



## **WATER AND SANITATION AGENCY (WASA) LAHORE DEVELOPMENT AUTHORITY**

**SEWERAGE SYSTEM FROM LARECH COLONY TO GULSHAN-E-RABI IN LAHORE  
(THROUGH TRENCHLESS TECHNOLOGY)**

# **DRAFT STAKEHOLDER ENGAGEMENT PLAN**

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*A Joint Venture*

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## ABBREVIATIONS

AH	Affected Households
AIIB	Asian Infrastructure Investment Bank
AM	Accountability Mechanism
AP	Affected Persons
EA	Executing Agency
EEW	Elevated Expressway
ESF	Environmental and Social Framework
ESHS	Environment and Social Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environment and Social Management Plan
ESP	Environmental and Social Policy
ESS	Environmental and Social Standards
ESU	Environmental and Social Unit
FGD	Focus Group Discussions
GOP	Government of Pakistan
GoPb	Government of Punjab
GRC	Grievances Redress Committee
GRM	Grievance Redress Mechanism
HH	Household
IAS	Impact Assessment Survey
Km	Kilometer
LDA	Lahore Development Authority
LRP	Livelihood Restoration Plan
LESCO	Lahore Electric Supply Company
LTC	Lahore Transport Company
LWASA	Water and Sanitation Agency Lahore
LWMC	Lahore Waste Management Company
LWMMP	Lahore Water and Wastewater Management Project
NTDC	National Transmission and Dispatch Company
MCL	Metropolitan Corporation Lahore
MTBM	Micro Tunnel Boring Machine
PD	Project Director
PED	Preliminary Engineering Design
PEPA	Punjab Environmental Protection Act 2012
PHA	Parks and Horticulture Authority
PID	Punjab Irrigation Department
PMC	Project Management Consultant
PMTA	Punjab Mass Transit Authority
PMU	Project Management Unit
PSCA	Punjab Safe Cities Authority
PTCL	Pakistan Telecommunication Company Limited
RUDA	Ravi Urban Development Authority (RUDA)
SEP	Stakeholder Engagement Plan
SNGPL	Sui Northern Gas Pipeline Limited
Sq. Km,	Square Kilometer
TEPA	Traffic Engineering and Transport Planning Agency
TBM	Tunnel Boring Machine

## **EXECUTIVE SUMMARY**

### **E-1: INTRODUCTION TO STAKEHOLDER ENGAGEMENT**

Lahore Water and Sanitation Agency (LWASA) has initiated a project namely “Lahore Water and Wastewater Management Project (LWWMP)” with the financial assistance of the Asian Infrastructure Investment Bank (AIIB). The project includes constructing advanced trunk sewer systems using trenchless technology. It aims to modernize Lahore's wastewater management by replacing open drains with gravity-based sewers, reducing environmental degradation, and improving public health, with a projected population of 2.35 million by 2050. The project covers an area of 56 sq. km, addressing critical challenges such as groundwater contamination and urban flooding while ensuring cost efficiency through reduced pumping operations. The Stakeholder Engagement Plan (SEP) for this project has been prepared to ensure inclusive and transparent communication with all stakeholders, including affected residents, government entities, and private parties. Guided by AIIB's Environmental and Social Framework (ESF), the SEP involves consultations, focus group discussions, and gender-focused engagements to gather input and address concerns. The plan outlines steps for ongoing consultations, information disclosure, and grievance redress mechanisms to mitigate risks and foster collaboration.

### **E-2: REGULATORY AND INSTITUTIONAL FRAMEWORK**

The Asian Infrastructure Investment Bank (AIIB) emphasizes the importance of transparency and meaningful consultation in its Environmental and Social Framework (ESF), which is crucial for the effective design and implementation of projects. This consultation process is inclusive, ongoing, and culturally appropriate, ensuring that stakeholders' views are integrated into decision-making. The ESF mandates that stakeholder engagement aligns with the potential risks and impacts of projects, particularly in contexts where stakeholders may face threats or retaliation. Additionally, the Environment and Social Policy (ESP) and Environment and Social Standards (ESSs) outline specific actions for stakeholder engagement, including early consultations and support for vulnerable groups, ensuring that all voices are heard in a non-coercive environment.

In Pakistan, both the national and provincial regulatory frameworks reflect a commitment to stakeholder engagement and public participation in development projects. The Constitution of Pakistan guarantees citizens the right to information, reinforced by the Right to Information Act 2017, which promotes transparency across federal entities. The Punjab Transparency and Right to Information Act 2013 further enhances public access to information, fostering accountability and stakeholder involvement in decision-making. The Punjab Environmental Protection Act (PEPA) 2012 mandates public participation in environmental assessments, while the Punjab Local Government Act 2019 empowers local institutions to manage development projects, ensuring community input and alignment with local needs.

### **E-3: STAKEHOLDER ENGAGEMENT APPROACH**

Stakeholder engagement involves proactive communication and consultation between project proponents and those directly or indirectly affected by the project, as well as individuals or groups with an interest in its outcomes. This process fosters constructive relationships by actively listening to stakeholder concerns and feedback, which can significantly enhance the efficacy of project design and implementation. By continuously engaging the stakeholders throughout the project lifecycle, project proponents can identify trends, address challenges, and ensure that stakeholder perspectives are considered in decision-making. The SEP emphasizes making engagement an integral part of the organizational culture, focusing on mutual benefits for both stakeholders and LWASA. A key component of this plan is the

Grievance Redress Mechanism (GRM), which provides a structured approach for addressing and resolving stakeholder complaints and grievances in a timely manner.

#### **E-4: STAKEHOLDER ASSESSMENT**

The Environmental and Social Impact Assessment (ESIA) of the proposed sewerage infrastructure project highlights significant environmental, resettlement, and livelihood impacts across its pre-construction, construction, and operational phases. The project is classified as high-risk (Category "A") by the AIIB's Environmental and Social Policy and requires a detailed ESIA study. Key environmental impacts include odor emissions, air and water pollution, greenhouse gas emissions, and noise during construction, as well as maintenance challenges during operations. Resettlement impacts involve the relocation of government offices and the temporary loss of livelihoods for businesses and workers. Mitigation strategies include protective measures, robust operational protocols, compensation for business disruptions, and the replanting of affected trees. Additionally, gender-specific impacts and participation were addressed through a Gender Action Plan (GAP), emphasizing awareness, skills training, and gender-sensitive grievance mechanisms to ensure equitable benefits for women and vulnerable groups.

Stakeholder consultations formed an integral part of project planning, engaging affected persons (APs), community members, government authorities, and civil society organizations. These consultations revealed concerns about health risks, access disruptions, and business impacts, which were addressed through proposed compensation, safety measures, and traffic management strategies. Gender consultations underscored the importance of targeted communication and the inclusion of women in project benefits. Government stakeholders emphasized timely collaboration to prevent project delays and supported mitigation measures for environmental and social risks. The overall response was positive, recognizing the project's potential to improve sewage management, public health, and environmental conditions in Lahore. Safeguard documents, including ESIA, Resettlement Plan (RP), Livelihood Restoration Plan (LRP), and GAP, provide a comprehensive framework for addressing these challenges and ensuring sustainable outcomes.

#### **E-5: STAKEHOLDER ENGAGEMENT PLAN**

The Stakeholder Engagement Plan outlines a structured, phased approach to involve stakeholders throughout the project lifecycle to address environmental and social risks effectively and enhance project design and implementation. Stakeholder engagement occurs in three phases: project planning and design, information disclosure, and implementation of environmental and social safeguards. During the planning phase, stakeholders such as affected persons, government agencies, and civil bodies participate in consultations, data collection, and feedback to refine project design and identify mitigation measures. The second phase ensures transparency through public disclosure of key documents like ESIA, LRP, GAP, and SEP via websites and awareness-raising sessions. These documents are updated based on stakeholder feedback and disclosed again, ensuring comprehensive community involvement. In the implementation and operational phases, the project emphasizes sustained engagement to maintain transparency, manage grievances, and ensure stakeholder cooperation. A Grievance Redress Mechanism (GRM) will address concerns efficiently, and regular updates will be provided through periodic reports and consultations.

The PMU and PMC are tasked with monitoring, record-keeping, and maintaining a database of engagement activities and grievances. SEP implementation will involve creating information materials, building stakeholder capacity, and monitoring progress against key indicators such as grievance resolution rates. An estimated budget of PKR 2.5 million supports these activities, ensuring effective stakeholder involvement and fostering project acceptance.

## **E-6: GRIEVANCE REDRESS MECHANISM**

The integrated Grievance Redress Mechanism (GRM) is a structured system designed to address and resolve grievances related to the social, environmental, and resettlement aspects of a project. It ensures timely and impartial resolution of complaints, adhering to Asian Infrastructure Investment Bank (AIIB) requirements and international standards. The GRM operates on a multi-tiered system: the first-tier handles grievances at the construction site via a Grievance Redress Cell, the second tier involves a committee at the Project Management Unit (PMU) level, and the third tier escalates unresolved issues to a Grievance Redress Committee chaired by senior officials of the implementing agency, LWASA. The GRM also allows for anonymous complaints and provides a public forum for affected individuals to voice concerns, aiming to resolve issues within defined timeframes at each tier. Public awareness campaigns ensure that stakeholders are informed about the GRM, which addresses issues such as compensation, resettlement, disruptions from construction, and environmental concerns.

The GRM prioritizes transparency, accessibility, and stakeholder protection against retaliation while maintaining detailed documentation of grievances. It integrates a comprehensive tracking system and outlines a grievance resolution process involving investigation, consultation, and corrective measures. Unresolved grievances can escalate to higher administrative authorities or courts of law. Additionally, the AIIB's Accountability Mechanism provides a final avenue for grievances, emphasizing good-faith efforts at the project level before engaging the bank's operations. To bolster effectiveness, the GRM includes measures such as training, public awareness initiatives, and proactive involvement of environmental and social staff, ensuring that grievances are addressed promptly, fairly, and in compliance with legal and institutional frameworks.

# 1 INTRODUCTION

## 1.1 Project Background

Lahore City is bounded on the North and West by Sheikhpura district, on the east by India, on the south Kasur district and River Ravi flows on the northern side of Lahore. The district comprises five sub-administrative units (Tehsils). According to the census 2023, the overall population of the district was 13,004,135 and among them, males were 52.9 percent and 47.1 percent were females. The sex ratio is measured as 112.47. The area of the Lahore district is 1,772 square kilometers (sq. km), which gives a population density of 7,339 persons per square kilometer as compared to 3,566 persons observed in 1998. The average annual growth rate of the population in the district during the inter-census period 2017-2023 is 2.65%.<sup>1</sup>

Lahore is the historic cultural center of the Punjab region and is one of Pakistan's most socially liberal, progressive, and metropolitan cities. Lahore is rapidly urbanizing and transforming into a regional urban hub of key economic (commercial, industrial, and financial) and socio-economic development activities. Lahore WASA (L-WASA) was established in 1976 under Section 10 (2) of the LDA Act 1975 to perform all functions and exercise all authorities regarding water supply, sewerage, and drainage with a mandate to collect from users the charges for services. Lahore WASA is the second largest water and sanitation agency in Pakistan as a monopolist regulator for water supply and sewerage services in the city, operating in an area of more than 350 Sq.km, through approximately 596 tube wells, about 5,826 kilometers (km) of water supply lines, and about 5187 km of sewerage network.

Government of Punjab, through the L-WASA, has planned to implement the project namely the "Lahore Water & Wastewater Management Project (LWMMP)" The project will be financed by the Asian Infrastructure Investment Bank (AIIB) through the Islamic Republic of Pakistan (GOP) and the Government of Punjab (GoPb) on a soft loan facility. The project comprises two phases; Phase I: Sewerage System from Laerch Colony Gulshan-e-Ravi (Through Trenchless Technology). The laying of trunk sewers and construction of ultimate disposal station and Phase II: Construction of Surface Water Treatment Plant at BRBD Canal Lahore.

As per the approved Procurement Plan (PP), there are seven (07) Packages under Three (03) components. The Component and Package wise detail is given in Table 1 provided below.

**Table 1 Detail of the Project as per Procurement Plan**

Sr. No.	Package No.	Executing Agency	Project Title
<b>Component 01 Investment in safe water supply infrastructure</b>			
1	0074-PAK-01	Project Management Unit (PMU) of PID	Construction of New Ravi Syphon, Head Regulator and Escape Channel Structure & Raw Water Intake at BRBD Canal (Irrigation Department)
2	0074-PAK-02	Project Management Unit (PMU) of LWASA	Construction of Surface Water Treatment Plant & Transmission mains and Distribution network
<b>Component 02 Investment for wastewater management</b>			
3	0074-PAK-03	Project Management Unit (PMU) of LWASA	Laying of Sewer line from Larech Colony & Gurumangat Road to Gulshan-e-Ravi (Through Trenchless Technology)
4	0074-PAK-04	Project Management Unit (PMU) of LWASA	Construction of Ultimate Disposal Station at Gulshan-e-Ravi and Allied Works
<b>Component 03 Project management</b>			

<sup>1</sup> Punjab Development Statistics 2023, Bureau of Statistics, Planning and Development Board.



Sr. No.	Package No.	Executing Agency	Project Title
5	0074-PAK-05	Project Management Unit (PMU) of LWASA	Project Management and Supervision Consultant (Water Supply Component), WASA
6	0074-PAK-06	Project Management Unit (PMU) of LWASA	Project Management and Supervision Consultant (Sewerage System), WASA
7	0074-PAK-07	Project Management Unit (PMU) of PID	Detailed Design & Resident Supervision Consultant for Punjab Irrigation Department

Lahore, being the hub of Punjab province's business activities, provides better opportunities and other facilities. It is therefore experiencing a rapid urbanizing trend, and a considerable population of Punjab and other provinces of the country is migrating/settling in Lahore, because of the lack of facilities related to jobs, education, medical, sports, housing infrastructure, water, sewerage and drainage infrastructure, etc., in other smaller towns of the province. This has resulted in a rapid population influx, which is putting huge stress on the existing water supply and sewage infrastructures of Lahore because such existing facilities cannot meet the growing needs and need to be upgraded.

Given the current situation i.e., deterioration of stormwater channels and wastage of limited financial resources because of the year-round pumping of sewage into stormwater drains, which has also become a permanent public nuisance and has caused overall degradation of the environment, the Water and Sanitation Agency (WASA) has decided to connect all the sewerage schemes which are discharging sewage into the stormwater channels with new trunk sewers leading to a new disposal/lift station in the existing Gulshan-e-Ravi disposal station. These trunk sewers will be installed at such depths that all the main sewers of the existing sewerage schemes can be connected to the proposed trunk sewers by gravity. It is also important to lay these trunk sewers at considerable depth using trenchless technology to avoid interference with or damage to the existing shallow-depth water supply lines and sewers as well as to other buried utility services. This pilot project is expected to be replicated in other sewerage zones in Lahore and other cities in Pakistan.

The Sewerage System from Larech Colony to Gulshan-e-Ravi in Lahore City through trenchless technology is conceived because the existing sewerage system comprising secondary and tertiary sewers lacks the trunk infrastructure and the collected wastewater from the existing system is disposed of into open drains (storm water drains) through pumping/lift stations. The proposed project will only cover the laying of primary/trunk sewers which will be integrated with the already laid tertiary and secondary sewers. This will result in restraining the sewerage disposal into the stormwater drains and eliminate pumping/lifting operations, which incur huge recurring costs. The main objective of the project is to provide an improved facility sewage disposal system in Lahore for proper collection, conveyance, and disposal of sewage which will improve the overall environment in the project area.

## 1.2 Project Description

The project comprises two components, including the laying of sewer lines and the construction of a pumping and disposal station at Gulshan Ravi along with restoration of existing outfall drains. Component-I involves:

- i. Line A. laying of sewer 12.30 kilometers from Karachi Phattak to Qartaba Chowk using micro-tunneling and pipe jacking technology.
- ii. Line B. laying of sewer 12.82 kilometers from Guru Mangant Road to Qartaba Chowk using similar technology.
- iii. Line C. laying of sewer 7.25 kilometers from Qartaba Chowk to Gulshan-e-Ravi using similar technology.

The project aims to improve the wastewater management system in Lahore, which currently relies on open drains meant for rainwater to transport bulk wastewater, polluting the nearby River Ravi. The project will assist LWASA in constructing a modern conveyance system by constructing trunk sewers through underground tunneling and the construction of an ultimate pumping and disposal station at Gulshan-e-Ravi in the vicinity of the existing disposal station, which will safely transport domestic sewage, serving a population/beneficiary 1.25 million (projected to be 2.35 million in the year 2050) over an area of about 56 square kilometers in central Lahore. The project area falls in five towns of Lahore district namely Aziz Bhatti Town, Gulberg Town, Gunj Baksh Town, Allama Iqbal Town and Samanabad Town. The construction of a gravity-based transport of wastewater infrastructure will also eliminate the need for intermediate pumping of wastewater at 22 different locations, resulting in cost savings for LWASA in payment of electricity charges. The total length of the sewer to be constructed is about 32.37 kilometers (km), which is divided into three construction legs. The first trunk sewer measuring about 12.30 km will be constructed from Karachi Phattak to Qartaba Chowk, and the second trunk sewer with a length of 12.82 km will cover the sewage flow from Guru Mangant Road to Qartaba Chowk and the third length of 7.25 km will cover from Qartaba Chowk to Gulshan-e-Ravi.

Component II involves construction of an ultimate pumping and disposal station with a capacity of 688 Cusecs at Gulshan-e-Ravi, along with allied works, such as the installation of a SCADA system for gas concentration monitoring in trunk sewers, electromagnetic/ ultrasonic flow rate monitoring system, construction of an outfall channel, restoration and brick-lining of Cantonment Drain and Gulberg Drain, and installation of a rider sewer along Cantonment Drain. An ultimate pumping and disposal station having a capacity of 688 cusecs with 16 pumps at Gulshan-e-Ravi in the vicinity of the existing disposal station will be constructed for the ultimate disposal of sewage to River Ravi. The wastewater will flow out from the disposal station through i) an existing drainage channel of 2 km long falling into the main drain and ii) a second drainage channel falling into other open drains. The first drainage channel required rehabilitation within the channel, while the second drainage channel will be constructed to increase the capacity of flow. The second open drain will also be rehabilitated till the final fall into River Ravi.

The construction of an ultimate pumping and disposal station will serve the purpose of efficiently collecting and treating sewage flow from various disposal stations and sewers. Its primary objective is to ensure proper management of wastewater in the area. The construction of a pumping and disposal station at Gulshan-e-Ravi holds immense significance for Lahore's Water and Sanitation Agency (LWASA).

Currently, Lahore's sewerage system faces multiple challenges, such as inadequate infrastructure and reliance on open drains for wastewater disposal. These issues have resulted in environmental degradation, groundwater contamination, and health hazards for the population residing near the Ravi River. Therefore, the construction of a disposal station becomes crucial in effectively addressing these challenges.

The proposed project will employ the underground tunneling method of construction, a trenchless technique that minimizes excavation. A combination of Micro-Tunneling & Pipe Jacking Technology. Sewer pipes of less than 60" i/d (1500 mm), 60" i/d (1500 mm), 96" i/d (2400 mm), and 140" i/d (3500 mm) would be provided depending upon the sewerage generation and accumulated flows. There will be 82 jacking pits and 83 recipient pits for tunnel boring. Upon completion and diversion of sewage from the surface drains to the newly constructed trunk sewers, the drains in the locality will be rehabilitated and restored. This will enhance the capacity of the surface drainage and provide immense relief from the monsoon-related urban flooding and stagnation of wastewater witnessed in certain areas.

### 1.3 Scope of Stakeholder Engagement Plan

Preparing and implementing environmental and social safeguards documents including Environmental and Social Impact Assessment (ESIA) Livelihood Restoration Plan (LRP) and Gender Action Plan (GAP) requires engagement with multiple and varied stakeholders. These engagements need to be documented to form part of the safeguard documentation. This Stakeholder Engagement Plan (SEP) is prepared to meet AIIB's social safeguards requirement. The document outlines the general principles and collaborative strategy to identify stakeholders for the Project, identify appropriate modes of engagement, and prepare plans for engagement and meaningful consultation throughout the project lifecycle while ensuring transparency. The goal is to improve and facilitate decision-making and create an atmosphere of understanding that actively involves project beneficiaries and other stakeholders and that these groups are provided with sufficient opportunity to voice their opinions and concerns that may influence project decisions.

The SEP will act as a guiding tool and framework for managing engagement between LWASA (Executing Agency) and its stakeholders for the Project. The SEP has been adapted to the nature and scale of the project and its potential environmental and social risks and impacts. It considers the existing institutional and regulatory frameworks/acts of the Government of Pakistan and the Government of Punjab besides responding to AIIB policies related to information disclosure and communication. The SEP will act as a guideline to enable LWASA to systematically carry out socially and gender-inclusive consultations with the stakeholders, to record their views and concerns, and to implement mitigation measures. The plan is aimed at enabling active and meaningful engagement of the stakeholder groups, especially the Affected Persons (APs), and assures disclosure of information promptly. The effective implementation of the SEP will mitigate the risks of poor stakeholder relations, particularly with affected people throughout the project lifecycle. The SEP is a "living" document that will be regularly updated to include and enable documentation of all consultation activities undertaken and proposed (monitoring), and reviews of the appropriateness and effectiveness of methods used in engaging with stakeholders.

### 1.4. Methodology for Preparation of SEP

Preparation of SEP required consultation with potential project stakeholders. Consultations with stakeholders were carried out in the project areas with Affected Persons (APs), residents' general community, and government and private entities. The purpose of these consultations was to assess the potential stakeholder engagement in project planning and implementation. The findings of the consultations are used for the preparation of SEP. Focus Group Discussions (FGDs) were held with APs. Gender consultations were also held. Four consultation sessions are conducted with relevant government departments. PMC also collected data and information from relevant literature for the preparation of SEP. This includes AIIB's Environment and Social Policy (ESP), the legal and regulatory framework of the Government of Pakistan and the Government of Punjab, and reports on stakeholder engagement on similar projects. The information collected through FGDs and literature was reviewed and collated to build this plan.

### 1.5. Structure of SEP

SEP consists of project description and environmental and social impacts, regulatory framework, stakeholder engagement process, stakeholder engagement plan and Grievance Redress Mechanism. The structure of the SEP is as follows.

1. Introduction
2. Regulatory and Policy Framework
3. Stakeholder Engagement Process
4. Stakeholder Engagement Plan
5. Grievance Redress Mechanism

## 2 REGULATORY AND INSTITUTIONAL FRAMEWORK

### 2.1 AIIB Environmental and Social Framework (ESF) Requirements

AIIB's Environmental and Social Framework (ESF)<sup>2</sup> entails that transparency and meaningful consultation are essential for the design and implementation of a project. Meaningful consultation is a process that begins early and is ongoing throughout the project. It is inclusive, accessible and timely, and is undertaken in an open manner. It conveys adequate information that is understandable and readily accessible to stakeholders in a culturally appropriate manner and in turn, enables the consideration of stakeholders' views as part of decision-making. Stakeholder engagement is conducted in a manner commensurate with the risks to, and impacts on, those affected by the project. In the context of a project in which the Bank determines that there are risks of Environmental and Social Framework Vision retaliation against the Project's stakeholders, or other threats to their safety, it seeks to work with the Client so that the Client avoids or minimizes such risks.

AIIB's Environment and Social Policy (ESP) and Environment and Social Standards (ESSs) elaborate actions for stakeholder engagement such as meaningful consultations are undertaken early in the preparation stage of the subproject and are carried out on an ongoing basis throughout the project lifecycle; all parties have a voice in consultation, including national and subnational government, the private sector, nongovernmental organizations and affected people; additional support is provided as needed to ensure participation of women, elderly, young, disabled, minorities, and other vulnerable groups; timely disclosure of relevant and adequate information that is understandable and readily accessible to the people affected; and be undertaken in an atmosphere free of intimidation or coercion. As per ESF, scoping, including stakeholder identification and consultation plan is one of the elements of environmental and social assessment.

### 3.2. National and Provincial Regulatory and Policy Framework

The laws and policies of the Government of Pakistan (GoP) demonstrate commitment to ensure stakeholder engagement, transparency, and public participation in the decision-making processes of development projects across various sectors. Similarly, the Government of Punjab also demonstrates this commitment by promulgating laws and policies to ensure stakeholder engagement, public consultation and information disclosure. The relevant laws are presented in the ensuing paragraphs.

#### 3.2.1. Constitution of Pakistan, 1973

The constitution of Pakistan envisaged the right to information for every citizen. Under the 18<sup>th</sup> Amendment in the Constitution made in the year 2010, section 7, a new article (Article 19A) has been inserted into the constitution w.e.f. April 19, 2010. According to Articles 19 and 19(A) of the constitution of Pakistan, every citizen shall have the right to access to information in all matters of public importance subject to regulation and reasonable restrictions imposed by law. The reasonable restrictions include religious integrity, security or defense of the country, relations with foreign states, public order, decency or morality and contempt of court.

#### 3.2.2. Right to Information Act 2017

Government of Pakistan has promulgated the Right of Information Act 2017 which extends to the whole of the federal government /autonomous bodies/corporations under the federal government. The Act promotes the right to know, and facilitate and encourage, promptly and at the lowest reasonable cost, the disclosure of information. Maintenance of government

<sup>2</sup> *Environment and Social Framework (Amended May 2021), Asian Infrastructure Investment Bank*

records and information by public bodies and its disclosure through standardized procedures is the limelight of this Act.

### **3.2.3. Punjab Transparency and Right to Information Act, 2013**

The Punjab Transparency and Right to Information Act 2013 entails transparency and freedom of information to ensure that citizens have improved access to public information; to make the government more accountable to citizens; to enforce the fundamental right of access to information in all matters of public importance; and, to provide for ancillary matters. The act ensures transparency and accountability in public bodies. It grants citizens the right to access information related to development projects. The act promotes stakeholder engagement by allowing the public to obtain information and participate in decision-making processes. Through this act, the government aims to enhance public awareness and ensure that stakeholders have the necessary information to actively engage in the development of projects.

### **3.2.4. The Punjab Environmental Protection Act 2012**

The Punjab Environmental Protection Act (PEPA) 2012 focuses on environmental preservation and enhancement in the province. The act requires the assessment of environmental impacts associated with development projects. It actively involves the public in reviewing and providing input on environmental assessments. This approach ensures that environmental concerns are taken into account and encourages the participation of stakeholders who are affected by or have an interest in the project's environmental aspects.

### **3.2.5. Punjab Local Government Act, 2019**

The act empowers local government institutions to oversee and manage development projects. The act highlights the importance of stakeholder engagement and community participation. It facilitates public hearings to gather input and feedback from the public, allowing them to voice their concerns and suggestions. By involving relevant stakeholders in decision-making processes, the act ensures that development projects are aligned with the needs and aspirations of the local communities.

### 3 STAKEHOLDER ENGAGEMENT APPROACH

#### 3.1 Overview

Stakeholder engagement is the process whereby those who are project proponents/ developers communicate and consult with those who are directly and indirectly affected/stakeholders by the project and those who may have an interest in it or have the ability to influence the Project, either positively or negatively. An effective stakeholder engagement helps to develop constructive and productive relationships with the stakeholders of the project. Listening to stakeholders' concerns and feedback is a valuable source of information that can be used to improve project design and outcomes, and helps to identify and monitor trends, challenges, and perceptions over time with specific groups of stakeholders. It also helps to address the concerns of the stakeholders in a timely fashion.

The SEP commits to actively, inclusively, and continuously engage stakeholders throughout the lifecycle of the project. The ultimate goal of SEP is thus to make stakeholder engagement an integral part of long-term planning in terms of processes and culture of LWASA where feedback would be actively sought and translated into policy and service improvements, and effective environment and social management, that would mutually benefit the stakeholders and LWASA. An integral part of the SEP is the Grievance Redress Mechanism (GRM) which would ensure that LWASA can timely and effectively ensure the resolution of stakeholder complaints and grievances.

#### 3.2 Objectives

The aims and objectives of the SEP

- Identification and analysis of stakeholder groups and their profiles, interests, issues, environmental and social impacts, and concerns related to the project;
- Ensure that specific and significant measures are taken to allow for meaningful engagement with different stakeholder groups in a manner that is transparent, efficient, accessible, and culturally appropriate, with a specific focus on affected people and particularly the vulnerable;
- Ensure that the relationship between LWASA and the stakeholders is built on mutual trust and respect;
- Ensure facilitation of timely and adequate dissemination of information to the stakeholder groups in a culturally appropriate, socially and gender inclusive manner;
- Provide systems for prior disclosure, dissemination of information, and consultation, including seeking inputs from affected people, incorporating of environmental and social mitigation measures and improving services based on the inputs provided, and ensuring that information is provided to the affected persons/groups on whether and how the input has been incorporated;
- Provide a mechanism for documentation of feedback, complaints and grievances of the project activities to ensure complaints and grievances are being effectively redressed, and reporting and monitoring of the mechanism;
- Timely communication of the results of GRM to the affected people and other stakeholders.

#### 3.3 Principles

Stakeholder Engagement will be free of manipulation, interference, coercion, and intimidation, and the basis of timely, relevant, understandable, and accessible information, in a culturally appropriate, gender and socially inclusive manner. It involves interactions between identified groups of people and provides stakeholders with an opportunity to raise their concerns and opinions (e.g., by way of meetings, surveys, interviews, and/or focus groups), and ensures

that this information is taken into consideration when making project decisions. The SEP is based on the principles of relevance, social and gender inclusiveness, accessibility, transparency, contribution, benchmarking, and accountability. Specifically, common principles based on International Best Practice include the following:

- All stakeholders belonging to any group will be recognized and engaged, the identified stakeholders are diverse in terms of education, access to print and electronic information, geographical location (urban and rural), language, and needs.
- It is neither necessary nor practical to engage with every stakeholder with the same intensity, the level of engagement would thus be determined by the importance and relevance of the stakeholder groups;
- Commitment is demonstrated when the need to understand, engage, and identify the community/stakeholders, particularly the affected persons is recognized and acted upon early in the process;
- Integrity occurs when engagement is conducted in a manner that fosters mutual respect and trust;
- Respect is created when the rights, cultural beliefs, values, and interests of stakeholders and neighboring communities are recognized;
- Transparency is demonstrated when community concerns are responded in a timely, open, and effective manner;
- Inclusiveness is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- Trust is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values, and opinions.
- Provide appropriate means to the stakeholders to register grievances and all grievances are to be recorded and investigated, and appropriate actions to be taken, irrespective of the nature or severity of the grievance;
- Either a grievance is not eligible for further consideration —whether corrective action is required/taken or LWASA decides no action is merited—the outcome is to be communicated to the aggrieved party;
- The stakeholder engagement is benchmarked against achievable targets so that the performance and effectiveness of the stakeholder engagement can be measured;
- Given a person having a grievance against LWASA or project is not satisfied with the response of LWASA, s/he would have a right to be heard at a higher administrative level which would have the power to ask LWASA to take appropriate corrective measures and the aggrieved parties would also have a right to seek the resolution through the court of law.

### **3.4 Identification of Stakeholders**

Stakeholder engagement for the project entails the involvement and collaboration of individuals, groups, or organizations affected by or interested in the project. Keeping into consideration the project interventions, LWASA has identified stakeholders in two categories namely primary and secondary. Affected Persons including business holders having disruption in their businesses due to construction activities, households and sensitive entities bearing access issues, women, vulnerable groups and the general community are the primary stakeholders of the project. LWASA being the executing agency also falls in the category of primary stakeholders. Lahore Development Authority (LDA) and Housing Urban Development and Public Health Engineering Department (HUD & PHED), Planning and Development Department (P&DD) have a role in project approval and oversight hence considered as primary stakeholders.

The project involves the construction of trunk sewers on the existing roads where services of various entities exist which would be affected due to project construction. These entities

include Sui Northern Gas Pipeline Limited (SNGPL), Punjab Safe Cities Authority, Punjab Mass Transit Authority (PMA), Lahore Electric Supply Company (LESCO), National Transmission and Dispatch Company (NTDC), Pakistan Telecommunication Company Limited (PTCL), Traffic Engineering and Transport Planning Agency (TEPA), Metropolitan Corporation Lahore (MCL) Parks and Horticulture Authority (PHA). These are secondary stakeholders. City Traffic Police Punjab, Lahore Waste Management Company (LWMC), Irrigation Department, Archeology Department, Environment Protection & Climate Change Department, Lahore, Parks and Horticulture Authority (PHA), Ravi Urban Development Authority (RUDA), Fisheries Department, Railways, non-governmental and research organizations are the other secondary stakeholders having information sharing stake.

### 3.5 Stakeholders Analysis

The stakeholder analysis determines the likely relationship between stakeholders and the project and thereby helps to identify the appropriate methods of consultations and information disclosure to the stakeholder during the life of the project. The stakeholders are classified in terms of the degree of engagement, level of engagement, relevance, and potential engagement. The stakeholder analysis is presented in Table 2.

**Table-2 Stakeholder Analysis**

Sr. No.	Stakeholder	Degree of Engagement	Level of Engagement	Relevance	Potential Engagement
<b>A</b>	<b>Government of Punjab</b>				
1	Lahore Water and Sanitation Agency (LWASA)	High	High Effect High Influence	Interest Based	Being the implementation agency responsible for the preparation and implementation of the Stakeholder Engagement Plan (SEP), and Grievance Redress Mechanism (GRM) for the project besides environmental and social safeguards
2	Lahore Development Authority (LDA)	High	High Effect High Influence	Interest Based	Project oversight concerning other development projects
3	Housing Urban Development and Public Health Engineering Department (HUD & PHED)	Medium	Moderate Effect Moderate Influence	One of the project stakeholder	Project approval and monitoring and evaluation of the project.
4	Planning and Development Department (P&DD)	Moderate	Moderate Effect Moderate Influence	Interest Based	Project approval and monitoring and evaluation of the project.
5	Sui Northern Gas Pipeline Limited (SNGPL)	High	Moderate Effect Moderate Influence	the project stakeholders	Information sharing in the planning and implementation phases of the project to avoid damage to existing services. L-WASA is in close coordination with SNGPL in terms of any conflict between the sewer lines and the SNGPL lines. The process of obtaining NOC has already been initiated.



Sr. No.	Stakeholder	Degree of Engagement	Level of Engagement	Relevance	Potential Engagement
6	Punjab Safe Cities Authority	Moderate	Moderate Effect Moderate Influence	Information Based	Information sharing in the planning and implementation phases of the project to avoid damage to existing services.
7	Punjab Mass Transit Authority (PMA)	High	Medium to Moderate Effect Moderate Influence	the project stakeholders	Information sharing in planning and implementation phases of the project to avoid damage to existing services.
8	Lahore Electric Supply Company (LESCO)	High	Medium to Moderate Effect Moderate Influence	the project stakeholders	Information sharing in the planning and implementation phases of the project to avoid damage to existing services.
9	Pakistan Telecommunication Company Limited (PTCL)	High	Moderate Effect Moderate Influence	the project stakeholders	Information sharing in the planning and implementation phases of the project to avoid damage to existing services.
10	Traffic Engineering and Transport Planning Agency (TEPA)	Moderate	Moderate Effect Moderate Influence	the project stakeholders	Information sharing in the planning and implementation phases of the project to avoid damage to existing services.
11	City Traffic Police Punjab	High	Medium to Moderate Effect Moderate Influence	the project stakeholders	Information sharing in the planning and implementation phases for traffic management during project construction
12	Lahore Waste Management Company (LWMC)	Moderate	Moderate Effect Moderate Influence	Information Based	Information sharing in the planning and implementation phases for solid waste management for the project
13	Metropolitan Corporation Lahore (MCL)	Moderate	Moderate Effect Moderate Influence	the project stakeholders	Information sharing in the planning and implementation phases of the project to avoid damage to existing services.
14	Irrigation Department	Moderate	Moderate Effect Moderate Influence	Information Based	Information sharing in the project's planning and implementation phases for water bodies' protection.
15	Archeology Department,	Moderate	Moderate Effect Moderate Influence	Information Based	Information sharing in the planning and implementation phases of the project to avoid damage to archeological sites
16	Environment Protection & Climate Change Department, Lahore	High	Moderate Effect Moderate Influence	the project stakeholders	Information sharing in the planning and implementation phases of the project for the protection of the environment
17	Parks and Horticulture Authority (PHA)	Moderate	Moderate Effect Moderate Influence	Information Based	Information sharing in the planning and implementation phases of the project to avoid damage to green belts

Sr. No.	Stakeholder	Degree of Engagement	Level of Engagement	Relevance	Potential Engagement
18	Ravi Urban Development Authority (RUDA)	Low	Low Effect Low Influence	Information Based	Information sharing in the planning and implementation phases of the project in case of overlap in services
19	Fisheries Department	Low	Low Effect Low Influence	Information Based	Information sharing for the protection of aquatic life.
20	Railways Department, Lahore	Low	Low Effect Low Influence	Information Based	Information sharing in the planning and implementation phases of the project for assistance in providing space for construction sites
21	National Transmission and Dispatch Company (NTDC)	Low	Low Effect Low Influence	Information Based	Information sharing in the planning and implementation phases of the project for assistance in the relocation of services
<b>B</b>	<b>Project Affected Persons and Community</b>				
22	Affected Persons due to livelihood disruption (business holders)	High	High Effect High Influence	Interest Based	Consultation and information sharing on safeguards documentation, compensation disbursement and GRM
23	Affected households due to access disruption	High	High Effect High Influence	Interest Based	Consultation and information sharing on safeguards documentation and GRM
24	Women groups in project areas	High	High Effect High Influence	Interest Based	Consultation and information sharing on safeguards documentation and GRM. Providing training to women.
25	Vulnerable groups in project areas	High	High Effect High Influence	Interest Based	Consultation and information sharing on safeguards documentation and GRM
<b>C</b>	<b>Non-Government and Academia</b>				
26	Non-Governmental Organizations	Low	Low Effect Low Influence	Information based	Consultation on good practices, lessons learned on social and environmental safeguards
27	Academic and Research Institutions	Low	Low Effect Low Influence	Information Based	Consultation on good practices, lessons learned on social and environmental safeguards

## 4. Stakeholder Assessment

### 4.1. Key Stakeholder Engagement Aspects

#### 4.1.1. Environmental Aspects

As per AIB's Environmental and Social Policy, the project is classified as Category "A" and necessitates an ESIA study, meaning that there is a high probability of severe negative environmental and social repercussions that are irreversible, cumulative, diverse, or unprecedented. Likewise, by Pakistan Environmental Regulation-2022's Initial Environmental Examination (IEE)/Environmental Impact Assessment (EIA), the project under consideration falls under Schedule-II's Category "G" (Waste Disposal), which calls for an EIA due to the project's potential for negative environmental effects. The document is an Environmental and Social Impact Assessment (ESIA) report detailing the potential impacts of a sewerage infrastructure project across different phases: pre-construction, construction, and operation. Key findings and mitigation measures are as follows:

**Pre-construction Phase:** The use of the Tunnel Boring Method minimizes environmental disturbances compared to traditional methods. However, odor emissions, soil corrosivity, and climate change effects (greenhouse gases) are expected negative impacts. Mitigation measures are using protective coatings, sealed systems, and proper design to reduce emissions and risks.

**Construction Phase:** The construction activities would lead to air and water pollution from machinery, runoff, and waste, soil erosion and loss of vegetation, noise and vibration affecting sensitive receptors, traffic disruption, and temporary displacement of businesses and residents, health and safety risks for workers and the public. Regular monitoring, dust suppression, careful waste management, worker training, and robust safety measures are the mitigation measures.

**Operation Phase:** The project will improve land use, and employment, and reduce pollution in untreated sewage discharge. Maintenance challenges, occupational health risks, and greenhouse gas emissions are expected negative impacts. The mitigation measures proposed are wastewater treatment before discharge, robust operational protocols, and regular inspections.

#### 4.1.2. Resettlement Aspects

The proposed project will have both positive and negative environmental impacts during the construction and operational phases, for which proper mitigation measures are devised. The project will require approximately 2 acres of government land owned by LWASA, which is available at the existing Gulshan-e-Ravi disposal station. No land acquisition is necessary, and the project is technically feasible in this location. However, the government land is not without encumbrance, and resettlement impacts have been identified in ESIA. The identified resettlement impacts include the physical displacement and relocation of government institutions and places, including the Metropolitan Corporation Lahore field office and Union Council No 77, as well as Patwar Circles namely Nonarian, Sanda Khurd, Babu Sabu, and Saggiyan Kalanwar. These offices will be accommodated in the building block to be constructed in the disposal station. Additionally, 93 fruit and non-fruit-bearing trees will be affected. The shifting of these trees within the premises is recommended. However, if a tree is lost, 10 trees will be planted to replenish the loss. Public utilities, such as an electricity pole and transmission lines, will also be relocated.

#### 4.1.3. Livelihood Aspects

The laying of underground trunk sewers does not involve any land acquisition on the routes of trunk sewer lines. The construction activities will take place on jacking and recipient stations which are located on the roads owned by the Government. Similarly, no structures will be demolished, and no physical displacement will be involved. The anticipated project impacts are temporary in terms of temporary loss of livelihood and access to businesses and houses. As per the findings of the Impact Assessment Survey (IAS), the livelihood of different families is associated with the commercial activities that are under the impact of the project. With the project interventions in impact areas, 17 different types of business operators/shopkeepers will face a temporary impact on their commercial activities that will result in the loss of their livelihood for the period of business interruption until restored. The loss of net income of these impacted businesses will be compensated monetarily. Business interruption in the project area would have caused a loss of temporary impacts for 30 workers employed by the business operators. All workers will be compensated for the loss of their wages as livelihoods.

#### 4.1.4. Gender Aspects

Business disruption impacts are assessed on the route of trunk sewer lines. None of the impacted businesses are run by women. No women employee was found in these businesses. However, the gender consultation process for the project, in line with AIIB's Gender Guidelines and Environmental and Social Policy (ESP) was carried out. This aimed to ensure equitable participation and benefit-sharing for women and vulnerable groups throughout the project's lifecycle. The consultation focuses on assessing gender-specific impacts, incorporating women's perspectives, promoting gender equality, and enhancing community participation. Key findings reveal concerns about health risks, economic opportunities, access to information, and existing sewerage infrastructure. Women emphasized the need for improved safety measures, job creation, skills training, and a gender-sensitive grievance mechanism. Recommendations include capacity building, enhanced communication strategies, and ongoing engagement to ensure sustainable gender-sensitive outcomes. Women were generally optimistic about the project believing that the project would improve employment, mobility, income generation, and overall living standards.

The Gender Action Plan (GAP) as a standalone document prepared for the project aligns with the AIIB's Environment and Social Framework (ESF). GAP aims to promote gender equality, inclusivity, and women's socioeconomic empowerment. It serves as a roadmap to achieve the United Nations Sustainable Development Goal No. 5 on Gender Equality. The GAP emphasizes the importance of integrating gender issues into all project components, enhancing women's participation, raising awareness about health and sanitation, and addressing gender-based violence. Key objectives include conducting gender sensitivity training, fostering community engagement, and ensuring that women and marginalized groups are included in designing, implementing, monitoring and evaluating activities.

To implement the GAP, the project will focus on various initiatives such as awareness training on sewerage management and hygiene, capacity building for women, and economic opportunities. Activities include educating participants on safe waste disposal and the economic impacts of inadequate sewerage systems while providing training to enhance skills in sanitation management. GAP also consists of the skill development training plan. Additionally, measures will be taken to prevent child labor and address gender-based violence through awareness campaigns and establishing support structures.

## **4.2. Stakeholder Consultations**

As per requirements of AIB's Environment and Social Policy (ESP), consultations were carried out with stakeholders including business runners, residents, and Affected Persons (APs) and relevant government departments and authorities to inform them about the project components and probable impacts the project would generate. The opinions, views, and suggestions for the minimization and mitigation of project impacts were recorded. A Stakeholder Engagement Plan (SEP) has been prepared as a standalone document wherein the stakeholder engagement activities are outlined. The findings of consultations are presented in the ensuing paragraphs.

### **4.2.1. Consultation with Affected Persons and Community**

Consultations were carried out with business runners, residents, and Affected Persons (APs) to inform them about the project components and probable impacts the project would generate. The opinions, views, and suggestions for the minimization and mitigation of project impacts were recorded. The concerns and issues raised by residents and APs have been adequately considered in the provision of livelihood restoration assistance in safeguards documents. The concerns relating to compensation for loss of income will be catered to by PMU-LWASA. The compensation equaling 04 months of income of APs from their businesses is considered enough by the APs.

The concerns related to disturbance of access, and environmental issues were recorded and it was informed that mitigation measures such as traffic management and control of air and noise pollution will be mitigated. Necessary safety measures with cautionary signs including health, safety, road safety, and pedestrian crossing will be displayed during the construction and operational phase of the project. The APs and residents were informed that nighttime work would take place during the construction of the project. Mitigation measures will be adopted to reduce disturbance to the residents during nighttime work. APs will be provided with opportunities by the Contractor for employment during the construction phase and opportunities will also be explored for the employment of APs in the operational phase of the Project. However, they suggested in time project completion and provision of adequate compensation to the APs.

APs were apprised of the ESIA and LRP document by providing them with the details such as compensation to be paid, advance notices on construction schedules, timeline for completion of construction activities and measures to be adopted to ensure their health and safety. They were also apprised of the Grievance Redress Mechanism (GRM) available to them in case they have any grievance related to compensation payment and grievances related to health and safety and contractors' work.

Gender consultation sessions were held along the project sites. The participants of these sessions revealed that women had limited awareness of the proposed project and its potential impacts. It was essential to enhance their understanding to enable informed participation. Women expressed concerns about potential health risks associated with construction activities, including dust, noise, and exposure to hazardous materials. They also raised safety concerns, particularly about construction sites near residential areas. Women indicated a strong interest in employment opportunities related to the project. However, they also highlighted barriers such as a lack of relevant skills and training, which could limit their participation. Women reported challenges in accessing information about the project, often due to cultural norms and literacy levels. This underscored the need for targeted communication strategies that consider these barriers. There was a lack of awareness among women about existing grievance redress mechanisms. Women emphasized the need for a gender-sensitive grievance mechanism to access safely and confidently. The summary of consultations is given in Table 3 below.

Table 3 Summary of Consultation with APs and Community

Date of Consultation	Venue of Consultation	Number of Participants	AP's General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
<b>Trunk Sewer Line Route</b>					
17-09-2022	Q Chowk, College Road Gulbarga-III, Lahore	8	<p>The project is good for the benefit of residents of Lahore and local people as it will clean the drains which are spreading foul smell and are a cause of accidents.</p> <p>The tunneling technology is also good as it will lead to less impact on businesses and road users.</p>	<ul style="list-style-type: none"> <li>- Project abandoned due to frequent changes in governments.</li> <li>- Businesses that will be impacted and need adequate compensation</li> <li>- Businesses interruption can be avoided by changing the location of pits to the other side of the road</li> </ul>	<ul style="list-style-type: none"> <li>- The project is fully funded by the Asian Infrastructure Investment Bank (AIIB) hence will be implemented and will not stop on want of funds or change of government.</li> <li>- Request will be forwarded to the contractor who will look into it at the time of detailed engineering design.</li> </ul>
17-09-2022	Q Chowk, College Road Gulberg-III, Lahore	5	<p>The project is in favor of local people. The cleaning of drains will clean the area and the lives of children and adults will be saved which is threatened as incidents of falling in the drain occur.</p>	<ul style="list-style-type: none"> <li>- Project may not be implemented as many projects are suspended after the change of government.</li> <li>- The project should not disturb the businesses and access of local people.</li> </ul>	<ul style="list-style-type: none"> <li>- The project is fully funded by the Asian Infrastructure Investment Bank (AIIB) hence will be implemented and will not be suspended.</li> <li>- The business interruption will be compensated, and access will be ensured by providing alternative routes.</li> </ul>
18-09-2022	Hamza Hospital, Shama Road	2	<p>The project is beneficial for the local population and the coming generations.</p> <p>The project will help in cleaning the environment.</p> <p>The lives of children will be saved. Our business should be protected during construction. Additionally, construction activity should not harm the environment. Cash compensation should be provided for the disruption of our business. The compensation</p>	<ul style="list-style-type: none"> <li>- Businesses should be protected during construction.</li> <li>- Construction activity should not harm the environment.</li> <li>- Cash compensation should be provided for the disruption of our business. -The compensation should be enough to meet the expenses of APs for a couple of months.</li> </ul>	<ul style="list-style-type: none"> <li>- Efforts are made to reduce business losses in the design. The same will be followed by the contractor.</li> <li>- Mitigation measures will be adopted for environmental protection during construction</li> <li>- The project will affect businesses for one month, however, compensation will be for about 03 months.</li> </ul>

Date of Consultation	Venue of Consultation	Number of Participants	AP's General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
			should be enough to meet expenses for a couple of months.		
21-09-2022	Sikandar Road, Cantt Drain Mian Mir Colony	1	<p>The project is designed by the government, and hopefully, it will benefit.</p> <p>The project should be for the benefit of local people.</p> <p>The drain is open, and people dump solid waste in it. Once a child also drowned in this drain.</p> <p>If the sewer line is laid, we support the project.</p> <p>The open drain causes disease.</p> <p>It also justifies the machines like Air Conditioners and other machinery getting rotten.</p>	None	Not Applicable
08-02-2023	Shama Metro Bus Station	2	Tunneling is a good technique.	<ul style="list-style-type: none"> <li>- Business should not be affected.</li> <li>- The construction should take place away from the business.</li> <li>- The road should not be destroyed as this leads to business interruption</li> </ul>	<ul style="list-style-type: none"> <li>- Affected businesses will be compensated.</li> <li>- The destroyed part of the road will be repaired.</li> </ul>
08-02-2023	Shama Chowk	8	At this time of high inflation, we cannot see any advantage of such a project as it will affect already deteriorated businesses badly.	<ul style="list-style-type: none"> <li>- Project will cause loss of businesses that are already in the doldrums.</li> <li>- The government should protect businesses first and give second priority to such projects.</li> </ul>	<ul style="list-style-type: none"> <li>- Businesses will be interrupted temporarily against which compensation will be paid.</li> </ul>
08-02-2023	Abbot Road Shops	7	<p>The benefit is that the issues arising from the mismanagement of liquid waste will be reduced.</p> <p>Water will not accumulate in the streets.</p>	<ul style="list-style-type: none"> <li>- Businesses will be badly affected.</li> <li>- Government should take care of inflation at present rather than initiating such projects.</li> </ul>	<ul style="list-style-type: none"> <li>- Business interruption will be well-compensated</li> <li>- Development projects contribute to the local economy.</li> </ul>

Date of Consultation	Venue of Consultation	Number of Participants	AP's General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
08-02-2023	Main Chauburji Park	7	There is no need for such projects in the present high inflation period.	<ul style="list-style-type: none"> <li>- The life and business of common men will be destroyed by this project.</li> <li>- People don't have money to feed their children, and the government is putting a burden on common men by building such projects</li> </ul>	<ul style="list-style-type: none"> <li>- Business interruption will be well compensated</li> <li>- Development projects play a vital role in economic development.</li> </ul>
8-02-2023	Bahawal Pur Road	9	There is no need for such a project in the present high inflation period.	<ul style="list-style-type: none"> <li>- Roads will be closed which will destroy the businesses.</li> <li>- People are already under stress due to inflation. They need flour, not a sewer.</li> </ul>	<ul style="list-style-type: none"> <li>- Access will be ensured by providing alternative routes</li> <li>- Development projects should also take place along with the welfare of local people.</li> </ul>
05-04,2023	WASA Disposal Station- Gulshan Ravi	9	The government should focus on such projects	The dwellers fear their livelihood will be impacted	Livelihood losses will be compensated.
10-04-2023	Mehr Nazir Park	10	The project is beneficial for local people as the sewerage is blocked off and on	None	Not Applicable
10-04-2023	Ganda Nala Bund Road, Gulshan Ravi	8	The project is beneficial for local people as the sewerage is blocked off and on	None	Not Applicable
23-08-2024	Babu Nonarian Road	6	The project will be greatly beneficial to the public.	<ul style="list-style-type: none"> <li>- The construction works will disrupt all the business activities temporarily.</li> <li>- Access to Transportation goods will be restricted. They showed satisfaction with the construction of the project and stated that the project would be beneficial for the public.</li> <li>- Previously construction of road projects also affected their business activities.</li> </ul>	The suggestion of participants to shift the construction area to the right bank of the Cantonment Drain to avert livelihood impact is forwarded to the concerned authorities. This shifting has been made in the design accordingly



Date of Consultation	Venue of Consultation	Number of Participants	AP's General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
				<ul style="list-style-type: none"> <li>- They showed concern that construction activities should be completed within the stipulated time of 02-03 months as communicated by the survey team. They also expressed that if there is a delay in construction activities in the specified time, their business will be disrupted, which will cause income loss.</li> <li>- Minimal time will be utilized for the completion of construction activities in the area.</li> <li>- They also highlighted that construction material would not be placed/kept in front of the door/gates of shops/houses.</li> <li>- They also said that their stock/goods arise at the shop/store once a week on an average basis on vehicles, and there should be no hindrance to the transportation of goods/stock.</li> <li>- They pointed out that the construction of a sewer line towards the right side of the nullah will reduce resettlement/income displacement impacts as well as reduce the impacts on traffic mobility in the area.</li> </ul>	
23-08-2024	Mustafabad	6	The benefit is that the issues arising from the mismanagement of liquid waste will be reduced.	<ul style="list-style-type: none"> <li>- Businesses in this reach will be affected due to construction activities.</li> <li>- Access to customers will be restricted during the construction period.</li> </ul>	Access to shops will be ensured.

Date of Consultation	Venue of Consultation	Number of Participants	AP's General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
				<ul style="list-style-type: none"> <li>- Mobility of the Public will be affected and alternate access roads should be provided for mobility.</li> <li>- They suggested that an alternate site towards the right side of the nullah may be considered for the installation/placement of a sewer pipeline.</li> </ul>	
23-08-2024	Allama Iqbal Road, Bird Market	4	The project is good for the people living in the area	<ul style="list-style-type: none"> <li>- Road closures will negatively impact local businesses, potentially causing significant disruptions.</li> <li>- With inflation already putting people under financial strain, their immediate concern is access to necessities like flour, rather than new sewer infrastructure.</li> </ul>	Access to shops will be ensured
23-08-2024	Railway Stadium, Mughalpura Road	5	The project is good for future developments.	<ul style="list-style-type: none"> <li>- Business operations in this area will be impacted by the construction of this project.</li> <li>- They expressed their concern that construction activities will impact in reduction of Customers.</li> <li>- They suggested that shifting the jacking pit point at a distance of around 200ft to 250ft will avoid business disruption/income displacement/loss as there are shops at that place. However, the construction of the project is good for future developments.</li> </ul>	The suggestion of participants to shift the construction area backward in front of the wall of the railway stadium to avert livelihood impact will be forwarded to the concerned authorities. The design is changed to avert impacts accordingly
23-08-2024	Mozang Road	5	The project is beneficial for the area as the sewerage is blocked off and on.	<ul style="list-style-type: none"> <li>- They raised the issue of rainwater and highlighted that the rainwater penetrates their shops during the rainy season.</li> </ul>	<ul style="list-style-type: none"> <li>- The contractor will be bound by LWASA to complete the civil works in the stipulated time.</li> </ul>

Date of Consultation	Venue of Consultation	Number of Participants	AP's General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
				<ul style="list-style-type: none"> <li>- They expressed concern that construction activities should be completed within the stipulated timeframe of 2-3 months, as communicated by the survey team. They also indicated that any delays in the construction process beyond this period could disrupt their business operations and result in a loss of income.</li> <li>- Customer access will be limited during the construction period.</li> <li>- Previously construction of road projects also affected their business activities.</li> <li>- It will take more than 3 months we do not support it.</li> <li>- They recommended considering an alternative site on the right side of the nullah for the installation or placement of the sewer pipeline.</li> <li>- Minimal time will be utilized for the completion of construction activities in the area.</li> <li>- They expressed concern that the construction activities will take more than 3 months, causing income loss due to disturbance of business, and therefore do not support it. They also added that the department should consider an alternate site /route to save the loss of their businesses.</li> <li>- They also emphasized if there is no alternate site or route available the department should try to minimize the</li> </ul>	<ul style="list-style-type: none"> <li>- The compensation will be paid to the business holders whose business will disrupt due to construction of sewer line</li> </ul>

Date of Consultation	Venue of Consultation	Number of Participants	AP's General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
				<p>construction period by doing day and night work.</p> <ul style="list-style-type: none"> <li>- They also pointed out that the local contractor should not deployed/engaged in this project as they have no less resources and capability of machinery and equipment.</li> <li>- They also express their concern that shop operators will not allow the construction activities of the project in this area. They also insisted that the survey team may contact the market union president in this regard.</li> </ul>	
10-12-2024	Nusrat Colony, Mian Meer, Cantt	19	The project is good for the benefit of residents of Lahore and local people as it will clean the drains which are spreading foul smell and are a cause of accidents.	<ul style="list-style-type: none"> <li>- The project should be completed swiftly. Project delays may cause disturbance for the public.</li> <li>- Construction areas should be restored.</li> <li>- Cleanliness should be maintained.</li> <li>- Night-time work will disturb the residents</li> </ul>	<p>The project is being financed by AIIB. Such projects are time-bound and hence will be completed in time. The contractor will restore the site to its original after completion of construction.</p> <p>The contractor will adopt essential measures to reduce disturbance to the residents during night shifts.</p>
10-12-2024	Infantry Road	11	The project is good for local people	<ul style="list-style-type: none"> <li>- It is requested to complete the project as soon as possible.</li> <li>- Site restoration to its original form after construction and cleanliness should be maintained.</li> </ul>	<p>The project is being financed by AIIB. Such projects are time-bound and hence will be completed in time. The contractor will restore the site to its original after completion of construction.</p>

Date of Consultation	Venue of Consultation	Number of Participants	AP's General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
11-12-2024	Samanabad	10	The project will be greatly beneficial to the public.	<ul style="list-style-type: none"> <li>- The project should be completed as early as possible.</li> <li>- Night-time work will disturb the residents</li> </ul>	<p>The project is being financed by AIIB. Such projects are time-bound and hence will be completed in time.</p> <p>The contractor will adopt essential measures to reduce disturbance to the residents during night shifts</p>
11-12-2024	LOS Road	10	The project will be greatly beneficial to the public.	<ul style="list-style-type: none"> <li>- During such projects, most of the time incompetent contractors are hired who don't work properly.</li> <li>- Usually, the workforce deployed during the construction of such projects is incompetent.</li> <li>-</li> </ul>	<p>The contractor will be bound to hire skilled labor and complete the work in time.</p>
11-12-2024	Saadi Park, Mozang Chungi	10	The project will be beneficial to the public.	<ul style="list-style-type: none"> <li>- The construction activities may generate air and noise pollution.</li> <li>- The construction activities may cause traffic disturbances and inconvenience to locals.</li> <li>- Competent workforce should be hired.</li> <li>- <b>Night-time work will disturb the residents</b></li> </ul>	<p>Transportation of construction materials will be avoided during the night and a strict schedule of construction material transport will be observed;</p> <p>Water sprinkling at sites will be ensured where dust will be emitted;</p> <p>Proper traffic management plan will be implemented to avoid traffic jams</p> <p>The contractor will adopt essential measures to reduce disturbance to the residents during night shifts</p>
12-12-2024	Qila Gujjar Singh	10	The project will be greatly beneficial to the public.	<ul style="list-style-type: none"> <li>- The project should not end up like conventional government schemes</li> </ul>	<p>The project is being financed by AIIB. Such projects are time-bound and hence will be</p>

Date of Consultation	Venue of Consultation	Number of Participants	AP's General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
				(i.e., incomplete, delayed, troublesome for the public, etc.) - Night-time work will disturb the residents	completed in time with the least disturbance to local people. The contractor will adopt essential measures to reduce disturbance to the residents during night shifts
12-12-2024	Shah Jamal, Ichra	10		- Concerns regarding the timely completion of the project. - Site restoration should be duly observed. - Competent contractors and labor should be hired. - Public disturbance should be avoided as much as possible. - Night-time work will disturb the residents -	The project is being financed by AIIB. Such projects are time-bound and hence will be completed in time with the least disturbance to local people. The contractor will adopt essential measures to reduce disturbance to the residents during night shifts
12-12-2024	Shera Kot, Nonarian Road	10	The project is highly appreciable since this area is poor in terms of sanitation, sewerage disposal, and hygiene.	- Access to shops and houses should be ensured - Night-time work will disturb the residents -	The access will be ensured by the provision of paths and bridges The contractor will adopt essential measures to reduce disturbance to the residents during night shifts.
<b>Disposal Station Site</b>					
13-4-2023	Disposal Station Gulshan-e-Ravi	6	The staff of the Metropolitan Corporation Lahore (MCL) and Revenue Department consulted. They appreciated the project.	- They showed concern that their offices will be demolished for the construction of the disposal station. The departments do not have any building in the area to house their offices	A new building block will be constructed as part of the disposal station. The staff of both MCL and the Revenue Department will be housed in that building. The building will be constructed before the demolition of existing structures.

Date of Consultation	Venue of Consultation	Number of Participants	AP's General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
				-	
<b>Gender Consultation</b>					
18-9-2024	J Block Gulshan-e-Ravi	10	The project appears to be beneficial for the local population	None	Not Applicable
18-9-2024	Ghari Shahu Market	10	If the sewer line is laid, we support the project.	Usually, that kind of project takes a lot of time to complete. We request the authority complete this project as soon as possible.	This is a funded project that is time-bound. Hence the construction works will be completed within the stipulated time.
18-9-2024	Larex Colony, Ghari Shahu	10	The project is beneficial for the local population	Not much to say we will just pray for this project completed as soon as possible, as construction work may disturb our daily business life routine. The population of the city increasing day by day need of this project, it should be done as soon as possible.	The contractor will be bound to take all measures to avoid disturbance to the local population.
18-9-2024	H 973+F&V, Mughalpura	10	<p>The project is designed by the government, and hopefully, it will benefit.</p> <p>The project should be for the benefit of local people.</p> <p>The drain is open and people dump solid waste in it. Once a child also drowned in this drain.</p> <p>If the sewer line is laid, we support the project.</p> <p>The open drain causes disease.</p>	Not much to say we will just pray for this project completed as soon as possible, as construction work may disturb our daily business life routine. The population of the city increasing day by day need of this project, it should be done as soon as possible.	The contractor will be bound to take all measures to avoid disturbance to the local population.

			It also justifies the machines like Air Conditioners and other machinery getting rotten.		
18-9-2024	Shera Kot, Ghulshan Ravi	7	The project will be greatly beneficial to the public.	Nothing to say. All the best for the project	Not Applicable
17-9-2024	Muhallah Urdu Nagar, Ghulshan Ravi	10	The project will be greatly beneficial to the public.	This project disturbs the daily routine of life. Govt should improve health benefits	The contractor will be bound to take all measures to avoid disturbance to the local population.
17-9-2024	Rasool Park Shama	10	The project will be greatly beneficial for the public.	They showed concern that construction activities should be completed within the stipulated time of 3 months as communicated by the survey team. They also expressed that if there is a delay in construction activities in the specified time, it will lead to impacts on livelihood and access. They also highlighted that construction material would not be placed/kept in front of the doors/gates of houses.	This is a funded project that is time-bound. Hence the construction works will be completed within the stipulated time. The contractor will be bound not to store material in front of doors/gates of houses.
17-9-2024	Mouza Nawa Kot, Shera Kot Samnabad,	17	The government should focus on such projects	They fear their livelihood will be impacted	Livelihood losses will be compensated.
September 17, 2024	Ichra, Shama	17	The project will be greatly beneficial for the public	It should be done as soon as possible.	This is a funded project that is time-bound. Hence the construction works will be completed within the stipulated time. The contractor will be bound not to store material in front of doors/gates of houses.
September 17, 2024	Park Street, Gulberg II	9	The project is beneficial for local people as the sewerage is blocked off and on	None	Not Applicable
September 17, 2024	Mozang chuangi, Chaburji	4	The project is beneficial for local people as the sewerage is blocked off and on	None	Not Applicable



#### 4.2.2. Consultation with Government Departments and Authorities

Three stakeholder consultation meetings were held with representatives from relevant government departments and authorities. The purpose of the meeting was to provide an overview of the project titled “Sewerage System from Larech Colony to Gulshan-Ravi Using Trenchless Technology” and to gather views, opinions, and suggestions from the concerned departments regarding project planning and engagement during the planning and execution phases. The participants were apprised of “Lahore Water and Wastewater Management Project (LWMMP)”, which is being implemented by LWASA with financial assistance from the Asian Infrastructure Investment Bank (AIIB). A key component of this project is the construction of a Sewerage System from Larech Colony to Gulshan-e-Ravi using trenchless technology. Micro-Tunneling Boring System (MTBS) will be deployed for the construction of the project to eliminate the need for open-cut excavation. Instead, pits/shafts at distant locations (250 to 500 m approximately) will be made and a Tunnel Boring Machine (TBM) will be employed to lay the sewer pipes.

EPC contractor will be hired who would require clearance of the site and working space otherwise it may result in a delay in meeting project timelines which is not acceptable in an EPC Contract as it may lead to claims from the contractor, therefore, we need to collectively work together to ensure well-prepared project to avoid any such nuisance in future. In this regard, detailed joint visits are required to be carried out with multiple utilities. Accordingly, any demand notice for shifting of services may urgently be prepared and shared with PMU. He further added that the EPC contractor will prepare detailed designs which may result in some variations at the site, therefore quick response will be required from each organization at the time of execution of the project.

Environmental and Social Impact Assessment (ESIA), Livelihood Restoration Plan (LRP), Gender Action Plan (GAP), and Stakeholder Engagement Plan (SEP) have been prepared for the project. The construction phase is expected to result in minor to moderate environmental and social impacts, such as traffic disruptions, temporary business interruptions, displacement of informal settlers, and air and noise pollution. He explained that each pit may take about 3 months for construction at the site. To address these impacts, compensation has been proposed for business losses. Additionally, mitigation measures have been developed to manage traffic and control air and noise pollution. All these strategies are integrated into the safeguard documents.

Participants expressed their satisfaction with the sewerage project, emphasizing its critical importance for Lahore city. They acknowledged that effective sewage management is essential for improving public health and environmental conditions. Overall, the consensus was that this project addresses a significant need for the community. A task force comprising Focal persons/representatives from all stakeholder departments is suggested to be notified to seek swift and amicable resolutions to the conflicts occurring during the construction phase. The key findings from this stakeholder consultation are outlined in Table 4 below.

**Table 4: Summary of Consultation with Government Departments**

<b>Sr. No.</b>	<b>Name / Department</b>	<b>Observation/ Clarifications</b>	<b>PMU (LWWMP) WASA Lahore Response</b>
1.	Punjab Mass Transit Authority (PMA)	<p>The project conflicts with existing and proposed Mass transit Lines in Lahore. The project consultants must share the details for better facilitation of the public at this stage.</p> <p>The project needs to obtain NOCs from the key Stakeholders.</p> <p>The alignment of the proposed project needs more attention or improvement.</p> <p>Coordination with key stakeholders is very important.</p>	<p>It was apprised during the meeting that WASA will share the design layouts with the PMA. Conflicts can be effectively resolved through a combined session with the Mass Transit Authority.</p> <p>PMU will request concerned departments to provide NOCs. Key stakeholders will be contacted throughout the project cycle.</p>
2.	Lahore Electric Supply Company (LESCO)	<p>Each department should depute the concerned Focal person.</p> <p>Weekly meetings can be arranged to address particular aspects of the project that need more attention or improvement.</p>	<p>The PMU will depute a focal person to make liaisons with the concerned departments.</p>
3.	Pakistan Telecommunication Company Limited (PTCL)	<p>The project will contribute positive impacts to the community.</p> <p>Email Newsletters will be the preferred method for receiving updates and information about the project.</p> <p>Weekly meetings can be arranged to address particular aspects of the project that need more attention or improvement.</p>	<p>Key stakeholders will be contacted throughout the project cycle.</p>
4	Sui Northern Gas Pipe Line (SNGPL)	<p>Close coordination and meetings between departments will be effective execution of the project.</p> <p>Impacts on Local Livelihoods could be the primary social concerns regarding the project.</p>	<p>Close coordination and meetings between departments will be made throughout the project cycle.</p> <p>It will be the project's priority to avoid any kind of livelihood impacts on the locals and if it becomes inevitable at some point, the project has prepared a detailed livelihood restoration plan in order to minimize and rehabilitate the impacts of the livelihood of locals.</p>

Sr. No.	Name / Department	Observation/ Clarifications	PMU (LWWMP) WASA Lahore Response
5	Fisheries Department, Government of Punjab	<p>Health and Safety Risks could be the Primary Social concerns regarding the project.</p> <p>Contamination of water quality could be the primary environmental concern regarding the sewerage project and disposal station.</p> <p>Email NEWS letters will be the preferred method for receiving updates and information about the project.</p> <p>Weekly meetings can be arranged to address particular aspects of the project that need more attention or improvement.</p>	<p>A detailed Environmental Social Management Plan (ESMP) has been prepared for the project in order to mitigate any health and safety risks.</p> <p>Three sewage water treatment plants are also planned, which will positively impact the ground water.</p> <p>Close coordination and meetings between departments will be made throughout the project cycle.</p>
6	Punjab Safe City Authority	<p>The primary social concerns regarding the project could be Traffic Congestion and Police Operations &amp; Security.</p> <p>Health and Safety Risks could be the Primary Social concerns regarding the project.</p> <p>Contamination of air quality could be the primary environmental concern regarding the sewerage project and disposal station.</p>	<p>The Traffic Management Plan has been prepared by the project and it has already been shared with PSCA for endorsement/information.</p> <p>A detailed Environmental Social Management Plan (ESMP) has been prepared for the project to mitigate any health and safety risks.</p> <p>Air quality monitoring will be made throughout the project cycle and necessary measures will be taken to avoid air quality contamination.</p>
7	Environment Protection Department (EPD)	<p>Air Quality, Water Quality, Noise Pollution, Waste Management, and Impact on Local Wildlife and Vegetation and Land use changes could be the primary environmental concerns regarding the sewerage project and disposal station.</p> <p>Displacement or Relocation, Impact on Livelihoods, Health and Safety Risks, Impact on Local Infrastructure, Social Cohesion and Community Relations, Public Access and Services could be the primary social concerns regarding the project.</p> <p>Biweekly meetings could make effective communication between the project and the concerned department.</p>	<p>A detailed Environmental Social Management Plan (ESMP) has been prepared for the project to mitigate all these environmental risks.</p> <p>It will be the project's priority to avoid any kind of livelihood impacts on the locals and if it becomes inevitable at some point, the project has prepared a detailed livelihood restoration plan to minimize and compensate for all these social issues of locals.</p> <p>Close coordination and meetings between departments will be made throughout the project cycle.</p>

Sr. No.	Name / Department	Observation/ Clarifications	PMU (LWWMP) WASA Lahore Response
8	Traffic Engineering and Transport Planning Agency (TEPA)	Project The use of technology that is yet to be used in Pakistan may bring new challenges. Services shifting could be a particular aspect of this project. Proper traffic diversion plans need to be prepared.	It is challenging but the project design has been synchronized with the local dynamics and all precautionary measures have already been taken by the experts. Services shifting will be made by following all the protocols issued by the concerned department. Traffic Management plan has been prepared and shared with TEPA.
9	Lahore Waste Management Company	<p>Site restoration is an important matter during this project's activities. If the slurry is not disposed of properly, it will adversely disturb the Environment</p> <p>Close coordination and meetings between departments will be essential related to the disposal of slurry.</p>	<p>The Project Director agreed that close coordination and cooperation with LWMC will save time and impact environmental conditions.</p> <p>PD said to make a cell in all the departments and assign a focal person in each department for better coordination with WASA.</p>
10	Metropolitan Corporation Lahore (MCL)	<p>What is the depth of the trunk sewer? There is a 132 KVA WAPDA underground line near Shimla Hills.</p> <p>It will damage the existing infrastructure/roads and services of different departments for pit excavation.</p> <p>What about the pits if it will conflict with the main Roads and public area?</p> <p>Zonal Officer MCL asked what is plan of the outfall drain.</p>	<p>It was explained that Safe City and other department services must be protected, as the construction work will be 9 meters deep.</p> <p>The PMU will make every effort in designing the project to minimize the conflict between the main roads and public areas.</p> <p>Assistant Project Director LWASA explained we have a separate project for wastewater treatment at Babu Sabu.</p> <p>The Project Director highlighted that after the project's completion, the nullahs/drains in the project area will primarily carry rainwater, alleviating their burden.</p> <p>Three sewage water treatment plants are also planned, which will positively impact the River Ravi.</p>

Sr. No.	Name / Department	Observation/ Clarifications	PMU (LWWMP) WASA Lahore Response
11	City Traffic Police Punjab	<p>Project Director LWASA asked DSP if the Chinese delegation visit is expected in the next few days and what their security plan. He also highlighted that WASA has written a letter to SP Cantt as well for security.</p> <p>Traffic diversion will be necessary.</p>	<p>DSP said the city traffic police will appoint focal persons for Chinese delegation security during the visit to different sites in Lahore.</p> <p>Traffic diversion management will be coordinated with the city traffic police.</p> <p>A traffic management plan has already been shared with the Chief Traffic Officer of Lahore.</p>
12	Lahore Waste Management Company	<p>Site restoration is an important matter during this project's activities. If the slurry is not disposed of properly, it will adversely disturb the Environment</p> <p>Close coordination and meetings between departments will be essential related to the disposal of slurry.</p>	<p>The Project Director agreed that close coordination and cooperation with LWMC will save time and impact environmental conditions.</p> <p>PD said to make a cell in all the departments and assign a focal person in each department for better coordination with WASA.</p>

#### 4.2.3. Consultation with Key Stakeholders

Consultation was held with key stakeholders including representatives of civil society organizations, government departments and local leaders. These stakeholders appreciated the project yet expressed that environmental and social impacts may affect the residents' livelihood and health and safety. The stakeholders were informed that compensation would be paid against the loss of livelihood and mitigation measures will be applied to ensure the health and safety of the residents. The details of the consultation, views and concerns are provided in Table 5 below:

Table 5: Consultation with Key Stakeholders

Sr. No.	Date of Consultation	Key Stakeholders	Name	Venue of Consultation	General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
1	1/10/2024	SAAR Digital (Lok Sugak), Lahore	Amir Butt, Desk Editor	Johar Town	<ul style="list-style-type: none"> <li>This project will be beneficial for the residents.</li> <li>Upgrade sewerage infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Urban flooding</li> <li>Soil Contamination</li> <li>Water and Air pollution</li> <li>Loss of livelihood</li> <li>Displacement of local persons</li> <li>Compensation for lost asset</li> <li>Timely completion of the project</li> <li>Reports should be disclosed to stakeholders</li> <li>Project Information dissemination</li> <li>Disposal of untreated in River Ravi</li> </ul>	The team was briefed about the project in detail. The team intimated that the project will address urban flooding. Mitigation measures are planned in ESIA to control air pollution. Compensation will be provided to APs at market rates. Information disclosure will be a continuous process during implementation. LWASA has plans to construct a wastewater treatment plant at Babo Sabo.
			Rafique Malik, Desk Editor				
2	1/10/2024	Punjab Urban Resource Center, Lahore	Dr. Imdad Hussain	Gari Shahu	<ul style="list-style-type: none"> <li>This project will be beneficial for the residents.</li> <li>Upgrade sewerage infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Soil Contamination</li> <li>Water and Air pollution</li> <li>Loss of livelihood</li> <li>Displacement of local persons</li> <li>Compensation for lost asset</li> <li>Timely completion of project</li> <li>Disposal of untreated in River Ravi</li> <li>Timely completion of project</li> <li>Grievance/ complaints Redress Mechanism</li> </ul>	The team was briefed about the project in detail. The team intimated that the project will address urban flooding. Mitigation measures are planned in ESIA to control air pollution. Compensation will be provided to APs at market rates. Information disclosure will be a continuous process during implementation. LWASA has plans to construct a wastewater treatment plant at Babo Sabo.
3	10/9/2024	Punjab Irrigation	Shahid Habib Dy. Director (E&S)	Irrigation Secretariat, Anarkali			Team intimated those applicable laws will be followed during the implementation of project

Sr. No.	Date of Consultation	Key Stakeholders	Name	Venue of Consultation	General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
		Department, Lahore	Farooq Ahmed Dy. Director, Outreach & Communication		<ul style="list-style-type: none"> <li>This project will be beneficial for the residents.</li> <li>Upgrade sewerage infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Project authority should have close coordination with the irrigation department.</li> <li>Consider the relevant provisions of the Water Act 2019 and Punjab Irrigation River Drainage Act 2023 during the planning and implementation of the project.</li> <li>Consultation with all stakeholders throughout the project cycle.</li> <li>Establish a forum for regular stakeholder meetings to resolve the issues.</li> <li>Avoid disposal of untreated water in River Ravi</li> </ul>	
4	11/9/2024	Public Health Engineering Department, Lahore	Akhter Abbasi Chief Engineer, South	2. Lake Road Lahore		<ul style="list-style-type: none"> <li>During construction building damages may occur.</li> <li>Proper remedial measures/compensation of the lost assets.</li> <li>Meeting on a monthly basis between departments</li> <li>High Density Polyethylene should be used to reduce gas emissions.</li> </ul>	Compensation will be provided to APs at market rates. Information disclosure will be a continuous process during implementation.
			Muhammad Tariq Dy. Director (Community Development)				
5	4/10/2024	Local Leaders	Ilyas Khan Coordinator/Ex. General Councilor (UC-77)	Gulshan Ravi	This project is good for the development of city.	<ul style="list-style-type: none"> <li>Urban flooding</li> <li>Out fall drainage should be reconstructed and fully covered.</li> <li>Reduction in risk of water borne diseases</li> </ul>	The project aims at the improvement of the environment.
			Yamin Mughal Coordinator (UC-79)	Gulgasht Colony			

Sr. No.	Date of Consultation	Key Stakeholders	Name	Venue of Consultation	General Perceptions of the Project	Issues and Concerns Raised During Consultation	Response from the Project
			Javeed Sarwar Bhatti Coordinator (UC-100)	Sherakot		<ul style="list-style-type: none"> <li>• Unhygienic condition and odor issues</li> <li>• Public awareness</li> <li>• Timely completion of project</li> </ul>	
			Ashraf Namberdar Ex. Nazim (UC-100)	Sherakot			



## 5. STAKEHOLDER ENGAGEMENT PLAN

### 5.1. Stakeholder Engagement Process

Stakeholder engagement is a continuous process adopted throughout the project lifecycle to avoid or minimize adverse potential environmental and social risks and impacts and smooth running of project activities through the planning/designing, implementation and operational phases of the project. Project stakeholders will be engaged in the project activities throughout the project cycle commencing from the planning and designing of project interventions to the implementation and monitoring and evaluation and reporting. Stakeholder engagement will continue activities in three phases. In the first phase, stakeholders are actively engaged in the project planning/designing and preparation of environmental and social safeguards documents. The information disclosure of the safeguard documents is the second phase. The third phase comprises of implementation of these documents. Phase-wise stakeholder engagement activities for the project are described in the ensuing paragraphs.

#### 5.1.1. Project Planning and Designing

The environmental and social safeguards documents are prepared for the project based on the technical design of the project. Safeguards consultants prepared the study design, along with instruments for data collection. These instruments are implemented in the collection of environmental and social baseline and impact assessment data. In this process, various stakeholders are engaged in field surveys and investigations. Structured interviews, FGDs, public consultation sessions, and stakeholder consultation meetings were carried out with multiple stakeholders including affected persons, the general community, relevant government institutions and civil bodies. Gender consultations are also carried out. The key engagement activities are as under.

- Briefing the stakeholders on project components and potential environmental and social impacts
- Data Collection on environment and social baseline and impact assessment
- Public consultation on environmental and social impacts and mitigation
- Consultation with relevant government departments on project design and environment and social safeguard documents.
- Consultation with other stakeholders on project design and environmental and social safeguards documents.

The active participation of stakeholders in the project planning and designing phase resulted in improvement in project design. Additionally, environmental and social impacts were thoroughly examined by the stakeholders to give good feedback on avoiding or minimizing these impacts and on appropriate mitigation measures. Safeguards documents including ESIA, LRP, GAP and SEP have been prepared for the project

#### 5.1.2. Information Disclosure

The second phase of the engagement focuses on disclosing and consulting after the preparation of the draft ESIA, LRP, GAP, and SEP. These documents will be disclosed on LWASA and AIIB websites once approved and cleared by AIIB. The copies of these documents will be shared with the relevant government and non-governmental agencies and other stakeholders. The summaries of these documents in Urdu will be prepared and disseminated to affected households and the community in general. Awareness-raising sessions will also be held for information disclosure purposes. ESIA, LRP, GAP and SEP will be updated/ finalized on the basis of detailed design by the EPC contractor. The concerns raised by the stakeholders about the safeguard documents will be incorporated in the final documents. The documents will be again approved by LWASA and cleared by AIIB. After the

clearance of AIIB, the updated documents will be disclosed again on LWASA and AIIB's websites. Additionally, these documents will be disseminated to the stakeholders again. The environmental and social safeguards staff of PMU, PMC, and EPC Contractor will hold location-specific meetings with APs along the corridors of the trunk sewer line to make them aware of important aspects of the ESIA, LRP, GAP and SEP through awareness-raising sessions.

### **5.1.3. Environmental and Social Safeguards Implementation**

A continued process of stakeholder engagement with APs and other stakeholders will be followed to ensure transparency in the implementation of ESMP, LRP, GAP, and SEP, and to keep the affected persons and other stakeholders informed. The feedback would be received and incorporated at various stages of the Project implementation and ES management of the Project. It will provide a good measure to improve the project's social acceptability and ensure the stakeholders' effective participation in project implementation, especially the APs in the implementation process. Stakeholder engagement will inform the stakeholders about the project activities and assist in obtaining cooperation from informed APs and other stakeholders, to avoid cost and time in dealing with complaints and grievances. As per the requirements of the AIIB ES Policy and standards, and Policy on Public Information, plans for the stakeholder engagement/consultation and participation during the implementation of ESMP and RP are delineated in the ESIA and RP. The PMU will continue the stakeholder consultation process (disclosure and exchange of information) by taking the following steps:

- i. The LWASA through the environment and social staff (ESS) of PMU, PMC and EPC Contractor will keep a close liaison with the stakeholders including APs, women and the community residing near the project locations
- ii. Address stakeholder concerns, complaints, and grievances, and keep their record;
- iii. Organize periodic meetings with the stakeholders and appraise them about the implementation progress of the Project including implementation of environmental and social instruments (ESMP, LRP and GAP)
- iv. Detail and outcome of all stakeholder engagement activities will be included in monthly, quarterly, bi-annual, and annual internal monitoring reports of PMC.
- v. Disclose all monitoring reports in the same manner as that of the approved ESIA, LRP, and GAP at LWASA and AIIB websites and to the APs and other stakeholders through appropriate means of communication.
- vi. Grievance Redressal Mechanism will be used for registration and redressal of complaints and grievances of the stakeholders and general public and APs.

### **5.1.4. Stakeholder Engagement in Project Operation Phase**

Stakeholder engagement will continue in the project operation phase to keep informed the stakeholders on the project operations. LWASA and AIIB websites and other localized means of communication will be used for ongoing information dissemination via face-to-face meetings and consultations with the affected persons while Grievance Redressal Mechanism will be used for registration and redressal of complaints and grievances of the stakeholders and general public.

## **5.2. Stakeholder Engagement Plan**

The stakeholders will be engaged by using certain participation methods in the planning, designing, information disclosure, implementation and operation phases of the project. Stakeholder groups, their engagement level, objectives for engagement, participation methods, responsibility, timing, and implied resources have been mapped out in the Table 6 below.

Table 6- Stakeholder Engagement Plan

S. No.	Stakeholder Group	Objective of Engagement	Level of Participation	Participation Methods	Responsibility	Timeline	Resources
1	All Affected Persons (APs) directly affected by livelihood disruption And vulnerable groups	Effective participation in project planning, implementation, payment of compensation, grievance redressal	High	<ul style="list-style-type: none"> <li>- Information sharing through the provision of summarized Urdu versions of ESIA, LRP and GAP.</li> <li>- Community meetings with APs on implementation of compensation payment.</li> <li>- Compensation payment</li> <li>- Implementation of GRM.</li> </ul>	PMU-LWASA/PMC.	At all stages of the project from preparation of ES documents to planning, design, implementation, and monitoring. Indicative timelines are -Information sharing consultation Q1 -Compensation payment Q1 -Grievance Redressal Q1 and Q2	Budget allocations for information disclosure
2	Women directly or indirectly affected by the project and beneficiaries of the project and vulnerable groups	Effective participation in awareness-raising and training	High	<ul style="list-style-type: none"> <li>- Information sharing through the provision of summarized Urdu versions of ESIA, LRP, and GAP.</li> <li>- Gender consultation meetings with women APs and project beneficiaries on project implementation</li> <li>- Implementation of GRM.</li> <li>- Training of women in skill health and hygiene</li> <li>- Training of women in skill development</li> </ul>	PMU-LWASA/PMC	At all stages of the project from preparation of social safeguards documents to planning, design, implementation, and monitoring. Indicative timelines are -Information sharing consultation Q1 - Training in health and hygiene Q1 to Q4 - Training in skill development Q1 to Q8 -Grievance Redressal Q1 to Q12	Budget allocations for information disclosure and training

S. No.	Stakeholder Group	Objective of Engagement	Level of Participation	Participation Methods	Responsibility	Timeline	Resources
3.	Service delivery government departments and authorities	Effective participation in project planning, designing and implementation.	High	<ul style="list-style-type: none"> <li>- Consultation meetings on project design and ES documents</li> <li>- Notification of focal points in each service delivery department.</li> <li>- Information sharing on project progress</li> <li>- Information sharing on change in development plans</li> <li>- Monthly meeting on project progress to identify overlapping issues</li> </ul>	PMU-LAWASA/PMC	<p>At all stages of the project from project planning and designing, to implementation, and monitoring. Indicative timelines are</p> <ul style="list-style-type: none"> <li>- Consultation meetings on project design Q1</li> <li>- Notification of focal points Q1</li> <li>- Information sharing on projects Q1 to Q12</li> <li>- Monthly progress review meetings Q1 to Q12</li> </ul>	Budget allocation for project management cost
4	Provincial government departments	Effective participation in planning and designing of the project as well as in implementation monitoring and evaluation	High	<ul style="list-style-type: none"> <li>- Coordination meetings for project preparation, safeguards documentation, and implementation of project interventions</li> <li>- Monitoring and evaluation during the implementation of the project</li> </ul>	PMU-LWASA	<p>At all stages of the project from preparation of social safeguards documents to planning, design, implementation, and monitoring. Indicative timelines are</p> <ul style="list-style-type: none"> <li>- Coordination meetings on project design Q1 to Q12</li> <li>- Monitoring visits Q1 to Q12</li> </ul>	Budget allocation for project management cost
5	Non-governmental Organizations (NGOs), and Academic and Research Institutions	Information-based participation to share experience, lessons learned, and coordination meetings for implementation of project interventions	Moderate	Coordination meetings, sharing of information	PMU-LWASA/PMC	<p>Information Sharing during the implementation phase</p> <p>Indicative timelines are</p> <ul style="list-style-type: none"> <li>- Information sharing Q1 to Q12</li> <li>- Coordination meetings Q1 to Q12</li> </ul>	Budget allocation for project management cost

S. No.	Stakeholder Group	Objective of Engagement	Level of Participation	Participation Methods	Responsibility	Timeline	Resources

### 5.3. Stakeholder Engagement Plan Implementation

The overall responsibility of project implementation lies with the Project Management Unit (PMU) established in LWASA. PMU will supervise the implementation of ESIA, LRP, and GAP through its Environment and Social Staff. The Project Management Consultant (PMC)/Owner's Engineer will implement ESIA, LRP and GAP. PMU will supervise the implementation of SEP and PMC will implement SEP. The following tasks will be undertaken to implement SEP.

- Implement SEP as laid down in principles and procedures.
- Oversee all stakeholder liaison-related matters and develop a monitoring plan for the monitoring of SE activities.
- Manage the grievance mechanism set up for the project beneficiaries and other stakeholders.
- Liaise with the consultants, contractors, and relevant government departments, other relevant parties to ensure that grievances are tracked, reported, and responded to as per GRM.
- Provide periodic reports to management of LWASA for onward submission to AIIB and other administrative authorities as required.

PMC and PMU will maintain all relevant records related to stakeholder engagement activities, grievance redressal, and monitoring and evaluation. E&S staff of PMU will develop a comprehensive database for stakeholder activities, feedback, and grievance redressal backed up record keeping on instruments such as stakeholder engagement activity and feedback format and complaint register for grievance redressal. Stakeholder engagement activity and feedback format consist of contact details of stakeholders, date of consultation/grievances, and summary of engagement activity and follow-up actions. A complaint register developed for the grievance redress mechanism will also serve the purpose of stakeholder feedback. This includes details of the concerns and grievances, the aggrieved, and the steps taken to resolve the grievances. Any accompanying documentation e.g., verbal or written statements, investigation reports, and photographic evidence are to be filed along with the grievances both in hard and soft copies.

### 5.4. Monitoring and Evaluation

It is important to monitor the effectiveness of the SEP activities including GRM. The key performance indicators for this include weekly reporting on the number of grievances received, resolved, and outstanding. This will be undertaken by the E&S staff of PMU and reported to the Project Director and GRCs in periodic progress reports. As part of the bi-annual review/report, analyzing the trends and time taken for grievance resolution will help to evaluate the efficacy of the GRM. As part of stakeholder engagement and consultation, involving the views of the stakeholders for whom the GRM is designed. The monitoring and review will help to improve effectiveness and stakeholder acceptance.

The PMU will maintain a database and activity file throughout the project detailing all public consultations, information disclosure, and grievances collected, which will be available on LWASA websites or requests for public review. Stakeholder engagement should be periodically evaluated by the E&S staff of PMU. The PMU will collect all essential data and information from the respective wings generate periodical monitoring reports on stakeholder engagement and grievance redressal and submit them to LWASA and AIIB.

### 5.5. Stakeholder Engagement Plan Implementation Budget

The implementation of SEP will involve financial resources such as cost for the development of information material, establishment of GRM and capacity building of stakeholders. The cost of implementation of SEP is estimated at PKR 2.5 million. The itemized cost is presented in Table 7 below.

**Table 7 Budget for SEP Implementation**

<b>S. No.</b>	<b>Description</b>	<b>Quantity</b>	<b>Unit</b>	<b>Unit Price (PKR)</b>	<b>Cost (PKR)</b>	<b>Cost in millions (PKR)</b>
1	Development and dissemination of communication material for ES documents (pamphlets, brochures, infographics, videos, press releases)	1	Lump Sum	1,200,000	1,200,000	1.2
2	Establishment of GRM (equipment and training)	1	Lump Sum	300,000	300,000	0.3
3	Stakeholder engagement (capacity building and training workshops)	1	Lump Sum	1,000,000	1,000,000	1
	<b>Total</b>				<b>2,500,000</b>	<b>2.5</b>

## 6. GRIEVANCE REDRESS MECHANISM

An integrated grievance redress mechanism (GRM) at the project level for environmental and social concerns is established to facilitate amicable and timely resolution of complaints and grievances of the AHs, including local communities regarding the social, environmental, and resettlement aspects of the project. The GRM is already in place for the preparatory phase of the project, it is a two-tiered structure. However, during the execution of the project, the three-tier GRM will be notified at the following levels:

- i. Grievance Redress Committee at field/construction site (GR Cell),
- ii. Grievance Redress Committee at LWASA PMU
- iii. Grievance Redress Committee at LWASA Management

The GRM will be gender-responsive, culturally appropriate, and readily accessible to the stakeholders at no cost and without retribution. The step-wise process of the proposed GRM is summarized below.

### 6.1. AIIB Requirements

As per the requirements of the Asian Infrastructure Investment Bank (AIIB), a suitable project-level grievance redress mechanism must be established in accordance with AIIB's and Social Policy, as well as applicable standards, to address concerns and grievances of project-affected persons and stakeholders. This mechanism will receive and facilitate resolution of concerns or grievances from individuals or groups who believe they have been adversely affected by the Project's environmental or social impacts or those who feel that their interests are at risk due to the Project's construction and operations activities. The mechanism will also ensure the protection of complainants from retaliation and respect their request for anonymity if desired while addressing concerns related to the project's social, resettlement, and environmental performance.

Although measures have been identified to mitigate the environmental, social, and resettlement impacts of the Project, it is acknowledged that despite best efforts, some individuals/households and stakeholders may still be dissatisfied with the measures adopted. To address such situations, an effective Grievance Redress Mechanism (GRM) has been established to ensure timely and successful implementation of the project. The GRM will provide a public forum for aggrieved parties to raise their concerns and seek adequate resolution. It will receive, evaluate, and facilitate the resolution of concerns, complaints, and grievances related to the environmental and social performance of the Project at the project level.

### 6.2. Aims and Objectives of Grievance Redress Mechanism

The primary objective of the Grievance Redress Mechanism (GRM) will be to investigate charges of irregularities and complaints and grievances received from affected persons (APs) and other stakeholders, and provide a time-bound, early, transparent, and fair resolution process to address and resolve environmental and social concerns and grievances linked to the project. The key objectives of the GRM are as follows:

- i. Provide a clear process for APs and other stakeholders to provide comments and raise grievances, ensuring that their voices are heard and addressed in a systematic manner.
- ii. Allow APs and other stakeholders to raise concerns, complaints, and grievances anonymously, using multiple intake locations and modes, to protect their identity and ensure confidentiality.



- iii. Structure and manage the handling of concerns and grievances in an organized manner, while also monitoring the effectiveness of the mechanism to continuously improve its performance.
- iv. Ensure that concerns and grievances are handled in a fair and transparent manner, in accordance with provincial laws and regulations, AIIB's environment and social policy framework and standards, and international best practices, to ensure a just resolution for all parties involved.

The GRM will be designed to uphold these objectives and provide a robust and responsive mechanism for addressing and resolving concerns and grievances related to the environmental and social impacts of the project.

### **6.3. Nature of Complaints to be Redressed**

It is anticipated that during the implementation and operational phases of the project, grievances and complaints may arise from affected persons (APs) and other stakeholders related to various issues, including but not limited to:

- i. Compensation and resettlement and rehabilitation assistance, such as the name of AP(s) missing from the eligible APs' list, incorrect identification of losses (such as damage to assets or loss of income) during the design stage, improper distribution of compensation and/or resettlement assistance, delays in the payment of compensation and resettlement assistance, etc.
- ii. Disruptions caused by civil works contractors, such as disruptions to general public services/utilities during civil works, non-observance of project principles as laid down in the Resettlement Plan (RP) and environmental issues, etc.
- iii. Any other issues arising during the project implementation that may affect APs and other stakeholders.

To ensure that APs and other stakeholders are aware of the Grievance Redress Mechanism (GRM), the Environmental and Social (ES) staff of the PMU, Project Management Consultant (PMC) and LWASA will conduct public awareness campaigns, disseminate information materials, and hold face-to-face meetings with both literate and illiterate APs. Information about the GRM will be posted on noticeboards at site offices of contractors and sub-contractors, construction camps, and concerned Government Departments.

### **6.4. Two Tier Grievance Redress Mechanism (GRM) for Preparatory Phase**

The Grievance Redress Mechanism of the project for the Preparatory Phase (before Execution) is already in place to resolve the concerns and grievances of the affected persons.

A first tier of the Grievance Redress Committee (GRC) has been notified for the Project to resolve the concerns and grievances of Affected Persons with the approval of the Managing Director, WASA vide office order no. PD/LWWMP/WASA/207-215 dated 13.04.2023. The committee is responsible for resolution of the complaints (received if any) within three (03) to seven (07) days. If necessary, this committee will consult with all relevant parties (e.g., Affected Persons, the general public, women, and relevant government departments) to resolve the issues. The office order of the notified designated committee for the first tier of GRM is given in Annexure-VI.

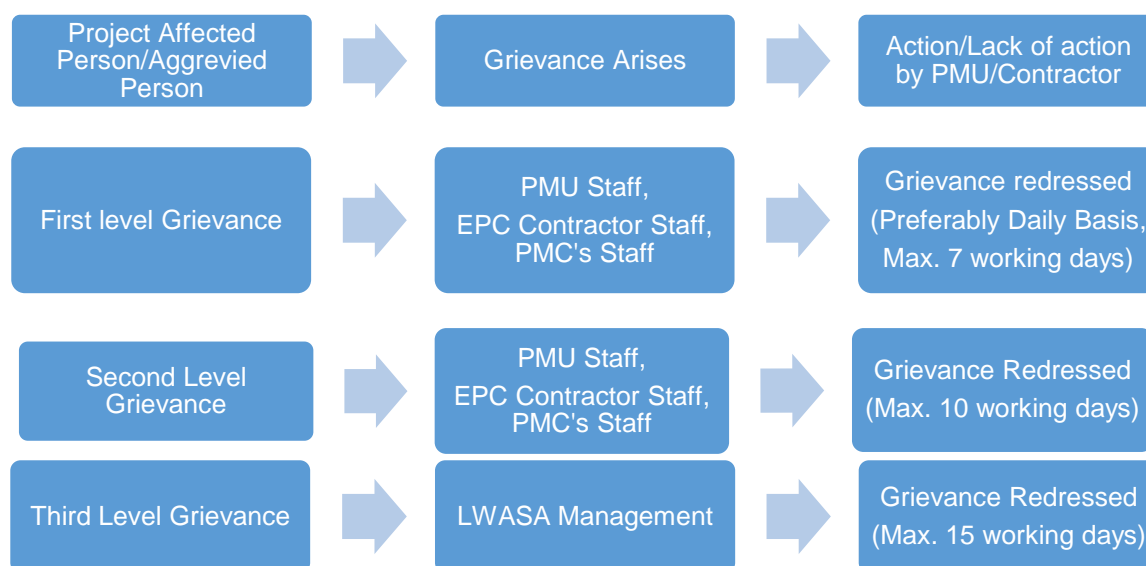
The designated 2<sup>nd</sup> tier Committee will resolve those complaints/ grievances that are not resolved directly by the first-tier WASA designated Committee. In such cases, the first tier Committee will provide all the relevant data to the second tier Grievance Redress Committee

and GRC will suggest the corrective measures and assign clear responsibilities for implementing its decision within 10 working days, depending on the nature of the grievance. An office order for the constitution of the second tier Committee has been issued with the approval of the Managing Director, WASA vide no PD/LWWMP/ WASA/198-206 dated 13.4.2023.

### 6.5. Three-Tier Grievance Redressal Mechanism (GRM) for Execution Phase

The Three-Tier GRM (Grievance Redressal Mechanism) for the Project is established in LWASA to provide a time-bound, early, transparent, and fair resolution for grievances. The Environment and Social (ES) staff of PMU will conduct public awareness campaigns on the GRM, with the support of ES staff of PMC (Project Management Consultant) and LWASA. All complaints received, whether verbal or in writing, will be properly documented and recorded in the Complaint Management Register(s) placed at GR Cell. The focal point responsible for receiving grievances will be Project Director, Project Management Unit, Lahore Wastewater Project, LWASA, contact number, +92-333-3330287, +92-42-9926843, Email Address: [ProjectDirector.LWWMP@gmail.com](mailto:ProjectDirector.LWWMP@gmail.com). This will enhance the overall communication between the Project affected persons and the Project Management Unit.

PMU will install a complaint box in the office and the Contractor will install a box in the field office, PMU assign a dedicated telephone number for the registration of complaints. PMU will also designate a staff who will be the focal point to record the complaints and report to PMU and concerned offices. At the construction site, a Grievance Redress (GR) Cell will be established to address the grievance at the site before the execution phase of the project. A comprehensive grievance redress process regarding land, compensation and other compensation is described in Table 10 and the grievance resolution flow mechanism is given in Figure 1.



**Figure 1 Grievance Redress Mechanism during Execution Phase of the Project**

### 6.6. First Tier of GRM

A Grievance Redress (GR) Cell will be established at the construction site to address the grievances at the site prior to the execution phase of the project. This will serve the purpose of first-tier GRM. The GR Cell will be comprised of the Manager E&S PMU, environment manager, and social manager of the EPC contractor and resident engineer, and HSE officer of PMC and one community representative. This cell will be the fastest and most accessible

grievance redress forum for redressing the complaints on-site. Complaints will be resolved within seven (7) working days, depending on the nature of the grievance, however, most of the complaints will be addressed promptly at the site, preferably on a daily basis. In case the complaints are not resolved by GR Cell, complaints will be forwarded to the second-tier Grievance Redress Committee (GRC). The composition of the GR Cell is given in Table 8 and will be notified prior to the execution phase of the project.

**Table 8 Composition of Grievance Redress Cell (First-Tier)**

<b>S. No.</b>	<b>Designation/Department</b>	<b>Office</b>
1	Manager E&S, PMU Larech	Chair of the Committee
2	Resident Engineer, Project Management Consultant (PMC)-L	Member (Secretary)
3	Health Environment Safety (HSE) officer of PMC	Member
4	Environment Manager EPC Contractor	Member
5	Social Manager EPC Contractor	Member
6	Community Representative	Member

Efforts will be made to address concerns and grievances at the local level by the ES staff of PMU, PMC (Project Management Consultant), or through the involvement of representatives of the APs Committee and informal mediators. The ES staff of PMU and PMC may seek additional support and guidance from LWASA (Water and Sanitation Agency Lahore) in grievance redressal matters. Investigation of grievances will involve site visits and consultations with relevant parties to identify and reach a realistic picture of grievances.

The functions of the GRC include resolving problems, recommending possible solutions and providing support to affected persons arising from various social, resettlement, and environmental issues such as land acquisition (temporary or permanent) if any, asset acquisition, eligibility for entitlements, compensation, damages, resettlement assistance, as well as environment-related issues such as dust, noise, utilities (electric power, gas, telephone optical fiber, water supply), waste disposal, traffic interference, access, and public safety. The GRC will reconfirm grievances of APs, categorize and prioritize them, and aim to provide solutions within 7 working days. The ES staff of PMU will be responsible for processing and presenting all relevant documents, field inquiries, and evidence/proofs to the GRC, maintaining a database of complaints, recording decisions, issuing minutes of meetings, and monitoring to ensure that formal orders are issued and required actions against decisions are being carried out. The PMC and EPC Contractor ES staff will assist PMU in these tasks as and when required.

Grievances will be documented, and personal details of the complainant (such as name, address, date of complaint, nature of complaint, etc.) will be included unless anonymity is requested. A tracking number will be assigned for each grievance, and it will include the following elements:

- i. Initial grievance sheet: This will include a description of the grievance, and an acknowledgement of receipt will be handed back to the complainant when the complaint is registered, either verbally or in writing.
- ii. Grievance monitoring sheet: This will mention the actions taken, such as investigation and corrective measures.
- iii. Closure sheet: One copy of this sheet will be handed over to the complainant after they agree to the resolution and sign-off on it

## 6.7. Second Tier of GRM

The second tier of GRC will be established at PMU level. The Committee will comprise of the PD, E&S staff of PMU, PMC & EPC Contractor. Complaints will be resolved within ten (10) working days, depending on the nature of the grievance. A second tier of the Grievance Redressal Committee (GRC) will be notified prior to the execution phase for the Project to resolve the concerns and grievances of Affected Persons. If necessary, this committee will consult with all relevant parties (e.g., Affected Persons, the general public, women, and relevant government departments) to resolve the issues. The composition of the second-tier Committee is given in Table 9.

**Table 9 Composition-PMU Level GRC (Second-tier of GRM)**

S. No.	Designation/Department	Office
1	Project Director, PMU Larechs	Chair of the Committee
2	Manager E&S, PMU Larechs	Member (Secretary)
3	Representative of E&S staff of PMC	Member
4	Representative of E&S staff of EPC Contractor	Member
5	Community Representative	Member

The ES staff of PMU will organize training on GRM and grievance registration and handling procedures, in coordination with the ES staff of PMC, for LWASA to familiarize them with the process. The contractor will develop a code of conduct for GBV, SEA and will be bound to implement it in letter and spirits. The second tier GRC will meet as necessary when there are grievances to be addressed and will aim to resolve problems and provide support to affected persons within 10 working days, depending on the nature of the grievance.

## 6.8. Third Tier of GRM

The third tier of the Grievance Redress Mechanism (GRM) is the Grievance Redress Committee (GRC), will be established by LWASA (Water and Sanitation Agency) prior to the execution phase of the Project to resolve the concerns and grievances of affected persons. The GRC will be chaired by the Managing Director, WASA. The GRC consists of the Managing Director (MD), LWASA Deputy Managing Director (Engg), LWASA, Project Director, Project Management Unit (PMU), LWWMP, and any other co-opted member. The Committee will resolve those complaints/ grievances that are not resolved directly by the second –tier designated Committee at PMU Level. In such cases, the second tier Committee will provide all the relevant data to the third tier Grievance Redressal Committee and GRC will suggest the corrective measures at the field level and assign clear responsibilities for implementing its decision within 15 working days, depending on the nature of the grievance (in case the solution is possible within the prescribed time). An office order for the constitution of the third tier Committee will be issued prior to the execution phase with the approval of the Managing Director, WASA. The proposed structure of the third tier Grievance Redressal committee is provided in Table 10.

**Table 10 Structure-Grievance Redressal Committee (Third tier GRC)**

S. No.	Designation/Department	Office
1	Managing Director WASA, Lahore	Chair of the Committee
2	DMD Engineering, WASA, Lahore	Deputy Chair
3	Project Director (LWWMP)	Member
4	Manager E&S PMU	Member (Secretary)
5	Any other co-opted member	Member

If the complainants are dissatisfied with the decision of the GRC, they still have access to approach the Government's Administrative or Court of Law for judicial remedies. GRC-PMU will maintain a database of complaints and their resolution status at each level and report grievance resolution status updates, GRM-related data in semi-annual safeguard monitoring reports, and monthly monitoring reports to AIIB.

## 6.9. Functions of GRC

The following are the functions of GRC:

- The first tier GR cell will provide and maintain record of all grievances received at tier-one level (site).
- Tier one GRC will promptly register any received complaint and will be responsible for redressing the issue within 7 working days of receipt of complaint.
- In case the complaints are not resolved by GR Cell, complaints will be forwarded to the second-tier Grievance Redress Committee (GRC).
- Second-Tier GRC will review the complaint and will be responsible for redressing the issue within 10 working days of receipt of complaint.
- In case the complaints are not resolved by Second-Tier GRC, complaints will be forwarded to the third-tier Grievance Redress Committee (GRC).
- The third-tier Committee will resolve or communicate its decision within 15 working days for the complaints/ grievances which are not resolved directly by first and second tiers.

The aim of the Grievance Redressal Committee (GRC) will be as follows:

- i. Ensure effective implementation of the Grievance Redressal Mechanism for concerns and issues falling under their jurisdiction.
- ii. Provide easy access to the Grievance Redressal Mechanism, allowing grievances to be filed verbally, by phone, in writing, or via web-based provisions, including the option to submit grievances anonymously.
- iii. Address and resolve all referred grievances in a timely and impartial manner within 10 working days of receipt.
- iv. Deal promptly with issues related to:
  - Resolving day-to-day site issues related to E&S aspects,
  - recommending possible solutions,
  - providing support to affected persons arising from various social, resettlement, and environmental issues such as land acquisition (temporary or permanent) if any,
  - asset acquisition,
  - eligibility for entitlements,
  - compensation,
  - damages (if any),
  - resettlement assistance, as well as environment-related issues such as dust, noise, utilities (electric power, gas, telephone optical fiber, water supply),

- waste disposal,
  - traffic interference,
  - access, and public safety
  - any other related matter
- v. Seek assistance from other persons or institutions when needed.
  - vi. Inform about GRC and AIIB accountability mechanisms to APs.
  - vii. Record and reply to aggrieved parties/persons with speaking orders/minutes of meetings/decisions of the committee, keeping a copy as a record.
  - viii. The decision/judgment made by GRC will be communicated to Aggrieved Persons and the E&S team of the Bank in monitoring reports.
  - ix. Provide the option to the aggrieved parties to file an appeal for review of the decision / Judgment of the GRC within 10 working days of receiving the review matter, and the GRC may reconsider the matter/ case or refer the case to the appropriate forum after examining the appeal.
  - x. In such cases where grievances cannot be resolved by the GRC, the affected person can seek alternative redressal and approach higher Administrative Authorities or the court of law, as appropriate.

Court: If the project-level GRM will not be able to resolve the grievance or the complaining party is not satisfied with the decision, it will be resolved as per law and court order of Pakistan which will be outside of the project GRM scope. The GRC cannot impede AP's access to the legal system, according to ESF. Thus, an AP can approach the courts at any time in accordance with the applicable legal provisions as per Section 18 of the Land Acquisition Act 1894. Implementing the GRC's decision will be contractually binding on the contractor. Also, if not satisfied with the resolution of the issue by project-level GRM, the complaining party can send the complaint to AIIB's Accountability Mechanism discussed below, after making good faith efforts to resolve the grievance with AIIB's operation department.

#### **6.10. AIIB's Accountability Mechanism**

Affected persons and people in the project areas will also be informed about the AIIB's Accountability Mechanism, and that they should at first put good faith efforts into resolving the complaints on the project level and the project implementing agencies in the country. Two or more APs (can be from the same family) can submit their complaint to AIIB's Accountability Mechanism (AM). The AM is a last resort mechanism. The project-affected persons will first address the issue with the project-level GRM, and then they will make good faith efforts to address the issue with the relevant AIIB operations department. Complaints will not be eligible in certain cases such as:

- About actions not related to something AIIB did or did not do in formulating, processing, or implementing an AIIB-assisted project;
- About an AIIB-assisted project for which 2 or more years have passed since the loan or grant closing date;
- About matters those complainants have not made good faith efforts to address with the operations department concerned;
- About decisions made by AIIB, the borrower or executing agency, or the private sector client on the procurement of goods and services, including consulting services; and allegations of fraud or corruption in AIIB-assisted projects (these will be managed by other facilities).
- The complaint may be submitted by mail, fax, email, or in person to:

Complaint Receiving Officer (CRO), Accountability Mechanism Asian Infrastructure  
Investment Bank (AIIB), Tower A, Asia Financial Center, No.1 Tianchen East Road,  
Chaoyang District, Beijing 100101  
Phone, +86-10-8358-0000,  
Fax Number: +86-10-8358-0003 and  
Email: ppm@aiib.org