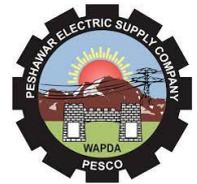




Government of Pakistan



Ministry of Energy
Power Division
Government of Pakistan



Stakeholder Engagement Plan (SEP)

Electricity Distribution Efficiency Improvement Project
(P170230)

EDEIP

November 2021

Acronyms

AP	Affected Persons
ABC	Aerial Bundled Cables
AMI	Advanced Metering Infrastructure
APCs	Affected Persons Committees
BODs	Board of Directors
BPC	Bhutan Power Corporation
BREB	Bangladesh Rural Electrification Board (BREB)
CD	Circular Debt
CDMP	Circular Debt Management Plan
CEB	Ceylon Electricity Board
CPPA-G	Central Power Purchasing Agency-Guarantee
CSC	Construction and Supervision Consultant
CTBCM	Competitive Trading Bilateral Contract Market
DISCOs	Distribution Companies
DMS	Distribution Management Systems
EDEIP	Electricity Distribution Efficiency Improvement Project
EDTIP	Electricity Distribution and Transmission Improvement Project
EOBI	Employees' Old-Age Benefits Institution
ERP	Enterprise Resource Planning
ESC	Environmental and Social Cell
ESRS	Environmental and Social Review Summary
EIA	Environmental Impact Assessment
ELR	Energy Loss Reduction
ESCP	Environmental and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESSs	Environment and Social Standards
GBV	Gender Based violence
GDP	Gross Domestic Product
GIS	Geographic Information System
GoP	Government of Pakistan
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
GS	Grid Station
HESCO	Hyderabad Electric Supply Company
HTLS	High-tension low sag
IA	Implementing Agency
IAA	Independent Auction Administrator
IESCO	Islamabad Electric Supply Company
ISMO	Independent System and Market Operator
K-Electric	Karachi Electric Supply Company
KII	Key Informant Interview
KPI	Key Performance Indicator
LAC	Land Acquisition Collector
LAR	Land Acquisition and Resettlement
LESCO	Lahore Electric Supply Company
LMP	Labor Management Procedures

M&E	Monitoring and Evaluation
MIRAD	Market Implementation and Regulatory Affairs Department
MoE-PD	Ministry of Energy Power Division
MUET	Mehran University of Engineering and Technology
NEP	National Electricity Policy
NEPRA	National Electric Power Regulatory Authority
NTDC	National Transmission and Dispatch Company
PACE	Program for Affordable and Clean Energy
PAI	Project Area of Influence
PAP	Project Affected Persons
PCB	Poly Chlorinated Biphenyl
PD	Power Division
PEDO	Pakhtunkhwa Energy Development Organization
PHPL	Power Holding Pakistan Limited
PIC	Project Implementation Consultant
PIMSC	Project Implementation & Management Support Consultant
PMDU	Prime Minister's Performance Delivery Unit
PPMC	Power Planning and Management Company
PS&C	Planning, Scheduling and Coordination
PSC	Project Steering Committee
RISE	Resilient Institutions for Sustainable Economy
RoW	Right of Way
SADO	Social Awareness and Development Organization
SAGE	South Asia Gender and Energy Facility
SEA	Sexual Exploitation and Abuse
SHIFT	Securing Human Investment to Foster Transformation
SIDA	Sindh Irrigation and Drainage Authority
SOE	State-owned Enterprises
SCADA	Supervisory Control and Data Acquisition
SMS	Short Message Service
SSF	Safco Support Foundation
SSO	Sub Station Operator
STEM	Science, Technology Engineering, and Mathematics
STG	Secondary Transmission and Grid
WAPDA	Water and Power Development Authority
WEP	Women Engineers Pakistan
WiEP	Women in Energy Pakistan
WB	World Bank

Executive Summary

The EDEIP (Electricity Distribution Efficiency Improvement Project) will support the targeted DISCOs (herein after called Implementing Agencies (IAs) in strengthening and modernizing their electricity distribution network and operations, which should result in improved efficiency and reliable supply to the consumers. The Ministry of Energy-Power Division (MoE-PD) and three DISCOs namely Hyderabad Electricity Supply Company (IAs), Multan Electric Power Company (MEPCO), and Peshawar Electric Supply Company (PESCO) have been selected. The Project will help these DISCOs to modernize and improve their service delivery. In addition to strengthening the transmission and distribution network to ensure reliable supply of electricity by increasing the load carrying capacity under Component 1 of EDEIP, the Project through Component 2 will help improve financial viability of the DISCOs by installing Aerial Bundled Cables (ABCs) and Transformer Monitoring System in some of the high revenue/high loss feeders. Component 2 will also help DISCOs expand/start their AMI program and deploy latest technology and information systems/IT infrastructure for improved planning, management and operations of the assets and improved customer service. Component 3 of the Project will help improve operations and maintenance practices through the use of latest tools and equipment and training to enhance safety culture during construction, operations and maintenance activities; provide technical assistance for training, studies, preparation of manuals, pilot projects and support project implementation. Component 4 is to support Power Division/Government of Pakistan in implementing the sector reforms and improve sector governance.

The Project beneficiaries are all electricity consumers including residential, agricultural, commercial and industrial who will benefit from improved supply and service delivery. Increasing the reliable supply of electricity will contribute to economic development and ease of doing business. The Project will also help improve DISCOs financial health and reduce the reliance on the Government's support to help create the fiscal space for spending on other sectors of the economy.

The project development objectives are to improve electricity supply and operational efficiency in targeted areas of selected distribution companies and support the Ministry of Energy to implement reforms.

The project components are described as follows:

Component 1 - Improving Grid Reliability

This component will finance investments in Secondary Transmission and Grid (STG) and Energy Loss Reduction (ELR) programs of the DISCOs to improve reliability of electricity supply and reduce technical losses.

Component 2: Modernizing Operations and Management

This component will support modernization of the DISCOs operations and management functions using latest equipment, technology and information systems.

Component 3: Capacity Building & Technical Assistance

This component will help build capacity of the DISCOs with particular focus on improving operations and maintenance; training, capacity building and improving gender diversity. It will also support project implementation.

Component 4: Reform Support

Component 4 will support MOE-PD and GoP to implement power sector reforms and improve sector governance.

Stakeholder Engagement Plan

The Stakeholder Engagement Plan is one of the Environmental and Social management documents which has been prepared by the implementing agencies (IAs), namely **Ministry of Energy (MoE-PD), Hyderabad Electricity Supply Company (HESCO), Multan Electric Power Company (MEPCO), and Peshawar Electric Supply Company (PESCO)**.

Under World Bank-financed projects, a **Stakeholder Engagement Plan (SEP), and project level Grievance Redress Mechanism (GRM) need to be developed in accordance with ESS10 (Stakeholder Engagement and Information Disclosure) of the World Bank's Environmental and Social Framework (ESF) and any corresponding national legislation**. The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. **The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project.**

Project stakeholders are defined as individuals, groups or other entities who:

- i. are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
- ii. may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

The three categories of stakeholders as per the ESS10 are outlined below:

- a. **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI)¹ that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Under this project this group is category is comprised of the three implementing agencies, individual Customers/ Electricity users in the project areas, people affected by land acquisition if any, or by other environmental and social impacts, and private entities affected by the project.
- b. **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Under EDEIP other government departments and entities such as Agriculture, Forestry, Irrigation, Labour, Revenue departments fall under this ambit, along with Provincial EPAs. Other interested parties include relevant NGOs, local CSOs, academia, media etc.
- c. **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status², and that may require

¹ This refers to the overall project area under the jurisdiction of each DISCO as well as subproject locations which may have direct or indirect impacts due to project activities in these locations.

² Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. The vulnerable or disadvantaged groups may include, but are not limited to Women Employees of the three DISCOs, women in the energy sector in Pakistan, Internally displaced people in KP if there are any, elderly employees, elderly citizens, disabled employees, disabled citizens, minorities and Transgender people.

Specific stakeholder needs and requirements have to be considered when engaging with different groups ranging from the mode of communication, language of communication, means of approaching a group to the time of day when they would be available or willing to engage.

Stakeholder Consultations

A detailed stakeholder mapping of the three categories of stakeholders- Affected, Interested and Disadvantaged/Vulnerable Groups was initially undertaken which guided the consultations held between December 2020 and November 2021. Given the physical distancing requirements due to the Pandemic, most of the consultations were held virtually. Meetings were held with the MoE-PD to discuss the project scope, environmental and social implications and risks, GRM procedures and institutional arrangements. The DISCOs engaged with stakeholders at different levels and held individual consultations, consultative workshops and also participated in a forum hosted by South Asia Gender and Energy Facility with Pakistan DISCOs. The objective of this discussion was to share how WePOWER can be effectively leveraged to achieve organizational diversity and human resource goals towards and promote gender equality in the Pakistani energy sector.

Individual Consultations: The participating DISCOs held individual sessions with institutional stakeholders and other interested entities, including the local CSOs active in their areas. A broad range of issues were discussed and the institutional consultations focused on balance of flora and fauna in the vicinity of grid stations, efficient energy use, adequate compensation be paid to affectees of electric works, promotion of clean and renewable energy projects etc. Similarly through interviews with local CSOs and NGOs, the DISCOs obtained constructive feedback pertaining to the construction of transmission lines, engagement with local communities through the project life, accessibility of a complaint mechanism, the importance of conducting social assessments to gauge project impact on people and livestock in rural areas. They also noted that DISCOs also need to consider health and safety concerns and put relevant mechanisms in place. The DISCOs also engaged with communities primarily associated with grid stations. Primary concerns voiced centered on extended power outages and the economic hardship it causes.

Gender: At present, WePOWER has 27 Partners of which five are from Pakistan. These are Karachi Electric Supply Company (*K-Electric*), *Water and Power Development Authority (WAPDA)*, *Women in Energy Pakistan (WiEP)*, *Women Engineers Pakistan (WEP)*, and *Pakhtunkhwa Energy Development Organization (PEDO)*. Partners in Pakistan have completed a total of 224 activities helping 5551 female beneficiaries from 2019-2020. Last year, in response to the COVID-19 pandemic, they hosted the largest virtual job fair ever in Pakistan, with 530 female students participating and networking through the event. The big success areas in Pakistan have been STEM outreach and job outreach activities. Other areas of focus have been activities on professional development, retention and policy and institutional change.

Consultative workshops: Each DISCO also held a workshop to seek feedback from a spectrum of stakeholders. The concerns and suggestions provided through this platform also focused on the management of environmental and social risks on vegetation/trees, impact on settlements, on cultural heritage and other aspects, incorporation of input from grassroots stakeholders and an effective and accessible GRM. Other concerns were raised on the impact of electromagnetic field and safety consideration for transmission lines. Questions were also raised on legal mechanisms for possible land acquisition and payment of compensation.

Objectives of the Stakeholder Engagement Plan

The stakeholder engagement program aims to: establish a systematic and inclusive approach to stakeholder engagement; build and maintain a constructive relationship with stakeholders; incorporate stakeholders' views and concerns into project design/implementation; mitigate negative social and environmental impacts of the project; and, enhance project acceptance and socio-environmental sustainability. Stakeholder engagement has been divided into two phases:

Phase I (Project Preparation): The purpose of stakeholder engagement during this phase has been to: ascertain institutional needs; apprise all stakeholders about planned activities/reforms; improve project design; create synergies; and, enhance the socio-environmental sustainability of the project activities envisaged under the different project components.

Phase II (Project Implementation): Extensive stakeholder engagement will be carried out during this phase with PAPs, disadvantaged/vulnerable groups and other interested parties. Section 4.3. provides an exhaustive list of topics for stakeholder engagement during this phase along with the corresponding tools and techniques for conducting them. These will be further refined during project implementation and the finalised engagement topics, methods and frequencies will be presented in the revised SEP within 90 days of project effectiveness.

The frequency of stakeholder engagement will vary across the Project activities (quarterly, bi-annual or annual), depending on the nature/pace of activity design/implementation, its social and environmental risk and impact and its relevance to the stakeholders. As consultations are held with stakeholders these timelines will be ascertained accordingly when the SEP is reviewed and updated following project effectiveness.

The project will review its stakeholder engagement against the SEP bi-annually, and this review will be a part of the progress report that will be shared with the client management and the World Bank.

Resources (estimated annual cost: USD\$100,000)

Based on prior experience in similar engagement and awareness campaigns undertaken by the GoP, the budget for the SEP is proposed to be approximately USD\$100,000 annually. The detailed costs will be calculated once the activity plans for the project components are developed.

Management Functions and Responsibilities

Each DISCO will be responsible for the overall management, supervision, and execution of the project through the Project Management Unit (PMU). The PMU has established four sections under Chief Engineer (Development): Planning, Scheduling & Coordination (PS&C); Procurement; Finance; and Environmental and Social (E&S). EDEIP will also be implemented by these PMUs. PMUs will be supported by the Project Implementation and Management Support Consultants (PIMSC) and other individual advisors and experts as may be required.

MoE-PD will be the implementing entity and principal accounting authority for Component 4 of EDEIP. It will oversee execution of planned activities and will collaborate with relevant entities as described in Figure 3 for their effective execution. On the policy aspect, Power Planning and Monitoring Company (PPMC) will support MoE-PD, whereas PPIB/AEDB will be responsible for carrying out the work related to the IAA. The setting up of the Independent System and Market Operator (ISMO) will involve NTDC and CPPA-G, who is currently serving the role of the market operator.

A Project Steering Committee (PSC) is proposed to provide a high-level oversight, strategic guidance and facilitate coordination between relevant entities and departments for smooth implementation of Component 4 of EDEIP in particular and overall project implementation in general. PSC would be chaired by Secretary Energy with Member Energy Planning Commission, CEOs of PITC, DISCOs and PPMC and representatives of NEPRA and Privatization Commission as its members. The PSC composition is fit for purpose and other members can be coopted on a need basis. The PD of PIU in MOE-PD will be Secretary to the PSC.

In the case of the DISCOs, the overall responsibility of E&S performance, including SEP implementation, will rest with the Project Director (Chief Engineer Development). Within the PMU, under the Chief Engineer, Development, IAs have already established their respective Environmental and Social Cells (ESC) to manage the E&S related activities. The ESC is headed by a Deputy Manager, and assisted by two Assistant Managers, Environment and Social Development, respectively with relevant qualifications and experience; the strength can be increased in the future as required. Under the proposed institutional arrangements, a gender specialist will also be required to be part of each ESC Team. The implementation and updating of the SEP through the life of the project will be the responsibility of the Assistant Manager- Social under the supervision of the Deputy Manager. In case there is 1 Assistant Manager in the PMU, that person will be responsible for implementing the SEP.

Grievance Redress Mechanism

EDEIP is proposing that a robust GRM be established to ensure that stakeholders across the board are able to avail to a simple, accessible and effective platform for having their complaints addressed and resolved.

Each DISCO will establish a GRM to address grievance and complaints related to EDEIP. The Project level Grievance Redress Mechanism (GRM) will be set up for all subprojects under EDEIP to address grievances arising from social, LAR and environmental impacts. In each IA, the GRM will be set up with a three-tiered structure; one at local, PMU and DISCO levels enabling immediate local responses to grievances and higher-level review addressing more difficult cases not resolved at the local level. To ensure that all geographic reaches and relevant administrative units involved in the project are covered, the GRM will set up (i) a local mechanism in each affected village/community with grievance redress focal points; (ii) a grievance redress committee (GRC) at PMU level, as applicable and useful and (iii) a tier at DISCO level.

A three-tier GRM will provide a time-bound, early, transparent and fair resolution for APs' and other stakeholders' grievances regarding E&S management of each subproject. All complaints received verbally or in writing will be properly documented and recorded in the Complaint Management Register(s). In addition, an easy-to-access web-based system will be developed to receive the complaints. If the complaint cannot be resolved at these three tiers, the complaint will have a choice to lodge his/her complaint at the related court of law. GRM will not, at any stage, bar access of APs to the court of law.

The MoE-PD has an online complaint system in place which will be used under EDEIP. The Pakistan Citizens Portal will also provide an alternate platform for filing grievances. MoE-PD will designate a focal point to support implementation of E&S aspects.

Grievance Records and Documentation Each IA will nominate a GRM Focal Point to manage a grievance database to keep a record of all grievances received. The database will contain the name of the individual or organization lodging a grievance; the date and nature of the grievance; any follow-up actions taken; the solutions and corrective actions implemented by HESCO or other relevant party; the final result; and how and when this decision was communicated to the complainant.

Monitoring and Review It is critical to monitor the effectiveness of the comment response and, grievance mechanism. Appropriate measures/KPIs for this include monthly reporting on the number of grievances received, resolved and outstanding. This will be undertaken by the GRM focal point.

Monitoring and Reporting

The SEP will be periodically revised and updated bi-annually during the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis. Based on the data collected regularly, these indicators are:
 - Number of consultation meetings (virtual) and other public discussions/forums conducted monthly, quarterly, and annually;
 - Frequency of public engagement activities;
 - Number of public grievances received (monthly, quarterly, and annually) and number of those resolved within the prescribed timeline.

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1. Introduction/Project Description

The Government of Pakistan (GoP) is completing its second year of foundational reforms, with support from the World Bank Group (WBG), to restore financial viability of the power sector and lock in the transition to a low carbon footprint (Program for Affordable and Clean Energy, PACE), improve fiscal management and competitiveness (Resilient Institutions for Sustainable Economy, RISE), and accelerate human capital accumulation (Securing Human Investment to Foster Transformation, SHIFT). The PACE DPF series builds on power sector reforms started under the first of three RISE DPF series (RISE-I). It supports the GoP to reduce circular debt (CD) by reducing power generation costs, decarbonizing the energy mix, improving efficiency in distribution, and retargeting electricity subsidies. RISE-II, the second in a series of three, supports measures to enhance the country's fiscal position and promote competitiveness and growth through harmonization of the general sales tax, increased use of digital financial services, and enhanced integrity in the financial sector. SHIFT-II, the second in a series of two, focuses on reforms to accelerate human capital accumulation, increase the contribution of women to economic activity, and improve federal safety nets to respond to shocks like COVID-19. The three operations are designed to be complementary to each other and to the GoP's overall reform program. Collectively, the PACE, RISE, and SHIFT reforms are expected to help Pakistan break out of boom-and-bust macroeconomic cycles and get on a sustainable growth path, which will in turn facilitate sustainable investment and generate welfare gains. The proposed project will complement the power sector reforms and help with their implementation.

Power sector reforms supported by PACE and complemented by the proposed Electricity Distribution Efficiency Improvement Project (EDEIP) are critical to resolving Pakistan's fiscal challenges. The power sector has long been a hindrance on the economy, providing insufficient services and building up large sector deficits. Poor planning, implementation bottlenecks, and limited access to financing have created long periods of load shedding³ for electricity consumers. Inadequate choice of power generation technology and inefficiencies in distribution have resulted in high costs of electricity, damaging Pakistan's competitiveness. Financial deficits with power sector state-owned enterprises (SOEs) have been building up as governments have not passed on the full cost of power to consumers. Sector deficits⁴ have averaged 2.2 percent of GDP during the last decade (FY11–20). The power sector deficit that is not covered by subsidies is accumulated as CD, adding to the government liabilities. The circular⁵ debt has risen rapidly over the last three years and has increasingly added to the fiscal vulnerability of the economy. The total accumulated debt stock by June 30, 2020, stood at US\$13.2 billion (equivalent to 5.3 percent of gross domestic product [GDP])⁶ consisting of: (i) US\$7.0 billion of arrears from distribution companies (DISCOs) to Central Power Purchasing Agency-Guarantee (CPPA-G), which has corresponding payables to power generation companies; and (ii) US\$6.2 billion debt stock held in the Power Holding Pakistan Limited (PHPL). The PHPL is used for raising local bank loans and Islamic Sukuks to cover parts of the sector deficit.

Decarbonizing the energy mix by reducing dependence on imported fossil fuels is essential to lower the average power generation cost and to meet the Nationally Determined Contributions target. Currently about two-thirds of power generation in Pakistan is from imported oil, gas, and coal, which creates exposure to foreign exchange vulnerability. High cost of electricity supply has exacerbated

³ Forced blackouts due to power supply deficits.

⁴ Defined as difference between the cost of delivering electricity and the revenues generated from its distribution.

⁵ The reference to circularity is because the arrears cascade from the DISCOs, single-buyer, and power producers to fuel suppliers.

⁶ PKR 2,154 billion as of June 30, 2020; currency exchange PKR:US\$1=162.5 Rs; GDP 40,958 billion for FY20.

cost recovery challenges for the distribution companies and is a major cause of CD. The GoP has taken key steps to decarbonize the generation mix; the RE Policy notified in FY20, stipulates increased solar and wind power share in the energy mix. This will bring the share of RE (solar, wind, hydro, and bagasse) to 63 percent by 2030, reversing the large dependence on imported fossil fuel. Also, an important part of the RE Policy and the new National Electricity Policy is the introduction of competitive bidding for all new generation projects, which will disrupt the three-decades old practice of direct contracting and cost-plus tariffs that led to high power costs.

Long-term financial viability of the power sector is dependent on DISCOs efficiency improvement. {to be updated with FY20 or FY21 figures} Losses accruing in DISCOs have a cascading effect throughout the energy value chain. In FY19 about PKR 116 billion remained uncollected and total receivables reached PKR 1,050 billion (translates into a turnover rate of 350 days) of which PKR 800 billion were private receivables. Consequently, DISCOs total payables to CPPA-G were PKR 971 billion. Moreover, DISCOs also incurred a financial loss of PKR 37 billion in FY19 on account technical and non-technical/pilferage losses exceeding the NEPRA targets. However, as showed in Annex 1, some of the DISCOs have performed better than others. Non-existent incentive structures and lack of transparency in data collection and reporting are major barriers to improving governance and performance of the DISCOs. Therefore, to make power sector financially viable the DISCOs would need to become more efficient by investing in new technologies which would help improve their operational performance and financial profitability.

Pakistan's energy reforms were initiated in the 1990s but remain unfinished. The first stages of reform aimed to attract private investment into power generation to address growing supply deficits⁷. In 1997, the GoP unbundled the Power Wing of the Water and Power Development Authority (WAPDA)⁸ into four thermal generation companies (GENCOs), one National Transmission & Despatch Company (NTDC), and ten electricity distribution companies (DISCOs), for subsequent privatization of the unbundled GENCOs and DISCOs. Hydropower assets remained with WAPDA. The National Electric Power Regulatory Authority (NEPRA) was also set up in 1997 with the responsibility for licensing, determining tariffs, creating standards, and monitoring sector performance. Electricity distribution licenses were issued to the DISCOs by NEPRA in 2002 for a 20-year period and first DISCO-wise tariffs were notified in 2007. In 2015, the single buyer function was separated from NTDC and is now the responsibility of the CPPA-G. CPPA-G's core functions include billing and settlement, power procurement on behalf of DISCOs, and market development. The institutional architecture for a modern power sector is in place, but challenges remain that prevent Pakistan from benefitting from these institutional reforms.

The power supply deficit started in 2006⁹ and in 2015 these power outages caused an estimated economic loss of US\$18 billion or 6.5 percent of the GDP.¹⁰ The problem of supply deficit was largely addressed by 2018 through rapid development of thermal power plants and FY20 was the first year

⁷ Hubco was the first Independent Power Producer (IPP) that was commission in 1997 and presently about 60 percent of installed capacity is owned by the private sector.

⁸ Historically, there were two vertically integrated electric utilities operating in Pakistan that were responsible for generation, transmission and distribution in their exclusive territories – Karachi Electric Supply Company (KESC, now referred to as K-Electric or KE) served city of Karachi and its surrounding areas and Water & Power Development Authority (WAPDA) for the rest of Pakistan.

⁹ Load-shedding in the early 2010s was as high as 8–10 hours per day during the high demand summer season.

¹⁰ Zhang, Fan. 2019. *In the Dark: How Much Do Power Sector Distortions Cost South Asia?* South Asia Development Forum. Washington, DC: World Bank. <https://www.doi.org/10.1596/978-1-4648-1154-8>.

without a power supply deficit¹¹ and the on-going construction of several power generation projects will ensure sufficient supply over the next three to four years. Financial deficit, on the other hand, started to grow at an accelerated rate. While the electricity supply was increasing, performance of the DISCOs to reduce T&D losses and improve collection improved marginally. As a result, number of units lost increased further. Moreover, the average cost of generation was also going up and therefore each lost unit was of higher value. The increase in supply at a higher per unit cost had a multiplier effect. The two main reasons for increase in per unit cost of generation between 2018 and 2020 are: (i) demand didn't grow as anticipated and capacity at a fixed cost remained underutilized; and (ii) rupee depreciated resulting in higher fuel cost as well as US dollar indexed returns allowed in the Power Purchase Agreements (PPAs). The deficit also grew because the high cost of generation was neither fully passed on to the consumers nor the subsidies were adequately budgeted and paid. As a result, these deficits added to the circular debt and were further compounded by the late payment penalties to generators and interest on debt raised to finance these deficits.

The causes and solutions to CD are known but solutions are difficult to implement.¹² Someone must pay to reach cost recovery in order to close the financial deficit: either consumers via increased tariffs, or power producers through lower profits, or the public through increased taxes and/or higher national debt. Lowering generation costs through introduction of cheaper RE and reducing technical and commercial losses in distribution will ease pressure on these stakeholders, but this will take time because of the long lead times for investments in the sector. Quick solutions are difficult as different stakeholders have diverging interests. Distortion of consumer tariffs through subsidies has created benefits for certain consumer groups that are unlikely to easily let go of these. Power producers, many of them funded through foreign investments and borrowing, benefit from lucrative long-term PPAs.

Pakistan has so far failed to stem CD since it has focused on one problem at a time. This has partly been due to elite capture and vested interests that have skewed the burden-sharing. The 2013–18 government had a program to reduce CD, such as loss reduction measures in distribution as well as the privatization of DISCOs. However, pressure to implement difficult structural reforms eased because of windfall gains from a stable Rupee and decreasing oil prices in 2015–16. Importantly, the focus on rapidly increasing generation to solve load-shedding led to increased fixed costs of power generation when the committed new coal and LNG plants started to come online in 2018. As a result, CD accelerated again.

The COVID-19 pandemic has further accentuated the problem. The external shock affected CD in several ways: (i) the GoP interrupted its plans of increasing consumer tariffs and decided to freeze tariffs while generation costs continued to rise; (ii) consumer willingness to pay decreased and thus collection of bills declined; (iii) anti-theft programs were interrupted due to restrictions to field work and distribution losses increased; and (iv) liquidity needs to finance COVID-19 measures reduced the fiscal space to provide subsidies to compensate lower tariff revenues and to reduce CD stock. As a result, there was a record accumulation of CD (US\$3.4 billion) in FY20.

The GoP has now taken a more holistic and comprehensive approach to reducing CD, which has replaced load-shedding as the priority challenge in the energy sector. The record CD flow in FY20 showed that the focus on short-term measures, such as tariff increases, were not sufficient. Exogenous

¹¹ Power cuts still occur due to poor performing distribution networks or due to forced load-shedding to curb non-payments of bills; however, the volume of load-shedding is significantly reduced compared to previous years.

¹² Key contributing factors to the CD flow are high and increasing power generation cost, unbudgeted and untargeted subsidies, inadequate tariff, high distribution losses and low collections of electricity bills, and high cost of debt and accumulation of arrears.

factors like the rise in cost of imported fuel or the COVID-19 shock, which lessen or reverse short-term quick fixes, showed that addressing the underlying structural issues of the sector (high power costs, DISCO inefficiency, untargeted subsidies, and lack of competition) is inevitable to solve the CD issue in a sustainable way. Also, the problem cannot be solved without all stakeholders (producers, suppliers, consumers, government) collectively and equitably sharing the burden of reforms. The GoP has recognized this and initiated a comprehensive power sector reform package, which is supported by PACE. For the first time, the reform program covers all aspects of the sector, focusing strongly on reducing current and future power costs now, reducing reliance on imported fossil fuel, adding Renewable Energy (RE), addressing inefficiencies in distribution, increasing private participation, and lowering subsidies in the sector by better targeting them to those most in need.

The efficiency of the DISCOs also needs to improve to increase access and ensure reliable and affordable supply of electricity to the end consumers. Pakistan's rank for Getting Electricity indicator in Ease of Doing Business has improved from 167 in 2019 to 123 out of 190 economies in 2020 and processes to be further streamlined. However, a significant number of households do not have access to electricity and per capita electricity consumption at 471 kWh is less than one-fifth of the world average according to the World Development Indicators 2017. The GoP is committed to improving the performance of distribution companies. It is a key element of the overall effort of reforming Pakistan's power sector and strengthening its operating performance. Major emphasis in the Circular Debt Management Plan (CDMP) is on curtailing losses of the DISCOs through administrative and technical measures. The government has also increased autonomy of the DISCOs by transferring human resources powers to the respective DISCOs and designating independent Directors of the Board. With Boards in place and authority established, the MoE-PD is in the process of signing Performance Contracts with the DISCOs to improve their efficiency regarding technical and commercial losses in line with goals set in the CDMP. The proposed project will support investments in the selected DISCOs to strengthen and modernize their electricity distribution networks and operations, resulting in improved efficiency and reliable supply to the consumers. This will include energy loss reduction measures, revenue protection programs, and institutional and governance strengthening of DISCOs. EDEIP will also build institutional capacity of the MoE-PD to implement power sector reforms.

Private participation in DISCOs needs to be introduced in an orderly and transparent manner. KE was privatized in 2005 as a vertically integrated utility but privatization of the unbundled GENCOs and DISCOs couldn't proceed as envisaged under power sector restructuring plan to unbundle WAPDA. This is because of several reasons including weak political commitment and lack of consensus, mixed experience with KE privatization, unaddressed apprehensions of DISCO employees and weak institutional capacity. Pakistan Electric Power Company (PEPCO) which was created in 1998 to steer the privatization program of the unbundled DISCOs and GENCOs failed to do so and practically held complete control over the DISCOs rendering Boards and management of the DISCOs largely ineffective. Pakistan tried to fully privatize the DISCOs in 2015 starting with Faisalabad Electric Supply Company (FESCO)¹³ but could not proceed due to stakeholders' concerns and opposition from workers' unions. The current government has again expressed the intention to bring in private participation in the distribution sector to mitigate poor performing SOEs and reduce government liabilities. As part of the power sector reforms supported through PACE DPC, Cabinet Committee on Privatization has approved steps for increasing private participation in the management of the government-owned DISCOs. For this to be successful, lessons learned from KE and previous attempts have been considered, and assessments of the potential mode of private sector participation have

¹³ The FESCO transaction, which was ahead of the other transactions, reached past the road show stage and interested private parties deposited their initial expressions of interest in the FESCO privatization.

been conducted. The results of this work suggest actions to bring in private participation in the management of DISCOs, either through management contracts or concessions, while the company and assets remain in ownership of the GoP. Four out of ten DISCOs are expected to have private participation by end of 2023.

The development of the wholesale competitive electricity market and transitioning away from a single-buyer model is equally important. Following NEPRA's 2018 amendment, CPPA-G developed a wholesale electricity market conceptual design, which has been approved by NEPRA, together with a detailed implementation plan. The target date for the commencement of the commercial operation of the wholesale market is April 2022. One of the actions in the market design implementation plan is the update of the Pakistan Grid Code (also one of the triggers for PACE II), allowing the integration of variable solar and wind power and introducing modern best practices in economic dispatch. Furthermore, CPPA-G will be responsible for amending the Commercial Code, which will set the objectives, principles, rules, procedures, rights, and obligations that govern trading in the wholesale market. For effective functioning of the wholesale markets DISCOs will set up Market Implementation and Regulatory Affairs Department (MIRAD) which will be responsible for overall implementation of DISCOs actions under CTBCM including ensure compliance of the regulatory directions for power market, oversee the transmission planning and forecasting activities within DISCOs, facilitate tariff petitions for supply and network businesses, management of credit cover/guarantees, , lead the contract negotiations with generators and administration of bilateral contracts and participation in all regulatory hearings, workshops and meetings to represent views of the respective DISCOs with regards to the implementation and operations of the competitive electricity market.

The EDEIP is aligned with the World Bank Group's [under preparation] Country Partnership Framework (CPF) for Pakistan 2022-2026. It will directly contribute to focus area on Growth by improving supply of electricity to businesses, industry and agriculture consumers. It also has significant contributions towards achieving the goals for the focus area Green and Clean Pakistan – reduction in T&D losses and theft control measures will require lesser generation to meet the demand and most of this reduction will be from the inefficient expensive fossil fuel thermal power generating units.

Furthermore, as Pakistan moves towards achieving the RE targets set out in the RE Policy the EDEIP will help strengthen the transmission and distribution network of the DISCOs to supply this power to the end-consumers. The rollout of CTBCM supported under the Project is also expected to have a positive impact on investments in low-cost solar and wind energy projects. The project will also contribute to the CPS focus area for health and education. Several studies have shown that access to electricity improves economic development and the expansion & augmentation of the grid to some of the underserved areas of the selected DISCOs will help overcome disparities in health and education.

The EDEIP is consistent with the Government of Pakistan's National Electricity Policy (NEP) 2021. NEP lists three key objectives – access to affordable electricity, energy security and sustainability. The Project will help achieve these objectives following key principles also laid down in the NEP – improve efficiency of the distribution companies through improved governance, increase transparency and availability of reliable data through automation and digitization of processes, build competition through development of the whole sale market, and improving performance of the DISCOs to ensure financial viability of the power sector.

The interventions under the project specifically aim at improving governance, technical capabilities, safety, and commercial performance of the DISCOs. It will also build the capacity of the sector institutions to implement power sector reforms and support enhancing private participation in the

management of the DISCOs.

Project Development Objectives and Components

The project development objectives are to improve operational efficiency in targeted areas of selected distribution companies and support Ministry of Energy to implement reforms.

The proposed Project will support the Ministry of Energy Power Division (MoE-PD) and the targeted DISCOs (herein after called Implementing Agencies (IAs) in strengthening and modernizing their electricity distribution network and operations, which should result in improved efficiency and reliable supply to the consumers. Three DISCOs namely Hyderabad Electricity Supply Company (HESCO), Multan Electric Power Company (MEPCO), and Peshawar Electric Supply Company (PESCO) have been selected. The Project will help these DISCOs to modernize and improve their service delivery. This will be achieved through strengthening of the grid to improve quality of supply of electricity to the consumers while reducing technical losses under Component 1 of EDEIP and modernizing operations and management of the DISCOs through effective use of technology and information systems to improve commercial performance and service delivery under Component 2 of EDEIP. Component 3 of EDEIP will help build capacity of the DISCOs to better perform various functions and to support project implementation. In addition, Component 4 will support MOE-PD and GoP to implement power sector reforms and improve sector governance. The project components are described as follows:

Component 1 - Improving Grid Reliability

This component will finance investments in Secondary Transmission and Grid (STG) and Energy Loss Reduction (ELR) programs of the DISCOs to improve reliability of electricity supply and reduce technical losses. The subprojects financed under this Component can be divided into following categories:

- a. New Grid Stations. Construction of new 132 kV grid stations and the associated transmission lines;
- b. Existing Grid Stations. Augmentation, extension, conversion, upgradation and rehabilitation of the existing grid stations and the associated transmission lines;
- c. Transmission Lines. Construction, rehabilitation and re-conductoring of 132kV (and below) transmission lines with low loss conductors e.g. high-tension low sag (HTLS); and
- d. Energy Loss Reduction. Expansion and rehabilitation of 33kV and 11kV feeders.

Component 2: Modernizing Operations and Management

This component will support modernization of the DISCOs' operations and management functions using latest equipment, technology and information systems. Major activities include:

- a. Automation and Information Systems. This entails upgradation deployment of information systems and ERP solutions. This will help improve planning, grid operations and customer services by providing access to and integrating modern information systems e.g. Incident Management System (IMS), feeder automation, transformer monitoring and protection systems, Geographic Information System (GIS), Customer Management System (CMS) and Enterprise Resource Planning (ERP). This will lead to deployment of SCADA¹⁴ and Distribution Management Systems (DMS) during project implementation (subject to finalization of feasibility and required approvals) to integrate these information systems and to start the implementation of smart grids.

¹⁴ SCADA is a backbone of Smart Grids and a standard for modern utilities and is required by the Regulator and the Grid Code.

- b. Revenue Protection Program. It will comprise of installation of Aerial Bundled Cables (ABC), Advanced Metering Infrastructure (AMI), Transformer monitoring System, and other measures to pre-empt theft, reduce losses, improve recoveries, and better service delivery based on access to reliable and timely data.

Component 3: Capacity Building & Technical Assistance

This component will help build capacity of the DISCOs with particular focus on:

- a. Improving Operations and Maintenance. This will cover procurement of tools, equipment, hardware, software, consulting and non-consulting services for improved operations and maintenance practices e.g. for live-line maintenance, upgrade repair workshops, inventory/asset management etc.;
- b. Training, Capacity Building and Improving Gender Diversity. Conduct studies and assessments including preparation/updation of manuals, procedures and systems in particular for HR management, inventory management, procurement, financial management, customer services and E&S management and assist with their implementation; conduct training programs including workshops, seminars and post graduate degrees in relevant fields; and implement activities to promote workforce participation of women.
- c. Project Implementation Support. This includes financing of: (a) consulting and other services; (b) individual experts/advisors and any incremental staff positions; (c) equipment and software; (d) financial, operational & technical audits; and (e) operating cost of Project Management Units (PMUs). Key activity will be hiring of Project Implementation & Management Support Consultants (PIMS) covering implementation of all project related activities including: procurement, contract administration, quality control, financial management, preparation/updation of feasibilities, designs and bidding documents as well as support in implementation of E&S management instruments.

Component 4: Reform Support

The purpose of Component 4 is to help MoE-PD fulfill its mandate under the National Electricity Policy 2021 and strengthen its oversight function. This component consists of two main subcomponents that will support MoE - PD in the implementation of power sector reforms and improve sector governance. The key areas of support under this Component are described below:

- a. Supporting Governance and Institutional Reforms: The PD is in the process of consolidating all policy related activities that are currently being conducted by different parts of the sector entities, into one centralized location that will be dedicated to supporting PD in development of policies, strategic plans, frameworks, monitoring, and other activities. Towards this end, PD will collaborate with Power Planning and Monitoring Company (PPMC), a newly established entity as a result of PEPCO restructuring. PPMC's role will not involve any management of the DISCOs operation but will be focused primarily on the monitoring of the DISCOs performance, providing policy direction, conduct research and development, carry out strategic studies, sector assessments, analysis, audits, feasibilities for new technologies, etc., all with the aim of improving DISCOs processes and efficiency. With the reconstitution of new boards of DISCOs (part of PACE-I), they have been given more autonomy, at both, board, and management level, including HR functions. The GoP's (through PD) role is now to monitor their performance to improve their efficiency regarding technical and commercial losses in line with goals set in the CDMP. One of the first policy activity to be supported through this subcomponent is the development of the National Electricity Plan

(one of the PACE-II Prior Actions). This subcomponent will also finance procurement of software, including trainings, hardware, consulting services (individual experts/advisors as well as firms), research and development program (that would establish PPMC as a center of excellence), required to perform the core policy and strategic functions.

- b. Supporting the implementation of Competitive: The MoE-PD is also in the process of the implementation of electricity market reforms to transition from existing single-buyer market to a competitive wholesale market. The initial market design was approved by NEPRA in December 2020, and it is expected to commence operation in April 2022. The progress towards commencement is monitored through a Market Implementation & Monitoring Group, led by secretary PD and Chairman NEPRA. There are a number of activities already ongoing to accommodate this transition, including new Grid Code and new Commercial Code (both part of PACE-II prior actions). Furthermore, there are some key institutions that are in the process of being established and that will be supported through this subcomponent, such as Independent System Operator (ISO), Market Operator (MO), and Independent Auction Administrator (IAA). Towards this end, the PD will collaborate with Alternative Energy Development Board (AEDB)/Private Power Infrastructure Board (PPIB), CPPA, and NTDC to implement this subcomponent. The support through this subcomponent will further finance procurement of tools, equipment, software, training and consultancies required for effective start-up of these three entities. The IAA will be a new entity responsible for running the competitive auctions for new capacity procurement / new contracts of DISCOs. It will be established as part (AEDB)/ (PPIB) restructuring. The establishment of the ISO and MO will involve organizational restructuring of NTDC and CPPA, whereby Market Operator (MO) function of CPPA-G and System Operator (SO) function of NTDC will be restructured into separate legal entities.

This SEP covers the 4 implementing agencies, **the Ministry of Energy, Power Division; and three DISCOs namely Hyderabad Electric Supply Company HESCO Peshawar Electric Supply Company (PESCO) and Multan Electric Supply Company (MEPCO).**

Ministry of Energy

The Ministry of Energy, Power division is the Pakistan Government's created on 4 August 2017 after merging of the Ministry of Petroleum and Natural Resources with the power division of the Ministry of Water and Power (now renamed Ministry of Water Resources), respectively. The ministry has two divisions - petroleum and power.

HESCO

Hyderabad Electric Supply Company (HESCO) operates in thirteen districts of Sindh Province. These districts included Badin, Thatta, Sujawal, Tando Allah Yar, Tando Muhammad Khan, Sanghar, Matiari, Shaheed Benazir Abad (old Nawab shah), Jamshoro, Mirpurkhas, Umerkot, Tharparker, and Hyderabad. HESCO has administratively divided 13 districts of Sindh Province into 4 operation Circles, 15 operation Divisions and 67 operation Sub-divisions along with 6 construction divisions, and 5 maintenance divisions. Sindh is the third largest province of Pakistan by area and second largest province by population after Punjab Sindh lies in the southeast of the country and is bordered by Baluchistan province to the west, and Punjab province to the north. Sindh's population is 47.9 million with HDI at 0.533 and GDP of US\$83 billion. Sindh has Pakistan's second largest economy because of the Karachi. Barring Karachi, Sindh mainly has an agriculture-based economy. Sindh is known for its distinct culture which is strongly influenced by Sufism.

Project Components:

- Construction of two new grid stations
- Conversion of a grid station
- Extension of a grid station
- Augmentation of a grid station
- Re-conductoring of a transmission line with a total length of 28 kilometers (km)
- Complete facility for AMI System for 30,000 AMR meters
- Installation of SCADA.

MEPCO

Multan Electric Supply Company (MEPCO) is the largest power distribution company in the country operating exclusively in 13 administrative districts of Southern Punjab.

MEPCO covers 13 administrative districts of southern Punjab, i.e., Multan, Muzaffargarh, Layyah, D.G.Khan, Rajanpur, Lodhran, Bahawalpur, R.Y.Khan, Khanewal, Sahiwal, Pakpattan, Vehari and Bahawalnagar. Punjab has a population of about 110 million as of 2017. Punjab had a GDP of US\$173 billion in 2017 and it has the highest Human Development Index (HDI) out of all of Pakistan's provinces at 0.567. However, a clear divide is present between the northern and southern portions of the province with some in south Punjab amongst the most impoverished.

Project Components:

- Construction of six new grid stations
- Installation/improvement of 70 HT feeders
- Installation of transformer monitoring system
- Installation of 126,632 smart meters

PESCO

Peshawar Electric Supply Company (PESCO) is responsible for distribution of electricity in twenty-eight districts of Khyber Pakhtunkhwa (KP). These districts included Peshawar, Upper Chitral, Lower Chitral, Swat, Upper Kohistan, Lower Kohistan, Kolai Palas, Shangla, Battagram, Mansehra, Torghar, Upper Dir, Lower Dir, Malakand, Buner, Mardan, Charsadda, Swabi, Abbottabad, Haripur, Nowshera, Kohat, Hangu, Karak, Bannu, Laki Marwat, Tank and Dera Ismail Khan. PESCO is divided into eight circles¹⁵ covering about 1,204,621 ha of land in total KP is located in the northwestern region of the country. It is home to 17.9 percent of Pakistan's total population.

Project Components:

- 11-kilovolt (kV) capacitor banks
- Upgrading 132-kV bus bars at 20 grid stations
- Extension of four grid stations

¹⁵ http://www.pesco.gov.pk/what_we_do.asp

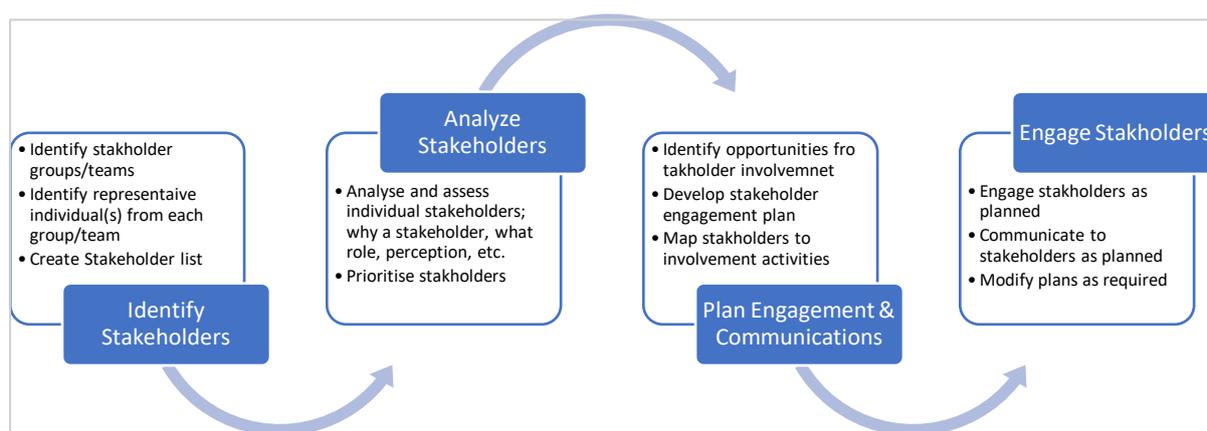
- Augmentation of 12 grid stations
- Re-conductoring of four transmission lines with a total length of 49 kilometers (km)
- Installation/improvement of 130 high tension (HT) feeders
- Installation/improvement of low tension (LT) feeders
- Installation of transformer monitoring system
- Installation of 65,000 smart meters
- Aerial bundle cable (ABC) for 74 feeders (4,000 km).

Objectives of SEP

Under World Bank-financed projects, a **Stakeholder Engagement Plan (SEP)**, and **project level Grievance Redress Mechanism (GRM)** need to be developed in accordance with **ESS10 (Stakeholder Engagement and Information Disclosure)** of the **World Bank’s Environmental and Social Framework (ESF)** and any corresponding national legislation. ESS10 requires that Borrowers engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement have to be proportionate to the nature and scale of the project and its potential risks and impacts.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. **The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project.** The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities

Figure 1: Process Of Stakeholder Engagement



2. Brief Summary of Previous Stakeholder Engagement Activities

Electricity Distribution and Transmission Improvement Project (EDTIP), a World Bank funded project sought to strengthen the capacity of the distribution and transmission networks to meet increasing

electricity demand in the selected areas more efficiently and with better reliability and quality. It also worked to strengthen institutional capacity of the selected distribution companies and support other priority areas of the power sector reform.

EDTIP was implemented by 5 Distribution Companies from June 2008 to February 2014. These were the Lahore Electric Supply Company (LESCO), MEPCO, HESCO, Islamabad Electric Supply Company (IESCO) and National Transmission and Dispatch Company (NTDC). A number of stakeholder consultations were conducted in preparing E&S management documents for this project. Two of the same distribution companies, namely HESCO and MEPCO will be engaged in implementing EDEIP. Some of the concerns and recommendations made by various stakeholders during consultations¹⁶ held by HESCO and MEPCO are summarized below.

Institutional Stakeholders:	Land acquisition issues
	Possibility of soil and water contamination caused by the PCB-containing transformer oil
	Construction-related issues, such as waste disposal, soil erosion and hazard for communities
	Effects of electromagnetic radiation caused by the high power transmission lines
	HESCO and MEPCO should conduct environmental and social assessment of all of its projects
	HESCO and MEPCO should develop organizational capacity or managing the environmental as well as social issues during its operations.
	HESCO should ensure community participation during all phases of the project
	The PCB elimination program should be developed and implemented
Community Consultations	Safety hazards caused by the transmission lines
	Possibility of transmission line passing over the settlements and through the cultivation fields
	Low height of the transmission line thus causing safety hazard, and not allowing the residents to construct taller buildings/install antennas etc.
	Electromagnetic radiation caused by the transmission line
	Obstruction in the flight path of the aircraft
	HESCO and MEPCO should take all safety precautions to. minimize safety hazards associated with the transmission lines
	The transmission line should avoid passing over the settlements or through the cultivation fields
	The transmission line construction should minimize crop damage
	Inadequacy of the existing power supply in the area
	Frequent load shedding and power outages causing hardship and economic loss;
	Compensation should be paid to the affectees for any crop damage or land acquisition during the Project
	The tower design should allow cultivation underneath them
	HESCO should take precautionary measures to minimize the risk of electrocution

¹⁶ MEPCO 6th STG and ELR Project (2006-07) Environmental and Social Assessment. Volume 1 of 2 - Main Report September 2006, HESCO 6th STG Project Environmental and Social Assessment Volume 1 - of 2- Main Report July 2007

	MEPCO should contact the Civil Aviation Authority and follow its procedures in connection with the establishment of the Grid station
	HESCO should provide employment opportunities to the local population near the project sites
	HESCO should provide electricity to the communities near the project sites currently not covered by the electricity network

3. Stakeholder Identification and Analysis

For meaningful and substantive engagement, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, as well as their priorities and objectives in relation to the Project. This information will then be used to tailor engagement to each type of stakeholder. As part of this process it is particularly important to understand how each stakeholder may be affected – or perceives they may be affected – so that engagement can be modified accordingly.

Under World Bank-financed projects, a **Stakeholder Engagement Plan (SEP)**, and **project level Grievance Redress Mechanism (GRM) need to be developed in accordance with ESS10 (Stakeholder Engagement and Information Disclosure) of the World Bank’s Environmental and Social Framework (ESF) and any corresponding national legislation.** ESS10 requires that Borrowers engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement have to be proportionate to the nature and scale of the project and its potential risks and impacts.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints if there are any about the project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities

Project stakeholders are defined as individuals, groups or other entities who:

- i. are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and
- ii. may have an interest in the Project (‘interested parties’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups’ interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liason link between the Project and targeted communities and their established networks. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with

the community stakeholders. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way.

Methodology

The project intends to utilize various methods of engagement that will be used as part of its continuous interaction with project stakeholders. For the engagement process to be effective and meaningful, a range of various techniques need to be applied that are specifically tailored to the identified stakeholder groups. In accordance with best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- **Informed participation and feedback:** information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- **Inclusiveness and sensitivity:** stakeholder identification is undertaken to support better communication and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, internally displaced persons (IDPs) if there are any in KP, drug addicts, persons with disabilities, youth, elderly and the cultural sensitivities of diverse ethnic and religious minority groups and those living in remote or inaccessible areas.

The three categories of stakeholders as per the ESS10 are outlined below:

- Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI)¹⁷ that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status¹⁸ and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

¹⁷ This refers to the overall project area under the jurisdiction of each DISCO as well as subproject locations which may have direct or indirect impacts due to project activities in these locations.

¹⁸ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

3.1. Affected Parties

ESS10 refers to Identifying individuals, groups, and other parties that may be directly or indirectly affected by the project, positively or negatively. Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project. The SEP focuses particularly on those directly affected, positively or adversely by the project activities. At this time, the client has identified directly affected parties under this category as:

- a. MoE-PD
- b. HESCO
- c. MEPCO
- d. PESCO
- d. Individual Customers/ Electricity users in project area- any organization representing customers
- e. People affected by land acquisition if any or by other environmental and social impacts such as land being acquired under transmission towers where there may be communities, communities in and around grid stations which are being augmented or rehabilitated, and exposed to hazardous materials, air and noise pollution
- f. Private entities affected by the project

3.2. Other Interested Parties

There may be broader stakeholders who may be interested in the project because it indirectly affects their work or has some bearing on it. As elucidated in the ESS10, while these groups may not be directly affected by the project, they may have a role in the project preparation or have a broader concern including for, but not limited to, information dissemination, awareness raising, community mobilization, and feedback. Interested parties under this category may be identified as:

- a. Environmental Protection agency- provincial and district
- b. Department of Agriculture
- c. Department of Revenue
- d. Department of Irrigation
- e. Department for Social Welfare
- f. Department for Women Development
- g. Forest Department
- h. Wildlife Department
- i. Archeological Department
- j. Department for Labor
- k. Local CSOs and NGOs working in the area
- l. Supervision consultants
- m. Contractors
- n. Workers organizations
- o. Workers Unions
- p. Service providers
- q. Suppliers
- r. Press and Media
- s. Academia
- t. Provincial NGOs with community outreach
- u. Community based organizations
- v. Employees Old-Age Benefits Institution (EOBI)

The SEP process will include conducting consultations with representatives of each of these groups and defining a strategy for continual engagement with each of them throughout the project life.

3.3. Disadvantaged / Vulnerable Individuals or Groups

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impact of a project. It would also be critical to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups be adapted to take into account particular sensitivities, concerns and cultural sensitivities of such individuals or groups and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, literacy levels, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. religious and ethnic minorities or fringe groups), dependence on other individuals or natural resources, especially those living in remote, insecure or inaccessible areas, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

In this project, the vulnerable or disadvantaged groups may include, but are not limited to the following:

- a. Women Employees of HESCO, MEPCO, and PESCO
- b. Women in the energy sector in Pakistan
- c. Internally displaced people in KP if there are any
- d. Elderly employees
- e. Elderly citizens
- f. Disabled employees
- g. Disabled citizens
- h. Minorities (ethnic, religious, women)
- i. Low income households
- j. Transgender people

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. A description of the methods of engagement that will be undertaken by the project is provided in the following sections.

3.4. Summary of Project Stakeholder Needs

Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care,
Low income Communities	Low income, below or close to poverty line.	<ul style="list-style-type: none"> •Punjabi, Seraiki in the case of MEPCO areas •Sindhi in the case of HESCO areas •Pushto in the case of PESCO 	<ul style="list-style-type: none"> •Radio, TV, media and text messages •In person through social organizers or NGOs 	<ul style="list-style-type: none"> •Available at specific times of day, probably in evening. •May only be willing to talk to NGO workers and community organizers who have been in
Middle income communities	Range of livelihoods	As above, but probably comfortable with Urdu also	Phone, TV, social media, community leaders may be available on email or by telephone	<ul style="list-style-type: none"> •Available at specific times of day, probably in evening
Policy makers and influencers	High level stakeholders exercising influence in media and society	English mostly or Urdu	Direct invitation and engagement with MoE- PD officials	<ul style="list-style-type: none"> •Availability may vary and engagement would need to be planned in advance to ensure their involvement
Academics	Often employed in research organizations	English or Urdu	Email and phone	<ul style="list-style-type: none"> •Meetings during working hours preferably
NGOs and CSOs	Often exercise influence in local communities and can be. Important in social mobilization and awareness raising	<ul style="list-style-type: none"> •English and Urdu with larger NGOs at the provincial level •Local languages and Urdu at district level when engaging with CSOs 	<ul style="list-style-type: none"> •Email and phone •In person meetings 	<ul style="list-style-type: none"> •Meetings during working hours preferably

Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care,
Women	May not have much freedom of association or movement	<ul style="list-style-type: none"> •Punjabi, Seraiki in the case of MEPCO areas •Sindhi in the case of HESCO areas •Pushto in the case of PESCO areas •Urdu in urban areas 	<ul style="list-style-type: none"> •Phone, social media or radio •Community meetings organized by local CSOs working in rural areas 	<ul style="list-style-type: none"> •Accessible mainly to other women. •Times of availability will vary for different groups •Younger married women may need child-care
Vulnerable groups such as differently abled citizens, minorities, elderly people and transgender people	Often excluded from voicing concerns and/or marginalized in society	<ul style="list-style-type: none"> •Punjabi, Seraiki in the case of MEPCO areas •Sindhi in the case of HESCO areas •Pushto in the case of PESCO areas •Urdu in urban areas 	<ul style="list-style-type: none"> •In person through social organizers or NGOs 	<ul style="list-style-type: none"> •Times of availability will vary for different groups •Accessibility for differently abled citizens will be considered

A detailed stakeholder mapping of the three categories of stakeholders- Affected, Interested and Disadvantaged/Vulnerable Groups was initially undertaken which guided the consultations. However, given the emergency context in 2020 and the initial part of 2021, physical distancing requirements were in place. Appropriate adjustments were made to the mode used for conducting consultations to take into account the country lock down restrictions and the need for social distancing. Virtual consultations were held using WebEx, Zoom, Microsoft Teams, telephone calls, SMS and emails. The project consultations, meetings and workshops carried out to date are outlined below and detailed notes are included as annexes.

i. Individual Stakeholder Consultations

The first set of stakeholder consultations was held with the implementing agencies and other institutional stakeholders, following which interested parties were further identified in collaboration with the Ministry of Energy and all 3 DISCOs. In particular, organizations representing the people of the project areas as well as local CSOs and NGOs, were also approached along with communities near the impending grid stations to learn about their concerns and the means of engaging with them through the course of the project. Following the easing of COVID1-19 restrictions, face to face meetings and community consultations were also held by the various DISCOs.

The Bank team held several discussions and meetings with the MoE-PD over the past few months to design Component 4 and support PD to implement power sector reforms that started under PACE1. Meetings were held with Secretary Power and other officials including Additional Secretary and Joint Secretary of the MoE-PD as well as officials of relevant entities including CPPA-G, PPIB and PPMC. On November 2, 2021 a meeting was held with a Joint Secretary in the Ministry of Energy to discuss the project scope, environmental and social risks, possible impacts and mitigation measures. Institutional arrangements and GRM procedures under EDEIP were also discussed. The proposed activities are in line with National Electricity Policy 2021 to support MoE-PD fulfil its policy mandate under the National Electricity Policy 2021, and implement power sector reforms focusing on two priority areas of the government. These are: a) supporting governance and institutional reforms; and b) supporting transition to wholesale electricity market through commencement of the Competitive Trading Bilateral Contract Market (CTBCM).

In addition to the engagement with IAs, during the preparation stage, consultations¹⁹ were also held with different stakeholder groups and their representatives in KP, Punjab, and Sindh between December 2020 and November 2021. Consultations were held with the project implementing agencies, with NGOs and CSOs representing the perspectives of interested groups and community consultations highlighting the concerns of disadvantaged and vulnerable groups. Due to the prevailing Covid-19 restrictions, limited consultations were held in person, and others virtually through video conferencing, phone calls and online workshops. Additional consultations in particular with disadvantaged and vulnerable groups will be held within 90 days of project effectiveness. In addition, stakeholder mapping and identification was strengthened, by conducting a component/sub-component wise analysis, through discussions with the relevant implementing organizations. An outline of concerns raised in these consultations is presented below and detailed stakeholder consultation tables are provided in annex 3.

Institutional Stakeholders:	If space is available in a proposed Grid station, develop a proper landscape of indigenous flora to balance the already disturbed vegetation cover.
	Compensation made in lieu of damages caused by WAPDA/PESCO transmission line is usually not appropriate and not on time.
	In the recent past during public hearings of various NTDC and WAPDA projects, the affectees raised concerns that the compensation paid for the damages caused due to the proposed developmental activities is not appropriate.
	Purchase of local machinery will reduce the cost and prove to be technically beneficial.

¹⁹ These consultations were conducted according to the guidance for stakeholder consultation provided by the World Bank's environment and social team which, in turn, is based on the guidelines of the WHO.

	During extension of a particular road/ canal bank, the Irrigation department faces difficulties and therefore proper permission may be taken before erection of poles/towers along the road side or canal banks.
	Uniform interior design should be implemented for government offices according to their use of energy requirement.
	Cost effective and environment friendly electric appliances be introduced.
	Clean, and renewable energy projects be promoted particularly, solar energy projects in MEPCO jurisdictions.
	Austerity measures, air conditioning policy and timing, and efficient appliances be adopted.
	Awareness program at the domestic level should be organized for safe energy usage.
	Awareness and sensitization sessions on Net-metering projects should be conducted among the consumers of electricity so that they may sell excessive electricity back to distribution companies.
	Underground electricity distribution be promoted. It will be helpful to reduce electricity theft, less hazardous to human life and livestock, be better aesthetically and prove to be environmentally friendly.
	Plantation of deep rooted trees and long life trees to prevent from wind at the generation sites.
	Tree plantation along the transmission lines route and grid station site can control the dust that may be generated.
	Need to minimize occupational threats to life and ensure labor safety.
NGOs and CSOs	A compensation plan for communities is necessary in situations of land acquisition. The land of people living in these areas is impacted and compensation should be at the market rate. The same applies in situations of land acquisition for grid stations.
	High transmission lines in cities should not be near houses/ apartment buildings as it is dangerous.
	Urban land which is fertile should not be used for transmission lines and tower erections.
	Complaint cell should be accessible. There should a booth to provide services. Billing is easy and facilitated so there should also be an easy complaint mechanism in place.
	A Social Assessment should be conducted to gauge how many people will be impacted as their livelihood, and housing will be impacted, along with any livestock that they own.
	Involve and engage the local communities from planning to execution of the project and pay proper compensation to the affected persons and households.
	Concerns regarding the health and safety mechanisms during the project should be addressed.
Community Consultations	Issues of over -billing take considerable time for settlement.
	Grid station communities have not faced issues with regard to construction/maintenance within the grid station, transportation of heavy equipment or in the context of site restoration after working gangs complete their tasks.
	There are acute problems of power outages for extended periods of time.
	The GSS staff often face unrest due to prolonged power outages.
	There is a need to improve the power voltage.

	Commercial activities are badly impacted due to power outages.
	The proposed grid station may decrease the value/price of the land of people in the area. They also inquired about the payment of land and possible jobs/employment opportunities due to the proposed project.
	Hanging of domestic/commercial meters on the poles is hazardous and can lead to sparking.

Compensation and land related issues will be addressed in accordance with the Environmental and Social instruments (E & S)²⁰ prepared for the project. For matters pertaining to occupational health and safety concerns will also be considered and an occupational health and safety plan will be adhered to. In fact, World Bank EHS guidelines mainly on occupational health and safety, community health and safety as well as on construction and decommissioning will be adhered to. It contains guidelines which are cross cutting on environmental (waste management, ambient air quality, noise and water pollution), occupational health and safety issues among others, applicable to all the industry sectors. The social risks and issues for the rehabilitation/upgradation/augmentation works are expected to be insignificant, since only the existing right of way (RoW) and land of the facilities will be used. Communities will need to be fully brought on board through effective communication and consultation, among other aspects for the use of ABC to increase its acceptability and avoid any risks to the project.

ii. Gender

Women in Power Sector Professional Network (WePOWER)

To help address the gender employment gap in the Pakistani power sector (and other countries in the South Asia Region) the World Bank established the South Asia Women in Power Sector Professional Network in 2019. The World Bank has renewed its commitment to WePOWER until 2024 under the South Asia Gender and Energy Facility II (SAGE II) program. As part of EDEIP, on June 2, 2021 SAGE II hosted a forum with Pakistan DISCOS to share how WePOWER can be effectively leveraged to achieve organizational diversity and human resource goals towards and promote gender equality in the Pakistani energy sector. The Forum is organized in the context of preparing for Bank financing for EDEIP. It included WePOWER Partners from Pakistan and other South Asian countries and different Pakistani Distribution Companies (DISCOs) in a forum to exchange ideas for increasing workforce participation of women. The agenda is included in annex 4.

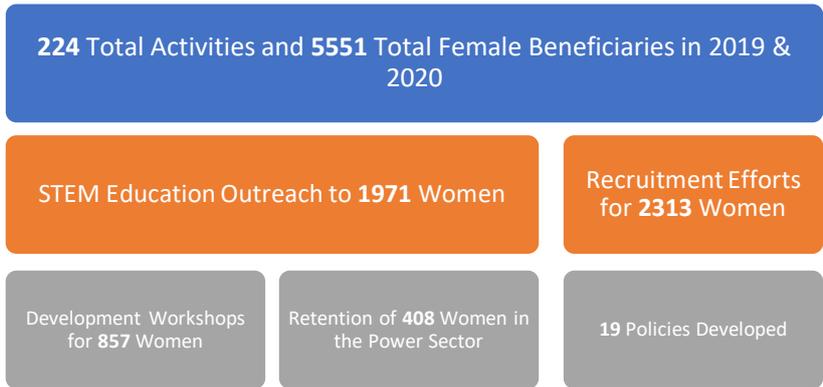
According to the World Economic Forum Global Gender Gap Report 2021, Pakistan's gender gap has widened as it ranked 153rd among 156 countries assessed. Pakistan is placed at 152 in economic participation and opportunity, which is among the top 10 countries with the largest gap in this sub-index.²¹ This reality is reflected in the Pakistani power sector, where a 2019 baseline assessment by the World Bank found the total representation of women to be only 3.6% of total employees. This figure was only slightly better for women technical employees at 4.6%. The sampled DISCOs had a lower than average number of female employees, at 1-2% of total employees.

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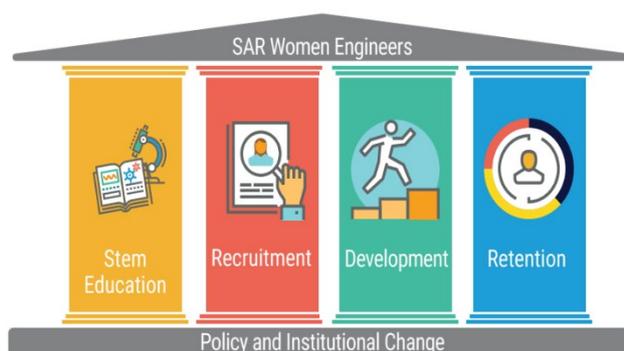
²⁰ Under the EDEIP, a number of environmental and social management documents will be prepared including the ESMF, RF, SEP, ESIs, LMP, and various plans based on the frameworks once specific information on locations is available. These include ESMPs, and RPs.

²¹ <https://www.dawn.com/news/1615763>

Network in 2019. The World Bank has renewed its commitment to WePOWER until 2024 under the South Asia Gender and Energy Facility II (SAGE II) program. One of the key goals is to increase the number of WePOWER Partners in Pakistan from 5 to 50 partners by 2024. It is a Regional Professional Network that will:



- support higher participation of women in the energy sector and utilities
- foster higher retention and professional development of women in the energy sector
- promote normative change regarding women and girls in STEM



WePOWER is designed to address several barriers to women’s employment identified in the qualitative research:

- Lack of female role models and mentors for students and professional women in STEM
- Limited networking opportunities for women in STEM
- Limited exposure to new ideas and desire for professional development
- Ad-hoc gender friendly HR policies and facilities

WePOWER Partners implement gender activities under 5 pillars illustrated in the diagram above. At present, WePOWER has 27 Partners of which five are from Pakistan. These are **K-Electric, Water and Power Development Authority (WAPDA), Women in Energy Pakistan (WiEP), Women Engineers Pakistan (WEP), and Pakhtunkhwa Energy Development Organization (PEDO)**. Partners in Pakistan have completed a total of 224 activities helping 5551 female beneficiaries from 2019-2020. Last year, in response to the COVID19 pandemic, they hosted the largest virtual job fair ever in Pakistan, with 530 female students participating and networking through the event.

The big success areas in Pakistan have been STEM outreach and job outreach activities. Other areas of focus have been activities on professional development, retention and policy and institutional change. On the latter, WAPDA and K- Electric are the driving Organizations.

The forum discussed the gender employment gap in the energy sector today with representatives from Pakistani DISCOs speaking of their experiences and sharing information on the hurdles women face in the power sector in Pakistan.

There are roughly 4 women for every 100 men and globally the average is 64 women for 100 men and even there, there is a long way to go. Pakistan is achieving 1/16th of what the rest of world is achieving. In terms of women employed, 7% are in mid-level managerial positions, 2% in senior management

2% and in executive management, 4% of the work force are women. Covid 19 has disproportionately affected those sectors that employ a significant majority of women and they are disproportionately affected as well.

The power sector in Pakistan is undergoing a transition in terms of reskilling and transformation of DISCOs with smart technology, using data mining and analytics cloud based systems and Artificial Intelligence. There is an opportunity to work through STEM education system to increase pool of talent av to power sector and improve the ratio of women employed in the power sector.

The focus of the discussion was on learning from other utilities in Pakistan and the region and sharing of experiences and lessons learned to capitalize on opportunities to keep pace with an evolving energy sector.

LESCO- LESCO participants explained that there is a weak representation of women in the distribution system of Pakistan. It is 100 % male dominated from line staff to operational staff. Women only present on the commercial side and specifically in recovery. Bill distributors and meter readers are also male. The representative did not envision any change in the next five years. NEPRA making some changes to an open mkt. More focus on management positions- commerce, legal and finance which will provide opportunities for women Female representation is a serious issue although there is a female quota policy of 10%. Recently in Jan 2021, 82 electrical engineers. were hired. Women do not go to the field and try to get assigned to head offices and not have a challenging profile which needs to be addressed

K-Electric- In K-Electric, women comprise 3.5 % of the employees and their overall representation in distribution companies is over 2%. Quite a bit of effort is being made and enabling activities are being undertaken to encourage women. The Engineering department is male dominated and considerable work has been done to understand the hurdles for women- for instance work parameters physical work, shift timings, long hours, support required in work place to give them encouragement and strength so they stay on. The latest change is that now there are over 40 females meter readers which is a primarily a field job. In the process of reviewing work parameters an initiative taken is of women working on the grids. Training and apprenticeship programs have also been examined. The issues do not necessarily commence at the work place, support has to be provided during the period of a girl's education as well. 41% girls graduate from engineering colleges, but only 14% comprise the actual work place. Mentorship programs needed as well as role models. Lean n Circle is a global mentorship program which is in place at K-Electric with moderators holding monthly and quarterly sessions to understand the issues women are facing. This is platform where their voices can be heard like WePOWER. There has been considerable improvement in areas where women are engaged. For instance among meter readers, there is a 40% improvement on the reading side in terms of accuracy while in the area of recovery, more than 70% improvement has been seen. Recently it is mandated that interview panels have a good representation of women to ensure that unbiased hiring and promotions take place.

WAPDA- Some steps to encourage women included Ted talks selected women as role models who are leading Government departments and facilitated universities and briefed them on conducive policies for women which are women friendly. For instance, a married woman is posted according to where her husband is, and separate rooms are provided in the power house for women. The actual issues are cultural impediments embedded in society at the institutional and policy level. For fostering a conducive environment, anti-harassment lectures need to be given at the work place to apprise women of their rights and protection. As far as retention and training, unless equal opportunities are provided, there will not. be equal opportunities for women to develop their expertise and grow

professionally. Induction training followed by on job training and refresher training courses and opportunities are ensured for female employees. For instance, foreign trainings related to special equipment imported for a particular power house which is referred to as factory acceptance test. Mostly it used to be men going as it was asserted that women would not be posted to these power houses. Other courses offered are junior management course, mid management course and senior management course and these WAPDA training institutes are available for all DISCOs.

PESCO- Female workforce participation has increased but not significantly. New technologies and a one size fits all solution cannot be implemented in Pakistan as there is a different culture prevailing in each company and the solutions have to be tailor made. In PESCO for instance female meter readers cannot be employed due to the cultural values and norms as well as the security situation. Using new technologies now where there are opportunities for women and a more secure work environment.

Other issues and solutions that were mentioned included:

- The culture and working environment in the DISCOs is not very comfortable for retaining qualified women. (HESCO)
- There are cultural impediments due to male domination and WePOWER is trying to raise awareness according to it's 5 pillars. In a panel of section boards, women representation is essential, separate rooms, day care facilities, accommodation of married women in postings and other administrative facilitation is being done. The female quota in bank projects should be increased to 15% and specific posts only for women should be ear marked in the PC-1. Also accommodate children of employees, specifically daughters should be accommodated and cultural taboos can be addressed. About 5% of half of the quota can be specifically for women. (WAPDA)
- Parents and teachers are sensitized and their awareness improved on the importance of STEM education for girls by conducting seminars and inviting different schools to attend (IESCO).
- Put a logo on electricity bills to educate parents on STEM education and the message would be widespread (IESCO)
- Retention programs are not successful due to cultural and social conditions. For instance, there is only 1 women working in the accounts office (TESCO)
- Women Engineers Pakistan is working with undergraduate students and would like some support in bringing their skills at par with the industry. Also working with high schools in 9 cities in Pakistan and encourage talking about the importance of educating parents and young girls on STEM education. Looking for role models who are identifiable in our stories and opportunities to collaborate. Also conduct internships and work to match women with job opportunities and do mock interviews and webinars online. (Women Engineers Pakistan)
- Placed a fellow in WAPDA for 3 months to conduct research on intersection between gender and energy. Mentored by WAPDA and Women in Energy Pakistan working collaboratively as partners in this regard. Also collaborated with a solar company in Lahore and conducted trainings of young engineers to provide hands on training on solar installation and can do similar trainings for DISCOs. (Women in Energy Pakistan)

For a DISCO to join WePOWER entails working with a focal person in the organization to formulate the activities, targets and connect with others, along with advisory support. Financial resources may also be available. If the concerned DISCO is already in a WB project, the company may use the project budget to implement the activities.

iii. Stakeholder Consultative Workshops

As a final step in the preparation phase, each DISCO organized virtual consultative workshops to bring together all relevant stakeholders on one platform and apprise them of the impending project and its focus and to incorporate any concerns stakeholders may have regarding environmental and social aspects of the project. These workshops were held by MEPCO on 15 June 2021, HESCO on 16 June 2021 and PESCO on 17 June with a broad spectrum of relevant stakeholders ranging from Government departments to civil society organizations. Specific input and feedback was collected and any concerns that stakeholders may have at this stage were recorded. Given the need for social distancing and protocols in place, these workshops were held virtually, with a few stakeholders present in person in the respective DISCO offices. The information collected has been incorporated into this SEP and is summarized below. Detailed workshop notes are provided in annex 5.

Summary of Consultative Workshop by HESCO

Stakeholders Comments and Suggestions	HESCO's Response
With reference to environment and social commitment plan, can you please tell us which plan do you have which will be implemented at gross root level to minimize the environmental risks?	Environmental and Social Management Framework and environmental and social management plans will be prepared and implemented.
The environmental and social risks identified are: the impact on crops, livestock, on overall environment, and impact on communities. A detailed environmental and social assessment should be carried out before launching the project. The communities which will be affected by the project should be involved in the project.	Environmental impact assessment study which will be submitted to the provincial environmental regulatory agency and World Bank for approval shall cover the aspects like population in the right of way, relocation, birds and wildlife sanctuaries. We do not disturb environment such as if there is a wetland, we do not erect tower in that location. It is our principle and we find an alternate location. Your suggestions and points are valid and will be addressed in the report.
Will documents like environmental and social risk management framework will be implemented later in true letter and spirit? The history tells us that HESCO has not put in place an effective grievance redressal system for its customers. As per standards of the World Bank, how would the grievance mechanism be put in place to address the grievances of its customers.	As far as the project is concerned, we conducted this workshop to get feedback from the participants. We established the grievance redressal committee at HESCO level in which members from the communities and local management were part of the committee. For this project, a three-tier grievance redressal mechanism has been designed to provide a time bound, early, transparent and fair resolution for affected persons and other stakeholder's grievances regarding environmental and social management of each sub project.
HESCO has to take care of their organizational staff who will try to send wrong messages to the community through the community as HESCO is going to engage with some communities first time on this project . It is a big risk and should be	HESCO will ensure that only the authorized person will conduct the consultations with the affected communities and ensure that the message to the communities is clear and easily understandable.

<p>taken care during the implementation of the project.</p>	
<p>Depute or identify focal persons at the cluster level or colonial level who should bring the grievances of the community/customers to HESCO and at central level and those grievances should be timely addressed in a dignified manner. It is learnt whoever comes at your grievances desk they are merely addressed. If you appoint citizens or your customers as focal persons of grievances that may effectively address the customers concerns.</p>	<p>A three-tier GRM has been designed to provide a time-bound, early, transparent and fair resolution for APs' and other stakeholders' grievances regarding E&S management of each subproject. All complaints received verbally or in writing will be properly documented and recorded in the Complaint Management Register(s). In addition, an easy-to-access web-based system will be developed to receive the complaints. If the complaint cannot be resolved at these three tiers, the complainant will have a choice to lodge his/her complaint at the related court of law. Currently in HESCO, there are different systems in place. We are available for the public on a 24 hour basis. Every sub division has complaint center. Similarly at division level, sector level and headquarter level also has complaint centers. If the complaint of a person is not resolved and he contacts us again, we resolve the complaint from headquarters. The system is already in place but due to unawareness, not all people knew about it. We have advertised the complaint numbers of HESCO in newspapers.</p>
<p>HESCO should have one desk or counter in its office or regional centers where the customers/consumers note down their grievances and those grievances must be addressed.</p>	<p>PMU will discuss this suggestion with management and decide how to proceed.</p>
<p>There is provision of grievance redressal committee in your social and environmental impacts framework documents. That committee should be actively engaged and they should regularly meet. The departments face different consequences during implementation of project due to weak GRC. This should be taken care during implementation of project.</p>	<p>It will be addressed during the implementation of the project</p>
<p>A survey to identify environmental and social risks related to HESCO operations should be conducted in the areas where the project is going to be implemented so that those risks should be covered in the project</p>	<p>Environmental and social studies will be conducted in the project areas and environmental and social management plans will be prepared to address the E&S risks during the implementation stage of the project.</p>
<p>How will we ensure the strong input from the stakeholders at the grass root level? How can we ensure strong coordination between stakeholders and grass root level communities?</p>	<p>We have noted all your suggestions and will address them in the environmental and social management documents.</p>

<p>To mitigate environmental and social risks, the safety sign boards and direction lines can be installed and awareness can be provided to communities about the hazards associated with the transmission lines.</p>	<p>The system which is existing is 40-50 years old and new system will be an updated one. All the safety measures will be considered during the erection of towers, transmission lines and upgradation of grid stations.</p>
<p>When we talk about new construction, can we say that there will be difference in construction activities in rural and urban areas. Will the transmission line go underground in urban areas?</p>	<p>We do not have an underground system. All the existing systems are overhead. The clearance from the ground will be done in a proper manner with safety protocols.</p>
<p>Can you please tell us under which circumstances this environmental impact assessment is being planned away? Is it under PEPA 1997 or under Sindh Environmental Protection Act 2014? Under section 17 of SEPA2014, if a project is launched in Sindh, the professionals of Sindh EPA and academic institutions should be taken in consideration for carrying out this exercise and other condition is of WB.</p>	<p>This consultation which HESCO is conducting is in response to the requirements of the Provincial Act as well as the WB requirement. HESCO conducted the consultations earlier and will keep on doing so in future as and when needed in response to provincial law and WB requirements. HESCO plans to conduct an environment and social assessment in response to the Provincial Act as well as the WB requirement. This consultation is part of the process. The project and HESCO are going to meet the requirements of the provincial law as well as the WB.</p> <p>A stakeholder engagement plan will be prepared for the project which will not only report on consultations carried out so far, but will also provide a road map for future consultations during different phases of the project.</p>
<p>What is the level of understanding of the community about environmental and social risks? The technical terms need to be presented in a very simple form to the community. The questions during focus group discussion should be based on level of understanding of the community. There will be housing, forestry, and industries in the areas of operation of HESCO. All the issues need to be discussed separately with the community and in easy language.</p>	<p>HESCO will ensure that the consultations with the communities would be meaningful and all the environmental and social issues will be discussed in easy language.</p>
<p>There are some serious issues which need to be taken care during the project. If they are not addressed in the beginning, then many problems related to health and safety, environment and social will erupt. Educational institutions can have meetings with HESCO as and when required and also can offer their services for baseline studies and impact assessment for the project.</p>	<p>HESCO will consider this suggestion</p>
<p>If you need any help, Institute of Environmental Engineering, Mehran University is available to provide services. We have capacity/facility of</p>	<p>This is much appreciated and valuable. The project and HESCO will try its best to utilize your</p>

analysis of water. All kinds of analysis could be done here. If there is any issue of solid waste management and consultations, we can provide our services to guide the project teams.	facility and available expertise of your institution.
Sindh Irrigation Development Authority (SIDA) is extensively engaged with the communities and can provide services in the areas where your activities will be carried out. You will not be able to establish a large social setup. We are already a registered government organization and we will help you in implementation.	HESCO's environmental and social cell will coordinate with SIDA and seek their help if required.
There should be a centralized system in HESCO where all information should be available. The benefit of it will be that the recoveries, losses and maintenance challenges will be solved. If you will include GIS component (mapping) in it, then it will be easy to identify losses in a specific area by marking it on a map.	Your suggestion is very valid.
There are different tools available to engage with the community. For example, arrange orientation workshop, focus group discussion, seminars, and conferences. Sustainable Actions to Access Financial Capital Opportunities.SSF can help the project in organizing consultations in the areas where the organization is working.	HESCO shall consider this suggestion
It is a suggestion that the stakeholder forum should be formed. SIDA can share the document with HESCO which explains how the communities and stakeholders were engaged by SIDA .	We will review the SIDA Consultation document and consider the recommendations that can be adopted as a good practice.
SSF suggested that HESCO should call an introductory meeting of the institutions/NGOs working in the target area of HESCO. In this way, HESCO will be able to know about their areas of work and level of expertise and can engage them in the future based on their expertise. They will be able to learn about the issues of those areas	We have noted your suggestion. The consultations with the stakeholders will continue through the project life to ensure stakeholder feedback is collected and relevant recommendations are considered.
Development of an application which should contain data of different stages of the project would be useful.	This will be discussed with the management for the development of the overall project database.
WAPDA and Irrigation departments are engineering organizations. The training should be provided to engineering staff on environmental and social aspects. It will help them in understanding the importance of environmental and social aspects.	A training program for the staff has been included in the ESMF and will be implemented by the project.
Mehran University of Engineering and Technology(MUET) has capacity to provide	HESCO shall consider this option

trainings in the field of health and safety and can offer services to HESCO	
It was suggested that data should be digitized for readily accessible information	This is a very good suggestion
Trainings should be arranged on environmental and social practices with special focus on risk management.	A training program is proposed in the ESMF
Can you please share the environmental impact assessment and ESMP of the project? What will be the mechanism of addressing persistent non compliances by the contractor?	We are in the process of preparing these documents and when completed will be shared with the stakeholders
The establishment of a working group on environmental and social framework will be helpful. The project should identify most relevant departments which could contribute on environmental and social aspects.	HESCO shall consider this suggestion
A Grievance redress committee will be developed for this project. A similar type of committee was developed for SIDA. We can share those documents which explained the formation and working of committee with the HESCO	HESCO will consider this information if it is shared with the project PMU.
Roshan Pakistan app like system should be introduced. HESCO should develop such app and it should be user friendly.	We have noted this suggestion

Summary of Consultative Workshop by MEPCO

Stakeholders Comments and Suggestions	MEPCO's Response
The environmental and social impacts of the project need to be considered on vegetation/trees, impact on settlements, on cultural heritage and other things which will come in the right of way of the line. If there are existing trees/plantation, how many numbers of trees/plants we can protect, how many numbers of trees will be replanted and what will be impact on health of local people and on the environment.	We shall incorporate these suggestions in the environmental and social management assessments being prepared for the project.
Whenever there will be construction of new transmission lines and new grid stations, there will be positive social impacts on the local people. People will be financially strong. New job opportunities will be created. New factories can be established with the reliable and continuous power transmission and people of the areas will get more jobs and earn livelihood. There will be improvement in	We are thankful that you highlighted both positive and negative impacts of the project. The project will comply with the World Bank Group environmental health and safety guidelines/WHO recognized standards on electric and magnetic fields through design considerations

<p>agriculture. The areas where canal water is not available people can install new tube wells with this power and can irrigate their fields.</p> <p>The electromagnetic field is harmful for birds and plants and it is also harmful for human health. These are reported in various studies. There are negative impacts of these Transmission lines which include depression, aesthetic harm, noise and danger for air traffic.</p>	
<p>You will develop the grid station and the transmission line which will pass through the land, is there any legal mechanism that will be followed by MEPCO for land acquisition or payment of compensation?</p>	<p>Regarding land, MEPCO tries to construct grid station on the government land. The government land is transferred to the department through a system by the board of revenue. We do not acquire the land for erection of tower or transmission line route. As per our policy, only compensation of losses is paid to the affectees. There are 10 standards of the WB and standard 5 deals the land acquisition, compensation payment and restrictions on land use. Under standard 5, there is compensation for the land which is under the tower even if it is not acquired. The losses in the form of crop or restrictions will also be paid/compensated. The engagement of the WB with MEPCO is based on the understanding that the compensation will be paid of the transmission line towers and losses. It is a requirement of WB that the compensation payment process will be completed before the start of any civil works at site.</p>
<p>These days the focus of the government is to produce electricity from solar. The people who are producing electricity from solar and that is included in the grid through reverse metering system. Is there any mechanism in MEPCO to give incentive or promotion to such producers or community?</p>	<p>There is an already established mechanism in the department to purchase electricity from the community which is produced through a solar system.</p>
<p>Is it compulsory that the constructions will be carried out at the sites which are specified in this workshop or have you considered alternate sites as well? In some cases the sites are located in areas which are very busy or commercial and their negative impacts override positive impacts. Please consider option of alternate site selection.</p>	<p>These sites are only the identified ones and not compulsory. TA site is selected where minimum environmental and social issues are involved. The selection process is carried out by a committee of eight people. People from different allied sections are included in the committee. Two to three alternative sites are studied and the most feasible one is selected. The sites which are selected</p>

	should be away from the population and should have an independent entry and exit. The grid sites should be near the already passing transmission line. Our grid station sites are within 500-1000 m of the line. Only at one site this distance is more.
Please consider the electromagnetic impacts and address those impacts.	It will be considered during the environmental and social assessment studies.
It is mentioned that the trees will be cut and new trees will be planted in other areas. When one mature tree is cut down that absorb the 48 pounds of carbon dioxide from the atmosphere and new planted tree takes time to absorb carbon dioxide. It is a good initiative but there should be other ways to protect the flora of the area which will be impacted by the transmission lines.	The clearance of trees and structures under the transmission line is necessary and cannot be avoided. The RoW (i.e.,30 m) should be clear from vegetation. We cannot replant tree under the transmission line and other areas are selected for that purpose. The type of tree is selected keeping in the view the area. we are aware of this issue and exploring to plant the new trees. A tree plantation plan for the project will be prepared and will ensure that the plantation ratio should be from 1:5 to 1:15 normally. The number of replanted saplings is more. We will ensure that the sapling should be planted before the cutting of the tree so that there should not be more imbalance in carbon sequestration.
With the transmission efficiency, if we focus on solar power then we could reduce the tree cutting and it will be environment friendly. The developed countries are also adopting solar power now a days	Transmission lines would be required in any case whether the power comes from hydro, solar or wind. The basic infrastructure is critically required.
The areas from where the transmission line passes, the value of land is reduced underneath these transmission line. You did not acquire that land and only compensation for crop losses is paid. The permanent value of land is reduced. There should be policy to compensate land owners as the value of land is reducing permanently	We agree that the value of the land which is under the transmission line, is decreased, whereas in other projects, like roads the value of land is increased. The process/system is now changing. This will be addressed in the RF.
For plantation of new trees, if you engage community then it will be successful. The community will look after the trees. If there is any such policy please explain.	Regarding tree plantation ownership, we plant trees at the grid station site and maintenance of the trees is the responsibility of the contractor for a minimum of two years and its cost is included in the BOQ. For plantation in the schools which will be located near the construction sites, we suggest that teachers and students be involved and look after the fruit trees and eat the fruit as well. School management committees should be engaged in this.

The involvement of school children in planting trees will be very helpful.	It is very good suggestion and shall be considered
You know the route of transmission line and know that the trees will be cut from these areas. It is suggested that you involve the community at the beginning and start planting the trees so that when you cut the trees from the route, the replanted trees will be grown and will take their place.	It is very good suggestion and shall be considered
Public consultation is required to resolve the issues of affected people. In tree plantation, involve the district management (DCs) and they will bound the government departments to carry out the plantation. Is there any technique available to reduce the impact of electromagnetic waves?	One solution could be that underground cables should be installed. It could be a possibility in the near future. However, for this project the transmission lines will be constructed overhead. No other option is currently available in Pakistan.
How can we handle the losses which occur due to the rains and how can we ensure the safety of the houses from where the transmission line passes?	Our safety cell will provide awareness to the people about the electric wires. They should keep distance from TLs in the rainy season.
Few years back, one project started drilling in the riverine belt of Multan area and there was a rumor in the area that this drilling is being carried out for exploration of oil and other minerals. People who were aware of the project, they started purchasing land in that area to earn profit. Similarly, it is known fact that the value of land which is under tower and transmission line is reduced so the people will start selling their land before the start of the project. Is there any strategy/policy by MEPCO to curtail such practices?	We are bound to inform the community about the proposed project. The community should be aware of the development. If we do not consult with the people and provide them information then we are violating guidelines of the EPA and WB. Our transmission lines pass through mostly unpopulated areas and there are no negative impacts on land and land-based assets. The reduction in value of land could be in the commercial areas which are very few.
Sign small ventures with the organizations working in social sector for organizing and conducting consultations with the communities.	This suggestion will be considered.
The labor department suggested that they can help MEPCO in planting trees through the factories. The number of trees to be planted can be assigned to the factories keeping in view the size of factory.	It is a good suggestion. MEPCO shall involve the Labor department during the implementation stage of the project.

Create WhatsApp group of the stakeholders and share your work progress in the group.	It is a good suggestion. We shall look into it.
An implementation mechanism will be developed for the project and different departments will be part of it. It is suggested that after finalization of mechanism, MEPCO should provide trainings to the people of those departments.	We shall incorporate this suggestion.
Make a portal of the project and provide awareness to the people. People should use that portal to launch their complaint.	We shall consider this suggestion
All the communities are not educated and cannot use portal. The mechanism should be simple. The project should share a phone number with the communities to launch the complaints.	It is our practice that whenever we go in the field, we share our number with the communities.
The complaints received by MEPCO from communities always remained very common like tripping of unit, load shedding etc. Instead of a centralized grievance redressal system you should form small units in different areas to resolve the grievances of people at the spot. It will be helpful.	We shall consider this suggestion

Summary of Consultative Workshop by PESCO

Stakeholders Comments and Suggestions	PESCO's Response
The environmental impact that you identified included terrestrial habitat alteration, tree cutting and impact on wildlife. Have you done an assessment that how many number of trees will be cut and what is program of replantation?	When we cut one tree, we replant three trees. It is our policy. In this project we have selected those location where no tree cutting will be involved.
Are there any excavation activities involved in this project? If yes then how will you dispose the spoil material?	We shall work at the existing facilities of grid stations. The locations where the capacity of transformer is small, we are going to install large capacity transformer or along with that we shall install another transfer. The foundation pads for these transformers are already established. No major new construction or excavation will be involved in this project.
Will you involve third party for monitoring of air and noise pollution during construction phase?	It will be considered during environmental and social impact assessment studies and if there will be any sensitive locations near the construction sites, the

	<p>project may engage a third party for environmental monitoring. During our consultations with grid station staff and communities living near the grid stations, we asked people about their views regarding noise pollution during work at grid station or during installation of new equipment. They explained that there is no such problem of noise due to construction at the grid station. The working gang was also consulted and they explained that they carry out our activities during off peak hours so that there should be minimum or no disturbance to the communities.</p>
<p>Which hazardous material will be used at this project?</p>	<p>There is no such use of hazardous material in this project. The only hazardous material is only transformer oil. The highly contaminated oil has been excluded/banned from the system and we have included in the bidding document that the mineral oil will be provided for the transformers which will be PCB free. The transformer oil comes in large drums and these drums are reused.</p>
<p>The grid station where the improvements will be done, the old wires will be changed. What is plan for safe disposal of those wires?</p>	<p>The conductors which we are going to replace will be collected from the site and will be brought to the main store. We have a disposal directorate. They do auction of this material and vendors bid for the material.</p>
<p>The electricity bills are going up and availability of electricity is short. There is frustration among the masses. Will there be any impact of this project on electricity bills?</p>	<p>We are going to install ABC cable and the bare conductor will be replaced. The commercial losses and technical losses will be controlled. There will be an impact on electricity bills as well.</p>
<p>What will be impact of this project on load shedding?</p>	<p>We are going to upgrade the system so that the load shedding could be reduced.</p>
<p>In the hilly areas of Swat there are two hazards which hinder the supply of electricity. One is flood while the other is strong winds. The electric transformers which you have installed near river Swat or in other flood areas, will you also change these transformers in those areas? Have you done any survey in this regard?</p>	<p>We are currently dealing with the large transmission lines (132 kV). The transmission line which you mentioned is an 11 kV distribution line. We have a separate directorate to deal with these lines and its issues.</p>
<p>Is there any specific package under this project for education and health institutions? Will there be any provision of dedicated transmission lines to these institutions?</p>	<p>There are formations which are defined as sensitive and are exempted from load shedding in the areas under PESCO. There will be load shedding only in case of major faults,. Educational institutes and hospitals are included in those sensitive formations.</p>
<p>The transformers are very heavy how will you transport these transformers to hilly areas like Malakand division and Hazara division where the load capacity of bridges is less?</p>	<p>We construct the grid at those locations where a proper access road would be available. The equipment is very precious and we do not plan activities in a location where access is not possible.</p>

	There is a committee which selects the site for construction of a grid station.
Currently you will work on large transmission line, is there any plan to upgrade the small transmission lines which transmit power to villages?	We are also working on feeders and expansion work is also in progress.
During construction activities there will be disruption in power supply. Is there any alternate plan for those areas so that the people should not suffer?	In case of long load shedding, we issue a schedule and share with the public. Our repair and construction activities are normally carried out in off peak hours. We shall arrange alternate transformers for a continuous power supply.
In Charsadda, there is load shedding of 10-12 hours. The Bacha Khan University Charsadda is located in a security risk area. Is there any provision of dedicated line for the university in the project?	The feeders of Charsadda area are included in the project. Load shedding shall be controlled with this upgradation. There is no provision of a dedicated line for the Bacha Khan University in the project.
Tree cutting should be avoided. The wildlife is disturbed due to cutting of trees.	We have noted your point and will incorporate it in the relevant E&S management documents
It is explained that trees will be replanted with 1:3. There are forest trees which take years to grow. If we replant two to three trees as an alternate of large grown trees. Will it be a good alternate?	We are going to upgrade existing grids and no tree cutting will be involved in it.
The labor who will be working on the project and expired as a result of an accident during the construction activities. What are provisions in the project for such labor?	The ten standards of WB are above the national law. Labor management procedures will be prepared and all labor issues will be covered in this document. Special clauses in the contract will be added in the contract. The contractor will implement those measures and the DISCO will monitor the implementation.
When the transformer of an area in Lower Dir becomes out of order, the people of community arrange the repair by themselves. There should be mechanism that in case of damage there should be provision of alternate transformer to that community so that there should be no disruption of power.	We have noted your comments.
The themes on which WWF is working, we can provide you technical input on those themes/aspects. We can tell PESCO about the type of trees in different areas of KP, damage on tress, alternate plantation, impact on wildlife and impact of climate change.	We shall coordinate with WWF.
If the project requires an input from WWF, we can provide our input in written form. We can visit the sites and also can conduct meetings.	PESCO will consult with WWF and seek their guidance through the life of the project.

The stakeholders were willing to provide help in areas of disaster management, community engagement and advocacy.	PESCO appreciates this support and will benefit from relevant stakeholder expertise.
The stakeholders were willing to participate in workshops/trainings arranged by the project.	PESCO will arrange trainings and involve stakeholders on environmental and social issues

Further consultations (as required) will continue to be held to seek additional input and the SEP will be updated and disclosed accordingly.

4. Stakeholder Engagement Program

4.1. Purpose and timing of stakeholder engagement program

The approach for the stakeholder engagement analysis will be underscored by three elements: (i) belief in the primacy of qualitative data; (ii) commitment to participatory methods; and (iii) flexible responsive methods. An inclusive and participatory approach has been followed taking the main characteristics and interests of the stakeholders into account, as well as the different levels of engagement and consultation that will be appropriate for different stakeholders.

In general, engagement is directly proportional to the impact and influence of a stakeholders. As the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group should intensify and deepen in terms of the frequency and the intensity of the engagement method used.

The different combinations of influence and importance that a stakeholder may exercise are elucidated in the diagram below. This formulation is based on individual interviews with representatives from the various organizations, which have been consulted to date. The table may be populated as more interviews and group consultations are conducted throughout the project cycle. A majority of the interviewees play an important role in the power sector and have considerable influence. Their input is therefore critical for this project to highlight important issues that the project may address in its implementation phase.

Figure 2: Stakeholder Influence and Importance

		Degree of Influence	
		High influence	Low influence
Degree of Importance	High Importance	<p>Box A: Stakeholders who stand to lose or gain significantly from the project AND whose actions can affect the project’s ability to meet its objectives</p> <ul style="list-style-type: none"> • MoE-PD • HESCO • MEPCO • PESCO 	<p>Box B: Stakeholders who stand to lose or gain significantly from the project BUT whose actions cannot affect the project’s ability to meet its objectives</p> <ul style="list-style-type: none"> • Communities near grid stations • Beneficiaries of the project • Other vulnerable groups
	Low Importance	<p>Box C: Stakeholders whose actions can affect the project’s ability to meet its objectives BUT who do not stand to lose or gain much from the project</p> <ul style="list-style-type: none"> • Relevant ministries and government departments/organizations such as ministry of Labor, Revenue, Agriculture, Irrigation, and Provincial EPAs. • NGOs 	<p>Box D: Stakeholders who do not stand to lose or gain much from the project AND whose actions cannot affect the project’s ability to meet its objectives</p> <ul style="list-style-type: none"> • Academia • Local CSOs

This matrix provides the framework for stakeholder analysis which will be updated within 90 days of project effectiveness and will continue as needed through the project cycle.

The stakeholder engagement program aims to: establish a systematic and inclusive approach to stakeholder engagement; build and maintain a constructive relationship with stakeholders; incorporate stakeholders’ views and concerns into project design/implementation; mitigate negative social and environmental impacts of the project; and, enhance project acceptance and socio-environmental sustainability. Stakeholder engagement has been divided into two phases:

- **Phase I (Project Preparation)** : The purpose of stakeholder engagement during this phase has been to: ascertain institutional needs; apprise all stakeholders about planned activities/reforms; improve project design; create synergies; and, enhance the socio-environmental sustainability of the project activities envisaged under the different project components.
- **Phase II (Project Implementation)**: Extensive stakeholder engagement will be carried out during this phase with PAPs, disadvantaged/vulnerable groups and other interested parties. Section 4.3. provides an exhaustive list of topics for stakeholder engagement during this phase along with the corresponding tools and techniques for conducting them. These will be further refined during project implementation and the finalised engagement topics, methods and frequencies will be presented in the revised SEP within 90 days of project effectiveness.

4.2. Proposed Strategy for Information Disclosure²²

Based on consultations with the implementing agency and following World Bank disclosure protocol, the following table provides an initial outline of the information to be disclosed at the preparation and implementation stages.

Project stage/ Components	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Preparation	MoE-PD, HESCO, MEPCO, PESCO, affected parties, interested groups, public at large, vulnerable groups, Government entities	<ul style="list-style-type: none"> • Project Documents, • Appraisal stage ESCP and ESRS • E&S instruments 	<ul style="list-style-type: none"> • Websites of MoE-PD, HESCO, MEPCO and PESCO before project effectiveness • Print and electronic media • One-on-one meetings, • Consultation meetings
Implementation	MoE-PD, HESCO, MEPCO, PESCO and other relevant Government ministries (Agriculture, irrigation, forestry, Labor, Revenue) and relevant public. Agencies (Provincial EPAs)	<ul style="list-style-type: none"> • PAD, E&S principles and obligations, ESCP • Consultation process/SEP, • ESIA • E&S instruments, • GRM procedures and project information 	<ul style="list-style-type: none"> • Websites of MoE-PD, HESCO, MEPCO and PESCO • One-on-one meetings • Consultation meetings
	Local communities (Communities around sub project areas) and Vulnerable groups (including local labor, disabled people, minorities and women)	<ul style="list-style-type: none"> • Regular updates on project activities and specific interventions for vulnerable groups • SEP and GRM procedures. • Consultations on E&S instruments 	<ul style="list-style-type: none"> • Outreach through local community organizations • Public notices • Press releases in the local media and on the project website • Mobile loudspeakers, announcements in local mosques and communities in local languages • Dissemination of information through social media
	International donor agencies	<ul style="list-style-type: none"> • Scope of Project, opportunities for collaboration • regular updates on project progress • ESMP, • Updated SEP and its implementation 	<ul style="list-style-type: none"> • Bi Annual Consultative sessions with agencies to create synergies in the work undertaken and avoid duplication of efforts • Monthly updates through emails • Interagency forums and virtual meetings.

²² The proposed meetings will be held once social distancing measures are eased or SOPs are available.

Project stage/ Components	Target stakeholders	List of information to be disclosed	Methods and timing proposed
	NGOs, Media representatives Academia	<ul style="list-style-type: none"> • Scope of Project, , opportunities for collaboration • ESMP, • Updated SEP and GRM procedures. 	<ul style="list-style-type: none"> • HESCO, MEPCO and PESCO websites • Bi-Annual Project Dissemination Workshops
	General public	<ul style="list-style-type: none"> • FAQs, • Updated SEP and GRM procedures 	<ul style="list-style-type: none"> • HESCO, MEPCO and PESCO websites • SMS • Mosque announcements in rural areas • Local influentials (councilors, community workers etc.)

For the implementation stage, detailed consultations will suggest the modes of communication and frequency of future engagements, suitable for each type of stakeholder. The information per target stakeholder will be provided during the update of this SEP to be carried out within a month of the project effectiveness date.

4.3. Proposed strategy for consultations

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
Preparation	<ul style="list-style-type: none"> • Need of the project • Planned activities • E&S principles, risk and impact, management/ ESMF • Grievance Redress mechanisms (GRM) 	<ul style="list-style-type: none"> • Virtual meetings providing background information • Phone • Emails • Appropriate adjustments were made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, WebEx, Microsoft Meetings, SMS, emails, etc.) 	Officials from MoE-PD, HESCO, MEPCO and PESCO	E&S Staff and focal points designated at MoE-PD, HESCO, MEPCO and PESCO

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
	<ul style="list-style-type: none"> Proposed project components Environmental and Social Risks and any other concerns stakeholders may have 	<ul style="list-style-type: none"> Phone Emails Individual meetings in person and virtually Virtual Consultative workshops providing background information and discussing environmental and social risks Appropriate adjustments were made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, WebEx, Microsoft Meetings, SMS, emails, etc.) 	<ul style="list-style-type: none"> Relevant Government departments and organizations Academia NGOs' working in communities 	E&S Staff and focal points designated at MoE-PD, HESCO, MEPCO and PESCO
Implementation	<ul style="list-style-type: none"> Project progress on ongoing activities/targets and outputs ESIA Preparation of E&S Plans based on frameworks Updated SEP & its implementation GRM Processes Occupational Health and safety concerns Environmental and social concerns Monitoring and Evaluation Plan 	<ul style="list-style-type: none"> Review of Project progress Reports Emails Meetings Electronic publications as well as dissemination of hard copies of E&S Frameworks ESMP monitoring reports and reviews Gender Assessment GRM Reports Updated SEP 	Officials from HESCO, MEPCO and PESCO	<p>Safety Department- OHS Concerns</p> <p>GRM Focal Points on GRM issues</p> <p>E&S Staff at HESCO, MEPCO and PESCO – Project progress, implementation of the ESMP and the SEP, and E&S concerns</p>

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
	<ul style="list-style-type: none"> • Project ongoing and planned activities • Implementation of ESMPs, RPs • Updated SEP & its implementation • GRM for public • Environmental and social concerns 	<ul style="list-style-type: none"> • Information resource portal on the DISCOs website with district data pertaining to project activities and GRM information • Social media platforms(e.g. Facebook and twitter) of the DISCOs • Outreach programs on radio and state-run television where the public can call-in 	<ul style="list-style-type: none"> • General public, • Project area Beneficiaries 	<p>Safety Department at HESCO, MEPCO and PESCO -OHS Concerns</p> <p>GRM Focal Points at HESCO, MEPCO and PESCO- GRM Procedures</p> <p>E&S Staff at HESCO, MEPCO and PESCO – Project progress, implementation of the ESMP and the SEP, and E&S concerns</p>
	<ul style="list-style-type: none"> • Project progress on activities. • Opportunities for collaboration • E&S Instruments • Updated SEP & its implementation • GRM Procedures • Health and safety concerns • Environmental and social concerns 	<ul style="list-style-type: none"> • Bi Annual Provincial consultative meetings • Review of Project progress Reports • Information resource portal on the DISCOs website with district data pertaining to project activities and GRM information • Print, electronic and social media 	<ul style="list-style-type: none"> • Other ministries and public bodies, • Universities and research organizations • Print and Electronic Media, • NGOs and CSOs in each province/area • International Organizations such as ILO, ADB etc. 	<p>Safety Department at HESCO, MEPCO and PESCO -OHS Concerns</p> <p>GRM Focal Points at HESCO, MEPCO and PESCO- GRM Procedures</p> <p>E&S Staff at HESCO, MEPCO and PESCO – Project progress, implementation of the ESMP and the SEP, and E&S concerns</p>

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
	<ul style="list-style-type: none"> Information on safety and prevention measures ESMP Updated SEP and its implementation GRM Procedures Environmental and social concerns 	<ul style="list-style-type: none"> Community meetings in disadvantaged/ vulnerable areas through local CSOs Project Brochures, posters 	<ul style="list-style-type: none"> Affected individuals and their families Local communities Vulnerable groups 	<p>Safety Department at HESCO, MEPCO and PESCO -OHS Concerns</p> <p>GRM Focal Points at HESCO, MEPCO and PESCO- GRM Procedures</p> <p>E&S Staff at HESCO, MEPCO and PESCO – Project progress, implementation of the ESMP and the SEP, and E&S concerns</p>
	<ul style="list-style-type: none"> Information on implementation of NEP through the project Policy level environmental and social considerations, capacity and scope of work 	<ul style="list-style-type: none"> High level Meetings 	<ul style="list-style-type: none"> Policy makers and influencers 	<p>Focal point at the MoE-PD</p>

The frequency for consultations and reporting during the implementation stage will be determined within 90 days of the project effectiveness date.

4.4. Proposed Strategy to incorporate the view of vulnerable groups

Consultations will be carried out with representatives of disabled citizens, women, minorities and communities near or in the vicinity of grid stations using FGD as a tool. Engagement mechanisms and frequencies, will accordingly be designed and customized for vulnerable people. This will continue throughout the Project life. A few such consultations have been held with communities in grid stations in the preparation phase, which will continue in the inception (first six months) phase of the project. These have been discussed in section 3.3 and detailed consultation notes are attached at annex 3

4.5. Timelines

The frequency of stakeholder engagement will vary across the Project activities (quarterly, bi-annual or annual), depending on the nature/pace of activity design/implementation, its social and environmental risk and impact and its relevance to the stakeholders. As consultations are held with

stakeholders these timelines will be ascertained accordingly when the SEP is reviewed and updated following project effectiveness.

The project will review its stakeholder engagement against the SEP bi-annually, and this review will be a part of the progress report that will be shared with the client management and the World Bank.

4.6. Review of Comments

All stakeholder engagement activities (FGDs, KIIs and consultations) will be recorded and transcribed. Comments provided by stakeholders will be collated and reviewed following each engagement activity. These comments will be analyzed and formulated into a report which will be shared with the relevant DISCO for further action.

4.7. Future Phases of the Project

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism which will be conducted biannually.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources (estimated cost: USD\$100,000)

Implementation of all ESF instruments including the SEP will be financed from the project budget. An estimated budget will be provided in an updated SEP at the start of program implementation. Based on prior experience in similar engagement and awareness campaigns undertaken by the GoP, the budget for the SEP is proposed to be approximately USD\$100,000 annually. The detailed costs will be calculated once the activity plans for the project components are developed.

5.2. Management Functions and Responsibilities

For components 1, 2 and 3 of EDEIP, three IAs are engaged under EDEIP to ensure supply of electricity in new areas, load reduction on presently overloaded grid stations and transmission lines, and improvement in the voltage profile as well as the system reliability. Under the Project, IAs will establish new grid stations, extension / conversion / augmentation of existing grid stations and laying of new transmission lines.

- HESCO is providing electricity to the 13 districts of Sindh Province.
- MEPCO, which distributes electricity in the 13 Southern districts of the Punjab Province.
- PESCO is responsible for electricity distribution in the entire KP Province

Project Management Unit (PMU)

Each Implementing agency will be responsible for the overall management, supervision, and execution of the project through the Project Management Unit (PMU). The PMU has established four sections under Chief Engineer (Development): Planning, Scheduling & Coordination (PS&C); Procurement; Finance; and Environmental and Social (E&S) management. EDEIP will also be implemented by these

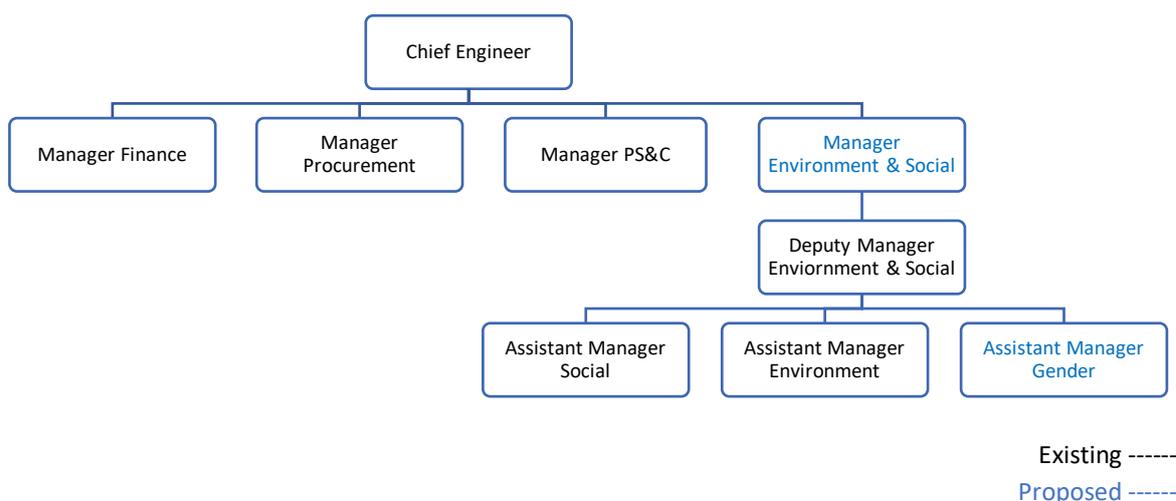
PMUs. PMUs will be supported by the Project Implementation and Management Support Consultants (PIMSC) and other individual advisors and experts as may be required.

The overall responsibility of E&S performance, including SEP implementation, will rest with the Project Director (Chief Engineer Development).

Environmental and Social Cell (ESC)

Within the PMU, under the Chief Engineer, Development, IAs have already established their respective Environmental and Social Cells (ESSC) to manage the E&S related activities. This Cell is headed by a Deputy Manager, and assisted by two Assistant Managers, Environment and Social Development, respectively with relevant qualifications and experience; the strength can be increased in the future as required. Under the proposed institutional arrangements, a gender specialist will also be required to be part of each ESSC Team. The implementation and updating of the SEP through the life of the project will be the responsibility of the Assistant Manager- Social under the supervision of the Deputy Manager. In case there is 1 Assistant Manager in the PMU, that person will be responsible for implementing the SEP. The existing and proposed organizational procedures for E&S management are illustrated below.

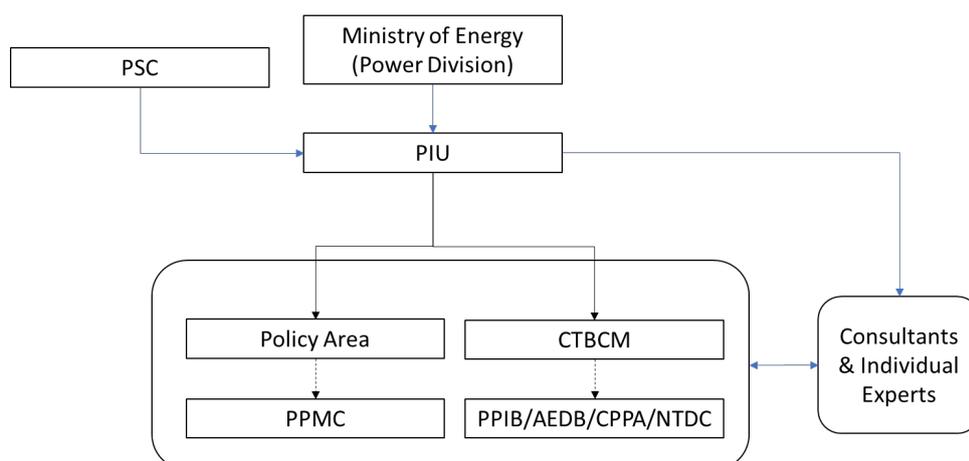
Figure 3: Existing and Proposed Institutional Arrangements under PMU for DISCOs



For Component 4 of EDEIP, MoE-PD will be the implementing entity and principal accounting authority. A Joint Secretary will serve as a project director of the PIU and will be supported by budget officer(s) from within the Power Division to oversee financial management aspects. It will oversee execution of planned activities and will collaborate with relevant entities as described in Figure 3 above for their effective execution.

On the policy aspect, Power Planning and Monitoring Company (PPMC) will support MoE-PD, whereas PPIB/AEDB will be responsible to carry out the work related to the IAA. The setting up of the ISMO will involve NTDC and CPPA-G, who is currently serving the role of the market operator.

Figure 4: Organogram for PIU in MoE-PD



A Project Steering Committee (PSC) is proposed to provide high-level oversight, strategic guidance and facilitate coordination between relevant entities and departments for smooth implementation of Component 4 of EDEIP in particular and overall project implementation in general. PSC would be chaired by Secretary Energy with Member Energy Planning Commission, CEOs of PITC, DISCOs and PPMC and representatives of NEPRA and Privatization Commission as its members. The PSC composition is fit for the purpose and other members can be coopted on a need basis. The PD of PIU in MOE-PD will be secretary to the PSC. MoE-PD will designate a focal point on E&S aspects.

The current focal points in the respective DISCOs who are responsible for implementing the SEP are listed below:

1. Deputy Manager (Environment & Social) PMU, HESCO
Cell #: 92 3337071418, Email: cedevhesco@gmail.com
2. Deputy Manager (Environment and Social), PMU, MEPCO
Cell # 923028266373, Email: arifsoc@gmail.com
3. Deputy Manager ((Environment & Social) PMU, PESCO
Cell #: 92. 3468008956, Email: pmupesco@gmail.com

The MoE-PD will also nominate a focal point on E&S to ensure that these considerations are being met as outlined in the E&S management instruments of the project.

6. Grievance Mechanism

The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects.
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants.

6.1. Description of GRM

The project will strengthen the existing Grievance Redress Mechanism (GRM) being used by the Discos to address the concerns and grievances of project affected persons and other stakeholders. This mechanism will receive and facilitate resolution of the concerns or grievance of people who believe they are adversely affected by the Project or the people who believe that their interest are at risk due to the Project including construction and operations activities. All three DISCOs have notified Grievance redress committees. A representative from the community is also included in this committee. However, for the most part complaints are addressed at the field level where a site register is maintained. However, a systematic approach is not always followed and ensuring that a multi-tiered GRM is followed would further improve the existing system. For complaints at the community level, a phone number and site register provide appropriate methods for registering complaints. There is also provision for protection of complainants from retaliation and the right to remain anonymous, if requested, to receive and facilitate resolution of the AP's concerns and grievances regarding the project's social, and environment performance.

6.2. Project Level GRM

EDEIP is proposing that a robust GRM be established to ensure that stakeholders across the board are able to avail to a simple, accessible and effective platform for having their complaints addressed and resolved.

Each IA will establish a GRM to address grievance and complaints related to EDEIP. The Project level Grievance Redress Mechanism (GRM) will be set up for all subprojects under EDEIP to address grievances arising from social, land acquisition and resettlement (LAR) and environmental impacts. This section determines the structure, roles and functions of the GRM, through which grievances can be addressed in each subproject. These will be further specified in each subproject E&S management instrument.

Aims and Objectives of GRM

The GRM in each DISCO will aim to investigate grievances received from the APs and other stakeholders and provide a timely, transparent and fair resolution to voice and resolve environmental and social concerns and grievances linked to the project. The specific objectives of the GRM are to:

- Provide an avenue to APs and other stakeholders the opportunity to raise concerns, complaints and grievances with a clear process using several uptake channels, locations and modes;
- Facilitate and arrive at mutually agreed solutions satisfactory to both the Project and the APs, and to resolve any grievances locally, in consultation with the aggrieved parties;
- Help in the smooth implementation of the E&S management measures and, particularly to cut down on lengthy litigation processes and prevent delays in project implementation; and

- Ensure that concerns and grievances are handled in a fair and transparent manner, in line with provincial laws and regulations, and WB's applicable standards.

6.3. Nature of Complaints to be redressed

Problems to be addressed by a GRM during the planning or implementation of subproject E&S management instruments can be complaints about (i) project alignment and requests to avoid specific affected assets, (ii) omission of impacts and some APs in a census, (iii) impact assessment and valuation of losses, (iv) disbursement of compensation relative to entitlements stipulated in a RP, (v) disputes about ownership of affected assets apportionment of compensation with payment delay issues, (vii) delays in payment of relocation and rehabilitation costs and design and completion of relocation sites/facilities, (viii) the adequacy and appropriateness of income restoration measures. (ix) any concerns related to environmental issues during construction like generation of dust, noise, blockage of access and occupational and community health and safety issues. Actions will be ensured to make the GRM accessible to vulnerable persons, including the poor, elderly, handicapped, female heads of households, as well as women and minorities in general. Each sub-project E&S management instrument will indicate specific mechanisms to ensure accessibility for specific groups of APs.

Structure of GRM for DISCOs

In each DISCO, the GRM will be set up with a three-tiered structure; at local, PMU and DISCO levels enabling immediate local responses to grievances and higher-level review addressing more difficult cases not resolved at the local level. To ensure that all geographic reaches and relevant administrative units involved in the project are covered, the GRM will set up (i) a local mechanism in each affected village/community with grievance redress focal points; (ii) a grievance redress committee (GRC) at PMU level, as applicable and useful and (iii) a tier at DISCO level.

In accordance with the above, an adequate GRM will be available for APs having grievances regarding any decision, practice or activity arising from land or asset assessment, acquisition, compensation, resettlement or rehabilitation, environmental and occupational and community health and safety issues or related matters. For issues related to LARR, APs will be fully informed of their rights under the statutes, i.e., Land Acquisition Act 1894, and World Bank standards on Involuntary Resettlement and of the procedures for addressing complaints whether verbally or in writing during disclosure of LAA notifications and other LAR information including summary of draft RPs, consultations throughout RP preparation and implementation, surveys, and at the time of compensation.

Care will always be taken to prevent grievances rather than going through a redress process. This can be done through careful sub-project design and implementation related to environment and resettlement issues, by ensuring full participation and consultation with the APs, and by establishing extensive communication and coordination between the community, the PMU, the LAC and concerned departments in general. For this purpose, the PMU will ensure timely establishment of multi-tiered grievance redress system at village level, Project level and DISCO level.

A three-tier GRM will provide a time-bound, early, transparent and fair resolution for APs' and other stakeholders' grievances regarding E&S management of each subproject. All complaints received verbally or in writing will be properly documented and recorded in the Complaint Management

Register(s). In addition, an easy-to-access web-based system will be developed to receive the complaints. If the complaint cannot be resolved at these three tiers, the complaint will have a choice to lodge his/her complaint at the related court of law. GRM will not, at any stage, bar access of APs to the court of law. The GRM for the project is outlined below.

- i. **First Tier of GRM.** The first tier of GRM will be established at the field level and will offer the fastest and most accessible mechanism for resolution of grievances at the local level. ESU will facilitate formation of APCs in each village/settlement and publicize GRM. Local level Grievance Redress will be led by the ESU Manager, with inputs and support from Land Acquisition Collector (LAC) and other relevant staff of Revenue Department (when resettlement activities are in progress), contractors' representatives, consultants' representatives, representatives of other relevant departments, and members from the APC. At this tier, the designated E&S staff of PMU site office will make attempt to resolve the complaints within two to 10 working days, depending on the nature of grievance. The ESU Manager will share the proceedings informally to reach an amicable settlement between the parties within 10 days of receiving a complaint (verbally or in writing) from an affected person or his/her representative. The proceeding will be recorded in writing, and copies will be provided to the parties involved. Grievances will be documented with personal details (name, address, date of complaint, and nature of the complaint) will be included unless anonymity is requested. A tracking number will be assigned to each complaint/grievance. Should the grievance remain unresolved or the AP is not satisfied with the decision, the grievance can be lodged with the project level grievance redress committee, led by the head of PMU.
- ii. **Second Tier of GRM.** The E&S staff in PMU will refer the unresolved issues or grievances (with written documentation) to the second tier of GRM, the PMU level GRC. The PMU level GRC will be established by each DISCO and will consist of the following persons: (i) the head of PMU will act as head of the GRC; (ii) a representative from DISCO senior management; (iii) Manager/Deputy Manager of ESU; (iv) representative of DC office (where relevant); (v) representative of PIC/CSC; (vi) Chief Resident Engineer of the CSC (on-call); (vii) representative of relevant government offices (on-call); and (viii) two to three representatives of APC (on-call). A hearing can be called with the GRC, if necessary, where the AP(s) can present details of his/her/their concern/grievance. The GRC will meet as necessary when there are grievances to be addressed but not less than on quarterly basis. The GRC will suggest corrective measures at the field level and assign clear responsibilities for implementing its decision within 25 working days, depending on the nature of the grievance.
- iii. **Third Tier of GRM:** In the event that a grievance cannot be resolved directly by the second tier GRC or if complainant is dissatisfied with the decision of GRC, the affected people can seek alternative redress through the CEO or Board of Directors of DISCOs, district administration, the Secretary Energy and Power Department or higher-level administrative authorities, the Pakistan Citizen Portal or the court of law, as appropriate.

The process is illustrated below.



Structure of GRM for MoE-PD

For general complaints MoE-PD has a complaint cell and provides an online option to file available on its website: <http://www.mowp.gov.pk/frmDetails.aspx>. The E&S focal point in MoE-PD will also manage the complaint mechanism under EDEIP at MoE-PD level.

Further, the Pakistan Citizens Portal will also be used to file a grievance in instances where the public is not aware of an alternate grievance recourse mechanism. Headed by the Prime Minister's Performance Delivery Unit (PMDU), Pakistan Citizen's Portal is an online integrated GRM which connects all government organizations at the federal and provincial level through a mobile application. Available on both Android and iOS, PCP is used for lodging complaints against any government department or functionary, seeking guidance/information regarding government procedures and to provide suggestions to the government for the resolution of any issue pertaining to the interest of the general public. User Guidelines Manual for PCP is available in both Urdu and English. As of 1 November 2021, the PCP had 3019275 million registered users in the country. A total of 281,4630 complaints were registered and 2664254 complaints have been resolved. Despite being a robust GRM, PCP's utility to the project's disadvantaged and vulnerable stakeholders is limited due to low female coverage and because of it being a mobile app-based platform which cannot be accessed by persons with no access to mobile phones, with low ICT literacy, or those living in areas with no network connectivity.

Under EDEIP, the GRM process will commence with public communication i.e. when citizens will be informed about existing mechanisms where they can register their grievances. Methods of how to register grievances and expectations from the process will also be communicated. Information dissemination about the GRM process will be undertaken through various means. These means include but are not restricted to:

- Leaflets, brochures posters and printed material available at the respective DISCO offices (head office and district offices) and to be distributed during consultation sessions, as well as through face to face communication in the early implementation phase
- Social media such as Facebook;
- Websites of MoE-PD, HESCO, MEPCO and PESCO

The accessibility of the GRM to lesser-educated and disabled citizens needs to be ensured. It needs to be widely circulated via dedicated media campaigns using print, electronic, and social media, so that citizens and organizations in the project areas are aware of this facility and can avail it for addressing their issues and complaints. Details on response and frequency of communication with the complainant, complaint handling time and resolution process will be provided in the updated SEP to be prepared 90 days from the project effectiveness date.

As detailed in the project LMP, a GRM will have provisions for confidentially receiving grievances related to SEA/SH. Further details of the GRM will be provided in the SEA/SH Risk Mitigation Action

Plan which will be developed for EDEIP as a part of E&S management plans to be prepared during implementation. All SEA/SH related complaints, with the survivor's consent, will be referenced to the project identified service provider who will further manage the case in a survivor centric approach and will report back to the project GBV GRM once the case is solved.

Grievance Records and Documentation

Each IA will nominate a GRM Focal Point to manage a grievance database to keep a record of all grievances received. The database will contain the name of the individual or organization lodging a grievance; the date and nature of the grievance; any follow-up actions taken; the solutions and corrective actions implemented by HESCO or other relevant party; the final result; and how and when this decision was communicated to the complainant.

Monitoring and Review

It is critical to monitor the effectiveness of the comment response and, grievance mechanism. Appropriate measures/KPIs for this include monthly reporting on the number of grievances received, resolved and outstanding. This will be undertaken by the GRM focal point. As part of the annual review/report, analyzing the trends and time taken for grievance resolution will help to evaluate the efficacy of the comment response and, grievance mechanism. As part of stakeholder engagement and consultation, involving the views of the stakeholders for whom the Comment Response and, Grievance Mechanism is designed in this monitoring and review, will help to improve effectiveness and stakeholder buy-in.

7. Monitoring and Reporting

7.1. Involvement of stakeholders in monitoring activities

A monitoring and evaluation plan to ensure transparency and accountability will be concomitantly strengthened and updated on an ongoing basis, with national and provincial partners to monitor the implementation process of the SEP based on the performance indicators for the project.

7.2. Reporting back to stakeholder groups

It is critical to follow-up with stakeholders at different stages of the project cycle. Once consultations have taken place, stakeholders will want to know which of their suggestions will be used, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, project impacts are being monitored.

Often the same methods used in information disclosure are applied to reporting back to stakeholders. This follow up can include large-scale forums, brochures, targeted meetings, and consultative committees. Given the current context and the need for social distancing, alternate means such as short message service (SMS), radio, television, social media handles, websites of HESCO, MEPCO and PESCO will also be employed to share updated information with stakeholders.

The SEP will be periodically revised and updated bi-annually during the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will provide a mechanism

for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

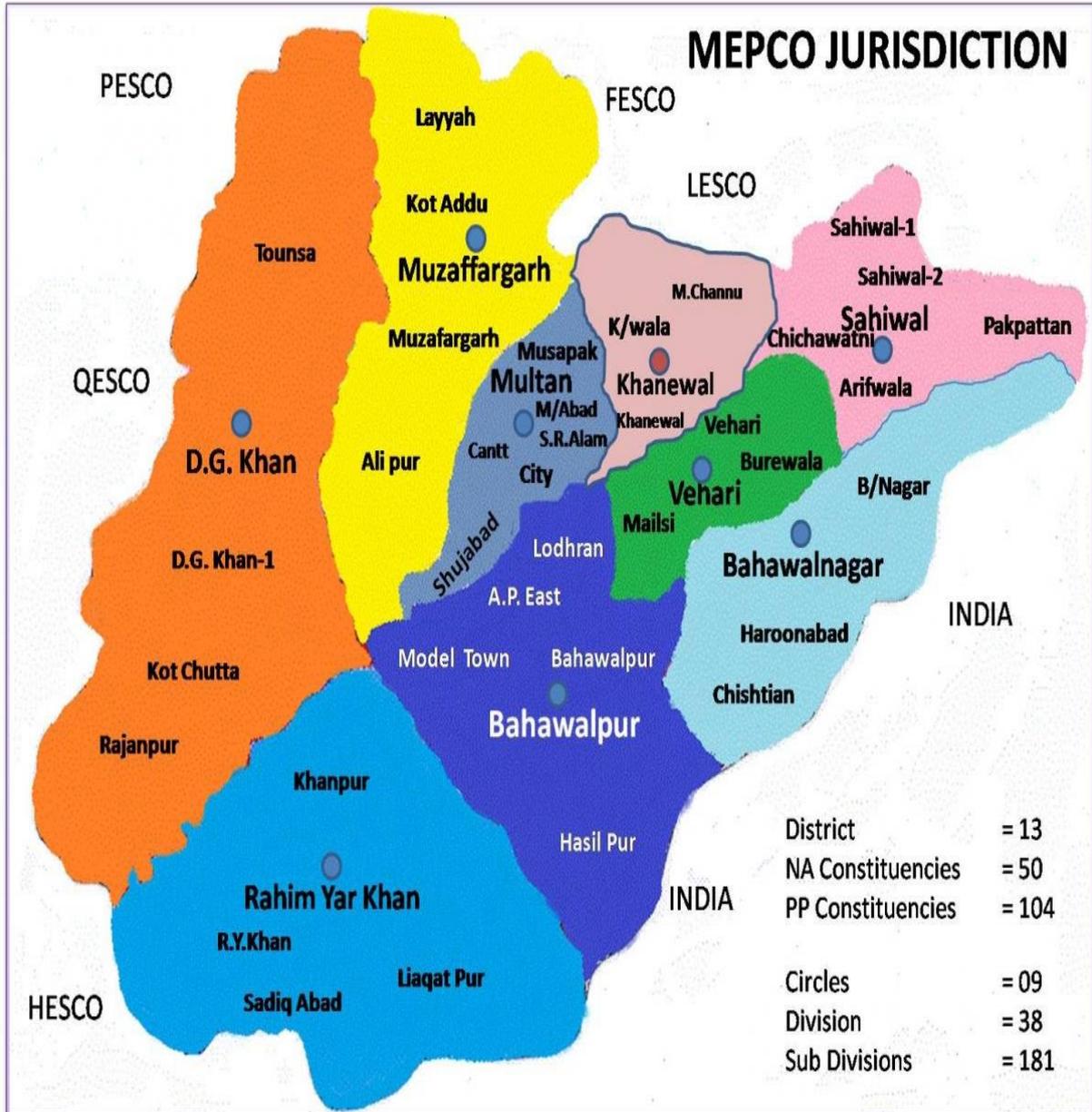
- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis. Based on the data collected regularly, these indicators are:
 - Number of consultation meetings (virtual) and other public discussions/forums conducted monthly, quarterly, and annually;
 - Frequency of public engagement activities;
 - Number of public grievances received (monthly, quarterly, and annually) and number of those resolved within the prescribed timeline.

Annex 1: Project Area Maps

Map of HESCO Coverage Area



Map of MEPCO Coverage Area



Map of PESCO Coverage Area



Annex 2 List of Documents Consulted

1. Concept Environmental and Social Review Summary (ESRS Concept Stage) Date Prepared/Updated: 05/06/2020 | Report No: ESRSC01159
2. Template for ESS10: Stakeholder Engagement Plan for Projects in Response to COVID-19
3. Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings
4. The GRM Template available at <http://pubdocs.worldbank.org/en/909361530209278896/ESF-Template-ESS10-SEP-June-2018.pdf>
5. The GRM Checklist available at (<http://pubdocs.worldbank.org/en/354161530209334228/ESF-Checklist-ESS10-GRM-June-2018.pdf>)
6. Guidance Note on ESS10 for Borrowers available at: <http://pubdocs.worldbank.org/en/476161530217390609/ESF-GN10-June-2018.pdf>
7. Draft Project Appraisal Document for EDEIP Report No: PAD4172

Annex 3: Synopsis of Individual Stakeholder Consultations by DISCOs

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
HESCO Employees	<ul style="list-style-type: none"> • Implementation of occupational procedures is problematic • Maintenance of safety equipment needs to be ensured. • Crop damage should be paid at the district rate. • Need cranes at the division level and bucket excavators • Enhance technical monitoring which will lead to increase in efficiency 	The employees' suggestions will be communicated to the management.	7.9.2020 HESCO
HESCO Women Employees	<ul style="list-style-type: none"> • Need to have a day care centre on site • Also a separate washroom as the existing one was converted into a store. • A common room for offering prayers was also mentioned. • Professional training and refreshers should be offered to employees. 	The employees' suggestions will be communicated to the management.	14.9.2020 HESCO
132 KV Pabbi Grid Station Staff and Community around the Grid Station (Augmentation work)	<p>The staff of the GSS stated that, the shifting of heavy equipment to the yard damage drain culverts and flower pots, and after completion of work the contractors do not restore the site properly.</p> <p>Community Consultation: The GSS Pabbi is located on the Main Cherat road District Nowshehra, the surrounding area of the GSS is agriculture land, and on the main road there are commercial shops, during consultation the locals of the area appreciated the proposed package, as there are no high loss feeders. Further the community members added that, the area is in the infancy stage of development attracting huge population migration to the area (establishment of University of Engineering and Technology at Jalozi on</p>	The contractor is bound to restore the work site to its original condition.	24.2.2021 - PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	the main Cherat road, PHA Jalozi housing society, and other private housing societies) also the famous Cherat cement factory is operating in the GSS catchment area.		
132 KV Jehangira Grid Station Staff and Community around the Grid Station (Augmentation work)	<p>On the subject of the impact of development and maintenance works on people residing within the vicinity of the Grid station, the staff of the GSS argued that, no such issues have been faced in the past, however, there is an issue with transportation of heavy equipment to the yard. The shifting of heavy equipment to yard has damaged their access route to colony not restored after completion of work. There is sufficient space for landscaping at the GSS, the soil is fertile for the cultivation of citrus and Guava fruit species, as in past the GSS had a well-established orchard, but as the tube well of GSS went out of commission the orchards vanished</p> <p>Community Consultation: The GSS Jehangira is located 01 KM on right side of the Main G.T.Road District Nowshehra, the surrounding area of the GSS is open grounds and opposite to the GSS there is Tobacco Warehouse</p> <p>Community members consulted including scrap warehouse team, blacksmiths and general public. The locals appreciated the proposed package. As there is no high loss feeders emanating from Grid, the 4 hours load shedding in the area is due to overloading, if the proposed package executed well in time the existing load shedding issue will be addressed. Over all the community is very cooperative, the only issue raised by the community members as well as GSS staff is the blockage of road during the carriage of Power Transformer to the GSS, but they also elaborated that this task is manageable, the temporary blockage is due to encroachment, and traffic police</p>	The community's concern is noted and the road will be restored. Heavy equipment will be transported preferably during the night to minimize disruption and nuisance to the community.	24/2/2021- PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	timely intervention ensures traffic flow takes place as per normal.		
132 KV Timergara Grid Station Staff and Community around the Grid Station (Augmentation work)	<p>During construction/ maintenance within the Grid Station the GSS staff revealed that, only they are affected due to a foreign working party while using their limited resources such as wash rooms, drinking water and tap water etc. Further only mob attacks are feared due to prolonged power outages as a result of system constraints. If augmentation work is completed on time it will address this issue.</p> <p>Community Consultation: In front of the GSS, the land is commercial comprised of Marble factories, Ice factories, service stations, Fuel stations, Commercial plazas and markets, during consultation the owners of the facilities on disclosures of the proposed EDEIP Program unveiled that, it is good and admirable initiatives, as all the operations related to commercial activities are electricity based, and actually the existing development in the area is because of the construction of the existing GSS. Further augmentation will add value to the existing operating units and will support and contribute to the future demand of expansion in the commercialization.</p> <p>During consultation the domestic consumers added that, the gradual developmental activities in the GSS addressed our low voltage issue, as in past we were using regulators, UPS etc. for running our home appliances which was an additional cost on our income, so up gradation work has resolved this long outstanding issue. This augmentation work will support the present as well as future domestic demand and long hours power outage issue will be addressed.</p>	The project will prefer to hire local labor to avoid congestion due to migrant workers in the camp sites.	25.1.2021 - PESCO
132 KV Tangi Grid Station Staff and Community around the Grid	The GSS workers mentioned that they did not experience any impact from the foreign working gang in the GSS. The only issue they have faced is mob attacks,	Noted	27.1.2021- PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
Station (Augmentation work)	<p>particularly in the summer season due to high loss feeders with 16 -19 hours load shedding.</p> <p>Community consultation: In front of GSS there is private health facilities including private hospitals, labs, pharmacies, and Government Tehsil Hospital. The expansion in the health facilities took place due to the construction of the existing Grid station, they were asked whether they are being affected from GSS maintenance or construction work such as damages to their infrastructure, traffic flow etc., they responded no such issues observed, rather they appreciated the up-gradation work and the same will support their health facilities for providing best health services to the patients and general public in form of uninterrupted power supply</p>		
<p>Urmer Feeder SUB Division Name: Rehman Baba</p> <p>Mirza dher and Sherpao Feeders, Umerzai</p> <p>Akhune Abad Feeder, Rasheed Garhi</p> <p>Tangi Mira and Abazai Feeders</p>	<p>Regarding the safety of staff and general public, the respondents said that PPEs are provided to them, they also added that before commencement of work on lines the influentials of the area are taken into confidence to avoid any public nuisance.</p> <p>Feedback from PESCO Consumers (General public): During consultation the general public particularly, the paying consumers highly appreciated the proposed scheme as they are facing more than 18 hours load shedding in the area. They also hoped that it also addresses the issues of overbilling due to hooks and electricity theft. As the consultation took place with diversified group of peoples, so many of them especially commercial consumer added that bare conductor had caused short circuit in the markets and burned their valuable assets and shops, and affected their livelihood.</p>	<p>The PESCO Staff were specifically asked about ABC cables and listed the following benefits of using ABC cables:</p> <ul style="list-style-type: none"> • ABC cable will eliminate fatal and non-fatal incidents • it will also eliminate the damages to distribution transformers caused by hooks, • The insulated cable will restore aesthetic beauty of the area • , It will address issues of short circuits • The cable on one hand will reduce the maintenance cost for PESCO and on other hand will eliminate cost on general public for shifting of these lines during 	<p>28/01.2021- PESCO</p> <p>27/01/2021- PESCO</p> <p>28/01/2021- PESCO</p> <p>27/01/2021- PESCO</p>

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
		<p>construction of their houses etc.</p> <ul style="list-style-type: none"> • Further, during raids when the culprits are caught red handed, it led to a conflict due to stigmatization in society, so the proposed project will strengthen the weakened ties between PESCO and general public. 	
<p>132 KV Nowshehra City Grid Station Staff and Community around the Grid Station (Augmentation work)</p>	<p>The staff of the GSS stated that, they have not faced issues with regard to construction/maintenance within the grid station, transportation of heavy equipment or in the context of site restoration after working gangs complete their tasks. However, there is dense vegetation growth (eucalyptus tree species) and the lines are passing through these canopies, during summer season the sparking from the transmission line causes fire incidents which are coped with through a fire brigade.</p> <p>In front of the GSS the land is commercial comprised of Marble factories, Army Formations, Government Technical College etc. The locals of the area appreciated the proposed augmentation work in the GSS, as in summer residents of the area facing forced loading shedding, further the community representatives were asked whether community members are affecting from transportation of heavy equipment to the GSS or during any developmental or maintenance activities, they responded that, no such impact has been observed as the Grid Station is located on the a main G.T Road and the GSS has its own access from the main road without</p>	<p>Trees and their branches will be cut which are falling on the transmission line. This is one of the suggested safety measures already provided in the LMP.</p>	<p>2/02/2021- PESCO</p>

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	compromising the existing infrastructure of the area.		
132 KV Jalala Grid Station Staff and Community around the Grid Station (Augmentation work)	<p>The staff of the GSS mentioned that, they have not faced issues with regard to construction/maintenance within the grid station, transportation of heavy equipment or in the context of site restoration after working gangs complete their tasks.</p> <p>However, there is dense vegetation growth (eucalyptus tree species) and the lines are passing through these canopies. During the summer the sparking from transmission line causes fire incidents which are addressed by fire brigades</p> <p>The GSS Jalala is located on the main N-45 road, the both sides of the road occupied by hotels, and fish huts, , during consultation the locals of the area appreciated the proposed augmentation work in the GSS, as in summer residents of the area facing forced loading shedding, further the community representatives were asked whether community members are affecting from transportation of heavy equipment to the GSS or during any developmental or maintenance activities, they responded that, no such impact have been observed, the issue raised by the community is overbilling.</p>	Please see above.	2/02/2021- PESCO
132 KV Mardan II (Garhi Kapora) Grid Station Staff and Community around the Grid Station (Augmentation work)	<p>The staff mentioned that there was an issue with transportation of heavy equipment to the Yard, as the main gate access is narrow enough, the GSS in-charge added that, if the main gate is long-drawn-out to security guard room this issue will be addressed, Presently the shifting of heavy equipment to the yard has damaged their access route to colony and the main control room was not restored after completion of work.</p> <p>Community consultation: The GSS Mardan II is located in the Main Village Garhi Kapora District Mardan, the surrounding area of the GSS is</p>	The in charge of the GSS responded that overloading of Power Transformer is causing long outages, which are badly disturbing routine orders from customers.	9/02/2021- PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>commercial land (Markets, show rooms, carpenter display centers). During consultation the blacksmith revealed that, their work is dependent on uninterrupted power supply, during summer season they are facing acute problem of power outages for long hours, On disclosure of the proposed package the respondent appreciated and hoped that, they will get relief in the near future.</p>		
<p>132 KV Warsak Grid Station Staff and Community around the Grid Station (Augmentation work)</p>	<p>There is no residential colony within the premises of GSS, located adjacent to Warsak power house surrounded by military installations.</p> <p>During consultation the in charge of the Grid station revealed that, the only issue they are facing is site restoration after completion of maintenance or other necessary work being carried out in the GSS.</p> <p>Community Consultations: As there are different WAPDA installations feeding from the GSS, the consumers are WAPDA employees and they are well aware about the Power distribution mechanism, the catchment area of the GSS is rural and strategically most important, as the site is located at the confluence of two tribal districts (Khyber and Mohmand) separating by river Kabul, the feeding source of Warsak hydel generation plant. Upon disclosure of World Bank Proposed program for PESCO, the respondents pointed out their concerns as long outages of power supply and over billing</p>	<p>The contractor is bound to restore the work site to its original condition.</p>	<p>08/02/2021- PESCO</p>
<p>132 KV Dargai Grid Station Staff and Community around the Grid Station (Augmentation work)</p>	<p>GSS staff mentioned an issue with transportation of heavy equipment to the yard, as the access route through bridge is narrow enough for the passage of Power Transformer especially, from certain point the T/F is pulled manually and takes 15 days to the switchyard affecting the movement of the residents. As the denizens are the Wapda employees, likewise general public they are taken in confidence prior to the</p>	<p>Noted</p>	<p>9/02/2021 - PESCO</p>

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>commencement of such activities to plan their movement accordingly.</p> <p>Colony inside Grid Station: The GSS is located within the Colony of Dargai II WAPDA Power house having area of 08 kanals, commissioned in 1970. The colony comprised of 10 Nos. Bungalows, 80 Quarters, Rest house, community hall and hospital.</p> <p>The GSS Dargai is located on the service of the main N-45 road, opposite to the GSS Punjab regiment is stationed. During consultation the locals of the area appreciated the proposed augmentation work in the GSS, as in summer residents of the area observe forced loading shedding, further the community representatives were asked whether community members are affecting from transportation of heavy equipment to the GSS or during any developmental or maintenance activities, they responded that, no such impact have been observed, the GSS staff timely inform the public about such activities. Furthermore, it was mentioned that, in the said area three hydel power houses (Jabban, dargai-II and Malakand III) are operational and time to time maintenance works are carried out in the same to maintain uninterrupted power and water supply for irrigation purposes, so the residents of the catchment area are well aware about the development works and issues related thereto. The area has attracted investors, as result different steel furnace units have been established employed considerable local skilled and unskilled labors, the locals of the area argued that if the Power constraints are addressed, more investors will be encourage to establish other manufacturing units which will in turn add value to the economic boom in the area.</p>		
Reconductoring with HTLS from 220 KV Shahi Bagh to 132 KV	the Incharge of the Grid station noted that, Shahi Bagh GSS is old station in District Peshawar, considerable development has been made in the GSS	To avoid tripping, HTLS technology is being introduced under EDEIP which has considerable	21/01/2021- PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
old Shahi Bagh GSS Staff and Community around the Grid Station.	<p>Feeding area resulted in heavy demand of power supply. The existing transmission line does not having the capacity to accommodate the emerging demand of power supply and GSS is facing issues of tripping,</p> <p>In a discussion on issues pertaining to development work affecting the GSS Colony staff, the GSS staff noted that, they were not suffering from developmental works/maintenance works within the premises of the Grid station, as there is a sufficient buffer zone between switch yard and colony, also the alternate access routes exist for working staff as well as for dwellers of the quarters. Also the area where these sort of works to be carried out are properly cordoned off with the instruction that entry of irrelevant people is strictly prohibited.</p>	capacity to address the tripping/outage concerns voiced	
132 KV Rehman Baba Grid Station Staff and Community around the Grid Station (Extension work)	<p>The switchyard and control room visited both sites having sufficient space to accommodate the extension work, there is sufficient space for landscaping, safety equipment such as fire extinguishers, sand buckets etc. exist. Instruction regarding safety and GSS operation are displayed at relevant locations.</p> <p>During consultation the in charge of the Grid station revealed that, the existing 15 Nos of Feeder emanating from the GSS cannot accommodate the future load, so extension work in the GSS is inevitable.</p> <p>On issues pertaining to development work affecting the GGS Colony staff, GSS staff stated that, they were not suffering from developmental works/maintenance works within the premises of the Grid station, as there is a sufficient buffer zone between switch yard and colony, also the alternate access routes exist for working staff as well as for dweller of the quarters. Also the area where these sort of works to be carried out are properly cordoned off with the instruction that entry of irrelevant people is strictly prohibited.</p>	These issues will be considered and resolved during construction through introducing stringent mitigation measures	20/01/2021- PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>The main issue which the GSS staff is facing is the mob attack which they have experienced several times due to prolong power outages, and they hoped that if the proposed project is completed in time this issue would be addressed.</p> <p>Ccommunity Consultation: as the GSS exists on the main ring road in commercial area comprised of goods transport stations, service station vehicle, show rooms and general stores, the people being consulted were stressing on uninterrupted power supply and improved power voltage.</p>		
<p>132 KV Jamrude Grid Station Staff and Community around the Grid Station (Extension work)</p>	<p>The switchyard and control room have sufficient space to accommodate the extension work, there is sufficient space for landscaping, safety equipment such as fire extinguishers, sand buckets etc. exist. Instructions regarding safety and GSS operations are displayed at relevant locations.</p> <p>During the consultation, the officer in charge of the Grid station revealed that, the existing 35 Nos of Feeders (16 Feeders to industries, 104 Feeder for hospitals, 08 Feeders for domestic consumers and 07 Feeders for merged district) emanating from the GSS cannot accommodate the future load, so extension work in the GSS is inevitable.</p> <p>The GSS staff confirmed that they were not suffering from developmental works/maintenance works within the premises of the Grid station, as there is a sufficient buffer zone between the switch yard and the colony., Also the alternate access routes exist for working staff as well as for dweller of the quarters. Also the area where these sort of works are to be carried out are properly cordoned off with the instruction that entry of irrelevant people is strictly prohibited.</p> <p>Dust pollution is a major issue in the area as the target area is surrounded by several marble factories.</p>	<p>Response already provided above</p>	<p>20/01/2021- PESCO</p>

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>Community Consultations: 132 KV Jamrude Grid is located in the Hayatabad industrial estate, around the Grid station Mable factories are operating, consuming considerable load, marble city marble factory is visited, PESCO disclosed proposed World Bank funded project under EDEIP with the aim and objectives, Manager of the factory appreciated PESCO's endeavour to enhance the capacity of the GSS to ensure improved voltage and uninterrupted power supply. In response to a PESCO team question the representative of the factory unveiled that, whenever PESCO plan maintenance work or associated work within or outside of the GSS, on routine basis they issue notice to all those concerned about the power shutdown, accordingly the Factories Management plans their operational work. He further added that on Saturday PESCO do maintenance work, so on Saturday the factories categorizes their products and arranging in synchronized order for onward supply to market, so PESCO timely informed us through notices for shutdown so this is good mechanism. The representative further argue that, the proposed project is an admirable endeavor for improved voltage and uninterrupted power supply, and he hoped that, long hour power supply outages issue will be addressed.</p>		
<p>132 KV Haripur Grid Station Staff and Community around the Grid Station (Augmentation work)</p>	<p>The GSS Staff highlighted the main issues they are facing since a long time, namely seepage of water from the roof of control house building, poor drainage system, and lack of recreational site for dwellers of the GSS.</p> <p>The 132 KV Haripur Grid is located on the Kot Najeebullah Road approaching Main Haripur City. There is no Community infrastructure in the surrounding of the GSS.</p>	<p>CEO PESCO acknowledged the importance Environment and Social management measures, and retreated that, strictly adhere to the best available standards and promote the culture of safety while executing works, CEO PESCO discourage reactive approach and stressed on proactive approach issued Directives to XEN (Civil) to address the e issues on an urgent basis.</p>	<p>3/3/2021- PESCO</p>

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
132 KV Kohat Grid Station Staff and Community around the Grid Station (Augmentation work + Extension)	<p>The area opposite to the GSS is a commercial area. Various shop keepers were interviewed to collect their feedback. Most of the Shop keepers responded that, in the near past due to prolonged power outages their commercial activities were badly affected, now after gradual improvement in the power sector, the commercial market has expanded.</p> <p>After disclosing World Bank proposed program for improvement in the existing facility, the nearby stakeholders appreciated the endeavor. Upon being asked whether they were ready to support and help the PESCO team in the proposed project while bearing temporary impacts such as heavy vehicle movements/road blockage/ damage to infrastructure (drains, pipes, cables etc.), the community members assured their full support and noted that the improvement is for their bright future.</p>	PESCO appreciates the community support for the project.	18.05.2021 - PESCO
132 KV Hangu Grid Station Staff and Community around the Grid Station (Augmentation work)	<p>During execution of developmental work within the premises of GSS and Maintenance work no such noteworthy issue observed, as the work executing team was aware of the prescribed procedures and due consideration is paid to the GSS operation staff and peoples residing within the colony.</p> <p>The area opposite to the GSS is a commercial area, different shop keepers were interviewed to get their comments, views, suggestions and feedback. Most of the shop keepers responded that, in the near past due to prolonged power outages their commercial activities suffered badly, now after gradual improvement in the power sector, the commercial market expanded.</p> <p>Mechanic Works workers added that in past the long hours load shedding badly disturbed their work progress and considerable affected their livelihood, now after gradual improvement in the GSS, the improved electricity supply have boost up our livelihood.</p>	Noted	18.05.2021- PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>Car Wash Center workers were also interviewed added that in near past the electricity supply interrupted their work progress a lot, after gradual improvement in the power sector improved their livelihood by improving their performance.</p> <p>General store owners interviewed, added that in past our ice cream supply was destroyed and in current times the situation is a little improved</p>		
132 KV K D A Grid Station Staff and Community around the Grid Station (Augmentation work)	On the subject of the impact of Development and maintenance works on people residing within the vicinity of the Grid station, the grid station staff maintained that no such undesirable impacts have been observed in the past. Contractors/firms/GSC staff execute the work strictly adhering to technical and safety protocols.	Noted	18.05.2021- PESCO
DG Khan–III Grid Station Site, DG Khan	Community people in general were supportive for construction of grid station in their area and appreciated that project is a good initiative. It will reduce issues of low voltage, load shedding and overbilling community people are facing. However, community members on the basis of their past experience showed their concerns related with construction of the proposed grid station and allied transmission line. They explained that PARCO oil line is passing through their land. 132KV transmission line recently constructed, is passing through their land. DG Khan Northern bypass under CPEC is also expected to cross from their agricultural land. Therefore, they were afraid that the proposed grid station may decrease the value/price of their land. They also inquired about the payment of land and possible jobs/employment opportunities of the proposed project.	Land will be compensated according to the prevailing market rate and local labor will be preferably hired during the construction phase of the project	14.01.2021- MEPCO
Khanewal – II Grid Station Site	People informed that almost all HHs have access to electricity, but complained about low voltage, load shedding (in summer season) and electricity price/bills. They welcomed the proposed grid station and	Families who will be dislocated will be fully compensated to restore their status to equal or better than pre project level.	22.01.2021- MEPCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	appreciated MEPCO's initiative to resolve load shedding and low voltage problems. Khanewal-II grid station is proposed to be constructed on state land. One participant showed his concerns that construction of the grid station may dislocate his family members who have been living there since 2014.		
Punjab Environmental Protection Agency	Assistant Director (EIA) Environmental Protection Agency, Lahore informed that Project may create the issues of Right of Way (ROW), oil leakage and land contamination, persistent organic pollutants (POPs)/PCBs, Resettlement and Land Acquisition. Crossing of 132KV Electricity transmission lines from populated areas may cause fatal and non-fatal accidents for humans, animals and birds species. Electric Magnetic Field causes cardiac issues and is hazardous to human health, in particular for the community residing along the high transmission lines routes.	Noted. Mitigation measures have been proposed in the ESMP.	30/12/2020- MEPCO
Sindh Environmental Protection Agency	The official asked about the environmental assessments of EDEIP and expressed willingness to be engaged in future consultations	At this stage framework preparation is ongoing and the assessments will follow. Furthermore, the benefits of the project was explained to him and it was shared that the EDEIP is a World Bank funded project and presently the design has not commenced	23/6/2021- HESCO
WWF-Pakistan	Director WWF-Pakistan expressed concerns regarding the impact of high transmission lines on migratory and local birds' route and impact of project on flora and fauna of the project area. He further clarified that Bahawalpur, Rahimyar Khan and Layyah districts are the habitat of houbara bustard; a most vulnerable specie. According to the description of the project it may cause harm to the habitat of the houbara bustard, therefore the Director suggested that the DISCO conduct a GIS	Noted and proper mitigation measures will be employed.	31/12/2020- MEPCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	based biodiversity mapping and try to avoid transmission lines crossing from wetlands, protected areas and the bird's sanctuary to reduce the project impact.		
Social Welfare Department	<p>Director Social Welfare Department, said that the proposed project may create issues of resettlement, social mobility, and socioeconomics. The project may also disturb the social cohesion and social boundaries of the people of project area if resettlement occurred.</p> <p>He suggested that the local community be involved/engaged from planning to execution of the project and proper compensation be paid to the affected persons/HHs. Hiring of local community may be made on the basis of a quota system at the project site. This kind of step proves helpful towards reduction of conflict at project sites.</p>	Land will be compensated according to the prevailing market rate and local labor will be preferably hired during the construction phase of the project	30/12/2020 - MEPCO
Women Development Department	<p>The official was of the view that women are the key consumers and end users of electricity therefore, there is a need to sensitize the key consumers and their participation in all aspects. He suggested that the project launch an awareness campaign among households' female regarding energy consumption.</p> <p>He further suggested that a gender based beneficiary output analysis and need based net-metering (following a socioeconomic assessment of electricity) be carried out.</p> <p>Facilitation for women friendly participation be made towards project execution and public –private partnership be promoted to control electricity theft.</p> <p>Gender sensitive board/committee to be adopted for implementation of gender sensitive model in fixing force against the financial discrepancies.</p>	Project will recruit a Gender Specialist to address the relevant issues.	30/12/2020- MEPCO
Labor and Human Resource Department	Director workers' welfare and human Resource showed concerns over the cable cluster system. He pointed out that cluster style and hanging of domestic/commercial meters on the poles are hazardous and sparking may	The recommendations are noted and will be taken up in this project.	28/12/2020- MEPCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>cause to fire and severe incidents. Therefore, this cable system needs to be environment friendly. He suggested that:</p> <ul style="list-style-type: none"> •Local labor be given preference in hiring at project site. •Ensure medical facilities at project site for the workforce labor. •Introduce seasonal clothing allowance for the workers. •Give priority to the worker's health. •Make the project cost effective and community beneficial. <p>Minimize threat to life and ensure labor safety.</p> <ul style="list-style-type: none"> •Purchase of local machinery will reduce the cost and prove technical beneficial. 		
Department of Irrigation	<p>Both the Additional Secretary and Deputy Secretary (irrigation) appreciated the project and said such type of projects are very necessary to meet. The current energy crisis with limited resources. He said that our county is facing water crisis too. Canals are shrinking and not meeting required water for irrigation. People are installing tube wells to irrigate their crops. This project may be helpful to meet their electricity requirement.</p> <p>He expressed concern over the erection of poles/towers along the road side and canals. During extension of that particular road/ canal bank, the department faces difficulties and therefore proper permission may be taken before erection of poles/towers along the road side or canal bank.</p>	The recommendations will be followed during construction and a proper NOC will be sought from the relevant department.	31/12/2020-MEPCO
Agriculture Department	<p>Director Agriculture department also appraised the project initiative and said that project is beneficial for all layers of the society. It will provide business and employment opportunities in project areas however, he also suggested that along with EDEIP, the following measures may also be helpful towards energy efficiency and improvement.</p> <ul style="list-style-type: none"> •Energy audit be carried out in offices. 	Suggestions were well noted.	31/12/2020-MEPCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<ul style="list-style-type: none"> •Uniform interior design be implemented for government offices according to their use of energy requirement. •Cost effective and environment friendly electric appliances be introduced. •Clean, and renewable energy projects be promoted particularly, solar energy projects in MEPCO jurisdictions. •Austerity measures, AC policy and timing efficient appliances be adopted. •Awareness program at domestic level be organized for safe energy usage. •Awareness and sensitization on Net-metering projects among the electricity consumers. so they may sale excessive electricity back to distribution companies. •Underground electricity distribution be promoted. It will be helpful to reduce electricity theft, less hazardous to human life and livestock, be better aesthetically and prove to be environmentally friendly. 		
Department of Environment, BZU.	<p>Chairman Department of Environment, BZU Multan was of the view that the proposed project may have minor impacts that can be avoided or mitigated through proper planning and measures. He suggested that the project :</p> <ul style="list-style-type: none"> •try to introduce green technology and invest in solar portion particular in the MEPCO Jurisdiction. •be environment friendly, cost effective and community beneficial. •Plantation of deep rooted tree and long life trees to prevent from wind at the generation site 	Suggestions will be brought to the notice of the higher management for action.	28/12/2020-MEPCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<ul style="list-style-type: none"> •Tree plantation along the transmission lines route and grid station site can control the dust •Minimize threat to life and ensure labor safety. •Purchase of local machinery will reduce the cost and prove technical beneficial. •Formulation of proper storage plan and construct storage tanks away from the project site • A Social Assessment should be conducted to gauge how many people will be impacted as their livelihood, and housing will be impacted.. it's not just houses its also animals.. its more than a house. • A mobilization process has to be carried out to make people aware.. NGOs and media are very active. • Complaint cell should be accessible. There should a booth to provide services. Billing is easy and facilitated so there should also be an easy complaint mechanism 		
PEDO	<ul style="list-style-type: none"> • PEDO representative commented that it is a very good initiative to upgrade the existing system and to cover the lope holes if there is any existing in the system to facilitate the general public , commercial and industrial users, as MMHP is beneficial for very limited area and for limited uses and for very limited operation whereas PESCO Project is for commercial and industrial purpose and also sustainable in its nature. • He further elaborated that PEDO is working on a small Mini hydro power project, small scale limited production in a particular area, and small scale distribution to the end users to facilitate them and improve their livelihood, • He added that their approach in developing or framing project is community based approach, he added that, it is a community driven process, 	Noted	19/01/2021- PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>community village organization is established in the inception phase of the project and they are trained on the principle and procedure of the operational mechanism of the village organization, after that they are involved in the identification of the potential project in their area, after identification of the potential project is planned with 20 % share of the community and 80 % share of the project, under the ownership and supervision of the village community organization project are implemented and are operationalized. The village community organization decide the tariff for consumer, the village community organization has the sole ownership to run and maintain the Mini hydro power project. The income generated from the MMHP is used for the maintenance of MMHP and surplus amount is used for the uplift of the village (other social benefit related interventions). Mr. Shakeel further explained that, MMHP have improve the livelihood of the project catchment area, particularly women get empowered, and they have established their vocational centers at village level. PEDO implementing these projects through their implementing partners i.e. SRSP, AKRSP, WWF the village community organizations are established by these respective CSOs.</p> <ul style="list-style-type: none"> • In recent times PEDO has conducted IEEs for their donor funded developmental projects, further he added that, along with MMHP PEDO is also working on other hydro generation projects and are also engaged in solarization of Mosques, Hospitals and schools. 		
Labor department	<ul style="list-style-type: none"> • Expressed interest in knowing about the benefits of the project and also asked for detailed project assessments, including on the aspect of capacity building. 	In response to the question of benefits, officials were told that various components of the project have different outcomes like construction of new grid	22/6/2021- HESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<ul style="list-style-type: none"> • Also expressed concern on the health and safety mechanisms during the project. • The labor dept expressed interest in being invited for orientation programs for EDEIP. 	<p>stations which will increase the reliability and enhancement in uninterrupted supply of electricity; whereas the modernizing operation and management will help in improving the systems and help in better control of management & operations of electricity network.</p> <p>Furthermore, the component of capacity building was explained to the Labor dept. HESCO detailed how the capacity will be enhanced in terms of improving operations and maintenance practices through procurement of tools and equipment and by conducting studies and assessments including preparation / updating of manuals, procedures and systems in particular for inventory management, planning, E&S management, procurement, financial management, customer services, etc.</p>	
Planning and Development Department	<ul style="list-style-type: none"> • the official mentioned that the directorate do scrutiny of the PC-II and PC-I submitted by the line departments, during scrutiny the focus of the directorate is to vet the documents economically socially and environmentally as already prescribed in the PC-II and PC-I Proforma, the official added if the department does not consider the social and Environmental parameters meticulously then the documents are sent back with observations to 	Noted	23.12.2021 - PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>incorporate the social and environmental aspects rationally.</p> <ul style="list-style-type: none"> • During consultation about EDEIP, the P&D Directorate was aware of the same requirement of international donor agencies as the same department has created a wing named foreign international Fund, and a detailed discussion on the donor requirement and KP Environmental Protection Act took place • The P&D official emphasized on the inclusion of Environmental cost in the PC-I Document. • The P&D official appreciated this imitative, as they do have their own Environment directorate which is being monitored by the P&D (M& E) department. 		
Local Government, Election & Rural Development Department	<ul style="list-style-type: none"> • According to the official, at the directorate level they receive complaints from field formations that lines are crossing our infrastructure. • Beside this compensation made in lieu of damages caused by WAPDA/PESCO transmission line not appropriate and on time. • Over billing issue takes considerable time for settlement. • PESCO should take the necessary steps to explore alternative options for Power supply i.e Solar package, Net metering etc. She concluded that the proposed package would have a positive impact on the community. 	Transmission lines should be installed at a distance from residential and commercial areas. A comprehensive GRM will be in place to resolve any public concerns/ grievances/ complaints etc.	22/12/2021- PESCO
Directorate Of Man Power And Labor	<ul style="list-style-type: none"> • the official revealed that, the major issues and complaints received at directorate are related to discrimination in wages, delayed payment, working hours beyond the permissible limit. • The 2nd major issue is of child labour which is almost very common in all sectors, during raids at different locations, it is found that mostly child labour are engaged with their parents, and parents are the custodian of their children, the issue department is facing to discourage parent based child labour. As far as the union is concerned, there is strong registered 	The concerns raised have been addressed in the project LMP and ESMP and will be fully complied in accordance with the national and provincial laws and World Bank standards.	22/12/2020 - PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>labour unions for men and they are working very actively for the rights of laborr, in the case of women, the law permit their union/ association, but there is no women union/association registered under this directorate, because of non-existence of women associations they are facing acute issues of various type of harassment, more than 14000 women labour are working in pharmaceutical industry.</p> <ul style="list-style-type: none"> • The third major issue is safety of labor, the official argued that, during monitoring visits to different field formations, it is noted with great concern that, neither Proper PPEs are provided to their workers nor first aid Box and other related equipment/accessories are available at the working site. • The directorate capacity is very limited to provide full coverage regarding labor rights, in this connection department is holding awareness seminars in collaboration with NGOs and other stakeholder. The official suggested that, employers are required to incorporate the prescribed labor rights in the bidding document as special clauses. 		
Forestry and Wildlife Department	<ul style="list-style-type: none"> • According to the interviewed official, deforestation is the major issue, forest cover area is approximately 5.2 % and for balanced ecosystem the country must have 25 % forest cover of their total area • The official asked whether the transmission line/ Grid Station construction will affect the forest ecosystem. the official shared two major cases reported to their department, one is evacuation of power from Dasu by NTDC passing through Government reserved forest disturbing the habitat of the endangered species Tragopan pheasant and limiting the forest cover, the 2nd issue observed is various hydel generation projects in 	Tree plantation along the transmission line has been included as a mitigation measure through this project. Other suggestions are noted.	23/12/2020- PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>KPK disturbed the aquatic ecosystem specially river Swat and Panjkora.</p> <ul style="list-style-type: none"> • Regarding the proposed project the official argued that, as the package is within the existing facility and upgrading the already installed system, so it is hoped that, there is no threat to forest/wildlife. He added that timely completion of project will help this department, as this department utilizing huge expenses on alternative options like generators, UPS , which is not a sustainable solution, • This project will help the department through stable uninterrupted power supply, and the department will divert the amount to research work and further expansion in forest development interventions. • The official suggested that, if space is available in the proposed Grid station, develop Proper Landscape of indigenous flora that will balance the already disturbed vegetation cover. 		
EPA KPK	<ul style="list-style-type: none"> • the EPA official disclosed that, in recent past during public hearings of various NTDC and WAPDA projects the affectees raised their concerns that, the compensation paid for the damages caused due to the proposed developmental activities is not appropriate. • Also the general public criticized the Government land acquisition process. • In conclusion the EPA officials appreciated the proposed package Funded by World Bank and assured their full support and guidance in light of KP Environmental Protection Act 2014. 	<p>While working with ADB in the past, PESCO adopted the Bank Policy “Pay before damages”. The compliance of the policy resulted in the smooth implementation of the project, as the compensation was prepared on current market rates and paid to the affectees well in time. The same package is also comprised of extension and augmentation works that are to be carried out in the existing Grid stations, and neither land acquisition is involved nor is transmission line construction proposed. Regarding the ABC Cabling project, the importance of the insulated cable is</p>	24/12/2020 - PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
		underscored in that, the bare conductor replacement with highly insulated cables on one hand, will overcome the issues of technical and commercial losses thus minimizing the pressure on power generating units, which will save energy and ultimately lead to a reduction in the emission of greenhouse gases. On the other hand it will eliminate fatal and non-fatal incidents impacting both PESCO line staff and the general public.	
Directorate of Archeology and Museum KP	<ul style="list-style-type: none"> • Regarding PESCO's transmission line work, the officials showed their concern that on some archaeological sites transmission line crossing exist (Kafir Kor D.I Khan, Ghor Ghatrai Peshawar) which banned as per law. • the representative suggested that in future if PESCO has to carry on their routine developmental works at least 200 meters away from the archaeological sites. • the official informed PESCO the directorate has future plans of catching maximum international tourist by providing essential facilitation and establishing infrastructure in their archaeological areas and power supply is one of the urgent needs for this infrastructure, and he hoped that the proposed project will meet this desired requisite. 	No such activity is envisaged in EDEIP that could affect the historical site	24/12/2020 - PESCO
Directorate of Social Welfare and Women Empowerment	<ul style="list-style-type: none"> • most of the servicing facilities of the directorate falling in high loss areas where PESCO has tight load shedding schedule, forcing the directorate on use of alternative power supply options to run their established institutions through generators, UPS which are not reliable and durable 	To control theft and ensure safety, PESCO has proposed ABC Cabling on the high loss feeders.	24/12/2020- PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>source, further aggravating their financial constraints.</p> <ul style="list-style-type: none"> • the proposed package is good initiative to upgrade the existing system to cope with the forced load shedding and improve the capacity of the system to provide uninterrupted power supply • Emphasis put on the control of electricity theft which is main cause of load shedding, as PESCO is maintaining tight schedule for high loss area. The official noted that, the timely execution of the project will not only cure the anxiety of the general public but will also encourage investors to establish industries, the directorate will link their skilled personnel with the industry thus minimizing the unemployment pressure on Government. 		
Revenue Department	<ul style="list-style-type: none"> • The focus being on land acquisition and compensation, related issue of PESCO project the official noted that the land acquisition Act 1894 is the only legal instrument every department relies on . • Regarding adoption of direct negotiation with the land owner, the revenue dept official strongly disagreed with the said option that every state department is bound to comply with the county laws otherwise there are certain state departments. such as audit, FIA, NAB that charge for violation. • He pointed out that the compensation is only for damages of crops/ trees not for actual devaluation of land. • Paying before damages is a good approach but if patwari and other concerned personnel are empowered to increase the compensation payment and avoid discrimination in making compensation payment for poor and influentials. • He suggested that the said Act belongs to British colonial era and the need of the day is to revise the said Act in light of international lending agencies guidelines. 	The project will fully comply with the World Bank ESS5. In case of any gap in National and Provincial laws, the World Bank policy will be followed and compensation of land under grid stations and transmission lines will be paid in the form of an allowance in accordance with the market rate.	30/2/2021 - PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
Sarhad Rural Support Programme.	<ul style="list-style-type: none"> • SRSP noted that EDEIP is a good initiative if timely and effectively completed. As SRSP has different livelihood endeavors at northern areas and merged districts(Ex- FATA), the timely completion of this project will boost the function and productivity of these livelihood centers, which will in turn make the local population economically empowered especially the marginalized and deprived segments of the society. • The SRSP official while sharing his experience informed the PESCO team that in District Kurram there are more than 400 tailor shops operating in Parachinar city, and due to prolonged power outages their livelihoods are badly affected. • Similarly, there are numerous skilled women in SRSP's community outreach who don't have access to reliable power supply so they are unable to meet the market demand, as such this issue is further aggravating their miseries. 	The power outage issue will be improved under EDEIP through an efficient and regular supply of electricity.	21/12/2020- PESCO
Shirkat Gah	<ul style="list-style-type: none"> • The official noted that as SG is a women focused organization working on the advocacy of women basic rights, arranging women open court to address their issues, women having 24/7 duty and being marginalized already in stress due to conservative nature of the society, and most of the household activities are mechanized and dependent on power supply. The interrupted power supply further augments their stress levels leading to domestic conflicts, badly affecting normal housekeeping. • While sharing her experience on the above, there were open court activity for women at swat to resolve their issues, there was an emergency issue of power supply, women of the areas were badly affected by the interrupted power supply, and they were asking for immediate solution, SG consulted the concerned department through open 	See above	23/12/2020- PESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<p>court and addressed their outstanding issue.</p> <ul style="list-style-type: none"> • PESCO works have never impacted the organizations activities, women mobility or any women's intervention. 		
Khwendokhor	<ul style="list-style-type: none"> • Regarding the pros and cons of the proposed project, KK official said that, obviously it is good to upgrade the overload system, but during entire discussion KK official focused on theft of electricity due to high tariff. • He also added that, if the tariff is revised keeping in view the financial capacity of the public, the issue of theft will be fixed. • KK official suggested that the Government is required to devise strategy to bring the consumers of the high loss areas in the mainstream of the regular paying consumers in order to curb the issue of long hours shedding in the area, as there are regular paying consumers also exit and suffering. Apart from this most of the investors desired for establishment of industrial units but unable to do so. • On the proposed World bank project, if initiated and completed timely, the officer predicted that, it will not only address the long hours power outages but will also generate local jobs. 	Power outages will be improved under EDEIP. During the construction phase, unskilled labor will be recruited locally.	23/12/2020 - PESCO
Sindh Development Society	<ul style="list-style-type: none"> • High transmission lines in cities should not be near houses/ apartment building as it is dangerous • Urban land which is fertile should not be used for transmission lines and tower erections. • HESCO should secure its transmission lines which are near houses or bumping into trees • Environmentally friendly grid stations etc should be kept in mind. • A social assessment should be done to see impact on people both livelihood, and housing is impacted, also animals and agricultural fields • Mobilization process should be carried out to make people aware and NGOs and media can be good platforms. For instance, there is an electricity act which nobody knows about. 	The suggestions will be considered during the construction phase of the project.	3/12/2020 - HESCO

Stakeholder	Points of Discussion and Concerns Raised	Response from Disco	Consultation Date, and DISCO Responsible
	<ul style="list-style-type: none"> • Community should get better service. Electricity theft takes place in katchi abadis. Electricity rates should be fixed to avoid irregularity of electricity bills. • The complaint system should be accessible just like billing is easy and facilitated so should the complaint mechanism 		
National Rural Support Programme	<ul style="list-style-type: none"> • A compensation plan for communities is necessary in situations of land acquisition.. Living in that areas their land is impacted and compensation should be at the market rate. The same applies in situations of land acquisition for grid stations • Local labor should be hired • The Community would benefit from new lines. In HESCO areas and program areas the lines are so old that they fall and there are mishaps and people die, including line staff • Health and safety guidance for Disco staff should also be ensured, especially of line men. • An efficient GRM system should be in place that is well publicized. • Social mobilization and community outreach should be conducted in the local language -Sindhi. IEC material should be distributed along with trainings. 	The project will provide land compensation at the market rate. A GRM will be in place. Health and safety guidelines have been outlined in the project ESMP and LMP.	3/12/2020. - HESCO

Annex 4: Agenda for WePOWER Meeting



Pakistan DISCO Forum for South Asia Women in Power Sector Professional Network (WePOWER) – June 2, 2021 - Virtual Meeting (TBD)

Background: According to the World Economic Forum Global Gender Gap Report 2021, Pakistan's gender gap has widened as it ranked 153rd among 156 countries assessed. Pakistan is placed at 152 in economic participation and opportunity, which is among the top 10 countries with the largest gap in this sub-index.²³ This reality is reflected in the Pakistani power sector, where a 2019 baseline assessment by the World Bank found the total representation of women to be only 3.6% of total employees. This figure was only slightly better for women technical employees at 4.6%. The sampled DISCOs had a lower than average number of female employees, at 1-2% of total employees.

To help address this gender employment gap in the Pakistani power sector (and other countries in the South Asia Region) the World Bank established the South Asia Women in Power Sector Professional Network in 2019. The World Bank has renewed its commitment to WePOWER until 2024 under the South Asia Gender and Energy Facility II (SAGE II) program. As the Interim-Secretariat, SAGE II was authorized by senior management to expand and scale up WePOWER through an extensive [workplan](#). One of the key goals is to increase the number of WePOWER Partners in Pakistan towards our goal of 50 total partners by 2024.

At present, WePOWER has 27 Partners of which five are from Pakistan. We are proud to count on K-Electric, Water and Power Development Authority (WAPDA), Women in Energy Pakistan (WiEP), Women Engineers Pakistan (WEP), and Pakhtunkhwa Energy Development Organization (PEDO). For Pakistan, our Partners have completed a total of 224 activities helping 5551 female beneficiaries from 2019-2020. Last year, in response to the COVID19 pandemic, our Partners came together to host the largest virtual job fair ever in Pakistan, with 530 female students participating and networking through the event.

For 2021, as part Pakistan Electricity Distribution Efficiency Improvement Project, SAGE II is hosting a forum with Pakistan DISCOs to showcase how WePOWER can be effectively leveraged to achieve organizational diversity and human resources requirement goals towards and promote gender equality in the Pakistani energy sector.

Tentative Agenda (Total Time: 1:30 hours)

Objective: The objective of the Pakistan DISCO Forum is to 1) discuss the gender employment gap in the energy sector amongst the Pakistani DISCOs, 2) provide an overview of the WePOWER Network, and invite the Pakistani DISCOs to join the WePOWER Network 3) and demonstrate how WePOWER can help to fulfill gender tag corporate requirement.

Part 1: Gender Gap in the Pakistani Power Sector- why we must all do our part to address barriers for women into the power sector (40 minutes)

²³ <https://www.dawn.com/news/1615763>

- **Introductions and Welcome Remarks (5 minutes)**
 - Mohammad Saqib (Senior Energy Specialist, WB)
- **Keynote – Increasing Opportunities for Pakistani Women in the Power Sector (10 minutes)**
 - Chairman of the National Electric Power Regulatory Authority (NEPRA)
 - Simon J. Stolp (Practice Manager, South Asia Energy, World Bank) - General WB Goals Commitments for Energy + Industry Trends, Experiences from other countries + Why Gender is an important WB corporate requirements for project/sector + WePOWER
- **WePOWER in Pakistan (25 minutes)**
 - Pakistan Energy Sector Barriers for Women (15 minutes) - Saadia Qayyum (Energy Specialist, World Bank) and Faiza Savul (Head of Center of Expertise, Human Resources, K-Electric)
 - i. Present Statistics - WePOWER Baseline Assessment, WB Country Gender Assessment
 - ii. Discuss Barriers/HR skills gaps faced by utilities
 - iii. Personal Experience
 - WePOWER Overview (10 Minutes) - Uzma Quresh (Senior Social Specialist, World Bank) and Gunjan Gautam (Energy Specialist, World Bank)
 - i. Framework and Approach (importance of data)
 - ii. Achievements for 2020 + Pakistan partners
 - iii. Workplan until 2024 (Events and Gender Modules)
 - iv. Internalizing WePOWER in SAR Energy Operations through Gender Tag

Part 2 – Discussion Session - Joining WePOWER and Next Steps (35 minutes)

- **Panel Session – WePOWER in Pakistan- Looking to the Future. What can we learn from other utilities? (25 minutes)**
 - Moderator: Simon J. Stolp (Practice Manager, South Asia Energy, World Bank)
 - Panelists: 1-2 Pakistan DISCOs, Ceylon Electricity Board (CEB) Chairman, Bhutan Power Corporation (BPC) HR Manager, Bangladesh Rural Electrification Board (BREB) CEO, K-Electric HR Manager, Water and Power Development Authority (WAPDA) HR Manager,
- **Key Discussion Q&A Session with DISCOs (10 minutes) - How can WePOWER best support Pakistan’s DISCOs? What do you need?**
 - Moderator: Simon J. Stolp (Practice Manager, South Asia Energy, World Bank)
 - Discussants:
 - 3-4 Pakistan DISCO Representatives
 - Clare Novak (International Diversity and Inclusion Consultant).

Part 3 – Technical Session and Closing - (15 minutes)

- **Introduction to the Gender Tag (10 minutes) - Uzma Quresh (Senior Social Specialist, World Bank)**
 - Overview of the WB Gender Strategy FY16-23
 - Gender Tag Process
- **Closing Thoughts and Next Steps (5 minutes) - Rikard Liden (Lead Energy Specialist, World Bank)**
 - Commitment and Individual Follow up by SAGE II (WePOWER HR Survey, List of Activities)

Annex 5: Synopsis of Workshop Discussions

Date of Workshop: 15th June 2021

Time: 11:00 am to 1:00 pm

Consultative Workshop-MEPCO

Sr. No	Discussion Question	Name of Participant and Organization	Response/Comments from Participants	Response from MEPCO
1	What environmental and social risks and impacts can you identify/envision that the project may have?	Assistant Director EPA Khanewal	<ul style="list-style-type: none"> • It is very good project and it is very good initiative that you started consultations with the stakeholders at the beginning of the project. In earlier projects MEPCO consulted stakeholders at the end of the project or during execution which was of no use because at that time we cannot see the other alternative site and cannot take proper mitigation measures. • The environmental and social impacts of the project need to be considered on: impact on vegetation/trees, impact on settlements and on cultural heritage and other things which will come in the right of way of the line. If there are existing trees/plantation, how many number of trees/plants we can protect, how many number of trees will be replanted and what will be impact on health of local people and on the environment. • We appreciate these efforts and expect these consultations should remain continue in future. 	We shall incorporate these suggestions in the project documents
		Chairman Department of	<ul style="list-style-type: none"> • Really appreciate the efforts of the World Bank and MEPCO jointly working to enhance the capacity of electricity distribution system. Whenever there will be construction of 	We are thankful that you highlighted both positive and negative impacts of the project. We shall incorporate your suggestions in our documents.

		Sociology, BZU Multan	<p>new transmission lines and new grid stations, there will be positive social impacts on the local people. People will be financially strong. New job opportunities will be created. New factories can be established with the reliable and continuous power transmission and people of the areas will get more jobs and earn livelihood. There will be improvement in agriculture. The areas where canal water is not available people can install new tube wells with this power and can irrigate their fields.</p> <ul style="list-style-type: none"> • Related to health hazards, various studies reported that the children living in houses as far as 600m from power lines had an elevated risk of leukaemia and electromagnetic field is harmful for birds and plants and it is also harmful for human health. These are reported in various studies. There are negative impacts of these TLs which included depression, aesthetic harm and noise and danger for air traffic. • If a transmission line is broken and causes harm to livestock, there is no social security for the people in such cases. There should be some mechanism related to this. The areas from where these transmission lines are passed restrictions are imposed in the area that no one can construct house more than one storey and issues of cultivation, no one can purchase that land there are economic losses. Heat and noise is also produced from the transmission lines. We also need to review the system of developed countries where these lines are passed through underground. Most significant environmental impacts of transmission lines are changes in land scape, restrictions on land use. The impacts of the new project can be felt 3-4 years before and 3-4 years after the project. We have students who are doing their M.Phil in Sociology and my suggestion would be that we can assign them research topics so that they may offer their services to the project and assess that what was committed in the social documents that the people will be benefitted 	
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			<p>from the project, get more jobs and will be economically and socially stable really came true or not. They also can help in studying baseline conditions in the proposed project areas.</p> <ul style="list-style-type: none"> • There are positive impacts of the project and we should appreciate this work so that the efficiency of the distribution system should be enhanced and in this way people will get more benefits. 	
		Social Sector	<ul style="list-style-type: none"> • You will develop the grid station and the transmission line which will pass through the land, is there any legal mechanism that will be followed by MEPCO for land acquisition or payment of compensation? • These days the focus of the government is to produce electricity from solar. The people who are producing electricity from solar and that is included in the grid through reverse metering system. Is there any mechanism in MEPCO to give incentive or promotion to such producers or community? 	<ul style="list-style-type: none"> • Regarding land, MEPCO tries to construct grid station on the government land. The government land is transferred to the department through a system by the board of revenue. This land is acquired on 10 percent surcharge means higher than the market rate. We do not acquire the land from where the transmission line passes. As per our policy, only compensation is paid in three layers. If there is one crop, we pay compensation for three crops. Then erection is done and during stringing we measure the area in presence of revenue department and pay compensation accordingly. • We do not acquire the land because the height of tower is more and cultivation can be done easily underneath the tower. If we acquire one portion of the land then there will be issues of land rights with the community. • The areas from where the vegetation is lost, we replant trees with 1:3. It is also our policy that at every new grid station we plant 500 new trees. • There is an already established mechanism in the department to purchase electricity from the community which is produced through solar system.

		<p>AD Environment, Layyah</p>	<ul style="list-style-type: none"> • Is it compulsory that the constructions will be carried out at the sites which are specified in this workshop or have you considered alternate sites as well? Because in some cases the sites are located in areas which are very busy or commercial and there negative impacts override positive impacts. Please consider option of alternate site selection. • Please consider the electromagnetic impacts and address those impacts. 	<ul style="list-style-type: none"> • The sites which we are selecting should be away from the population and should have an independent entry and exit. The grid sites should be near the already passing transmission line. Our grid station sites are within 500-1000 m of the line. Only at one site this distance is more. • These sites are only identified ones and not compulsory. That site is selected where minimum environmental and social issues are involved. The selection process is carried out by a committee of eight people. People from different allied sections are included in the committee. Two to three alternative sites are studied and most feasible one is selected. • As per WB Policy the land for tower is not acquired but compensation is paid to the affectees for the losses and compensation for crop loss is paid before the start of civil works. As per government policy we pay the compensation of foundation, erection and stringing within a given timeframe to the affectees.
		<p>Former WWF Employee. Currently MBA Student from LUMS</p>	<ul style="list-style-type: none"> • This is very good initiative that we are doing this project to overcome line losses. It is mentioned that the trees will be cut and new trees will be planted in other areas. When one mature tree is cut down that absorb the 48 pounds of carbon dioxide from the atmosphere and new planted tree takes time to absorb carbon dioxide. It is a good initiative but there should be other ways to protect the flora of the area which will be impacted by the transmission lines. 	<ul style="list-style-type: none"> • The clearance of vegetation under the transmission line is necessary and cannot be avoided. The RoW (i.e.30 m) should be clear from vegetation. We cannot replant tree under the transmission line and other areas are selected for that purpose. The type of tree is selected keeping in the view the area. • The WB Environment Specialist explained that we are aware of this issue and exploring to plant the new trees. A tree plantation plan for the project is prepared and ensure that the plantation ratio should be from 1:5 to 1:15 normally. The number of replanted saplings is more. We will ensure that the sapling should be

				planted before the cutting of the tree so that there should not be more imbalance in carbon sequestration.
		Labor Department	With the transmission efficiency, if we focus on solar power then we could reduce the tree cutting and it will be environment friendly. The developed countries are also adopting solar power now a days.	<ul style="list-style-type: none"> Quaid-e Azam solar plant was installed and power came to the grid which was distributed through the transmission line. The transmission line would be required in any case whether the power comes from hydro, solar or wind. The basic infrastructure is very much required.
				<ul style="list-style-type: none"> The WB Sr. Social Development Specialist explained about the WB policy of compensation payment. There are 10 standards of the WB and standard 5 deals the land acquisition, compensation payment and restrictions on land use. Under standard 5, there is compensation for the land which is under the tower even if it is not acquired. The losses in the form of crop or restrictions will also be paid/compensated. The engagement of the WB with MEPCO is based on the understanding that the compensation will be paid of the transmission line towers and losses. It is a requirement of WB that the compensation payment process will be completed before the start of any civil works at site.
		Chairman Department of Sociology, BZU Multan	<ul style="list-style-type: none"> Community participation and awareness is very necessary for the success of the project. When community will be involved in the project preparation then the people will own the project. 	Community engagement will be carried out as part of stakeholder consultations through the life of the project.
		Social Sector	<ul style="list-style-type: none"> The areas from where the transmission line passes, the value of land is reduced underneath these transmission line. You did not acquire that land and only compensation for crop losses is paid. The permanent value of land is reduced. There should be policy to compensate land owners as the value of land is reducing permanently. 	<ul style="list-style-type: none"> We agree that the land which is under the transmission line, its value is decreased. Whereas in other projects, like road the value of land is increased. The process/system is now changing. Currently other than payment of compensation there is no policy. There should be some policy.

			<ul style="list-style-type: none"> For plantation of new trees, if you engage community then it will be successful. The community will look after the trees. If there is any such policy please explain. 	<ul style="list-style-type: none"> Regarding tree plantation ownership, we plant trees at the grid station site and looking after the trees is made the responsibility of the contractor for minimum two years and its cost is included in the BOQ. For plantation in the school, it is a suggestion that the teachers and students will be involved and fruit trees will be in their ownership. They will look after the trees and eat the fruit as well. School management committees should be engaged in this.
2	Could you suggest measures and interventions that the project could take to mitigate these environmental and social risks and impacts?	NRSP	The involvement of school children in planting trees will be very helpful. We have implemented this practice at one of our other projects. I shall be available to cooperate with you in this regard.	<ul style="list-style-type: none"> This suggestion will be considered.
		Social Sector	<ul style="list-style-type: none"> You know the route of transmission line and know that the trees will be cut from these areas. It is suggested that you involve the community at the beginning and start planting the trees so that when you cut the trees from the route, the replanted trees will be grown and will take their place. 	<ul style="list-style-type: none"> It is a very good suggestion.
		AD Environment, Layyah	<ul style="list-style-type: none"> Public consultation is required to resolve the issue of affected people. In tree plantation, involve the district management (DCs) and they will bound the government departments to carry out the plantation. Is there any technique available to reduce the impact of electromagnetic waves? 	<ul style="list-style-type: none"> One solution could be that the underground cables should be installed. It could be a possibility in near future.
		Labor Department	<ul style="list-style-type: none"> How can we handle the losses which occur due to the rains and how can we ensure the safety of the houses from where the transmission line passes? 	<ul style="list-style-type: none"> Our safety cell can provide awareness to the people about the electric wires. They should remain away from TLs in rainy season.
3	Do you have any experience of engaging with a similar project in the past and share examples as well as lessons learned on how to manage	Social Sector	<ul style="list-style-type: none"> Few years back, one project started drilling in the riverine belt of Multan area and there was a rumor in the area that this drilling is being carried out for exploration of oil and other minerals. People who were aware of the project, they started purchasing land in that area to earn profit. Similarly it is known fact that the value of land which is under tower 	<ul style="list-style-type: none"> We are bound to inform the community about the proposed project. The community should be aware of the development. If we do not consult with the people and provide them information then we are violating guidelines of the EPA and WB.

	environmental and social impacts?		and transmission line is reduced so the people will start selling their land before the start of the project. Is there any strategy/policy by MEPCO to curtail such practices?	<ul style="list-style-type: none"> • Our transmission lines pass through mostly unpopulated areas and there is no negative impact on land and land based assets. The reduction in value of land can be in the commercial areas which are very few.
4	In terms of engagement with this project, what role do you think your department/institution could play and specifically how can you collaborate during the implementation of the E&S management instruments?	Social Sector	<ul style="list-style-type: none"> • Sign small ventures with the organizations working in social sector. We shall work in collaboration with MEPCO, forest department and district administration in planting the trees in different areas. 	<ul style="list-style-type: none"> • MEPCO will engage with different stakeholders through the life of this project and work collaboratively to plant trees in different areas. • Community awareness and engagement will also be critical and the project will undertake such interventions through this project.
		NRSP	<ul style="list-style-type: none"> • We can help the project in providing awareness to the communities. The project will provide us guidelines and we shall follow those guidelines. 	
		Labor department	<ul style="list-style-type: none"> • We can help MEPCO in planting trees through the factories. The number of trees to be planted can be assigned to the factories keeping in view the size of factory. Previously we completed this exercise. The mapping should be done through the labour department. 	
5	How would you like to be consulted and engaged by the project over the next 5 years? What is your preferred mechanism/mode of consultation?	Social Sector	<ul style="list-style-type: none"> • We can come for a meeting in the MEPCO and workshops can also be arranged for discussion. If the project assigns us targets then we shall share progress of those targets with MEPCO. 	<ul style="list-style-type: none"> • Stakeholder workshops will be held through this project to include the views and recommendations of different stakeholder groups. • It is good suggestion. We shall look into it.
		Labor department	<ul style="list-style-type: none"> • Create WhatsApp group of the stakeholders and share your work progress in the group. 	
6	Institutional capacity (especially the government institutions) to perform your roles related to E&S management.	Chairman, BZU	<ul style="list-style-type: none"> • Training and capacity building may be provided to MPhil and MSc students of the Sociology Department so they can help in the field in terms of community mobilization 	<ul style="list-style-type: none"> • Thank you for the suggestion. We will consider it.
7	Capacity Strengthening	Social Sector	<ul style="list-style-type: none"> • You will develop an implementation mechanism for the project and different departments will be involved in the project. My suggestion would be that after finalization of 	<ul style="list-style-type: none"> • This is a good suggestion. The project will explore how to involve different stakeholders in trainings under the project

			mechanism, MEPCO should provide trainings to the people of those departments.	
8	Grievance Redressal Mechanism	Social Sector	<ul style="list-style-type: none"> Make a portal of the project and provide awareness to the people. People should use that portal to launch their complaint. 	<ul style="list-style-type: none"> The project will have a comprehensive GRM in place which will address complaints at the PMU and field level in a timely and transparent manner.
		Labor department	<ul style="list-style-type: none"> All the communities are not educated and cannot use portal. The mechanism should be simple. The project should share a phone number with the communities to launch the complaints. 	<ul style="list-style-type: none"> It is our practice that whenever we go in the field we share our number with the community.
9	Any other question/suggestion	AD Environment , Layyah	<ul style="list-style-type: none"> The complaints received by MEPCO from communities always remained very common like tripping of unit, load shedding etc. It is a WB funded project we should introduce and use latest technologies for the transmission of power. It will help in reducing complaints. Instead of a centralized grievance redressal system we should form small units in different areas to resolve the grievances of people at the spot. It will be helpful. 	<ul style="list-style-type: none"> The project will have a comprehensive GRM in place which will address complaints at the PMU and field level in a timely and transparent manner.

Date of Workshop: 16 June 2021

Time: 11:00 am to 1:00 pm

Consultative Workshop-HESCO

Sr. No	Discussion Question	Name of Participant and Organization	Response/Comments from Participants	Response from HESCO
1	What environmental and social risks and impacts can you identify/envison that the project may have?	Safco Support Foundation (SSF) Hyderabad	<ul style="list-style-type: none"> When we talk about risk and environment, the definitions of these aspects are very vast. With reference to environment and social commitment plan, can you please tell us which plan do you have which will be 	<ul style="list-style-type: none"> The project ESMP will outline the environmental and social risks along with mitigation measures and an implementation plan that the project will adhere to

			implemented at gross root level to minimize the environmental risks?	
		Assistant Professor, Sindh University	<ul style="list-style-type: none"> The environmental and social risks identified are: the impact on crops, livestock, on overall environment, and impact on communities. A detailed environmental and social assessment should be carried out before launching the project. The communities which will be affected by the project should be involved in the project. 	<ul style="list-style-type: none"> Environmental impact assessment study will be submitted to the provincial environmental regulatory agency for approval. In the assessment, the aspects like population in the right of way, relocation, birds and wildlife sanctuary are being considered. We do not disturb environment such as if there is a wetland, we do not erect tower in that location. It is our principle and we find alternate location. Your suggestions and points are valid and will be taken care in the report.
		Research and Development Foundation	<ul style="list-style-type: none"> The presenter was highlighting a number of documents but my concern is related to social risk management framework which will be prepared. Whether these documents will be implemented later in true letter and spirit. The history tells us that HESCO has not put in place an effective grievance redressal system for its customers. How the grievance mechanism as per standards of the world bank would be put in place to address the grievances of its customers. 	<ul style="list-style-type: none"> As far as the project is concerned, we conducted this workshop to get feedback from the participants. We formed the grievance redressal committee at HESCO in which members from the communities and local management were part of the committee. We visited the communities on an intermittent basis and paid them the compensation of their agriculture crops and noted their views and concerns. This is a continuous and regular process. We shall meet with the stakeholders and affected communities during the construction of transmission lines and grid stations.
		Sindh Irrigation and Drainage Authority	<ul style="list-style-type: none"> HESCO has to take care of their organizational staff who will try to send wrong messages to the community through the community as HESCO is going to engage with the community first time. It is a big risk and should be taken care during the implementation of the project. 	<ul style="list-style-type: none"> Community engagement is a critical aspect of the SEP and there will be regular and ongoing engagement with the different stakeholders through the life of the project.

2	Could you suggest measures and interventions that the project could take to mitigate these environmental and social risks and impacts?	Research and Development Foundation	<ul style="list-style-type: none"> Depute or identify focal persons at the cluster level or community level who should bring the grievances of the community/customers to HESCO and at central level and those grievances should be timely addressed in a dignified manner. It is learnt whoever comes at your grievances desk they are merely addressed. If you appoint citizens or your customers as focal persons of grievances that may effectively address the customers concerns. 	<ul style="list-style-type: none"> The project will have a comprehensive GRM in place which will address complaints at the PMU and field level in a timely and transparent manner.
		Assistant Professor, Sindh University	<ul style="list-style-type: none"> You should have one desk or counter in your office or regional centers where the customers/consumers note down their grievances and those grievances must be addressed. The link should be established with the people where this project will be implemented. 	Same as above
		Sindh Irrigation and Drainage Authority	<ul style="list-style-type: none"> There is provision of grievance redressal committee in your social and environmental impacts framework documents. That committee should be actively engaged and they should regularly meet. The departments face different consequences during implementation of project due to weak GRC. This should be taken care during implementation of project. 	Same as above
		Manager Training and Development, SSF	<ul style="list-style-type: none"> A survey should be conducted in the area where the project is going to be implemented to identify the risks related to HESCO operations so that those risks should be covered in the project 	<ul style="list-style-type: none"> An environmental and social impact assessment will be conducted based on identified risks and impacts, and specific mitigation measures will be suggested.

		PESCO	<ul style="list-style-type: none"> I would like to clarify about the grievance redressal mechanism. At DISCOs level we are talking about three level tier system of grievance redressal. In first tier, a team receive the complaint of people at local level and try to resolve in three days. If the problem is not resolved then it moves to Tier 2 which is directorate level where SDO and ExEn try to resolve issues within 2 days. If they issue remain unresolve at this level then it goes to senior management team at headquarter and issue is resolved there. We need to talk on development side not on the operational side. We need to provide input on development of new grids and transmission lines what type of mitigation measures would be required to address the environmental and social risks related to such activities. 	-
		GM Operations HESCO		<ul style="list-style-type: none"> We have different systems in place. We are available for the public on a 24 hr basis. Every sub division has a complaint center. Similarly at the division level, sector level and headquarter level there are complaint centers. If the complaint of a person is not resolved and he contacts us again we resolve the complaint from at the headquarter. The ssystem is already in place but due to lack of awareness, not all people knew about it. We have advertised the complaint numbers of HESCO in newspapers.
		SSF	<ul style="list-style-type: none"> Stakeholder engagement is a critical component in this whole process. Environmental and social framework is a vast subject. How will we ensure the strong input from the stakeholders at the 	<ul style="list-style-type: none"> We have noted all your suggestions the implementation of the SEP will entail regular engagement and coordination among the stakeholder groups

			gross root level? How can we ensure strong coordination between stakeholders and gross root level communities?	
3	Do you have any experience of engaging with a similar project in the past and share examples as well as lessons learned on how to manage environmental and social impacts?	Assistant Professor, Sindh University	<ul style="list-style-type: none"> To mitigate environmental and social risks, the safety sign boards and direction lines can be installed and awareness can be provided to communities about the hazards associated with the transmission lines. 	<ul style="list-style-type: none"> The existing system is 40-50 years old and the new system will be updated. All safety measures will be considered during the erection of towers, transmission lines and upgradation of grid stations.
		SSF	<ul style="list-style-type: none"> When we talk about new construction, can we say that there will be difference in construction activities in rural and urban areas. Will the transmission line go underground in urban areas? 	<ul style="list-style-type: none"> We do not have an underground system. All the existing systems are overhead. The clearance from the ground will be proper and safe.
		Professor Environmental Engineering Department, Quaid-e Awan University, Nawabshah	<ul style="list-style-type: none"> Can you please tell us under which circumstances this environmental impact assessment is being planned away? Is it under PEPA 1997 or under Sindh Environmental Protection Act 2014? Under section 17 of SEPA2014, if a project is launched in Sindh, the professional of Sindh EPA and academic institutions should be taken in consideration for carrying out this exercise and other condition is of WB. 	<ul style="list-style-type: none"> Environmental and Social Consultant of WB explained that this consultation which HESCO is conducting is in response to the requirements of Provincial act as well as a WB requirement. HESCO conducted the consultations earlier and will keep on doing so in future as and when needed in response to Provincial Laws and WB requirements. HESCO plans to conduct an environmental and social assessment in response to the Provincial Act as well as the WB requirement. This consultation is part of the process. The project is going to meet the requirements of Provincial Laws as well as the WB. The SEP will be prepared for the project which will not only report on consultations carried out so far but will also give a road map for future consultations during different phases of the project.

		Sindh Irrigation and Drainage Authority	<ul style="list-style-type: none"> I do not see that there is any social mechanism existing in the HESCO to engage with the communities and get support of the communities for the project. You will need to engage with the communities directly. In this case there will be an element of blackmailing by the communities. The network of HESCO is great and offices are available at subdivision and division levels. It is a suggestion that the project should identify a committee of people of the area where construction activities will be carried out. These local people will help in resolving the social issues during the implementation. 	This suggestion will be considered
		SSF	<ul style="list-style-type: none"> What is level of understanding of the community? The technical terms need to be presented in a very simple form to the community. The questions during focus group discussion should be based on level of understanding of the community. There will be housing, forestry, and industries in the areas of operation of HESCO. All the issues need to be discussed separately with the community and in easy language. 	<ul style="list-style-type: none"> The SEP of the project outlines the modes of communication and frequency of engagement with different stakeholder groups through the life of the project.
4	In terms of engagement with this project, what role do you think your department/institution could play and specifically how can you collaborate during the implementation of the	Professor, Environmental Engineering Department, Quaid-e Awan University, Nawabshah	<ul style="list-style-type: none"> I offer my services regarding conducting consultations and any technical input required for the project. There are some serious issues which need to be taken care during the project. If they are not addressed in the beginning, then many problems related to health and safety, environment and social will erupt out. We can have meetings with HESCO as and when required. 	<ul style="list-style-type: none"> We have noted all your suggestions and the implementation of the SEP will entail regular engagement and coordination among the stakeholder groups.

	E&S management instruments?		<ul style="list-style-type: none"> I also offer my services for baseline studies and impact assessment for the project. 	
		MUET, Jamshoro	<ul style="list-style-type: none"> Our department has the capacity/facility for doing an analysis of water. All kind of analysis could be done here. If there will be any issue of solid waste management and consultations, we can provide our services to guide the project teams. If you need any help, Institute of Environmental Engineering Mehran University is available to provide services. 	<ul style="list-style-type: none"> This is much appreciated and valuable. The project and HESCO will try its best to utilize the available facility and available expertise of your institution.
		SIDA	<ul style="list-style-type: none"> SIDA is extensively engaged with the communities and can provide you services in the areas where your activities will be carried out. You will not be able to establish a large social setup. We are already registered government organization and we will help you in implementation. 	<ul style="list-style-type: none"> HESCO's environmental and social cell will coordinate with SIDA and seek their help as required.
5	How would you like to be consulted and engaged by the project over the next 5 years? What is your preferred mechanism/mode of consultation?	SIDA	<ul style="list-style-type: none"> There should be a centralized system in HESCO where all information should be available. The benefit of it will be that the recoveries, losses and maintenance challenges will be solved. If you will include GIS component (mapping) in it, then it will be easy to identify losses in a specific area by marking it on a map. 	<ul style="list-style-type: none"> Your suggestion is very valid
		SSF	<ul style="list-style-type: none"> There are different tools available to engage with the community. For example, arrange orientation workshop, focus group discussion, seminars, and conferences. We can help the project in organizing consultations in the areas where our organization is working. 	<ul style="list-style-type: none"> The SEP of the project outlines the modes of communication and frequency of engagement with different stakeholder groups through the life of the project.

		SIDA	<ul style="list-style-type: none"> It is a suggestion that the stakeholder forum should be formed. SIDA can share the document with HESCO. 	<ul style="list-style-type: none"> We have noted all your suggestions and the implementation of the SEP will entail regular engagement and coordination among the stakeholder groups
	SSF	<ul style="list-style-type: none"> My suggestion would be that the HESCO should call an introductory meeting of the institutions/NGOs working in the target area of HESCO. In this way, HESCO will be able to know about their areas of work and level of expertise and will engage them in future based on their expertise. They will be able to know about their issues of those areas 		
	Consultant	<ul style="list-style-type: none"> Development of an application which should contain data of different stages of the project. We shall provide you support in implementation. 	<ul style="list-style-type: none"> The engagement will continue through the project life and your suggestion is noted. 	
6	Institutional capacity (especially the government institutions) to perform your roles related to E&S management.	SIDA	<ul style="list-style-type: none"> WAPDA and Irrigation are engineering organizations. Training should be provided to engineering staff on environmental and social aspects. It will help them in understanding the importance of environmental and social aspects. 	<ul style="list-style-type: none"> This is a good suggestion. Training will be provided to all key stakeholders who will be involved in the project
		Quaid e Awam University, Nawabshah	<ul style="list-style-type: none"> We can provide our services to provide trainings to the communities/staff including environmental impact assessment. Our university facility will be available for this purpose. 	<ul style="list-style-type: none"> Thank you ! We will approach you when we need to conduct training on community mobilization.
		MUET, Jamshoro	<ul style="list-style-type: none"> We have capacity to provide trainings in the field of health and safety and can offer our services 	<ul style="list-style-type: none"> Thank you ! We will approach you when we need to conduct training on health and safety.
7	Capacity Strengthening	Muhammad Ibrahim	<ul style="list-style-type: none"> Data should be digitized for readily accessible information 	<ul style="list-style-type: none"> This is a good suggestion

		SIDA	<ul style="list-style-type: none"> • Trainings should be arranged on environmental and social practices. • There should be a special focus on risk management 	<ul style="list-style-type: none"> • The project ESMP will provide a list of trainings and capacity building measures that will be undertaken.
		SIDA	<ul style="list-style-type: none"> • Can you please share the environmental impact assessment and ESMP of the project? • What will be the mechanism of addressing persistent non compliances by the contractor? 	<ul style="list-style-type: none"> • We are in the process of preparing these documents and when completed will be shared with the stakeholders.
		Consultant USAID	<ul style="list-style-type: none"> • My suggestion is that the establishment of a working group on environmental and social framework will be helpful. The project should identify most relevant departments which could contribute on environmental and social aspects. 	
8	Grievance Redressal Mechanism	SIDA	<ul style="list-style-type: none"> • Grievance redressal committee will be developed for this project. Similar type of committee was developed for SIDA. We can share those documents with the HESCO 	<ul style="list-style-type: none"> • The project will have a comprehensive GRM in place which will address complaints at the PMU and field level in a timely and transparent manner.
		Consultant, USAID	<ul style="list-style-type: none"> • Roshan Pakistan App like system should be introduced. HESCO should develop such app and it should be user friendly. 	<ul style="list-style-type: none"> • Noted and concern will be communicated/conveyed to senior management.
9	Any other question/suggestion	SIDA	<ul style="list-style-type: none"> • In WB projects, project employees are involved and some other support staff is also involved who is not part of the actual project. Problems start from these staff because there is no benefit for this staff in the project. MY suggestion would be that there should be some incentive for the support staff in the project. 	

Date of Workshop: 17 June 2021

Time: 11:00 am to 1:00 pm

Consultative Workshop-PESCO

Sr. No	Name of Participant and Organization	Response/Comments from Participants	Response from PESCO
1	Environment Specialist, Dasu Hydropower Project	<ul style="list-style-type: none"> • The environmental impact that you identified included terrestrial habitat alteration, tree cutting and impact on wildlife. Have you done an assessment that how many numbers of trees will be cut and what is program of replantation? • Are there any excavation activities involved in this project? If yes then how will you dispose the spoil material? • Will you involve third party for monitoring of air and noise pollution during construction phase? • Which hazardous material will be used at this project? 	<ul style="list-style-type: none"> • When we cut one tree, we replant three trees. It is our policy. In this project we have selected those location where no tree cutting will be involved. • As we explained that we shall work at the existing facilities of grid stations. The locations where the capacity of transformer is small, we are going to install large capacity transformer or along with that we shall install another transfer. The foundation pads for these transformers are already established. No new construction or excavation will be involved in this project. • As we were discussing that WB has ten standards and the documents which we were preparing e.g ESCP. We record these aspects in these documents. We consulted with grid station staff and communities living near the grid stations and asked about their views regarding noise pollution during work at grid station or during installation of new equipment. They explained that there is such problem of noise due to construction at grid station. Working gang was also consulted and they explained that we carry out our activities during off peak hours so that there should be minimum or no disturbance to the communities. • There is no such use of hazardous material in this project. The hazardous material is only transformer oil. The highly contaminated oil has been excluded/banned from the system and we have included in the bidding document that the mineral oil will be provided for the transformers which will be PCB free. The transformer oil comes in large drums and these drums are reused.

2	British Council	<ul style="list-style-type: none"> • The grid station where the improvements will be done, the old wires will be changed. What is plan for safe disposal of those wires? • The electricity bills are going up and availability of electricity is short. There is frustration among the masses. Will there be any impact of this project on electricity bills? • What will be impact of this project on load shedding? 	<ul style="list-style-type: none"> • The conductors which we are going to replace is collected from the site and comes in main store. We have a disposal directorate. They auction this material and vendors bid in this auction and after winning they take this material. • We are going to ABC cable and bare conductor will be replaced. The rate of fatal incidents is very high due to these bare conductors. The commercial losses and technical losses will be controlled. • We are going to upgrade the system so that the load shedding could be controlled.
3	Deputy Control Officer, University of Swat	<ul style="list-style-type: none"> • I would like to highlight two issues with reference to Swat area. In the hilly areas there are two hazards which hinder the supply of electricity. One is flood while the other is strong winds. The electric transformers which you have installed near river Swat or in other flood areas. Will you also change these transformers in those areas? Have you done any survey in this regard? • Is there any specific package under this project for education and health institutions? Will there be any provision of dedicated transmission lines to these institutions? 	<ul style="list-style-type: none"> • We are currently dealing with the large transmission lines (132 kV). The transmission line which you mentioned is 11 kV transmission line. We have a separate directorate to deal with these lines and its issues. • There are formations which are defined as sensitive and are exempted from the load shedding. Only in case of major faults, there will be load shedding. Education institutes and hospitals are included in it.
4	PA to Speaker KP Assembly	<ul style="list-style-type: none"> • We appreciate your practical approach of upgrading the system. The transformers are very heavy how will you transport these transformers to hilly areas like Malakand division and Hazara division where the load capacity of bridges is less? • Currently you will work on large transmission line, is there any plan to upgrade the small transmission lines which transmit power to villages? 	<ul style="list-style-type: none"> • We construct the grid at those locations where proper access road would be available. The equipment is very precious and we do not plan activities in location where access is not possible. There is a committee which selects the site for construction of grid station. • We are also working on feeders and expansion work is also in progress.

5	SRSP	<ul style="list-style-type: none"> • During construction activities there will be disruption in power supply. Is there any alternate plan for those areas so that the people should not suffer? • There are areas in the province which are very isolated. Is there any provision in the project for those areas so that they can also have an access to electricity? 	<ul style="list-style-type: none"> • In case of long shedding, we issue a schedule and share with the public. Our repair and construction activities are normally carried out in off peak hours. We shall arrange alternate transformers for continuous power supply.
6	Bacha Khan University Charsadda	<ul style="list-style-type: none"> • What is timeframe of completion of this project? • In Charsadda, there is load shedding of 10-12 hours. This university is in a security risk area. Is there any provision of a dedicated line for the university in the project? 	<ul style="list-style-type: none"> • The feeders of Charsadda area are included in the project.
7	Forest Department	<ul style="list-style-type: none"> • The tree cutting should be avoided. The wildlife is disturbed due to cutting of trees. 	<ul style="list-style-type: none"> • We have noted your point and will be incorporated in the report.
8	WWF	<ul style="list-style-type: none"> • You explained that trees will be replanted with 1:3. There are forest trees which take years to grow. If we replant two to three trees as an alternate of large grown trees. Will it be a good alternate? • If we talk natural disaster in Chitral area, there will be GLOFs, avalanches, floods, landslides and earthquakes. We cannot avoid the impacts of natural disasters on the transmission lines. • The labour who will be expired during the construction activities. What are provisions in the project for such labour? 	<ul style="list-style-type: none"> • The ten standards of WB are above the national law. Labour management procedures will be prepared and all labour issues will be covered in this document. Special clauses in the contract will be added in the contract. The contractor will implement those measures and DISCO will monitor the implementation. • We are going to upgrade existing grids and no tree cutting will be involved in it.
9	SADO, Lower Dir	<ul style="list-style-type: none"> • When the transformer of an area becomes out of order, the people of community arrange the repair by themselves. There should be mechanism that in case of damage there should be provision of alternate transformer 	<ul style="list-style-type: none"> • We have noted your comments.

		to that community so that there should be no disruption of power.	
10	WWF	<ul style="list-style-type: none"> The themes on which WWF is working, we can provide you technical input on those themes/aspects. We can tell you about the type of trees in different areas of KP, damage on tress, alternate plantation, impact on wildlife and impact of climate change. 	<ul style="list-style-type: none"> The project will engage with different stakeholders and seek their input on a regular basis.
11	WWF	<ul style="list-style-type: none"> If the project requires an input from WWF, we can provide our input in written form. We can visit the sites and also can conduct meetings. 	Same as above
12	SADO, Lower Dir	<ul style="list-style-type: none"> We have local organizations in different areas and you can engage our organizations in your project to resolve the issues of the communities. We can help you in areas of disaster management, community engagement, advocacy. We shall be willing to participate in workshops/trainings arranged by the project. 	Same as above