

**Islamic Republic of Pakistan
Government of Sindh**

**SECOND KARACHI WATER AND SEWERAGE
SERVICES IMPROVEMENT PROJECT (KWSSIP-2)
P171422**

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

31 October 2024

Second Karachi Water and Sewerage Services Improvement Project – KWSSIP-2
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Sindh – GoS (the Project Implementing Entity) will implement the Second Karachi Water and Sewerage Services Improvement Project – KWSSIP-2 (the Project), with the involvement of the Karachi Water and Sewerage Corporation (KWSC), as set out in the Loan Agreement and the Project Agreement. The International Bank for Reconstruction and Development (the Bank) has agreed to provide financing for the Project, as set out in the referred agreement(s).
2. The GoS shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Loan Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the GoS shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement with the Bank.
4. As agreed by the Bank and the GoS, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the GoS through KWSC and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the GoS through the Project Director of KWSC. The GoS shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the project Grievance Redress Mechanism (GRM)</p> <p>A K-IV Coordination and E&S Implementation Committee shall be formed comprising of the managers of the four major pieces of infrastructure (KBFU, K-IV Main Phase 1, K-IV Augmentation Phase 1 and Power Transmission of 50 MWs) to continue monitoring and reporting on the E&S implementation and on construction/rehabilitation progress on a quarterly basis. This committee shall report on the i. monitoring of Keenjhar Lake water balance, ii. E&S review including Gap Analysis and Corrective Actions iii. Corrective Action Plan - Resettlement (CAP-RP), iv. E&S assessment implementation of power transmission line of K-IV, and; v. LARP development and implementation for power transmission line of K-IV.</p>	<p>Submit quarterly reports to the Bank throughout Project implementation, commencing after the Effectiveness Date. Submit each report to the Bank no later than 15 days after the end of each reporting period.</p> <p>Ensure the committee is in place prior to project effectiveness.</p> <p>Quarterly reporting with flexible periodicity of reporting based on compliance and status of reported grievances.</p>	<p>Project Director (PD), Environment and Social (E&S) Team (including Senior Environmental, Senior Social, Senior Gender and Occupational Health and Safety Specialists and field staff comprised of two Environmental and two Social Specialists) in the Project Implementation Unit (PIU)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p>	<p>Notify the Bank no later than 24 hours after learning of the incident or accident.</p> <p>Provide subsequent reports to the Bank: initial report within 2 days and detailed report within 10 days.</p>	<p>PD, E&S Team in the PIU</p>

	Subsequently, at the Bank’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.		
C	CONTRACTORS’ MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank on a quarterly basis.	Submit the monthly reports to the Bank upon request as annexes to the reports to be submitted under action A above.	PD, E&S Team in the PIU
D	NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS Notify the Bank of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Association of: (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.	No later than 5 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).	PD KWSSIP
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE 1. In addition to maintaining the existing one Environmental Specialist, 1 Social Development Specialist, and one Gender Specialist for KWSSIP-1, recruit additional positions as part of the PIU as follows: a. One Senior Environmental Specialist, one Senior Social Development Specialist. b. One OHS specialist, one Senior Gender Specialist and four field E&S staff, i.e., two Environmental Specialist and two Social	1a. These two positions will be in place prior to project effectiveness. 1b. These six positions will be in place within three months of Project Effectiveness. 2. All the institutional arrangements required for	1. PD KWSSIP

	<p>Specialists, as part of the KWSSIP PIU.</p> <p>2. Establish permanent E&S cell in KWSC with clear mandate and appropriate E&S organizational structure and personnel including E&S Director, ESHS specialists, support staff and required permanent arrangements.</p>	<p>an effective E&S Cell should be in place within 1 year of effectiveness of the project. The E&S cell will include permanent staff as part of the KWSC structure and thereafter maintain these positions throughout Project implementation.</p>	<p>2. CEO/MD KWSC</p>
<p>1.2</p>	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. The EMF and SMF already prepared (covering both KWSSIP 1 and KWSSIP 2) will remain applicable for the purposes of screening of unidentified sub-projects and activities.</p> <p>2. The following instruments have been prepared consulted and disclosed by the project:</p> <p>a. <u>ESIAs</u></p> <p>i. (ESIA) for K-IV Augmentation subproject (construction of three water supply conveyance in Karachi), consistent with the relevant ESSs.</p> <p>ii. ESIA for Construction of Malir Basin Wastewater Interceptors and Treatment Plant (TP-IV) subproject, consistent with the relevant ESSs.</p> <p>b. <u>ESMPS</u></p> <p>i. ESMP for Rehabilitation and Reconstruction of Existing Water Treatment Plants. - ESMP for Priority Water Network Rehabilitation and Extension including installation of Meters / DMAs and Additional Chlorination Facilities (sub-component 2.3) -ESMP for Priority Sewer Network Rehabilitation and Extension (sub-component 2.2) -ESMP for Reducing Energy Consumption at KWSC Existing Facilities (sub-component 2.4) -ESMP for Improvement of Water Supply and Sewerage networks in Low-Income Communities (sub-component 2.1)</p>	<p>1. Implement the EMF and SMF as and when any yet unidentified sub-projects and activities are known.</p> <p>2. All ESIAs, Site specific ESMPs, SEP, LMP, RAPs and ARAPs have been prepared. The relevant aspects will be included in contractor bidding documents and thereafter implemented as part of the contracts. The Malir Basin ESIA to be updated during project implementation to include the recycling and distribution network.</p>	<p>1. PD, E&S Team in the PIU</p> <p>2. E&S Team of PIU</p>

	<ul style="list-style-type: none"> c. <u>Labor Management Procedures (LMP)</u> d. <u>Stakeholder Engagement Plan (SEP)</u> e. <u>Resettlement Plans:</u> <ul style="list-style-type: none"> i. Corrective Action Plan for K-IV Mainstream ii. Merged RP Malir Basin Wastewater Interceptor and Sewage Treatment Plant (TP-IV) (sub-component 2.7), Priority Sewer Network (sub-component 2,2) and K-IV Augmentation (sub-component 2.5(ii)) iii. Abbreviated Resettlement Action Plan for Low-Income Communities (sub-component 2.1) iv. Land Acquisition & Resettlement Plan (LARP) for the ROW of power transmission line for K-IV f. Prepare a standalone sexual exploitation and abuse and sexual harassment (SEA/SH) action plan. g. Conduct an E&S audit, including any corrective measures, to ascertain and ensure that the works for retroactively financed activities have been and will continue to be carried out in a manner that is consistent with the World Bank ESF requirements and the GoS Resettlement & Rehabilitation policy. h. Conduct annual E&S monitoring of Project activities through an independent monitoring agency or consultants in a manner acceptable to the Bank. 	<ul style="list-style-type: none"> 3. Adopt the SEA/SH action plan prior to the commencement of project activities and implement throughout the project. 4. E&S audit and any relevant corrective measures will be completed before retroactive disbursement of funds. If there are works to be continued and completed for retroactively financed activities, after the retroactive disbursement of funds, the corrective measures shall continue to be implemented throughout the activity implementation. 5. E&S monitoring of the Project activities annually 	
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <ul style="list-style-type: none"> 1. Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts. 	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation and ensure monthly reports from contractors are included as annex to Quarterly Progress Reports from PIU</p>	<p>PD, Procurement Specialist, E&S Team in the PIU</p>

	<p>2. These requirements include, inter alia:</p> <ul style="list-style-type: none"> • Each contractor/bidder will propose an ESHS specialist as the contractor’s key personnel at the site. • All contractors/bidders will submit and then implement the code of conduct that will apply to the contractor’s employees and subcontractors including on SEA/SH. • All contractors will be required to submit for approval and subsequently implement a Contractor’s Environment and Social Management Plan (C-ESMP). • All contractors will be required to comply with the ESHS specifications of their respective contracts. • The contractors/bidders shall submit a Forced Labor Performance Declaration (which covers past performance), and a Forced Labor Declaration (which covers future commitments to prevent, monitor and report on any forced labor, cascading the requirements to their own sub-contractors and suppliers). 		
	<p>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING)</p> <ol style="list-style-type: none"> 1. Ensure that the CERC Manual as specified in the legal agreement includes a description of the ESHS assessment and management arrangements including the CERC-ESMF/ESMF Addendum that will be included or referred to in the CERC Manual for the implementation of the CERC component, in accordance with the ESSs. 2. Adopt any environmental and social (E&S) instruments which may be required for activities under the CERC component, in accordance with the CERC Manual and, and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments. 	<ol style="list-style-type: none"> 1. The adoption of the CERC and, if applicable, other instruments, in form and substance acceptable to the Bank is a withdrawal condition under Section G of Schedule 2 of the legal agreement for the Project. 2. Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation. 	<p>PD, E&S Team in the PIU</p>
1.6	<p>ASSOCIATED FACILITIES</p> <ol style="list-style-type: none"> 1. The below due diligence documents have been prepared for the Greater Karachi Bulk Water Supply Project (K-IV phase 1/K-IV main), 	<ol style="list-style-type: none"> 1. Prior to the start of works on the K-IV Augmentation subcomponent 2.5(ii), ensure the implementation of the Corrective Actions for K-IV 	<p>PD, E&S Team in the PIU E&S Implementation</p>

	<p>an associated facility:</p> <ol style="list-style-type: none"> a. E&S review including Gap Analysis and Corrective Actions for the 110 km water conveyance system. b. Corrective Action Plan - Resettlement (CAP-RP) for water conveyance system. <p>2. The below E&S documents will be prepared for K-IV phase 1/K-IV main power transmission line:</p> <ol style="list-style-type: none"> a. ESIA in line with WB ESF requirements and the local legislation. b. Land Acquisition & Resettlement Plan in line with the provincial R&R policy and ESS 5 of the ESF policy. 	<p>main as provided in the E&S Review Report.</p> <ol style="list-style-type: none"> 2. Prior to commencement of works on K-IV Augmentation subcomponent 2.5(ii), implement the CAP-RP for K-IV main project. 3. Finalize ESIA prior to invitation for bids for EPC contracts of the power transmission line, grid station and allied works; and make the ESIA a part of the bidding documents. 4. Implementation of LARP before commencement of physical work on the power transmission lines. 	<p>Committee</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project during its construction and operational phases, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	<p>Adopt the LMP prior to engaging Project workers, and thereafter implement the LMP throughout Project implementation.</p>	<p>PD, E&S Team in the PIU</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2, having provisions to address labor-related SEA/SH issues including provision of a referral system.</p>	<p>Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	<p>PD, E&S Team in the PIU</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p>		

	Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in LMP, ESIA's and ESMPs prepared under action 1.2 above. In addition, contractors will develop (prior to the start of construction works) and implement a site-specific OHS management plan consistent with measures in the ESMPs developed for the subprojects. The site specific OHS management plan should also include standard operating procedures to address risks related to COVID-19.	Prior to commencement of work and throughout project implementation	Contractors, E&S Team of PIU
2.4	OCCUPATIONAL HEALTH AND SAFETY AWARENESS The Contractors shall develop a training plan and provide training to all their workers, before they start working on site, on basic environment, social, occupational health and safety risks associated with the proposed construction works and the workers' responsibility. The training program shall be repeated every month.	Prior to commencement of work and throughout project implementation	Contractors, E&S Team of PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Adopt and implement Waste Management Plans (WMP) as part of the ESMPs under action 1.2, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Adopt the WMP prior to the mobilization of construction contractors, and thereafter implement the WMP throughout Project implementation.	PD, E&S Team in the PIU, contractors
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT 1. Incorporate resource efficiency and pollution prevention and management measures in the ESIA's and ESMPs prepared under action 1.2 above. 2. A detailed water Balance study has been completed by the client. Increased water delivery to Keenjhar Lake will be realized via the rehabilitation of KBFU canal (either through decreased seepage or increased conveyance) before an equal or lesser amount is withdrawn for K-IV Main/Augmentation. 3. A Keenjhar Lake Conservation Plan (KLCAP) committee will be constituted in accordance with the Ecological Assessment (reference: Table 5-1: KLCAP Actions Implementation Framework)	1. Same timeframe as for the adoption and implementation of the ESIA's and ESMPs 2. Ensure the rehabilitation of KBFU commence prior to the start of construction of K-IV Augmentation subcomponent 2.5(ii). 3. KLCAP Committee constituted and conducted prior to start of K-IV	PD, Procurement Specialist, E&S Team in the PIU, contractors E&S Implementation Committee KLCAP Committee

	and conduction of a Critical Habitat Assessment (CHA).	Augmentation subcomponent 2.5(ii).	
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESIA and ESMPs prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESIA and ESMPs.	PD, E&S Team in the PIU
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESIA and ESMPs prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESIA and ESMPs.	PD, E&S Team in the PIU
4.3	SEA AND SH RISKS Adopt and implement a SEA/SH prevention and mitigation measures included in ESIA and ESMPs to be prepared under action 1.2 above, to manage the risks of SEA and SH.	Adopt the SEA/SH prevention and mitigation measure before engaging the Project workers, and thereafter implement the SEA/SH prevention and mitigation measures throughout Project implementation.	PD, E&S Team in the PIU
4.4	SECURITY MANAGEMENT Prepare standalone Security Risk Management Plan to Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	Security risk management plan to be prepared prior to commencement of project activities and engaging security personnel and thereafter implemented throughout Project implementation.	PD, E&S Team in the PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLANS 1. Adopt and implement the merged RP for Construction of Malir Basin Wastewater Interceptor and Sewage Treatment Plant (TP-IV)(sub-component 2.7), Priority Sewer Network (sub-component 2,2) and K-IV Augmentation (sub-component 2.5(ii), consistent with the ESS5. 2. Adopt and implement the ARAP for Improvement of Water Supply and	1. Adopt and implement the merged RP, ARAP, CAP, LARP for each subcomponent, ensuring that before the mobilization of contractor at the construction site, for that subcomponent, full compensation has been made.	PD, E&S Team in the PIU E&S Implementation Committee

	<p>Sewerage networks in 10 Low-Income Communities subproject (sub-component 2.1), consistent with the ESS5.</p> <p>3. Adopt and implement the Corrective Action Plan (CAP) including Resettlement Plan (RP), as well as the CAP completion audit report for K-IV Mainstream, which is associated facility of K-IV Augmentation subproject (construction of three water supply conveyance in Karachi), consistent with the ESS5.</p> <p>4. Develop and implement the Land Acquisition & Resettlement Plan (LARP) for ROW of power transmission line of K-IV Mainstream, which is an associated facility of the project, consistent with the ESS5.</p> <p>5. Conduct regular monitoring of resettlement activities through an independent monitoring agency or consultants in a manner acceptable to the Bank.</p>	<p>2. Regular monitoring of resettlement activities throughout the Project implementation</p>	
<p>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</p>			
<p>6.1</p>	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Adopt and implement mitigation measures to safeguard biodiversity and habitat included in ESIA's and ESMPs mentioned under action 1.2.</p>	<p>Prior to commencement of activities for subcomponent 2.5(ii) implement the action plan of the Ecological Assessment for Keenjhar lake throughout the project implementation</p>	<p>PD, E&S Team in the PIU</p>
<p>ESS 8: CULTURAL HERITAGE</p>			
<p>8.1</p>	<p>CHANCE FINDS</p> <p>Chance finds procedures have been described as part of the ESIA's and ESMPs of the Project described under action 1.2 above.</p>	<p>Implement the procedures throughout Project implementation.</p>	<p>PD, E&S Team in the PIU</p>
<p>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</p>			
<p>10.1</p>	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement the Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which includes measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	<p>Adopt the SEP before Project effectiveness and thereafter implement the SEP throughout Project implementation.</p>	<p>PD, E&S Team in the PIU</p>

10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Maintain and enhance the established Grievance Redress Mechanism (GRM) to ensure accessibility, transparency, and effectiveness in addressing concerns and grievances related to the Project in a manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>Establish the grievance mechanism prior to the commencement of Project activities, and thereafter maintain and operate the mechanism throughout Project implementation.</p>	<p>PD, E&S Team in the PIU</p>
<p>CAPACITY BUILDING</p>			
CS1	<p>1. The following training will be provided to contractors and project communities</p> <ul style="list-style-type: none"> • Stakeholder Mapping and Engagement • Specific Aspects of Environmental and Social Assessment • Emergency Preparedness and Response • General Environmental and Socio-Economic Awareness • Environmental and Social Sensitivity of the Project Influence Area • Community and Occupational Health and Safety Aspects and Key Risks Including Covid-19 Response. • Risks Hazards Assessments • Kobo Toolbox • Implementation Requirements of OHS Management Plans • World Bank ESF Requirements • Borrower’s National/Provincial Regulatory Requirements • Implementation of ESIA And ESMP • Grievance Mechanism • Environmental and Social Monitoring and Supervision • Gender Sensitivity • Mitigation Against SEA and SH • Case Management of SEA/SH Complaints for GRM Staff • Labor Management • Waste Management and Disposal. • Management of Used Transformer Oil and Hazardous Substances • Security Risk Management 	<p>1. Initiate the training prior to commencement of construction works and thereafter throughout Project implementation.</p> <p>2. During first six months of the Project Effectiveness.</p>	<p>PD, E&S Team in the PIU</p>

	<ul style="list-style-type: none"> • Documentation and Reporting. <p>2. Prepare training material on E&S aspects relevant to KWSC activities including the Project activities.</p>		
CS2	Develop and endorse KWSC’s policy and procedures for E&S management including risks and impacts identification, management plans, monitoring, stakeholder engagement including GRM, and training programs based on the capacity assessment.	To be completed within one year of project effectiveness	KWSC