected to be site-specific, small-scale, temporary, and reversible. They will be mitigated through appropriate measures outlined in the EMP/IEE; (viii) risks to community safety from fire, electric shock, or failure of the building's safety features during operation are anticipated for the Center of Excellence building. However, an Environmental Management Plan (EMP) will be implemented to mitigate these impacts effectively through proper safety measures, regular maintenance, and training programs to ensure safe operation and minimize potential hazards; and (ix) community safety risks due to accidental and natural hazards are anticipated throughout all phases of the project. However, these risks will be addressed through the implementation of a comprehensive **Environmental Management Plan (EMP)**, ensuring robust safety measures, community engagement, and compliance with safety standards. This will minimize risks and ensure the well-being of both the community and workers.

III. SCREENING OF PROGRAM'S SOCIAL SAFEGUARDS IMPACTS

53. Preferably, the COEs should be strategically located on available public land within the precincts of the existing tertiary care hospital to avoid the need for land acquisition and mitigate potential adverse social impacts. Hosting COEs within hospital premises will ensure seamless integration with healthcare facilities, providing students with access to clinical training and high-quality mentorship. However, if vacant land is unavailable within the precincts of the selected hospitals, the COEs can be hosted on other government owned land available nearby, preferably within the SHC&MED portfolio. This strategy will help in minimizing the land acquisition and recurrent cost, avoiding the implementation delays and ensuring the timely realization of the program's objectives.

54. The SHC&MED is firmly committed to avoid expropriation of land and assets under the LAA 1894 for avoiding and minimizing the involuntary resettlement impacts including physical/economic displacement likely due to lost shelter and productive assets. It aimed to select the government owned vacant land either within the premises of an established tertiary care hospital or in its nearby surroundings. The SHC&MED has already earmarked and confirmed the available government owned land parcels within precincts of Nishtar-2 Hospital Multan and Mother Child Hospital Rawalpindi for construction of COEs at Multan and Rawalpindi respectively. The site selection for Lahore COE is still under process. The SHC&MED earmarked a government land parcel along the pine avenue of Valencia Town Lahore as a potential site for establishing the COE but it is not confirmed yet. While it is reported that the Government of Punjab is aiming to establish a Medical City in Lahore for providing centralized medical facilities, education and research for addressing growing health care needs of the region and it is considering establishing the COE nursing on-site to be allocated within the Medical City. However, the location and the land area to be allocated for the Medical City in Lahore is not confirmed yet within the LDA city which is government land owned by the Lahore Development Authority. For safeguards due diligence work, considered potential sites and the selected (confirmed) sites for establishing COEs at Lahore, Multan and Rawalpindi have been visited and the key stake holders were consulted to access the information related to i) ownership status of the identified and selected land parcels, ii) identify and document formal/informal third-party land use rights established on selected land iii) screen and assess potential IR/IP impacts, and iv) suggest mitigation measures accordingly. The social safeguards due diligence findings for each selected site are summarized below.

1. Social Safeguards (IR) risk assessment about the site selected for COE Lahore

55. Land Ownership Status: A government owned land parcel (approx. 5 cares), opposite to Nawaz Sharif Institute of Cancer Treatment (under construction) along Pine Avenue in Valencia Town Lahore has been considered by the SHC&MED as a potential site for establishing the COE for nursing education at Lahore which is not yet confirmed. For safeguards due diligence purpose, the said site was visited to identify and assess potential IR and social risks associated with it. The land parcel was previously allocated to Punjab Law Department. SHC&MED has coordinated with the district land revenue authorities and the BOR Punjab for its demarcation and allocation to SHC&MED for establishing the COE for nursing education. The google image below shows the land plot selected for the COE and the NS institute of cancer treatment along the Pine Avenue in Valencia Town Lahore.

Figure 16: Selected site for COE Nursing in front of NS Institute for Cancer Treatment



56. The SHC&MED has formally requested the concerned authorities in the BOR Punjab for directing the district land revenue and land record management entities for transferring the ownership and possession the of said land to SHC&MED. The copies of letters sent by the SHC&MED to BOR for transferring the land title and issuing documents confirming SHC&MED as sole proprietor of said land are requested that will be attached as annex-II for reference.

57. **Legacy Issues:** The earmarked government land parcel was part of the same khewat number that was jointly owned by a household and the government of the Punjab. The said land parcel remained in cultivation until the demarcation was done by the district land revenue authorities in early 2024. Accordingly, the landowner household vacated the government owned land parcel and restricted the cultivation to the extent of its titled land and constructed a boundary wall between his land and the government owned land. The picture below shows the wall between the household's cultivated land and the government land where wild weeds are growing. During the visit, the adjoining landowner household was interviewed for comprehending the pending legacy issue or adversely affected third-party land use rights (if any) due to alienation of the government land after demarcation. Interviewee confirmed that his household has no pending claim or liabilities on the alienated government owned land plot.

Figure 17: Pictures showing boundary wall and uses of private and government land



Divider wall separating private owned land (on left) and government owned land (on right)



Cultivated wheet crop in private owned land



Weeds growth in vacated government land

58. **Potential Involuntary Resettlement (IR) Risks:** A small portion of land on southwest corner of selected land parcel is used as scrap yard by an encroacher/informal land user household. A structure (a room with corrugated steel sheet roof and temporary sheds covering about 300 ft2 area) and open land in front of the noted structure is used for storing collected scraped materials including the wreckage and crush of the burnt bricks by the occupant household/s. The google image shows the structure located on government owned land that is being used by an informal land user for earning livelihood.

Figure 18: Image showing encroached structure on land selected for COE Nursing Lahore



59. The occupant household of said structure was also interviewed. The occupant of the structure clarified that he is not using the structure for residential purpose and the premise is used to store collected scrap including wreckage of construction material. Further, it was told that the government entities have already informed him for vacating the land before any construction activity is allowed on-site. It was noted that the occupied premises are being used informally for earning livelihood by selling the collected scrap and discorded household items of different types and the brick's crush. The pictures below exhibit the structures, bricks and crushed materials including a loaded tractor trolley parked at site.

60. Thus, based on preliminary screening and review of IR risks associated with a potential site being considered for COE Lahore, it is assessed that the clearance of the encroached structure and restricted use of government land may entail the economic displacement of multiple households including one occupying the premises and others linked to it informally for earning livelihood through collection and sale of scrap materials and crush of bricks. However, upon confirmation of selected site, finalization of detailed design and demarcation of the land to be used for the construction of COE building blocks, site-specific IR risks screening and assessment will be required to determine the scope of IR impacts and preparation of requisite safeguards due diligence documents including RP if so required to ensure compliance to ADB's safeguard requirements outlined in the program appraisal documents.

Figure 19: Pictures of encroached structure and productive use of land



Encroached structure on government land



Stored debris and bricks crush load for sale

61. **Consultations at site with adjoining land owner and informal land user:** During the site visit, the adjoining landowner and noted informal land user households were consulted for documenting their interests and concerns likely from perceived restriction of access to the land and its productive use. The discussion focused on the planned establishment of the CEO for nursing education and key considerations related to site suitability, claimed formal/informal land use rights and perceived loss of shelter and/or income source due to interruption of access to the land required for establishment of the COE for nursing. The consultation outcome is crisply summarized in Table 4 below:

Table 4: Summary of Consultation with Local Land Owner and Informal User of Land

Sr. No.	Stakeholder Consulted	Place of Meeting	Date	Outcomes
1	Land owner household (adjoining agricultural land parcel) and informal land user household.	Selected Land site along Pine Avenue, Valencia Town Lahore)	20/03/2025	The land owner household confirmed and clarified that: – the titled land including shares of land owned by the recorded household and the Punjab government were recorded and as placed in one jointly owned land khewat in land revenue record. – After completing land demarcation process in 2024, the land revenue authorities severed jointly owned land parcel into two land parcels as per respective shares of the landowner household and the government of Punjab. – The private landowner vacated the government land portion and constructed a boundary wall was constructed by the land owner household between his titled land plot and the government land.

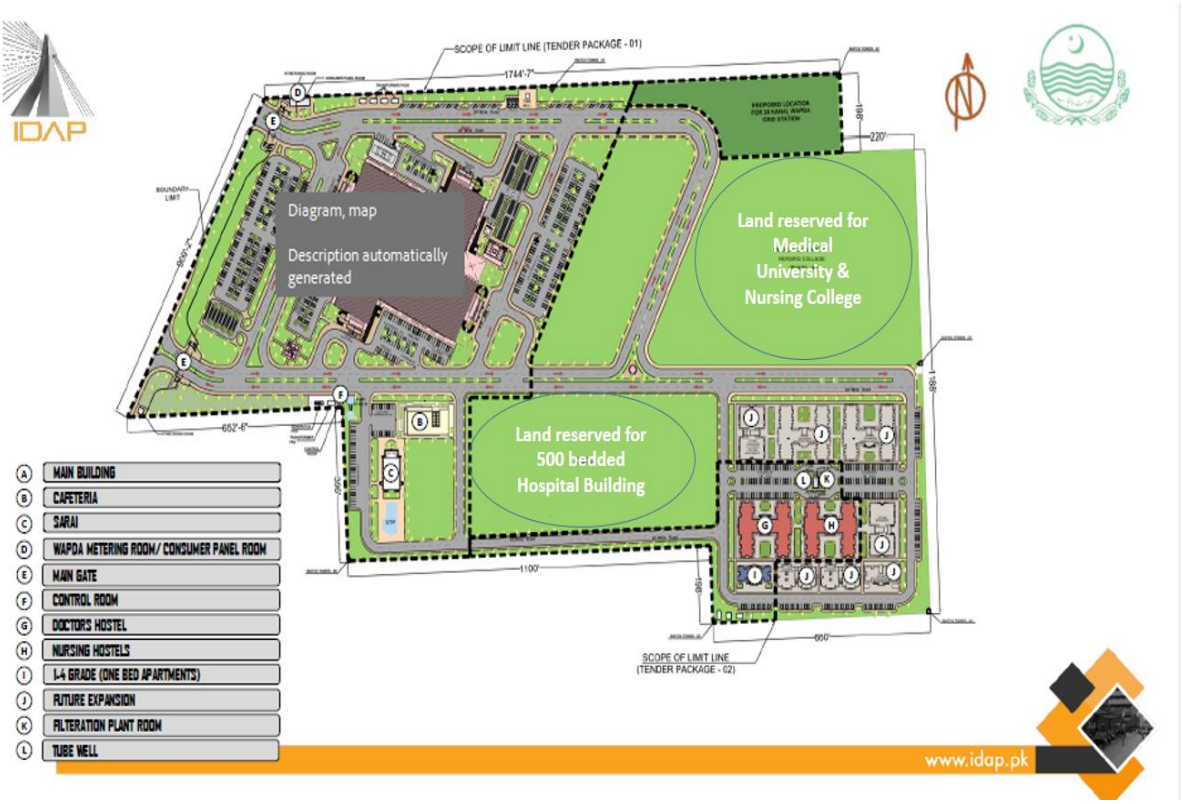
	– The private landowner informed that he did not incur any loss of crops, trees or structures during demarcation, and he was allowed to harvest his crops before vacating possession of the demarcated government owned land parcel. He also confirmed that he has no pending claim are any interest on the vacated government land parcel. The noted informal owner/user of encroached structure and occupied compound clarified that: – the noted assets were established by the adjoining landowner for raising the livestock which was abandoned by him after demarcation of government land and the titled land owned by the household – The government authorities already communicated him for vacating the demarcated government land and shifting his activities to any other place nearby. He confirmed to shift at his own, well before the site is handed over for construction.

2. Social Safeguards (IR) Risk Assessment for the Site Selected for COE Multan

62. **Ownership status of land allocated for Nishter-2 Hospital Multan:** The SHC&MED confirmed that the Nishtar-2 Tertiary Care Hospital that was established in 2019 on a 58-acre government land. The land was previously owned by the Punjab Forest and Wildlife Department (40 acre) and City District Government Multan (18 acres). Following the request of SHC&MED, in February 2019, the BOR Punjab sanctioned the transfer of 40 acres from the Forest and Wildlife Department to SHC&MED and advised the district land revenue authorities to mutate the land record accordingly. The BOR also directed the transfer of 18 acres of land of the City District Government to SHC&MED. Following the BORs directions, said 58 acres of government land was transferred and handed over to SHC&MED for construction of Nishtar-2 Hospital. The copies of correspondence and land title documents confirming SHC&MED as sole proprietor of said land are attached as Annex 3 for reference.

63. **Availability of land for establishing the COE for nursing in Nishter-2 Hospital:** A 500 bedded hospital building block (ground+3 floor) has been fully constructed and operationalized since February 2024 under phase-1. The accommodation building blocks (Hostels and apartments) are under construction. Another 500 bedded hospital building block and a medical university / nursing college are planned in the available vacant land under phase-2 and phase-3 respectively. Almost 12.5 acres of land is reserved for construction of a medical university and Nursing college. The layout plan below exhibits the established and planned use of allocated 58 acres of land for the existing phase-1 hospital building with allied facilities including hostels, waste treatment plant and power grid etc. as well as the land reserved for phase 2 and phase 3 interventions.

Figure 20: Nishter-2 layout showing land reserved for Medical University/Nursing College



64. **Legacy Issues:** Review of shared land record confirmed that the land owned by the provincial government (Forest and Wildlife Department) and the city District government was transferred to the SHC&MED for construction of Nishter-2 Tertiary care hospital back in 2019 after completing the legal process. During the site visit, it was noted that the entire allocated land for Nishter-2 is demarcated and secured by constructing the boundary wall. During consultations, the Nishter-2 Hospital Management was asked about the land title and compensation related complaints and grievances received and redressed since taking possession of the land. The Hospital management categorically confirmed that they did not receive any complaint and grievance related to pending land compensation of any other legacy issue. Further, it was advised that the land allocated and handed over for Nishter-2 is free from any encumbrances and established formal or informal third-party land use.

65. **Potential Involuntary Resettlement (IR) Risks: T**he earmarked land has boundary walls, and it is free from any encumbrances and third-party land use. The google image below exhibits that the vacant land allocated for the medical university and nursing college is free from any encumbrances and is not used for cultivation or any other productive activity. Therefore, establishment of COE for nursing education on said land in not expected to see IR related impacts. However, this will be reconfirmed following the detailed design and demarcation of the land for construction of COE building blocks.

Figure 21: Google image exhibiting and reserved for Medical University/Nursing College



66. **Consultation with Nishtar 2 Hospital Administration:** During site visit in December 2024, a consultation session was held at Nishtar-2 Hospital administration to discuss and comprehending the land acquisition process followed for establishing the Nishter-2 Multan, identify any legacy issues and compensation cases (if any) and third-party land use rights (formal/informal) established on the land allocated for Nishter-2 hospital particularly the land reserved to establish medical university and nursing college. The discussion focused on screening and assessing potential IR impacts and measures needed to ensure compliance with the national legal framework and ADB's safeguards policy requirements. The consultation outcomes are crisply summarized in Table 5 below:

Table 5: Summary of Consultation with Nishtar 2 Hospital Staff

Sr. No.	Stakeholder Consulted	Place of Meeting	Date	Outcomes
1	Administration and Staff of Nishtar 2 Hospital Multan	Nishtar 2 Hospital	21/12/2024	Site visit and consultations with hospital administration elucidated that: – the land area reserved for medical university and nursing college is ideal for establishing the COE for nursing education as it is integrated within a tertiary care hospital; – 58 acres of recorded government land was allocated for Nishter-2 by the district land management authorities in 2019. It included 12 acres' land parcel reserved for medical university and nursing college; – the land allocated for Nishtar-2 hospital and Medical University is enclosed by a boundary wall and it is free from all encumbrances and third-party uses;

- The hospital is operational since 2024 and the hospital administration never received any complaint and/or grievance from community about non-payment or pending compensation for land and or other land-based assets.

3. Social Safeguards risk assessment about the site considered for COE Rawalpindi

67. The SHC & MED considered multiple health facilities as potential sites to establish COE for nursing education in Rawalpindi that included: i) Rawalpindi Medical University (RMU), Tipu Road, ii) Mother Child Hospital (MCH), Asghar Mall Road and iii) Rawalpindi Institute of Urology (RIU), Muree Road which is attached to the Punjab Kidney and Liver Institute and renamed and Punjab Kidney and Liver Institute-II since 2022. The SHC&MED also coordinated with the District Management and Land Revenue authorities for identification and allocation of a suitable government owned land parcel for establishing the COE for nursing education in newly urbanizing areas in the outskirts of Rawalpindi City.

68. Following the advice of the project team and SHC&MED, all three potential sites i.e. i) RMU, ii) RIU/KPLI-II and iii) MCH were visited to assess the availability of vacant land and its potential for establishment of COE within the premises of each proposed site. After a joint site visit of the MCH on 20 April 2025, confirmed the MCH as ultimate site for establishing the COE for nursing education in Rawalpindi. The information on the availability of vacant land and IR risks assessment for the RMU and RIU/PKLI-II is summarized here. Information about the availability of land and the potential IR risks and social safeguards issues associated with the MCH site are discussed in detail.

69. **Rawalpindi Medical University (RMU).** Rawalpindi Medical University evolved in 2017 from Rawalpindi Medical College which was established in 1974. The old campus of the RMU is on Tipu Road, whereas its new campus is established within the premises of the Holy Family Hospital (Satellite Town, Rawalpindi). Both campuses are 4-5 km apart from each other. The land occupied by the RMU main campus is about 15 acres out of which almost 6 acres of land is vacant that include playground (~4 acre.), irregular shaped vacant land (~0.6 acre) and Car parking area (~1.3 acre).

70. Although the playground has sufficient land to host both academic and hostel building blocks for establishing the COE for nursing education, but the RMU administration showed unwillingness to allow use of playground area for any infrastructure development purpose including establishing the COE for nursing education. During the site visit, the RMU management suggested t the irregular shaped vacant land area (0.6 acre) between car parking and student hostel for establishing the COE for nursing education. Use of said land will not entail acquisition of land and potential IR risks, but it is not sufficient to accommodate both academic and hostel building blocks for the nursing COE. Therefore, the SHC&MED did not select this site. The google image below exhibits marked playground and the irregular shaped vacant land area available within the RMU campus.

Figure 22: Google image exhibiting open land available in Rawalpindi Medical University (RMU)



71. **Rawalpindi Institute of Urology (RIU)/Punjab Kidney and Liver Institute –II (PKLI-II):** The project was conceived in 2009 and its foundation stone was laid in 2012. In March 2020, the SHC&MED directed to operationalize the facility as a Corona Management Center, that remained functional until March 2022. In April 2023, the Prime Minister of Pakistan, inaugurated the Rawalpindi Institute of Urology (RIU) and since then, the institute has been providing Outpatient Department (OPD) services, Dialysis, and Lithotripsy. In August, 2023, the Provincial Cabinet, in its 22nd meeting, notified the Rawalpindi Institute of Urology as an attached institute of the Pakistan Kidney and Liver Institute and Research Center (PKLI&RC) in Lahore and the facility was renamed as Punjab Kidney and Liver Institute-II (PKLI-II).

72. The RIU/PKLI-II is located on 94 kanals of government land out of which almost 2 acres (16 Kanal) of open land is developed as car park and lawn. Another 2 acres is available for future development. The available open land is secured within the boundary wall of the RIU and can be considered as potential site for establishing the COE for nursing education. The management and operation of the RIU/PKLI-II are administered through the Board of Governors of KPLI & RC. For establishing the COE nursing within the premises of RIU/PKLI-II, prior permission of PKLI&RC's Board of Governor is mandatory. The SHC&MED believes that the PKLI & RC board of governors will not allow construction of COE for nursing within the premises of the RIU/PKLI-II Rawalpindi. Therefore, the SHC&MED did not select this site. The google image below exhibits the available land within the RIU/PKLI-II.

Figure 24: Google image exhibiting open land (car parking and vacant land plot) in RIU / PKLI-II



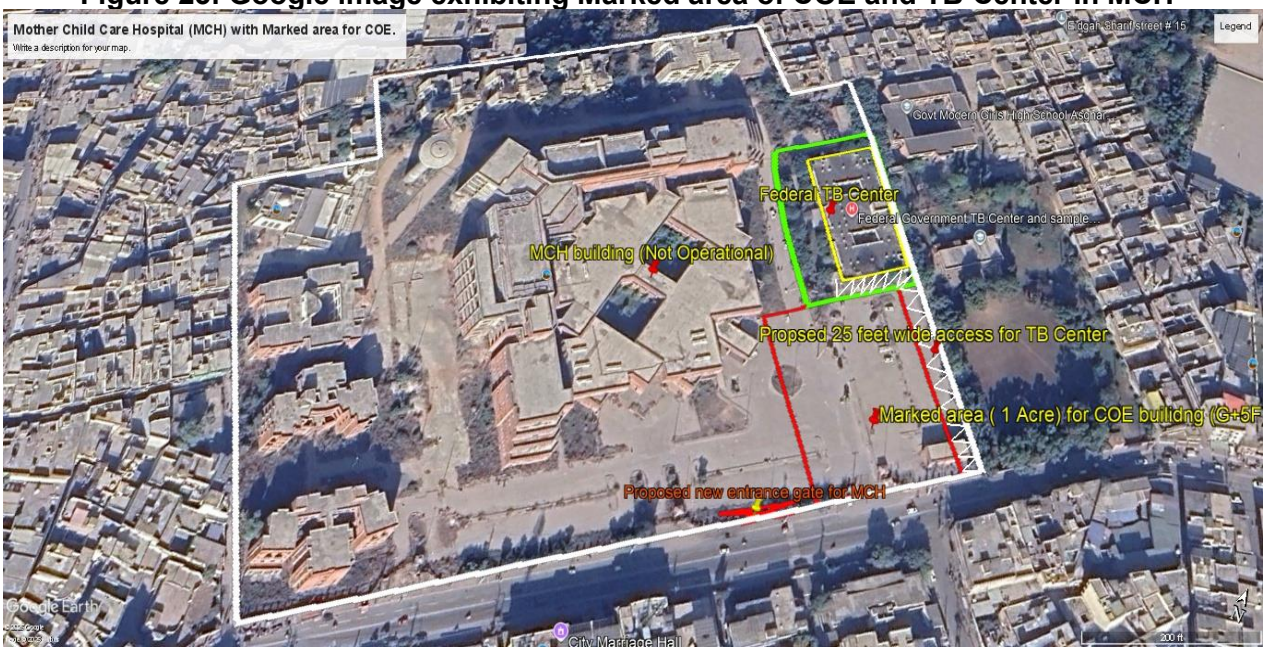
73. **Mother Child Hospital (MCH) Asghar Mall Road Rawalpindi:** Mother and Child Hospital Rawalpindi is located on Asghar Mall Road in the heart of the Rawalpindi City. The MCH project was conceived in 2006 and its construction was started by the Federal Government on the government owned 12.5 acres' land on which was allocated for providing health facility patients across the region and a 50 beds Tuberculosis Hospital (indoor and outdoor patient facility) was established at site in 1936. The old building of TB hospital was demolished for construction of the MCH building and a new building (ground floor + basement) for Federal TB Center (exclusively outdoor patient facility) was constructed on the northern boundary of the site within the same precincts. Due to certain administrative issues between the elected federal and provincial governments, the construction and operationalization of the MCH building was delayed, however, the Federal TB Center has been operational since 2014, serving 300-350 patients daily.

74. The allocated land is owned by the Federal Government which is mostly occupied under the MCH building blocks (main hospital building with dormitories for doctors and nurses) and the Federal TB center. Encumbrance free vacant land is not available for new construction except for the triangular shaped two land parcels used as car parking space in front of the MCH and TB center Building Blocks. The construction of the MCH building was started by the Federal Government back in 2006-07 which is partially completed. Now, the Federal Government is transferring to SHC&MED the ownership of the MCH building and land occupied under it with entire infrastructure including the Federal TB center located at site. After completing the ongoing finishing works of the MCH building, the SHC&MED will operationalize the MCH.

75. Since the MCH with entire infrastructures is being placed under SHC&MED portfolio, so this site has been considered seriously for establishing the COE for nursing education. Additional Secretary (Development) and the ADB consultants mobilized for Technical Assistance and preparation of the RBL project visited this site on 20 April 2025. Multiple options including use of land available as car parking space in front of TB hospital for construction of COE nursing as well as possibility for relocating Federal TB Center -to alternate tertiary care hospital under SHC&MED

portfolio for clearing and use of land occupied by TB Center hospital were deliberated. The SHC&MED was of the view that the operation of an infectious disease facility with the premises of a Children Hospital is not acceptable under any health standards and after its transfer to SHC&MED it could be relocated in a nearby hospital under SHC&MED portfolio for better service delivery through its integration with a fully equipped tertiary care hospital. Initially the SHC&MED confirmed that the car parking space (almost 1 Acre) in front of the TB Center will be utilized to the maximum extent for establishing COE nursing by constructing a multistory building. A separate approach road (~25 feet wide) between the boundary wall and the marked land for COE will be secured to provide interruption free access to the TB center for its continued operation at site. Thus, based on the assessment carried out, it is confirmed that an approximately 1-acre plot of vacant government land, situated between the TB Center and Asghar Mall Road within MCH premises, has been allocated for the Rawalpindi COE. Separately, SHC&MED is considering relocating the adjacent TB Center, irrespective of the COE development, to enhance service delivery through integration with a tertiary care hospital. Should this relocation proceed and free up additional space, the expanded area may subsequently be reviewed and considered for COE development, subject to formal approval. Google image of the site showing marked vacant land for COE (rectangle with red lines), existing TB center (rectangle with green lines) and proposed separate passage for TB center (zigzag white lines) is included below.

Figure 23: Google image exhibiting Marked area of COE and TB Center in MCH



76. **Legacy Issues:** Above discussed medical university and hospital facilities are located on government land within the municipal limits of Rawalpindi City. The land title record for each site was not shared for review to confirm ownership status. However, the reviewed background information elucidated that the RMU was established back in 1974 on the government owned land plot occupied by it since its establishment, while the government land occupied by the RIU/KPLI was allocated for its establishment at the time of project approval in 2009 i.e. more or less 15 years ago. The premises occupied by the MCH was allocated government land for Federal TB Hospital in 1936. Since then, this land is being used for the use and operation of health facilities only. The Federal TB Center and MCH are the projects of federal government, but since the 18th amendment of the Pakistan Constitution, the health function was devolved to the provincial government. The Federal government is transferring both health facilities (including land) to the

provincial government for future operations. Historically the land is occupied and used by the government to provide health services, so it is believed that this land will not have any legacy issue or claims by third-party users.

77. **Potential Involuntary Resettlement (IR) Risks: T**he earmarked land (~1 acre) for the establishment of a COE in front of the TB center within the periphery of MCH in Rawalpindi is enclosed within boundary walls. Encroachments and third-party users (formal/informal) were not spotted during the site visits. Use of available land for COE building blocks will not cause IR impacts, however, it may compromise the approach passage for TB center that may adversely affect the access of patients and visitors to medical facilities for treatment. To address this, a 25 feet wide separate approach corridor will be provided between the existing boundary wall and the proposed COE building for the patients and visitors to continue benefiting from the facility without any interruption. The SHC & MED is of the view that the infectious diseases treatment facility like TB center should not be operated within the premises of a dedicated children hospital because the children are more vulnerable for infections. So, regardless of the land needed for COE, SHC&MED is considering relocating the TB center to any other Government Hospital under its portfolio. In case SHC&MED decide to relocate the TB center to another location, it may require detailed assessment to determine associated social impacts and IR risks if any. Once, the site selection is finalized, based on detailed design and demarcation of the land to be used for construction of COE building blocks, a new IR risks assessment will have to be conducted to ensure compliance to ADB's safeguard requirements.

4. Potential Indigenous People (IP) safeguards-related risks

78. The COEs are planned to be established in three metropolitan cities of the Punjab. The Punjabi people are the main ethnolinguistic group in the Punjab province, which is shared by India and Pakistan. The Punjabis are the largest ethnic group of Pakistan and the Punjabi identity is based on language, culture, and geography, rather than religion or historical origin. The other ethnolinguistic groups in Punjab include the Pashtuns who have migrated to Punjab for better earning opportunities, the Saraiki (a dialect of Punjabi spoken in southern part of the province) speaking Baloch people living in the bordering districts between Punjab and Baluchistan province. Integration and assimilation are important parts of Punjabi culture and Punjabi identity is not based on tribal connections. The review of demographic profile of the Punjab province confirmed that the people or tribal groups and ethnic minorities claiming themselves as indigenous people or those having secluded culture, socioeconomic institutions different form mainstream population or attachment to their ancestral lands or resources are not spotted in any of the district of Punjab. Therefore, the program intervention will not impose risks related to IP safeguards.

IV. Institutional setup and Safeguards Management Capacity Assessment

79. This results-based Lending (RBL) program will be executed by the Punjab Specialized Healthcare and Medical Education Department (SHC&MED) as an Executing Agency. The SHC&MED is establishing a Project Implementation Unit (PIU) for planning, design and implementing the projects and programs to accomplish the health care reforms agenda of SHC&MED to augment the capacity of the PIU and smooth delivery of RBL program, a Program Implementation Unit (PIU) has been proposed that will be mandated as implementing agency (IA) for the PN&HWR Program. In Punjab, the public infrastructure development component of planned projects/programs is implemented through the Communication and Works Department Punjab and/or Infrastructure Development Authority Punjab (IDAP). For the planned RBL program, the EA and IA will engage IDAP as service provider for infrastructure development and procurement of allied furniture and fixtures under output-2. More comprehensive information regarding the institutional setup and safeguards management capacity assessment of executing and implementing agencies is provided in the below sections.

1. Executing Agency - Punjab Specialized Healthcare and Medical Education Department (SHC&MED)

80. SHC&MED in Punjab, Pakistan, plays a pivotal role in enhancing the province's healthcare system and medical education infrastructure. Building upon its core functions, the department's responsibilities and initiatives include:

81. Expanded Functions:

(i) Healthcare Delivery:

- Specialized Medical Services: SHC&MED ensures access to advanced medical care by overseeing specialized hospitals and clinics, aiming to improve patient outcomes and healthcare accessibility.

(ii) Infrastructure Development:

- The department focuses on upgrading healthcare facilities, ensuring they are equipped with modern medical technologies and adhere to quality standards.

(iii) Medical Education:

- Curriculum Development: Collaborating with medical institutions, SHC&MED updates curricula to align with global medical standards and emerging healthcare needs.
- Accreditation and Certification: The department oversees the accreditation of medical and nursing schools, ensuring that graduates meet the required competencies for practice.

(iv) Policy and Regulation:

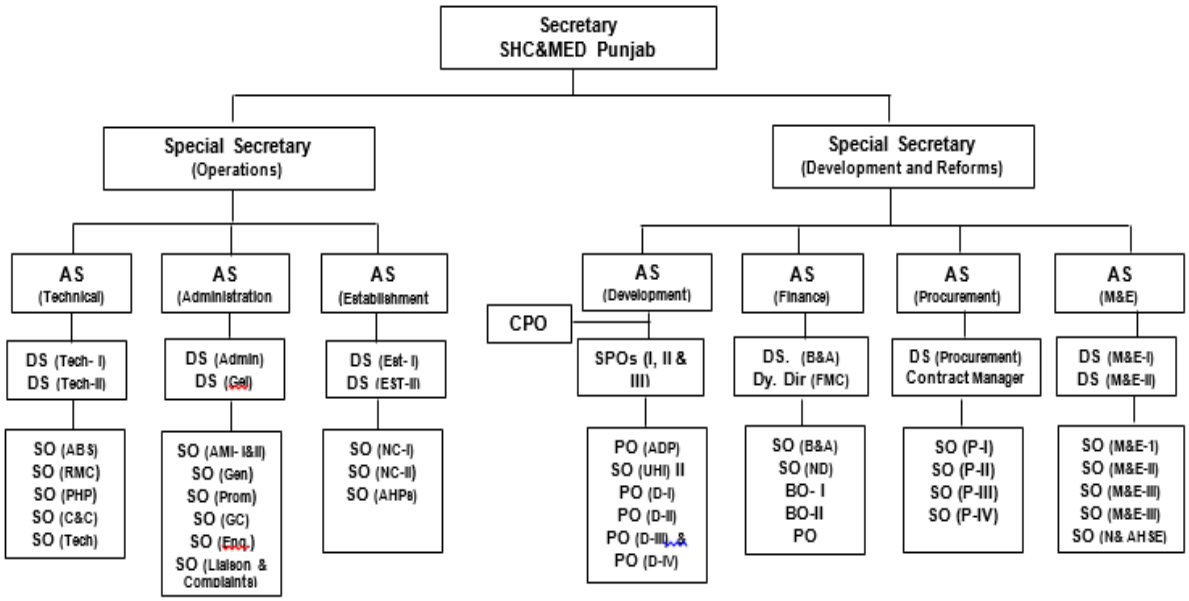
- Healthcare Policies: Developing policies that regulate medical practices, healthcare standards, and the overall healthcare system to ensure quality and accountability.
- Legal Framework: Administering laws such as the Pakistan Medical and Dental Council Ordinance, 1962, and the Pharmacy Act, 1967, to maintain professional standards.

(v) Health Initiatives and Research:

- Research Promotion: Supporting research in medical sciences to foster innovation and evidence-based practices within the healthcare system.
- Technology Integration: Promoting the adoption of advanced medical technologies to enhance service delivery and patient care.

82. **Organizational Structure:** The SHC&MED, led by the Minister of Health, operates under the administrative control of the Secretary SHC&MED. For performing mandated regulatory, development and reforms related functions the Secretary SHC&MED is supported by two special secretaries i.e. Special Secretary (Operations) and Special Secretary (Development and Reforms). The Special Secretary (operations) with support of three additional secretaries and subordinate staff oversees the technical, administrative and establishment related functions. While the Special Secretary (Development and Reforms) assisted by four additional secretaries and subordinate staff takes care of development, finance, procurement, monitoring & evaluation related functions mandated to SHC&MED. This structured approach ensures attention to each critical area of healthcare and medical education. Below is a simplified organogram of SHC & MED.

Figure 25. Organogram of the SHC&MED



83. **Grievance Redressal Mechanism (GRM):** SHC&MED has established mechanisms to address public concerns:

- Public Grievance Redressal System (PGRS): An online platform that allows citizens to lodge grievances regarding public services, ensuring transparency and accountability of the Punjab Government.
- Complaints and Suggestions Portal: A dedicated section on the SHC&MED website where individuals can submit feedback and complaints related to healthcare services and medical education.

84. While SHC&MED has established grievance redressal mechanisms, there is a need for a project specific formal GRM at the Project Implementation Unit (PIU) level, especially for donor-funded projects.

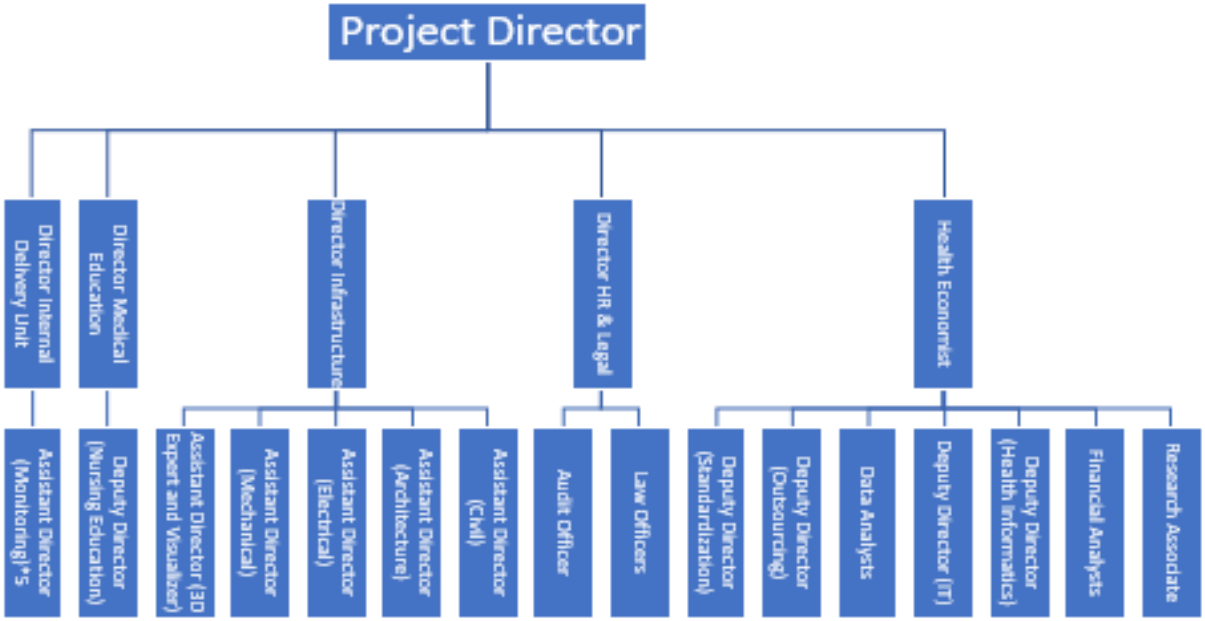
85. **Environment and Social Safeguards Management capacity: SH&MED** currently lacks a dedicated **safeguard unit** or **environmental and social specialists** within its structure as well as the approved organizational setup of the Program Implementation Unit (PMU) being established by the SHC&MED. This gap limits the department's ability to directly manage environmental and social risks associated with its projects. As a result, screening and assessment of social and environmental aspects of development projects, preparation of safeguards due diligence documents including **Initial Environmental Examinations (IEE) and/or Resettlement Plans (RPs), and requisite** environmental approvals, are often outsourced and handled through external consultants or service providing departments for infrastructure development projects , such as the **Communication and Works (C&W) Department Punjab** and/or **Infrastructure Development Authority Punjab (IDAP)**.

2. Implementing Agency – Program Implementation Unit (PIU) of the SHC&MED

86. **Program Implementation Unit** (PIU): SHC&MED provides curative healthcare services across Punjab through tertiary care hospitals including specialized institutions. Meanwhile it is governing the medical universities, medical colleges, nursing colleges and allied health professional schools and colleges to provide quality medical education to the public. SHC&MED aims to enhance service delivery by revamping the existing infrastructure and adding new schemes for capacity enhancement. However, the SHC&MED lacks in-house capacity and expertise needed for assessment of existing infrastructure, determine and recommend infrastructure rehabilitation requirements, preparing feasibility reports, PC-1s and concept notes for review and approval of competent authorities.

87. SHC & MED will establish a Project Management Unit (PIU) under the Special Secretary (Development and Reforms) to overcome its capacity constraints for which a PC-1 has been approved. The PMU will be mandated as implementing agency (IA) for execution of the ADB financed RBL program. g education. As per the approved PC-1, the Pwill be led by a Project Director and will hire skilled professional across diverse fields such as health economists and Directors with technical and expert staff needed for HR & Legal, Infrastructure, Medical Education and internal delivery. The goal of establishing the PIU is to ensure that the SHC&MED has the necessary expertise in these critical areas to effectively assess, plan, manage and oversee its development projects and its operations. Below is the organogram of approved PMU.

Figure 26. PDWP approved Organogram of the PMU being established by SHC&MED



88. The Project Management Unit (PMU), being established under the SHC&MED will perform the following key functions:

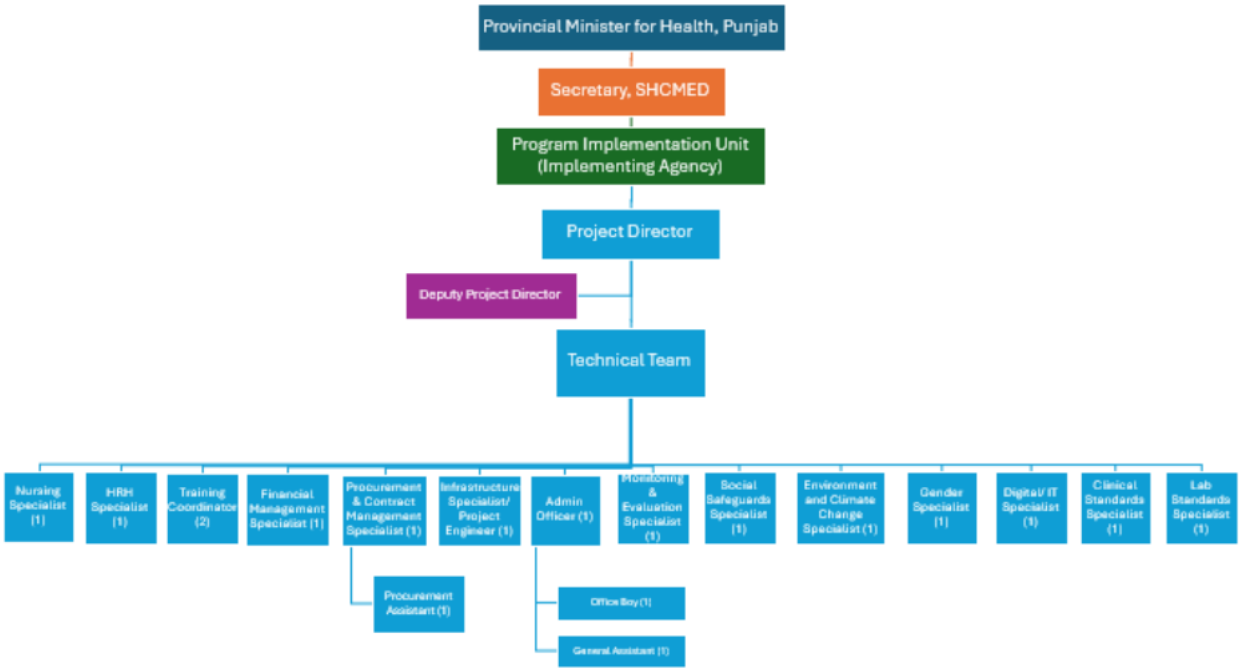
i. Research and device new policies for improvement in clinical services of teaching hospitals.
ii. Plan, design and prepare cost estimates, conduct cost monitoring, and forecast the new projects ensuring optimum utilization of hospital resources.
iii. Coordinate efforts to conceptualize and implement new ideas or innovations in healthcare services.
iv. Ensure seamless integration of new initiatives into existing systems and processes.
v. Facilitate collaboration among different teams and stakeholders involved in the implementation of reforms agenda and upgradation and enhancement of physical infrastructure of hospitals to meet modern standards and improve patient care.
vi. Supporting the procurement wing of SHC&MED for acquiring new equipment and services necessary for hospital upgrades and improvements.
vii. Support medical education wing to review the existing mechanism and structure of medical education system through Central Induction Policy of Level I, Level II, Level III, and Allied Health Professionals
viii. Oversee clinical education and professional practice development system and interventions design including operational plans, project preparation and support for decision-making
ix. Perform any other task assigned by the Specialized Healthcare & Medical Education Department

89. **Program Implementation Unit (PIU).** The review of PMU structure and approved PC-I revealed that many key expert positions including **social and environmental safeguard specialists** needed for ensuring compliance with outlined safeguard requirements of the international financial institutions (IFIs) like Asian Development Bank (ADB) and World Bank (WB) etc. are not included in the PMU. Therefore, it is recommended that a program implementation

unit with requisite expert staff position should be established for augmenting the capacity of the PMU and ensure that the implementation of the Health RBL Program is compliant with the policy requirements of the ADB.

90. The proposed structure of the PIU is given in Figure 27. Under the proposed scheme, hiring of dedicated environmental and social safeguards specialists in the PIU is envisaged to assist the implementing Agency (IA) in safeguards risk screening of the sites being selected and eligible for program interventions and establishing COE for nursing education under Output-2. The proposed safeguards staff in the PIU will assist the IA in screening of safeguards risks, conducting detailed assessment of environmental and social impacts, stakeholders' consultation and preparation of safeguards due diligence documents including IEEs, EMPs and RPs (if needed) to comply national regulations and safeguards policy requirements of the ADB. The respective safeguards expert will supervise and monitor implementation progress of social and environmental safeguard related interventions as well as occupational and community health and safety requirements including compliance with core labor standards (CLC). They will assist the PIU and IA in preparation and submission of periodic progress reports and consolidated safeguards monitoring reports separately for environment and social safeguards. In case of noted safeguards implementation gaps, the safeguards staff will assist the IA/EA in preparation and implementation of corrective action plans (CAPs) as needed and the IA/EA will be supported in establishing fully operational multi-tier program-based grievance redress mechanism (GRM).

Figure 27. Proposed Organogram of the PIU



3. Findings of Consultations with C&W Department and Infrastructure Development Authority Punjab (IDAP)

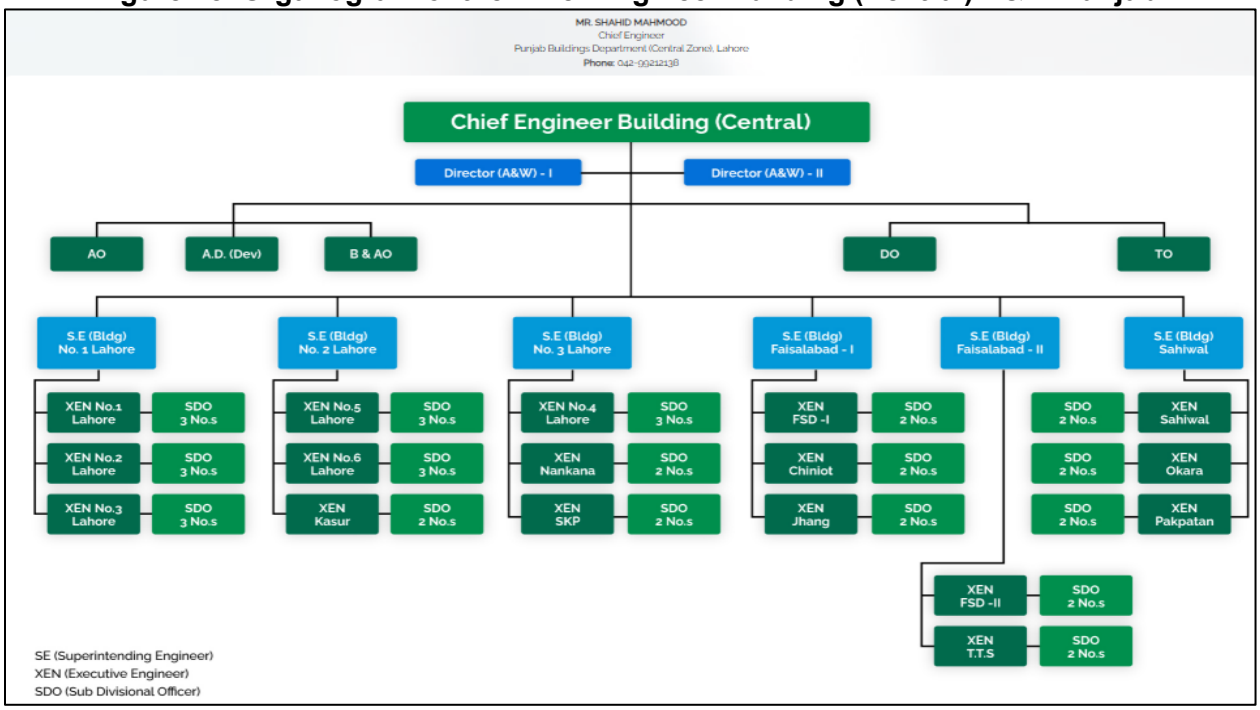
91. In Punjab, the public infrastructure development projects are mostly executed through the C&W Department and the Infrastructure Development Authority Punjab (IDAP). Therefore, the construction of the COEs for nursing education will have to be carried out through any of the said entities. Based on earlier experience in implementation of mega hospital projects with in-house safeguards management capacity it appears that the IDAP is better placed than the C&W Department for its selection to support IA in implementing the activities and works for establishing the COEs under output-2. However, the institutional capacity of both infrastructure development entities was reviewed to comprehend their capacity to handle environment and social safeguards aspects of the project during design and execution of the construction activities. Below are the review findings.

3.1 Buildings Department under Communication and Works Department (C&W Punjab)

92. The Punjab Communication & Works (C&W) Department has a long history, tracing back to the establishment of the Public Works Department (PWD) in 1854. The C&W Department was established in 1962 and bears the mandate for planning, executing, and maintaining all provincial roads, buildings and bridges. The C&W Department operated under administrative control of Secretary C&W department has the mandate for maintenance, rehabilitation and upgradation of existing and construction of new provincial roads infrastructure and public buildings infrastructure in the province. C&W has separate departments for roads infrastructure and for buildings infrastructure. Since the RBL program is aimed to construct new public buildings for establishing the COEs of nursing education, the Building Department of the C&W was reviewed.

93. The Building Department under the Punjab C&W is further subdivided into three zones – central, northern and southern. Each zone is headed by a chief engineer located in Lahore, Rawalpindi and Multan. The chief engineer's office for each zone has the same staffing including Superintendent Engineers (SE), Executive Engineers (EXEN) and Sub Divisional Officers (SDOs). Below is the organogram of the office of Chief Engineer Central, Lahore.

Figure 28. Organogram of the Chief Engineer Building (Central) C&W Punjab



94. The Buildings Department of C&W has units at the divisional and district level and its divisional and district level offices are headed by superintendent engineer (SE) and the executive engineer (EXEN) respectively. Besides ensuring repair and maintenance of existing government buildings, the Buildings Department of C&W is also engaged in construction of mega health projects like 200 bedded mother and child hospital Multan and upgradation of DHQ, Hafizabad. The office of Chief Engineer (Buildings) C&W Department takes the lead for tendering and award of civil works and supervises the construction activities at site either as executing agency or on behalf of other government entities like SHC&MED. During consultations, it was informed that the building department C&W has no in-house capacity for screening and assessment of social and environmental safeguards-related risks, preparation and implementation of safeguards due diligence documents including IEEs, EMPs, RPs, and safeguards monitoring reports for development projects etc. In case, the project requires preparation of environmental and social assessment reports including IEEs and EMPs, C&W will outsource such studies to experienced consulting firms. There is no dedicated GRM setup in the chief Engineer's office and its subordinate formation.

95. Under the existing system of C&W Department, engineering design, cost estimation, procurement of consultants, works contractors and equipment, and supervision of construction activities for COEs in Lahore, Multan and Rawalpindi will be executed through the respective zonal office of the Chief Engineer Building. If the SHC&MED selects buildings department in C&W Department to support the IA (PMU/PIU) for establishing the COEs then it will have to engage the offices of the (i) Chief Engineer's Building (Central) for Lahore COE, (ii) Chief Engineer Building (South) for Multan COE, and (iii) Chief Engineer Building (North) for Rawalpindi COE. Involvement of respective office of chief engineer building can help in preparing COE-specific engineering design, cost estimates and bidding packages for procurement of works contracts and consultants as needed for execution of the works. However, the risks related to safeguards noncompliance can be a matter of concern because the office of the Chief Engineer Buildings

lacks qualified and dedicated staff for environmental and social safeguards monitoring. Therefore, it is suggested that the EA (SHC&MED) / IA (PMU/PIU) should ensure that the qualified environmental and social safeguard experts' staff should be engaged and mobilized by the Chief Engineer Building, through design / construction supervision consultants for screening and assessment of safeguard risks and timely delivery of quality safeguards documents including IEES/EMPs and RPs (if needed). Further, it should be ensured that COE level GRM should be notified and operationalized in the office of the chief engineer or in the camp office established to execute and supervise the construction works for each COE.

3.2 The Infrastructure Development Authority Punjab (IDAP)

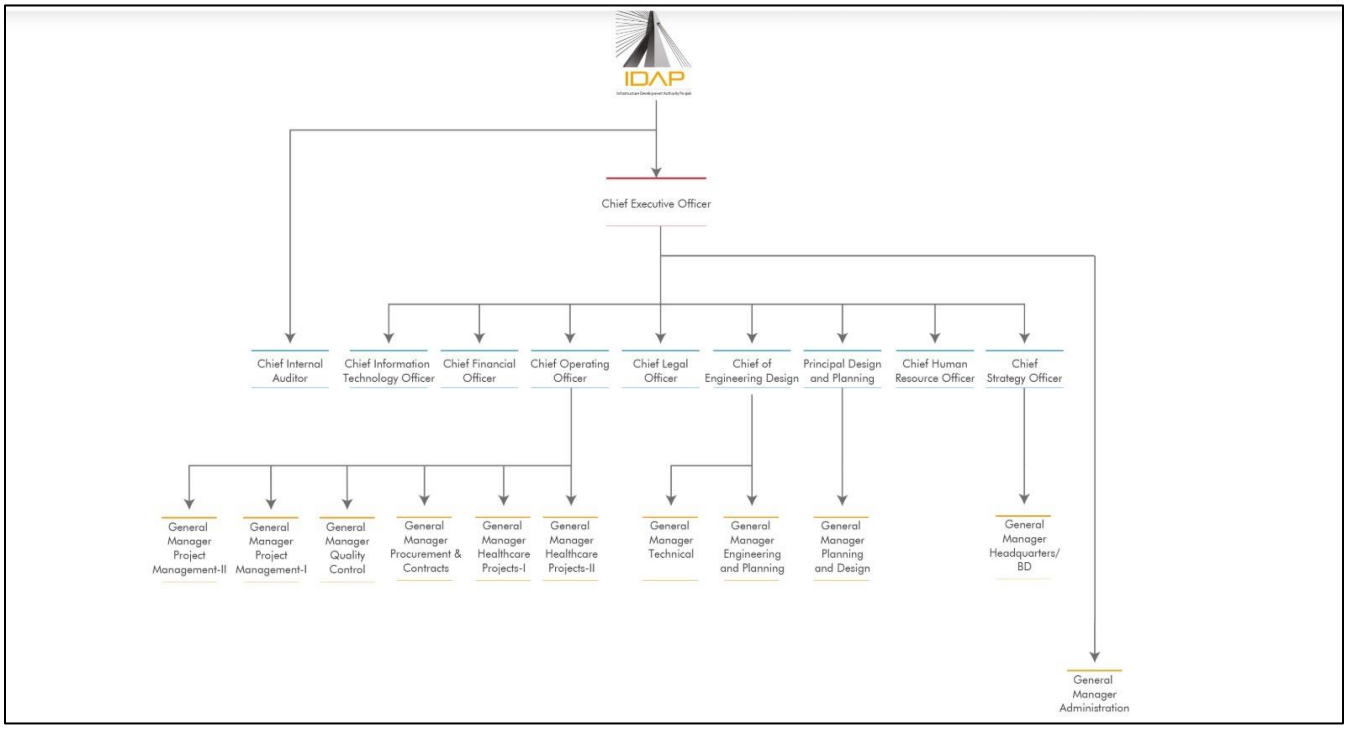
96. The IDAP was established in 2016 under the IDAP Act of 2016. The purpose of IDAP is to get large infrastructure projects executed efficiently, aesthetically, and transparently without compromising quality or entailing delays. In-house complete project management services including feasibility, design, contract management, execution, supervision, third-party evaluation, and delivery to the client department are the key features of IDAP.

97. IDAP offers a variety of services to various departments in areas including buildings (multipurpose for client departments), highways (roads, bridges, flyovers), public transport (mass transit solutions), water resources (irrigation infrastructure), public health (water supply, sewerage, water treatment plants, solid waste), housing (multipurpose housing, low-income housing) and energy infrastructure (thermal, hydel, solar, biomass, wind).

98. The Organogram of IDAP is provided in Figure 26. IDAP does not have a dedicated Environmental Unit, however, one Environmental Specialist operates under the General Manager (GM) Technical, while one Health, Safety, and Environment (HSE) Specialist works under the GM Quality Control. The Environmental Specialist is responsible for overseeing environmental matters at all stages of a project, from planning to operation. In contrast, the HSE Specialist primarily focuses on the construction phase, ensuring compliance with health, safety, and environmental standards. Both specialists are responsible for ensuring compliance with Pakistan's environmental legal framework across all projects.

99. At this stage, the environmental management system (EMS) is not established in IDAP, but the management is working on EMS establishment within the organization.

Figure 29. Organogram of IDAP



100. List of UWSCG safeguards specialists and their work experience is given in Table 6 below.

Table 6: List of IDAP Safeguard Specialists and their Work Experience

No.	Name	Work Experience	Position and contact information
1	Zille Huma	• 15 years of working experience in the environment sector • Experience in environmental protection and resettlement. • Work with donors: WB, ADB, other IFIs.	• **Position**: Manager Environment and Public Health • **Contact Info:** zille.huma@idap.pk
2	Khalid Khan	• 8 years of overall experience • Experience in Construction related HSE Projects	• **Position**: HSE Specialist

101. Currently IDAP implements only one recently awarded project. IDAP is serving as the executing agency for the construction of the LEED-certified Gold Standard Green Building in Gulberg II, Lahore. This project is part of the World Bank-funded Punjab Green Development Program (PGDP), which is executed by the Environment Protection Department. The building is designed to house the Environment Protection Department, Environmental Protection Agency, Environmental Monitoring Center, and allied entities.

102. In its role as the executing agency, IDAP oversees the design and construction of the building, ensuring adherence to sustainable building practices and international standards. The project's objectives include energy savings through green building concepts, waste reduction, efficient water usage compared to traditional office buildings, providing a healthy working

environment, reducing operating costs, minimizing resource utilization in terms of electricity, decreasing greenhouse gas emissions, and incorporating solar energy applications.

103. Additionally, IDAP has issued tenders for resident construction supervision and LEED certification consultancy services for this project, further emphasizing its commitment to delivering a high-quality, environmentally friendly infrastructure.

104. The Infrastructure Development Authority of the Punjab (IDAP) has undertaken a diverse array of projects across various sectors. Notable projects of IDAP is provided in Table 3 below.

Table 7. Implemented projects of IDAP

#	Implemented Projects	Year
Healthcare:		
1.	Pakistan Kidney and Liver Institute (PKLI) and Research Center	
2.	Recep Tayyip Erdogan Hospital (RTEH) Expansion Project, Muzaffargarh	
3.	Revamping of District Headquarters (DHQs) and Tehsil Headquarters (THQs) across Punjab	
4.	19 Hepatitis Prevention Treatment Clinics (HPTC) across Punjab	
5.	DHQ Hospital, Mianwali	
6.	General Hospitals in Attock, Layyah, and Bahawalnagar	
7	Establishment of Tertiary Care Hospital Nishtar - II, Multan	
8	Sardar Fateh Muhammad Khan Buzdar Institute of Cardiology, Dera Ghazi Khan	
9	Hazrat Hameed Uddin Hakim Sheikh Zayed Surgical Complex	
10	University of Child Health Sciences	
11	Establishment of 200 Beds Accidents and Emergency Center at PIMS, Islamabad	
12	Establishment of Federal Government Polyclinic (PGMI)-II at G/11/3, Islamabad	
13	Punjab Institute of Cardiology II, Lahore	
14	Pilot Program for HUB & Spoke Model at Zahir Pir, Rahim Yar Khan	
15	Establishment of Nawaz Sharif Institute of Cardiology, Sargodha	
16	Establishment of Nawaz Sharif Institute of Cancer Treatment and Research, Lahore	
Structural Engineering:		
17	Punjab Agriculture, Food and Drug Authority (PAFDA) Complex	
18	Punjab Forensic Science Agency (PFSA)	
19	Construction of Site Housing Complex and Auditorium for Quaid-e-Azam Thermal Power Plant (QATPL)	
20	Establishment of South Punjab Civil Secretariat and GOR at Multan	
21	Reconstruction of Lady Willingdon Hospital, Lahore	
22	Reconstruction of Old P&D Building, Lahore	
23	Construction of Green Building, Lahore	
24	Construction of New GOR Near DHA Phase IX, Lahore	
25	Net Zero Energy Building, Lahore	
26	Establishment of Model Fish Market, Lahore	
27	BOP Head Office Building, Lahore	
28	Construction of Circuit House, Rawalpindi	
29	Construction of Divisional Complex at Gujrat Phase 1, Package 1 (Divisional Complex and Allied Facilities)	
30	Establishment of Jinnah Public School, Pervez Elahi Campus, Gujrat	
Education:		
31	Establishment of University of Applied Engineering & Emerging Technologies (UAEET), Sambrial	
Entertainment:		
32	Immersive Wildlife Experience (Cinema & Moving Theatre) in Punjab	

105. For all projects, a consultant is hired to conduct the Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA). The role of the IDAP Environmental Specialist primarily involves reviewing these documents to ensure compliance with national environmental guidelines and regulatory requirements.

106. **Monitoring and reporting during construction phase.** Monitoring is conducted regularly in accordance with the Environmental Approval issued by the Environmental Protection Agency (EPA). However, it is not being carried out in alignment with the Environmental Management Plan (EMP). In case non-conformances are observed during the monitoring, IDAP issues letters to contractors or consultants instructing them to execute any missing works and rectify non-conformities identified during the monitoring process. IDAP prepares periodic environmental monitoring reports in accordance with national guidelines; however, these reports are primarily developed by the supervision consultant.

107. **Preparation and Evaluation of Tender Bids.** IDAP Environmental Specialist does not participate in the preparation of tender bids for Construction Contractor(s). Tender documents include EMP and its cost for realizing the environmental mitigation measures envisaged by the project and conducting internal monitoring. The Environmental specialist of IDAP does not participate in the evaluation of bids according to the special criteria for assessment of environmental performance of bidder.

108. **Permits and Clearances to be Obtained Prior to Start of Construction.** That depends on the type of project, however environmental clearance has been obtained in every project conducted by IDAP.

109. **Capacity building of IA/PIU.** The Environmental Specialist at IDAP possesses the capacity to successfully implement the Asian Development Bank's (ADB) Safeguard Policy Statement (SPS) and Results-Based Lending (RBL) program. However, there is a need to hire a Social Specialist and provide additional training to further enhance their skills, ensuring the effective implementation of ADB funded programs.

110. **Grievance Redress Mechanism.** No formal GRM system exists in the IDAP.

Appendix I: Punjab Nursing and Health Workforce Reform Project Consultation Mission (December 2024–March 2025)

List of Persons Met

#	Name	Designation
29-03-2025	**Meeting with SHC&MED**	
1	Dr. Wajid Ali	Additional Secretary
29-03-2025	**Meeting with Infrastructure Development Authority Punjab (IDAP)**	
2	Asif Raza	Chief Strategy Officer (CSO)
3	Ahsan Shamim	CFO
4	Khalid Khan	HSE Manager
5	Zilly-e-Huma	Environment Manager
21-12-2024	**Meeting with Nishtar 2 Hospital staff, Multan**	
6	Dr. Sania Batool	MS
7	Dr. Mahia	Consultant
8	Sonia Bibi	Nursing Supervisor
9	Engineer Sharoze	Procurement Officer
10	Mr. Younus	Nursing Supervisor
11	Dr. Qadeer	DMS
12	Dr. Fakhia Arbab	DMS Admin
21-12-2024	**Meeting with Nursing Staff of Nishtar Nursing College**	
13	Qamar-un- Nisa (Principal)	Principal
14	Shugufta Majeed	Senior Nursing Instructor
15	Qamar Mehmood	Office Superintendent
06-01-2025	**Meeting with Rawalpindi Medical University (RMU), Rawalpindi**	
16	Dr. Farhan Hassan	Dir Admin Maain Campus RMU.
17	Mr. Naveela Kausar	Principal College of Nursing, Holy Family Hospital
18	Ahmed Maqsood	Coordinator, ADP, RMU.
19	Dr. Shehzad Ahmed	Consultant to Vice-Chancellor RMU.
29-03-2025	**Meeting with C&W**	
20	Mr. Nayyar	Additional Secretary

Annex-XX Land title related documents about land parcel selected for COE at Lahore

{Record of correspondence and land title documents yet awaited from SHC&MED. If provided, relevant copies will be annexed.}

Appendix II: Copies of Correspondence and Land Title related documents for Nishter-2, Multan

OFFICE OF THE
DEPUTY COMMISSIONER
MULTAN

No. 49 /ADCR/HC,
Dated: 26 .02.2019.

The Commissioner,
Multan Division, Multan.

Subject:- **TRANSFER OF OWNERSHIP OF LAND FROM CITY DISTRICT GOVERNMENT, MULTAN NOW DISTRICT COUNCIL, MULTAN TO SPECIALIZED HEALTH CARE AND MEDICAL EDUCATION DEPARTMENT GOVERNMENT OF THE PUNJAB (NISHTAR-II, MULTAN).**

Kindly refer to your office letter No.Dir(Dev & F)-412/2018, dated 31.01.2019 addressed to Member(Colonies), Board of Revenue, Punjab, Lahore, on the subject noted above.

2. It is submitted that the Colonies Department, Govt. of the Punjab, Board of Revenue, Punjab, Lahore vide letter No.139-2019/39-CS-IV, dated 04.02.2019 accorded permission to enter the name of Specialized Healthcare and Medical Education (SHC & ME) Department in the column of " Cultivation" instead of Forest, Wildlife and Fishries Department against the state land measuring 320 Kanals,(40 Acres) situated in Mouza Balail, Tehsil Multan Saddar, District Multan(Copy enclosed). The mutation No.1264, dated 06.02.2019 has also been sanctioned in the revenue record, this regard(Copy enclosed).

3. As far as, the remaining land measuring 17 Acres, 07 Kanals & 18 Marlas, bearing Khasra No.9/23/1, 23/2, 24, 25, 10/21, 22, 23, 24, 25, 12/1, 13/1, 2, 3, 4, 5, 14/2, 3, 4 & 5 sitiated in Mouza Balail, Tehsil Multan Saddar, District Multan acquired for Amuzement Park by City District Government, Multan now District Council, Multan is concerned, the District Council, Multan has granted NOC for transfer of above said land in favour of Specialized Healthcare and Medical Education(SHC & ME) Department for establishment of Nishtar-II Multan vide letter No.57-DOR, dated 11.02.2019(Copy enclosed).

4. In view of the above, it is requested that the case for the transfer of land mensuring 17 Acres, 07 Kanals & 18 Marlas, situated in Mouza Balail, Tehsil Multan Saddar, District Multan, owned by City District Government, Multan now District Council, Multan already acquired for Amuzement Park in favour of Provincial Govt. for Specialized Health Care and Medical Education(SHC & ME), Department for establishment of Nishtar-II Multan may kindly be forwarded to Board of Revenue, Punjab, Lahore, for approval. It is further added that the Provincial Govt. will be entered in the column of ownership instead of City District Government, Multan and Specialized Health Care and Medical Education (SHC & ME), Department for establishment of Nishtar-II Multan will be entered in the column of Cultivation in the revenue record.

ADDITIONAL DEPUTY COMMISSIONER (REVENUE),
MULTAN

CC
1. The Senior Member, Board of Revenue, Punjab, Lahore.
2. The Principal Secretary to Chief Minister, Punjab, Lahore with reference to sanary dated 26.12.2018.
3. The Vice Chancellor, Nishtar Medical University & Hospital, Multan.
4. PSO to Special Secretary (D&F), SHC & ME Department, Lahore.
5. The Deputy Secretary (Colonies-I), BOR, Punjab, Lahore with reference to his letter No.139-2019/60-CS-IV, dated 04.02.2019.
6. The Planning Officer(DEV-V), Govt. of the Punjab, Specialized Healthcare Medical Education Department, Lahore.

Appendix III Copies of Correspondence and Land title related documents about Mother Care Child Hospital Rawalpindi.

{Record of correspondence and land title documents yet awaited from SHC&MED. If provided, relevant copies will be annexed.}

ANNEX 6: ENVIRONMENTAL ASSESSMENT AND REVIEW FRAMEWORK (EARF)

CURRENCY EQUIVALENTS

(As of 20 November 2024)

Currency unit	–	Pakistan rupee/s (PKR)
PKR 1.00	=	$0.0036
$1.00	=	PRs277.3

ABBREVIATIONS

ADB	–	Asian Development Bank
CE		Chief Engineer
CPID	–	Community participation and disclosure
CSOs	–	Civil society organizations
C&W	–	Communications and Works
GOP	–	Government of Pakistan
GOPb	–	Government of Punjab
GRC	–	Grievance redressal committee
GRM	–	Grievance redressal mechanism
IA	–	Implementing agency
NGOs	–	Nongovernment organizations
NOC	–	No objection certificate
PIU	–	Program Implementing Unit
PMU	–	Program Management Unit
REA	–	Rapid Environmental Assessment
RBL	–	Results-based lending
SPS	–	Safeguard Policy Statement
TOR	–	Terms of reference

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A. INTRODUCTION

1. Project Background

1. The Punjab Nursing and Health Workforce Reform Program (PNHWRP) in Pakistan intends to optimize health workforce availability, quality, and performance by supporting the availability of an adequately skilled health workforce to fulfill current and emerging health needs. This Results-Based Loan (RBL) project will be executed by the Punjab Specialized Healthcare and Medical Education Department (SHC&MED) as Executing Agency. SHC&MED will establish a lean program management unit with dedicated staff as the implementing agency.

2. At the heart of the program three state-of-the-art Centers of Excellence (COEs) for nursing education will be established in Lahore, Multan, and Rawalpindi. These COEs will embody the best international practices, featuring cutting-edge curricula, fully digital learning environments, advanced simulation labs, and climate-resilient infrastructure. They will also serve as degree-conferring institutions, attracting top talent through competitive admissions and cultivating a culture of academic and professional excellence. The COEs will align with global accreditation standards, such as those outlined by the World Health Organization (WHO) and the National League for Nursing.

3. The program's overarching goal is to optimize the availability, quality, and performance of the health workforce in Punjab, ensuring it can meet the current and emerging health needs of the population. This aligns with global efforts to achieve Universal Health Coverage (UHC) and Sustainable Development Goals (SDGs), particularly SDG 3 (Good Health and Well-Being) and SDG 5 (Gender Equality).

4. The key project outputs include:
- Output 1: Quality of nursing professionals improved
- Output 2: Climate-resilient and gender-sensitive COEs for nursing education established
- Output 3: Governance and management for health workforce strengthened

5. Planned activities under **output 1** will improve the quality of nursing professionals by enhancing faculty capacity, expanding specialized training, modernizing curricula, and establishing continuing professional education standards. It will also promote equitable access through digital linkages between the COEs and the province's 44 public nursing colleges.

6. The **output** will support the construction and operationalization of three climate-resilient and energy-efficient COEs in Multan, Lahore, and Rawalpindi, complete with simulation labs, digital learning platforms, and student hostels. These COEs will serve as regional training hubs for undergraduate, postgraduate, and short-term specialized nursing programs. Meanwhile, the **output 3** will strengthen governance and management of the nursing workforce by establishing an independent management and quality assurance entity for the COEs, integrating nursing education data into the provincial HRMIS, and introducing policy and regulatory reforms to support workforce planning, accountability, and private sector participation.

7. Only output 2 of the PNHWRP RBL program will invest on development of three new state-of-the-art Centers of Excellence (COEs) for nursing education in Lahore, Multan, and Rawalpindi. The project activities and works are subject to compliance with the national and provincial legal frameworks and the safeguard policy requirements of the ADB.

8. The present report provides a detailed assessment of environmental impacts and risks for the establishment of Centers of Excellence (COEs) and associated environmental related risks

likely due to planned construction activities. It also includes review of institutional setup and its safeguards management capacity and findings of the consultation meetings conducted with responsible government entities.

9. At the moment, there is incomplete information available on the typology of construction works of the selected sites or the design features of the Centers of Excellence (COEs). The typical construction activities can include:

- **a)** **Pre-Construction**: Site preparation, surveying, soil testing, design, approvals, material procurement; fencing and provision of temporary utilities;
- **b)** **Foundation Work:** Mark layout, excavate, dewatering (if needed), piling or shallow foundation, lay footings, raft slabs, apply waterproofing and anti-termite treatment;
- **c)** **Superstructure Construction:** Build basement (if required), construct ground floor slab, columns, repeat floor - wise: columns → beams/slabs → curing, build staircases, brickwork & partitions, build internal/external walls, install lintels and sills, seal and cure walls;
- **d)** **MEP Installations:** Electrical wiring and conduits, plumbing and sanitation, HVAC, fire safety, elevators/escalators;
- **e)** **Finishing Work:** Internal/external plastering, false ceilings, wall putty, and primer, flooring and tiling, painting;
- f) **Doors, Windows & Fixtures:** Install door/window frames and panels, fit kitchen and bathroom fixtures, add electrical switches and lights;
- **g)** **External Works:** Build compound walls and gates, paving, parking, walkways, Landscaping and drainage;
- **h)** **Final Finishing:** Clean-up, inspections, and handover.

10. The environmental assessment and review framework (EARF) identified the likely impacts for ongoing RBL Program. Based on the nature of the proposed activities, the resulting insignificant impacts are category B. In addition, for the Punjab Nursing and Health Workforce Reform Project (PNHWRP) consultants were recruited to carry out field surveys and detailed engineering design, design supervision, and construction environmental and social supervision.

11. The development of the Punjab Nursing and Health Workforce Reform Project (PNHWRP) under the RBL program will trigger ADB's environment safeguards policies.[7]

12. The implementation arrangements are discussed in detail in the project implementation document (PID).[8]

2. Purpose of Environmental Assessment and Review Framework

13. The present EARF aims to provide guidance on safeguard screening, assessment, institutional arrangements, and processes to be followed for components of the project, where design and/or activity selection takes place after ADB Board approval. The activity selection will be in accordance with the environmental activity selection criteria as outlined in the EARF. The implementing agency (**Project Management Unit (PMU)** and **Project Implementing Unit (PIU) of the SHC&MED**) will agree with ADB on screening and categorization, environmental assessment, preparation and implementation, monitoring of the activities to facilitate compliance

[7] ADB. 2009. Safeguard Policy Statement. Manila.

[8] ADB. Project Implementation Document. Annex 4 to the Report and Recommendation to the President of this project. Internal working document.

with the requirements specified in ADB Safeguard Policy Statement 2009 (ADB SPS 2009) and government rules and environmental laws for overall PNHWRP RBL program.

14. The present EARF guides each subproject's selection, screening and categorization, environmental assessment, preparation of national IEE reports, and implementation of environmental management plan (EMP). The EARF:

(i) describes the program and its components;
(ii) includes environmental criteria to be used in selecting subprojects and/or components to be funded under PNHWRP RBL program;
(iii) specifies the environmental laws, rules and regulations, statutory clearances to be obtained and applicable environmental standards;
(iv) specifies the requirements in subproject screening and categorization, assessment, and planning;
(v) explains the anticipated environmental impacts of the subprojects and recommends mitigation and monitoring measures;
(vi) specifies requirements for asbestos management and provides the outline asbestos management plan;
(vii) Includes requirement for using tools such as integrated biodiversity assessment tool (IBAT) as used by ADB[9] in order to screen for likelihood of critical habitat areas for subsequent/indicative projects, and recommendations during implementation;
(viii) specifies requirements for meaningful consultations with affected persons and other stakeholders, grievance redressal mechanism, and information disclosure;
(ix) indicates capacity development for the project management and implementing agencies and other stakeholders;
(x) provides safeguards institutional arrangements, roles, and responsibilities; and
(xi) specifies monitoring and reporting requirements including sample checklists and templates;
(xii) assesses the capability of the project proponents to implement national laws and ADB's requirements, and identifies needs for capacity building.

15. This updated EARF provides guidance towards environmental assessment and reporting requirements to comply with both ADB and government policies. The EARF will be reviewed from time to time (i.e., ADB review missions) and, if necessary, updated during implementation especially if unanticipated impacts arise or if there is any change in scope or change in legal and regulatory frameworks. None of the provisions of EARF will be relaxed or lowered in the subsequent revisions and updates.

3. Environmental Categorization and Assessment

16. The program has been classified as category B for environment. Every subproject to be included in this RBL Program will be screened to confirm its environment category based on-site selection criteria. Under the program, no high-risk activities classified as Category A—requiring the preparation of an Environmental Impact Assessment (EIA) in accordance with the ADB Safeguard Policy Statement (SPS) 2009—shall be permitted. Category A activities are those that have the potential to generate significant adverse environmental and social impacts. To ensure such activities are excluded from the program, screening will be conducted by the Implementing Agency's Project Implementation Unit (IA-PIU) under SHC&MED. The screening process will

[9] EAs/IAs may provide ADB with locations and GPS coordinated to run IBAT for biodiversity information during screening stage.

utilize the ADB Rapid Environmental Assessment (REA) checklists for buildings, as provided in Appendix-1. For each proposed activity, a checklist will be completed to determine its environmental category. This checklist will also include a justification for the assigned category.

17. As part of the screening activity, IA must apply the ADB's Prohibited Investment Activities List (PIAL) and must ensure the condition of permitting purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20% is satisfied by making it mandatory to:

(i) conduct an assessment of the existing structures that need to be demolished/removed, to evaluate the risk of asbestos presence; and
(ii) implement a screening of procurement procedures to ensure that asbestos-containing materials will not be used and/or financed by the project.

18. The IEE for selected sites for COEs per Punjab EPA regulations is mandatory and required in accordance with the Punjab Environmental Protection Act 2012 IEE/EIA Regulations 2022. According to this rule, the sites for establishment of COE fall under Schedule I, subsection I, where the IEE will be required as well as obtaining of approval from the Environmental Protection Agency (EPA Punjab). The approved IEE reports along with EMP, together with the approval from the Environmental Protection Agency of Punjab (EPA Punjab) will be included in the bid and contract documents. The site-specific environmental management plans (SSEMPs) will be developed based on existing EMPs by the contractors for subprojects for monitoring purposes during subprojects implementation.

B. ASSESSMENT OF LEGAL FRAMEWORK AND INSTITUTIONAL CAPACITY

19. This section provides an overview of applicable national and provincial legislation and international policy framework for the proposed project. The Punjab Nursing and Health Workforce Reform Project will comply with all national legislation related to environment applicable to projects being executed in the province of Punjab to acquire the necessary regulatory clearances from Environment Protection Agency (EPA), Punjab. To resolve any gaps between the two sets of instruments, i.e. Pakistan's national/provincial and ADB's SPS 2009, the EARF provides measures to reconcile and address the gaps in a manner consistent with SPS 2009's compliance requirements.

1. National Policy and Legal Framework

20. In March 1992, the National Conservation Strategy (NCS) was approved by the federal cabinet. This strategy has been identified as the principal document on environmental issues in Pakistan (IUCN, 1992). It defines the primary approach of the country to achieve sustainable development, conservation of natural resources and efficiency in their use as well as natural resource management. The strategy highlights 14 core areas that required crucial policy interventions to preserve the natural and physical environment of Pakistan. Among these core areas, the subjects related to proposed development include pollution abatement and control and increase energy efficiency meanwhile conserving biodiversity.

21. Prior to the adoption of the 18th Constitutional Amendment, the Pakistan Environmental Protection Act (PEPA) 1997 was the governing law for environmental conservation in the country. Under PEPA 1997, the Pakistan Environmental Protection Council (PEPC) and Pak EPA were primarily responsible for administering PEPA 1997. Following the adoption of the 18th Constitutional Amendment in 2011, the subject of environment was devolved, and the provinces have been empowered for environmental protection and conservation. Subsequently, the Punjab

government amended PEPA 1997 as Punjab Environmental Protection (Amendment) Act 2012, and Punjab EPA (PEPA) is responsible for ensuring the implementation of provisions of the Act in Punjab's territorial jurisdiction. PEPA has also formulated provincial Environmental Quality Standards (PEQS) which are also required to ensure compliance with these standards and establish monitoring and evaluation systems.

2. Regulations for Environmental Assessments

22. Projects with moderate impacts are expected to trigger the need to conduct environmental assessments and prepare the national IEE. In accordance with the Punjab Environmental Protection Act 2012 IEE/EIA Regulations 2022, the sites for establishment of COE education institution fall under Schedule I, subsection I, where the IEE will be required as well as obtaining of approval from the Environmental Protection Agency (EPA Punjab).

3. Guidelines for Environmental Assessments

23. Pakistan Environmental Protection Agency has also established a set of environmental guidelines for conducting environmental assessments and the environmental management of different types of development projects. The guidelines that are relevant to the proposed project are listed below:

- Guidelines for the Preparation and Review of Environmental Reports, Pakistan, EPA 1997
- Guidelines for Public Consultations - Pakistan EPA, May 1997

4. Punjab Environmental Quality Standards, 2016

24. Punjab Environmental Quality Standards, 2016 specify the following standards:

- Maximum allowable concentration of pollutants (32 parameters) in municipal and liquid industrial effluents discharged to inland waters, sewage treatment facilities, and the sea (three separate sets of numbers)
- Maximum allowable concentration of pollutants (16 parameters) in gaseous emissions from industrial sources
- Maximum allowable concentration of pollutants (two parameters) in gaseous emissions from vehicle exhaust and noise emission from vehicles
- Maximum allowable noise levels from vehicles

25. These standards apply to the gaseous emissions and liquid effluents discharged by batching plants, campsites, and construction machinery. The standards for vehicles will apply during the construction as well as the operation phase of the project. Standards for ambient air quality have also been prescribed.

5. Punjab Hospital Waste Management Rules, 2014

26. These rules, notified by the Environmental Protection Department under the Punjab Environmental Protection Act (2012). The Punjab Hospital Waste Management Rules, 2014 aim to ensure the safe handling, segregation, treatment, and disposal of hazardous healthcare waste to protect public health and the environment. These rules apply to all healthcare facilities in Punjab, including hospitals, clinics, labs, and waste contractors. The key points that covered by Punjab hospital waste management rules are as under:

i. Mandatory Segregation at Source

- All healthcare waste must be separated at the point of generation into categories (general, infectious, sharp, pathological, pharmaceutical, chemical, radioactive) using color-coded bins.

ii. Color-Coded Waste Bins

- Yellow: Infectious waste
- Red: Pharmaceutical waste
- Blue: Glass and recyclables
- White/Puncture-proof: Sharps
- Black: General waste

iii. Safe Collection and Internal Transportation

- Waste should be collected daily (at least twice) in leak-proof containers and transported in closed trolleys/carts with no manual handling of loose waste

iv. Secure Storage of Waste

- Each healthcare facility must have a designated, labeled temporary storage area (often called a "Yellow Room") that meets hygiene, ventilation, and safety standards.

v. Approved Waste Treatment Methods

- Infectious waste must be incinerated or treated by autoclaving, microwaving, or chemical disinfection before final disposal.

vi. Final Disposal Requirements

- Treated waste can be sent to landfills.
- Untreated infectious waste must not be mixed with general municipal waste or dumped illegally.
- Sharps must be shredded or encapsulated before disposal.

vii. Institutional Responsibility

- Every healthcare facility (public or private) must appoint a Waste Management Officer (WMO) responsible for implementation and compliance.

viii. Training and Awareness

- All hospital staff involved in handling waste (doctors, nurses, janitors, transporters) must receive regular training on hospital waste management procedures and safety.

ix. Monitoring and Record-Keeping

- Healthcare facilities must maintain proper records of waste generation, treatment, and disposal, and submit reports to authorities when required.

x. Enforcement and Penalties

- The Punjab Environmental Protection Agency (EPA) oversees compliance. Noncompliance can lead to fines, license suspension, or legal action under the Punjab Environmental Protection Act, 2012.

6. Other National and Provincial Legislations and Guidelines

27. Table 1 provides a summary of other applicable legislation and guidelines.

Table 1: Summary of Applicable National Legislations and Guidelines

Legislation/Guideline	Description
National Environmental Policy (2005)	This is the primary policy that addresses environmental issues of the country. The broad Goal of NEP is, "to protect, conserve and restore Pakistan's environment in order to improve the quality of life of the citizens through sustainable development". The NEP identifies a set of sectoral and cross-sectoral guidelines to achieve its goal of sustainable development. It also suggests various policy instruments to overcome the environmental problems throughout the country.
The Forest Act (1927) & The Punjab Forest Act (1999)	The Act empowers the provincial forest departments to declare any forest area as reserved or protected. It empowers the provincial forest departments to prohibit the clearing of forest for cultivation, grazing, hunting, removing forest produce, quarrying and felling, lopping and topping of trees, branches in reserved and protected forests. The proposed project passes along a mix of urban and rural areas where no declared reserved or protected forest is situated in the Project area. Punjab Forest Act provides provisions on producing forests, sale of timber, firewood, protection and conservation of land and natural resources, duty levy able on timber and other forest produce, joint forest management and participation and other forest produce, joint forest management and participation of stakeholders, management of public, communal and private forests, environmental and Biodiversity concerns, wildlife and ecosystem management.
The Punjab Plantation and Maintenance of Trees Act (1974)	This act ensures the protection of maintenance of tree plantations raised by public or private individuals on the land, roadsides, or canal banks.
Cutting of Trees Act (1992)	**It prohibits cutting, felling of damaging a tree without information and permission of concerned authorized officer (provincial Forest officer). Cutting of trees is a cognizable crime according to this act, without permission of concerned department and on violation; the violator could be charged and presented to court of law for paying penalties. The act repealed the previous Cutting of Trees Act, 1975.**
Motor Vehicle Rules (1969)	It provides guidelines and regulations about driving and registration of motor vehicles. This act empowers Punjab Motor Vehicle Registration Authority to enforce the rules and regulations.
Punjab Environmental Protection (Motor Vehicles) Rules, 2013	Subject to the provisions of this act, and the rules and regulations, no person shall operate a motor vehicle from which air pollutants and noise are being emitted in an amount, concentration, or level that is in excess of the Punjab Environmental Quality Standards, or where applicable the standards established under clause (g) of subsection (1) of section 6 of the act.
Highways Safety Ordinance (2000)	This ensures safe driving on highways to maintain safety on the highways for protecting human lives and property. The ordinance covers regulations about driving licenses, registration of vehicles, fitness of vehicles running on the highways, control of traffic, speed limits, and traffic signs, emission of smoke, grease, and noise by vehicles.
The Punjab Explosives Act (1884, amended 2014)	This ensures licensing and safe handling of explosive materials required for use during the construction phase of the project. It also addresses aspects related to safe disposal.
Canal and Drainage Act (1873)	This ensures prevention of pollution of natural or man-made water bodies such as irrigation and drainage canals, lakes, water courses and other water bodies. This Act empowers the Government of Punjab to control the water of all rivers, lakes, subsoil and streams flowing in natural channels within the provincial territory.
Pakistan Antiquities Act 1975 & Punjab Antiquities Amendment Act 2012	It ensures the protection, preservation, development and maintenance of antiquities. The Act defines "antiquities" as ancient products of human activity, historical sites, or sites of anthropological or cultural interest, national monuments, etc. The Act is designed to protect these antiquities from destruction, theft, negligence, unlawful excavation, trade, and export. The law prohibits new construction in the proximity of a protected antiquity and empowers the government to prohibit excavation in any area that may contain articles of archaeological significance.

Pakistan Penal Code (1860)	It defines the penalties including fines/ imprisonment for violations concerning pollution of air, water bodies and land.
Punjab Restriction on Employment of Children Act, 2016	According to subsection 11(a) of this Act, an occupier who employs or permits a child (person under the age of 15 years) to work in an establishment shall be liable to punishment with imprisonment for a term which may extend to six months, but which shall not be less than seven days, and a mandatory fine between 10,000 and 50,000 rupees.
The Punjab Occupational Safety and Health Act, 2019	This Act entails the provision of occupational safety and health for the workers at the workplace and protects them against risks arising out of occupational hazards; to promote a safe and healthy working environment catering to the physiological and psychological needs of the employees at the workplace.
Labor Laws as part of the Constitution of Pakistan, 1973	The Constitution of Pakistan contains a range of provisions with regard to labor rights, in particular: ▪ Article 11 of the Constitution prohibits all forms of slavery, forced labor and child labor; ▪ Article 17 provides a fundamental right to exercise the freedom of association and the right to form unions; ▪ Article 25 lays down the right to equality before the law and prohibition of discrimination on the grounds of sex alone; and ▪ Article 37(e) makes provision for securing just and human conditions of work, ensuring that children and women are not employed in vocations unsuited to their age or sex, and for maternity benefits for women in employment. ▪ Labor law is controlled at both provincial and national levels with compulsory employment agreements containing the terms set out by the labor laws. The labor laws are a comprehensive set of laws in Pakistan dealing with the following aspects: – Contract of Employment; Termination of Contract; – Working Time and Rest Time; – Working hours; – Paid Leave; – Maternity Leave and Maternity Protection; – Other Leave Entitlements; – Minimum Age and Protection of Young Workers; – Equality – Pay Issues; – Workers' Representation in the Enterprise; – Trade Union and Employers Association Regulation; and – Other Laws.

7. Comparison of International and Local Environmental Legislations

28. The ADB SPS requires the application of pollution prevention and control technologies and practices consistent with best international practices, as reflected in internationally recognized standards. The SPS states that when host country regulations differ from these standards, the EA will achieve whichever is more stringent. A comparison of applicable local and international guidelines for ambient air quality has been provided in Table 2 below.

7.1 Air Quality Standards

29. The comparison showed that WHO standards are stringent for air quality parameters including SO2, NO2, O3, PM10 and PM2.5. However, for CO PEQS are more stringent than WHO and for rest of air quality parameters including NO, SPM and Lead the WHO standards are not available hence the PEQS standards were used.

Table 2: Comparison of International and Local Air Quality Standards

Pollution	USEPA		WHO		Punjab Environmental Quality Standards, 2016	
	Average time	Standards	Average time	Standards	Average time	Standards
SO2	3 hours	0.5 ppm	24 hours	40 µg/m^3	Annual Mean	80 µg/m^3
	1 hour	75 ppm	-	-	24 hours	120 µg/m^3
CO	8 hours	9 ppm (11 mg/m^3)	8 hours	10 mg/m^3	8 hours	5 mg/m^3
	1 hour	35 ppm (43 mg/m^3)	1 hour	35 mg/m^3	1 hour	10 mg/m^3
NO2	Annual mean	100 µg/m^3 (53 ppb)	Annual mean	10 µg/m^3	Annual Mean	40 µg/ m^3
	1 hour	100 ppb	1 hour	200 µg/ m^3	-	-
	-	-	24 hours	25 µg/ m^3	24 hours	80 µg/ m^3
O3	8 hours	0.07 ppm^3 (148 µg/ m^3)	8 hours	100 µg/ m^3	1 hour	130 µg/ m^3
PM10	24 hours	150 µg/ m^3	1 year	15 µg/ m^3	Annual mean	120 µg/ m^3
			24 hours	45 µg/ m^3	24 hours	150 µg/ m^3
PM2.5	Annual mean	15 µg/m^3	1 year	5 µg/ m^3	Annual average	15 µg/ m^3
					24 hours	35 µg/ m^3
	24 hours	35 µg/ m^3	24 hours	15 µg/ m^3	1 hour	15 µg/ m^3

7.2 Noise Quality Standards

30. For noise quality, the PEQS standards are as stringent as the WHO/IFC standards. Hence, the noise quality was compared with PEQS. Further, the IFC EHS guidelines advise that where existing ambient noise levels already exceed thresholds, the project should not result in an increase of more than 3 dB over existing ambient noise at the nearest receptor location off-site.

Table 3: Comparison of International and Local Noise Standards

Category of Area/ Zone	Limit in dB(A) Leq			
	PEQS		WHO/ IFC	
	Day time	Night time	Day time	Night time
Residential area (A)	55	45	55	45
Commercial area (B)	65	55	70	70
Industrial area (C)	75	65	70	70
Silence Zone (D)	50	45	55	45

7.3 Water Quality Standards

31. The drinking water quality standards including PEQS, WHO, and US EPA standards were compared for ground water quality. The comparison showed that PEQS is as stringent as WHO and USEPA for all drinking water quality parameters except for antimony, arsenic, cadmium, Lead, phenolic compounds and zinc for which WHO is more stringent. For wastewater quality,

the PEQS, WHO and US EPA standards were compared. The results showed that USEPA standards are more stringent for arsenic, boron, cadmium, chlorine and mercury. For all the other parameters PEQS are stringent. As far as surface water quality parameters are concerned, WHO and USEPA standard are not available for all parameters tested hence the local regulations, i.e., PEQS take precedence over any other available standards as the PEQS are available for all parameters tested. Moreover, the PEQS standards are also acceptable to Punjab EPA. Therefore, PEQS are used for surface water, drinking water, and wastewater quality.

Table 4: Comparison of International and Local Drinking Water Quality Standards

#	Parameter	PEQS (mg/L)	WHO (mg/L)	USEPA (mg/L)
Chemical Parameters				
1.	Aluminum (Al)	< 0.2	0.2	0.05 – 0.02
2.	Ammonium (NH3)	–	1.5	NS
3.	Antimony (Sb)	< 0.005	0.005	0.006
4.	Arsenic (As)	< 0.05	0.01	0.05
5.	Barium (Ba)	0.7	0.7	2.0
6.	Boron (B)	0.3	0.3	NS
7.	Cadmium (Cd)	0.01	0.003	0.005
8.	Chloride (Cl)	< 250	250	250
9.	Chromium (Cr)	< 0.05	0.05	0.1
10.	Copper (Cu)	2	1 – 2	1.0
11.	Cyanide (CN)	< 0.05	0.07	0.2
12.	Fluoride (F)	< 1.5	1.5	2.0 – 4.0
13.	Iron (Fe)	–	0.3	0.3
14.	Lead (Pb)	< 0.05	0.01	0.015
15.	Manganese (Mn)	< 0.5	0.1 – 0.5	0.05
16.	Mercury (Hg)	< 0.001	0.001	0.002
17.	Molybdenum (Mo)	–	0.07	NS
18.	Nickel (Ni)	< 0.02	0.02	0.1
19.	Nitrate (NO3)	< 50	NS	10.0 as N
20.	Nitrite (NO2)	< 3	NS	10.0 as N
21.	Selenium (Se)	0.01	0.01	0.05
22.	Silver (Ag)	–	NS	0.1
23.	Sodium (Na)	–	200	20
24.	Sulphate (SO3)	–	250	250
25.	Residual Chlorine	0.2 – 0.5	–	–
26.	Zinc (Zn)	5.0	3.0	5.0
Physical Parameters				
27.	Color	< 15 TCU	15 CU	15 CU
28.	Taste	Non-objectionable/ Acceptable	–	–
29.	Odour	Non-objectionable/ Acceptable	NS	3 TON
30.	Turbidity	< 5 NTU	5 NTU	0.5 – 5.0 NTU

#	Parameter	PEQS (mg/L)	WHO (mg/L)	USEPA (mg/L)
31.	Total hardness	< 500 mg/L	–	–
32.	Total dissolved solids (TDS)	< 1000 mg/L	1000 mg/L	500 mg/L
33.	pH	6.5 – 8.5	6.5 – 8.5	6.5 – 8.5
Biological Parameters				
34.	E. coli	Must not be detectable in any 100 ml sample	0	0
35.	Total Coliforms	Must not be detectable in any 100 ml sample	0	0

CU = color units, NS = Not Specified, NTU = Nephelometric Turbidity Units, PEQS = Punjab environmental quality standards, TCU = True Color Units, TON = Threshold Odor Number, USEPA = United States Environmental Protection Agency, WHO = World Health Organization
Source: Government of Punjab (2016). *Punjab Environmental Quality Standards for Municipal and Liquid Industrial Effluents*; World Health Organization (WHO). 2011. *Guidelines for Drinking water Quality*, 4th Edition; U.S. Environmental Protection Agency (USEPA). 2014. *Water Quality Standards Handbook*.

Table 5: Comparison of National and International Surface Water Standards

#	Parameter	Units	PEQS (National)	WHO Class V Standards (Agriculture)	FAO Standards (Agriculture)
1	Temperature	°C	–	–	–
2	pH	pH unit	6–9	< 5.3	6.0–8.5
3	COD	mg/L	150	> 30	–
4	Biochemical Oxygen Demand, 5-day (BOD_5)	mg/L	80	–	–
5	Solids, Total Dissolved (TDS)	mg/L	3500	–	0–2000
6	Solids, Total Suspended (TSS)	mg/L	200	–	–
7	Chloride	mg/L	1000	–	0–1065
8	Fluoride (F^-)	mg/L	10	–	–
9	Oil & Grease	mg/L	10	–	–
10	Phenols, Total (Phenolic Compounds)	mg/L	0.10	–	–
11	Cyanide (CN^-)	mg/L	1.00	–	–
12	Anionic Detergents as MBAS	mg/L	20.00	–	–
13	Sulfate (SO_4^{2-})	mg/L	600	–	0–960
14	Sulfide (S)	mg/L	1.00	–	–
15	Ammonia (NH_3)	mg/L	40.00	–	–
16	Cadmium (Cd)	mg/L	0.10	> 0.0039 mg/L	–
17	Chromium (Cr) as Hexavalent & Trivalent	mg/L	1.00	> 0.016 mg/L	–
18	Copper (Cu)	mg/L	1.00	> 0.018 mg/L	–
19	Lead (Pb)	mg/L	0.50	> 0.082 mg/L	–
20	Nickel (Ni)	mg/L	1.00	> 1.4 mg/L	–
21	Zinc (Zn)	mg/L	5.00	> 0.12 mg/L	–
22	Iron (Fe)	mg/L	8.00	–	–
23	Manganese (Mn)	mg/L	1.50	–	–
24	Selenium (Se)	mg/L	0.50	–	–
25	Silver (Ag)	mg/L	1.00	–	–
26	Arsenic (As)	mg/L	1.00	> 0.36 mg/L	–

#	Parameter	Units	PEQS (National)	WHO Class V Standards (Agriculture)	FAO Standards (Agriculture)
27	Barium (Ba)	mg/L	1.50	–	–
28	Sodium (Na)	mg/L	–	–	0–920
29	Boron (B)	mg/L	6.00	–	0–2
30	Mercury (Hg)	mg/L	0.01	> 0.0024 mg/L	–
31	Chlorine	mg/L	1.00	–	–
32	Total Toxic Metals	mg/L	2.00	–	–
33	Nitrogen	mg/L	–	–	–
34	SAR (Sodium Adsorption Ratio)	mmole/L	–	–	–
35	Ecw (Electrical Conductivity)	µS/cm	–	–	–

FAO = Food and Agriculture Organization, PEQS = Punjab Environmental Quality Standards, WHO = World Health Organization

Source: Government of Punjab (2016). *Punjab Environmental Quality Standards for Municipal and Liquid Industrial Effluents*; World Health Organization (WHO). 2017. *Guidelines for Safe Use of Wastewater, Excreta and Greywater*, Volume II: *Wastewater Use in Agriculture*; Ayers, R.S., and Westcot, D.W. (FAO). 1985. *Water Quality for Agriculture* (Irrigation and Drainage Paper 29).

Table 6: Comparison of International and Local Wastewater Quality Standards

Sr. No.	Parameter	PEQS (mg/L)	NEQS (mg/L)	USEPA (mg/L)
Chemical Parameters				
1	Ammonia	40	40	10
2	Arsenic	1	1	0.5
3	Barium	1.5	1.5	–
8	Biochemical Oxygen Demand, 5-day (BOD_5)	80	80	30
9	Boron	6	6	1
10	Cadmium	0.1	0.1	0.03
11	Chloride	1000	1000	–
12	Chlorine	1	1	0.5
13	Chromium	1	1	2
14	COD	150	150	160
15	Copper	1	1	3
16	Cyanide	1	1	1
17	Fluoride	10	10	15
18	Ionic detergents as Methylene Blue Active Substances (MBAS)	20	20	–
19	Iron	8	8	10
20	Lead	0.5	0.5	1
21	Manganese	1.5	1.5	10
22	Mercury	0.01	0.01	0.005
23	Nickel	1	1	1
24	Oil & Grease	10	10	10
25	Phenolic compounds	0.1	0.1	1
26	Selenium	0.5	0.5	0.5
27	Silver	1	1	0.5
28	Sulfate	600	600	–

Sr. No.	Parameter	PEQS (mg/L)	NEQS (mg/L)	USEPA (mg/L)
Chemical Parameters				
29	Sulfide	1	1	1
30	Total Toxic Metals	2	2	–
31	Zinc	5	5	5
Physical Parameters				
32	pH	9	9	6–9
33	Total Suspended Solids (TSS)	200	200	30
34	Total Dissolved Solids (TDS)	3500	3500	–

FAO = Food and Agriculture Organization, NEQS = National Environmental Quality Standards (Pakistan), PEQS = Punjab Environmental Quality Standards, USEPA = United States Environmental Protection Agency, WHO = World Health Organization.
Sources: Government of Punjab (2016). *Punjab Environmental Quality Standards for Municipal and Liquid Industrial Effluents*; Government of Pakistan (2000). *National Environmental Quality Standards for Municipal and Liquid Industrial Effluents*; U.S. Environmental Protection Agency (USEPA). 2014. *Water Quality Standards Handbook*.

7.4 Vibration Standards

32. Table 7 presents the maximum permissible vibration levels for construction phase which have no risk of damage to buildings. These limits apply to vibration frequencies below 15Hz where the most conservative limits are required and are presented for both transient and continuous vibrations. For protected or potentially vulnerable buildings, the recommended construction vibration limit is reduced by half.

33. The most common and frequent structural damage from man-made sources occurs in the frequency range from 1 to 150 Hz.

Table 7: Maximum Permissible Construction Phase Vibration Levels

Building Type	Vibration Limit – PPV for Transient Vibrations (<15 Hz)	Vibration Limit – PPV for Continuous Vibrations (<15 Hz)
Structurally sound and not protected	12.5 mm/s	6.25 mm/s
Protected and/or vulnerable structures	6 mm/s	3 mm/s

Source: British Standards Institution (BSI). 1993. *Evaluation and Measurement for Vibration in Buildings: A Guide to Damage Levels Arising from Ground-borne Vibration* (BS 7385-2). London: BSI.

7.5 Asbestos Management

34. Pakistan has still not banned asbestos generation and use in the country. Mining of asbestos has been done in various parts of Pakistan. Approximately 90% of these deposits of asbestos are in Khyber Pakhtunkhuwa (KPK) province (according to 2013 information).

35. In 2022 National Hazardous Waste Management Policy was adopted by the Ministry Of Climate Change Government of Pakistan. However, the document does not mention asbestos and its management.

36. In 2024, a draft version of the document "HAZARDOUS SUBSTANCES RULES" was prepared. In the mentioned document SCHEDULE I - List of Prescribed Hazardous Substances or Any Other Synthetically Chemical, asbestos has already been included as a hazardous substance (number 32). However, the law has not yet been adopted.

37. Pakistan is a party to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, the Stockholm Convention on Persistent Organic Pollutants (POPs) and the Minamata Convention on Mercury. Being a responsible state Pakistan must formulate the NHWM Policy to incorporate the relevant provisions of these Conventions to fulfill its international obligations.

38. The Stockholm and Minamata Conventions do not address asbestos waste. As for the Basel Convention, the convention does address asbestos as a hazardous waste, but the convention deals with transboundary movements and does not regulate the management of hazardous waste within the country.

39. Accordingly, as of today, the use and management of asbestos is not regulated in Pakistan, unless of course it is a project financed by international financial institutions. In summary, if asbestos is found, the contractor should develop an asbestos management plan in accordance with good international practices, such as those outlined by the ADB[10] and International Finance Corporation. Currently, the disposal, use, and management of asbestos are not regulated by Pakistan's legal framework.

7.6 Permits and Clearances to be Obtained Prior to Start of Construction

40. The Implementing Agency shall secure all required regulatory clearances, permits, and licenses prior to commencement of work. This includes building plan approvals, civil defense clearance, utilities approvals, and an environmental No Objection Certificate (NOC) or any other required mandatory permits/clearances by applicable laws.

41. The contractor will not be allowed to start site preparation and civil works until all required permits and clearances are obtained and a written copy is provided to IA.

8. ADB's Safeguard Policy Statement 2009

8.1 Environmental Screening and Categorization

42. The ADB SPS 2009 requires that environmental considerations be incorporated into ADB-funded projects to ensure that the project will have minimal environmental impacts and be environmentally sound. Occupational health and safety of the local population should also be addressed as well as the project workers as stated in SPS. A grievance redress mechanism (GRM) to receive application and facilitate resolution of affected peoples' concerns, complaints, and grievances about the project's environmental performance is also established.

43. The environment categorization depends on the significance of the potential environmental impacts. An RBL program's environment category is determined by the category of its most environmentally sensitive activity, including direct, indirect, induced, and cumulative impacts.

- **Category A.** A proposed RBL program is classified as category A if it is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works. Examples of category A activities may include transport infrastructure such as

[10] ADB. 2022. *Good Practice Guidance for the Management and Control of Asbestos: Protecting Workplaces and Communities from Asbestos Exposure Risks.*

highways and expressways; water resource infrastructure such as large dams; and energy infrastructure such as large power plants. As the safeguard categorization is based on the most sensitive activity in the program, and since category A activities are excluded from an RBL program, there will, by design, be no category A RBL programs in terms of environmental impacts.

- **Category B.** A proposed program is classified as category B if the potential adverse environmental impacts of the most sensitive activity in the RBL program are less adverse than those of category A programs. These impacts are site-specific, few (if any) of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A programs. A PSSA is required.
- **Category C.** A proposed RBL program is classified as category C if the program's activities are likely to have minimal or no adverse environmental impacts. No assessment of the program's environmental safeguard system is required.

8.2 ADB's Access to Information Policy 2018

44. ADB's new Access to Information Policy (AIP), reflects the ADB's ongoing commitment to transparency, accountability, and participation by stakeholders. The policy contains principles and exceptions to information sharing with external stakeholders, led by a new overarching principle of clear, timely, and appropriate disclosure.

8.3 ADB's Accountability Mechanism Policy 2012

45. The objectives of the Accountability Mechanism is providing an independent and effective forum for people adversely affected by ADB-assisted projects to voice their concerns and seek solutions to their problems, and to request compliance review of the alleged noncompliance by ADB with its operational policies and procedures that may have caused, or is likely to cause, them direct and material harm. The Accountability Mechanism is a last resort mechanism.

8.4 Implications of ADB's Safeguard Policies on Proposed Project

46. The objectives of ADB's safeguards are to:

a. avoid adverse impacts of projects on the environment and affected people, where possible;
b. minimize, mitigate, and/or compensate for adverse project impacts on the environment and affected people when avoidance is not possible; and
c. help borrowers/clients strengthen their safeguard systems.

47. The objective of the environmental safeguards is to ensure the environmental soundness and sustainability of projects and to support the integration of environmental considerations into the project decision-making process. The SPS sets out the 11 basic principles attached as Annex-II to be delivered in the area of environmental safeguards.

48. The distinct nature of RBL programs requires that they rely on the program systems to address social and environmental issues. Accordingly, the implementation of RBL programs will follow the same policy objectives and principles in the SPS, but not its policy delivery process and operational procedures. The RBL program uses the government's program fiduciary and safeguards systems.

9. Comparison of Requirements of ADB SPS 2009 with Pakistan Legislation on Environment

49. The comparison of national requirements with the ADB policy principles and the existing gaps along with the required actions by Implementing Agency (IA) to overcome these gaps is provided in Table 9 below.

Table 9: Comparison of National Regulations on Environment with ADB Policy Principles & Required Actions by IA-PIU

Policy Principles	National System requirements & Gaps with ADB SPS	Required Actions to address the gap by IA-PIU
Environmental Safeguards		
Principle 1: Use a screening process for each proposed project, as early as possible, to determine the appropriate extent and type of environmental assessment so that appropriate studies are undertaken commensurate with the significance of potential impacts and risks.	There is no significant gap between national/provincial legislation and ADB SPS requirements in using a screening process. All projects are screened and categorized according to the Punjab Environmental Protection Act (PEPA) 2012, Section 12 along with the Punjab Environmental Protection (Review of IEE/EIA) Regulations 2022, Schedule I and Schedule II and the Punjab Environmental Protection Act 2012 (Delegation of Powers for Environmental Approvals) Rules, 2017 as early as possible, to determine the appropriate extent and type of environmental assessment.	All subprojects will be screened and categorized by the Project Implementing Unit (PIU) to be established by the SHC&MED in accordance with ADB's safeguard requirements using rapid environmental assessment (REA) checklist (general) of ADB and the Punjab Environmental Protection Act (PEPA) 2012, Section 12 along with Punjab Environmental Protection Act 2012 (Delegation of Powers for Environmental Approvals) Rules, 2017, and Review of IEE/EIA Regulations 2022, Schedule I and Schedule II as early as possible, to determine the appropriate extent and type of environmental assessment and to ensure appropriate environmental category is assigned to the subproject. environmental category For Rawalpindi COE site where existing TB Center should be demolished, according to the SPS 2009 for projects involving facilities and/or business activities that already exist or are under construction, the borrower/client will undertake an environment audit, including on-site assessment, to identify past or present concerns related to impacts on the environment. For environmental safeguards, activities classified as category A under the Safeguard Policy Statement are ineligible for financing through RBL. The implementing agency (PIU) of the SHC&MED will screen all project activities as early as possible to

		exclude any activities that would be classified as environment category A under ADB SPS or that are listed on the ADB Prohibited Investment Activities List.
Principle 2: Conduct an environmental assessment for each proposed project to identify potential direct, indirect, cumulative, and induced impacts and risks to physical, biological, socioeconomic (including impacts on livelihood through environmental media, health and safety, vulnerable groups, and gender issues), and physical cultural resources in the context of the project's area of influence. Assess potential trans boundary and global impacts, including climate change. Use strategic environmental assessment where appropriate.	There is no significant gap between national/provincial legislation and ADB SPS requirements in conducting environmental assessment. The national environmental assessment requirements are less rigorous concerning climate change effects, strategic environmental assessment, and cumulative assessment. Projects with significant environmental impacts (Schedule II) will be excluded from the program. Projects with moderate impacts are expected to trigger the need to conduct environmental assessments and prepare national IEE. in accordance with the Punjab Environmental Protection Act 2012 (IEE/EIA Regulations 2022, Schedule I, Subsection I, where the preparation of IEE will be required for establishment of COE as well as obtaining of approval from Environmental Protection Agency (EPA Punjab).	PIU to be established by the SHC&MED IA will ensure the EARF document is used by the consultants engaged by PMIU for preparing the national IEE in accordance with the "Guidelines for the Preparation and Review of Environmental Reports", November 1997 (Government of Pakistan), Section 2.3 – Format of the IEE and obtaining approval from the Environmental Protection Agency (EPA Punjab). Use of EARF, Annex-IV - The National IEE Outline as a guideline by the IA-PIU consultants will ensure all gaps identified between the national regulations and the ADB SPS are overcome.
Principle 3: Examine alternatives to the project's location, design, technology, and components and their potential environmental and social impacts and document the rationale for selecting the particular alternative proposed. Also consider the no project alternative.	There is no gap between national/provincial legislation and ADB SPS requirements in examining alternatives. No additional action requiredis required. Examination of alternatives will be done according to the national "Guidelines for Preparation and Review of Environmental Reports", Government of Pakistan, 1997, Section 2.6 – Generating Alternatives, according which the alternatives will be examined to the project's location, design, technology, components, and their potential environmental and social impacts, and document the rationale for selecting the particular alternative proposed. Also, the "no-build" alternative shall be considered.	No additional action requiredis required. Examination of alternatives will be done according to the national "Guidelines for Preparation and Review of Environmental Reports", Government of Pakistan, 1997, Section 2.6 – Generating Alternatives.

Principle 4: Avoid, and where avoidance is not possible, minimize, mitigate, and/or offset adverse impacts and enhance positive impacts by means of environmental planning and management. Prepare an EMP that includes the proposed mitigation measures, environmental monitoring and reporting requirements, related institutional or organizational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators. Key considerations for EMP preparation include mitigation of potential adverse impacts to the level of no significant harm to third parties, and the polluter pays principle.	EMP as separate environmental instrument is not required according to the Punjab Environmental Protection (Review of Initial Environmental Examination and Environmental Impact assessment) Regulations 2022 and Guidelines for the Preparation and Review of the Environmental Reports, Government of Pakistan 1997. According to the national laws mentioned, a detailed EMP is not usually considered necessary for the IEE/EIA. The EMP should contain a comprehensive outline of the structure of the EMP with the summary of the environmental management and cleaner production principles which would be followed when undertaking the detailed design, construction and operation of the project. The EMP should provide framework for managing or mitigating environmental impacts for the life of the project. The EMP should consist of a schedule of the identified tasks, a time frame set for each activity, and responsibility for achievement of each task allocated. The EMP should be updated regularly.	EMPs for construction works should be prepared according to the ADB provided templatetemplate provided, and the related line items included in the works contracts. The EMPs will be expanded to site-specific EMPs (SSEMPs) based on the final design by the contractor before commencement of construction works. SSEMPs should be supervised and monitored during construction. Training sessions on EMP as an independent plan aligned with tender and contract processes should be conducted by TA consultant to meet ADB requirements.
Principle 5: Carry out meaningful consultation with affected people and facilitate their informed participation. Ensure women's participation in consultation. Involve stakeholders, including affected people and concerned nongovernment organizations, early in the project preparation process and ensure that their views and concerns are made known to and understood by decision makers and taken into account. Continue consultations with stakeholders throughout project implementation as necessary to address issues related to environmental assessment. Establish a GRM to receive and facilitate resolution of the affected people's concerns and grievances regarding the project's environmental performance.	Effective public consultation is mandatory in national IEE/EIA process according to the "Guidelines for the Preparation and Review of the Environmental Reports, Government of Pakistan 1997 and Punjab Environmental Protection (Review of Initial Environmental Examination and Environmental Impact assessment) Regulations 2022. No gaps regarding the meaningfulmeaningful consultations with this principle. On the contrary, there is a significant gap between the national legislation and ADB SPS requirements regarding the grievance redress mechanism (GRM). According to the national legislation, there is no convenient GRM except recourse of appeal to formal administrative jurisdiction or the court of law.	Affected parties will be consulted in a meaningful manner, in accordance with the requirements of national law (Punjab Environmental Protection (Review of Initial Environmental Examination and Environmental Impact assessment) Regulations 2022) and ADB SPS 2009, as part of the project design and implementation process. Consultation will be conducted throughout the design, construction, and operation phases, to address any environmental issues that may arise. SHC&MED PIU will establish easily accessible three-tier grievance redress mechanism available throughout project implementation that will be widely publicized within respective subproject area and amongst the affected persons. A two-tier program GRM will be established involving IDAP/PIU as 1st tier GRM (COE level GRC) in

		districts and SHC&MED/PIU as 2nd tier GRM.
Principle 6: Disclose a draft environmental assessment (including the EMP) in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. Disclose the final environmental assessment, and its updates if any, to affected people and other stakeholders.	There is no significant gap between national legislation and ADB SPS requirements with this principle. According to the Rule 12 (Decision) and 13 (Conditions of approval) of Punjab Environmental Protection Agency (Review of IEE/EIA) Regulations, 2012 the IEE will not usually require public advertisement and comment, but it remains publicly accessible document, available to any person who wishes to inspect it at the offices of the Responsible Authority.	The national draft and final IEEs/EMPs will be disclosed to affected persons, posted in the Executing Agency - SHC&MED and IA - PIU websites for public disclosure.
Principle 7: Implement the EMP and monitor its effectiveness. Document monitoring results, including the development and implementation of corrective actions, and disclose monitoring reports.	There is no gap related to implementing and monitoring of EMP. According to the national legislation (Guidelines for Review of IEE/EIA 1997) a management system for monitoring, reporting and responding to complaints should be established, with appropriate data storage, retrieval and access, and reporting intervals. Issues arising from the regular reporting should be reviewed, and preventative and remedial measures taken. The EMP should be updated regularly and independent audit undertaken. According to the Rule 19 (Monitoring) and 20 (Cancellation of approval) of Pakistan Environmental Protection Agency (Review of IEE/EIA) Regulations, 2022, there is a gap between national and ADB SPS requirements concerning the disclosure of monitoring reports, there is no specific requirement under the national law to disclose monitoring reports.	The SHC&MED IA-PIU will ensure subprojects monitoring programs include requirements and procedures for disclosure. Monitoring reports will be produced and posted on the Punjab Nursing and Health Workforce Reform Project RBL program EA/IA websites. Annual and/or Semiannual Environmental Monitoring Reports (SAEMR's) will also be posted on ADB website. IA will also ensure incorporation of EMPs into the bill of quantities in the bid documents and contracts.
Principle 8: Do not implement project activities in areas of critical habitats, unless (i) there are no measurable adverse impacts on the critical habitat that could impair its ability to function, (ii) there is no reduction in the population of any recognized endangered or critically endangered species, and (iii) any lesser impacts are mitigated. If a	There is a significant gap between national legislation and ADB SPS 2009 requirement concerning the critical habitats. According to the National Laws (e.g., NCS 1992, PEPA 1997), the NCS prioritizes biodiversity as one of its core areas but lacks specific implementation mechanisms. Pakistan	No activities shall be conducted in any areas with critical habitats and will be screened out since they will in all likelihood fall in category A, which are not permitted under the ADB RBL program. The site selection for civil works avoids development within protected areas (e.g., national parks, wildlife

project is located within a legally protected area, implement additional programs to promote and enhance the conservation aims of the protected area. In an area of natural habitats, there must be no significant conversion or degradation, unless (i) alternatives are not available, (ii) the overall benefits from the project substantially outweigh the environmental costs, and (iii) any conversion or degradation is appropriately mitigated. Use a precautionary approach to the use, development, and management of renewable natural resources.	Environmental Protection Act (PEPA) addresses environmental degradation but does not explicitly prioritize biodiversity conservation. Weak enforcement and limited focus on habitats critical to species conservation.	sanctuaries) in accordance with Pakistan's laws and regulations. While this significantly reduces the likelihood of encountering critical habitats, it does not eliminate the risk entirely, as critical habitats may also exist outside protected areas. A preliminary biodiversity screening using the Integrated Biodiversity Assessment Tool (IBAT) will be conducted for the candidate sites to ensure that no critical habitats are present in the proposed locations
Principle 9: Apply pollution prevention and control technologies and practices consistent with international good practices as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health and Safety Guidelines. Adopt cleaner production processes and good energy efficiency practices. Avoid pollution, or, when avoidance is not possible, minimize or control the intensity or load of pollutant emissions and discharges, including direct and indirect greenhouse gases emissions, waste generation, and release of hazardous materials from their production, transportation, handling, and storage. Avoid the use of hazardous materials subject to international bans or phase-outs. Purchase, use, and manage pesticides based on integrated pest management approaches and reduce reliance on synthetic chemical pesticides.	This is regulated by the section 11 of "Prohibition of certain discharges and subsequent Punjab Environmental Quality Standards", according which there is no significant gap between national, provincial and ADB SPS 2009 requirements. ADB requires the adaptation of the more stringent requirements between the international standard and government regulations.	IA will apply pollution prevention and control technologies and practices consistent with international good practice.
Principle 10: Provide workers with safe and healthy working conditions and prevent accidents, injuries, and disease. Establish preventive and emergency preparedness and response measures to avoid, and where avoidance is not possible, to minimize, adverse impacts and risks to the health and safety of local communities.	Occupational health and safety on work sites is regulated by the Punjab Occupational Safety and Health Act, 2019. No significant gap. There is no significant gap between national legislation and ADB SPS 2009 requirements concerning the occupational health and safety on work sites. OHS is regulated by the Punjab Occupational Safety and Health Act, 2019.	Contractor should consider site-specific hazards and prepare appropriate management plans to avoid, minimize or mitigate risks to workers and the public. The construction H&S requirements should be included in the EMP as well as in the bid documents and contracts.
Principle 11: Conserve physical cultural resources and avoid destroying or damaging them by	There is no significant gap between national legislation and ADB SPS 2009 requirements	Screening procedure will include provisions to exclude any project that will affect any cultural, historical,

using field-based surveys that employ qualified and experienced experts during environmental assessment. Provide for the use of "chance find" procedures that include a pre- approved management and conservation approach for materials that may be discovered during project implementation.	concerning the conservation of physical cultural resources. Conservation of physical cultural resources is regulated by the National Conservation Strategy Pakistan, 1992, Pakistan Antiquities Act 1975 & Punjab Antiquities Amendment Act 2012 along with NCS 1995. There is no significant gap between national and ADB SPS requirements. Not triggered. RBL program is unlikely to affect any cultural resources.	religious, regional and/or national heritage. A chance find procedure will also be made part of IEE study to guide the contractor on actions to be taken in case of finding a potential artifact.

ADB = Asian Development Bank, EARF= environmental assessment and resettlement framework, EIA = environmental impact assessment, EMP = environmental management plan, GRM = grievance redress mechanism, IA = implementing agency, RBL = results-based lending, REA = rapid environmental assessment, SPS = Safeguard Policy Statement.

50. The RBL program uses the government's fiduciary and safeguards systems. In case of gaps between the Laws of the Pakistan and the requirements of ADB SPS 2009, the principles and procedures of SPS 2009 will be applied. This priority of ADB standards over the state legislation is a requirement for projects/programs funded by ADB.

10. Managing Risks and Improving Environmental Management Capacity

10.1. General Principles for Environmental Management System of the Program

51. All selected COE sites listed for interventions under output 2 of the program will be subject to screening and assessment of potential environmental impacts and risks that could be likely from construction and establishment of climate-resilient infrastructure for three nursing centers of excellence (teaching space and hostels) in Punjab under the proposed RBL program. In order to minimize the program's environmental risk and ensure full compliance with Pakistan laws and regulations as well as ADB policy requirements for environment safeguards and RBL programs, the program will follow a set of principles in planning and implementing the subprojects. These principles include:

i) For the construction of climate-resilient infrastructure for three nursing centers of excellence (teaching space and hostels) in Punjab, those subprojects will need to screen the environmental risk using the Appendix 1 Rapid Environmental Assessment Checklist (REA, Appendix 1) to ensure unexpected impacts besides those common impacts associated with building construction can be identified. If there are any unexpected impacts except for those identified in Table 10 (Anticipated impacts and mitigation measures), additional assessments and mitigation measures should be conducted.
ii) Activities that classify as category A for environment under ADB's Safeguard Policy Statement (2009) are not eligible.
iii) The program will only support facilities with valid environmental impact assessment approved by relevant environmental protection authorities;
iv) Environment safeguard due diligence procedures and environmental management practices shall fully adhere to the national and provincial regulatory framework and gap-filling measures required to be in compliance with SPS.

v) The current environment management system will be strengthened and adjusted better fit to program's specificities. This will include preparation and implementation of the environmental management plan; organization meaningful public consultation throughout the project cycle; the assignment of qualified environmental safeguards specialist as staff of the IA-PIU for the Punjab Nursing and Health Workforce Reform Project; and the conducting of training for all key stakeholders on EMP implementation, supervision, monitoring and reporting.

C. ANTICIPATED ENVIRONMENTAL IMPACTS AND RISKS

52. Only the Output- 2 of the project will invest in the construction of physical infrastructure i.e. the new academic and hostel building blocks will be constructed for establishing the state-of-art COEs for nursing education at Multan, Lahore and Rawalpindi. A centralized design for establishing the COEs will be preferred however, based on the dimensions and area of available land parcels, site-specific adjustment in layout plans of academic and hostel building blocks can be adopted without compromising the COE infrastructure requirements. Acquisition of additional land through expropriation will be strictly avoided and to minimize the IR related impact, the construction activities will be limited within the SHC&MED owned land located in periphery of the exiting tertiary hospital or allocated government land or voluntarily donated individual owned/communal owned land parcels to SHC&MED in close vicinity of the tertiary health care hospital.

53. For preliminary screening and assessing the potential environmental impacts and risks candidate sites being considered for establishing the COEs were visited and Integrated Biodiversity Assessment Tool (IBAT) and Rapid Environmental Assessment (REA) Checklist were used for the assessment of the designated areas and other sensitive receptors around the project zone based on the coordinates of the project location. Key findings and potential environmental risks for each COE site are summarized below.

54. **COE site for Multan.** The site in Multan for construction of COE is located at existing complex of Nishtar 2 tertiary care hospital at Moza Laabr-O-Bulail Old Multan Shujabad Road. The site is near to the M4 Motorway Terminal in Multan and approximately 20 kilometers from Multan city center, making it accessible via Shujabad Road. The project site is a greenfield area located within the existing Nishtar 2 Building Complex. There are no underground utilities present at the site. According to Integrated Biodiversity Assessment Tool (IBAT) report results and Rapid Environmental Assessment (REA) Checklist used for the assessing of the designated areas and other sensitive receptors around the project zone based on the coordinates of the project location no protected areas as well as Key Biodiversity Areas (KBA) were found within 1 km, 5 km, 10 km, 20 km of the area of interest for proposed Multan COE site. No special area for protecting biodiversity, encroachments in historical areas, or physical cultural resources (PCR) were identified in close proximity to the project site. No national parks, wildlife sanctuaries or similar eco-sensitive areas were identified near the project site.

55. **COE site for Lahore.** The site selection process for the proposed Center of Excellence (COE) in Lahore is currently ongoing. The Specialized Healthcare & Medical Education Department (SHC&MED) has identified a government owned land parcel located along Pine Avenue in Valencia Town, Lahore, as a potential site. However, this location has not yet been confirmed.

56. It has been reported that the Government of Punjab is planning to develop a Medical City in Lahore to serve as a centralized hub for healthcare services, medical education, and research, addressing the growing healthcare demands of the region. As part of this broader initiative, the

establishment of the COE for Nursing is also being considered within the proposed Medical City. However, the final location and the specific land area to be allocated for the Medical City have yet to be confirmed within the LDA city which is a government land owned by the Lahore Development Authority.

57. For due diligence purposes, the site located along Pine Avenue in Valencia Town, Lahore, has been assessed as a potential location for the proposed Center of Excellence (COE). However, since the final location of the proposed Medical City has yet to be confirmed within the LDA city by the Lahore Development Authority, so the Specialized Healthcare & Medical Education Department (SHC&MED) is required to reassess the suitability of the Medical City site in light of this ongoing uncertainty.

58. Furthermore, a comprehensive site screening must be conducted in alignment with the guidelines and prescribed format set forth in the Program Safeguard System Assessment (PSSA). This is critical to ensure full compliance with the ADB SPS, 2009.

59. The project site in Lahore is a greenfield area located at Pine Avenue Road in front of Cancer Hospital Site, Block M. Valancia Lahore. The area of the site is approximately 4 acres. The site is accessible via Pine Avenue Road. According to Integrated Biodiversity Assessment Tool (IBAT) report results and Rapid Environmental Assessment (REA) Checklist used for the assessment of the designated areas and other sensitive receptors around the project zone based on the coordinates of the project location no protected areas as well as Key Biodiversity Areas (KBA) were found within 1 km, 5 km, 10 km, 20 km of the area of interest for proposed Lahore COE site. No special area for protecting biodiversity within close proximity of the project site. According to the field visit observations, no encroachments in historical areas, and no Physical Cultural Resources (PCR) have been identified in close proximity to the project site. Basic infrastructure, including sewerage and water supply systems, is available at the location. No underground utilities are present at the site. Additionally, there are no nationally significant cultural heritage sites within its immediate vicinity. No National Parks, wildlife sanctuaries or similar eco-sensitive areas were identified in the close proximity of project. Only in the 50 km zone there is one protected area - Changa Manga Forest.

60. **COE site for Rawalpindi.** Several alternative sites were being considered for the construction of the Rawalpindi COE until April 20, 2025 including i) Rawalpindi Medical University (RMU), ii) Rawalpindi Institute of Urology (RIU)/Punjab Kidney and Liver Institute –II (PKLI-II), and iii) Mother Child Hospital (MCH) Asghar Mall Road Rawalpindi. However, based on review of preliminary findings, SHC&MED after a joint site visit dated 20 April 2025, confirmed the MCH as ultimate site for establishing the COE for nursing education.

61. Mother and Child Hospital Rawalpindi is located on Asghar Mall Road in the heart of the Rawalpindi City. The MCH project was conceived in 2006 and its construction was started by the Federal Government on the government owned 12.5 acres' land parcel allocated for Tuberculosis Hospital established at site in 1936. For construction of MCH, the old building of TB hospital that was a 50-bed facility for indoor and outdoor patients was demolished and in addition to MCH building a single-story new building of Federal TB Center (exclusively out door patient facility) was constructed along the northern side boundary within the same precincts. Nonetheless, due to certain administrative issues between the elected federal and provincial governments the construction and operationalization of the MCH building was delayed, however, the TB Center has been operational in new building since 2014-15 for serving 300-350 patients daily.

62. Since the MCH with entire infrastructures is being placed under SHC&MED portfolio, so this site has been considered seriously for establishing the COE for nursing education. Additional Secretary (Development) and the ADB consultants mobilized for Technical Assistance and preparation of the RBL project visited this site on 20 April 2025. Multiple options including use of land available as car parking in front of TB hospital for construction of COE nursing as well as possible relocation of Federal TB Hospital to alternate location for clearing and use of land occupied by TB hospital were deliberated. Regardless the land occupied under TB center is required for COE, the SHC&MED is considering relocating it in any nearby government hospital under SHC&MED portfolio once its operations are transferred to SHC&MED of Punjab. However, initially the SHC&MED confirmed that the car parking space (almost 1 Acre) available in front of TB hospital will be utilized to the maximum extent for establishing COE nursing by constructing a multistory building. Meanwhile a separate approach road (~25 feet wide) between the boundary wall and the marked land for COE will be secured to provide interruption free access to TB center for its continued operation at site.

63. The COE site is a brown field area located at Asghar Mall Road Rawalpindi beside the Federal Government TB hospital. The site is accessible via Asghar Mall Road. There are no underground utilities present at the site. According to IBAT report results, no protected areas as well as Key Biodiversity Areas (KBA) were found within 1 km, 5 km, 10 km, 15 km of the area of interest for proposed Rawalpindi COE site. No special area for protecting biodiversity within close proximity of the project site. According to the field visit observations there are no encroachments in historical areas, and no Physical Cultural Resources (PCR) have been identified in close proximity to the project site. No National Parks, wildlife sanctuaries, wetlands or similar eco-sensitive areas were identified in the close proximity of project. However, several protected areas and KBAs are found within 20 km and 50 km of the area of interest according to IBAT tool including protected areas and KBAs in 20 km distance (Ayubia, Makhnial Khanpur, Margalla Hills National Park) and protected areas and KBAs in 50 km of the area of interest (Azad Pattan, Bagra, Chamnaka, Gari Phulgaran, Kala Chitta, Ayubia National Park and Kao valley, Dunga Gali, etc.).

64. **Potential Environmental Risks for all three COE sites in Multan, Lahore and Rawalpindi**. Since the demolishing of existing TB center is envisaged for Rawalpindi COE construction, therefore according to the SPS 2009 for projects involving facilities and/or business activities that already exist or are under construction, the borrower/client will undertake an environment audit, including on-site assessment, to identify past or present concerns related to impacts on the environment. The objective of the compliance audit is to determine whether actions were in accordance with ADB's safeguard principles and requirements for borrowers/clients and to identify and plan appropriate measures to address outstanding compliance issues. Where noncompliance is identified, a corrective action plan agreed on by ADB and the borrower/client will be prepared. The plan will define necessary remedial actions, the budget for such actions, and the time frame for resolution of noncompliance. The audit report (including corrective action plan, if any) will be made available to the public in accordance with the information disclosure requirements of the Safeguard Requirements 1–3.

65. Potential environmental impacts during the construction and operation phases of the program are primarily associated with: i) generation sewerage and solid waste and what is most important generation of construction waste during demolition of existing TB center for construction of Rawalpindi COE, potentially including material containing asbestos and medical waste. These impacts will be addressed through the implementation of mitigation measures. The Environmental Management Plan (EMP) will outline specific mitigation strategies to ensure effective waste management; ii) an increase in vehicular traffic is also anticipated during the construction and operational phases of the project, which could lead to a higher risk of accidents. To mitigate these

risks, an emergency response plan will be implemented for both phases to address and prevent such impacts; iii) an increase in traffic volume is anticipated which will likely lead to higher levels of air and noise pollution. These impacts will be mitigated through the implementation of specific measures outlined in the Environmental Management Plan (EMP), which will include strategies to address and manage air and noise pollution effectively; iv) OHS impacts are anticipated during the construction phase of the project. However, these impacts are expected to be site-specific, small-scale, temporary, and reversible if properly managed. The IEE and EMP will outline strategies to mitigate OHS risks and address community safety concerns effectively; v) generation of dust in sensitive areas during construction is anticipated to be generated during the construction phase of the project, however, the impact is expected to be site-specific, small-scale, temporary, and reversible; vi) excavated and spoil material will be generated during the construction phase of the project. The impacts associated with this will be mitigated through the implementation of appropriate mitigation measures. The EMP will include specific strategies to address the proper disposal of spoil material; vii) during civil foundation works and the erection of buildings noise and vibration are anticipated. These impacts are expected to be site-specific, small-scale, temporary, and reversible. They will be mitigated through appropriate measures outlined in the EMP/IEE; viii) risks to community safety from fire, electric shock, or failure of the building's safety features during operation are anticipated for the Center of Excellence building. However, an Environmental Management Plan (EMP) will be implemented to mitigate these impacts effectively through proper safety measures, regular maintenance, and training programs to ensure safe operation and minimize potential hazards; ix) community safety risks due to accidental and natural hazards are anticipated throughout all phases of the project. However, these risks will be addressed through the implementation of a comprehensive Environmental Management Plan (EMP), ensuring robust safety measures, community engagement, and compliance with safety standards. This will minimize risks and ensure the well-being of both the community and workers.

66. Further in-depth assessment will be required during detailed design of the COE buildings. The proposed works for the program is expected to be short-term, site-specific and limited to the construction phase of the program. The anticipated environmental impacts and mitigation measures related to the design, construction and operation phases of the proposed program are provided in **Table 10** below. The indicative impacts discussed below are insignificant and can be mitigated and therefore the program has been assigned the category B.

Table 10: Indicative Impacts and Mitigation Measures

Anticipated Environmental Impacts	Mitigation Measures
Design Phase	
Air quality	▪ Design of any insulated equipment will comply with international norms and standards for handling, storage, and management. ▪ Orientation of the building to maximize natural lighting and ventilation, installation of high-performance windows to regulate indoor temperatures thus lowering the energy demand. Lower energy demand leads to decreased combustion of fossil fuels in power plants, reducing emissions of pollutants such as sulfur dioxide (SO_2), nitrogen oxides (NO_x), and particulate matter, as well as GHGs like carbon dioxide (CO_2).
Sensitive Habitat and Designated Sites	▪ No activities shall be conducted in any areas with critical habitats (as defined by ADB SPS) and will be screened out since they will likely fall in category A, which are not permitted under the ADB RBL program. ▪ IA will apply ADB approach for protection of habitats and biodiversity in addition to national requirements.

Soils	Construction of CEO buildings: ▪ Identify presence of any unstable land and where COE buildings are not on flat land conduct geotechnical/slope stability analysis with slopes to be graded with drainage installed to minimize landslide risk. ▪ Ensure resulting slope design/topography does not exacerbate surface erosion and/or trigger a landslide. Soil contamination: ▪ The COE buildings construction areas will be surveyed during the design phase to assess the potential for contaminated land to be present in the area of the proposed installation and upgrading works. ▪ If signs of contamination are present in this area, soil sampling and testing shall be undertaken in the work area to determine the level of soil contamination.
Hydrology	▪ All wastewater from COE buildings to be connected to existing sewerage system or septic tank with soak away so no untreated wastewater will be disposed of to surface water or ground in operation, septic tank/soak away effluent to meet national general wastewater standards or IFC wastewater discharge limits, whatever is the most stringent.
Geohazards	Landslides, mudflows and earthquakes: ▪ Designing COE buildings using landslide / mudflow prevention design standards and considering earthquake loading as well as locating the facilities in stable areas, as far as possible would avoid landslides and impacts from seismic events.
Community Health and Safety	▪ The Project will respect all national safety protection zone regulations. ▪ Establishing a grievance redress mechanism (GRM) to address complaints promptly and effectively.
Occupational Health and Safety	▪ Occupational health and safety on work sites is regulated by the Punjab Occupational Safety and Health Act, 2019. ▪ Camp site building design will provide for sanitation and welfare facilities as per national regulations and international best practice including indoor toilets with hand washing facilities (one to six workers) and a dedicated cooking area / clean eating area / rest area for workers and staff on-site etc. ▪ Automatic fire alarms and fire suppression systems should be provided in camp site areas. ▪ As part of the screening activity, IA shall apply the ADB's Prohibited Investment Activities List (PIAL) and shall ensure the condition of permitting purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20% is satisfied by making it mandatory to: (i) assess the existing structures that need to be demolished/removed, to evaluate the risk of asbestos presence; and (ii) implement a screening of procurement procedures to ensure that asbestos-containing materials will not be used and/or financed by the Program.

Pre-Construction/Construction Phase:
Activity 1: Site preparation, surveying, soil testing, design, approvals, and material procurement
Activity 2: Foundation and Structural Works: Excavation, foundation, columns, beams, slabs, and roof construction
Activity 3: Masonry, Electrical works, and Plumbing: Wall construction, plastering, wiring, and plumbing systems
Activity 4: Finishing Work: Flooring, painting, ceiling, and installation of doors, windows, and fixtures

Category A activities being selected and significant impacts taking place	▪ Proper screening and categorization must be conducted to ensure that no category A activities are permitted since they are NOT eligible under the ADB RBL program.
Existing Facilities	▪ For Rawalpindi COE site, it is planned to demolish the existing TB Center. According to SPS 2009 for projects involving facilities and/or business activities that already exist or are under construction, the borrower/client will undertake an environment compliance audit, including on-site

	assessment, to identify past or present concerns related to impacts on the environment. The objective of the compliance audit is to determine whether actions were in accordance with ADB's safeguard principles and requirements for borrowers/clients and to identify and plan appropriate measures to address outstanding compliance issues. Where noncompliance is identified, a corrective action plan agreed on by ADB and the borrower/client will be prepared. The plan will define necessary remedial actions, the budget for such actions, and the time frame for resolution of noncompliance. The audit report (including corrective action plan, if any) will be made available to the public in accordance with the information disclosure requirements.
General Environmental Management	▪ The Construction Contractor will be responsible for preparing necessary Environmental Management Plans, such as: Pollution Prevention Plan, Traffic Management Plan, Occupational and Community Health and Safety Plan, Waste Management Plan, Labor Management Plan, Emergency Response Plan or any other plans that is required under IEE.
Agreements, Permits, Licenses, Authorizations, Certificates with No Objection, etc.	▪ Implementing Agency to ensure that all necessary permits and licenses for construction to be obtained and are provided prior to commencement of construction.
Submission of updated environmental management plan (EMP)/SSEM; EMP implementation and reporting	▪ The construction contractor will appoint Environmental, Health and Safety (EHS) Supervisor to ensure EMP implementation ▪ Submission of updated EMP/SSEMP ▪ Timely submission of monthly/quarterly/semiannual monitoring reports, including documentary evidence of the implementation of the EMP, such as photographs
Air quality	<u>Dust Control</u>: ▪ Dust control measures will be implemented on all roads used by the vehicles under the project within 250m of residential / sensitive receptors. ▪ Ensure an adequate supply of bowsers and carry out watering for dust control at least once a day near residential areas: in dry weather with temperatures of over 25°C, or in windy weather. Avoid overwatering as this may make the surrounding muddy. ▪ Vehicle movements will be restricted to defined access routes and demarcated working areas (unless in the event of an emergency). ▪ A strict Project speed limit of 30km/hr will be enforced for Project vehicles using unmade tracks. ▪ Excavated materials will be stockpiled where practical away from sensitive receptors, such as homes, schools, and health facilities. Where this is not possible, ensure regular watering of stockpiles to prevent dust impacts. ▪ Earthwork operation will be suspended when the wind speed exceeds 20 km/h in areas within 500 m of any community. ▪ Vehicles carrying fine aggregate materials will be sheeted to help prevent dust blow and spillages. ▪ Only use cutting, grinding, or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g., suitable local exhaust ventilation systems. ▪ Provide workers with N95 dust masks to wear when ambient conditions are dusty or when dust generating activities take place. <u>Siting of Equipment:</u> ▪ Stationary emission sources (e.g., portable diesel generators, compressors, etc.) shall be positioned as far as is practical from sensitive receptors. Most construction activities will be conducted after school hours. <u>Release of Exhaust Gases and Fugitive Emissions:</u> ▪ Emission sources (vehicles such as excavators) shall be positioned as far as is practical from sensitive receptors

	▪ Equipment and vehicles will be regularly maintained in accordance with the manufacturer's recommendations to maximize fuel efficiency and help minimize emissions. ▪ Construction equipment and vehicles will meet the Punjab Environmental Quality Standards (PEQS) for emissions. Belching of black smoke is prohibited. ▪ Limit engine idling to a maximum of 5 minutes. ▪ Controlled or uncontrolled burning of waste will not be allowed. ▪ Avoid the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable ▪ Dust generating surfaces shall be kept dampened and covered against direct sunlight and wind to minimize the emission of dust, spray stockpiles. ▪ Dust screens will be utilized if in close proximity to functional areas within school or residential areas. ▪ Sprinkling of water will avoid dust pollution.
Hydrology	<u>Water Quality:</u> ▪ Concrete batching (if required) will be sited at least 50m away from sensitive receptors such as watercourses; wash pits to be lined with an impermeable liner. ▪ Treated wastewater will be used for damping down road surfaces to mitigate dust generation. ▪ Domestic sewage from camps will be stored and transported to water treatment works or treated through a dedicated site sewage water treatment plant before discharge to ground or surface water. ▪ All wastewater discharges will follow the PEQS or WHO standards which ever more stringent. ▪ Construction camps will be located at least 200m from water courses. ▪ All mobile plant will be kept at least 10m distant from surface water and any groundwater wells. ▪ Drip trays will be placed below all mobile generators ▪ Potable water will be supplied that meets national drinking water standards and ISO 10500 drinking water parameters (full suite). If this is unavailable, ensure a regular supply of bottled water to the site during construction and operational phases. Water use: ▪ The prior agreement of local communities to use their local piped water either temporarily during construction or permanently for substations will need to be obtained. ▪ No groundwater will be used in districts without additional groundwater capacity – in other districts groundwater will not be used without the agreement of local communities.
Soils and Geology	<u>Erosion:</u> ▪ Construction activities should avoid steep slopes and any landslide prone areas. ▪ The foundation for the COE buildings, transformer pads, cable trenches, rails, and other equipment will be constructed in accordance with the approved detailed design. ▪ Upon completion of subsoil and topsoil reinstatement, the Contractor will inspect disturbed areas jointly for signs of erosion, slope stability, relief, topographic diversity, acceptable surface water drainage capacity and function, and compaction and implement remedial measures, if necessary. ▪ Schedule works during the dry season, where practical, to minimize any exposed areas subject to erosion by surface water runoff. ▪ Rehabilitate any disturbed areas beyond the footprint of the alignment to at least original condition through revegetation using native species. <u>Top soil:</u> ▪ On completion of works, stockpiled topsoil will be spread over the surface of disturbed work areas ▪ Revegetation of the soils will follow using native seed mixes

	▪ Stored subsoil and topsoil will be segregated in a manner that avoids mixing. ▪ Topsoil will be stored outside the running track used by construction plants, equipment and vehicles. Soil storage areas will be protected from vehicle movements to avoid soil compaction. <u>Soil contamination:</u> ▪ The storage of hazardous materials will be restricted to designated impermeable hazardous materials storage areas located at least 50m from any surface water course or seasonal water channel. ▪ A refueling procedure will be developed, which will include a restriction on refueling within 50m of any watercourse. ▪ All material safety data sheets (MSDS) are kept on-site with the relevant materials. ▪ Materials that can potentially react with each other will be segregated during storage. ▪ Hazardous chemicals will be securely stored on-site in a designated storage area and relevant personnel will be trained in safe use and handling of hazardous materials. ▪ Diesel storage tanks at construction camps will be located in suitably sized and constructed areas that are designed to be impervious to water and fuel. The bund volume will be designed to be no less than 110% of the tank volume. Loading and off-loading connections will be located over secondary containment. ▪ Spill response equipment (absorbents etc.) will be available in hazardous materials storage areas. ▪ Watering of excavated areas shall be performed daily during works to limit exposure to windblown dust.
Biodiversity	<u>General:</u> ▪ Camp sites shall be selected to avoid the cutting of mature vegetation. ▪ Vehicle movements will be restricted to defined access routes and demarcated working areas (unless in the event of an emergency) to reduce unnecessary impacts to habitat. ▪ Pre-construction surveys will be undertaken along the route and at camp locations to identify any need for site or species-specific mitigation measures. ▪ Compensation planting will be undertaken to offset the essential removal of any trees. ▪ An inventory will be made of all trees felled during the Project construction phase, in accordance with the requirements of national legislation. Any Red Book species will be identified and protected via fencing or bunting throughout the construction phase in the specific location of works. ▪ Temporary works areas will be reinstated to near original condition (as compared to pre-construction survey reports or adjacent areas). ▪ Reinstatement will be undertaken as early as practicable and in accordance with the Reinstatement Implementation Plan. ▪ Any areas that have a high erosion risk will be reseeded using an appropriate seed mix. ▪ If trees are removed, compensation planting will be undertaken based on the number of trees to be removed and using an appropriate re-planting ratio (species and region specific). <u>Sensitive Habitat and Designated Sites:</u> ▪ Conduct screening of project influence area to identify protected areas/sites and conservation status of species ▪ Utilize tools like Integrated Biodiversity Assessment Tool (IBAT) and data from government sources, and international agencies like World Database of Key Biodiversity Areas website (WPDA), Important Bird Areas (Birdlife International); Ramsar website; IUCN Red list; etc. ▪ Engage biodiversity experts to conduct assessments and develop mitigation measures

- Engage a local biodiversity expert to verify findings on-site
- Conduct field-level site visits for the review and updating of the EMP
- If species of interest are found on-site, ensure that the findings are recorded and reported to the IA/PIU. No disturbances or works on the site should start/continue until IA/PIU issues clearance to proceed. Measures to restrict poaching or hunting shall be put in place.
- If species of interest are present, if possible, an alternative site should be considered. If no alternate site is available, PIU shall coordinate with the forest and wildlife department for the translocation of the animals.
- Construction camps shall not be located: within 100m of any irrigation channel; within 250m of any natural surface water course; within any of the identified areas of natural habitat or any other sensitive habitat identified by the Contractors.

Waste Management & Hazardous Materials

General:

- Construction sites, material storage yards, and access roads will be kept in an orderly condition throughout the construction period.
- Refuse and trash will be removed from the sites and disposed of in an approved manner (e.g., in an approved landfill).
- In remote areas, trash and refuse could be removed to a construction staging area and contained temporarily until such time as it could be hauled to an approved site.
- No open burning of construction trash will be permitted.
- Contaminants such as oils, hydraulic fluids, antifreeze and fuels will not be dumped on the ground, and all spills will be cleaned up.
- Ensure that the waste hierarchy is followed including prevention, minimization, reuse and recycling.
- Provide regular training for staff in waste management issues.

Liquid Waste:

- Provide septic tanks for camp sites servicing less than 150 employees.

Domestic and Inert Waste:

- Collect domestic waste in containers fitted with lids to avoid the attraction of scavengers, scattering around.
- Remove domestic waste through an EPA certified company to the nearest landfill site.
- Provide garbage bins and facilities within the project site for temporary storage of domestic solid waste and construction waste.
- Ensure that waste is not haphazardly dumped within the project site and adjacent areas.

Hazardous waste:

- Prohibit the use of damaged containers. Check integritythe integrity of containers – regularly.
- Mark containers adequately specifying waste types.
- Provide secondary containment for hazardous waste liquids.
- Hire EPA certified contractor for safe disposal of hazardous waste.

Asbestos:

- In case is necessary to demolish old existing structures in Rawalpindi, IA-PIU to conduct robust assessment of asbestos by a qualified firm/expert to be required **prior to finalization of the design** to determine the type, quantity, requirements in removal, handling, storage, and disposal, and costs.
- In bidding documents and contracts, Contractor's qualification to **include** asbestos handling, storage, and disposal. Only qualified contractor staff should prepare the Asbestos Management Plan.
- In bidding documents and contracts, include the disposal of all asbestos wastes. If contractors engage or subcontracted to 3rd party, the IA should conduct due diligence on the capacity of the 3rd party to meet ADB

	SPS requirements on OHS, handling and disposal. IA-PIU to confirm to ADB that the disposal site is suitable for asbestos waste. ▪ Removal and disposal of asbestos will be in accordance with the defined requirements of best international practice (IFC, ADB) indicated in the asbestos management plan. ▪ No ACM to be used for the construction of COE. As part of the screening activity, IA shall apply the ADB's Prohibited Investment Activities List (PIAL) and shall ensure the condition of permitting purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20% is satisfied by making it mandatory to: (i) assess the existing structures that need to be demolished/removed, to evaluate the risk of asbestos presence; and (ii) implement a screening of procurement procedures to ensure that asbestos-containing materials will not be used and/or financed by the Program. ▪ IA to conduct an awareness program on safety during the construction work. ▪ Maintain records of ACM containing structures as per the AMP.
Noise and Vibration	<u>Siting:</u> ▪ Camp sites shall not be located close to residential areas or other sensitive receptors. <u>General:</u> ▪ Equipment and vehicles will be regularly maintained in accordance with the manufacturer's recommendations to help minimize noise emissions. ▪ During construction, work will be undertaken in daytime hours only – in accordance with World Bank Group requirements. ▪ Noise generating construction related activities will be avoided during evenings, school hours, prayer times, religious or cultural events near the sensitive receptors. ▪ Construction noise in the vicinity of houses must be limited to project standards as defined in the subproject national IEE. ▪ If these noise levels are exceeded, the contractor will be required to implement additional noise mitigation measures such as adjusting his working methods or placing of temporary noise barriers to ensure the noise standard is met. ▪ Residents will be forewarned of planned activities that are considered by the Project to be noisy (e.g., excavation / drilling). ▪ If complaints are received from the local population regarding elevated noise levels, temporary noise screens shall be installed around the work site, shielding the identified receptors from the source of noise. ▪ Construction workers' exposure to noise should not exceed the levels set out in the General EHS Guidelines on Occupational Health and Safety otherwise hearing protection is to be provided. ▪ Construction Contractor to avoid soil compaction, piling, blasting and other vibration inducing activities as much as possible; in locations where this is unavoidable Contractor to identify properties within the zone of influence and undertake pre-construction structural surveys to identify level of risk. ▪ Schedule noisy or otherwise invasive activities during periods of the day which will result in least disturbance ▪ Schedule noisy or otherwise invasive activities during periods of the day which will result in least disturbance ▪ Identify any buildings at risk from vibration damage and avoid any use of pneumatic drills or heavy vehicles in the vicinity. Complete work in these areas quickly.
Utilities and Infrastructure	<u>Access:</u> ▪ A record will be made of the condition of access roads, construction camps and laydown areas before construction to inform the reinstatement works. ▪ Existing paved and unpaved roads will be used for the initial transportation of materials and equipment from the staging and storage areas to locations where construction activities are implemented. ▪ If any new access roads are required, the construction contractor shall do what is necessary to make access suitable for his use.

	▪ Provide information to the public about the scope and schedule of construction activities and expected disruptions and access restrictions at least 72 hours before the disruptions. ▪ If temporary access roads are to be constructed with a gravel surface, they will be routinely watered during dry weather to reduce dust impacts. ▪ Provide adequate traffic signs, appropriate lighting, well designed traffic safety signs, barriers and flag persons for traffic control. <u>Utilities:</u> ▪ Identify and include the locations and operators of these utilities in the detailed design documents to prevent unnecessary disruption of services during the construction phase; ▪ Require construction contractors to prepare a contingency plan to include actions to be taken in case of unintentional interruption of services. ▪ All electricity and gas supply networks in the subproject area will be kept operational, particularly during the winter months.
Physical Cultural Heritage	▪ The Contractor will prepare a chance find procedure. The procedure will incorporate all the requirements of the GoP regarding chance finds. ▪ In the case of a chance find, the contractor will secure the site and report immediately to Supervision Consultant and IA-PIU. ▪ The following 'chance find' principles will be implemented by the contractor throughout the construction works to account for any undiscovered items identified during construction works at all school sites: ▪ in case some heritage found during the construction, the workers will be trained in the location of heritage zones within the construction areas and in the identification of potential items of heritage significance. ▪ Should any potential items be located, the site supervisor will be immediately contacted and work will be temporarily stopped in that area. ▪ If the site supervisor determines that the item is of potential significance, an officer from the Department of Archaeology (DoA) will be invited to inspect the site and work will be stopped until DoA has responded to this invitation. ▪ Work will not re-commence in this location until an agreement has been reached between DoA and proponent as to any required mitigation measures, which may include excavation and recovery of the item ▪ A precautionary approach will be adopted in the application of these procedures.
Workers' Rights and OHS	<u>Safety and Training:</u> ▪ All workmen will be required to attend a safety induction course before they are allowed access to the work site. ▪ Periodic safety courses will be conducted not less than once every two months. ▪ Regularly inspect, test and maintain all safety equipment (including fire-fighting equipment), scaffolds, guardrails working platforms, hoists, ladders and other means of access, lifting, lighting, signing and guarding equipment. ▪ Workers will be provided (before they commence works) with appropriate PPE suitable for electrical work such as safety boots, harnesses, helmets, gloves, protective clothes, goggles, and ear protection at no cost to the workers. <u>General OHS:</u> ▪ All contractors shall develop health and safety plans to ensure the health and safety of workers and the community. ▪ All construction plants and equipment used on or around the site will be fitted with appropriate safety devices. ▪ Zones with noise levels above 80 dBA must be marked with safety signs and appropriate PPE must be worn by workers. ▪ Portable toilet facilities for workers at road work sites will be provided. ▪ Fencing on all areas of excavation greater than 2 m deep will be installed along with warning signs. ▪ Mark the areas where risk of injuries from falling objects exist with rope or flagging to minimize risks and injuries.

- Provide spotters. Employ flag persons/flag mam to control traffic when construction equipment is entering or leaving the work area.
- Safety measures within buildings against fire, electrocution, lightning, and other potential hazard events shall be implemented. Safety regulations shall be followed by contractors to minimize risks.
- Safety nets should be used to cover buildings and prevent injury to students and teachers.
- First aid kits (compliant with OSHA standard 1910.266 App. A) will be provided at all work sites.
- The Contractor shall keep a log of both training records and safety incidents, including near misses.
- Only allow trained and certified workers to install, maintain, or repair electrical equipment.
- The workers are properly insulated during electrical works with gloves or other approved insulation.

Workers' Rights:

- All workers will have contracts describing their job description and conditions of work and will have the contents explained to them.

Training:

- Ensure topics covered by training and induction include, but are not limited to, good housekeeping at all times; environmentally safe and sound waste management practices; hygiene and communicable disease prevention including COVID-19 and HIV/AIDS; gender-based violence and sexual exploitation, abuse and harassment prevention; code of conduct, interaction with local communities and culturally acceptable practices; biodiversity conservation awareness; fire safety prevention; prohibition on trapping, hunting, fishing, or poaching by workers; chance find procedures; H&S including use of PPE; etc.
- Prepare with guidance of labor experts a worker Code of Conduct and information video/brochure/leaflet for distribution to all workers during induction addressing culturally acceptable practices etc.
- Zero tolerance of illegal and unacceptable activities/behavior, including but not limited to engagement in: prostitution; gender-based violence/sexual exploitation, abuse, and harassment; illegal sale or purchase of alcohol; sale, purchase, or consumption of drugs; gambling; Figurehting.
- Conduct daily toolbox talks on pertinent topics related to the day's work and weekly training on occupational health and safety for all construction workers including refreshers. To include training for subcontractors before commencement of works.
- Only allow suitably trained and qualified workers to work on electrical equipment and at height, these workers must have training record of attending suitable training course on electrical safety and working at height and be provided with and wear the appropriate PPE for their role.
- Conduct daily toolbox talks on pertinent topics related to the day's work and weekly training on occupational health and safety for all construction workers including refreshers. To include training for subcontractors before commencement of works.

Grievances:

- The Construction Contractor shall establish a formal Grievance Mechanism for workers and carry out awareness raising amongst formally and informally employed workers including those of subcontractors about the GRM at the start of their employment, including details of how to submit a grievance to IA-PIU and/or the Contractor. GRM will be available to all workers for receiving and handling complaints about unfair treatment or unsafe living or working conditions, ensuring no coercion nor reprisal.

Community Health and Safety

General:

- Implement the Grievance Procedure to provide opportunities for local residents to raise concerns.

	▪ Ensure that all Project infrastructure is constructed in accordance with national safety codes. Hazardous Work Sites: ▪ Fence and sign immediate working area to prevent public access during construction works. ▪ Do not leave hazardous conditions (e.g., unlit open excavations without means of escape) overnight unless no access by public can be ensured. ▪ All Project infrastructure will be labeled / signposted in accordance with national regulations to inform the public of the specific safety risks of each item. ▪ All work sites will be appropriately signposted and isolated (through fencing or bunting) to prevent encroachment into these areas. Community Liaison: ▪ Consult with local communities every six months, informing them on the status of implementation and results. ▪ Deliver safety awareness training to, local children and their parents and/or their teachers. ▪ Construction traffic warning signs will be positioned at road crossings and other appropriate locations as determined by the subproject, for example along access routes before they are used by construction traffic. Traffic Accidents: ▪ A strict subproject speed limit of 30km/hr will be enforced for vehicles using unmade tracks. ▪ Temporary traffic control measures will be employed at road crossings and junctions (flagmen, temporary traffic lights) where a safety risk assessment has identified traffic control measures will reduce the risk of traffic accidents. ▪ At sensitive locations where traffic will be using local roads, and particularly where schools and markets are close to the road, awareness of safety issues will be raised through village meetings and classroom lessons. ▪ Temporary traffic control (e.g. flagmen) and signs will be provided where necessary to improve safety and provide directions. ▪ Where traffic is diverted around crossings, traffic control or careful selection of the exit from the working areas will be provided with the aim of ensuring vehicles join the road in a safe manner. ▪ Vehicle movements will be restricted to defined access routes and demarcated working areas. Sexually Transmitted Disease: ▪ A worker education and awareness program regarding the risks and prevention measures associated with STDs including HIV/AIDS and other communicable diseases will be implemented. ▪ The Project will make information on communicable diseases and STDs available to communities' close to the camps.
Operation Phase	
Wastewater - Inadequate wastewater disposal	▪ Ensure connection of new buildings to on-site pre-treatment facilities (septic tanks) and/or to municipal sewer system. ▪ Periodically monitor (visual inspection) sludge accumulation in septic tanks, and request an EPA certified company to de-sludge as needed.

Solid waste - Inappropriate management of non-hazardous solid waste	▪ Provide adequate solid waste collection facilities in all buildings; ▪ Promote segregation of waste through (i) provision of separate collection bins for paper, biodegradable waste, metallic waste, and other wastes; and (ii) provision of training and awareness raising for students and teachers; ▪ Reach agreement with waste collection service providers for different types of waste. ▪ Regularly clean and disinfect waste collection facilities.
Health and Safety - Multipurpose STEM laboratories in selected elementary schools' health and safety	▪ Ensure compliance with relevant health and safety regulations pertaining to ventilation, indoor air quality, lighting, noise, fire escape, etc.; ▪ Establish a COVID-19 prevention plan and emergency response plan and disclose at entrance of the facility; ▪ Establish preparedness plan and operation plan under emergency conditions, such as fire, flood, earthquake, wind, storm, water contamination, epidemic, air contamination, infestation, explosion etc. to ensure safe environment for all elderly people, staff and visitors; ▪ Provide training on infection control policies and procedures to teachers. ▪ Set up an isolation room with protective equipment (protective clothing, medical masks, gloves, etc.) in a relatively independent, well-ventilated single room.

Source:

D. ENVIRONMENTAL ASSESSMENT FOR SUBPROJECTS AND/OR COMPONENTS

1. Screening and Categorization of the Subproject

67. The Punjab Nursing and Health Workforce Reform Project has been classified as category B for environment. Every subproject to be included in the RBL program will be screened to confirm its environment category based on-site selection criteria presented in **Annex 4** to ensure that any activities, which could fall under category A as per ADB SPS 2009 are excluded from the RBL Program.

68. IA-PIU Safeguards staff will apply the criterion provided in Annex 3 during the subprojects' site selection process for overall The Punjab Nursing and Health Workforce Reform Project. This Criterion will be used to complement the ADB REA and IR/IP Checklists to screen and categorize program activities and is intended to focus on the 'critical safeguards triggers' during the site selection process.

69. As soon as sufficient information on the subprojects is available, screening is to be conducted using the ADB's REA checklists presented in **Annex 1** to determine the subproject environmental category. Requirements as per the government regulations (clearances, approvals, consent etc.) shall also be identified at this stage, including the statutory clearance requirements.

70. An environmental checklist has been proposed based on the most sensitive component. This means that if one of the screening questions is positive (Yes) the subproject should not be included in the RBL Program. The purpose of the screening is to ensure that the projects will be environmentally sound and none will be located within or close to an environmentally sensitive areas such as a wildlife sanctuary, national park, or other areas with significant ecological functions that are declared as national parks, or national/international cultural heritage. Any construction activities that may cause significant and irreversible adverse environmental impacts shall be excluded from the RBL Program.

71. In addition to the REA checklist, the following questionnaire in Table 11 will be used. IA-PIU team will include relevant technical experts on environment, health and safety (EHS) biodiversity, heritage impact assessment, and asbestos management expert (if there are ACMs to be identified) to conduct the respective requirements detailed in Table 11.

Table 11: Specific Issues or Concerns for Succeeding Subprojects

Issues and Concerns	Required Actions
Is the subproject screened using the project exclusion criteria?	• Refer to EARF's screening checklists in Annex 1.
Has the subproject included environmental considerations in the location and design parameters?	• Refer to EARF's Annex 3: Environmental Guidelines for Subproject Selection
Is the subproject site within likely critical habitat?	• Conduct IBAT preliminary screening • Subprojects within the likely critical habitats will be excluded from the RBL Program.
Are there physical cultural resources in the within or near the subproject sites?	• Subprojects located within or near the physical cultural resources will be excluded from the RBL Program
Are there existing ACM in any of the components?	• Conduct inventory of ACM in the subproject site • If ACM is to be removed, follow Asbestos Management Plan and implement mitigation measures • If ACM is to be left in-situ, ensure documentation and recording as laid out in Asbestos Management Plan • ARIS to report to ADB the extent of ACM for removal and left in-situ.

2. Preparation of Environmental Assessments and Environmental Management Plans

72. All the subprojects under the RBL Program shall undergo the procedure of environmental assessment to mainstream environmental concerns into RBL Program implementation.

73. According to the national and provincial legislation of Pakistan, subprojects require preparation of the national IEE report for submission to the Environmental Protection Agency (EPA Punjab) for obtaining approval.

74. The national IEE shall be prepared by IA-PIU and shall be submitted to EPA Punjab for approval. The approved IEE along with EMP and together with the environmental expertise positive conclusion, shall be included in the bid and contract documents and shall be provided to the tender winner construction company.

75. The National IEE shall be prepared in alignment with the 1997 Guidelines for the Preparation and Review of Environmental Reports issued by the Government of Pakistan (GoP). These guidelines serve as the foundational framework to ensure compliance with environmental standards and regulatory requirements. The national IEE outline is presented in the **Appendix 3** of the present EARF. Its level of detail and comprehensiveness is commensurate with the significance of potential environmental impacts and risks.

76. Since, according to the national law a detailed EMP is not usually considered necessary for the IEE/EIA, therefore EMPs for construction works should be prepared according to the ADB provided template. The EMP should contain the measures to mitigate and prevent unwanted effects that may arise during the subproject implementation, as well as the monitoring actions to check compliance of construction works implementation process to the planned mitigation measures through the whole project cycle: from the engineering design phase, pre-construction, construction through the operation and maintenance periods. The mitigation measures to control

the identified impacts and risks shall be planned for every subproject based on the EMP to be prepared along with IEE.

77. The EMP shall be incorporated into the bill of quantities and as an obligatory integral part shall be attached to the tendering and contract documents of the contractor along with IEE package. The construction contractor shall be responsible for EMP implementation and shall include relevant clauses in the contracts with any sub-contractor.

E. CONSULTATION, INFORMATION DISCLOSURE AND GRIEVANCE REDRESS MECHANISM

1. Public Consultation and Information Disclosure

78. Consultations, participation and information disclosure will be an integral part of environmental safeguards impacts screening and assessment, planning, design and preparation of required environmental safeguards documents including IEEs at project design stage as well as during IEE implementation and environmental safeguards management and monitoring throughout project execution. The EA/IA will devise and implement a comprehensive consultation, participation and information disclosure (CPID) strategy to ensure the stakeholders who are directly or indirectly involved in the project including: (i) residents and community in project school vicinity; (ii) students, parents and teachers; (iii) affected persons, marginalized/vulnerable beneficiary groups; and other government officials and civil society in project districts. CPID will be an ongoing process that will begin at the subproject preparation stage and it will be carried out on an ongoing basis throughout the subproject cycle for timely disclosure of relevant information and enabling the project executors to document and address the concerns of stakeholders including APs. It will also help project implementers to consider and incorporate relevant views of affected persons and other stakeholders into decision-making.

79. **Public Consultations.** As part of CPID, meaningful consultations will be carried out with all key stakeholders during project design, conducting environmental due diligence and preparation and implementation of national IEEs of the subproject. The consultation results will be documented and incorporated in project design and considered for implementation of national IEEs.

80. It is recommended that public consultation be carried out during the early stages of the program commencement and throughout the program implementation to address any environmental issues that affect the local communities. It is important that consultation with stakeholders occurs at an early stage of program preparation and implementation. The main principles of public consultations to be conducted according to the ADB SPS 2009 requirements are:

- begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle;
- provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people;
- is undertaken in an atmosphere free of intimidation or coercion;
- is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and
- enables the incorporation of all relevant concerns of affected people and other stakeholders into decision-making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

81. The safeguards staff of the EA/IA with the assistance of the safeguards and technical staff of IDAP will retain a close liaison with the local community, APs and other key stakeholders for each COE. The project-based GRM with grievance handling mechanism will be explained to the local communities, affected persons and other relevant stakeholders. Information related to processing of claims, project works implementation timelines will be provided repeatedly. The camp office and the deployed supervision staff of the implementing partner will be used as a local level consultation forum at each COE site whereas the PIU in IA will be the program level forum for consultations and information disclosure. The whole consultation process including comments on the design, national EIAs and EMP (i.e. program schedule, project information handouts, attendance sheet, complaints, issues and concerns raised by participants) shall be recorded and addressed accordingly. Another public consultation shall be held upon the need should the design or another significant change in project/program implementation occur.

82. **Information disclosure.** The EARF as supplementary document of the PSSA for the program will be disclosed on ADB and EA/IA websites before appraisal of the project. The national IEEs to be prepared for any of the selected COE site, once the detailed designs have been finalized will also be disclosed on the websites of ADB and EA/IA and by placing hard copies at accessible locations including the office of the PIU in IA and the camp office of the PIU/ General Manager (healthcare projects), IDAP in Multan, Lahore and Rawalpindi at the COE level. The summary of the IEEs detailing information about subproject description and environmental impacts, legal framework, mitigation measures, GRM, institutional arrangement, and implementation time frame will be translated into local language and will be disclosed to the APs and local communities.

2. Grievance Redress Mechanism

2.1 Introduction of GRM

83. SHC&MED has established a web-based complaints filing and resolution system. An online portal for complaints and suggestions is published for the users and operators of the health and medical education facilities to register and respond to concerns and complaints of the beneficiaries and service users. The complaints received and recorded through the online complaint portal are assessed and inquired through the concerned authorities of the SHC&MED and findings including recommendations of the investigations are implemented and communicated to the complainants. Nonetheless, said system is available and functioning with wider scope which can be used for raising issues and filing complaints related to the PN&HWR – RBL program, however it is comprehended that a RBL program specific GRM will have to be established and operationalized for registering, reviewing and redressing the RBL program related issues and complaints.

84. Keeping in view the noted requirement, a program specific GRM has to be institutionalized for recording, reviewing and addressing program related grievances and concerns about social and environmental safeguard issues regarding involuntary resettlement planning, environmental management and work place security and safety etc. that may emanate during planning, design and execution of the program works. This EARF outlines the structure, roles and functions of the GRM with a particular focus on the functions of the GRM regarding environmental safeguards-related issues.

85. Meaningful consultation and information disclosure is key to engage the stakeholders that may help to minimize the complaints and grievances, So, efforts will be exhausted to avoid grievances through strong consultations participation and information disclosure strategy (CPID)

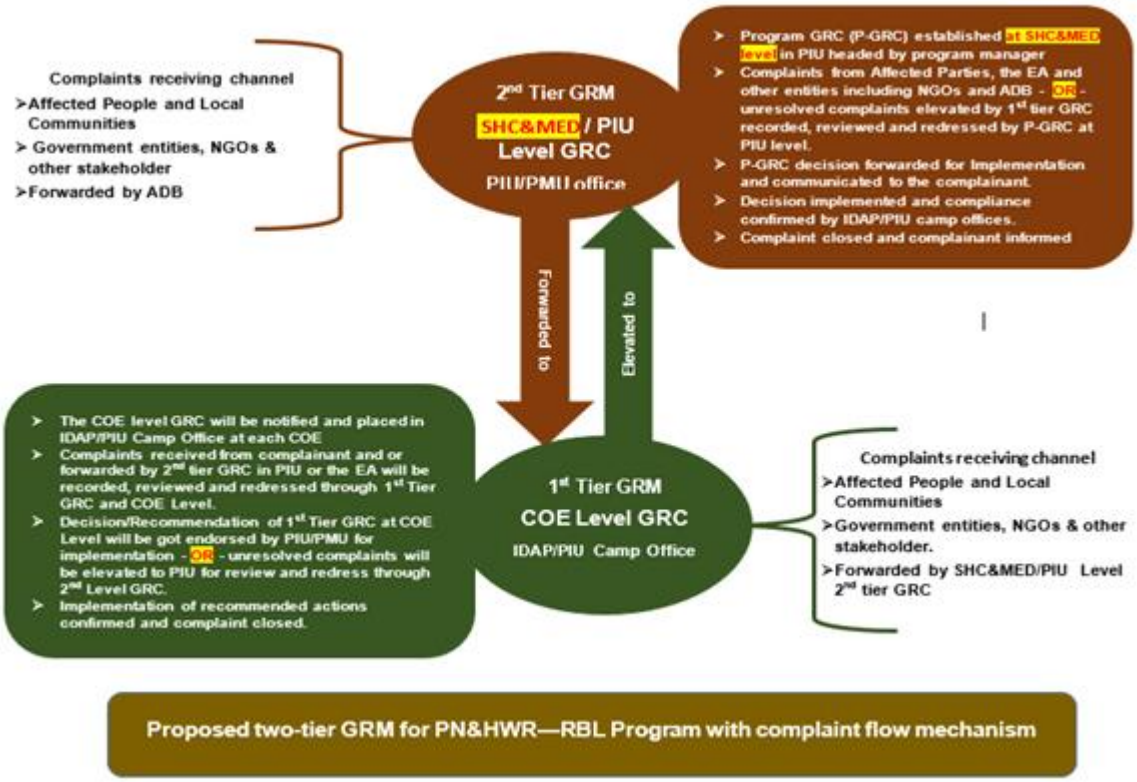
and by carrying out the environmental activities in accordance with provisions of this EARF. Nevertheless, some problems will not be resolved through CPID actions for which a program-based GRM will have to be established to provide an accessible and cost-effective forum to the affected persons and other aggrieved parties to approach and get their concerns and issues resolved. The environmental safeguard issues that can be raised and resolved through project-based GRM may include complaints and concerns on (i) screening and selection of COE sites for program interventions, (ii) identification, assessment and documentation of environmental impacts and risks, (iii) other concerns and issues like damage to existing facilities and interrupted access to resources etc.

86. **Constitution of Grievance Redress Committees (GRCs) at COE and PIU level.** Assessment of institutional setup transpired that a formal grievance redress mechanism with designated focal points is not established in the PMU of SHC&MED. This PSSA suggests a two-tier GRM for the PN&HWR – RBL program. The first tier of GRM will be established at COE level by notifying a COE level grievance redress committee in the respective camp offices established at COE level to be established by General Manager (healthcare projects), IDAP. The 1st tier GRC at COE level, headed by the site manager in the camp office of the implementing partner will include designated representative of the SHC&MED from linked teaching hospital, PIU's safeguard staff and technical/construction supervisors and safeguards management staff from the office/camp office of General Manager (healthcare projects), IDAP to be established for COE in Lahore, Multan and Rawalpindi as its members. Whereas 2nd tier of the GRM will be established by notifying a Program GRC (P-GRC) in the PIU for PN&HWR – RBL program established at IA/EA level by SHC&MED. The P-GRC headed by the Program Director will include representatives of SHC&MED, PIU's technical/engineering staff and safeguards staff as its members. The environmental and social safeguards specialists in PIU will act as focal points for registering the environmental and social safeguards-related complaints and maintain the GRC proceedings and record about social safeguards-related complaints/grievance filed and redress through the P-GRC at PIU level. The proposed multi-tier GRM with complaints flow mechanism for PN&HWR – RBL program is provided in Annex 9 and is considered in detail in EARF and RF enclosed to the PSSA as Annexes 7 and 8.

2.2 Stages in complaints and grievance handling

87. A two-stage grievance redress system will be available to affected persons under the program and if the affected persons are not satisfied with the provided mechanism or opts to approach available remedy under law, they will be at liberty to approach relevant court of law under national legal recourse. Under proposed two-tier GRM, the program GRC (P-GRC) headed by the program manager in PIU will be the ultimate level of grievance redress in the established program-based GRM. The complainants resolved in the GRM will be exempted from all administrative and legal fees that might be incurred are applicable in the resolution process of grievances. The GRM process for the project is presented as under.

Figure 1: Two-tiered GRM Process for PN&HWR – RBL Program



Source: Program documents

i). **First Level of GRM — COE Level GRC:** The notified GRC at COE Level headed by site manager in camp office established for COE or the deputed officer-in-charge in office of the General Manager (healthcare projects), IDAP will maintain a complaint register. All complaints either made by affected parties/stakeholders verbally or in writing to the site manager and/or designated member of the implementing partner or received from the PIU and other government entities will be entered in the complaint register. Within 5 days from the compliant receiving date, the COE level GRC will inform the PIU PN&HWR about type and nature of the complaint and seek technical guidance and support from the PIU safeguards team. After completing investigation process, COE level GRC can invite the aggrieved parties for personal hearing and to arrive at a solution within 30 days from receipt of complaint. The COE level GRC findings and recommendations will be communicated to the PIU for seeking administrative approval before formal communication to the complainants/aggrieved parties.

The efforts will be ensured that the COE level GRC decision is implemented and communicated to the complainant within 45 days from the complaint receiving date and complaint will be closed accordingly. The COE level GRC decision will be communicated to the complainants i.e. the aggrieved individuals/parties. In case, the COE level GRC fails to communicate with the aggrieved person in stipulated time frame, he can raise his complaint to the program level GRC in PIU after lapse of 45 days from the complaint submission date. However, if the complainant

requires, he will be on liberty to elevate his issue directly to the program level GRC (P-GRC) notified in the PIU established by SHC&MED for PN&HWR – RBL program or other administrative and judicial form available to complainant/s.

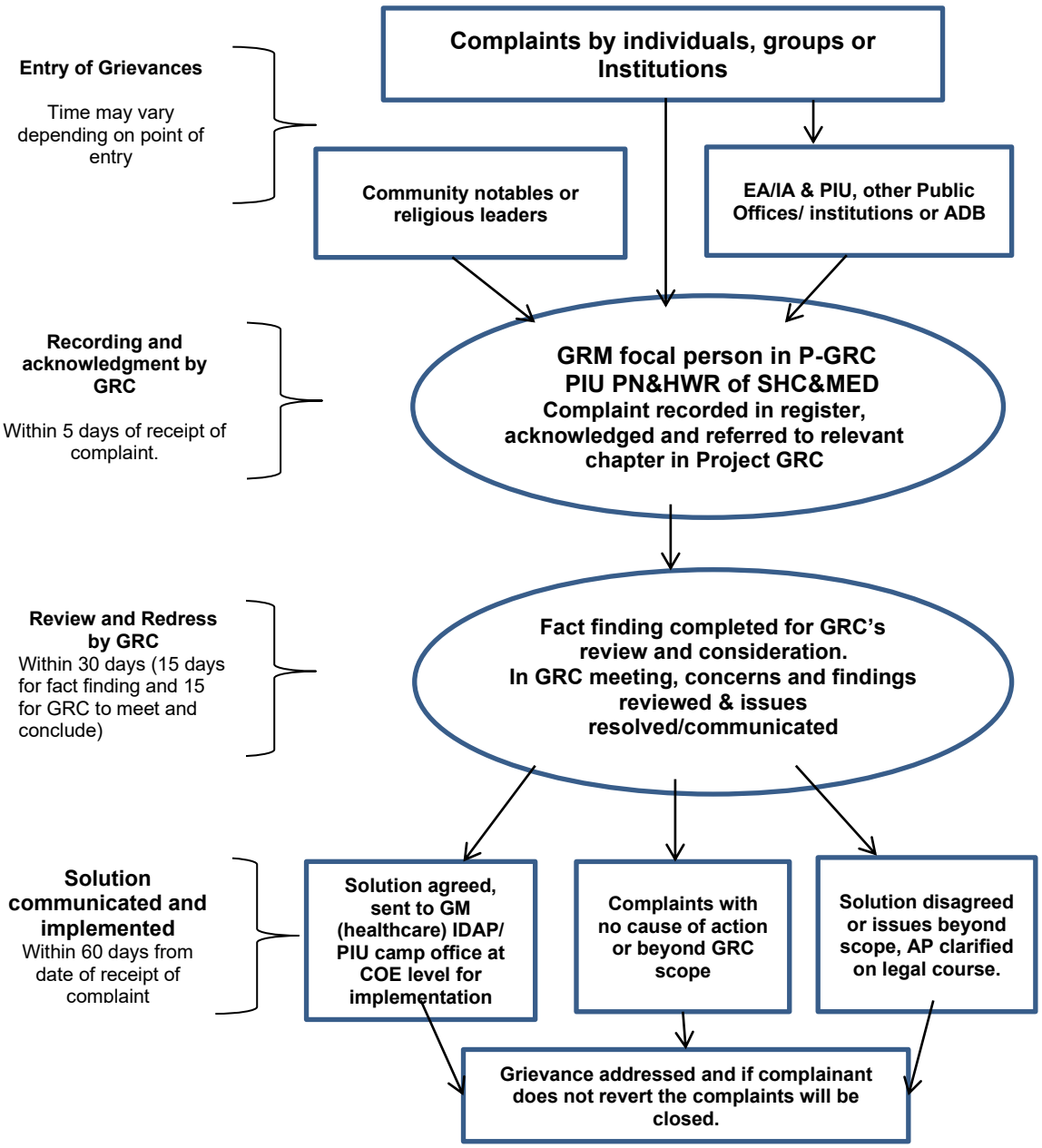
ii). **Second Level of GRM—Program level Grievance Redress Committee (GRC):** The Program level GRC is the ultimate level in the program-based GRM to review and resolve the program related grievances. The Program level GRC headed by the Program Manger will be constituted and notified in the PIU for PN&HWR – RBL Program, established by the SHC&MED in Implementing Agency. The P-GRC will include i) Infrastructure Specialist, ii) Financial Expert and iii) Nursing Education Experts of the PIU as its regular members. Whereas the other specialists staff including, Social and Environment Safeguards, Climate, gender and procurement etc. will be the co-opted members of the GRC who can be swapped based on the nature and type of the complaint. The Program Manager, in coordination with regular members of P-GRC, shall nominate a Complaint Receiving Officer (CRO) to serve as the designated focal person. The CRO will be responsible for registering complaints, coordinating and convening GRC meetings, and maintaining comprehensive records of all GRC proceedings.

Any complaint escalated to the Program GRC or directly submitted to it for review and resolution will be addressed within 60 days from receiving date of the complaint. The program GRC focal person will log complaint in register and will assist the program manager to acknowledge the complainant within 5 days of receipt of the complaint. After initial review and conducting fact finding of the issues raised in complaint, the Program GRC will coordinate with the relevant experts and authorities in the implementing Agency, implementing partner and the execution agency to deliberate on the plausible solutions for redressing the grievance. After due scrutiny, investigation of facts and providing a personal hearing for recording views of the aggrieved person, the P-GRC will conclude and communicate its decision to the aggrieved persons/parties. If the aggrieved persons/parties agree with the decision of P-GRC, it will be implemented, and the complaint will be closed as resolved. If the aggrieved person/party is not satisfied with the decision, he will be on liberty to elevate the issue to the respective court of law and or ADB's Accountability Mechanism. A sequential diagram showing the grievance flow process and timelines to resolve grievances by the program GRC at PMIU/PIU level is presented in **Figure 2** below.

2.3 Grievance Recording and Reporting

88. The COE Level and Program Level GRC will maintain a system for the recording of queries, suggestions, and grievances of the affected persons. All queries, suggestions, and grievances as well as resolutions thereon will be documented, and the record will be maintained for review and subsequent monitoring. The progress on the complaints will be communicated to the IA and EA for their review on a monthly basis or as and when it is required. The EA/IA will ensure that a fully operational GRM is available at PIU and COE levels for smooth and hassle-free handling and redress of complaints.

Figure 2. Grievances Flow with Timelines and Redress System for P-GRC at PIU in SHC&MED



Source: Program documents

F. INSTITUTIONAL ARRANGEMENT AND RESPONSIBILITIES

89. The environmental safeguards assessment, planning, preparation, implementation and monitoring of subprojects described in this EARF involves several institutional actors and distinct processes to be carried out by different agencies. The main institutions that will be involved in the safeguards' activities are the Punjab Specialized Healthcare and Medical Education Department (SHC&MED) as Executing Agency and project management and implementing unit (PMIU)/Project Implementation Unit being established under Special Secretary (Development and Reforms) as Implementing Agency (IA). Meanwhile, the EA/IA will engage Infrastructure Development Authority Punjab as Implementing Partner for Infrastructure Development who will support the IA in procurement, design and implementation of infrastructure development component under output-2. More comprehensive information regarding the institutional setup and safeguards management capacity assessment of executing and implementing agencies are provided in below sections.

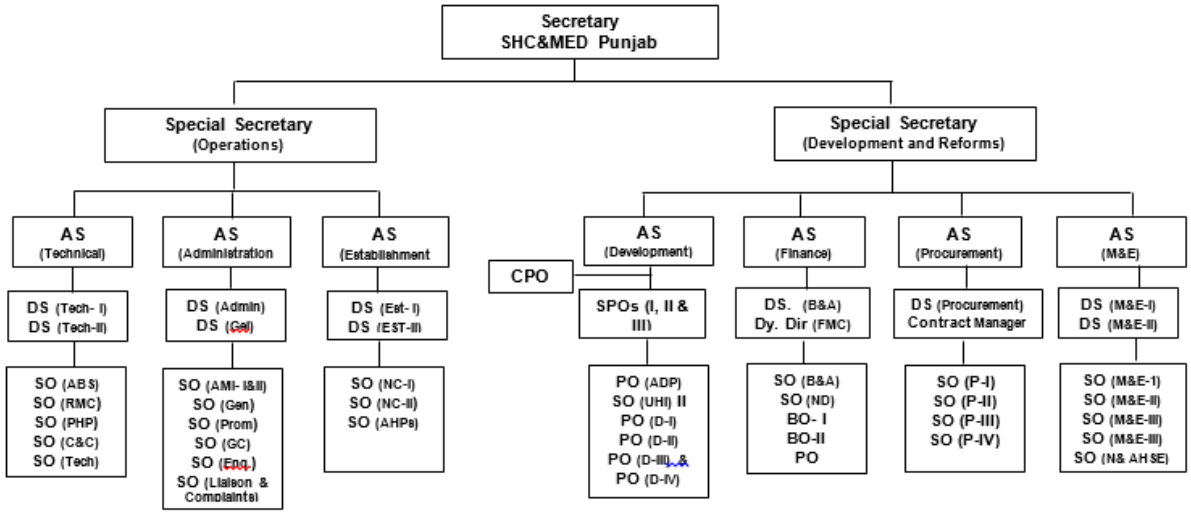
1. Executing Agency: Specialized Health Care and Medical Education Department(SHC&MED)

90. SHC&MED provides curative healthcare services across Punjab through tertiary care hospitals including specialized institutions. Meanwhile it is governing the medical universities, medical colleges, nursing colleges and allied health professional schools and colleges to provide quality medical education to the public. SHC&MED aims to enhance service delivery by revamping the existing infrastructure and adding new schemes for capacity enhancement. However, the SHC&MED lacks in-house capacity and expertise needed for assessment of existing infrastructure, determine and recommend infrastructure rehabilitation requirements, preparing feasibility reports, PC-1s and concept notes for review and approval of competent authorities.

91. SHC & MED operates under the administrative control of the Secretary SHC & MED. For performing mandated regulatory, development and reforms related functions, the Secretary SHC&MED is supported by two special secretaries i.e. Special Secretary (Operations) and Special Secretary (Development and Reforms). Summarized organizational setup presented below exhibit that the Special Secretary (operations) assisted by three Additional Secretaries oversee the technical, administrative and establishment related functions of established heath facilities and medical education institutions. While the Special Secretary (Development and Reforms), assisted by four additional secretaries takes care of development, finance, procurement, monitoring & evaluation related functions mandated to SHC & MED. This structured approach ensures focused attention to each critical area of healthcare and medical education. Review of organization structure of SHC&MED.

92. SHC&MED, being an administrative department, mainly focuses on overall regulation of the health services and medical education facilities, legislation, policy formulation and implementation of reforms agenda for enhanced health services delivery and medical education across the province. It has aimed to enhance the service delivery by revamping the existing infrastructure and by adding new schemes for capacity enhancement. However, the SHC&MED lacked in-house capacity and expertise needed for assessment of existing infrastructure, determine and recommend infrastructure rehabilitation and upgradation requirements, preparing feasibility reports including required safeguards due diligence documents for including IEEs/EMPs for IFI funded projects, PC-1s and concept notes for review and approval of Competent Authorities.

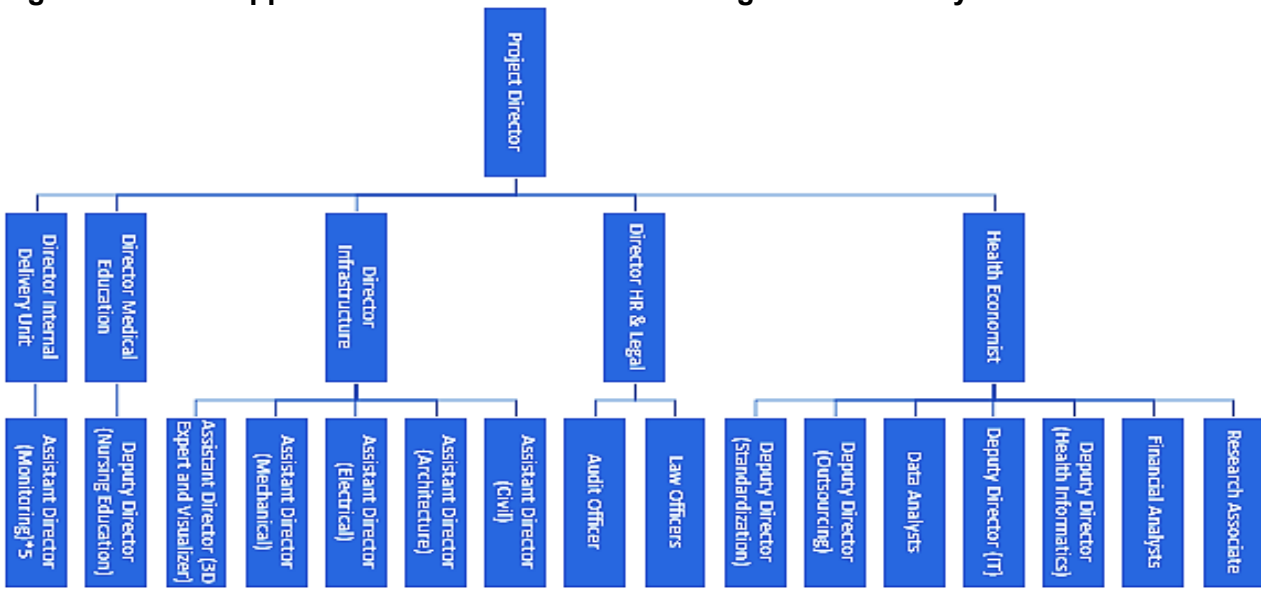
Figure 3. Simplified Organizational Structure of the SHC&MED



Source: SHC&MED

93. The SHC&MED has planned to establish a Project Management Unit (PMU) under the Specials Secretary (Development and Reforms) for engaging the required expert staff to overcome its capacity constraints. As per approved PC-1, the PMU headed by a Project Director will have the skilled professionals across diverse fields such as health economist and Directors with needed technical expertise for HR & Legal, Infrastructure, Medical Education and internal delivery etc. The goal of establishing the PMU is to ensure that the SHC&MED has the necessary expertise in these critical areas to effectively assess, plan, manage and oversee its development projects and its operations. In presented organogram below, the positions presented in the blue boxes is PDWP approved PMU structure for SHC&MED.

Figure 4. PDWP Approved Structure of the PMU Being Established by SHC&MED



Source: SHC&MED

94. The Project Management Unit (PMU) being established under the SHC&MED will perform following key functions:

a) Research and device new policies for improvement in clinical services of teaching hospitals.
b) Plan, design and prepare cost estimates, conduct cost monitoring, and forecast the new projects ensuring optimum utilization of hospital resources.
c) Coordinate efforts to conceptualize and implement new ideas or innovations in healthcare services.
d) Ensure seamless integration of new initiatives into existing systems and processes.
e) Facilitate collaboration among different teams and stakeholders involved in the implementation of reforms agenda and upgradation and enhancement of physical infrastructure of hospitals to meet modern standards and improve patient care.
f) Supporting the procurement wing of SHC&MED for acquiring new equipment and services necessary for hospital upgrades and improvements.
g) Support medical education wing to review the existing mechanism and structure of medical education system through Central Induction Policy of Level I, Level II, Level III, and Allied Health Professionals
h) Oversee clinical education and professional practice development system and interventions design including operational plans, project preparation and support for decision-making
i) Perform any other task assigned by the Specialized Healthcare & Medical Education Department

95. **Grievance Redressal Mechanism (GRM):** SHC&MED has established mechanisms to address public concerns:

- Public Grievance Redressal System (PGRS): An online platform that allows citizens to lodge grievances regarding public services, ensuring transparency and accountability.
- Complaints and Suggestions Portal: A dedicated section on the SHC&MED website where individuals can submit feedback and complaints related to healthcare services and medical education.

96. While SHC&MED has established grievance redressal mechanisms, there is a need for a formal GRM at the Project Management Unit (PMU) level, especially for donor-funded projects.

97. **Environment Safeguards.** The Specialized Healthcare & Medical Education Department (SH&MED) currently lacks a dedicated safeguard unit or environmental and social specialists within its structure. This gap limits the department's ability to directly manage environmental and social risks associated with its projects. As a result, assessment and social and environmental aspects of development projects, environmental approvals, as well as Initial Environmental Examinations (IEE), are often outsourced and handled through external consultants or implementation partners, such as the Infrastructure Development Authority Punjab (IDAP).

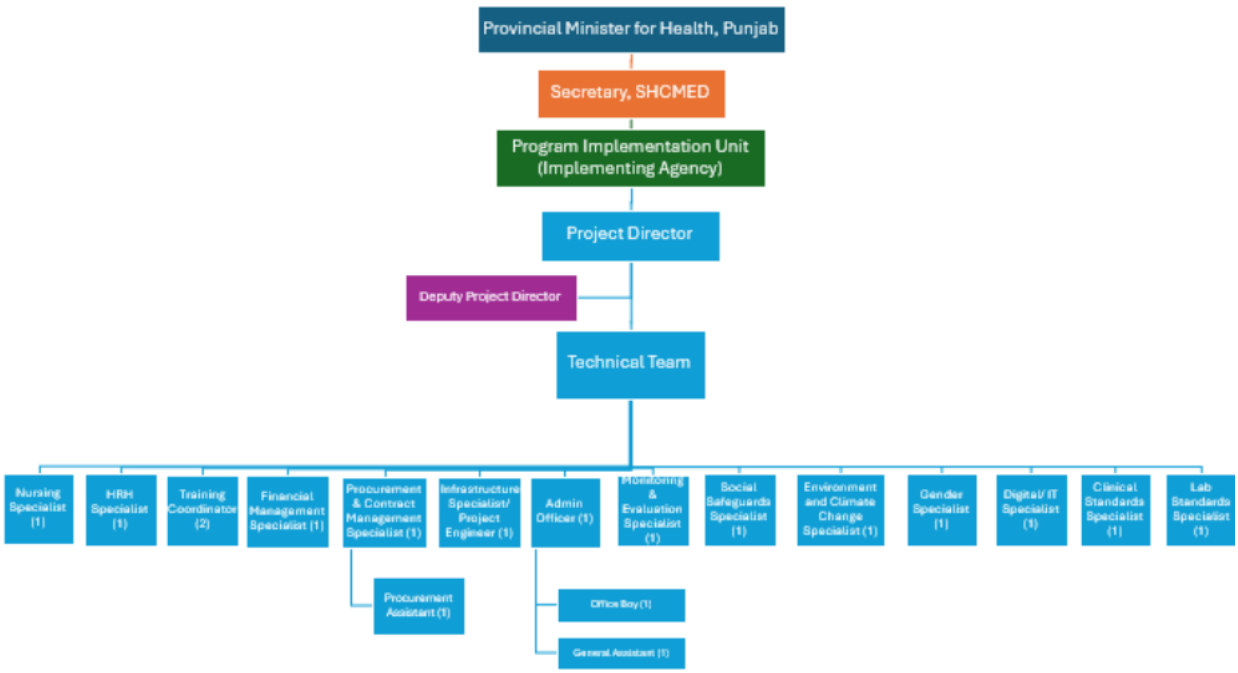
2. Implementing Agency: Program Implementation Unit (PIU) of SHC&MED

98. **Program implementation Unit (PIU).** The review of PMU structure and approved PC-I transpired that many key expert positions including environmental and social safeguard specialists needed for ensuring compliance with outlined safeguard requirements of the international financial institutions (IFIs) like Asian Development Bank (ADB) and World Bank (WB) etc. are skipped in the PMU. Therefore, it is recommended that a project implementation unit with requisite expert staff position should be established for augmenting the capacity of the PMU and to ensure that the implementation of the Health RBP Program is compliant with the outlined

policy requirements of the ADB. It is aimed that the recommended project implementation unit (PIU) for delivery of RBL program will be mandated to operate as Implementing Agency for the ADB financed PN&HWR – RBL program. Organogram below (Figure 5) exhibit the recommended staff positions including program manager and required key expert staff for delivery of PN&HWR – RBL program to be engaged for Project Management Unit / Project Implementation Unit of the SHC&MED.

99. Under the proposed scheme hiring of dedicated environmental and social safeguards specialists in PIU is envisaged who will be responsible for assisting the implementing Agency (IA) in safeguards risk screening of the sites being selected and eligible for program interventions and establishing COE for nursing education under Output-2. The TOR for hiring of social safeguards specialist in PIU is attached as Appendix 5. The proposed safeguards staff in the PIU will assist the IA in screening of safeguards risks, conducting detailed assessment of environmental and social impacts, stakeholders' consultation and preparation of safeguards due diligence documents including IEEs, EMPs and RPs (if needed) to comply national regulations and safeguards policy requirements of the ADB. The environmental safeguards expert will supervise and monitor implementation progress of environmental safeguard related interventions as well as occupational and community health and safety requirements including compliance with core labour standards (CLC). Environmental safeguards specialists will assist the PIU and IA in preparation and submission of periodic progress reports and consolidated safeguards monitoring reports separately for environment and social safeguards. In case of noted safeguards implementation gaps, the safeguards staff will assist the IA/EA in preparation and implementation of Corrective Action Plans (CAPs) as needed and the IA/EA will be supported in establishing fully operational multi-tier program-based grievance redress mechanism (GRM).

Figure 5. Proposed Organogram of the PIU



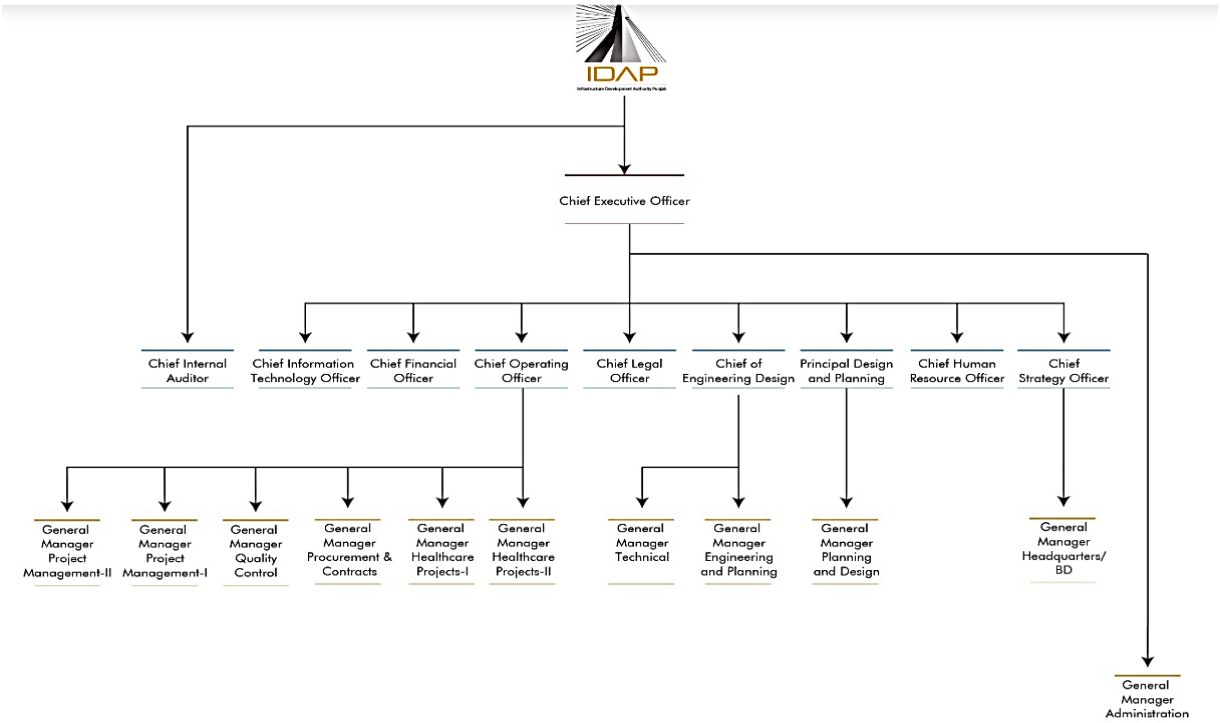
Source: Program documents

3. Service Provider: The Infrastructure Development Authority Punjab (IDAP)—

100. The EA/IA will select Infrastructure Development Authority Punjab (IDAP) as a service provider for infrastructure development and procurement of allied furniture and fixtures, under output-2 of the program i.e. establishment of COEs. The IDAP as service provider will lead the tendering and procurement process for engaging design & construction supervision consultants and civil works contractors for designing, supervision and implementation of the construction activities at site for each COE. It will also support the procurement of allied furniture and fixtures in the COEs.

101. The Punjab government established the IDAP in 2016 under the IDAP Act of 2016 for execution of mega infrastructure development projects efficiently, aesthetically, and transparently and without compromising quality or entailing delays. It provides complete project management services including feasibility, design, contract management, execution, supervision and third-party evaluation of the mega infrastructure project. Since, the IDAP has been working for multiple infrastructure development projects, so it has established dedicated set-up headed by General Managers for project management, quality control, procurement and contracts as well as for implementing healthcare projects under the Chief Operating Officer. Meanwhile, under the Chief of Engineering and Design in IDAP, the offices of General Managers technical, planning and design are in operation to supervise technical, engineering and planning activities. Organogram of IDAP is provided as figure-4 below.

Figure 4. Organizational Set-up of the IDAP



Source: IDAP.

102. The IDAP structure show that it has General Managers with their support team for planning, design, procurement and implementation of mega healthcare projects that confirm the hands-on experience of IDAP in dealing with development of health related infrastructure. During consultations, it was informed that the IDAP does not have dedicated unit to oversee the Environmental safeguards compliance requirements under policies of the International Financial Institutions like ADB. However, it has deployed a qualified Environment Specialist under the General Manager (GM) Technical and a Health, Safety, and Environment (HSE) Specialist under the GM Quality Control. The Environmental Specialist and the HSE Specialist are mainly responsible for ensuring compliance with National/Provincial level environmental legal framework across all projects being executed by the IDAP. Review of existing environment management capacity transpired that the role of deployed staff is limited to review of environment safeguards document and monitoring reports prepared and delivered by the design and construction supervision consultants and they are not involved in screening and assessment of environment risks/impacts, preparation and implementation of environment safeguards due diligence documents including IEEs, EMPs, SSEMPs and periodic environmental monitoring reports etc. So, the IDAP outsources such studies and activities to the experienced consulting firms. There is no dedicated GRM setup in the IDAP.

103. In case IDAP is engaged as service provider, under its existing institutional set-up and system, procurement of consultants, works contractors and equipment for COEs in Lahore, Multan and Rawalpindi will be executed through the office of the GM procurement and implementation and supervision of project works will be steered through the offices of General Manager (healthcare projects) located within IDAP at Lahore, because there is no region level establishment of the IDAP. In addition to procuring design/construction supervision consultants and civil work contractors, IDAP will have to engage and mobilize the construction site management technical and administrative staff for establishing a fully equipped camp office to track and supervise the day to day work progress at site.

104. The execution of designed infrastructure development activities under PN&HWR – RBL program are subject to comply the safeguards requirements outlined in this EARF and the ADB's SPS 2009, therefore, it is suggested that the EA (SHC&MED) / IA (PMU/PIU) should ensure that Environment Safeguards consultant and expert EHS staff is deployed by IDAP for each COE camp office / site through Design/Construction Supervision Consultant to be engaged for delivery of COEs. The Environment safeguards consultant in coordination with the IDAP's environment specialist will conduct screening and assessment of environmental impacts, preparation of IEEs including EMPs for each COE sites, supervise and monitor the progress about day to day environmental management and monitoring activities performed by the contractor to comply the outlined provisions in the IEE/EMP and SSEMPs etc. Further, it will support IA to establish and operationalize COE level GRM in the camp office established to execute and supervise the construction works for each COE. The environment safeguards consultant and EHS staff in each COE camp office will maintain baseline information and record about noted safeguard noncompliance issues and EHS risks, record of grievance received/resolved for each COE site and in addition to providing safeguards-related input in program progress reports, he will support the environment safeguards staff in IDAP for preparing and timely delivery of environment monitoring reports for IA's/EA's review and endorsement.

G. MONITORING AND REPORTING

1. Overview

105. All IEEs/EMPs will be subject to monitoring to review progress on EMP implementation activities, adjust for effective implementation, identify issues of concern, prepare and implement corrective actions if required to meet the objectives of SPS 2009 requirements provisions of this EARF.

2. Monitoring

106. The regular environmental monitoring to check compliance of the project implementation process to the mitigation program set in the EMP and effectiveness of mitigation measures shall be implemented by IA-PIU. The IA-PIU environmental safeguards specialist shall conduct monthly monitoring field visits for every subproject of the overall RBL Program. The findings of the monitoring visits shall be recorded in the monitoring checklist. The monitoring checklist could be updated by IA-PIU by assistance of ADB TA consultant to more effectively respond to subproject's specificity.

107. The IA-PIU delegates the responsibility on daily environmental supervision on the Supervision Consultants. The site supervisors shall oversee also the environmental and health & safety issues and timely inform the IA-PIU on non-conformances detected on-site.

108. From the cost-effectiveness perspective the monitoring measurements of environmental parameters on dust, water, noise and vibration shall be implemented depending on project specific characteristics: proximity to water bodies, to sensitive receptors, as well as depending on complaints raised by APs.

109. The non-conformance detected during the monitoring actions shall be corrected by contractor in accordance with the following corrective action procedures: IA-PIU sets a deadline for improvement, the contractor informs the supervision consultant on correction actions, the supervision consultant documents the action and reports to IA-PIU. Should non-conformance be not corrected during the set timeframe the penalty measures will be applied: noncompliance notice issued by IA-PIU and payment of corresponding civil works shall be suspended until the corrective action undertaken or the payment shall be reduced on environmental costs.

3. Reporting

110. The PIU will prepare and submit environmental safeguards monitoring reports to ADB bi-annually throughout program implementation period. However, the monitoring frequency for the sites will be explained in the respective IEEs. So, to that extent the monitoring frequency outlined in the EA endorsed and ADB-accepted IEE will be followed. The safeguards staff in PIU will prepare periodic monitoring reports including progress on mitigation measures implementation, grievance redress and other environmental issues and corrective actions implemented for the review of IA/EA and sharing with ADB as and when needed. All monitoring reports will be disclosed on the websites of IA/EA and the ADB, as and when cleared by ADB.

Appendix 1: Rapid Environmental Assessment Checklist (REA Checklist)

Country/Project Title:

Investment Title:

Sector Division: **Buildings**

Date:

Screening Questions	Yes	No	Remarks
A. Investment Siting **Is the Investment area adjacent to or within any of the following areas?**			
▪ **Underground utilities**			
▪ **Cultural heritage site**			
▪ **Protected area**			
▪ **Wetland**			
▪ **Mangrove**			
▪ **Estuarine**			
▪ **Buffer zone of protected area**			
▪ **Special area for protecting biodiversity**			
▪ **Bay**			
C. Potential Environmental Impacts **Will the Investment cause…**			
▪ Encroachment on historical/cultural areas?			
▪ Encroachment on precious ecology (e.g. sensitive or protected areas)?			
▪ Impacts on the sustainability of associated sanitation and solid waste disposal systems?			
▪ Dislocation or involuntary resettlement of people?			
▪ Disproportionate impacts on the poor, women and children, Indigenous Peoples, or other vulnerable groups?			
▪ Accident risks associated with increased vehicular traffic, leading to loss of life?			
▪ Increased noise and air pollution resulting from increased traffic volume?			
▪ Occupational and community health and safety risks?			
▪ Risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during construction and operation?			
▪ Generation of dust in sensitive areas during construction?			
▪ Requirements for disposal of fill, excavation, and/or spoil materials?			
▪ Noise and vibration due to blasting and other civil works?			
▪ Long-term impacts on groundwater flows as result of needing to drain the investment site prior to construction?			
▪ Long-term impacts on local hydrology as a result of building hard surfaces in or near the building?			

Screening Questions	Yes	No	Remarks
▪ Large population influx during construction and operation that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)?			
▪ Social conflicts if workers from other regions or countries are hired?			
▪ Risks to community safety caused by fire, electric shock, or failure of the buildings' safety features during operation?			
▪ Risks to community health and safety caused by management and disposal of waste?			
▪ Community safety risks due to both accidental and natural hazards, especially where the structural elements or components of the investment are accessible to members of the affected community or where their failure could result in injury to the community throughout construction, operation, and decommissioning?			

Appendix 2. Environmental Safeguard Policy Principles

#	Environmental Safeguard Principle
1.	**Principle 1:** Use a screening process for each proposed project, as early as possible, to determine the appropriate extent and type of environmental assessment so that appropriate studies are undertaken commensurate with the significance of potential impacts and risks.
2.	**Principle 2:** Conduct an environmental assessment for each proposed project to identify potential direct, indirect, cumulative, and induced impacts and risks to physical, biological, socioeconomic (including impacts on livelihood through environmental media, health and safety, vulnerable groups, and gender issues), and physical cultural resources in the context of the project's area of influence. Assess potential trans boundary and global impacts, including climate change. Use strategic environmental assessment where appropriate.
3.	**Principle 3.** Examine alternatives to the project's location, design, technology, and components and their potential environmental and social impacts and document the rationale for selecting the particular alternative proposed. Also consider the no project alternative.
4.	**Principle 4:** Avoid, and where avoidance is not possible, minimize, mitigate, and/or offset adverse impacts and enhance positive impacts by means of environmental planning and management. Prepare an EMP that includes the proposed mitigation measures, environmental monitoring and reporting requirements, related institutional or organizational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators. Key considerations for EMP preparation include mitigation of potential adverse impacts to the level of no significant harm to third parties, and the polluter pays principle.
5.	**Principle 5:** Carry out meaningful consultation with affected people and facilitate their informed participation. Ensure women's participation in consultation. Involve stakeholders, including affected people and concerned nongovernment organizations, early in the project preparation process and ensure that their views and concerns are made known to and understood by decision makers and taken into account. Continue consultations with stakeholders throughout project implementation as necessary to address issues related to environmental assessment. Establish a GRM to receive and facilitate resolution of the affected people's concerns and grievances regarding the project's environmental performance.
6.	**Principle 6:** Disclose a draft environmental assessment (including the EMP) in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. Disclose the final environmental assessment, and its updates if any, to affected people and other stakeholders.
7.	**Principle 7:** Implement the EMP and monitor its effectiveness. Document monitoring results, including the development and implementation of corrective actions, and disclose monitoring reports.
8.	**Principle 8:** Do not implement project activities in areas of critical habitats, unless (i) there are no measurable adverse impacts on the critical habitat that could impair its ability to function, (ii) there is no reduction in the population of any recognized endangered or critically endangered species, and (iii) any lesser impacts are mitigated. If a project is located within a legally protected area, implement additional programs to promote and enhance the conservation aims of the protected area. In an area of natural habitats, there must be no significant conversion or degradation, unless (i) alternatives are not available, (ii) the overall benefits from the project substantially outweigh the environmental costs, and (iii) any conversion or degradation is appropriately mitigated. Use a precautionary approach to the use, development, and management of renewable natural resources.
9.	**Principle 9:** Apply pollution prevention and control technologies and practices consistent with international good practices as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health and Safety Guidelines. Adopt cleaner production processes and good energy efficiency practices. Avoid pollution, or, when avoidance is not possible, minimize or control the intensity or load of pollutant emissions and discharges, including direct and indirect greenhouse gases emissions, waste generation, and release of hazardous materials from their production, transportation, handling, and storage. Avoid the use of hazardous materials subject to international bans or phase-outs. Purchase, use, and manage pesticides based on integrated pest management approaches and reduce reliance on synthetic chemical pesticides.
10.	**Principle 10:** Provide workers with safe and healthy working conditions and prevent accidents, injuries, and disease. Establish preventive and emergency preparedness and response measures to avoid, and where avoidance is not possible, to minimize, adverse impacts and risks to the health and safety of local communities.
11.	**Principle 11:** Conserve physical cultural resources and avoid destroying or damaging them by using field-based surveys that employ qualified and experienced experts during environmental assessment. Provide for

the use of “chance find” procedures that include a pre- approved management and conservation approach for materials that may be discovered during project implementation.

Appendix 3: The National IEE Outline

Clause No	Requirement for Preparation and Review of Initial Environmental Examination (IEE)
2.3 (A)	**Executive summary** should include: 1. Title and location of project 2. Name of the proponent 3. Name of the organization preparing the report 4. A brief outline of the proposal 5. The major impacts 6. Recommendation for mitigation measures 7. Proposed monitoring
2.3 (B)	**Introduction** should include: 1. Purpose of the report 2. Identification of project and proponent 3. Details of consultant 4. Brief description of nature, size and location of project
2.3 (C)	**Description of the project** should include: 1. Type and category of project 2. Objectives of project 3. Alternative considered realistically (in detailed) and reason for their rejection 4. Location and site layout of the project (May be annexed at the end of report) 5. Land use on the site 6. Road access 7. Vegetation features of the site 8. Cost and magnitude of operation 9. Schedule of implementation 10. Description of the project 11. Restoration and rehabilitation plans 12. Government approvals
2.3 (D)	**Description of environment** should include: 1. Clear-cut picture of existing environmental resources o Physical o Ecological o Socioeconomics 2. Quality of life values 3. Lab reports of environmental analysis
2.3 (E)	**Screening of potential Environmental impacts and mitigation measures** should include: • Environmental parameters regarding 1. Project Location 2. Design 3. During construction phase

4. During operational phase
5. Potential Environmental Enhancement Measure

Environmental management and monitoring program should include:

- Institutional Capacity
- Training Schedules
- Summary of Impacts and their mitigation measures

2.3 (F)

- Equipment maintenance details
- Environmental budget

2.3 (G) Conclusions

This section should include an evaluation of the screening process and should highlight whether significant environmental impacts exist which needs further detailed study or an EIA. The IEE report should present the conclusions of the study briefly and concisely.

Appendix 4. TOR for Environment Specialist

Terms of References (TORs) for Environment Specialist

Introduction

The proposed Punjab Nursing and Health Workforce Sector Reform Program supports strengthening of health workforce education, governance, and training systems to address Punjab's critical healthcare needs. The revised scope of the program aligns with the strategic priorities of the Government of Punjab and the program's long-term objectives subject to ADB's results-based lending (RBL) and safeguards regulations.

The proposed program intends to address these key constraints and support the government of Punjab through the following three outputs:

Output 1: Quality of nursing professionals improved

- enhancing faculty capacity through addressing training, quantity, quality, and establishing faculty positions;
- development of enhanced training methods and curriculum;
- development and improvement of continuing professional education standards;
- developing minimum standards for nursing education facilities;
- establishing digital connectivity between existing nursing schools and the COEs, and
- developing student rotation programs to provide COE skill lab and simulation lab access for all public sector nursing students

Output 2: Climate-resilient and gender-sensitive COEs for nursing education established. This output will address critical infrastructure needs by addressing:

- climate-resilient infrastructure for three nursing centers of excellence (teaching space and hostels) in Punjab;
- equipment needed for COE training facilities and housing facilities;
- digital infrastructure and equipment for COEs and existing nursing schools (for both training and management); and
- institute for health professional education to be included in the COEs.

Output 3: Governance and management for health workforce strengthened through:

- support for developing a health workforce planning and management system;
- establishment of digitized health workforce management systems;
- private sector participation in quality benchmarking for COEs and service provision; and
- development of supporting legislation, policies, and strategies

Implementation arrangements. The executing agency will be the Specialized Healthcare & Medical Education Department (SHC&MED), and the implementing agency will be the Project Management Unit (PMU) and Project Implementing Unit (PIU) of the SHC&MED.

Scope of Assignment

The Environmental Safeguards Specialist will assist the EA (SHC&MED) and the IA-PIU by (i) screening and assessing environmental risks and impacts to selected three greenfield locations in South, Central and North Punjab, for the centers of excellence (COEs); ii) preparing, implementing, and monitoring environmental safeguards documents including national IEEs /EMPs (as required) and environmental monitoring reports, (iii) developing the safeguards

management capacity of the IA and maintaining environmental safeguards and occupational and community health and safety (OH&S) record and databases.

Detailed Tasks

a. Screening/assessment of environmental risks to selected three greenfield locations in South, Central and North Punjab, for the centers of excellence (COEs).

The specialist shall:

(i) Assist the IA in checking environmental risk screening and selected COE sites eligible for program interventions under Output-2. This will confirm the environment category based on-site selection criteria presented in Appendix 4 of EARF, ensuring that any activities, potentially falling under category A as per ADB SPS 2009 are excluded from the RBL Program.

(ii) Prepare and submit the ADB rapid environmental assessment (REA) screening checklists (template included in the EARF appended with the PSSA) for all eligible COE sites. This will screen and categorize program activities, focusing on the 'critical environmental safeguards triggers' during the site selection process.

(iii) Assist the IA/EA in establishing fully operational GRM at IAs level. Facilitate the IA in tracking complaints, conducting field investigations, and addressing environmental safeguards-related complaints/grievances raised by affected people.

b. Environmental impact assessment, preparation, implementation and monitoring.

For selected sites involving minor environmental impacts, the safeguards specialist will:

(iv) Conduct detailed environmental impact assessment and coordinate the preparation of IEEs according to national regulation[11] for subsequent subprojects. This includes also updating existing IEEs based on detailed design and technical studies or changes in scope, design, or unanticipated impacts in case of need;

(v) Identify experts and prepare terms of reference for environmental and technical studies that may be required during project implementation;

(vi) Assist the IA/EA in responding the comments on national IEEs, and ensure disclosure of approved by Environmental Protection Agency (EPA Punjab) IEEs on SHC&MED website);

(vii) Ensure that bidding and contract documents include specific provisions requiring Contractors to comply with: (i) all applicable labor laws and core labor standards including (a) prohibition of child labor as defined in national legislation for construction and maintenance activities; (b) equal pay for equal work of equal value regardless of gender, ethnicity and elimination of forced labor; (ii) the requirement to disseminate information on sexually transmitted diseases including HIV/AIDS, to employees and local communities surrounding the project sites; and (iii) specific environmental safeguard covenants in loan/grant/financial agreements;

(viii) Ensure approved national IEEs are disclosed in project websites and summary posted in public areas accessible and understandable by local people;

(ix) Ensure EMPs are included in the bid documents and contracts;

(x) Obtain all necessary clearances, including approval of national IEE from EPA Punjab, permits, consents, etc. Ensure compliance to the provisions and conditions;

(xi) Review contractors' site-specific EMPs (SSEMPs) to ensure compliance with the IEE;

[11] In accordance with the Punjab Environmental Protection Act 2012, Review of IEE EIA Regulations 2022 and Delegation of Powers for Environmental Approvals Rules, 2017.

(xii) Take corrective actions when necessary to ensure no residual environmental as well as health and safety impacts. If necessary, prepare Corrective Action Plan and ensure implementation of corrective actions by the contractor;
(xiii) Submit progress report on implementation of the Corrective Action Plan(s) to ADB;
(xiv) Oversee day to day implementation of SSEMPs by contractors, including compliance with all government rules and regulations;
(xv) Coordinate with consultants and contractors on mitigation measures involving the community and affected persons and ensure that environmental and health and safety concerns and suggestions are incorporated and implemented;
(xvi) Track and monitor IEE/EMP implementation and include implementation results in periodic progress reports for IA/EA, and ADB project team.
(xvii) Consolidate and deliver environmental safeguards monitoring reports annually or as committed in the approved IEEs semiannually.
(xviii) Prepare and deliver post-construction environmental audit report (PCEAR) according to the template proposed in EARF for the completed subprojects.

C. Capacity Development of the PIU Environmental Specialist.

(xix) Prepare information, communication, consultation and monitoring tools/checklists and provide training to the PIU environmental Specialist.
(xx) Organize and facilitate training program for better understanding of the PIU safeguards team about the ADB's environmental safeguards policy requirements, occupational and community health and safety, EMP implementation especially hazardous materials (including asbestos) management, grievance redress mechanism and public consultations, assessment and handling environmental risks and construction related environmental impacts related issues.
(xxi) Provide guidance and hands-on capacity development and on-job training to the PIU's environmental specialist.
(xxii) Document training reports and share with participants, and report capacity building activities in periodic environmental monitoring reports.

Qualifications

- Master's degree or higher in Environmental Science, Environmental Management, Environmental Engineering, OHS, Sustainable Development, or other related field.
- At least 7 years post qualification experience in implementation of environmental safeguards.

Skills

- Expertise in environmental safeguards implementation and integrating environmental considerations into program design.
- Expertise in screening and assessment of environmental safeguards risks and adaptation of mitigation measure to avoid and minimize the impacts by exploring alternative site and/or design solutions.
- Excellent communication, collaboration, and stakeholder engagement skills, with the ability to influence diverse groups.

Other Skills

- Strong analytical and problem-solving abilities, especially in environmental date management.
- Capacity to manage complex, multi-stakeholder projects, ensuring alignment with environmental objectives.

Person months

- 60 Person Months (may be extended depending on extension of loan closing time line)

Intermittent or continuous

- Continuous

ANNEX 7: RESETTLEMENT FRAMEWORK (RF)

CURRENCY EQUIVALENTS

(as of 15 April 2025)

Currency unit	–	Pakistan rupee/s (PKR)
PKR 1.00	=	$0.0036
$1.00	=	PRs280.5

ABBREVIATIONS

ADB	Asian Development Bank
AHs	affected households
CAS	compulsory acquisition surcharge
CE	Chief Engineer
CPID	community participation and disclosure
CSOs	civil society organizations
C&W	Communications and Works
DMS	detailed measurement survey
GOP	Government of Pakistan
GOPb	Government of Punjab
GRC	grievance redressal committee
GRM	grievance redressal mechanism
IA	implementing agency
IDAP	Infrastructure Development Authority Punjab
IP	indigenous people
IPP	indigenous peoples' plan
IR	involuntary resettlement
ISA	initial social assessment
LAA	Land Acquisition Act
LAC	land acquisition collector
IR	involuntary resettlement
RF	resettlement framework
RP	resettlement plan
NGOs	nongovernment organizations
PIU	Program Implementation Unit
PMU	Project Management Unit
PN&HWR	Punjab Nursing and Health Workforce Reforms
PEF	Punjab Education Foundation
SES	socioeconomic surveys
SHC&MED	Specialized Health Care and Medical Education Department
SPS	Safeguard Policy Statement
TOR	terms of reference

Annex 7

GLOSSARY

compensation	Payment in cash/voucher or kind offered to affected persons against the replacement of the lost asset, resource and income.
country safeguard systems	A country's legal and institutional framework, consisting of its national, sub national, or sectoral implementing institutions
cut-off-date	Eligibility for entitlements by a cut-off date, determined as the completion day of social impact assessment (SIA) survey including impact assessment to prepare inventory of lost assets, affected persons census and socioeconomic baseline survey.
affected household	A household affected by the project-related impacts to their assets (land/structure, trees and crops etc.) including asset losses (permanent or partial), induced changes in land use rights or restricted access to productive resources and income losses.
economic displacement	Loss of productive assets i.e. land, commercial structures/assets, and income sources, or means of livelihoods as a result of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas.
encroachers	People who move into the project area after the cut-off date and are therefore not eligible for compensation or other rehabilitation measures provided by the project or persons who have trespassed government land, adjacent to his/her own land or asset, to which he/she is not entitled, by deriving his/her livelihood there. Such act is called "encroachment".
entitlement	The range of measures comprising compensation in cash/voucher or kind, relocation cost, income rehabilitation assistance, transfer assistance, income substitution, and business restoration which are due to affected persons, depending on the type and degree nature of their losses, to restore their social and economic base.
household	A household means all persons living and eating together as a single-family unit and eating from the same kitchen whether they are related to each other.
implementing agency	Implementing agency means the agency, public or private, that is responsible for planning, design and implementation of a development project.
income restoration	Income restoration means re-establishing income sources and livelihoods of affected persons.

Inventory of lost assets	Descriptive list of all assets lost to the project, including land, immovable property (buildings and other structures), and incomes with names of owners.
involuntary resettlement	Land acquisition and resettlement for a public purpose based on eminent domain law without the consent of displaced persons.
land acquisition	Land acquisition means the process whereby a person is compelled by a public agency to alienate all or part of the land she/he owns or possesses, to the ownership and possession of that agency, for public purposes in return for fair compensation.
physical displacement	Relocation because or lost residential land and structure, or shelter because of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or no access to legally designed parks and protected areas.
rehabilitation	Assistance provided to APs to supplement their income losses to improve, or at least achieve full restoration of, their pre-project living standards and quality of life.
replacement Cost	Compensation for acquired land, structures and other assets, including (i) fair market value, (ii) transaction costs, (iii) interest accrued, (iv) transitional and restoration costs, and (v) other applicable payments, if any.
vulnerable APs	Distinct groups of people who might suffer disproportionately from resettlement effects by the project because of their disadvantaged or vulnerable status. They are the households below poverty line or will become below poverty line because of loss to assets and/or livelihoods and include the landless and those without legal title to acquired land, the elderly, female headed households, or disabled persons.

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I. INTRODUCTION

A. Project Background

1. Punjab's healthcare system is facing an unprecedented crisis, with an acute shortage of nurses, inadequate infrastructure, and governance challenges that threaten its ability to meet the province's growing health needs. Recognizing the urgent need for structural transformation, the Government of Punjab has prioritized comprehensive health sector reforms, including investments in high-quality medical and nursing education, enhanced workforce governance, and the integration of international best practices into healthcare service delivery. The Punjab Nursing Education Reform Strategy 2025–2030 has been developed by the Specialized Healthcare & Medical Education Department (SHC&MED) in collaboration with the ADB that highlights key policy interventions, including faculty capacity building, accreditation reforms, and the establishment of career pathways for nursing professionals. It outlines a structured roadmap for scaling up nursing education, strengthening workforce governance, and ensuring long-term sustainability of healthcare workforce development.

B. Project Description

2. To respond the challenges and address the issue systematically, the Punjab Nursing and Health Workforce Reform Program (PN&HWRP) is designed with the Asian Development Bank's (ADB's) financial assistance through Results-Based Lending (RBL). The key objectives of the program include i) enhancing the quality of nursing education, ii) establishing state-of-art infrastructure and iii) strengthening governance and health workforce management in Punjab. The program will achieve its objectives through the following outputs:

- **Output-1 — Quality of nursing professionals improved:** Planned Output-1 will improve the quality of nursing professional by enhancing faculty capacity, expanding specialize training, modernizing curricula, and establishing continuing professional education standards. It will also promote equitable access through digital linkages between the COEs and the province's 44 public nursing colleges.

- **Output-2 — Climate-resilient and gender-sensitive COEs for nursing education established:** The **output 2** will support the construction and operationalization of three climate-resilient **and** energy-efficient COEs in Multan, Lahore, and Rawalpindi, complete with simulation labs, digital learning platforms, and student hostels. These COEs will serve as regional training hubs for undergraduate, postgraduate, and short-term specialized nursing programs.

- **Output-3 — Governance and management for health workforce strengthened:** The output-3 will strengthen governance and management of the nursing workforce by establishing an independent management and quality assurance entity for COEs, integrating nursing education data into the provincial Human Resource and Management Information System (HRMIS), and introducing policy and regulatory reforms to support workforce planning, accountability and private sector participation.

C. Potential IR and IP Risks

3. Only output 2 of the PN&HWRP RBL program will invest in the development of three new state-of-the-art Centers of Excellence (COEs) for nursing education in Lahore, Multan, and Rawalpindi. A centralized design for establishing the COEs will be preferred however, based on the dimensions and area of available land parcels, site-specific adjustment in layout plans of academic and hostel building blocks can be adopted without compromising the COE infrastructure requirements. Acquisition of additional land through expropriation will be strictly avoided and to minimize the IR related impact, the construction activities will be limited within the SHC&MED owned land located in periphery of the exiting tertiary hospital or allocated government land or voluntarily donated individual owned/communal owned land parcels to SHC&MED in close vicinity of the tertiary health care hospital.

4. For preliminary screening and assessing the need for land acquisition and determining potential IR impacts and risks, candidate sites being considered for establishing the COEs were visited and the information about land titles was accessed and reviewed to confirm the land title and pending legacy issues. Key findings and potential IR risks for each COE site are summarized below.

5. **COE site for Lahore.** The Government of Punjab aims to establish a Medical City in Lahore for providing centralized medical facilities, education, and research for addressing growing health care needs of the region and is considering to establish the nursing COE Lahore within the site of the proposed Medical City. The site is within the LDA City which is owned and managed by the Lahore Development Authority (LDA). However, the specific area to be allocated for the Medical City and COE Lahore is not yet finalized. Once, the location and allocated land for the Medical City is confirmed, the selected site for COE will be screened for IR impacts following the RF prepared for the program. Initially, the SHC&MED has identified and earmarked a government owned land parcel available in form of Nawaz Sharif Cancer Research Institute along Pine Avenue, Valencia Town, Lahore that could be a potential site for establishing the COE. Estimated area of said alternate government land parcel is almost 5 acres, that was cultivated by adjoining landowner household before demarcation of household and government owned land at site. After demarcation, the household owned land and government owned land parcels were severed by constructing a boundary wall and cultivation of government land parcel has been abandoned. However, a small structure (room with corrugated steel roof) and compound area (on north western corner of government land parcel) is occupied by an informal user for earning his livelihood through collection and sale of scrapped material. Clearance of the noted structure and restriction on informal land use may result in social risks and IR related impacts. The social risks and perceived IR impacts will have to be further screened and assessed following confirmation of the location of Medical City Lahore, final selection and demarcation of the site and land area allocated for establishing COE as well as based on the designed layout plan for the COE building blocks.

6. **COE site for Multan.** It is planned that the COE of nursing at Multan will be established on the land parcel reserved for medical education university and nursing college within the periphery of Nishter-2 — a tertiary care hospital established on 58 acres of government land transferred and mutated to the SHC&MED. The earmarked land is located within the boundary wall of the Nishtar-2 which is free of encumbrances and available for establishment of COE at site. The review of land record confirmed that the allocated 58 acres of land for Nishtar-2 was previously owned by the forest and wildlife department (40 acres) and the Multan City Government (18 acres). The land was transferred to SHC&MED in 2019 for establishing the Nishter-2 Hospital and medical education facilities. However, the shared land record exhibit

pending mutation cases due to title disputes pending in competent courts. So, further in-depth assessment will be required during detailed design of the COE building and demarcation of land parcel required to establish the COE at site to comprehend the issues associated with demarcated land and conduct IR due diligence accordingly.

7. **COE site for Rawalpindi.** Initially, the SHC&MED reviewed availability of land in multiple medical education institutions and hospitals within and outside its portfolio in Rawalpindi including Rawalpindi Medical University (RMU), Mother and Childcare Hospital (MCH) as well as Rawalpindi Institute of Urology renamed as Punjab Kidney and Liver Transplant Institute-II (PKLI_II). It also coordinated with the District Land Revenue Department for spotting and allocating government owned land parcel in newly urbanized area along Chakari road in outskirts of Rawalpindi city. After considering different alternative sites, the SHC&MED confirmed the Mother Childcare Hospital (Hospital building is almost completed but not operationalized yet due to pending finishing works) as ultimate site for establishing the COE for nursing education at Rawalpindi. The MCH occupies ~12.5 acres of land claimed as government owned land that has been historically used for providing health services to local and regional communities since 1936[12]. The MCH building with all facilities including the Federal TB Center operating as outdoor patient facility is being handed over to the provincial government i.e. the SHC&MED for operationalizing it as Children Hospital. Initially, the SHC&MED has earmarked almost 1.0-acre vacant land available within hospital premises as a car parking area in front of the Federal TB center. Further, regardless the land occupied under TB center is required for COE, it is most likely that the SHC&MED can relocate it in nearby other government hospital with better clinical facilities because the SHC&MED is of the view that the operation of an infectious disease facility within the premises of a Children Hospital is not acceptable under any health standards. So, the land occupied under TB center can also be used for the purpose of constructing COE building blocks once it is relocated to another hospital. The review of available information transpires that the earmarked 1.0-acre land for establishing the nursing COE is encumbrance free, and land title related disputes and legacy issues are unlikely. However, there may be a potential risk of interrupted health service delivery in case separate access to the Federal TB center is not ensured, or it is relocated elsewhere haphazardly without providing required space in any other hospital in a timely manner. So, likely social risks from interruption of health service delivery due to interrupted access to the TB center or from its relocation will have to be reviewed in detail during design of the COEs.

8. Nevertheless, reported land at sites selected or being considered for establishing the COEs is either owned by the SHC&MED or any other government entity, so the risk for expropriation of land for establishing the COEs is negligible. However, the risk of involuntary restriction on access and third-party uses of government owned land cannot be disregarded for the site likely to be selected within or outside the premises of the existing tertiary care hospitals or medical education facilities. Based on perceived risk for involuntary land acquisition and/or involuntary restriction on access or third-party land uses, it is likely that the ADB's IR policy requirements can be triggered. The Indigenous People (IPs) as defined in the ADB's safeguards policy statement (SPS 2009) are not found in the Punjab, so there is no risk for triggering the IP policy principles and IP safeguard requirement.

[12] A 50-bed hospital for tuberculosis patients (TB hospital) was constructed at site in 1936 for both outdoor patients and in-house patients. The old building of the TB hospital was cleared in 2008 for construction of MCH and a new single-story building was constructed and handed over to federal health ministry for operationalizing Federal TB Center exclusively for outdoor patients only.

D. Resettlement Framework for the RBL program

9. For overall categorization of the RBL program for Punjab Nursing and Health Workforce Reforms, the social safeguards risk assessment is relied on the reviewed information and stakeholder's consultation carried out during site visits and mission meetings. Keeping in view the likely risk of land acquisition and IR related potentially less significant impacts that could be related to pending legacy issues, restricted access or established third-party land use on reserved public land for establishment of health facility or the land owned by SHC & MED that is allotted and occupied by the existing health facilities including the hospitals and medical education facilities. Therefore, the RBL program for PN&HWR has been **tentatively categorized as "B" for IR impacts** as a precautionary measure. The program is designed for the Punjab Province in which the indigenous people and/or tribal groups having distinct indigenous culture, language and attachment to distinct habitat and/or having socioeconomic, political and administrative institutions different from mainstream population are not found. So, the program has been **categorized as "C" for IP impacts**.

10. Whereas for continued screening and detailed assessment of the IR impacts and risks that could be likely from execution of program interventions particularly under the output- this Resettlement Framework is prepared as part of the PSSA for the PN&HWR – RBL Program. It defines the legal and policy framework, IR screening and assessment principles, eligibility criteria, and entitlements for affected people. It is aimed at ensuring fair and timely compensation on replacement cost basis, resettlement and rehabilitation provisions and income restoration measures for physically and economically displaced persons. It sets out procedures for subproject screening, social impact assessment, consultation, participation and disclosure, grievance redress, monitoring and reporting systems, etc. and explains the institutional and financial arrangements for social safeguards.

11. This RF is an integral part of the program that will steer the EA and IA to fulfill ADB's SPS 2009 requirements pertaining to IR safeguards and complies with Pakistan's Land Acquisition Act of 1894, and provincial rules, regulations and guidelines for land acquisition and resettlement. This RF will be agreed by the government of Punjab and followed by the Executing Agency (SHC & MED) and the Implementing Agency (PMU established under SHC & MED) to comply the IR related Social Safeguards requirements of ADB during execution of the PN&HWR – RBL Program.

II. LEGAL AND POLICY FRAMEWORK

A. IR Legal and Policy Framework

12. This RF has been prepared considering Pakistan's laws relevant to land acquisition and resettlement and ADB's SPS 2009 for IR and indigenous peoples (IPs). To resolve any gaps between the two sets of instruments, i.e. Pakistan's LAA 1894 and ADB's SPS 2009, the framework provides measures to reconcile and address the gaps in a manner consistent with SPS 2009's compliance requirements.

B. Land Acquisition Act 1894 (LAA 1894) with successive amendments

13. In Pakistan, the LAA 1894 with its successive province specific amendments governs land acquisition. The LAA regulates the land acquisition process and enables the federal and provincial governments to acquire private land for public purposes through the exercise of the right of eminent domain. Land acquisition is a provincial government's responsibility and if the land acquisition emerged for the project, Land Acquisition Act 1894 with its successive amendment by Punjab government and the Punjab Land Acquisition Rules of 1983 will apply. The LAA and Rule made thereunder lays down definite procedures for acquiring private land for projects and payment of compensation. For entering private land or carrying out surveys and investigations, specified formalities have to be observed and notifications to be issued. The compensation cost for land and assets is assessed by the District Price Assessment Committee (DPAC) according to the section 23 parameters based on review of land transactions record (for one year prior to publication of section 4 notification), yearly published land/asset valuation tables and prevailing market rates reported by the field land revenue staff. Damage to any crops during survey and investigations has to be compensated, and the Land Acquisition Collector (LAC) award compensation for acquired land/assets following BOR's approval of the DPAC assessed compensation cost. The displaced persons, if not satisfied, can go to the Court of Law to contest the compensation award of the Land Acquisition Collector (LAC).

14. The Law deals with matters related to the acquisition/ or temporary occupation of private land and other immovable assets that may exist on it when the land is required for public purposes. The right to acquire land for public purposes is established when section 4 of the LAA is triggered. The LAA specifies a systematic approach for acquisition and compensation of land and other properties for development projects. It stipulates various sections pertaining to notifications, surveys, acquisition, compensation and apportionment of awards, along with disputes resolution, penalties, and exemptions. The surveys of land acquisition are to be disclosed to the displaced persons. However, the law only recognizes "legal" owners of property supported by records of ownership such as land record title, registered sale deeds, or agreements. The salient features of the Pakistan Land Acquisition Act 1894 are summarized in table attached as Appendix I.

C. ADB's Safeguard Policy Statement 2009

15. SPS 2009 defines affected persons as those who are physically displaced (relocation, loss of residential land, or loss of shelter) and/or economically displaced (loss of land, assets, access to assets, income sources, or means of livelihoods) due to (i) involuntary acquisition of land, or (ii) involuntary restrictions on access and third-party use of land and resources or on access to legally designated parks and protected areas.

16. SPS 2009 covers losses whether such losses and/or involuntary restrictions are full or partial, permanent or temporary. Under SPS, resettlement is considered involuntary when the displaced persons have no right to refuse the land acquisition by the state that results in their displacement. This occurs when land is acquired through (i) expropriation by invoking the eminent domain power of the state, or (ii) land is acquired through negotiated settlement when the pricing is negotiated in a process where expropriation will be the consequence of a failure in the negotiation. As per SPS provisions the legal title of affected is no bar to compensation, rather it applies to (i) persons with formal legal rights to land and/or structures lost entirely or in part, (ii) persons who have no formal legal rights to land and/or structures lost wholly or in part but who have claims to such lands that are recognized or recognizable under national law, and (iii) persons who lost the land they occupy in entirety or in part who have neither formal legal rights nor recognized or recognizable claims to such land. However, compensation varies according to the type of impact and displacement encountered by the affected person. The SPS sets out the 12 basic principles attached as Appendix-II to be delivered in the area of involuntary resettlement.

D. Comparison of Key LAA and ADB Policy Principles and Practices

17. The Pakistan LAA 1894, with successive amendments by Punjab and ADB SPS 2009 diverge on some key points.[13] The key ADB Policy Principles are (i) the need to screen the project early on in the planning stage, (ii) carry out meaningful consultation, (iii) at the minimum restore livelihood levels to what they were before the project, improve the livelihoods of displaced vulnerable groups (iv) prompt compensation at full replacement cost is to be paid, prior to displacement and prior to impact (v) provide affected persons with adequate assistance, (vi) ensure that affected persons who have no statutory rights to the land that they are working are eligible for resettlement assistance and compensation for the loss of non-land assets and (vii) disclose all reports.

18. The LAA 1894 in contrast to ADB SPS does not require adequate consultation with affected parties; it simply requires publication of the declarations about land acquisition including the purpose for which it is required under different sections and issuance of notices to interested parties for inquiry of objections and compensation claims. Nor does the law require consultations with affected persons, documenting the process and preparation of a “land acquisition plan” with explanation on compensation eligibility, entitlements and payment timelines. The LAA bars compensation entitlement for affected persons without formal legal title or legally constituted agreements and does not provide compensation for income losses inflicted by acquisition of land and assets. Table 1 summarizes the differences between the LAA and ADB safeguards and the measures to address these.

Table 1: Comparison of LAA 1894 and ADB SPS 2009 with Gap Bridging Measures

Pakistan LAA 1894 with successive Punjab d Amendments	ADB SPS 2009	Measures to Address the Gap
Compensation for land and other assets is based on average values and department unit rates that do not ensure replacement market value of the property acquired. However, LAA requires that a 15% compulsory acquisition surcharge supplement to the assessed compensation.	affected persons are to be compensated for all their losses at replacement cost, including transaction cost and other related expenses, without deducting depreciation.	The valuation for the acquired land, structures and other assets will be based on full replacement costs keeping in view the fair market values, transaction costs and other applicable payments that may be required, without deducting for depreciation of structures. A 15% compulsory

[13] ADB Safeguard Policy Statement, July 2009.

		acquisition surcharge will be added to the compensation. The EA/IA will closely coordinate with the BOR on the valuation process to ensure that the RF provisions for determining compensation amounts are observed.
No provision for resettlement expenses, income/livelihood rehabilitation measures or allowances for displaced poor and vulnerable groups.	Requires support for rehabilitation of income and livelihood, with focus on those with severe losses, poor and vulnerable groups.	Additional assistance will be provided to cover resettlement expenses (transportation and transitional allowances), loss of income, and provide support to vulnerable persons and those severely impacted (considered to be those losing more than 10% of their productive assets).
Lack of formal title or the absence of legally constituted agreements is a bar to compensation/ rehabilitation. (Squatters and informal tenants/leaseholders are not entitled to compensation for loss of structures, crops).	Lack of formal title is not a bar to compensation and rehabilitation. All affected persons, including non-titled affected persons, are eligible for compensation of all non-land assets.	Squatters, informal tenants/leaseholders are entitled to compensation for loss of structures and livelihood and for relocation.
Has no specific requirement for the preparation of a RP	Requires the preparation of a RP based on social impact assessment and consultation with affected persons elaborating on displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, budget, and time-bound implementation schedule.	Draft RPs based on preliminary design, and final RPs based on detailed design will be prepared for subprojects that involve IR issues.
There are emergency provisions in the procedure that allow civil works to proceed before compensation is paid.	Requires that affected persons are compensated and provided with other resettlement entitlements before physical or economic displacement.	Civil works may only proceed after the resettlement plan is implemented, and compensation for loss of assets and other allowances are fully paid.
No convenient grievance redress mechanism except recourse of appeal to formal administrative jurisdiction or the court of law	Requires the establishment of accessible grievance redress mechanisms to receive and facilitate the resolution of affected persons' concerns about displacement and other impacts, including compensation	EA/IA will establish an easily accessible grievance redress mechanism available throughout project implementation that will be widely publicized within the respective subproject area and amongst the affected persons.
There is no requirement for monitoring resettlement implementation and disclosure of resettlement plans and monitoring reports	Requires that RP implementation is monitored, and RP and monitoring reports are disclosed in an accessible place and a form and language(s) understandable to APs and other stakeholders.	RP implementation will be monitored both internally and externally. The draft and final RPs, and monitoring reports will be disclosed to affected persons, posted in the EA/IA and ADB website for public disclosure.
There is no requirement for meaningful consultation with affected parties; LAA requires that declaration and notice be given about land acquisition or occupation for temporary uses and the purposes for which it is required	Requires meaningful consultations with affected persons and host communities, to inform all displaced persons of their entitlements and resettlement options.	Affected parties will be consulted in a meaningful manner, in accordance with the requirements of SPS, as part of the project design and implementation process; information on entitlements and options will be provided and affected persons will also be consulted during monitoring.

Source:

E. Remedial Measures to Bridge the Gaps

19. To reconcile Pakistan's legal and regulatory system for involuntary land acquisition (LAA 1894) and ADB's IR Safeguards as in SPS 2009, and address the gaps between the two systems, the following principles will be adopted for the PN&HWR – RBL program.

1) IR Screening and Categorization Principles

20. The ADBs SPS 2009 provides a systematic approach to screen and categorize programs and projects based on the significance level of IR impacts of the program and/or project or any of its components. The IR impacts are considered significant if 200 or more affected people will experience major impacts either due to involuntary acquisition of land and assets or from restriction on access to land use and/or legally designated parks and areas. The major impacts are defined as (i) being physically displaced from housing, or (ii) or losing 10% or more of their productive assets (income generating). Whereas the defined significant adverse impacts as of RBL policy include the impacts that are sensitive[14], diverse[15] in nature and unprecedented.[16]

21. The involuntary resettlement category of program is determined by a most sensitive activity in a program not by the aggregation of impacts of all program activities that may involve involuntary acquisition of land/asset and /or restriction on access to use of land/asset for execution of program interventions. Accordingly, the screening and categorization criteria below will be followed to determine the school sites eligible for program interventions and to carry out subsequent safeguards impacts assessment and due diligence activities, preparation and implementation of resettlement planning documents.

- **Category A.** A program or any of its components will be classified as category A for IR safeguards if it is likely to have significant involuntary resettlement impacts as defined in para. 19 above. Under RBL policy, the program/project activities involving significant impacts on the affected people are not considered eligible under RBL program. So, the COE sites involving significant IR impacts will be excluded and/or replaced with an appropriate site with less significant or no IR impacts.

- **Category B.** A program will be classified as category B for IR if any of its component/activity includes involuntary resettlement impacts that are not deemed significant. The selected school sites involving insignificant IR impacts are eligible for program interventions. However, those will be subject to detailed assessment of IR impacts, preparation and implementation of resettlement plan (RP) to compensate the affected people for their lost assets and income sources either due to involuntary acquisition of land/assets or from imposed restriction on access and use of the land and assets. For impacts screening and assessment, determining eligibility and entitlement for compensation, preparation and implementation of RP, the provisions and procedures outlined in the subsequent section 3 and below of this RF will be followed.

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14 **"Sensitive"** means the impacts which could have a major bearing on the affected people, causes serious/irreversible damage or require special attention.

15 **"Diverse"** means the impacts that are multidimensional and multi types in nature like loss of land, shelter, crops and livelihood sources leading to physical and economical displacement on the different groups of the affected people including land less, non-titled, seasonal workers and other vulnerable groups etc.

16 **"Unprecedented"** means that the impacts of a type, nature or scale which is not common and occur very rarely or where little is known and understood about the likelihood and nature of the impact for which mitigations are not readily available and/or neither were reviewed nor tested in context of the program/project.

- **Category C.** A program is classified as category C for IR safeguards if none of its component or activity has the IR impacts. No further assessment of involuntary resettlement impacts will be required. However, IR screening check lists will be prepared and delivered by the EA/IA before commencing the execution of designed interventions for identified eligible school sites.

22. All selected and confirmed sites listed for establishment of COEs for nursing education under output-2 of the program will be subject to screening and assessment of potential IR impacts and risks that could be likely from construction and establishment of state-of-the art COE for nursing education and students hostel building blocks under the PN&HWR – RBL Program. For IR screening of the selected sites eligible for program interventions, the following key IR impact screening and assessment parameters will apply.

i. Pre-structured IR screening check lists included as Appendix III of this RF will be used for IR screening and IR impact assessment to determine the COE sites eligible for program interventions. Duly filled screening check lists confirming potential IR impacts endorsed by the IA/EA will be maintained.
ii. The IR screening and categorization criteria explained above will be followed for final selection of school sites eligible for designed interventions under the RBL Program.
iii. The COE sites involving involuntary acquisition of land and assets under LAA 1894 and those with pending legacy issues and/or title disputes will be excluded. However, if needed the community can be mobilized for contributing land through voluntary donation to avoid involuntary land acquisition.
iv. The candidate sites involving acquisition of land through expropriation, pending legacy issues i.e. disputes on land title or pending litigation about previous acquisition will be avoided to ensure smooth and timely implementation of the program.
v. The sites involving no IR impacts or less significant IR impacts will be finalized by the EA/IA for program intervention and those will be shared with ADB project team for review and acceptance prior to commencement of tranche payments to the extent of the sites with no IR impacts (IR category C sites) upon satisfactory achievement of agreed DLIs.
vi. The screened IR category B COE site with identified insignificant IR impacts and IR Category C COE sites (no IR impacts) will be grouped separately.
vii. In case of IR category B COE sites, a detailed assessment of IR impacts, census and socioeconomic assessment of the affected households/people. All such sites will require preparation of a Resettlement Plan (RP) as outlined in ADB's SPS 2009 which is included as Appendix-IV of this RF. Whereas in case of IR category C projects, IA/EA endorsed IR screening check lists will be prepared and shared with ADB project team for confirming no IR impacts.
viii. The EA/IA will ensure to avoid any construction activity in the COE sites classified as IR Category B sites and tranche payments for agreed DLIs will not be released until EA/IA endorsed and ADB-accepted RP is fully implemented. Whereas the selected COE sites with no IR impacts (IR category C Sites) will be open for commencement of designed works and tranche payments upon satisfactory achievement of agreed DLIs.

2) Involuntary Acquisition of Land and Voluntary Land Donation Principle

23. The involuntary resettlement safeguards of SPS cover both physical and economic displacement because of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas. The land acquisition is considered involuntary when affected people have no right to refuse the land acquisition by the

state that result in their physical or economic displacement. Whereas the restriction on land use or on access to legally designated parks and protected areas mean the imposition of involuntary restrictions on the use of resources on people who live around or within such areas. This occurs when land is acquired through (i) expropriation by invoking the eminent domain power of the state, or (ii) land is acquired through negotiated settlement when the pricing is negotiated in a process where expropriation will be the consequence of a failure in the negotiation. The ADB's IR policy principles will be triggered.

24. In case of identified need for involuntary land acquisition, it will be ensured that the school sites involving land acquisition through expropriation with significant IR impacts should be excluded from program interventions. Whereas, for the COE sites involving insignificant IR impacts from involuntary land acquisition and/or from involuntary restriction of land uses will require detailed impacts assessment and preparation of resettlement plans following the provision outlined under sub-heading 3 and below,

25. On the other hand, voluntary donation of land refers to the resettlement not attributable to eminent domain or other forms of land acquisition backed by powers of the state. The important principles in voluntary land donation and resettlement are informed consent[17], power of choice[18] and willful contribution by the beneficiary community or the individual household for implementation of a program/project. The SPS Safeguards Policy principles do not apply to voluntary land donation and/or voluntary restriction of land uses. Therefore, for the PN&HWR – RBL Program, voluntary land donation will be preferred to avoid compulsory acquisition of land under the LAA 1894. The criteria below will be strictly adhered to conclude voluntary land donation if so, needed for any of the selected candidate COE sites.

- The voluntary land donation transaction will be conducted in an open and transparent manner, with timely and complete information provided to program-affected people for ensuring their informed choice.
- The terms of the transaction will ensure that the program-affected people are benefiting from the transaction and will receive fair value in exchange for the rights being voluntarily relinquished.
- Program-affected people will have the right to refuse the land acquisition and/or land use restriction, and they will be allowed full opportunity to effectively exercise that right.
- The threats of expropriation or other compulsory procedure, coercion, intimidation, bribery, or undue influence will not be exercised to influence the decision of the program-affected persons.
- The amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's current livelihood levels, and such land donation will not involve physical displacement. Program-affected people will not be rendered disadvantaged or vulnerable as a result of voluntary transfer of their land rights and it will be ensured that no land donations are taken from the vulnerable persons and/or communities/groups.
- For communal or collective land, it will be ensured that the donation is made with the consent of all individuals having land use rights.

[17] "Informed consent" means that the person involved is fully knowledgeable about the project and its implications and consequences and freely agree to participate

[18] Power of choice means that the person involved has the option to agree or disagree, without adverse consequences being imposed formally or informally by the state. Power of choice is only possible if project location is not fixed.

- The consultations for land donation and consensus statements/agreements will be documented and witnessed by the village headman or the recorded landowner/s from the village to facilitate mutation of title for donated land parcels in land holding record registers.
- In case of voluntary land donation and/or voluntary restriction on access and use of communal land, it is understood that the land donor household and//or community facing voluntary restriction on land use are waiving their right to compensate for lost assets and/or access.

26. In case of voluntary land donation, program-affected people will not be required to vacate land or relinquish land rights until land donation transaction is completed according to prescribed criteria and/or donated land is mutated in the name of the candidate COE for nursing education or the SHC&MED. The IA will maintain auditable quality record of all consultations and agreements arrived among land donor community/households and the representing officers from EA/IA. Nonetheless, incase, the third-party land users are spotted on voluntary donated land, then the IR assessment and planning requirements outlined under sub-heading 3 and below will apply to the extent of identified third-party land users.

3) IR Assessment and Planning Principles

27. For selected COE sites eligible for program interventions, site-specific design modifications will be reviewed and considered to avoid, minimize or mitigate likely IR impacts for each COE. It will be preferred to replace the COE sites involving land acquisition through expropriation under LAA 1894 and having land title disputes or pending legacy issues with alternate sites free of such encumbrances for avoiding and minimizing the IR impacts. In case, avoidance through replacement of school sites is not possible then efforts will be ensured to minimize and mitigate the IR impacts by exploring and incorporating site-specific design adjustments and other plausible measures for resolving the legacy issues. The listed school sites involving IR impacts will require a comprehensive assessment of IR impacts including (i) detailed measurement and valuation (on replacement cost) of affected assets, (ii) census and socioeconomic assessment of all affected households/affected people owning/occupying affected assets, (iii) determination of eligibility criteria and compensation entitlements for lost assets/resources (on replacement cost) and applicable allowances for resettlement/rehabilitation and income/livelihood restoration of the APs. Accordingly, consolidated RPs covering all school sites involving IR impacts in each district will be prepared and implemented prior to commencement of tranche payments as per achieved DLIs. Planning, preparation and implementation of RPs will follow principles below:

(i) Meaningful consultations will be carried out throughout project processing, design and implementation/monitoring phases and the affected people including other stakeholders will be consulted and informed as well as given an opportunity to participate in IR planning and implementation activities.
(ii) The acquisition of land under LAA 1894 will be excluded and in case land is required for any of the selected site for COE, the local community will be mobilized to contribute required land through voluntary donation for implementation of the program interventions. Such land donation proceedings will be documented and mutation of land title in the name of COE nursing education or the SHC& MED will be ensured before including the subject school site in the finalized list of schools eligible for program interventions in each district.
(iii) Each RP duly endorsed by EA/IA and cleared by ADB will be disclosed on the websites of the EA/IA and the ADB. Hard copies including translated copies (in

language understandable to local community) will be placed at EA/IA office and other accessible places in or near project schools' site and surrounding area.

(iv) The RP or RP/IP provisions, particularly those on impact assessment and valuation, eligibility and entitlements, compensation delivery and grievance redress mechanisms will be disclosed to the affected people by EA/IA through disseminating information brochures, placing/installing information boards/banners at conspicuous places near and around school locations and surrounding villages.

(v) A project-based GRM with representation of all stakeholders will be established at the time of project inception and will be kept intact and functional throughout project implementation period to address the social issues related to project design, resettlement planning and implementation, restriction of access to resources and basic amenities during construction and any other social matter that arises during implementation of the project. Concerns on land title, land compensation assessment and apportionment issues/disputes etc. will be addressed following the GRM procedures provided under LAA 1894.

(vi) Compensation eligibility will be limited to the cut-off date announced by EA/IA. Since acquisition of land under LAA 1894 is unlikely, so the perceived IR impacts may be confined to compensate formal and informal land use rights not covered under LAA 1894 provisions. In this case, cut-off date will be established and declared as the day of commencement or completion of social impacts assessment survey and census of affected persons. The process for announcement of cut-off date will be fully documented with record maintained to avoid any superfluous claims by ineligible APs entering the project after announcement of cut-off date.

(vii) Lack of legal title will not be a bar to compensation under the program all titled and non-titled affected persons occupying required land and land-based assets on or before the cut-off date will be eligible for compensation, relocation and rehabilitation measures, as applicable. and regardless of nature and type of impacts (permanent or temporary, full or partial) affected persons without legally recognizable claims to land will be eligible for compensation to the extent of affected assets other than land as well as relocation and rehabilitation support under RP provisions and entitlements.

(viii) Compensation of structures will be at full replacement value, either through the replacement structures[19] of equivalent or higher value and quality or through cash compensation at replacement cost.[20] Depreciation will not be considered in the compensation for structures and affected persons will be allowed to collect salvaged material. It will be ensured that affected persons are not displaced physically or economically before payment of compensation and other entitlements for their lost assets and income and livelihood restoration program is in place.

(ix) Incomes and livelihood sources lost, including but not restricted to crops and trees or interruption of business activities and employment, will be fully compensated at replacement cost. Affected persons who are permanently losing incomes and livelihood sources as well as poor and vulnerable affected persons will be entitled to income restoration measures like credit facilities, training and employment assistance to maintain or improve their livelihoods.

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[19] For replacement structures all transaction costs will be paid by the project or included in compensation payments to the APs.

[20] Full replacement cost involves fair market value, transaction costs, interest accrued, transitional and restoration costs and other applicable payments without depreciation.

(i) Any lost civic infrastructure and community services will be either restored at site or established at a replacement land prior to commencement of civil works for the subproject.
(ii) APs that need to relocate will be entitled for compensation for lost housing at full replacement cost, relocation assistance and transitional support for establishing their residential structures at places of their choice.
(iii) The RP implementation progress and effectiveness of the implementation of each subproject RP including livelihood restoration measures put in place for affected persons will be monitored and RP implementation and social monitoring reports will be compiled and shared with ADB in a manner as explained in the EA/IA endorsed and ADB-accepted RP.

4) Specific Provisions for Disadvantaged or Vulnerable Households and APs

28. One of the SPS 2009 requirements on IR is to improve the standards of living of the displaced poor and other vulnerable groups who may experience adverse impacts disadvantageously from project because of their disadvantaged/vulnerable status. Typically, those below poverty line, the landless or those without a title to land, the elderly, female headed households, women and children, and IPs comprise the disadvantaged or vulnerable groups within a project's displaced population.

29. **Vulnerable AHs.** To identify households, the following vulnerability indicators have been established for census and socioeconomic assessment for RP under PN&HWR-RBL program. Displaced households that exhibit one or more of the conditions below will be considered vulnerable:

(i) AHs with income equal to or below officially designated national poverty line;
(ii) Landless or those without legal or legally recognizable title to the acquired land from which their livelihood depends on;
(iii) DHs with or without children that are headed by a disabled person, elderly or woman; and/or
(iv) IPs or ethnic minorities with their fragile socioeconomic structure vulnerable to disproportionate impact from project activities.

30. Vulnerable households with specific impacts on their livelihood due to lost assets will be identified during the census and socioeconomic survey for each COE site and will be indicated in the respective RP. Such households will be consulted on measures to safeguard against impoverishment and accordingly livelihood and income restoration measures for rehabilitation and enhancement of their livelihood will be provided in the respective RPs and ensured during execution of the subproject.

31. **Provisions for displaced women.** Acquisition of household assets and restriction of accesses to resources can impact the women disproportionately due to their fragile socioeconomic status and it could be difficult for them to re-establish their socioeconomic activities at alternate sites because of restricted mobility or poor literacy rates. To safeguards women needs and interests, following measures will be considered during impact assessment, census of affected persons, designing rehabilitation/resettlement provisions and preparation of the RPs under PN&HWR-RBL program.

(x) Gender segregated socioeconomic baseline and impact inventory linked to the entitled affected persons will be developed and women shall be compensated for assets occupied

by them or in their name. Female headed households will be considered as vulnerable and are entitled for additional assistance for vulnerable households.

(xi) During census and socioeconomic assessment, meaningful consultations will be conducted with displaced women through focus group discussion and individual meetings to identify the concerns and mitigation required in resettlement planning and accordingly the RPs will detail the scope of IR impact on women and wherever required separate gender action plan will be developed.

(i) The resettlement entitlements and compensation package against lost household assets will include findings of the consultative meetings and focus group discussions with women affected persons during RP planning and implementation.

(xii) In case of compensation for household assets, efforts will be ensured to pay compensation in the joint accounts of the spouses (if possible) and in case of provision of replacement asset, i.e., land or structure (residential/commercial), it will be ensured that the provided asset is transferred in the joint ownership of the male and female counterparts of the AHs; and

(xiii) Gender-sensitive GRM with women participation will be ensured to facilitate the aggrieved women (if any) to lodge complaints and get their concerns resolved.

32. **Indigenous Peoples.** IP safeguards requirements as defined in the SPS 2009 are triggered when the projects (direct or indirect) impacts are identified on the assets or resources of some distinct group of people or tribe with their socioeconomic, cultural, administrative and legal institutions different from the mainstream population or if territories or natural or cultural resources that distinct tribal group/community own, use occupy, or claim as an ancestral domain or asset are affected by the subproject. There are no socio-cultural groups in the project area that may be considered as IP communities. Therefore, IP safeguards under the ADB's SPS 2009 will not be triggered for the project.

33. Nevertheless, if IPs are identified at any project school sites when selection and design for all target schools is completed or during execution of the project, EA/IA will engage qualified and experienced experts to carry out a gender-sensitive social impact assessment (best suited and culturally appropriate) to determine the project impacts on the IPs. And if impacts on IPs are documented, EA/IA will explore all possible project design options to avoid the physical and economic displacement of IPs and in cases where avoidance of impacts is not possible the EA/IA will follow ADB's IPs policy and procedures to prepare a combined RP and IPP for the subproject having impacts on IPs. The combined RP and IPP will explain the means and procedures adopted to address the needs of IPs and the compensation provided to offset the project adverse impacts. During execution of the civil works, it will be ensured that IPs' dignity, indigenous knowledge, cultural and social value are fully respected and preserved.

5) Provisions for Public Infrastructure and Community Resource

34. In case the impacts are noted on the existing public infrastructure (Federal TB Hospital) or community resources, following measures will be ensured to determine the nature and quantum of impact, restore the facility on alternate location and ensure un-interrupted access and delivery of service to the benefiting community.

(i) The potential IR impacts likely from dismantling and dislocation of the public infrastructure and community resource will be screened and assessed in detail.

(ii) Meaning full consultation will be conducted with key stakeholders including, operators, employees and the community benefiting from the affected health facility or public infrastructure and community resource.

(xiv) The alternate hospital sites having potential for relocating the affected health facility will be identified and assessed keeping in view the space required for operation of the facility without compromising the quality and quantum of services that was offered through the facility being abandoned.
(xv) In case the existing building of host public infrastructure lacks adequate space, then the measures including costs needed for construction of new building or additional rooms/halls with existing building of host facility will be determined.
(xvi) A timeline for relocating the facility will be worked out and agreed to ensure un-interrupted service delivery, existing facility will be kept intact until the alternate location is operationalized fully.
(xvii) A social safeguards due diligence report covering assessment social and IR impacts likely from abandoning the existing facility and its relocation to alternate site, consultation findings, adopted measures with suggested time lines for relocating the facility and actions ensured for continued un-interrupted service will be prepared and endorsed by the IA/EA for review and concurrence by the ADB project team prior to starting an activity related to relocation of noted public infrastructure and community resource.

6) Compensation Eligibility and Entitlement

35. **Cut-off date.** The eligibility for compensation will be limited to the government announced cut-off date for each selected COE site that involved IR impacts. The cut-off date shall be set and announced by the government during planning and preparation of RP to prevent influx of outsiders and to avoid false and frivolous claims for compensation, relocation and livelihood rehabilitation during RP implementation and execution of construction works. For impacted private asset or third-party land use rights on selected project school sites, the date of completion of social impact assessment and census survey of affected persons in will be the cut-off date for compensation under provisions of this RF. Any person who enters and occupies the project land or any assets established therein after cut-off date will not be eligible for compensation however, the APs will be served a prior notice to vacate the project site and remove their assets. They will be allowed to take their salvaged materials free of cost.

1. The EA/IA will establish and notify a cut-off date for each district separately to facilitate RP planning, preparation, implementation and monitoring. The cut-off date will be disclosed to the affected persons through formal and informal means including publicizing through local newspapers, consultative meetings, focus group discussions, field surveys and other informal means of communication i.e. face-to-face communication with affected persons and communities. The disclosure process of cut-off-date will be formalized through documentation of consultation meetings and issuing disclosure reports.

7) Compensation Entitlements

36. In the context of IR and IP safeguard requirements, affected persons entitled to compensation under RP include those who face loss of their assets and are displaced physically (relocation, loss of residential land, or loss of shelter) and/or economically (loss of land, assets, access to assets, income sources, or means of livelihoods) as a result of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas. Accordingly under the provisions of this RF, the persons who hold/occupy an assets and have third-party land use rights at project school sites on or before cut-off date and who will be subject to face temporary or permanent loss (full or partial) of their assets including structures (residential, commercial or other), crops/trees and improvement (if any) made to land

or will face interruption of land use rights due to clearance of project school site will be eligible and entitled for compensation and rehabilitation/income restoration provisions as summarized in text below and entitlement matrix (Table-2) under the provisions of this RF.

37. Since land acquisition will not be involved and the project impact may be limited to clearing of above land assets (if any) established on selected COE sites, hence the eligible affected persons entitled for compensation under this RF may include but not limited to the categories defined below:

- Affected persons having formal or informal but legally recognizable land use rights under national laws or customs will be eligible for compensation against their affected assets located on government land required for project purposes. Such affected persons may include people who have customary usufruct right to the state land or people who have inherited, occupied, and utilized the land for generations but lack titles simply because the state has not formalized the land records and issued title to them.
- Affected persons without formal legal rights or recognizable claims under national law and customs may include all squatters, tenants, sharecroppers, and wage labourers. Although such affected persons lack legal or recognizable rights to the asset they occupy at the time of cut-of-date but because of lost assets or impacted livelihoods they will be considered affected persons eligible to receive compensation for assets other than land and resettlement assistance.
- Cultivators or those whose livelihood is dependent on acquired assets, business operators of affected commercial structures and their employees whether registered under law or informal, and the identified vulnerable groups.

38. Compensation will be based on the category of affected person and type of loss with compensation eligibility and entitlement limited to cut-of-date. The entitlement matrix developed based on the project policy and relevant provisions of the LAA 1894 is presented in Table 2 below. The entitlement provisions with mechanics to calculate the unit rates or amount of allowances for entitlement in each category is explained in the EM and during RP preparation the compensation amount for each impact type can be finalized in consultation with affected persons and relevant stakeholder to reflect the actual situation at the time of implementation. Nonetheless, the entitlement provisions and compensation unit rates in RPs will not be lower than the provisions explained in the entitlement matrix below.

Table 2: Eligibility and Entitlement Matrix

Type of Loss	Specification	Eligibility	Entitlements
1. Land			
Permanent impact on land.	All land losses independently from impact severity.	Owner (titleholder, or holder of traditional rights) *{In case of voluntary donation of land conditions outlined in para. 22 will apply.}*	• Land for land compensation through provision of plots of equal value and productivity as that of lost, or • Cash compensation at full replacement cost (RC[21]) either through negotiated settlement between the SED and the land owners or settled through independent land valuation study and assessed following outlined provisions in section 23 of LAA including fair market value plus damages/costs applicable free from taxes and levies plus 15% compulsory land acquisition surcharge (CLAS) from

[21]Refer to IR safeguards as in SR2 para. 10 of SPS 2009

Type of Loss	Specification	Eligibility	Entitlements
			publication date of section-4 to the date of compensation.
		Leaseholder titled/untitled *{It may apply for expropriation and/or voluntary donation of land.}*	• No compensation for land. • Compensation commensurate to lease type and as appropriate for recovery of paid advance or paid lease amount for the remaining lease period but up to two years' maximum. • Compensation on replacement costs for all improvements and/or above land assets developed by the leaseholder
		Encroacher. *{It may apply for expropriation and/or voluntary donation of land.}*	• No compensation for land loss • Income rehabilitation allowance in cash equal to net annual income from lost productive assets including crops (if any) due to acquisition of land for public purpose project.
2. STRUCTURES			
Residential, agricultural, commercial,	Partial Loss of structure	Owner (including non-titled land user, squatters or encroachers)	• Cash compensation for affected structure (considering functioning viability of remaining portion of partially affected structure) for its restoration to original use at full replacement cost computed at market rate for materials, labor, transport and other incidental costs, without deduction of depreciation. • Right to salvage materials from lost structure;
		Lessee, tenant	• Cash refund at rate of rental fee proportionate to size of lost part of structure for remaining lease period and compensation for extensions/improvements (if any) made by lessee/tenant to lost part of structure at full replacement cost.
	Full loss of structure and relocation	Owner (including non-titled land user, squatters or encroachers)	• Cash compensation at full replacement cost, including all transaction costs, such as applicable fees and taxes, without deduction of depreciation for age, for self-relocation and right to salvage material of the affected structure; and • Severe impact allowance for lost structure to owners facing full loss to their residential or commercial structure or any productive asset.
		Lessee, tenant	• Cash refund at rate of rental fee proportionate to duration of remaining lease period; and • Compensation at full replacement cost for any improvements made to lost structure by lessee/ tenant.
	Moving of minor structures, (stalls kiosks fences, sheds, etc.)	Owner, lessee, tenant and non-titled land users	• Cash compensation for relocation of structure at market rate (labor, materials, transport and other incidental costs, as required, without deduction of depreciation for age) Or • Relocation of the structure by the Project.
3. CROPS AND TREES			
Crops and Trees	Affected crops	Cultivators including titled and non-titled land users	• Cash compensation (one year crop) at current market rate proportionate to size of lost plot, based on crop type and highest average yield over past 3 years or as assessed through the respective Agricultural Departments.

Type of Loss	Specification	Eligibility	Entitlements
		Parties to sharecrop arrangement	• Same as above and distributed between landowner and cultivators according to legally stipulated or traditionally/informally agreed share in crop produce.
	Affected Fruit and non-fruit trees	Cultivator including titled and non-titled land users	• Cash compensation for fruit trees at current market rate of crop type and average yield (i) multiplied, for immature non-bearing trees, by the years required to grow tree to productivity or (ii) multiplied, for mature crop bearing trees, by the average years of crops forgone; plus, cost of purchase of seedlings and required inputs to replace trees. • Cash compensation for timber trees at current market rate of timber value of species at current volume, plus cost of purchase of seedlings and required inputs to replace trees.
4. RESETTLEMENT & RELOCATION ASSISTANCE			
Relocation Assistance	All types of structures affected	All APs titled/untitled requiring to relocate as a result of losing land and structures	• If affected persons are required to relocate to project relocation sites, they will be provided with secure tenure to the replacement land and structures and access to civic amenities including electricity, water supply and sewage as well as school and health center (if applicable); • The project will provide logistic support to all eligible APs in relocation of their assets and salvaged material of affected structures to project-based relocation site or alternate place of AP's choice;
Transport allowance	All types of structures requiring relocation	All APs and tenants required to relocate as a result of losing land and structures	• For residential structure; a lump sum amount as per ground situations to cover transportation costs for all occupants and their belongings to the project-based relocation site or location of affected persons of choice within the project district. • For commercial structure or agricultural farm structure a lump sum amount as per ground situations for shifting of affected assets and belongings to alternate location/site for re-establishment of the asset.
5. INCOME RESTORATION			
Impacted land-based livelihoods	Restricted third-party land use rights	All APs with land-based livelihoods affected	• Land for land compensation through provision of plots of equal value and productivity as that of lost and if land-based compensation is not possible than non-land-based options below will be considered to restore livelihood in addition to cash compensation at full replacement costs for other assets lost. • Project-based employment opportunities for affected persons will be worked out and included in bidding documents; or Training with additional financial support to invest as well as organizational/ logistical support for establishing alternate means of livelihood.
Restricted access to means of livelihood	Avoidance of obstruction by subproject facilities	All APs	• Un-interrupted access to agricultural fields, business premises and residences of people in the project area will be ensured in consultation with the affected persons.
Businesses	Temporary business loss due to partially affected	Owner of business (registered, informal)	• Cash compensation equal to lost income during period of business interruption (maximum up to 3 months) based on tax record or, in its absence, comparable rates from registered businesses of the

Type of Loss	Specification	Eligibility	Entitlements
	productive assets		same type with tax records or computed based on officially designated minimum wage rate.
	Permanent business loss due to permanent loss of productive asset.	Owner of business (registered, informal)	• Cash compensation equal to lost income for 6 months based on tax record or, in its absence, comparable rates from registered businesses of the same type with tax records, or computed based on officially designated minimum wage rate; and • Provision of project-based employment to one of the grown household member or re-training with opportunity for additional financial grants and micro-credit and organizational/logistical support to establish affected persons in alternative income generation activity
Employment	Employment loss (temporary or permanent) due to lost productive assets.	All laid-off employees of affected businesses	• Cash compensation equals to lost wages at comparable rates as of employment record for employment interruption (maximum r a period of 3 months) if employment loss is temporary, and for a period of 6 months if employment loss is permanent. In case the employment wage record is unavailable, allowance will be computed based on official minimum wage rate; or • Provision of project-based employment or re-training, with additional financial as well as organizational/logistical support to establish affected persons in alternative income generation activity.
6. SPECIAL PROVISIONS			
Vulnerable APs	Livelihood improvement	All vulnerable APs including those below the poverty line, the landless and those without legal title to land, the elderly, women and children, and indigenous peoples.	In addition to applicable compensation entitlements for affected assets and resettlement/income restoration entitlement explained from 1 to 4 the vulnerable affected persons will be provided with: • Subsistence allowance for 3 months either computed based on officially designated minimum wage rate or other rehabilitation measures computed in consultation with affected persons based on income analysis and defined in the RPs accordingly. • Assistance to access legal and affordable access to adequate housing and Preference for provision of project-based employment to improve or at least to restore living standards of the affected household.

III. IMPACT ASSESSMENT AND SOCIOECONOMIC INFORMATION

39. It was not possible to screen potential school sites during project appraisal as the list of project school sites is still under preparation and centralized design prototypes of planned climate-resilient multipurpose ICT and Science Laboratories have not been prepared. Before commencement of the tranche payments as per agreed DLIs, social due diligence including impact screening and assessment, identification and socioeconomic analysis of potentially affected persons, preparation of requisite due diligence documents commensurate with the social impact assessment is to be furnished by the EA/IA for all project school sites included in the program. For screening and assessment of IR impacts, the safeguards specialists engaged by the IA will closely coordinate with the district school education authorities, project school design engineers to discuss and suggest options to avoid and minimize IR impacts and to prepare IR screening checklists and RPs if required accordingly. This social impact assessment and socioeconomic analysis including screening of project school sites, documenting inventory of lost assets (ILA) with census of affected persons, conducting socioeconomic assessment (SEA), detailed measurement survey (DMS) and VLA for affected assets (if any) at project school sites with IR impacts will follow the procedures explained below.

A. IR Impact Assessment

40. IR Impact assessment for screening of candidate school sites to finalize the list of eligible schools in all districts will be started early and the project engineering team will be coordinated to avoid and minimize the resettlement impacts to maximum possible extent. The land titles of existing school land, IR/IP impacts (if any) due to encroached school land or established third-party land uses including encumbrances/risks from non-mutated previously donated school land will be identified and documented. The IR risk screening and categorization criteria explained in preceding chapter will be followed for screening of IR risks associated with each site and conducting detailed impact assessment for sites involving potential IR impacts to deliver the requisite safeguards due diligence of resettlement planning documents.

B. Census Survey and Inventory of Lost Assets

41. The EA/IA's safeguards staff tasked with resettlement planning will work closely with the EA/IAs designated focal staff at district level and the design engineers to explore and adopt the measures for avoiding, minimizing and mitigating the IR impacts through design modifications and conduct detailed assessment of affected assets. The enumeration of affected assets and census survey of affected households/people will be conducted on 100% basis and the affected persons facing loss of their assets will be recorded and linked to the inventory of lost asset.

42. Pre-structured census survey questionnaire will be used for enumerating all affected people including those facing physically and economically displacement due to lost residential or productive assets (arable land or commercial structures/business enterprise). The census will: (i) register who the potential affected persons are; (ii) assess their income and livelihoods; (iii) prepare inventory of their assets affected due to the project; and (iv) collect gender disaggregated information on the economic and socio-cultural conditions of affected persons. So, the census questionnaire will include sections on profile of affected households (AHs) to collect and record household characteristics (family type with papulation size (gender segregated), ethnicity, literacy status (gender segregated), household income level with income sources and vulnerability status. The census will also inquire into the compensation preferences and expectations of each AH. The data on affected assets and census of AHs/Aps will be used to prepare a quantitative inventory of lost assets (ILA) linked to the entitled affected persons as IR impact database.

C. Socioeconomic Assessment

43. Besides census of 100% AHs, SPS 2009 requires socioeconomic assessment of affected households in entirety. Based on aimed interventions of PN&HWR – RBL program, it is perceived that the IR impacts will be limited to small number of affected households linked to selected COE site at three different locations i.e. Lahore, Multan and Rawalpindi, therefore, it will be ensured to record socioeconomic information of all affected households to understand and document social and economic status of the AHs and develop socioeconomic baseline database accordingly. Additional questions will be included in census questionnaire to capture socioeconomic status of the AHs and other survey tools and techniques including focus group discussions; key informant interviews and walkthrough surveys could also be used to have a vivid idea about socioeconomic trend and profile of the population around COE sites. This survey will assist to investigate the socioeconomic condition and identify the project impacts on affected people including the poor, land less, women, elderly and other vulnerable groups to establish benchmarks for monitoring and evaluating the implementation of a subproject's compensation and rehabilitation program. Wherever possible, data collection and presentation will be disaggregated by gender and other relevant social characteristics, depending on the social groups of concerns, i.e. the vulnerable households and ethnic minorities and IPs if any.

D. Detailed Measurement Survey and Valuation of Lost Assets

i. Detailed Measurement Survey (DMS)

44. Once detailed design is ready, a DMS will be carried out with participation of affected persons for identifying and providing the measurement of the exact dimensions and quantities of all affected assets, including (as applicable), buildings, communal/public or cultural/religious facilities, crops, trees and lost business and income sources and wages due to clearance of available school/ government land for execution of project works. Besides providing the quantitative assessment of affected assets, it will determine the scope (full or partial) and nature of loss (permanent or temporary) to determine risk of physical and economical displacement of affected people. The DMS will be the basis for assets valuation and compensation calculation (on replacement cost) for impacted assets and lost income sources as well as determination of relocation, rehabilitation and income restoration entitlements and finalization of compensation budget to be included in the RP.

ii. Valuation of Lost Assets

45. The SPS 2009 requires that the compensation for acquired assets should be on a replacement cost basis including fair market value, transaction costs, transitional support, interest accrued, and other applicable payments under law. While section 23[22] of LAA 1894 explains the compensation determining mechanism based on market value as of recorded transaction for the year preceding publication of section 4 notification. Besides waiving of taxes, fees or any charges on land subject to acquisition, under the LAA, the affected landowners are provided with additional land acquisition surcharge at the rate of 15% of assessed land compensation cost. Although the

[22] Section 23 of the LAA requires to consider the following in computing compensation: (i) fair market value as of section 4, (ii) sustained crop and tree losses, (iii) losses resulted from severing of land, (iv) losses for injuriously affecting other immovable or moveable holding and earnings, (v) losses for compelled change of residence or business place and (vi) diminution of profits, etc.

mechanism for compensation of assessment under LAA are somehow consistent to the SPS requirements but compensation cost assessed under law usually fall below the replacement cost because of the tendency of undervalued registration of recorded transactions.

46. The LAA provisions will trigger only when land is acquired. It provides mechanism for expropriation and procedures to compensate the interested persons facing loss of titled land and assets as of record maintained by the respective district land administration authorities under the Board of Revenue (BOR) Punjab. Under LAA, the interested person including the recorded titled owners and/or occupiers of affected assets having legally recognizable claims under national law are entitled to compensation. While the affected people without formal legal title or legal recognizable claim are not considered eligible for compensation under the national legal framework. It is aimed at to ensure the utmost efforts for selecting the COE sites with available government owned vacant land to avoid expropriation of private owned land for the project works. The perceivable IR impacts could be likely due to clearance of above land assets and interrupted access to the land and assets established by the third-party land users. Presumably the land acquisition will not be involved, so it is likely that the LAA provisions will not be triggered. Therefore, to bridge the gap regarding assessment of compensation, this RF suggests the mechanism below for valuation of impacted assets on replacement cost including land and assets that may be located on the project school land.

47. **The Land**. The sites/locations, wherever, acquisition of private land under LAA provisions is likely, will not be considered under the program, whereas possibility for securing required additional land through voluntary donation of land by the willing donor households/local communities will be explored Nevertheless, for the purpose of streamlining the land valuation process with the SPS requirements, the EA/IA will facilitate calculation of replacement costs value of land by considering the factors including but not limited to: (i) updated land valuation tables for the current year, (ii) estimated land costs determined based on yearly average from recorded transactions in preceding one year from date of publication of section-4 under LAA, (iii) the price paid for similar land types recently acquired in the project area and paid price for similar land types in recent private transactions (iv) consultation with respectable people, property agents and appraisers who are disinterested with regard to the value of the land; and v) other available information and instructions on valuation of assets under national laws and ADB's SPS requirements.

48. **Assets other than land**, including structures, crops, tress if affected due to clearance of required land for establishing the COEs or temporary occupation of land for facilitating the program implementation works will also be compensated on replacement cost without depreciation and salvage material will be allowed to be taken by the affected persons. For providing compensation on replacement cost for affected assets other than land, following measures will be considered for valuation and assessing unit compensation rates for different asset types:

- Buildings and structures (residential, commercial, public/communal or any other) will be valued at replacement cost based on size and type of affected assets by taking into account construction type, quality and prevalent market rates for construction material and labor to re-establish similar structure at nearby location or on alternate site. Calculation of compensation for the partial and full loss of structure will be determined based on functional viability of the structure. Compensation will be provided to restore the partially affected structure or to re-establish a similar structure on nearby alternate location. The following guidelines will be followed:

a. Partially affected structure when remaining structure is functionally viable and can be continued in use, it will be valued and compensated on replacement cost bases to the extent of affected part of structure for restoration of impacted structure;
b. Partially affected structure when not restorable to its original use or a fully affected structure will be valued on full replacement cost basis following mechanism explained in first bullet above.
c. In addition, the costs for relocation and installation of applicable amenities (water supply and sanitation, power supplies i.e. electricity/gas supply and communication lines etc.) will also be computed at replacement cost and included in compensation package.
d. Depreciation, salvageable materials or transaction costs and taxes will not be deducted, rather salvage will be allowed to the affected persons.
e. Preferably, unit rates for building structures will be evaluated through the building division of the public works department at district level.

- Crops will be valued at current market rates of gross annual value of harvest as determined by the relevant district offices of the Punjab Agricultural Department.
- Fruit Trees: The loss of fruit and non-fruit bearing trees will be compensated based on their type, productive age and the market value of the produce for the remaining period of its average life or a period required to grow a new tree with same production potential. The value of younger but un-productive fruit trees will be based on the expenditure made to bring the tree to its current state. Coordination will be made with the agriculture and horticulture departments of the Punjab for assessment of fruit tree losses.
- Timber wood trees will be assessed based on the average volume and quality of wood produced and taking into consideration the size and classes as determined and assessed by forest department i.e. assessment based on tree type, girth, height and volume of wood produce.
- Lease rate/rent for temporary use of land will be fixed as per prevailing market rate through mutually negotiated agreement with the affected persons.

E. Preparation of RP

49. Based on the results of the census, DMS, valuation of affected assets, and consultations with the affected persons and key stakeholders, the PIU in the IA will prepare the RP to address IR impacts and submit it to EA and ADB for review and clearance. The RP will include compensation for affected assets on replacement cost basis with resettlement, relocation and income restoration costs for affected persons as well as measures to assist vulnerable groups including poor, landless, elderly and women headed households to improve or at least restore their living standard to pre-project level in strict compliance to the provisions of this RF. Outlined template provided as **Appendix-IV** will be followed for preparing the RPs.

IV. CONSULTATION, PARTICIPATION AND INFORMATION DISCLOSURE

A. Consultation, Participation and Information Disclosure strategy (CPID)

50. Consultations, participation and information disclosure will be an integral part of social safeguards impacts screening and assessment, planning, design and preparation of required social safeguards documents including RPs at project design stage as well as during RP implementation and social safeguards management and monitoring throughout project execution. The IA/EA will devise and implement a comprehensive consultation, participation and information disclosure (CPID) strategy to ensure the stakeholders who are directly or indirectly involved in the project including: (i) residents and community in COE vicinity; (ii) students, parents and teachers; (iii) affected persons, marginalized/vulnerable beneficiary groups; and other government officials and civil society in project districts. CPID will be an ongoing process that will begin at the subproject preparation stage, and it will be carried out on an ongoing basis throughout the subproject cycle for timely disclosure of relevant information and enabling the project executors to document and address the concerns of stakeholders including APs and incorporate their views in decision-making.

51. As part of CPID, meaningful consultations will be carried out particularly with affected persons, beneficiaries and other key stakeholders during project design, conducting social due diligence and preparation and implementation of RPs of the subproject. The consultation results will be documented and incorporated in project design and considered for determination of compensation entitlement, preparation and implementation of the RPs wherever possible. The affected persons will be thoroughly informed on the results of the census including inventory of losses and preferences of APs for compensation and other resettlement assistance will be given due consideration. Separate consultation meetings with women and other vulnerable groups will be held to ensure the voices of vulnerable are not constrained by powerful sections of the community.

52. The safeguards staff of the EA/IA with the assistance of the safeguards and technical staff of the chief engineer (building) C&W, department will retain a close liaison with the local community, APs and other key stakeholders for each COE. The affected persons will be informed on their rights, eligibility, compensation entitlements, payment procedures and requirements. The project-based GRM with grievance handling mechanism will be explained to the local communities, affected persons and other relevant stakeholders. Information related to processing of claims, payment of compensation, project works implementation timelines and delivery of resettlement, rehabilitation and income restoration costs/measure will be provided repeatedly. The camp office and the deployed supervision staff of the implementing partner will be used as a local level consultation forum at each COE site whereas the PIU in IA will be the program level forum for consultations and information disclosure. The consultation meetings will be documented comprehensively and meeting record including signed attendance lists, photographs and findings about reviewed key issues and agreements reached will be maintained.

B. Information disclosure and dissemination

53. The RF as supplementary document of the PSSA for the program will be disclosed on ADB and EA/IA websites before appraisal of the project. The RPs (if required) to be prepared for any of the selected COE site, once the detailed designs have been finalized will also be disclosed on the websites of ADB and EA/IA and by placing hard copies at accessible locations including the office of the PIU in IA and the camp office of the PIU/ General Manager (healthcare projects) IDAP at the COE level. The summary of the RPs detailing information about subproject

description and LAR impacts, legal framework, compensation eligibility and entitlements, GRM, institutional arrangement, compensation payment process and implementation time frame will be translated into local language and will be disclosed to the APs and local communities.

Table 3: Consultation, Participation and Information Disclosure Strategy

CPID action	Stakeholders	Method	outcome
During RP preparation			
IR impacts assessment and census survey, finalization ILA	Affected households/persons and local community, deputed focal points of implementing partner and EA/IA's project staff responsible for execution of project works.	Individual meetings focus group discussions.	Stakeholders including affected persons and local communities informed on project impacts. Concerns of affected persons recorded and mitigated.
SES survey, FGDs and announcement of IR cut-off date	Affected households/persons and local community, of implementing partner and EA/IA's project staff responsible for execution of project works.	Quantitative survey, and key informant interviews, individual meeting, focus group discussions and walk through surveys	Affected Households' profile and IR related concerns and suggestions recorded. Cut-of date disclosed and explained.
Asset Valuation, determination and finalization of compensation entitlements.	Affected households/persons, local communities, property dealers, commission agents and relevant officials from inline government departments and EA/IAs responsible staff.	Individual meetings focus group discussions and key informant interviews.	Replacement value/cost of affected asset determined. Asset Valuation and compensation entitlements explained to the APs
Consultation meetings for disclosure of draft/final RP.	Affected households/persons and local community, deputed focal points of implementing partner and EA/IA's project staff responsible for execution of project works,	Formal RP disclosure meeting/workshop	The RP provisions disclosed and documented.
During RP implementation			
Disclosure of RP	AHs/APs and local communities, deputed focal points of implementing partner, EA/IA's Project and IR staff responsible for implementation and monitoring of RPs. .	RPs disclosed on websites and by placing hard copies at camp office of implementing partner for respective COEs Translated (Local language) summary of RP handed to AHs/APs.	The RP uploaded on ADB and executing agency websites. The affected persons and other stakeholders informed on RP provisions.
Grievance redress mechanism established and functional	AHs/APs, local communities, deputed focal points of implementing partner, EA/IA's Social Safeguards staff in PIU responsible for implementation and monitoring of RPs.	Individual and focus group meetings; Dissemination of GRM related information through leaflets/broachers and dis-playing banners/ hoardings at COE sites	APs and local communities fully aware of the project-based GRM its access mechanism for review and redressing project-related complaints and concerns.
RP implementation arrangement and timelines	Affected persons, local communities, deputed focal points of implementing partner, EA/IA's Project and Social Safeguards staff in PIU responsible for implementation and monitoring of RPs.,	Individual and focus group meetings; delivery of compensation payment notices and installing banners/hoardings at school sites.	Affected persons aware of compensation processing and payment mechanism. Compensation claims processed and paid in a timely manner.
Social Safeguards/RP monitoring	The safeguards and M&E staff in PIU responsible for monitoring, and deputed focal points of implementing partner for each COE site, EA/IA and ADB.	Individual meetings, Key informant interviews FGDs and disclosure of monitoring reports on web.	RP implementation progress assessed, and monitoring reports disclosed to affected persons and through web.

V. INSTITUTIONAL ARRANGEMENTS

54. This Results-Based Loan (RBL) program for implementing Punjab Nursing and Health Workforce Reforms will be executed by the Specialized Health Care and Medical Education Department (SHC&MED) of the Punjab. The land acquisition and resettlement planning, preparation, implementation and monitoring of subproject as well as compensation/rehabilitation program described in this RF involves several institutional actors and distinct processes to be carried out by different agencies. The main institutions that will be involved in the IR activities are the Specialized Healthcare and Medical Education Department (SHC&MED) as Executing Agency (EA) and a Project Management Unit/Project Implementation Unit being established under Special Secretary (Development and Reforms) as Implementing Agency (IA). Meanwhile, the EA/IA will engage Infrastructure Development Authority Punjab as Implementing Partner for Infrastructure Development who will support the IA in procurement, design and implementation of infrastructure development component under output-2. The IA will lead in conducting needed IR impacts screening, assessment and resettlement planning based on detailed design to support the EA for ensuring execution of designed interventions for establishing each COE under output-2 of the RBL Program is consistent with the outlined RF provisions and ADB's safeguards policy requirements.

55. Further the EA/IA may engage with the other line departments/ agencies of the provincial government for project IR and IP impact assessment, detailed measurement and valuation of affected assets likely to be cleared/removed from the government owned land earmarked for establishing COE for nursing education within periphery of existing tertiary care hospital / medical education institution or allocated government land nearby. The institutional arrangement for supervision and implementation and of IR process as per provisions of this RF is explained below.

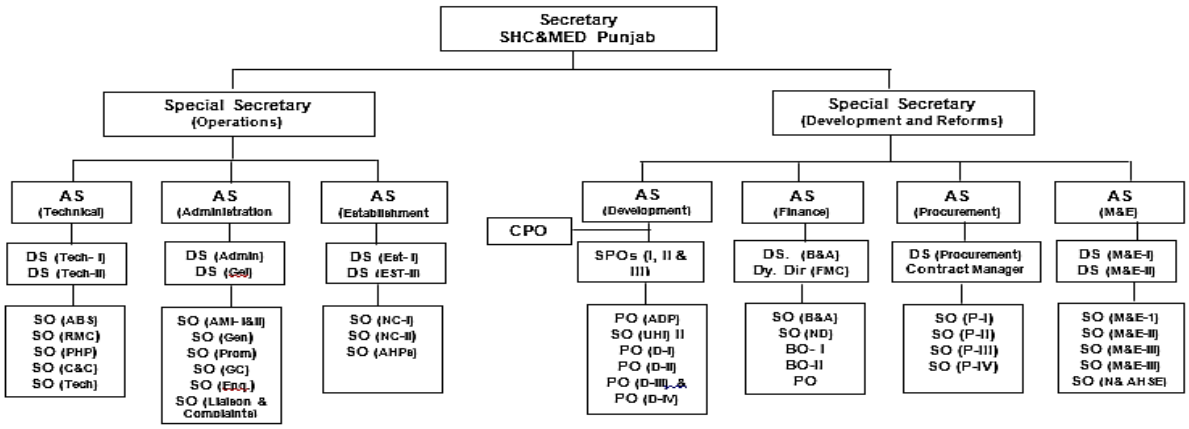
A. Executing Agency: Specialized Health Care and Medical Education Department (SHC&MED)

56. The Specialized healthcare and medical education department is mandated for providing: i) curative healthcare services across Punjab through tertiary care hospital including specialized institutions; and ii) state-of-art medical education facilities including medical universities/colleges, nursing colleges and allied health professional college/school to provide the quality medical education to the public. As executing agency for ADB funded RBL program, SHC&MED will be overall responsible planning, design and financing of all IR tasks and cross-agency coordination for timely preparation, implementation and monitoring of social safeguards management activities under the program.

57. The SHC & MED operates under the administrative control of the Secretary SHC & MED. For performing mandated regulatory, development and reforms related functions, the Secretary SHC&MED is supported by two special secretaries i.e. Special Secretary (Operations) and Special Secretary (Development and Reforms). Summarized organizational setup presented below exhibit that the Special Secretary (operations) assisted by three Additional Secretaries oversee the technical, administrative and establishment related functions of established heath facilities and medical education institutions. While the Special Secretary (Development and Reforms) assisted by four additional secretaries takes care of development, finance, procurement, monitoring & evaluation related functions mandated to SHC & MED. This structured approach ensures focused attention to each critical area of healthcare and medical education. Review of organization structure of SHC&MED

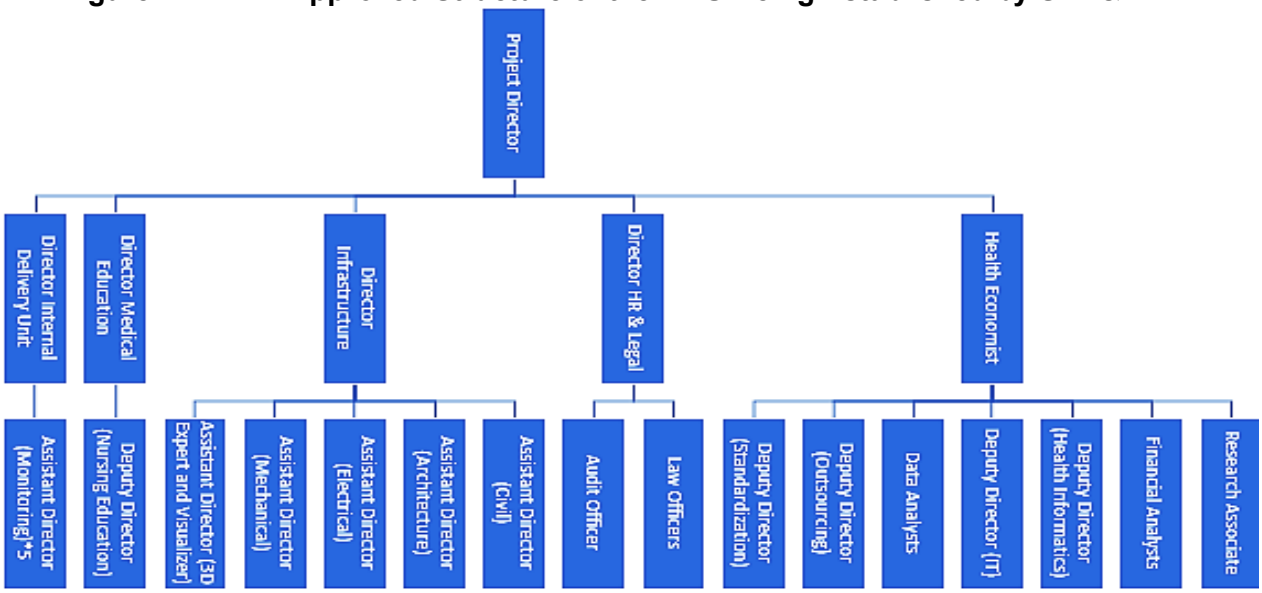
58. The SHC&MED being an administrative department mainly focuses on over all regulation of the health services and medical education facilities, legislation, policy formulation and implementation of reforms agenda for enhanced health services delivery and medical education across the province. It has aimed to enhance the service delivery by revamping the existing infrastructure and by adding new schemes for capacity enhancement. However, the SHC&MED lacked in-house capacity and expertise needed for assessment of existing infrastructure, determine and recommend infrastructure rehabilitation and upgradation requirements, preparing feasibility reports including required safeguards due diligence documents for including RPs for IFI funded projects, PC-1s and concept notes for review and approval of Competent Authorities.

Figure 1: Simplified Organizational Structure of the SHC&MED



59. The SHC&MED has planned to establish a Project Management Unit (PMU) under the Specials Secretary (Development and Reforms) to engage the required expert staff to overcome its capacity constraints. As per approved PC-1, the PMU headed by a Project Director will have the skilled professionals across diverse fields such as health economist and Directors with needed technical expertise for HR & Legal, Infrastructure, Medical Education and internal delivery etc. The goal of establishing the PMU is to ensure that the SHC&MED has the necessary expertise in these critical areas to effectively assess, plan, manage and oversee its development projects and its operations. In the organogram presented below, the positions presented in the blue boxes are PDWP approved PMU structure for SHC&MED.

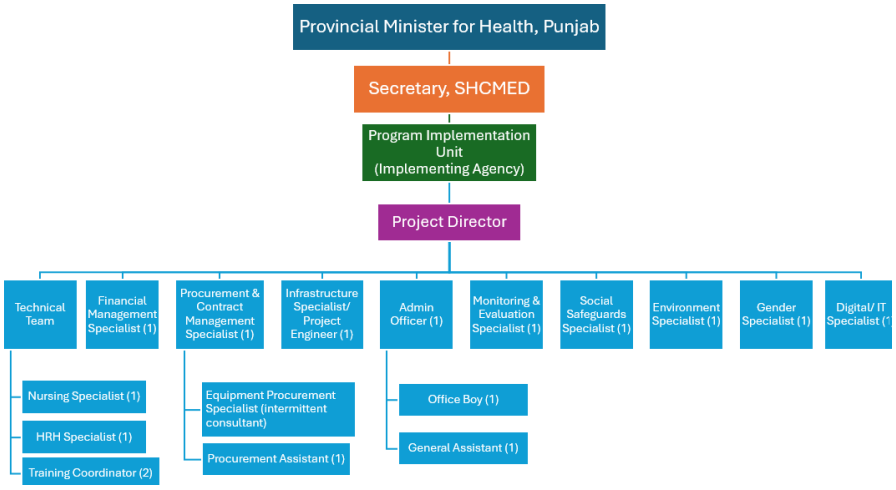
Figure 2. PDWP Approved Structure of the PMU Being Established by SHC&MED



B. Implementing Agency: Program Implementation Unit of SHC&MED

The review of PMU structure and approved PC-I for PMU transpired that many key expert positions needed for smooth implementation of the PN&HWR – RBL program including **social and environmental safeguard specialists** for ensuring compliance with outlined safeguard requirements of the international financial institutions (IFIs) like Asian Development Bank (ADB) are skipped in the PMU structure. Therefore, it is recommended that a project implementation unit with requisite expert staff position should be established for augmenting the capacity of the SHC&MED to ensure that the implementation of the PN&HWR – RBL Program is compliant with the outlined policy requirements of the ADB. It is aimed that the recommended program implementation unit (PIU) for delivery of RBL program, which will be mandated to operate as Implementing Agency for the ADB financed PN&HWR – RBL program. Organogram below exhibit the recommended staff positions including program manager and required key expert staff for delivery of PN&HWR – RBL program to be engaged for Program Implementation Unit of the SHC&MED.

Figure 3. Proposed Organizational Setup of Project Implementation Unit



60. Recommended expert staff positions including a dedicated social safeguards specialist will be hired and deployed in the PIU for assisting the Implementing Agency (IA) to ensure the outlined provisions of this RF are followed and complied for conducting safeguards due diligence of all selected COE sites eligible for interventions under output-2 of the PN&HWR – RBL program. The TOR for hiring of social safeguards specialist in PIU is attached as **Appendix-V.** The recommended social safeguards staff will assist the PIU for screening of safeguards risks, conducting detailed assessment of social impacts and stakeholder's consultation and preparation of safeguards due diligence documents including RPs (if needed). The respective safeguards expert will assist the IA monitoring of implementation progress on social safeguards-related interventions and deliver the periodic social safeguards monitoring and RP compliance (if needed) reports for EA/IA and ADB's review and disclosure.

61. The safeguards staff shall coordinate with the key focal person deputed by the EA/IA, IDAP i.e. the office of General Manager (healthcare projects) and other government entity to be engaged for carrying out social safeguards-related activities and tasks during planning, design and execution of the project interventions and activities for establishment of the COEs at selected sites. Particularly, safeguards management activities below will be performed by the safeguards staff for discharging its social safeguards-related activities in a manner consistent with the provisions of this RF, national legal framework and ADB's SPS 2009 requirements.

(i) Support the IA/EA and the deputed focal points by the SHC&MED in screening of IR risks associated with selected COE site and guide them to exclude the sites involving significant, diverse in nature and unprecedented IR impacts following screening and categorization criteria explained in this RF.
(ii) Prepare and submit screening check lists with consolidated social safeguards due diligence report separately for the COEs sites having no IR impacts and the COE sites having IR impacts (less significant) due to clearance encroached assets and restricted use earmarked land for establishing COEs with the EA/IA for endorsement and transmission to ADB's project team for review, acceptance and allowing tranche payments as per achieved DLIs.

(iii) In case of SOE sites with noted IR impacts, safeguards staff will coordinate with design team and counterpart staff in implementing partner of the EA/IA and in line government agencies for detailed impact assessment, valuation of affected assets, census and socioeconomic assessment of affected households/people, ascertaining compensation entitlement (on replacement cost basis) and preparing inventory of lost assets and resettlement plans subsequently following provisions and RP outline included in this RF.

(iv) Support the project team and relevant design and safeguards staff of the implementing partner in conducting and documenting meaningful consultation with identified AHs/APs and other interested stakeholders including local communities, inline government departments and community-based nongovernment organization etc.

(v) Guide and assist project teams in IA and the office of the General Manager (healthcare projects), IDAP for maintaining consultations record including meeting minutes, attendance sheets and pictorial profile etc.

(vi) Assist the IA/EA in establishing fully operational multi-tier program -based GRM in PIU at SHC&MED Level and at COE level in camp offices of the General Manager (healthcare projects), IDAP and facilitate the IA/EA in tracking of complaints, conducting field investigations and redressing the complaints/grievances tendered by the aggrieved persons/parties.

(vii) Assist IA/EAs for coordinating with line government departments including Buildings Department, Land Revenue Department, Forest Department and Agriculture Department at the district and sub-districts level, local communities, property agents and independent appraisers for asset (land and other assets) valuation and compensation calculation in a manner consistent with this RF provisions.

(viii) Assist IA/EA in implementation of CPID strategy as outlined in this RF and ensure timely disclosure of information to all affected persons about program interventions and potential IR risks and facilitate disclosure of RP provisions and entitlement to the APs and information dissemination about the GRM and compensation payment mechanism by formal and informal means;

(ix) Establish and maintain IR database at IA level, track day to day RP implementation and compensation payment progress and keep RP database updated and readily available for review and use to generate RP implementation progress reports and periodic social monitoring reports.

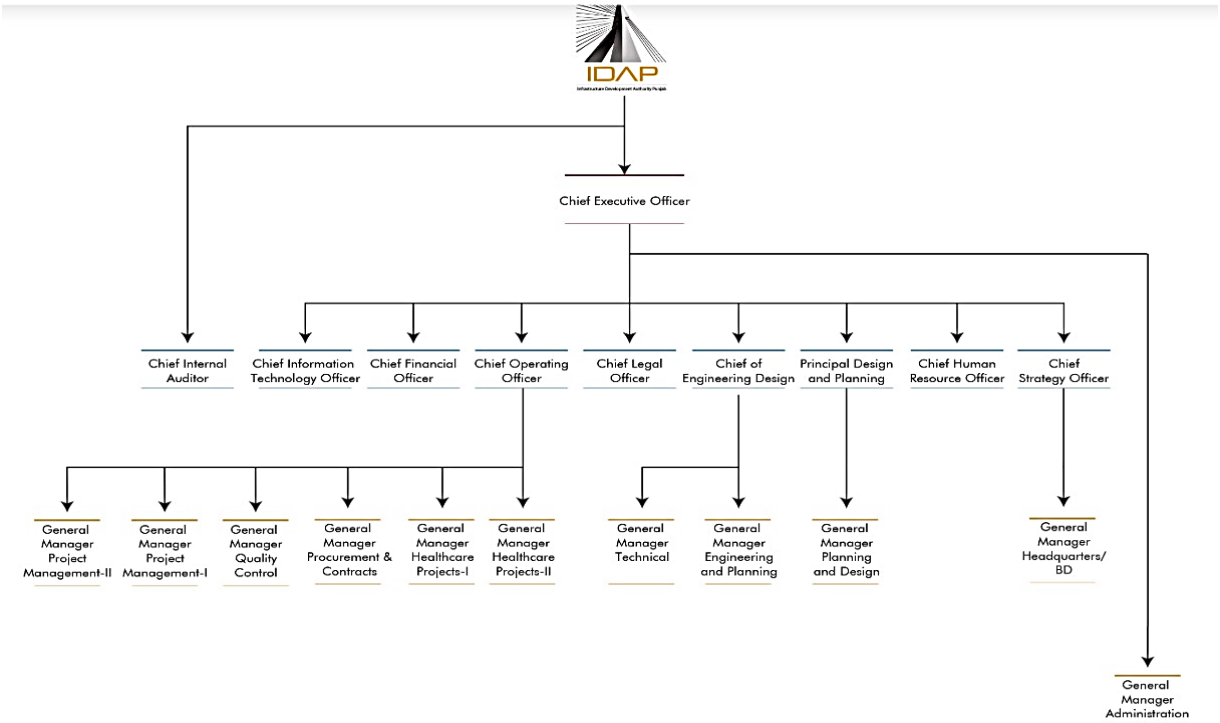
(x) Prepare periodic (biannual) social monitoring reports including progress on compensation payment, CPID activities planned and implemented, grievances recorded, reviewed and resolved during monitoring period. Nonetheless, the monitoring reports will also include information on construction related unanticipated impacts identified and implemented corrective actions during monitoring period.

62. Besides performing activities stated above, the safeguards expert in the PIU will design and implement safeguards capacity building plan for the relevant staff in IA/EA and offices of respective General Manager (healthcare projects), IDAP selected for executing and supervising the interventions for development of physical infrastructure and establishment of COEs as outlined in the designed outputs of the PN&HWR – RBL program. Meanwhile he will work closely with the technical and safeguards staff deployed by General Manager (healthcare projects), IDAP at each COE camp office for handholding and providing on-job coaching and guidance about handling and management of safeguard issues and risks that may emerge during execution of the program activities.

C. Service Provider: The Infrastructure Development Authority Punjab (IDAP)

63. The EA/IA will select Infrastructure Development Authority Punjab (IDAP) as service provider for infrastructure development component under Output 2 of the program i.e. establishment of COEs. The IDAP as service provider will lead the tendering and procurement process for engaging design & construction supervision consultants and civil works contractors for designing, supervision and implementation of the construction activities at site for each COE. It will also support for procurement and installation of machinery and equipment in the COEs. The IDAP was established in 2016 under the IDAP Act of 2016 for execution of mega infrastructure development projects efficiently, aesthetically, and transparently and without compromising quality or entailing delays. It provides complete project management services including feasibility, design, contract management, execution, supervision and third-party evaluation of the mega infrastructure project. Since, the IDAP has been working for multiple infrastructure development projects, so it has established dedicated set-up headed by General Managers for project management, quality control, procurement and contracts as well as for healthcare projects under the Chief Operating Officer (COO), IDAP. Meanwhile, under the Chief of Engineering and Design, the offices of General Managers technical, planning and design are in operation to supervise technical, engineering and planning activities. Organogram of IDAP is provided as figure-4 below.

Figure 4. Organizational Set-up of the IDAP



Source: IDAP.

64. The IDAP structure show that it has General Managers with their support team for planning, design, procurement and implementation of mega healthcare projects that confirm the hands-on experience of IDAP in dealing with development of health related infrastructure. The IDAP does not have dedicated unit to oversee the Environmental and Social Safeguards compliance requirements under policies of the International Financial Institutions like ADB. Nonetheless, it has deployed a qualified Environment Specialist under the General Manager (GM) Technical and a Health, Safety, and Environment (HSE) Specialist under the GM Quality Control who are mainly responsible for ensuring compliance with National/Provincial level legal framework, but the IDAP lacks in-house social safeguards management capacity that may be needed to manage social safeguards compliance requirements and handling of social issues likely to emerge during implementation of the program activities.

65. Incase IDAP is engaged as service provider, in addition to facilitating in procurement of design/construction supervision consultants and contractors, it will have to engage and mobilize the construction site management technical and administrative staff for establishing a fully equipped camp office for tracking and supervising the constructions works at site. The review of safeguards management capacity confirmed that IDAP don't have qualified and dedicated social safeguards staff needed for screening, assessment and management of social safeguard issues that could be likely form infrastructure development component of the program. So, the risks related to safeguards noncompliance can be a matter of concern. Therefore, it is suggested that the EA (SHC&MED) / IA (PMU/PIU) should ensure deployment of experienced social safeguard consultant for each COE site by the IDAP through its design / construction supervision consultants. The social safeguards consultant will support in screening and assessment of safeguard risks and likely IR impacts for all COE sites, preparing and timely delivery of quality safeguards documents including screening check lists, safeguard due diligence reports and RPs

(if needed) for review and endorsement by the IA/EA. Further, it should be ensured that COE level GRM is notified and operationalized in the camp office established to execute and supervise the construction works for each COE. The safeguards consultant will maintain baseline information about noted safeguard risks, record of consultations and grievance received/resolved for each COE site and in addition to providing safeguards-related input in program progress reports, he will support the social safeguard specialist for preparing and timely delivery of social monitoring reports for IA's/EA's review and endorsement.

VI. GRIEVANCE REDRESS MECHANISM

A. Introduction of GRM

66. The SHC&MED has established a web-based complaints filing and resolution system. An online portal for complaints and suggestions is published for the users and operators of the health and medical education facilities to register and respond concerns and complaints of the beneficiaries and service users. The complaints received and recorded through the online complaint portal are assessed and inquired through the concerned authorities of the SHC&MED and findings including recommendations of the investigations are implemented and communicated to the complainants. Nonetheless, said system is available and functioning with wider scope which can be used for raising issues and filing complaints related to the PN&HWR – RBL program, however it is comprehended that a RBL program specific GRM will have to be established and operationalized for registering, reviewing and redressing the RBL program related issues and complaints.

67. Keeping in view the noted requirement, a program specific GRM has to be institutionalized for recording, reviewing and addressing program related grievances and concerns about social and environmental safeguard issues regarding involuntary resettlement planning, environmental management and work place security and safety etc. that may emanate during planning, design and execution of the program works. This RF outlines the structure, roles and functions of the GRM with a particular focus on the functions of the GRM regarding social safeguards and IR related issues.

68. Meaningful consultation and information disclosure is key to engage the stakeholders that may help to minimize the complaints and grievances, So, efforts will be exhausted to avoid grievances through strong consultations participation and information disclosure strategy (CPID) and by carrying out the IR activities in accordance with provisions of this RF. Nevertheless, some problems will not be resolved through CPID actions for which a program-based GRM will have to be established to provide an accessible and cost-effective forum to the affected persons and other aggrieved parties to approach and get their concerns and issues resolved. The social safeguard issues that can be raised and resolved through project-based GRM may include complaints and concerns on (i) screening and selection of school sites for program interventions, (ii) identification, assessment and documentation of affected assets, (iii) omissions and errors in inventory of lost assets ILA and in names of compensation entitled affected persons, (iv) concerns on assets valuation and awarded compensation, (v) delays in payment of compensation including relocation and rehabilitation costs etc. and vi) other social issues like damage to existing facilities and interrupted access to resources etc.

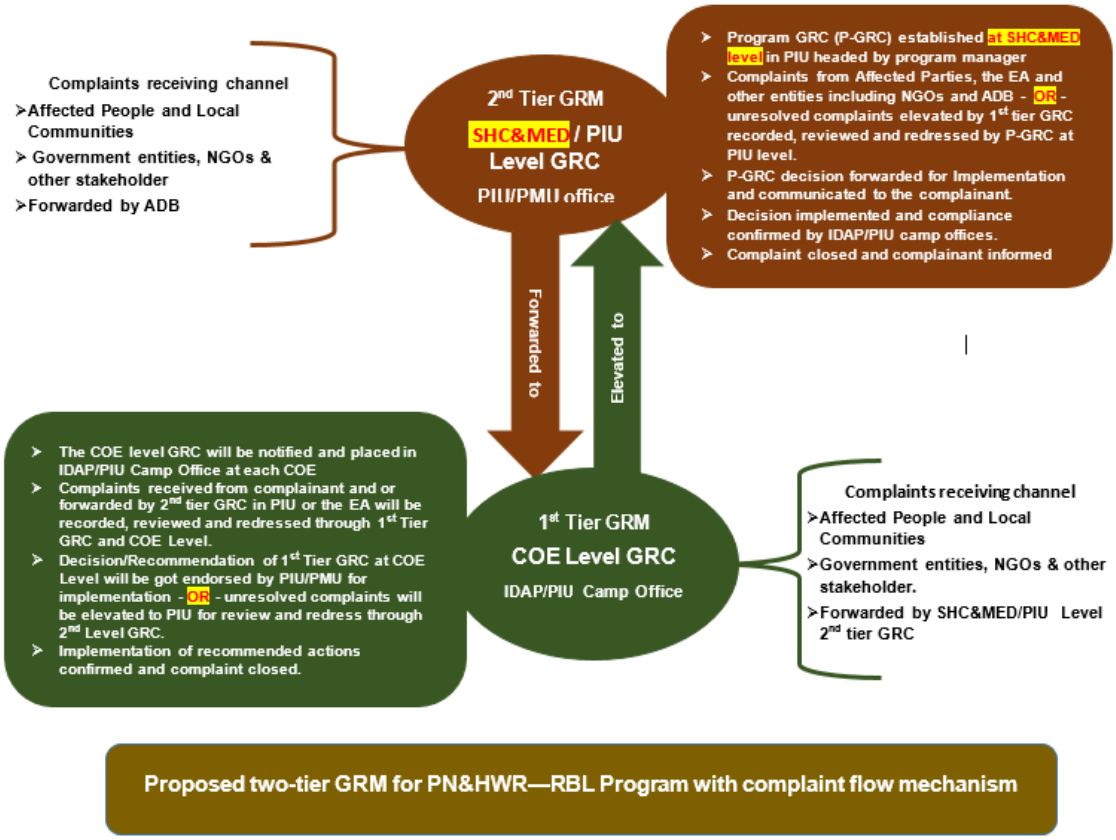
69. **Constitution of Grievance Redress Committees (GRCs) at COE and PIU level.** Based on the planned implementation arrangement, this RF suggests a two-tier GRM for the PN&HWR – RBL program. The first tier of GRM will be established at COE level by notifying grievance redress committee in the office of respective Chief Engineer (building) or in the camp offices to be established for each COE. The 1st tier GRC at COE level, headed by the officer-in-charge from the office of General Manager (healthcare projects) / site manager in the camp office will include designated representative of the SHC&MED from linked teaching hospital, PIU's safeguard staff and technical/construction supervisors and safeguards management staff in the camp office of the General Manager (healthcare projects), IDAP as its members. Whereas 2nd tier of the GRM will be established by notifying a Program GRC (P-GRC) in the PIU for PN&HWR – RBL program established at IA/EA level by SHC&MED. The P-GRC headed by the Program Director will include representatives of the SHC&MED, PIU's technical/engineering staff and

safeguards staff as its members. The social safeguards specialist in PIU will act as focal point for registering the social safeguards-related complaints and maintain the GRC proceedings and record about social safeguards-related complaints/grievance filed and redress through the P-GRC at PIU level.

70. It will be ensured that respective GRCs are notified and established within 60 days from the effectivity date of PN&HWR – RBL program loan. The PIU PN&HWR – RBL program will ensure to make the GRM accessible to all project affected communities in general and to vulnerable, including the poor, elderly, handicapped, female heads of households, as well as women and ethnic minorities.

71. **Stages in complaints and grievance handling**. A two-stage grievance redress system will be available to affected persons under the program and if the affected persons are not satisfied with the provided mechanism or opts to approach available remedy under law, they will be at liberty to approach relevant court of law under national legal recourse. Under the proposed two-tier GRM, the program GRC (P-GRC) headed by the program manager in PIU will be the ultimate level of grievance redress in the established program-based GRM. The complainants resolved in the GRM will be exempted from all administrative and legal fees that might be incurred are applicable in the resolution process of grievances. The GRM process for the project is presented as under.

Figure 5: Two-tiered GRM Process for PN&HWR – RBL Program



Source: Program documents

72. **First Level of GRM — COE Level GRC:** The notified GRC at COE Level and headed by site manager in camp office established for COE or the deputed officer in-charge in office of the General Manager (healthcare projects), IDAP will maintain a complaint register. All complaints either made by affected parties/stakeholders verbally or in writing to the site manager and/or designated member of the implementing partner or received from the PIU and other government entities will be entered in the complaint register. Within 5 days from the compliant receiving date, the COE level GRC will inform the PIU PN&HWR about type and nature of the complaint and seek technical guidance and support from the PIU safeguards team. After completing investigation process, COE level GRC can invite the aggrieved parties for personal hearing and to arrive at a solution within 30 days from receipt of complaint. The COE level GRC findings and recommendations will be communicated to the PIU for seeking administrative approval before formal communication to the complainants/aggrieved parties.

73. The efforts will be ensured that the COE level GRC decision is implemented and communicated to the complainant within 45 days from the complaint receiving date and complaint will be closed accordingly. The COE level GRC decision will be communicated to the complainants i.e. the aggrieved individuals/parties. In case, the COE level GRC fails to communicate with the aggrieved person in stipulated time frame, he can raise his complaint to the program level GRC in PIU after lapse of 45 days from the complaint submission date. However, if the complainant requires, he will be on liberty to elevate his issue directly to the program level GRC (P-GRC) notified in the PIU established by SHC&MED for PN&HWR – RBL program or other administrative and judicial form available to complainant/s.

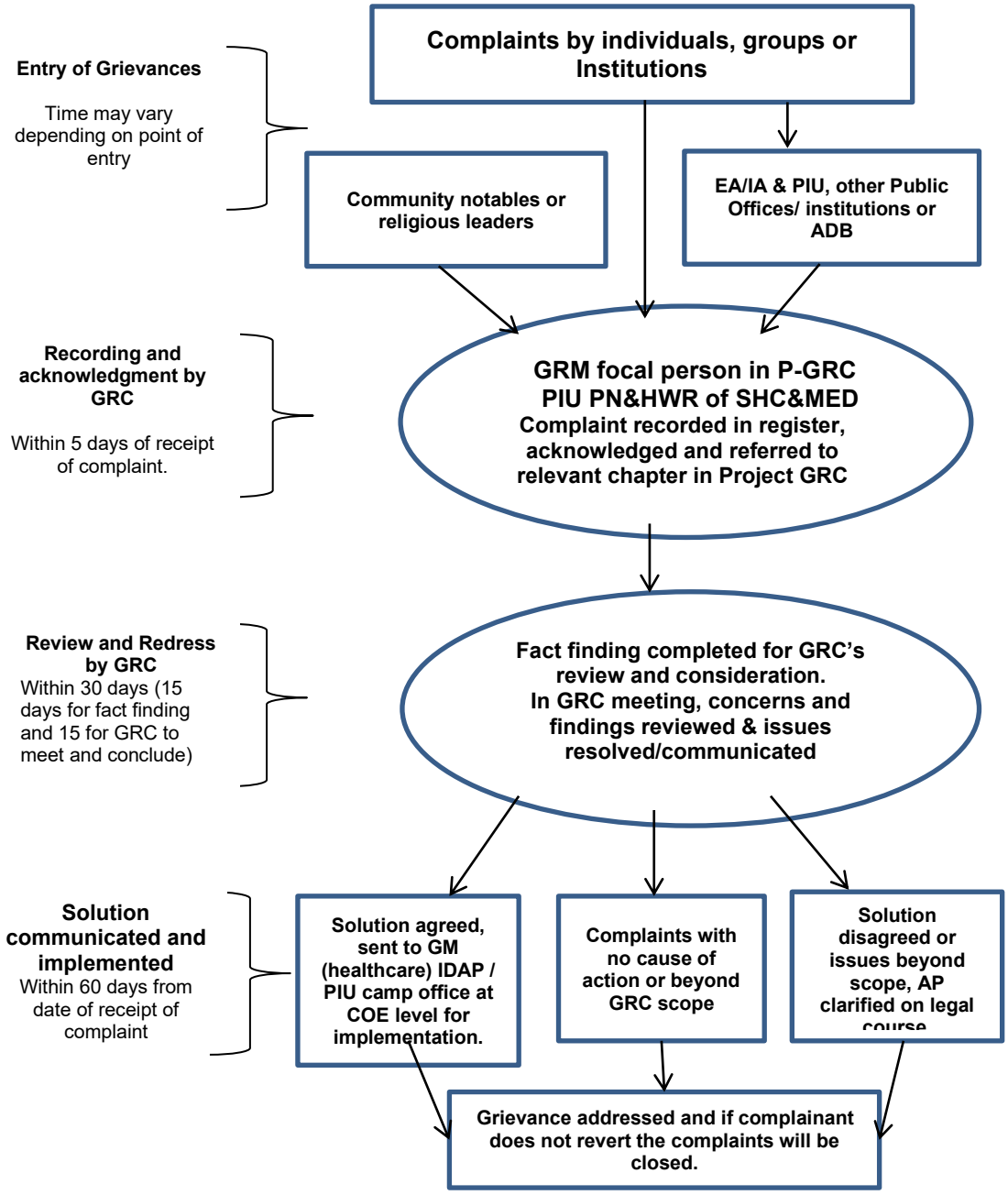
74. **Second Level of GRM—Program level Grievance Redress Committee (GRC):** The Program level GRC is the ultimate level in the program-based GRM to review and resolve the program related grievances. The Program level GRC headed by the Program Manager will be constituted and notified in the PIU for PN&HWR – RBL Program, established by the SHC&MED in Implementing Agency. The P-GRC will include i) Infrastructure Specialist, ii) Financial Expert and iii) Nursing Education Experts of the PIU as its regular members. Whereas the other specialists staff including, Social and Environment Safeguards, Climate, gender and procurement etc. will be the co-opted members of the GRC who can be swapped based on the nature and type of the complaint. The Program Manager, in coordination with regular members of P-GRC, shall nominate a Complaint Receiving Officer (CRO) to serve as the designated focal person. The CRO will be responsible for registering complaints, coordinating and convening GRC meetings, and maintaining comprehensive records of all GRC proceedings. The social safeguards specialist in PIU will be facilitate the GRC for reviewing and redressing the complaints about land acquisition, assessment of IR impacts and matters related to implementation of resettlement plans and construction related social issue. He will maintain an updated record about the registered and resolved complaints related to encountered social safeguard issues.

75. Any complaint escalated to the Program GRC or directly submitted to it for review and resolution will be addressed within 60 days from receiving date of the complaint. The program GRC focal person will log complaint in register and will assist the program manager to acknowledge the complainant within 5 days of receipt of the complaint. After initial review and conducting fact finding of the issues raised in complaint, the Program GRC will coordinate with the relevant experts and authorities in the implementing Agency, implementing partner and the execution agency to deliberate on the plausible solutions for redressing the grievance. After due scrutiny, investigation of facts and providing a personal hearing for recording views of the aggrieved person, the P-GRC will conclude and communicate its decision to the aggrieved persons/parties. If the aggrieved persons/parties agree with the decision of P-GRC, it will be implemented, and the complaint will be closed as resolved. If the aggrieved person/party is not

satisfied with the decision, he will be on liberty to elevate the issue to the respective court of law and or ADB's Accountability Mechanism. A sequential diagram showing the grievance flow process and timelines to resolve grievances by the program GRC at PMIU/PIU level is presented in Figure 6 below.

76. **Grievance Recording and Reporting.** The COE Level and Program Level GRC will maintain a system for the recording of queries, suggestions, and grievances of the affected persons. All queries, suggestions, and grievances as well as resolutions thereon will be documented, and the record will be maintained for review and subsequent monitoring. The progress on the complaints will be communicated to the IA and EA for their review on a monthly basis or as and when it is required. The IA will ensure that a fully operational GRM is available at PIU and COE levels for smooth and hassle-free handling and redress of complaints.

Figure 6. Grievances flow with timelines and redress system for P-GRC at PIU in SHC&MED



Source: :Program documents

VII. COMPENSATION, RELOCATION, INCOME RESTORATION AND FUNDS FLOW

A. Compensation

77. Given the nature of the intervention, land acquisition and physical or economic dislocation of affected persons is unlikely, and it is expected that clearance of available government land may impede access and/or interrupt third part land uses rights either formal (legal or legally recognizable) and/or informal (non-titled land uses by encroachers/squatters). The EA/IA will ensure that all impacts and relevant affected persons s losing access to land uses and their established assets are fully documented in the relevant RPs and compensated as per provisions of this RF. The compensation for acquired assets will be on replacement cost bases and all the affected people including legal titled asset owners or those with established formal or informal use rights. Unavailability of formal title will not be bar to compensation under the provisions of this RF, however, the affected persons without land title will be compensated for their affected assets other than land only.

B. Income Restoration

78. The income losses accruing to affected persons due to lost assets will be compensated to offset adverse impacts on their income and ensure their living standards are maintained if not improved. The EA/IA will assess the lost income due to involuntary acquisition of assets or involuntary restriction on use of assets or resources during execution of the program. Affected assets used as income/livelihood source including arable land, business and commercial structures and entitled affected persons facing income losses will be documented and income restoration provisions with entitled allowances will be incorporated in the respective RPs. In case of land-based livelihood losses, identification and provision of alternate lands with secure tenure basis to the affected APs irrespective of the land and land use titles will be explored.

79. To offset impacts for lost income from affected business/commercial structures, income losses (if any) will be determined and paid as one-time allowance calculated following tax declaration and other available record or calculated based on minimum wage rate announced by the Government of Pakistan if income is undocumented and tax records are unavailable. In addition to provisions for compensating lost income, an income restoration plan including training on skill development and financial support measures to assist APs in adopting alternative income sources will be considered and included in the RPs. Such skill development and income restoration measures will be based on consultations with affected communities and relevant stakeholders.

C. Relocation and Resettlement

80. Given the project interventions, project impacts are merely perceived to restrict land use to the extent of small land parcels required for construction of school buildings. Mass relocation or resettlement of affected communities is not envisaged under the project at this preliminary stage, but it is likely that the AHs/ affected persons may require shifting of their salvaged material and belongings out of the project school land. Costs incurred to relocate affected assets, belongings and salvaged material out of the project location will be documented and compensated for according to the provisions of the RP.

81. **Flow of Funds for RP Implementation.** The Government of Punjab (GoP) will finance the IR cost. The executing agency (SHC&MED) will coordinate with the Finance Department for

timely allocation and transfer requisite funds to meet PN&HWR – RBL program's IR management costs. The EA through its IA will ensure opening of a project account by the PIU and allocated IR funds will be transferred to the project account at the disposal of the PIU. Since the program implementation will not entail involuntary land acquisition under LAA 1894, so payment of land compensation may be beyond the scope of PN&HWR – RBL program. Required resettlement costs will be for compensation of non-land assets established on the public land and delivery of entitled allowances for resettlement, rehabilitation and income restoration of the eligible APs provided under the RP provisions following eligibility and entitlement matrix (Table-2) of this RF. Thus, applicable resettlement costs will be placed at the disposal of the program manager of the PIU for disbursement of compensation as per government endorsed and ADB-accepted RP provisions.

VIII. MONITORING, EVALUATION AND REPORTING

A. Overview

82. All RPs will be subject to monitoring to review progress on RP implementation activities, adjust for effective implementation, identify issues of concern, prepare and implement corrective actions if required to meet the objectives of SPS 2009 requirements provisions of this RF. Since, the project will not involve land acquisition and only a few APs are expected from each contract package with site-specific impact mostly related to land use restriction under the project. Internal monitoring will focus on the progress of clearance of affected assets from government land, full payment to affected persons/AHs, resolution of grievances, if any, and compliance with the overall social safeguards policy. Besides, monitoring may cover the progress on requisite intuitional and timely delivery of inputs related to achieving the RP and project's overall objectives.

B. Monitoring Methodology

83. RP implementation and safeguards management activities for group/s of selected school sites IR risks will be subject to internal monitoring and evaluation. Monitoring will include day to day tracking progress about IR planning and implementation activities including compensation payment progress, consultation and community feedback campaigns launched, resettlement, rehabilitation and income restoration measures implemented, community concerns and grievances recorded and resolved, and corrective actions implemented etc. The PIU will be responsible for internal monitoring and share RP implementation progress and periodic monitoring reports with the EA/IA and the ADB. The PIU safeguards team will review and validate inventory of losses and APs list through consultations with affected persons and DMS of the affected assets before starting the compensation payment process. The APs entitled to compensation will be provided with special IDs for processing and payment of their claims. The validated inventory of losses and affected persons' list will constitute a base line for monitoring of RPs implementation progress and safeguards staff in PIU will maintaining updated IR databases including quantified data on impacted assets including details about type of impacted asset, census details of the affected persons and compensation entitlements with payment progress against the entitlements and payable costs to each affected person, etc. Potential monitoring indicators from which specific indicators can be developed and refined according to the census and ILA are set out in Table 4 below.

Table 4: Potential indicators for internal monitoring

Monitoring Aspects	**Potential Indicators**
Institutional setup and resource allocation.	▪ RP implementation and monitoring institutional setup in place. ▪ Budgeted RP costs released and placed at disposal PIU for implementation of RP. ▪ Grievance redress mechanism established and explained to the affected persons and affected communities. ▪ COE and PIU level GRCs are in place and fully functional and coordinating with local communities and the affected persons.
Delivery of Entitlements	▪ Compensation entitlements disbursed, compared with number and category of losses set out in the entitlement matrix. ▪ Relocation and rehabilitation costs and income restoration support provided as per entitlements and schedule ▪ Social infrastructure and services restored as and where required. ▪ Income and livelihood restoration activities being implemented as set out in the income restoration plan.,
Restoration of living standard and income	▪ Affected structures reconstructed/restored by the AHs at their places of choice outside designated public/government land allocated and reserved for establishing COEs. ROW limits.

	▪ Impacted business structures (if any) removed and constructed on alternative location and business/income activity restored. ▪ Number and percentage of displaced persons covered under livelihood restoration and rehabilitation programs (women, men, and vulnerable groups). ▪ Number of displaced persons including vulnerable engaged on program induced income generating activities and the APs (women, men, and vulnerable groups) who have restored their income and livelihood patterns Percentage of displaced persons who improved their income and living standard (women, men, and vulnerable groups)
Consultation and Grievances	▪ Consultations organized as scheduled including targeted consultation meetings, focus group discussion and community meetings. ▪ RP disclosure and information dissemination activities implemented and assessment of APs' awareness about compensation eligibility and entitlements ▪ Community awareness about grievance redresses mechanisms available to them and the progress on grievance filed by them. ▪ Information on the implementation of special measures for vulnerable groups including Indigenous Peoples (if any).
Communications and Participation	▪ Number of meetings held with local communities to disseminate and disclose information related to the program interventions ▪ Number of meetings held with affected persons (male and female) and vulnerable groups to explain RP provisions, grievance redress mechanism and compensation disbursement mechanism. ▪ Assessment about Level of information communicated—adequate or inadequate and the number of persons (male female) participated such meetings.
Benefit Monitoring	▪ Compared to pre-project situation: ▪ Changes noticed in patterns of occupation and resource use. ▪ Changes observed in cost of living, income, and expenditure patterns.

C. Reporting Requirements and Disclosure of Monitoring Reports

84. The PIU will prepare and submit social safeguards monitoring reports to ADB annually throughout program implementation period. However, the monitoring frequency for the sites involving preparation and implementation of RPs will be aligned to the RP implementation time lines and explained reporting frequency in the respective RPs. So, to that extent the monitoring frequency outlined in the EA endorsed and ADB-accepted RP will be followed. The safeguards staff in PIU will prepare periodic monitoring reports including progress on resettlement implementation, grievance redress and other social issues and corrective actions implemented. The PIU will share safeguards monitoring reports with the IA/EA for review and acceptance before transmitting social safeguards monitoring reports to ADB for review, acceptance and disclosure. Meanwhile for COE sites involving preparation and implementation of RPs, the PIU will also prepare and submit specific RP compliance reports confirming full implementation of RP for IA's/EA's and ADB's review prior to allowing construction works and disbursement of tranche payments for the COE sites noted with IR impacts. All monitoring reports will be disclosed on the websites of IA/EA and the ADB, as and when cleared by ADB.

Appendix I of RF: Salient Features of Pakistan's LAA 1894

Sections of LAA	Salient Features of the LAA 1894
Section 4	The Collector publishes preliminary notification of land acquisition and power for conducting survey. The DPAC assessed costs of land and assets is demanded from the acquiring department.
Section 5	Upon deposit of land cost in treasury, the Collector formally notifies particular land that is needed for public purpose and inquires for objections or concerns from persons interested (Section 5A). (The publication day of this declaration may be considered as the cut-off date).
Section 6	The Collector formally declares government's intent to acquire a particular land for public purpose
Section 7	The Land Commissioner directs the Land Acquisition Collector (LAC) to take orders for the acquisition of specific land.
Section 8	LAC physically marks out, measures and plans the land that is acquired
Section 9	LAC gives notice to all persons interested that the Government intends to take possession of the land and advise them to approach him for any claims for compensation
Section 10	LAC records statements of interested persons in the area of land to be acquired or any part thereof as co-proprietor, sub-proprietor, mortgage, and tenant or otherwise.
Section 11	LAC makes enquiries into the measurements, value and claims and then to issue the final "award". The award includes the land's marked area and the valuation of compensation.
Section 12	LAC gives notice of final award to persons interested in the acquired land.
Section 16	Upon issuance of award under Section 11, the LAC may take possession, and the land shall thereupon vest absolutely in the Government, free from all encumbrances.
Section 17	Emergency clause that allows acquisition of land after 15 days from notification under Section 6 but prior to payment of compensation to persons interested. (Note that this clause will not be applied in any subproject financed under the RBL Program for PN & HWR).
Section 18	In case of dissatisfaction with the award, persons interested may request the LAC to refer the case to the competent court of law for a decision. This does not affect the Government taking possession of land.
Section 23	The following factors are to be considered in determining the compensation amount for acquired land: i) market value of the land, ii) loss of standing crops, trees and structures, iii) any damage sustained at the time of possession, iv) injurious affect to other property (moveable or immoveable) or earnings, v) expanses incidental to compelled relocation of the residence or business, and vi) diminution of the profits between the time of publication of Section 6 and the time of taking possession. A 15% premium is added to the amount in view of the compulsory nature of the acquisition for public purposes.
Section 28	Relates to the determination of compensation values and interest premium for land acquisition.
Section 31	Section 31 provides that the LAC can, instead of awarding cash compensation in respect of any land, make any arrangement with a person having an interest in such land, including the grant of other lands in exchange.
Section 48	It provides that the completion of acquisition is not compulsory and empowers the government to withdraw from the acquisition when possession under section 16 or 17 is not taken. For withdrawal of land acquisition proceedings, the LAC has to pay compensation for damages suffered as a consequence of acquisition proceedings and costs incurred by the owner/interested persons in prosecution of the proceedings under the Act.

Appendix-II: Involuntary Resettlement Safeguard Policy Principles

#	IR Policy Principle
i).	Screen the project early on to identify past, present, and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through a survey and/or census of displaced persons, including a gender analysis, specifically related to resettlement impacts and risks.
ii).	Carry out meaningful consultations with affected persons, host communities, and concerned nongovernment organizations. Inform all displaced persons of their entitlements and resettlement options.

	Ensure their participation in planning, implementation, and monitoring and evaluation of resettlement programs. Pay particular attention to the needs of vulnerable groups, especially those below the poverty line, the landless, the elderly, women and children, and Indigenous Peoples, and those without legal title to land, and ensure their participation in consultations. Establish a grievance redress mechanism to receive and facilitate resolution of the affected persons' concerns. Support the social and cultural institutions of displaced persons and their host population. Where involuntary resettlement impacts and risks are highly complex and sensitive, compensation and resettlement decisions should be preceded by a social preparation phase.
iii).	Improve, or at least restore, the livelihoods of all displaced persons through (a) land-based resettlement strategies when affected livelihoods are land-based where possible or cash compensation at replacement value for land when the loss of land does not undermine livelihoods, (b) prompt replacement of assets with access to assets of equal or higher value, (c) prompt compensation at full replacement cost for assets that cannot be restored, and (d) additional revenues and services through benefit sharing schemes where possible.
iv).	Provide physically and economically displaced persons with needed assistance, including the following: (a) if there is relocation, secured tenure to relocation land, better housing at resettlement sites with comparable access to employment and production opportunities, integration of resettled persons economically and socially into their host communities, and extension of project benefits to host communities; (b) transitional support and development assistance, such as land development, credit facilities, training, or employment opportunities; and (c) civic infrastructure and community services, as required.
v).	Improve the standards of living of the displaced poor and other vulnerable groups, including women, to at least national minimum standards. In rural areas provide them with legal and affordable access to land and resources, and in urban areas provide them with appropriate income sources and legal and affordable access to adequate housing.
vi).	Develop procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement to ensure that those people who enter into negotiated settlements will maintain the same or better income and livelihood status.
vii).	Ensure that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of non-land assets.
viii).	Prepare a resettlement plan elaborating on displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, budget, and time-bound implementation schedule.
ix).	Disclose a draft resettlement plan, including documentation of the consultation process in a timely manner, before project appraisal, in an accessible place and a form and language(s) understandable to affected persons and other stakeholders. Disclose the final resettlement plan and its updates to affected persons and other stakeholders.
x).	Conceive and execute involuntary resettlement as part of a development project or program. Include the full costs of resettlement in the presentation of project's costs and benefits. For a project with significant involuntary resettlement impacts, consider implementing the involuntary resettlement component of the project as a stand-alone operation.
xi).	Pay compensation and provide other resettlement entitlements before physical or economic displacement. Implement the resettlement plan under close supervision throughout project implementation.
xii).	Pay compensation and provide other resettlement entitlements before physical or economic displacement. Implement the resettlement plan under close supervision throughout project implementation.

Appendix- III of LARF: IR and IP Safeguards Screening Form

A. Introduction

1. **IR Risk Screening:** A program/project and/or any of its components/subprojects are assigned an involuntary resettlement category depending on the ***significance*** of the probable involuntary resettlement impacts from i) involuntary land acquisition through expropriation and ii) involuntary restriction of access and use of land and or livelihood sources. Program components/subprojects are categorized as A, B or C depending on the impact significance and number of affected persons that will experience major impacts which is defined as (i) being physically displaced from housing, or (ii) losing 10% or more of productive assets or both. Program components/subprojects that may cause major impacts i.e. physical and/or economical displacement of 200 or more affected persons are considered as IR category A project while the program components/subprojects with IR impacts of less significance are categorized as B and the program components/subprojects without IR impacts are categorized as C for IR requirements. For result based lending (RBL) Program/Project processing modality, the IR category A program component or subproject are not eligible for program/project interventions, so, will be excluded from PN&WHR – RBL program interventions. While for IR category B program components/subprojects detailed safeguards due diligence will be required to avoid and minimize the IR impacts by adopting alternative design solutions and resettlement plans commensurate with the impact significance will be prepared, implemented and monitored in compliance with safeguards requirement-II of ADB's SPS 2009.

2. **IP Risk Screening**: ADB funded programs/projects and/or its components/subprojects are also screened and as A, B or C regarding Indigenous People (IP) depending on the significance of adverse impacts to IPs. Subprojects that will cause significant adverse impacts on customary rights to land/natural resources, socioeconomic status, cultural and communal integrity, health, education, livelihood and social security of IPs are categorized as 'A' while the projects with limited impacts on IP are considered as category B and the subproject where IP impacts are unlikely are placed in category C. Similar to IR category A, the IP category A program components/subprojects are considered ineligible and excluded from the investment under RBL modality. Further review of Punjab's demography confirmed that the IPs are not found in Punjab Province, so the IP safeguards requirements may not trigger due to PN&WHR – RBL program implementation. Anyhow, selection of COE sites will require IP screening to confirm the presence of IPs in surroundings of the vicinity.

3. Initial IR and IP screening of the PN&WHR – RBL program was conducted at an early stage to demonstrate likely impacts, effort and resources required for plaining, preparation and implementation of IR/IP safeguards documents. Follow-up IR/IP impacts screening is required to be done for all selected school sites to identify the school sites with potential IR/IP risks, consider replacement of school sites involving involuntary land acquisition through expropriation and pending legacy issues with other schools free of such encumbrances and carry out detailed assessment of impacts for the selected school sites where avoidance of IR impacts likely from involuntary restriction on access and use of land/income sources is not possible.

B. Instructions

4. The screening checklist below will be used for screening of IR and IP impacts of selected sites for construction of COE for nursing education. The checklists will be completed by through

the Social Safeguards Specialists engaged in PIU established in IA by EA (SHC&MED) for implementing PN&HWR – RBL program. The PIU will share the filled IR/IP screening checklists for IA's/EA's endorsement and transmitting to the ADB's project officer for record and seeking guidance and advice from ADB's safeguards staff regarding additional safeguard diligence including preparation of RPs (if required) commensurate with the impact significance in a manner consistent with ADB's safeguards requirements.

Involuntary Resettlement Impact Screening Checklist for PN&HWR-RBL Program

Involuntary Resettlement Impacts Screening Checklist for PN&HWR-RBL Program		
A: Basis Information about Proposed COE site		
Name of the COE for nursing	-	_____
Name of linked teaching Hospital	-	_____
Site Coordinates	-	N_____ E_____
Location	-	Town/Village: _____
	-	Tehsil _____District_____

B: Assessment of land availability and its ownership status.

2. How much land is owned/occupied by the tertiary care hospital selected as teaching hospital by establishing the COE for nursing education?

_____ Acre,	_____ Kanal	_____Marla

3. How much is covered area of existing hospital building and how much area is vacant and available within the precincts of selected teaching hospital for construction of the COE?

Total covered area: _____square feet.	Total Open area_____ square feet.

4. Is the allocated and occupied land by the hospital owned by the SHC&MED or any other entity of provincial or federal government? Tick mark the relevant.

SHC&MED Owned government land _____	Government Land allocated for other provincial department _____	Land owned/occupied by Federal Government _____

9. In case, vacant land was not available within the periphery of teaching hospital, how the land required for establishing the COE was secured nearby the selected teaching hospital? Tick mark the relevant.

_____: Allocating government land to SHC & MED	_____: Voluntary land donation by community	_____: By acquiring under LAA 1894.

10. Is the allocated government land, donated or acquired land for teaching hospital or medical education facility mutated in the name of SHC&MED or the hospital or other government entity?

. Yes_____, No_____, not known_____

11. If answer to Q-5 is yes, who is the titled owner of land allocated for establishing the COE nursing education in close proximity of teaching hospital? Tick Mark the relevant.

_____: SHC&MED	_____: Other government entity	_____: Teaching Hospital/COE Nursing

12. Is any of the title documents below available which can be presented for confirming claimed land title/ ownership status? Tick Mark the relevant.

_____: Fard-Malkiat/Mutation Certificate.	_____: Sanctioned allocation/allotment.	_____: Executed Donation Deed.	_____:Purchase Registry.

13. Is the pending mutation of land occupied by hospital school is because of the title dispute or unresolved legacy issue? Tick mark the relevant.

_____,: Dispute on land title	_____,: Pending legacy issue	_____: Unknown

C: Probable Involuntary Resettlement Effects (Please elaborate in the Remarks column)	Yes	No	Not Known	Remarks
C-1: Involuntary Acquisition of Land				
1. Will there be land acquisition?				
2. Is the size for required land parcel and site for land acquisition known?				
3. Is the ownership status and current usage of land to be acquired known?				
4. Will easement be utilized within an existing right of way (ROW)?				
5. Will there be loss of shelter and residential land due to land acquisition?				
6. Will there be loss of agricultural and other productive assets due to land acquisition?				
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?				
8. Will there be loss of businesses or enterprises due to land acquisition?				
9. Will there be loss of income sources and means of livelihoods due to land acquisition?				
C-2 Voluntary Donation of Land (Questions below may be responded and elaborated in remarks column in case of voluntary land donation.)				
10, Will the community or land owner household voluntarily donate required land?				
11 Is the community (for communal land type) and/or the joint owners of the titled land support and endorse the donation of land for school purpose?				
12. Is the size of land parcel to be donated and total land owned by the donor Known?				
13. Is the land type and its established usages I,e, (residential/commercial, agricultural or uncultivable waste land) known?				
14. Will the donation of titled land or communal land result in loss of shelter for the donar or any other user of the land to be donated?				
15. Will the land donation result in significant loss of cultivable and productive land that can adversely affect the income and living standard of the donor household?				
16. Will ne donation of and result in loss of crops or other established income sources on the land parcel to be donated?				
17. Will the donated land mutated in the name of the SED and or the School prior to selection of school for any intervention under RRR STEM RBL Program				
C-3: Involuntary Restrictions on Land Use or on Access to Legally Designated Parks/Protected Areas				

18. Will people lose access to natural resources, communal facilities and services?				
19. If land use is changed, will it have an adverse impact on social and economic activities?				
20. Will access to land and resources owned communally or by the state be restricted?				
21. Will the restricted access to and use of communal/state owned land will result in loss of shelter or established productive assets?				

D: Information about tentative number of affected/displaced Persons:
Any estimate of the likely number of persons that will be affected/displaced by the Subproject? *[ ] No [ ] Yes* *If yes, approximately how many? _____Not Applicable _____*
Are any of them poor, female heads of households, or vulnerable to poverty risks? *[ ] No [ ] Yes*
Are any displaced persons from indigenous or ethnic minority groups? *[ ] No [ ] Yes*

E: Recommended and **Approved**		
Prepared by: **Safeguards Specialist** **PIU for PN&HWR-RBL program** **Date:_____**	**Recommended by:** **Program Manager** **PIU PN&HWR-RBL program** **Date:_____**	**Confirmed /Endorsed by IA. i.e. Project Director** **PMU, SHC&MED** **Date:_____**

Appendix- IV of RF: Outline of a Land Acquisition and Resettlement Plan

This outline is part of the Safeguard Requirements. A RP is required for all projects with involuntary resettlement impacts. Its level of detail and comprehensiveness is commensurate with the significance of potential involuntary resettlement impacts and risks. The substantive aspects of the outline will guide the preparation of the RP.

I. Executive Summary

This section provides a concise statement of project scope, key survey findings, Entitlements and recommended actions.

II. Project Description

This section provides a general description of the project, discusses project components that result in land acquisition, involuntary resettlement, or both and identify the project area. It also describes the alternatives considered to avoid or minimize resettlement. Include a table with quantified data and provide a rationale for the final decision.

III. Scope of Land Acquisition and Resettlement

This section:

- Discusses the project's potential impacts, and includes photographs of the areas or zone of impact of project components or activities;
- Describes the scope of land acquisition and explains why it is necessary for the main investment project;
- Summarizes the key effects in terms of assets acquired and displaced persons; and
- Provides details of any common property resources that will be acquired.

IV. Socioeconomic Information and Profile

This section outlines the results of the social impact assessment, the census survey, and other studies, with information and/or data disaggregated by gender, vulnerability, and other social groupings, including:

- Define, identify, and enumerate the people and communities to be affected;
- Describe the likely impacts of land and asset acquisition on the people and communities affected taking social, cultural, and economic parameters into account;
- Discuss the project's impacts on the poor, indigenous and/or ethnic minorities, and other vulnerable groups; and
- Identify gender and resettlement impacts, and the socioeconomic situation, impacts, needs, and priorities of women.

V. Information Disclosure, Consultation, and Participation

This section:

- Identifies project stakeholders, especially primary stakeholders;
- Describes the consultation and participation mechanisms to be used during the different stages of the project cycle;
- Describes the activities undertaken to disseminate project and resettlement information during project design and preparation for engaging stakeholders;

- Summarizes the results of consultations with affected persons (including host communities), and discusses how concerns raised and recommendations made were addressed in the resettlement plan;
- Confirms disclosure of the draft resettlement plan to affected persons and includes arrangements to disclose any subsequent plans; and
- Describes the planned information disclosure measures (including the type of information to be disseminated and the method of dissemination) and the process for consultation with affected persons during project implementation.

VI. Grievance Redress Mechanisms

This section describes mechanisms to receive and facilitate the resolution of affected persons' concerns and grievances. It explains how the procedures are accessible to affected persons and gender-sensitive.

VII. Legal Framework

This section:

- Describes national and local laws and regulations that apply to the project and identify gaps between local laws and ADB's policy requirements; and discuss how any gaps will be addressed.
- Describes the legal and policy commitments from the executing agency for all types of displaced persons;
- Outlines the principles and methodologies used for determining valuations and compensation rates at replacement cost for assets, incomes, and livelihoods; and set out the compensation and assistance eligibility criteria and how and when compensation and assistance will be provided.
- Describes the land acquisition process and prepare a schedule for meeting key procedural requirements.

VIII. Entitlements, Assistance and Benefits

This section:

- Defines displaced persons' entitlements and eligibility, and describes all resettlement assistance measures (includes an entitlement matrix);
- Specifies all assistance to vulnerable groups, including women, and other special groups; and.
- Outlines opportunities for affected persons to derive appropriate development benefits from the project.

IX. Relocation of Housing and Settlements

This section:

- Describes options for relocating housing and other structures, including replacement housing, replacement cash compensation, and/or self-selection (ensure that gender concerns and support to vulnerable groups are identified);
- Describes alternative relocation sites considered; community consultations conducted; and justification for selected sites, including details about location, environmental assessment of sites, and development needs;
- Provides timetables for site preparation and transfer;

- Describes the legal arrangements to regularize tenure and transfer titles to resettled persons;
- Outlines measures to assist displaced persons with their transfer and establishment at new sites;
- Describes plans to provide civic infrastructure; and
- Explains how integration with host populations will be carried out.

X. Income Restoration and Rehabilitation

This section:

- Identifies livelihood risks and prepare disaggregated tables based on demographic data and livelihood sources;
- Describes income restoration programs, including multiple options for restoring all types of livelihoods (examples include project benefit sharing, revenue sharing arrangements, joint stock for equity contributions such as land, discuss sustainability and safety nets);
- Outlines measures to provide social safety net through social insurance and/or project special funds;
- Describes special measures to support vulnerable groups;
- Explains gender considerations; and
- Describes training programs.

XI. Resettlement Budget and Financing Plan

This section:

- Provides an itemized budget for all resettlement activities, including for the resettlement unit, staff training, monitoring and evaluation, and preparation of resettlement plans during loan implementation.
- Describes the flow of funds (the annual resettlement budget should show the budget scheduled expenditure for key items).
- Includes a justification for all assumptions made in calculating compensation rates and other cost estimates (considering both physical and cost contingencies), plus replacement costs.
- Includes information about the source of funding for the resettlement plan budget.

XII. Institutional Arrangements

This section:

- Describes institutional arrangement responsibilities and mechanisms for carrying out the measures of the resettlement plan;
- Includes institutional capacity building program, including technical assistance, if required;
- Describes role of NGOs, if involved, and organizations of affected persons in resettlement planning and management; and
- Describes how women's groups will be involved in resettlement planning and management.

XIII. Implementation Schedule

This section includes a detailed, time-bound, implementation schedule for all key Resettlement and rehabilitation activities. The implementation schedule should cover all aspects of resettlement

activities synchronized with the project schedule of civil works construction and provide land acquisition process and timeline.

XIV. Monitoring and Reporting

This section describes the mechanisms and benchmarks appropriate to the project for monitoring and evaluating the implementation of the resettlement plan. It specifies arrangements for participation of affected persons in the monitoring process. This section will also describe reporting procedures.

Appendix-V or RF. TOR of Social Safeguards Specialist

Terms of References (TORs) for Social Safeguards Specialist

Introduction

Punjab's healthcare system is facing an unprecedented crisis, with an acute shortage of nurses, inadequate infrastructure, and governance challenges that threaten its ability to meet the province's growing health needs. Recognizing the urgent need for structural transformation, the Government of Punjab has prioritized comprehensive health sector reforms, including investments in high-quality medical and nursing education, enhanced workforce governance, and the integration of international best practices into healthcare service delivery. To respond the challenges and address the issue systematically, the Punjab Nursing and Health Workforce Reform Program (PN&HWRP) is designed with the Asian Development Bank's (ADB's) financial assistance through Results-Based Lending (RBL). The key objectives of the program include i) enhancing the quality of nursing education, ii) establishing state-of-art infrastructure and iii) strengthening governance and health workforce management in the Punjab. The program will achieve its objectives through the following outputs:

Output 1: Quality of nursing professionals improved

- Faculty capacity will be enhanced through recruitment, training, and professional development initiatives.
- Updated curriculum standards will emphasize evidence-based practices, digital skills, and climate-related health issues.
- Minimum standards for nursing education facilities will be updated to ensure consistency across institutions.
- Continuing professional development programs will be introduced for practicing nurses to address skill gaps and align with international standards.

Output 2: Climate-resilient and gender-sensitive COEs for nursing education established

- Three COEs will be built in South, Central, and North Punjab, located at Multan, Lahore, and Rawalpindi, respectively. These COEs will feature:
  - State-of-the-art simulation labs, digital libraries, and smart classrooms.
  - Climate-resilient designs, including solar energy systems, natural ventilation, and disaster-resistant structures.
  - Student hostels with secure accommodation and gender-sensitive amenities.
- Existing public sector nursing schools will be linked to the COEs via digital infrastructure and student rotation programs to enhance the quality of training across the province.

Output 3: Governance and management for health workforce strengthened

- A digitized health workforce management system will be developed to enable evidence-based decision-making for recruitment, deployment, and retention.
- Legislation and policies will be introduced to strengthen the governance framework, ensuring alignment with international best practices.
- A dedicated governance unit within SHC&MED will oversee workforce planning, management, and quality assurance.

Implementation arrangements. The executing agency will be the SHC&MED and the implementing agency will be the project implementation unit (PIU) established in in SHC&MED.

Scope of Assignment

The Social Safeguards Specialist will provide her/his assistance to the EA (SHC&MED) and the IA (PIU in SHC&MED in (i) screening and assessment of IR/IP risks and finalizing eligible COE sites for program interventions; ii) preparing, implementing, and monitoring social safeguards-related documents including RPs (as required) and (iii) developing the safeguards management capacity of the IAs and maintain social safeguards-related record and database. The specialist will working with IA will coordinate with the counterpart technical and safeguards staff in implementing partners and other line department to assist EA/IAs in handling of the social safeguards issues and deliver requisite safeguard due diligence documents and monitoring reports as outlined in the PSSA including the RF prepared for the PN&HWR – RBL Program.

Detailed Tasks

a) Screening/assessment of IR/IP risks to shortlist eligible school sites.

The specialist shall:

(i) Assist the IA/EA for IR/IP risk screening and shortlisting of candidate sites eligible for program interventions particularly under output-2 of the PN&HWR – RBL Program.

(ii) Collaborate with the deputed focal persons by the EA for accessing and review of land title documents to confirm the ownership status of earmarked land for establishing COEs at selected locations and identify pending legacy issues and/or title disputes.

(iii) Conduct site visits to confirm and validate availability of vacant and encumbrance free government owned land parcel for establishment of COE for nursing education within the periphery of selected teaching hospital/medical education institute or available government land parcel nearby and guide the IA/EA for avoiding sites involving involuntary acquisition of land including significant IR impacts, pending legacy issues, title disputes

(iv) Collaborate with EA's focal persons and hospital management for exploring and documenting possibility of securing land needed for establishing COE through voluntary donation as community contribution for planned program activities.

(v) Identify the risk of involuntary resettlement due to restriction of access and/or third-party use of school land and or from donation of communal or titled land.

(vi) Prepare and submit the social safeguards screening checklists (template included in the RF appended with the PSSA) for selected eligible COE sites with or without IR impacts.

(vii) Assist the IA/EA in establishing fully operational two-tier program -based GRM at EA/IA level (in PIU for PN&HWR– RBL program) and the COE Level (in camp office of the implementing partner for each COE site).

(viii) Facilitate the IAs in tracking of complaints, conduct field investigations and redressing social safeguards-related complaints/grievances tendered by the affected people.

b) IR impact assessment, preparation, implementation and Monitoring of RPs.

For selected sites involving minor IR impacts due to involuntary restriction of access and use of school land, the safeguards specialist will:

(ix) Conducted detailed impacts assessment, census and socioeconomic surveys to document the inventory of lost assets and income sources linked with the affected people.

(x) Conduct meaningful consultations with the affected people and other stakeholders including the local community, community-based organization and the government departments involved in IR assessment and asset valuation etc.
(xi) Determine eligibility and compensation entitlements, compensation cost (on replacement cost basis) for affected assets and prepare the Resettlement plan by following the template provided as Ananex-1V of the EA endorsed RF.
(xii) Assist the IA/EA in announcement of cut-off date for compensation eligibility under the RP and endorsement of RP to ADB for review and concurrence.
(xiii) Assist the IA/EA in responding the ADB's comments and disclosure of government endorsed and ADB-accepted RPs
(xiv) Track and monitor RP implementation and include implementation results in periodic progress reports for IA/EA, and ADB project team.
(xv) Consolidate and deliver social safeguards monitoring reports annually or as committed in the approved RPs if it is otherwise.
(xvi) Maintain the RP database and support the database management setup in EA/IA for uploading it in centralized database of the EA.

C. Capacity Development of the IDAP's / IA's focal points at each COE camp office/ site

(xvii) Prepare information, communication, consultation and monitoring tools and provide training to the technical and social safeguards focal staff involved in execution of the project.
(xviii) Organize and facilitate training program for better understanding of the IA/EA and its implementing partner's key staff about the ADB's social safeguards policy requirements, assessment and handling IR risks and construction related social issues.
(xix) Provide guidance and hands-on capacity development and on-job training to the staff deployed by implementing partner in its camp offices for each COE site.
(xx) Document training reports and share with participants and report capacity building activities in periodic reports.

Qualifications

- Master's degree in social sciences, environmental sciences or other relevant fields.
- At least 10 years post qualification experience in social development with more than 05 years work experience as social safeguards/Resettlement Specialist.

Skills

- Strong understanding on social inclusivity and community engagement in the context of resettlement planning and social safeguards management for development projects.
- Expertise in screening and assessment of social safeguards risks and adaptation of mitigation measures to avoid and minimize the impacts by exploring alternative sites and/or design solutions.
- Strong analytical approach and excellent communication, collaboration, and stakeholder engagement skills, with the ability to influence diverse groups

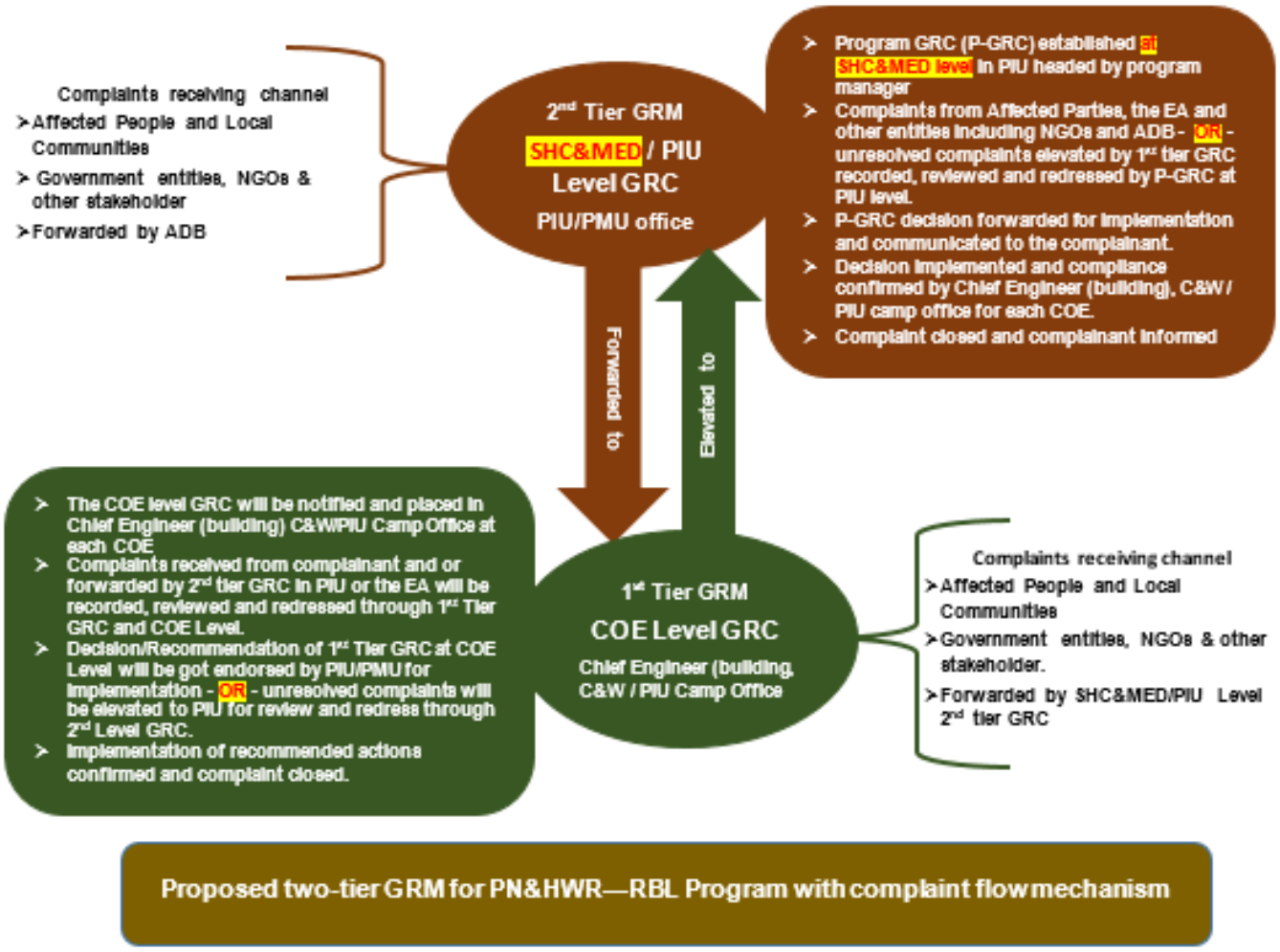
Person-months

60 Person Months (may be extended depending on extension of loan closing timeline)

Intermittent or continuous

Continuous

ANNEX 8: PROPOSED TWO-TIERED GRM PROCESS FOR PN&HWR – RBL PROGRAM



Proposed two-tier GRM for PN&HWR—RBL Program with complaint flow mechanism

Grievances flow with timelines and redress system for P-GRC at PIU for SHC&MED

