

**Reconstruction of National Highway N-5 under Pakistan's
Resilient Recovery, Rehabilitation and Reconstruction
Framework Project – Phase 1A**

**Draft Environmental and Social Action Plan
(ESAP)**

April 20, 2025

Project ID: P000913

**Reconstruction of National Highway N-5 under Pakistan's
Resilient Recovery, Rehabilitation and Reconstruction
Framework Project – Phase 1A**

Environmental and Social Action Plan (ESAP)

This Environmental and Social Action Plan (ESAP) outlines the measures and actions that the Reconstruction of National Highway N-5 under Pakistan's Resilient Recovery, Rehabilitation and Reconstruction Framework Project – Phase 1A (the Project) will undertake to ensure compliance with the AIIB's Environmental and Social Policy (ESP)/ Environmental and Social Framework (ESF). This document will be part of the financing agreement between National Highway Authority (NHA) Government of Pakistan (GoP) and the Asian Infrastructure Investment Bank (AIIB).

Project:

The project will involve the detailed design for improvement and widening of N5 which will facilitate the movement of various types of traffic on N5 and increase the traffic-carrying capacity of the road and reduce traffic congestion in major urban areas. The Project has been divided into following eight (08) Sections i.e., Section # 01: Hyderabad to Hala, Section # 02: Ranipur to Rohri, Section # 03: Okara to Manga, Section # 04: Lahore to Gujranwala, Section # 05: Kharian to Dina, Section # 06: Dina to Rawat, Section # 07: Rawalpindi to Burhan, and Section # 08: Nowshera to Peshawar.

The Government of Pakistan (herein after the **Recipient**) is implementing the Reconstruction of National Highway N-5 under Resilient Recovery, Rehabilitation and Reconstruction Framework Project – Phase 1A (the **Project**). The Project Implementation Unit under the National Highway Authority of Pakistan Government will be the **Implementation Agency (IA)** for the project.

The AIIB will provide financial support to the GoP through a Multi-Phase Program (MPP) approach Phase 1 which is further divided into Phase 1A and Phase 1B projects. The Phase 1A includes Section #2, Section#7 and Section# 08, while Phase 1B includes Section#04 alongside the reconstruction of the Nai Baran Bridge located southwest of Hyderabad in Sindh province.

The ESAP includes specific actions, timelines, responsible parties, and resource requirements to implement the ESF and Environmental and Social Standards (ESSs) based on the E&S assessment including Environmental and Social Management Planning Framework (ESMPF), Stakeholder Engagement Plan (SEP), Resettlement Policy Framework (RPF), Gender Action Planning Framework (GAPF) Labour Management Plan (LMP), Environmental and Social Impact Assessment/ Environmental and Social Management Plan (ESIA/ESMP), and Resettlement Action Plan (RAP) of Phase 1A, undertaken and corresponding actions identified and agreed upon.

The ESAP, as presented in the table below has been agreed upon by the Bank. ESAP sets out: (a) commitments to implement the actions identified following an appropriate time-bound manner, in conformity with the AIIB's ESP, ESF, Environmental and Social Exclusion List (ESEL), and applicable ESSs and Project's ES documents including ESMPF, SEP, LMP, RPF, GAPF, and ESIA/ ESMP and RAP; (b) estimates the resources required; (c) responsibilities for implementation of the actions, (d) timeline, and (e) monitoring approach.

The environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESSs, and in form and substance, and in a manner acceptable to the AIIB. Unless otherwise defined in this ESAP, capitalized terms used in this ESAP have the meanings ascribed to them in the referred agreement.

Implementation of the material measures and actions set out in this ESAP will be monitored and reported to the AIIB as required by ESAP and the conditions of the legal agreement, and the AIIB will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.

As agreed by the AIIB and Government of Pakistan, this ESAP will be revised from time to time if necessary, during project implementation to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Project Implementing Entity and the AIIB agree to update the ESAP to reflect these changes through an exchange of letters signed between the ESAP and the Project Implementing Entity. The Project Implementing Entity shall promptly disclose the updated ESAP.

Environmental and Social Action Plan

No.	Action/Measure	Resources (Responsibility)	Timeframe/ Target Date	Performance Indicator /Monitoring Requirement
1.	<p>Organizational Structure</p> <ol style="list-style-type: none"> 1. Project will recruit and depute qualified staffs and resources to monitor E&S impacts and risks and implementation of RAP, both at the PIU-HQ level and at the field RIU level. <ol style="list-style-type: none"> a. PIU-HQ level specialists: <ul style="list-style-type: none"> • One Environment Specialist, • One OHS Specialist, • One Resettlement and Social Safeguard Specialist. • One Stakeholder Engagement/Public Relations Specialist • One Climate Change Specialist, and • One Gender Specialist. b. Specialists at each RIU (Section): <ul style="list-style-type: none"> • Resettlement & Social Safeguard Specialist (3 nos), • Gender Specialist, • Labour Management Specialist, • OHS Specialist, • Environment Specialist, and • Climate Specialist. 2. Supervision Consultant (SC) and contractor(s) will appoint qualified E&S Specialist with all necessary material resources, which will support in environmental and social supervision and monitoring including the development of ES related documentation etc. as required. 	<p>NHA PIU & RIUs</p> <p>Preference will be given to NHA in-house engineering staff with a construction background for the roles of Environment and OHS Specialists at both PIU-HQ and RIU.</p>	<p>The organizational structure, including the appointed specialists, must be established</p> <p>Within 90 days of Project effectiveness and at least 60 days before issuing the first bidding document or procurement order.</p> <p>This structure, should be maintained throughout the Project implementation.</p>	<p>Environmental and Social Specialists are onboard (at PIU-HQ and RIU each Section),</p> <p>E&S Staff of SC and contractor(s) are onboard prior to project civil works.</p>

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	<p>3. The Construction Supervision Consultant (CSC) will appoint the following ESHS Specialists with the required qualifications and training as per the ESMP. These specialists will oversee the implementation of the RAP, C-ESMP, and OHSMP to ensure compliance and effective execution:</p> <ul style="list-style-type: none"> a. Int'l Environment, Health and Safety Specialist b. National Consultants <ul style="list-style-type: none"> o Environmental Specialists (3 nos) o Occupational Health and Safety Specialists (4 nos) o Resettlement Specialists (3 nos) o Social Specialists (including LMP and SEA/SH) (3 nos) o Communication Specialist (3 nos) o EHS Supervisors (12 nos) o Social Surveyors (4 nos) 	As part of Supervision Consultant Team	Before commencement of the civil works	ESHs Staff of CSC are onboard prior to the commencement of civil works.
	<p>4. Contractor(s) will appoint the following ESHS Specialists with all necessary education, qualification and trainings, which will implement C-ESMP and OHSMP including the development of EHS related documentation etc. as required:</p> <ul style="list-style-type: none"> o International EHS Manager o Environmental Specialist (3 nos) o Social Specialist (SEA/SH, 3 nos) o OHS Specialists (7 nos, 3 for Section 2 and 2 each for Sections 7 and 8) o Community Liaison/Communication Officer (2 nos) o EHS Supervisors (7 nos, 3 for Section 2 and 2 each for Sections 7 and 8) o Flagman (9 nos, 5 for Section 2 and 2 each for Sections 7 and 8) 	As part of Contractors' Team	Before commencement of the civil works	<ul style="list-style-type: none"> • Mobilize ESHS staff in advance to develop the C-ESMP and OHSMP before civil works commence. • Ensure all candidates meet the qualification criteria outlined in the ESMP for their respective positions.

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	<ul style="list-style-type: none"> Medical Doctors (3 nos with PMDC Licensed and all medical facilities including ambulance) Medical Technicians (4 nos, 2 for Section 2 and 1 each for Sections 7 and 8) 			<ul style="list-style-type: none"> Submit CVs for review and approval by the CSC prior to deployment. Contractors' ESHS staff may not be mobilized without explicit approval from the CSC.
2.	ES requirements in PIM Ensure Project Implementation Manual (PIM) contains the ES requirements, standards, criteria, codes, processes and procedures to be followed, as well as responsibilities and timeline.	PIU-HQ and RIUs with support from ES specialist/	As part of PIM drafting.	PIM has satisfactory ES content.
3.	Training and Capacity Strengthening. Based on ES documents of the Project, provide trainings / orientation and awareness to the relevant targeted groups such as PIU and RIU staff, stakeholders, communities, Project workers, Contractors, Sub-contractors. Exact nature of training and the target group may be adjusted as per the site condition and need during implementation.	ES staff of PIU, RIU, CSC and Contractor CSC budget and Project budget	Prior to initiation of project activities and then conducted periodically throughout project implementation.	Tailored trainings to different groups organized at different times as agreed with PIU/RIU and advised by CSC. Training Record of each session.

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4.	Undertake a strategic institutional E&S capacity assessment and strengthening with the support of international environmental and social specialists, providing recommendations on institutional strengthening, staffing needs and qualifications, E&S systems including ESMS development, resource requirements, training, exposure visits, and overall system functionality.	NHA/PIU (Scope of International Social and Environmental Specialist)	December 2025 (or as per agreed work plan of the international consultants)	Institutional Capacity Assessment Report
5.	Integration of ES considerations into bidding documents: Confirm through review by International E&S Specialists that the technical plan and design, detailed Project Reports, and bidding documents reflect Employer's ESHS requirements, technical specifications, and BoQ. Thereafter ensure that the contractors comply with the ESHS requirements of their respective contracts.	PIU (engage Project technical team and ES team, international E&SES specialists, PIU-HQ and RIU)	Before finalizing and issuing bidding document	Bidding documents incorporates ESHS incorporates ES aspects.
6.	Supervision, Monitoring and Reporting Prepare and submit to the Bank regular Progress reports on environmental, social, health and safety status and performance/ compliance, including but not limited to the implementation of the ESAP, RAP, OHSMP, C-ESMP, status of preparation and implementation of E&S management tools /documents required under the ESAP, site observations on contractors performance on implementation of environmental, social and health and safety measures as well as stakeholder engagement activities, functioning of the grievance mechanism, training & capacity building activities etc.	PIU and RIUs (support from CSC)	Quarterly reports prepared and submitted to the Bank on an agreed format not later than 15 days after the end of each quarter. The reporting will be throughout the project implementation. Copies of all quarterly reports to Provincial EPAs.	Timely and quality E&S periodic Reports
7.	Occupational Health and Safety Require contractors to follow fit-for-purpose occupational health and safety (OHS) measures considering the site condition and	ES specialist jointly with procurement	During construction (measures in the bidding	Satisfactory OHS at work sites.

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	nature of work. Organize induction, tailored OHS training, and toolbox talk. Training as required during implementation.	and technical specialist	document finalizing documents). before bidding	Contractors' report and CSC Report.
8.	Pollution Prevention Require the contractor to implement pollution control measures, including dust suppression, noise reduction, and waste management. Require Contractor to optimize water and energy use during construction and operations.	PIU/ RIU with CSC support.	During construction.	Satisfactory pollution prevention at site. Contractor Report and CSC Report
9.	Contractors C-ESMP, OHSMP, and Monthly Report Ensure Contractor prepares Contractor's Environmental and Social Management Plan (C-ESMP) and Occupational Health and Safety Management Plan and reviewed and approved by the CSCPIU prior to the commencement of construction at sites. (including various relevant plans as identified in the ESIA/ESMP and RAP and other E&S documents, such as Traffic Management Plan (TMP), Emergency Response Plan, etc.), Gender Action Plan etc. Ensure Contractors (also covering the activities undertaken by its sub-contractors) provide monthly monitoring reports to the CSC and RIU (Sections) on the implementation of relevant measures of C-ESMPs, OHSMP, and related plans such as, but not limited to, the Plan, TMP, Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Mitigation Action Plan, Waste Management Plan, Community Health and Safety Plan, Contractor- Labor Management Plan, etc.	Contractor(s)	Key Performance Indicators on the last day of each month. Monthly reports within seven days of end of calendar month and throughout project implementation.	Monthly Key Performance Indicators as per the OHS Framework to CSC. Timely and quality E&S monthly Reports.

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10.	Incidents and accident monitoring and reporting Promptly notify the Bank of all fatality and high potential (Level 4) ¹ incident, which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including incidents that could result in fatalities, injuries, gender-based violence, etc. Provide sufficient detail regarding the incident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and CSC, as appropriate. Subsequently, prepare a Root-Cause Analysis (RCA) report on the incident and corrective action plan (CAP) to prevent its recurrence.		Notify the Bank through a flash report within 24 hours after learning of the fatal/ high potential incident. Promptly and no later than seventy-two hours after taking notice of the Project-related incident or accident. Provide RCA within 7 days of all the incident.	Submission of incident Flash Report Submission of RCA report.
11.	Independent Monitoring: Hire Third-Party Validation (TPV) Consultant for monitoring and evaluation of ES requirement	PIU	Biannual (six-monthly reports including annual, and final evaluations) throughout the project lifecycle	Monitoring and Evaluation Report
12.	Country Regulatory Requirements Ensure all necessary regulatory requirements under the country system are fully complied with in timely manner, including permission, no objection certificates, licenses etc., are duly obtained. This may include, but not limited to, securing all required environmental clearance from relevant EPAs, permits	PIU/RIUs	Before launching the bidding process and start of construction activities, as applicable.	Copies of permits and approvals as obtained

¹ Fatal and high potential incident leading to fatality

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	and licenses from the relevant regulatory authorities; No Objection Certificates (NOC), if relevant, from Capital Development Authority (CDA), Provincial Forest Departments, Islamabad Wildlife Management Board (IWMB), new borrow pits and other agencies, before initiating interventions at a site including tree felling. Ensure that these agencies are timely and regularly consulted upon.			
13.	Comply with NOC or cause to comply as up to date with the conditions as established in these permits, NOCs, permission throughout project implementation.	PIU/RIUs	Throughout Project implementation.	NOC Compliance Reports
14.	<p>Noise baseline, modelling and mitigation</p> <p>Building on the noise level measurement undertaken during preparation, undertake a detailed, comprehensive noise level baseline measurement particularly in all sensitive receptors, undertake modelling to forecast operation level noise, and recommend site specific appropriate noise mitigation measures.</p> <p>Meaningful consultations with representatives of sensitive receptors must be conducted before determining mitigation measures to ensure their endorsement or majority support.</p>	PIU/RIUs with support from Noise Modeling Consultant	During commencement of the project civil works (completed before completion of 50% of physical progress)	Modeling is carried out with the site specific noise mitigation measures.
15.	<p>Biodiversity Risks and Impacts</p> <p>Adopt and implement mitigation measures to safeguard biodiversity and habitat included in ESIA's</p>	PIU/RIUs	Adopt and implement biodiversity and habitat mitigation measures throughout the Project implementation.	Measures are implemented at site

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16.	<p>Resource Efficiency and Pollution Prevention and Control Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes. Ensure necessary permits/agreements are in place for the disposal/transfer of waste to be generated in construction. Designate a proper temporary waste storage area. Keep track of waste disposal record with a waste register. Keep an inventory of hazardous materials with all necessary documentation in place.</p> <p>Implement resource efficiency and pollution prevention and management measures as mentioned in the ESIA.</p>	PIU/RIUs	<p>Adopt the WMP prior to the mobilization of construction contractors, and thereafter implement the WMP throughout Project implementation.</p> <p>Throughout Project implementation.</p>	Periodic monitoring report with dedicated section on <i>Resource Efficiency and Pollution Prevention and Control</i>
17.	Perform Environmental Monitoring for Air Quality, Noise Level and Water Quality as per the plan provided in the ESIA. Update the plan based on the monitoring results, if required.	PIU/RIUs	Throughout Project implementation.	Periodic monitoring report
18.	<p>Tree Cutting and Compensatory Plantation Comply with the required country regulatory requirements related to tree felling (including from the maiden and road edge) for example environmental clearances from EPAs, NOC from Forest Departments, or any other agency.</p>	PIU/RIUs (Support from CSC and Contractors)	Before commencement of the project civil works	Tree cutting inventory record and plantation inventory as per the tree plantation plan suggested in ESIA/ESMP

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19.	Identify sites for compensatory plantation and prepare detailed Compensatory Plan for each proposed site. Carry out plantation activities and ensure proper maintenance, including care of planted saplings/seedlings and replacement of any that do not survive.	Assess whether sufficient land available for planting of saplings recommended in the ESMP	During implementation of project	Plantation Plan Reporting as suggested in ESIA/ESMP
20.	Chance Finds Implement chance finds procedures as provided in the ESIA report.	PIU/RIUs (Support from CSC and Contractors)	Implement the procedures throughout Project implementation.	Periodic monitoring report with dedicated section on <i>Chance Find</i>
21.	Land Acquisition and Resettlement Prepare, consult, disclose, adopt and implement the RAPs of Section 2, 7 and 8 consistent with the ESS 2. For roads where RAPs have not yet been implemented, the PIU/RIUs shall prepare, disclose, consult upon and adopt a Resettlement Action Plans (RAPs) based on RPF orientations, once site-specific locations of rehabilitation/construction works (roads, bridges, culvert, etc.) are determined. Develop and implement the arrangements for the grievance mechanism for resettlement (established as per the overall grievance mechanism as per ESP). Full compensation will be paid to affected parties/ households/ persons before any civil works is commenced and/or displacement takes place	PIU/RIUs (Support from CSC)	RAP developed or updated, and implemented (i) before issuing the Request for Proposal for any contract involving works (ii) prior initiating activities that involve involuntary resettlement Prior to commencement of resettlement activities Prior to displacement and/or civil works	RAP Implementation and GRM Reporting Quarterly progress reports, completion reports tied to the release of land for construction and a RAP completion report upon completion of the RAP

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	Conduct regular monitoring of resettlement activities through an independent monitoring agency or consultants in a manner acceptable to the Bank.		.	
22.	Stakeholder Engagement Adopt and implement the Stakeholder Engagement Plan (SEP) for the Project, consistent with ESP, which includes measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	PIU/RIUs (Support from CSC and Contractors)	Adopt the SEP before Project effectiveness and thereafter implement the SEP throughout Project implementation	Periodic monitoring report with dedicated section on <i>SEP</i>
23.	Project Grievance Mechanism Establish and disclose a grievance redress mechanism (GRM) at the project (PIU) level and other levels (RIU and local) including disclosure of AIIB's Project-affected People's Mechanism (PPM). Maintain and enhance the established Grievance Redress Mechanism (GRM) to ensure accessibility, transparency, and effectiveness in addressing concerns and grievances related to the Project in a manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESP. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-cantered manner.	PIU/RIUs (Support from CSC and Contractors)	Adopt the GRM before Project effectiveness and thereafter implement the GRM throughout Project implementation	Periodic monitoring report with dedicated section on <i>GRM</i>

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	principles of proportionality, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.			
26.	Traffic and Road Safety Incorporate measures to manage traffic and road safety risks as required in the ESIAs and ESMPs prepared under proposed project	PIU/RIUs (Support from CSC and Contractors)	Same timeframe as for the adoption and implementation of the ESIAs and ESMPs.	Periodic monitoring report with dedicated section on traffic and road safety Incident accident reporting
27.	Capacity Support Implement the capacity building plan/trainings for the project staff and contractors as per the capacity building report/plan prepared by the International ES consultants	PIU/RIU (support from CSC and International ES consultants)	First training prior to the project effectiveness and periodically throughout the project	Training materials developed and evaluation reports
28.	Preparation of ES Documents for Phase 1B Prepare the necessary Environmental and Social (ES) documents/instruments for Phase 1B in accordance with the Environmental and Social Management Planning Framework (ESMPF), ensuring compliance with AIIB's policy requirements and relevant national regulatory requirements.	PIU/NHA	After 6 month of mobilization of Phase 1A contractor	Disclosure of E&S documents