

**PHYSICAL AND CULTURAL RESOURCE MANAGEMENT PLAN  
(PCRMP)**



**CONSERVATION AND PRESERVATION WORKS OF JAMAL  
GARRHI ARCHAEOLOGICAL SITE IN DISTRICT MARDAN KHYBER  
PAKHTUNKHWA**

**KHYBER PAKHTUNKHWA INTEGRATED TOURISM DEVELOPMENT  
PROJECT- PROJECT MANAGEMENT UNIT DEPARTMENT OF  
TOURISM**

**(KITE - PMU DoT)**

**FEBRURARY, 2024**

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## **LIST OF ACRONYMS**

AoI	Area of Influence
DoAM	Directorate of Archaeology and Museum
EHS	Environmental Health and Safety
EIA	Environmental Impact Assessment
EPA	Environmental Protection Agency
EPAs	Environmental Protection Agencies
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
GoKP	Government of Khyber Pakhtunkhwa
GoP	Government of Pakistan
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
KITE	Khyber Pakhtunkhwa Integrated Tourism Project
KP	Khyber Pakhtunkhwa
M&E	Monitoring and Evaluation
MEC	Monitoring and Evaluation Consultant
NEQS	National Environmental Quality Standards
NGOs	Non-Government Organizations
NOC	No-Objection Certificate
O&M	Operation and Maintenance
OP	Operational policy
PCR	Physical Cultural Resource
PCRMP	Physical Cultural Resource Management Plan
PEPA	Pakistan Environmental Protection Act
PMU	Project Management Unit
PPE	Personal Protective Equipment
SDGS	Sustainable Development Goals
WB	World Bank
WBGEHSG	World Bank Group Environmental Health and Safety Guidelines
WHO	World Health Organization

## **EXECUTIVE SUMMARY**

Department of Tourism (DoT) through Government of Khyber Pakhtunkhwa (GoKP) is implementing the Khyber Pakhtunkhwa Integrated Tourism Development (KITE)<sup>1</sup> Project. One of the main objectives of KITE is to promote and develop cultural and religious tourism. Therefore, the initiative to preserve the Physical Cultural Resources (PCRs)<sup>2</sup> / archaeological sites and to make these sites cultural and religious tourism attraction is undertaken. In connection to this Jamal Garrhi Site has been selected for conservation<sup>3</sup> and preservation<sup>4</sup>, thus OP 4.11 is triggered that requires the preparation of Physical and Cultural Resource Management Plan (PCRMP). In line with the prevailing legislation in the country (national/provincial laws) and World Bank safeguard policies, an environmental and social assessment of Jamal Garrhi site<sup>5</sup> (PCR/Archaeological site) has been carried out and the present PCRMP has been prepared, following the guidelines provided in the Environmental and Social Management Framework (ESMF)<sup>6</sup>. The implementing agency for the proposed sub-project is PMU-DoT KITE. This PCRMP identifies the potential negative impacts of the initiative, and proposes appropriate mitigation measures to reduce if not eliminate these impacts.

The archaeological site of Jamal Garrhi is an ancient site located 14 Kilometers from Mardan City in KP Pakistan. There is a stone pitched access road that connects the site from provincial road. The road goes up to the height of 1400 feet where the remains of the archaeological site can be seen. The distance between the site and residential settlements is also more than 1400 feet. During the 2022 floods in Pakistan, the boundary walls of conference hall, base of the stupas and chapels have been affected. The following activities shall be carried out at sub-project site during the implementation of proposed sub-project: Conservation and preservation of boundary walls, chapels and foundations of main walls to avoid collapses.

This PCRMP has been prepared to address the requirements detailed in the World Bank Operational Policies (OPs) addressing environmental and social aspects and considerations. The applicable OPs are OP 4.01 (Environmental Assessment) and OP 4.11 (Physical Cultural Resources). The project has been categorized as Category B at design. In addition, the PCRMP addresses the requirements defined in the national and provincial regulations, most importantly, *The Khyber Pakhtunkhwa Environmental Protection Act 2014* and Khyber Pakhtunkhwa Antiquities (Amendment) Act, 2020.

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<sup>1</sup> According to the World Bank Operational Policy OP 4.01 'Environmental Assessment' the proposed project falls under Category 'B'

<sup>2</sup> PCRs are defined as movable or immovable objects, sites, structures, groups of structures and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic or other cultural significance. PCRs may be located in urban or rural settings and may be above or below ground or under water.

<sup>3</sup> involves active intervention and management strategies aimed at preventing decay, damage, or loss of cultural heritage while allowing for appropriate and minimal changes necessary for sustainable use or longevity. Within the context of the PCRMP, conservation would encompass activities like the careful removal of fragile stone work and the replacement of stones in the old Gandhara style, ensuring the preservation of historical elements while maintaining their authenticity.

<sup>4</sup> Refers to the careful and non-invasive maintenance of the existing condition of cultural or historical artifacts, structures, or sites. In the context of the Archaeological Site Thareli, preservation would involve safeguarding the integrity of the main stupa court, votive stupa, Base, Dome, harmika, Drums of stupas, main assembly hall, and monasteries through measures that prevent further deterioration or damage without significant alteration to their original state.

<sup>5</sup> Named as sub-project in this document

<sup>6</sup> Environmental and social management framework, April 2020

The E&S team conducted extensive community consultations across near sub-project location. Focus Group Discussions (FGDs) were held with 21 members including 17 males and 4 females. Institutional consultations involved various government authorities such as the Environmental Protection Agency, Directorate of Archaeology and Museums, Local government Nazim and Non-Governmental Organization (NGO). The consultative sessions were conducted on 22<sup>nd</sup> March, 2023 and 22<sup>nd</sup> December, 2023. The PMU provided responses to the stakeholders during these consultation meetings and made part of this report. The sub-project will also have grievance Redress Mechanism (GRM), providing stakeholders with a way to submit their concerns.

The potential environmental and social risks for sub-project include: inappropriate design and planning; chance of finding PCRs during excavation; minor demolition to PCRs; accidental damages to PCRs; waste generation; dust emissions; health and safety; forced and child labor etc. Most of the above-stated risks and impacts are temporary site-specific and manageable by adopting mitigation measures provided in this PCRMP, in accordance with the mitigation hierarchy.

The Project Director-PMU KITE DoT, through E&S experts of PMU and Focal Person of DoAM at field level, will be responsible for the overall implementation of PCRMP. Contractors will be required to comply with the E&S requirements provided in PCRMP. This provision will be specified in the contractor's agreements. Monitoring will be carried out to ensure that the mitigation measures are regularly and effectively implemented. It will be performed at PMU, field level (by DoAM) and by the Contractor. The PMU-DoT will be responsible for reporting on the implementation of the PCRMP to the World Bank on quarterly basis. The E&S Experts of the PMU, upon completion of the sub-project, will monitor activities with regard to site restoration to ensure that the activities are done to an appropriate and acceptable standard before closing the contracts, in accordance with measures identified in the PCRMP. The estimated cost of PCRMP implementation is 1.8 million. The Contractor however shall be paid against the actual execution with evidential proof of relevant PCRMP activity.

## **1. INTRODUCTION**

Department of Tourism (DoT) through Government of Khyber Pakhtunkhwa (GoKP) is implementing the Khyber Pakhtunkhwa Integrated Tourism Development (KITE)<sup>7</sup> Project. One of the main objectives of KITE is to promote and develop cultural and religious tourism. Therefore, the initiative to conserve and preserve the Physical Cultural Resources (PCRs)<sup>8</sup> / archaeological sites and to make these sites cultural and religious tourism attraction is undertaken.

In connection to this Jamal Garrhi Site has been selected for conservation, preservation and developmental works, thus OP 4.11 is triggered that requires the preparation of Physical and Cultural Resource Management Plan (PCRMP).

In line with the prevailing legislation in the country (national/provincial laws) and World Bank safeguard policies, an environmental and social assessment of Jamal Garrhi site<sup>9</sup> (PCR/Archaeological site) has been carried out and the present PCRMP has been prepared, following the guidelines provided in the Environmental and Social Management Framework (ESMF)<sup>10</sup>. The implementing agency for the proposed sub-project is PMU-DoT KITE.

This PCRMP identifies the potential negative impacts of the initiative, and proposes appropriate mitigation measures to reduce if not eliminate these impacts. The PCRMP also defines the environmental and social monitoring requirements as well as capacity building arrangements, to ensure that the Plan is effectively implemented.

### **1.1 BACKGROUND**

Tourism is an important contributor to KP's economy and job creation, and the number of domestic tourists traveling to KP keeps growing rapidly. KP is blessed with diverse tourism attractions, catering to all interest types. KP's rising value in the tourism sector is also evident from the fact that its expenditure in tourism sector rose from Rs. 86.23 million in the financial year 2012-13 to Rs. 791 million in financial year 2018-19. The increased tourism promotion has led to an unprecedented rise in tourist traffic in the province, resulting in growth in economic activity in the province and the creation of new employment opportunities for the local population.

The GoKP has received loan from International Development Association (administered by the World Bank) towards the KITE. The KITE project aims to enhance under-utilized potential of KP's tourism sector for generating income and revenues, by providing an

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<sup>7</sup> According to the World Bank Operational Policy OP 4.01 'Environmental Assessment' the proposed project falls under Category 'B'

<sup>8</sup> PCRs are defined as movable or immovable objects, sites, structures, groups of structures and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic or other cultural significance. PCRs may be located in urban or rural settings and may be above or below ground or under water.

<sup>9</sup> Named as sub-project in this document

<sup>10</sup> Environmental and social management framework, April 2020

enhanced tourism experience to domestic and international tourists, while focusing on preservation of environment, wildlife, culture and heritage.

## **1.2 OBJECTIVES OF PCRMP**

The main objectives of this PCRMP are: assess the existing conditions of the sub-project area; identify potential impacts of the proposed sub-project on the physical, ecological and social aspects, to predict and evaluate these impacts and determine their significance; To provide practical and implementable actions for the Contractor to follow, to avoid, mitigate, remedy, offset or compensate for likely impacts or damages to PCR; To Protect from the adverse impact(s) of the proposed sub-project and support conservation, preservation and civil works; To propose appropriate mitigation measures that should be incorporated in the design of the sub-project to avoid or minimize if not eliminate the impacts, and to implement during sub-project implementation; To assess the compliance status of the proposed activities with respect to the national/provincial environmental legislation and WB's applicable OPs; provide institutional, monitoring, reporting and documentation measures for environmental safeguards compliance; and aid decision makers to take informed decisions (where applicable).

## **1.3 PCRMP PREPARATION METHODOLOGY**

- Review of sub-project details and description to understand sub-project activities.
- Review of relevant legislations, policies, standards and guidelines to determine the policy, legal and institutional environment for the sub-project based on World Bank OPs, national and provisional level.
- Review of secondary literature to understand sub-project area, primary available data, sample safeguard documents to guide this assessment;
- Conducting consultation with sub-project stakeholders.
- Scoping, screening and impact assessment while developing interaction between sub-sub-project activities and key environmental aspects to screen out the significance of adverse environmental, biological and social impacts and proposing mitigation measures.
- Procedures for environmental and social management, to manage and monitor the environmental and social aspects of the sub-project.
- Estimation of budget to ensure the effective implementation of all the mitigation measures/ actions proposed in the PCRMP.

## **2. DESCRIPTION OF SUB-PROJECT**

### **2.1. SUB-PROJECT OBJECTIVE**

The sub-project development objective is to improve tourism-enabling infrastructure, enhance tourism assets and strengthen destination management for sustainable tourism development in Khyber Pakhtunkhwa.

### **2.2. LOCATION AND ACCESSIBILITY OF THE SUB-PROJECT AREA**

Jamal Garrhi is an ancient site located 14 Kilometers from Mardan City in KP Pakistan. The site coordinates are 34.320443° 72.069019°. There is a stone pitched access road that connects the site from provincial road.

### **2.3. DESCRIPTION OF ARCHAEOLOGICAL SITE**

#### **2.3.1. Conservation and Preservation of Archaeological Site Jamal Garrhi**

The structural remains of this site represent Buddhist settlement. The most important of the remains of this monastic complex is the main circular stupa surrounded by chapels, middle and lower votive stupa courts also surrounded by chapels, an assembly hall, vaulted chambers and secular buildings with open courtyard see **Error! Reference source not found.** The floods in 2022 have damaged the Buddhist monastery and circular stupa. One of the main walls were also affected. The current floods have damaged the Buddhist monastery and circular stupa. The following section will provide the details of the activities in the sub-project at Jamal Garrhi Mardan.

### **2.3.2. Sub-project activities**

Conservation and preservation of boundary walls, chapels and foundations of main walls to avoid collapses.

**Conservation:** involves active intervention and management strategies aimed at preventing decay, damage, or loss of cultural heritage while allowing for appropriate and minimal changes necessary for sustainable use or longevity. Within the context of the PCRMP, conservation would encompass activities like the careful removal of fragile stone work and the replacement of stones in the old Gandhara style, ensuring the preservation of historical elements while maintaining their authenticity.

**Preservation:** Refers to the careful and non-invasive maintenance of the existing condition

**Figure 2-1: Buddhis remains at Jamal Garrhi**

of cultural or historical artifacts, structures, or sites. In the context of the Archaeological Site Jamal Garrhi, preservation would involve safeguarding the integrity of the main stupa court, votive stupa, Base, Dome, harmika, Drums of stupas, main assembly hall, and monasteries through measures that prevent further deterioration or damage without significant alteration to their original state.



## **2.4. METHODOLOGY/ PROCEDURES FOR CONSERVATION/CIVIL WORKS**

General considerations /protocols / SOPs for conservation/civil works at Jamal Garrhi site are:

### ***Pre- Conservation/Civil Work***

- The conservation intervention needs to follow a logical procedure. This starts with visual assessment and compilation of relevant historical data/information available including in recent history & information on any previous conservation interventions. Analytical techniques for investigation may be applied, if necessary, in order to study other aspects of the object;
- A diagnosis as to the state of conservation of the object is required. For instance, soundness and various causes of deterioration. The results from analysis serves various purposes. The most appropriate method and material need to be determined;
- Before execution of conservation work careful inquiries should be made regarding supplies of sand, bricks, stone, lime and other material etc. in the immediate neighbourhood. Samples of which shall be checked and approval shall be taken from archaeological engineer;
- Where it is necessary to introduce new pillar or new masonry in order to support the mass of rock, the archaeological officer must furnish measured plans and drawing showing the precise position and detail of new pillars or masonry, in all such works care must be taken that the new stone work may match in texture and colour and may be dressed in the same ways the face of the rock immediately joining;
- Preparing necessary drawings and photographs, highlighting the PCR areas/elements to be conserved, before starting the works;

### ***During Conservation/Civil Work***

- The officer in charge of the execution of conservation works should never forget that the reparation of any remnant of ancient architecture, however humble, is a work to be done with totally different feeling from a new work. It should be kept in mind that the aim is to preserve not to renew them. Therefore, no effort should be spared to save as many parts of the original as possible. Broken or half decayed original work is of infinitely more value than the smartest and perfect new work;
- The Conservation activities shall be carried out by pre-qualified trained Contractor under supervision of technical staff of DoAM. The Contractors shall contain team of skilled labours having past experience in similar works;
- Conservation supervisor shall watch the operation and provide necessary guidance. Conservation supervisor shall inform DoAM about the progress of work and if any difficulty arises;
- An archaeologist from the DoAM must be present whenever excavations are carried out in or around the PCRs, in case of discovery of any immovable antiquity during execution of work, he shall take charge and register it to further inform higher ups. Secure the site to prevent any damage or loss to movable objects;

- All excavations are to be carried out with great care in order that any old masonry or other remains buried in the earth may not be damaged., any such remain should be left untouched when found and if liable to weather decay, it should be covered;
- The conservation personnel should carefully strut up or support any overhanging pieces of masonry. Decayed arches should be properly centred up, if in an unstable condition. Any wall which is in a dangerous state, and are liable to fall down, must be properly shored up with raking shores, needles, plates etc. as per instruction of Engineer in charge;
- As a rule, the lime is soaked in water in trough at evening time and is mixed and used on the day following, but if required for immediate use, it should be passed wet through a mortar mill for at least 2 hours before use;
- Lime mortar of which tensile strength is less than 100lbs. per square inch is not to be used in conservation work. A practical and quick way of testing it on site is to take a handful of mortar from the trough and after minute or two wash it off the hand, if the skin is left rough after washing, the mortar may be considered fit for use;
- When dismantling masonry, previous to re-building, it may be necessary to mark or number the old stones so as to readily replace them in original position. The numbering should be made in such a way that it is removable again;
- The restoration of plaster stucco on walls and ceiling is rarely admissible and is to be carried out only under instruction from archaeological engineer. Broken damaged or lose plaster may be preserved with the help of lime grout or in some cases of plaster of Paris injected into the hollow cavities behind the loose plaster and by applying a neat fillet of lime mortar round the broken edges, care being taken that the cavities and edges are washed clean with water;
- Visitors should not be allowed near those portions of building where work of preservation is in progress, and in some cases the building should be completely closed to the public. The site shall be cordoned off within and the site attendants must inform the people regarding the no go area. The work in progress sign boards should be placed;
- The labor working shall be provided with training sessions to sensitize them about the importance of antiquities, and ensure general safety measures;
- The training shall include the topics, such as chance find procedures and their protocols and other risks and their mitigation measures;
- During conservation and preservation of Archaeological site(s) the premises In-charge shall take all the safety measures and keep his/her staff vigilant to avoid any unforeseen event.

### ***Post Conservation & preservation/Civil Work***

- Proper provision is to be made for drainage, especially for taking off flood water after heavy rain. Water must not be allowed to stand in pools or ditches near PCR;

## **2.4. SUB-PROJECT IMPLEMENTATION SCHEDULE**

The tentative implementation period is Twenty-four (24) months.

### 3. LEGAL AND ADMINISTRATIVE FRAMEWORK

This section deals with the current legal and administrative framework required to prepare the PCRMP of the proposed sub-project and the Implementing Agency will be required to comply with local and World Bank requirements.

#### 3.1. APPLICABILITY OF WORLD BANK SAFEGUARD POLICIES

A summary of the World Bank safeguard policies and their relevance to the proposed sub-project are provided in the **Table 3-1** below:

**Table 3-1: Applicability of World Bank Policies**

Sr. No.	WB Safeguard Policies	Triggered		Relevance to Sub-project
		Yes	No	
1.	The World Bank OP 4.01 Environmental Assessment	[√]	[ ]	This OP requires Environmental Assessment (EA) to be conducted of projects proposed for Bank financing to help ensure that they are environmentally sound and sustainable with an objective to improve decision making process. The present PCRMP has been developed in response to this OP. The sub-project activities may potentially have adverse E&S impacts during implementation, though these impacts are site-specific and can be eliminated/controlled/reduced by implementing properly designed mitigation measures provided in this PCRMP.
2.	The World Bank OP 4.04 Natural Habitats	[ ]	[√]	This policy seeks the conservation of natural habitats for long-term sustainable development. It supports the protection, maintenance, and rehabilitation of natural habitats and requires a precautionary approach to natural resource management to ensure opportunities for environmentally sustainable development. The activities under the proposed sub-project are not likely to affect the natural habitat, therefore this OP is not triggered.
3.	The World Bank OP 4.09 Pest Management	[ ]	[√]	Through this OP, WB supports a strategy that promotes the use of biological or environmental pest control methods and reduced reliance on synthetic chemical pesticides. This OP is not triggered since the proposed sub-project will not involve the use of pesticides.
4.	The World Bank OP 4.10 Indigenous Peoples	[ ]	[√]	The OP defines the process to be followed if the project affects indigenous people. This OP is not triggered as no Indigenous Peoples present in the sub-project area.

Sr. No.	WB Safeguard Policies	Triggered		Relevance to Sub-project
		Yes	No	
5.	The World Bank OP 4.11 Physical Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	This policy safeguards archaeological, physical or cultural heritage sites and assists in their preservation, and avoids their elimination. This OP 4.11 is triggered as the proposed conservation, preservation and development works will be carried out in or around the Jamal Garrhi site (PCR / archaeological site).
6.	The World Bank OP 4.12 Involuntary Resettlement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Involuntary Resettlement covers direct economic and social impacts that results from land acquisition for project development, relocation or loss of shelter, loss of assets or access to assets, and loss of income sources or means of livelihood. This OP is not triggered as sub-project interventions will not require land from public or private land holders.
7.	The World Bank OP 4.36 Forests	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The objective of this policy is to assist borrowers to harness the potential of forests to reduce poverty in a sustainable manner, integrate forests effectively into sustainable economic development. The activities under the proposed sub-project are not likely to affect the forest resources, therefore this OP is not triggered.
8.	The World Bank OP 4.37 Safety of Dams	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The Policy seeks to ensure that appropriate measures are taken and sufficient resources provided for the safety of dams the WB finances. This OP is not triggered since the proposed sub-project does not involve construction of dams.
9.	The World Bank OP 7.50 Projects on International Waterways	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This OP defines the procedure to be followed for projects the WB finances that are located on any water body that forms a boundary between, or flows through two or more states. This OP is not triggered since the proposed sub-project interventions are not located on international waterways
10.	The World Bank OP 7.60 Projects in Disputed Areas	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This OP defines the procedure to be followed for projects the WB finances that are located on any disputed and conflict areas. This OP is not triggered since the proposed sub-project interventions are not located on any disputed and conflicting area.

### 3.2. KEY NATIONAL AND PROVINCIAL LAWS, REGULATIONS AND POLICIES

This PCRMP will also look into the requirements local (national and provincial) regulations and policies, particularly, Khyber Pakhtunkhwa Environmental Protection Act 2014, Khyber Pakhtunkhwa Antiquities (Amendment) Act, 2020, Khyber Pakhtunkhwa Occupational Health and Safety Act, 2022 and The Khyber Pakhtunkhwa Prohibition of Employment of Child Act, 2015.

## **4. STAKEHOLDERS CONSULTATION**

The consultation and information disclosure to the stakeholders during sub-project planning, designing and implementation stages is a key to sustainable development. Likewise, participation of stakeholders at all stages of sub-project preparation is essential to meet the objectives of meaningful consultation. During the preparation of the PCRMP, stakeholders from different walks of life were consulted to learn about their concerns and adopt appropriate measures in sub-project design and implementation and disseminate requisite information about sub-project's likely impacts on PCRs, environment and social aspects.

### **4.1. OBJECTIVES OF CONSULTATION**

Specific objectives of the public consultations are as follows:

- To share fully the information with the affected people about the proposed sub-project, components and activities, latest interventions in the sub-project development;
- To identify possible social impacts during the conservation, preservation and developmental civil works of the sub-project;
- To obtain the co-operation and participation of the stakeholders in the planning and implementation process;
- To ensure transparency in all the sub-project activities through sharing the information;
- Increase public confidence about the proponent, reviewers and decision makers; and
- The guiding principle underlying consultations is that social safeguard planning and implementation must follow a consultative and participatory process to ensure success of the sub-project.

### **4.2. STAKEHOLDERS CONSULTED**

The E&S team conducted extensive community consultations around sub-project area. Focus Group Discussions (FGDs) were held with 21 members including 17 males and 4 females. Institutional consultations involved government authorities such as the Environmental Protection Agency, Directorate of Archaeology and Museums, Local government Nazim and Non-Governmental Organization (NGO). The consultative sessions were conducted on 22<sup>nd</sup> March, 2023 and 22<sup>nd</sup> December, 2023.

The, participants were first briefed about the proposed activities associated with the subproject implementation and sensitized on the importance of heritage site. Afterwards, participants were asked to express their views regarding the proposed subproject. In general, participants, appreciated the subproject and presented concerns and suggestions.

The concerns and suggestions raised by the stakeholders were considered in developing the PCRMP document. During the meetings, locals were sensitized on the importance of heritage sites and their environmental and social aspects. The details of the participants stakeholders consulted and pictures pictorial evidence are provided in this document in Annex VI.

### 4.3. CONCERNS RAISED DURING THE CONSULTATION MEETINGS AND THEIR RESPONSES

The concerns raised and suggestions made by the participants during consultation meetings have been provide in the Table II below

**Table 4-1 Concerns/suggestions during Consultation Sessions and their Response**

Sr.No.	Concerns/suggestions	Response
1.	There is shortage of water for drinking and washing on site.	DoAM informed the consultant about upgrading the water pump in next development phase.
2.	The washrooms are available but they are not for general visitors because of shortage of water.	DoAM is acquiring 5 Hp pump that will resolve the water related concerns in next development phase.
3.	The fence is provided on the entrance only, the visitor roam around and disturb the privacy of the locals residing at the downstream.	The site attendants guide the visitors to avoid standing on village side to ensure the privacy of the residents.
4.	Waste produced by visitors.	There are waste bins available on different locations at the site with proper waste management.
5.	There were suggestions to illuminate the site for night tourism	DoAM informed that illumination of this site is in process.

### 4.4. GRIEVANCES REDRESS MECHANISM

The grievance Redress Mechanism (GRM) is an institutional mechanism that provides the sub-project's stakeholders with a way to submit their concerns. When a grievance arises, the complainant (affected person/s or stakeholders) may directly contact the Project Management Unit (PMU) through either registering a complaint/s via Complaint Register Book at the PMU offices, Tourist Facilitation Hub, respective sub-project sites or through filling the online grievance form available at website i.e. [www.kptourism.com](http://www.kptourism.com), or by calling the Tourism Helpline 1422. After receiving the complaint, the PMU will acknowledge it within five working days. KITE developed GRM pamphlets that would be widely disseminated and available at all sites to facilitate the compliant registration process. The grievance redress mechanism will focus on the following process during the implementation:

- Record grievances, both written and oral, categorizing and prioritizing them, and providing solutions within an agreed timeframe;
- Reporting to the aggrieved parties about the resolutions regarding their grievances and the decision;
- Dissemination of various reporting channels such as complaint boxes, help desk with phone numbers, online complaint registration and proformas for complaints.
- All information about grievance procedures, grievance forms, and responses will be available in languages readily understandable to the locals.
- It is imperative to counsel the contractor's labor regarding GRM for them as well. All the labor shall have the access to the GRM boxes where they can submit their concerns if any.

- GRM dissemination will be carried out on all sub-project sites frequently for local community and labour.

#### **4.4.1. Composition of GRC**

The KITE PMU has developed a Grievance Redress Mechanism (GRM) at its PMU level and a Grievance Redressal Committee (GRC) has been formed. This GRC is accessible to sub-project affected persons and tourists and comprises the following members:

- |  |           |
|--|-----------|
| • Project Director PMU DoT                                     | Chairman  |
| • Environment and Social safeguard specialist PMU DoT          | Secretary |
| • Co-opted Member/s of Relevant Government Departments         | Member    |
| • Invited Members (e.g., Complainant, concerned local citizen) | Member    |

#### **4.4.2. Working Arrangements**

Within seven days a GRC meeting will be held at the PMU or any other location agreed by the Committee by its secretary. If needed GRC members will verify and review the issues or reported complaint. The GRC resolve the complaint by involving the relevant parties. If the affected person is not satisfied with the decision of GRC at PMU, then it can be referred to the Project Steering Committee (PSC) for resolution. The PSC shall resolve it within 14 working days. The complainant's acceptance/non-acceptance shall be in writing. The complainant may also seek redress through courts or other mechanisms available in case of non-acceptance.

## 5. POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES FOR PCRS

This chapter identifies the potential environmental and social risks and impacts envisaged due to the implementation of proposed sub-project. The appropriate mitigation and remedial measures of each environmental and social impact are proposed in this chapter keeping in view the mitigation hierarchy. Most of the above-stated risks and impacts are temporary site-specific and manageable by adopting mitigation measures provided in this PCRMP.

Potential positive impacts are anticipated from the sub-project activities such as increased potential of tourism and socioeconomic benefit to the local community. However, potential adverse impacts envisaged from the implementation of the proposed Sub-project along with their proposed remedial or mitigation measures are detailed in **Table 5-1**. The area of influence for the archaeological site is taken as 100 m from the centre for the impact assessment.

**Table 5-1 Environmental and Social Risks and Mitigation Measures**

Sr. No.	Environmental and Social Impacts	Mitigation Measures
1.	<p><b>Technical Design and Layout planning:</b> Incompatible layout plan, engineering design and improper repair methods of the sub-project's structures can undermine the historical value of PCRs, overall aesthetic beauty and ambience of the sub-project areas. This impact is permanent and moderate adverse in nature.</p>	<ul style="list-style-type: none"> <li>• The technical design of the proposed sub-projects must incorporate the historical and aesthetic considerations meeting the local context and best international practices;</li> <li>• The PMU DoT in consultation with DoAM (where required) must review and validate all the design and repair works considering the possible impacts (as before the start of conservation, preservation and allied civil works);</li> <li>• After a competitive bidding process ,only shortlisted/pre-qualified contractors shall be hired for conservation, preservation and civil works; and</li> <li>• Sub-project activities shall consider the flooding aspects where applicable.</li> </ul>
2.	<p><b>Excavation of Earth:</b> During excavation process, there is a chance of finding PCRs remains. Mismanagement of the PCRs remains may result loss of a valuable asset. This impact is moderate adverse in nature.</p>	<ul style="list-style-type: none"> <li>• In case of finding PCRs remains during excavation, the Contractor shall immediately report through Supervision Consultant to Directorate of Archaeology and Museums, KP to take further suitable action to preserve those PCRs or sensitive remains;</li> <li>• Ensure the compliance with the Khyber Pakhtunkhwa Antiquities Act, 2016/ procedures provided in this PCRMP. Chance finds procedure is given in Annex- VI must be followed;</li> <li>• Contractor needs to obtain approval for excavation and rehabilitate the site upon completion of work; and</li> <li>• Contractors and workers shall be</li> </ul>

Sr. No.	Environmental and Social Impacts	Mitigation Measures
		advised of the penalties associated with the unlawful removal of cultural, historical, archaeological or paleontological artefacts.
	<p><b>Minor Demolition:</b> Minor demolition activities might be harmful for other parts of the PCR. This significance of this impact is low to medium.</p>	<ul style="list-style-type: none"> <li>• Avoid extensive demolition works near or within the PCRs;</li> <li>• Ensure training and awareness sessions for the labour; and</li> <li>• Experienced skilful personnel shall be hired for conducting the demolition activities.</li> </ul>
	<p><b>Accidental Damages:</b> Accidental damages may occur during the implementation of sub-project. This impact is usually caused by lack of technical capacity of the Contractor or caused by human error. This impact is moderate adverse in nature.</p>	<ul style="list-style-type: none"> <li>• Ensure the training and awareness sessions by E&amp;S team of PMU and DoAM on PCRMP to the Contractor and workers;</li> <li>• Ensure the provision of relevant signs for the protection of PCRs where required;</li> <li>• Develop protocols for salvage in consultation with the DoAM and ensure these are included in Contractor's Site Specific PCRMP prepared with the support/ consent of E&amp;S Specialists of PMU;</li> <li>• Avoid the use of heavy machinery/equipment during the excavation; and</li> <li>• The Contractor staff must have relevant qualification and experience of similar projects.</li> </ul>
	<p><b>Waste Generation:</b> Waste including municipal waste and construction waste such as bricks, stones, concrete and spoil waste from excavation may be generated. Minor oil/fuel spillage from electricity backup generator may also occur. Improper disposal of the wastes (solid and liquid) may result in choking of water channels and contamination of soil. Heaps of wastes containing garbage and food waste may serve as breeding grounds for the disease spreading vectors and rodents. This impact is moderate adverse in nature.</p>	<ul style="list-style-type: none"> <li>• Waste generated during conservation preservation and civil works shall be safely disposed in demarcated waste disposal site to avoid water and soil contamination;</li> <li>• Training of work force in the storage and handling of materials and wastes.</li> <li>• Burning of waste material shall not be allowed;</li> <li>• Ensure immediate collection of spilled oils/fuels/lubricants.;</li> <li>• Leftover of materials shall be reused where applicable;</li> <li>• Ensure no leftover waste shall be unattended upon completion of work;</li> <li>• Regular monitoring shall be carried out; and</li> <li>• Resource conservation themes to be included in awareness raising and training sessions for workers and project staff.</li> </ul>
	<p><b>Air quality and Noise generation:</b> Since the sub-project involve small scale conservation &amp; preservation/civil works activities, therefore no major impact of air and noise is anticipated. However, movement of vehicles during material transportation storage of</p>	<ul style="list-style-type: none"> <li>• All dust raising locations shall be kept wet with water sprinkling. Fugitive dust emissions will be minimized by appropriate methods such as spraying water on material where required and appropriate;</li> </ul>

Sr. No.	Environmental and Social Impacts	Mitigation Measures
	materials, excavation activities, site clearance and use of generator may cause minor decline in air quality and generate noise. This significance of this impact is low.	<ul style="list-style-type: none"> <li>• Ensure the compliance with NEQS/IFC/WHO guidelines when and where applicable as per advice of the E&amp;S expert of PMU;</li> <li>• Construction materials will be stored away from the residential areas and will be properly covered;</li> <li>• Construction machinery, generators and vehicles will be kept in good working condition and properly tuned, in order to minimize the exhaust emissions.</li> <li>• Construction vehicles carrying materials will be covered with tarpaulin sheets to avoid spilling;</li> <li>• Vehicle speeds will be kept low, and horns will not be used while passing through or near the communities; and</li> <li>• Vehicles shall have exhaust silencers to minimize noise generation.</li> </ul>
	<p><b>Flora and Fauna:</b></p> <p>No major impact on biodiversity is anticipated and all activities shall be carried out within the existing environment. However, the contractor workers may damage and cut ornamental plants and shrubs or trees for their fuel requirements and may involve in hunting and trapping activities. The movement vehicles may also cause accidental killing of reptiles and mammals. This significance of this impact is low.</p>	<ul style="list-style-type: none"> <li>• Clearing of natural vegetation will be minimized as far as possible.</li> <li>• If a tree is cut, compensatory tree plantation (ten saplings for each lost tree) shall be carried out.</li> <li>• The construction crew will be provided with LPG as cooking (and heating, if required) fuel. Use of fuel wood will not be allowed.</li> <li>• Garbage will not be left in the open.</li> <li>• The sub-project staff shall not be allowed to indulge in any hunting or trapping activities; and</li> <li>• The speed of vehicles shall be kept low to avoid accidental killings of reptiles and mammals. If there is any specie and habitat found of particular concern, the Wildlife department should be informed to take care of assets.</li> </ul>
	<p><b>Occupational Health and Safety:</b></p> <p>Occupational Health and Safety (OHS) related risks may arise such as work at height, excavation, steel fixing, scaffolding and shuttering and concrete pouring, and the movement of sub-project vehicles, GBV/SEA/SH, child and forced labor, lack of compliance with OHS rules and regulations, bad housekeeping and incident and accidents.</p>	<ul style="list-style-type: none"> <li>• The Contractor will be required to strictly follow The khyber pakhtunkhwa occupational safety and health act, 2022 and World Bank Group EHS Guidelines, 2007;</li> <li>• Ensure that the site will be restricted for the entry of irrelevant people particularly children, disabled and elderly peoples. Ensure the use of safety signs at the construction site;</li> <li>• Ensure the provision of fire prevention and firefighting equipment;</li> <li>• Ensure the provision of PPEs to all workers;</li> <li>• Training of workers in construction safety procedures, use of PPEs, defensive driving, provision of first aid, GRM, GBV/SEA/SH, communicable</li> </ul>

Sr. No.	Environmental and Social Impacts	Mitigation Measures
		<p>diseases, emergency response procedures;</p> <ul style="list-style-type: none"> <li>• Ensure effective implementation of GRM to timely address the issues;</li> <li>• No water pond (for lime mortar preparation) shall be left unattended causing breeding of mosquitos and other water borne diseases;</li> <li>• Include procedures for documenting and reporting accidents, diseases, and incidents (incident/accident form attached as Annex IV). Develop and implement emergency response procedures; and</li> <li>• Ensure the compliance with the labor code of conduct see Annex V.</li> </ul>
	<p><b>Community Health and Safety:</b> Community health and safety issues may arise during the implementation of sub-project such as communicable disease, roadside accidents due to the movement of sub-project vehicles, GBV/SEA/SH and conflict with locals.</p>	<ul style="list-style-type: none"> <li>• Ensure the compliance with contactors' site-specific PCRMP prepared with the support/ consent of E&amp;S Specialists of PMU;</li> <li>• Ensure that the site will be restricted for the entry of irrelevant people;</li> <li>• Provision of proper safety signage and equipment;</li> <li>• Ensure the training and awareness session for the workers and community.</li> <li>• Ensure effective implementation of GRM to timely address the issues;</li> <li>• Contractor will take due care of the local community and observe sanctity of local customs and traditions by his staff. Contractor will warn the staff strictly not to involve in any unethical activities and to obey the local norms and cultural restrictions;</li> <li>• The Contractor will make sure that no discrimination is made on the basis of gender while hiring of workers; and</li> <li>• Provisions related to SEA/SH/GBV will be incorporated in the bidding document.</li> </ul>
	<p><b>Lack of meaningful community engagement:</b> There is a risk that sub-project related stakeholders including vulnerable groups, such as religious and ethnic minorities and people with disabilities may be excluded from stakeholder consultations, to provide feedback on design and impacts.</p>	<ul style="list-style-type: none"> <li>• Mapping and engaging stakeholders, including vulnerable groups at the start of the design process and implementation for their feedback about sub-project interventions;</li> <li>• PMU dedicated staff will be responsible for the implementation of the GRM and stakeholder engagement; and</li> <li>• Sub-project staff will be trained on social inclusion and stakeholder engagement.</li> </ul>
	<p><b>Chance Findings of Important Physical and Cultural Resources:</b> During the course of construction activities, the sub-project may encounter the chance finding of</p>	<ul style="list-style-type: none"> <li>• The sub-project site will be screened for the presence of physical cultural resources prior to commencement of</li> </ul>

Sr. No.	Environmental and Social Impacts	Mitigation Measures
	important physical cultural resources.	construction work; and <ul style="list-style-type: none"> <li>• Ensure the compliance with the chance find procedure provided in Annex VII.</li> </ul>
	<p><b>Forced Labor and Child Labor:</b></p> <p>There is a risk that child labor and forced labor may be used during the implementation of the sub-project.</p>	<ul style="list-style-type: none"> <li>• Contractors will be prohibited from hiring children below the age of 14 for any type of labor, and below the age of 18 for hazardous work;</li> <li>• Sub-project staff will monitor sites to check for child labor, and will hold regular consultations to keep a check on forced labor at sub-project sites; and</li> <li>• Awareness will be created among the local communities about the adverse impacts of child labor;</li> </ul>

## **6. ENVIRONMENTAL AND SOCIAL MITIGATION AND MONITORING PLAN**

This chapter summarizes the mitigation, monitoring, and institutional measures to be taken during the implementation of proposed sub-project to eliminate adverse environmental and social impacts. The E&S monitoring checklist for the PCRMP implementation is attached as Annex III.

### **6.1. KEY STEPS FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT**

Environmental and Social (E&S) management will follow the below mentioned procedures closely linking with activities under proposed sub-project:

- As per advice of Environmental and Social Experts/nominated focal person (DoAM), inclusion of social and environmental mitigation costs in the sub-project document/cost;
- Inclusion of the PCRMP in the bidding document; and
- Implementation of mitigation measures provided in this PCRMP by the E&S experts of PMU and Focal Person (FP) of DOAM at field level.

### **6.2. INSTITUTIONAL ARRANGEMENTS**

#### **6.2.1. Implementation Arrangements**

The Project Director-PMU KITE DoT, through E&S experts of PMU and Focal Person of DoAM at field level, will be responsible for the overall implementation of PCRMP.

The PCRMP implementation arrangements have been suggested to keep it well aligned and synergetic with the overall Sub-project implementation and institutional setup as described below:

- a) PMU Level: The E&S Experts will be responsible for top supervision of PCRMP with the support of focal person from DoAM. The E&S Experts will be responsible for implementing all E&S related requirements including planning, implementation, coordination, monitoring and reporting of all E&S related activities. The PMU KITE DoT in coordination with DoAM will nominate E&S focal person at field level and maintain liaison and coordination during the implementation of PCRMP.
- b) Field Level: The nominated E&S focal person will supervise the implementation of the E&S related requirements including compliance during the sub-project implementation. E&S focal person will provide necessary support and assist the E&S Experts of PMU to establish progress reports.

Contractors will be required to comply with the E&S requirements provided in PCRMP. This provision will be specified in the contractor's agreements. Contractor will be expected to disseminate and create awareness within their workforce related to E&S risk management compliance for the effective implementation of PCRMP.

### 6.3. ROLES AND RESPONSIBILITIES

The roles and responsibilities of executing the sub-project in effective manner are given in Table 6-1.

**Table 6-1 Roles and Responsibilities on Sub-Project**

Sr. No.	Level/Responsible Party	Roles and Responsibilities
1.	<b>Project Management Unit (PMU) KITE DoT</b>	<ul style="list-style-type: none"> <li>• Ensure compliance of World Bank OPs and national and provincial law and regulations relevant to the sub-project.</li> <li>• Review monthly, quarterly and annual progress reports on sub-project activities against the contractual obligations for both supervisory consultant and the contractor.</li> <li>• Oversee overall implementation and monitoring of environmental and social mitigation and management activities and compile the progress reports from the sub-project and report to World Bank on quarterly basis.</li> <li>• Conduct trainings and awareness sessions for consultant, contractor and community that are responsible for implementation of PCRMP.</li> <li>• Ensure that bidding and contract documents include PCRMP.</li> <li>• Maintain close liaison between World Bank, DoAM and other Government Departments (where applicable) and E&amp;S Expert on sub-project site for smooth and effective implementation of PCRMP.</li> <li>• In case of serious incident, notify the World Bank within 48 hours.</li> <li>• Upon completion of work review and evaluate progress, completion of sub-project activities and all the required E&amp;S mitigation measures.</li> </ul>
2.	<b>Contractor</b>	<ul style="list-style-type: none"> <li>• Fulfil the contractual obligations pertaining to environmental and social mitigation and management measures as specified in the PCRMP.</li> <li>• Appoint E&amp;S officer/inspector for the effective implementation of PCRMP.</li> <li>• Take all necessary measures to protect the health and safety of workers and community and avoid, minimize, or mitigate any environmental harm resulting from sub-project activities.</li> <li>• Must refrain from taking any action on sub-project site without prior approval from the DoAM (as a supervisory role) and PMU DoT, which is not clearly stated in the contract.</li> <li>• Develop site specific constructor's PCRMP (C-PCRMP) with the support/consent of E&amp;S Experts of PMU DoT based on the guidelines provided in this PCRMP, prior to mobilization/start of conservation and preservation/civil works.</li> </ul>
3.	<b>DoAM (Supervisory role)</b>	<ul style="list-style-type: none"> <li>• To oversee the performance of the Contractor to make sure that the Contractor is complying with PCRMP;</li> <li>• Ensuring that the day-to-day conservation and preservation/civil works activities are carried out in an environmentally and socially sound and sustainable manner;</li> <li>• Strong coordination with the Contractor and E&amp;S Experts PMU-KITE-DoT;</li> <li>• Preparing training materials regarding defining PCRs and</li> </ul>

Sr. No.	Level/Responsible Party	Roles and Responsibilities
		<p>chance finds, local sensitivity to damage to PCRs, sensitivity of cultural heritage sites to looting and legal penalties for looting or the destruction of cultural heritage sites, chance finds reporting procedures and consultation process with local regulatory agencies;</p> <ul style="list-style-type: none"> <li>• Ensure the implementation of the mitigation measures suggested in PCRMP;</li> <li>• Periodic reporting of PCRMP to E&amp;S Expert of PMU DoT and maintain a close Liaison; and</li> <li>• Suggest any additional mitigation measures (where required).</li> </ul>
4.	<b>Monitoring and Evaluation Consultant (MEC)</b>	<ul style="list-style-type: none"> <li>• Monitoring and Evaluation Consultant shall carryout intermittent third-party monitoring of the sub-projects;</li> <li>• MEC will also carry out annual third-party auditing of PCRMP through E&amp;S Experts and make further modifications, if required.</li> </ul>

#### 6.4. MONITORING MECHANISM

Monitoring will be carried out to ensure that the mitigation measures are regularly and effectively implemented. It will be performed at PMU, field level (by DoAM) and by the Contractor. Two complementary methodology approaches are being applied to monitor the proposed actions under the PCRMP:

Compliance monitoring; which checks whether the actions proposed in the PCRMP have been carried out by visual observation, photographic documentation and the use of checklists prepared for the PCRMP; and Effects monitoring; which records the consequences of sub-project activities on the environment, (if required/ as per advice of E&S Experts of PMU-DoT).

A monitoring checklist developed by PMU-DoT based on the PCRMP, will be used by Focal Person (DoAM) on monthly basis. The monitoring checklist is provided in Annex-I. The E&S Experts of PMU-DoT shall conduct field visit on monthly basis while the Focal person (DoAM) on at least weekly basis to ensure the effective implementation of PCRMP.

#### 6.5. REPORTING AND DOCUMENTATION

At a minimum, the reporting will include (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of sub-project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, (vi) public notification and communications, (vii) progress on the implementation and completion of sub-project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out.

In case of serious incident in connection with the sub-project, which may have significant adverse effects on the environment, the affected communities, the public, or workers, PMU DoT should notify the World Bank within 48 hours.

Reports from the field levels (DoAM) will be submitted to the relevant PMU, where they will be aggregated and submitted to the World Bank on a quarterly basis. The reporting requirements are provided in **Table 6-2**.

**Table 6-2 Reporting Responsibilities and Frequencies**

Sr. No.	Type of Reporting	Frequency	Responsibility	Submitted to
1.	Visit Reports and Consultations with relevant stakeholders (with date, time, venue and photographs)	Monthly	E&S Experts of PMU	PD-PMU
2.	E&S Monitoring Checklists	Monthly	Focal Person DoAM	E&S Experts of PMU
3.	Progress Reports	Quarterly	E&S Experts of PMU	World Bank
4.	Incident and Accident Reporting	Within 48 hours	E&S Experts of PMU	World Bank
5.	MEC/ Third Party Reports	Annually	PMU	PSC
6.	Completion Report	After completion of Sub-project	E&S Experts of PMU	World Bank

## 6.6. TRAINING AND CAPACITY BUILDING

To ensure the successful implementation of PCRMP and compliance of the E&S mitigation measures, strengthening capacity of sub-project staff and workers is essential. This will be achieved through series of customized trainings and awareness sessions. Table VI below provides capacity building / training framework for the proposed sub-project.

**Table 6-3 Capacity Building Trainings**

Key Aspects to Cover	Participants	Frequency	Responsible Party
<ul style="list-style-type: none"> <li>• Site conservation and preservation techniques and monitoring</li> <li>• E&amp;S awareness</li> <li>• Legal and regulatory (local and WB requirements)</li> <li>• World Bank Group General EHS Guidelines</li> <li>• Procedures defined in the PCRMP</li> <li>• Community and occupation health and safety;</li> </ul>	Contractor staff including workers DoAM Staff and PMU DoT Staff ;	Prior to sub-project commencement; Refresher as and when required basis throughout the sub-project implementation	E&S staff-PMU  DoAM (where required)

Key Aspects to Cover	Participants	Frequency	Responsible Party
<ul style="list-style-type: none"> <li>• E&amp;S monitoring checklist;</li> <li>• Monitoring and reporting;</li> <li>• Gender sensitivity;</li> <li>• Stakeholder engagement;</li> <li>• Labor management including code of conduct;</li> <li>• Waste management and resource conservation</li> <li>• GRM</li> <li>• Emergency Response Procedures</li> <li>• Documentation reporting</li> </ul>			

## 6.7. PCRMP IMPLEMENTATION BUDGET

Table 6-4 presents the estimated cost of PCRMP implementation. The Contractor however shall be paid against the actual execution with evidential proof of relevant PCRMP activity.

**Table 6-4 PCRMP Implementation Budget**

Sr.No.	Item	Frequency/Quantity	Unit Rate (PKR)	Estimated Cost (Million PKR)	Remarks
1.	E&S Officer/Inspector	1	50,000/-	12,00,000/-	For 24 months
2.	Environmental monitoring and testing.	Lump sum	200,000/-	200,000/-	As per advice of E&S Expert PMU/ Since the scale of work is not large therefore, it is anticipated that environmental monitoring may not be required
3.	Training & Capacity Building Cost	Lump sum	200,000/-	200,000/-	
4.	Personal Protective Equipment (PPE) Cost	Lump sum	100,000/-	100,000/-	
5.	Tree Plantation Cost	Lump sum	150,000/-	150,000/-	As environmental enhancement measure
6.	MEC/Third party				The cost of MEC shall be included in overall cost of KITE Project
Total Cost				18,00,000/-	

### Annexure- I E&S SCREENING CHECKLIST OF JAMAL GARRHI SITE

Sr. No	ISSUES	None	Minor/ Small	Moderate/ Medium	Significant & Large	Remarks
<b>A</b>	<b>Zoning and Land Use Planning</b>					
1.	Will the sub-project affects land use zoning and planning or conflict with prevalent land use patterns?	X				The subproject will not affect the land use zoning and planning The land is solely owned by DoAM
2.	Will the sub-project involves significant land disturbance or site clearance?	X				Since the subproject involves small scale conservation and preservation activities therefore, no significant land disturbance or site clearance will be involved.
3.	Will the sub-project land be subject to potential encroachment by urban or industrial use or located in an area intended for urban or industrial development?	X				There is no encroachment issue. The site is not located in an area intended for urban or industrial development.
<b>B</b>	<b>Utilities and Facilities</b>					
1.	Will the sub-project require the setting up of ancillary facilities?	X				No, the subproject will not require the setting up of ancillary facilities.
2.	Will the sub-project make significant demands on utilities and services?	X				No, the sub-project will not make significant demands on utilities and services.
3.	Will the sub-project require significant levels of accommodation or service amenities to support the workforce during construction	X				Approximately 5-8 workers (preferably locals) shall be hired during the subproject implementation. Therefore, significant levels of accommodation or service amenities will not require.
<b>C</b>	<b>Water and Soil Contamination</b>					
1.	Will the sub-project require large amounts of raw materials or construction materials?		X			Since, the subproject will involve small scale conservation, preservation and civil works, only small amount of construction materials will be required during subproject implementation.
2.	Will the sub-project generate large amounts of residual wastes, construction material waste or cause soil erosion?	X				No, subproject will not generate large amounts of residual wastes, construction material waste or cause soil erosion.
3.	Will the sub-project result in potential soil or water		X			Improper waste management at site may

Sr. No	ISSUES	None	Minor/ Small	Moderate/ Medium	Significant & Large	Remarks
	contamination (e.g., from oil, grease and fuel from equipment yards)?					result in soil contamination, however, relevant measures have been provided in the PCRMP.
4.	Will the sub-project lead to an increase in suspended sediments in streams affected by road cut erosion, decline in water quality and increased sedimentation downstream?	X				Since the sub-project involve small scale activities therefore no significant generation in suspended sediments is anticipated.
5.	Will the sub-project involve the use of chemicals or solvents?		X			Only Lime is used in conservation & preservation works
6.	Will the sub-project lead to the involve removal of vegetation/ tree?		X			The subproject will not involve removal of tree. However, in case, if a tree is cut or affected, compensatory tree plantation (ten saplings for each lost tree) shall be carried out.
7.	Will the sub-project lead to the creation of stagnant water bodies in borrow pits, quarries, etc., encouraging for mosquito breeding and other disease vectors?		X			The fresh water stored for lime mortars used for conservation & preservation activities may become a breeding ground for mosquitos and pose threat for dengue
<b>D</b>	<b>Noise and Air Pollution Hazardous Substances</b>					
1.	Will the sub-project increase the levels of harmful air emissions?		X			Since the sub-project involve small scale conservation & preservation/civil works activities, therefore no major impact of air is anticipated.
2.	Will the sub-project increase ambient noise levels?		X			Since the sub-project involve small scale conservation & preservation/civil works activities, therefore no major impact of noise is anticipated.
3.	Will the sub-project involve the storage, handling or transport of hazardous substances?	X				No, sub-project will not involve the storage, handling or transport of hazardous substances
<b>E</b>	<b>Fauna and Flora</b>					

Khyber Pakhtunkhwa Integrated Tourism Development Project (KITE)

Physical and Cultural Resource Management Plan (PCRMP)

Sr. No	ISSUES	None	Minor/ Small	Moderate/ Medium	Significant & Large	Remarks
1.	Will the sub-project involves the disturbance or modification of existing drainage channels (rivers, canals) or surface water bodies (wetlands, marshes)?	X				No, the sub-project will not involve the disturbance or modification of existing drainage channels or surface water bodies.
2.	Will the sub-project lead to the destruction or damage of terrestrial or aquatic ecosystems or endangered species directly or by induced development?	X				No direct impact o biodiversity is anticipated, as all the activities shall be carried out in already built up environment.
3.	Will the sub-project lead to the disruption/destruction of wildlife through interruption of migratory routes,	X				No, the sub-project will not lead to the disruption/destruction of wildlife through interruption of migratory routes
4.	Disturbance of wildlife habitats, and noise-related problems?	X				Since the sub-project involve small scale conservation & preservation/civil works activities, therefore no major impact of noise is anticipated.
<b>F</b>	<b>Destruction/Disruption of Land and Vegetation</b>					
1.	Will the sub-project lead to unplanned use of the infrastructure being developed?	X				
2.	Will the sub-project lead to long-term or semi-permanent destruction of soils in cleared areas not suited for agriculture?	X				
3.	Will the sub-project lead to the interruption of subsoil and overland drainage patterns (in areas of cuts and fills)?	X				
4.	Will the sub-project lead to landslides, slumps, slips and other mass movements in road cuts?	X				
5.	Will the sub-project lead to erosion of lands receiving concentrated outflow carried by covered or open drains?	X				
6.	Will the sub-project lead to health hazards and interference of plant growth adjacent to roads by dust raised and blown by vehicles?		X			
<b>G</b>	<b>Cultural Property</b>					

*Khyber Pakhtunkhwa Integrated Tourism Development Project (KITE)*

*Physical and Cultural Resource Management Plan (PCRMP)*

Sr. No	ISSUES	None	Minor/ Small	Moderate/ Medium	Significant & Large	Remarks
1.	Will the sub-project has an impact on archaeological or historical sites, including historic urban areas?		X			The sub-project activities will be carried out on archaeological site for conservation and preservation purpose.
2.	Will the sub-project have an impact on religious monuments, structures and/or cemeteries?	X				
<b>H</b>	<b>Expropriation and Social Disturbance</b>					
1.	Will the sub-project involves land expropriation or demolition of existing structures?	X				No demolition is required
2.	Will the sub-project lead to induced settlements by workers and others causing social and economic disruption?	X				No, the workers will commute daily
3.	Will the sub-project lead to environmental and social disturbance by construction camps?	X				No construction camp shall be established.
4.	Will the sub- project require of tree cutting, if yes how many, location, pictures?	X				The subproject will not involve removal of tree. However, in case, if a tree is cut or affected, compensatory tree plantation (ten saplings for each lost tree) shall be carried out.
5.	Will there be any social conflicts arising from the interaction of laborers with locals, particularly by the induction of outside labor?		X			No settlement exists near the sub-project area, therefore no direct impact is anticipated on the community. However, in case of any incident, relevant measures provided in the PCRMP will followed. Mostly, local labor shall be hired.
6.	Will there be a risk of using Child and forced labor in subproject activities?			X		There is a risk that the Contractor may involve the use of forced labor and child labor. However, it will be ensured through a contractual agreement and implementation of PCRMP that the Contractor shall not utilize child and forced labor during the execution of the subproject.
7.	Will there be a risk of occupational and community health and safety?		X			During subproject implementation, these risks may arise. However, necessary

Sr. No	ISSUES	None	Minor/ Small	Moderate/ Medium	Significant & Large	Remarks
						measures will be provided in the PCRMP to manage.
8.	Will the proposed subproject potentially involve shifting of public utilities?	X				The subproject will not involve shifting public utilities.
9.	Are any indigenous peoples present in the subproject area?	X				There are no indigenous people in the subproject area.
10.	Will the subproject involve land acquisition? or any informal settlers present on the subproject site					No land acquisition is involved and there are no informal settlers or affected persons present at the subproject site.

## Annexure- II PCRMP CHECKLIST FOR ARCHAEOLOGICAL SITE JAMAL GARRHI MARDAN

<b>Heritage Site's Name</b>	Jamal Garrhi
<b>Total Budget</b>	PKR 10 million
<b>Assessment Date</b>	22/03/2023
<b>Name of Accessor</b>	Dr. Irfan Ahmed Khan
<b>Designation of Accessor</b>	Consultant
<b>Project Implemented By</b>	Department of Tourism, Khyber Pakhtunkhwa Integrated Tourism Development Project
<b>Project Monitored By</b>	Department of Tourism through its PMU, Khyber Pakhtunkhwa Integrated Tourism Development Project
<b>Consultation Undertaken</b>	Yes, with local people and DoAM officials (Engr. Tayyeb, Mr. Najeebullah)

<b>Heritage Site's Name</b>	Archaeological Site Jamal Garrhi, Mardan	
<b>1. Location:</b>		
Latitude	34.320443° N	
Longitude	72.069019° E	
Elevation	401 meters	
Tehsil/District	Mardan	
Province	Khyber Pakhtunkhwa	
<b>2. Ownership</b>		
Government	Responsibility of DoAM, KP	
Private individual		
<b>3. Type of Heritage site</b>		
Stupa/Monastery	✓	
Site		
<b>4. Size/Area</b>		
Total area		
Covered area		
<b>5. Tentative Chronology</b>		
Prehistoric		
Protohistoric		
Hindu		
Buddhist	✓	
Islamic		
Any other		
<b>6. Type of Property/Land of PCR</b>		
Agriculture		
Commercial		
Barren	✓ People do graze in the mountains around the PCR, the mountains carry shrubs.	
<b>7. Present condition of the PCR</b>		

	Intact			
	Partly damaged	✓ At places the stairs have been damaged due to weathering.		
	Defaced			
<b>8.</b>	<b>Physical Requirement</b>			
	Restoration	Yes, there are features that need restoration (stairs, stupas)		
	Conservation & preservation	Yes, the site needs to be conserved for future		
	Beautification			
	Civil Works	yes		
	Any other			
<b>9.</b>	<b>Excavations</b>			
	Subsurface features/structures	No		
	Deep digging/Profiling	No, but for conservation small pits in the ground may be made for storing water for making lime mortar		
<b>10.</b>	<b>Significance of PCR</b>			
	Historical			
	Archaeological	Jamal Garrhi is an archaeological site containing stupas		
	Cultural			
	Socio-economic			
<b>11.</b>	<b>Security/Protection Measures of PCR</b>			
	Fencing/boundary wall	✓		
	Barbed wire			
<b>12.</b>	<b>Conservation &amp; preservation Assessment of PCR</b>			
	Identification of areas	Nil		
	Material availability	Nil		
	Impacts	Nil		
<b>13.</b>	<b>Nature and Extent of Potential Impacts on PCRs during conservation/preservation</b>			
	Physical	✓		
	Social	✓		
	Environmental	✓		
	Economic	Nil		
	Academic	Nil		
<b>14.</b>	<b>Potential Causes of Damages to the PCRs during conservation/preservation</b>			
		Assessment	Mitigation measures	Irreversibility
	Walk/Pathways	Nil		
	Drainage	Nil		
	Access/Approach	Nil		
	Electrification	Nil		
	Lawns/Plantation	Nil		
	Rooms/Stores/Office construction	Nil		
	Material re-use	Nil		

	Parking	Nil		
	Sheds	Nil		
	Any other	Nil		
<b>15.</b>	<b>Extent of Potential Damage</b>			
	Structures	Nil		
	Area	Nil		
	Access	Nil		
	Beauty	Nil		
	Societal	Nil		
	Any other	Nil		

## Annexure-III KHYBER PAKHTUNKHWA INTEGRATED TOURISM DEVELOPMENT PROJECT TEMPLATE OR ENVIRONMENTAL AND SOCIAL MONITORING

Sub-project Name:

Contractor Name:

Location:

Weather Condition:

Date:

Time:

Sr.No.	Performance Indicators	Yes	No	N/A	Description  (Compliance / Non-Compliance)	Remarks
<b>Environment</b>						
1.	Dust emissions					
2.	Noise generation					
3.	Water sprinkling					
4.	Discharge of waste water to nearby water water body					
5.	Soil erosion					
6.	Any spillage of fuel/oil observed					
7.	Dumping of solid waste at designated Site					
8.	Dumping of construction waste/spoil at designated Site					
9.	Burning of waste materials					
10.	Unattended borrow areas					
11.	Awareness and training					
<b>Ecological</b>						
12.	Protection of Flora/Fauna					
13.	Cutting of trees / vegetation					
14.	Compensatory plantation					
15.	Hunting, trapping or poaching					
16.	Introduction alien or non-native species					
17.	Awareness and training					
<b>Social</b>						
18.	Availability of Drinking water					
19.	Site housekeeping					
20.	Warning signs displayed , where applicable					
21.	Use of PPEs					
22.	Any incident/accident					
23.	Labour influx					
24.	Any GBV/SEA and privacy related complaints					
25.	Availability of first aid boxes at site					
26.	Any land acquisition					

Sr.No.	Performance Indicators	Yes	No	N/A	Description (Compliance / Non-Compliance)	Remarks
27.	Any involuntary resettlement under the project					
28.	Disturbance due to construction camp, if any					
29.	Security issues					
30.	Proportion of local labor in the project					
31.	Child/Forced Labor					
32.	Is the GRM properly in place					
33.	Health and Safety issues (both community and occupational)					
34.	Regular monitoring of complaint register is in practice					
35.	Training and awareness					
36.	Participation of women, children, and vulnerable groups in consultations and project activities					
37.	Any Unusual Conditions (e.g., heavy rain, extreme weather)					
38.	Accidental damages to PCRs					
39.	Chance finds during construction					
40.	Unanticipated impact, if any					
<b>Note If any:</b>						
<b>Photographic Record</b>						
<b>Filled By:</b> _____		<b>Extra Note if needed:</b>				
<b>Signature</b>						
<b>Name:</b> _____						
<b>Position:</b> _____						

## Annexure-IV INCIDENT/ ACCIDENT REPORTING FORMAT

<b>A: Incident Details</b>			
<b>Date of Incident:</b>	<b>Time:</b>	<b>Date Reported to PMU:</b>	<b>Date Reported to WB:</b>
<b>Reported to PMU by:</b>	<b>Reported to WB by:</b>	<b>Notification Type:</b> Email/phone call/media notice/other	
<b>Trading Name of Main Contractor:</b>		<b>Trading Name of Subcontractor:</b>	
<b>B: Type of incident (please check all that apply)</b>			
Fatality <input type="checkbox"/> Lost Time Injury <input type="checkbox"/> Displacement Without Due Process <input type="checkbox"/> Child Labor <input type="checkbox"/> Acts of Violence/Protest <input type="checkbox"/> Disease Outbreaks <input type="checkbox"/> Forced Labor <input type="checkbox"/> Unexpected impacts on heritage resources <input type="checkbox"/> Unexpected impacts on biodiversity resources <input type="checkbox"/> Environmental pollution incident <input type="checkbox"/> Dam failure <input type="checkbox"/> Other <input type="checkbox"/>			
<b>C: Description/Narrative of Incident</b>			
<i>Please replace text in italics with brief description, noting for example:</i> <ol style="list-style-type: none"> <li><i>I. What is the incident?</i></li> <li><i>II. What were the conditions or circumstances under which the incident occurred (if known)?</i></li> <li><i>III. Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions?</i></li> <li><i>IV. Is the incident still ongoing or is it contained?</i></li> </ol> <i>Have any relevant authorities been informed?</i>			
<b>D: What support has been provided to affected people?</b>			
<b>E: Actions taken to contain the incident</b>			
<b>Short Description of Action</b>	<b>Responsible Party</b>	<b>Expected Date</b>	<b>Status</b>

**For incidents involving a contractor:**

Have the works been suspended (for example, under Contract GCC7.6 or GCC8.9 of Works)? Yes ; No ;  
**Please attach a copy of the instruction suspending the works.**

**F: Investigation Findings**

*Please replace text in italics with findings, noting for example:*

- I. where and when the incident took place*
- II. who was involved, and how many people/households were affected*
- III. what happened and what conditions and actions influenced the incident*
- IV. what were the expected working procedures and were they followed*
- V. did the organization or arrangement of the work influence the incident*
- VI. were there adequate training/competent persons for the job, and was necessary and suitable equipment available*
- VII. what were the underlying causes; where there any absent risk control measures or any system failures*

**G: Fatality/Lost time injury information**

Cause of fatality/injury for worker or member of the public (please check all that apply):

- 1. Caught in or between objects
- 2. Struck by falling objects
- 3. Stepping on, striking against, or struck by objects
- 4. Drowning
- 5. Chemical, biochemical, material exposure
- 6. Falls, trips, slips
- 7. Fire & explosion
- 8. Electrocution
- 9. Homicide
- 10. Medical Issue
- 11. Suicide
- 12. Others
- Vehicle Traffic:* 13. Project Vehicle Work Travel
- 14. Non-project Vehicle Work Travel
- 15. Project Vehicle Commuting
- 16. Non-project Vehicle Commuting
- 17. Vehicle Traffic Accident (Members of Public Only)

Name	Age/DOB	Date of Death/Injury	Gender	Nationality	Cause of Fatality/Injury	Worker (Employer) Public

**H: Financial Support/Compensation Types (To be fully described in Corrective Action Plan template)**

- 1. Contractor Direct
- 2. Contractor Insurance
- 3. Workman's Compensation/National Insurance
- 4. Court Determined Judicial Process
- 5. Other
- 6. No Compensation Required

Name	Compensation type	Amount	Responsible party

**I: Supplementary Narrative**

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## Annexure-V LABOUR CODE OF CONDUCT

I, \_\_\_\_\_, acknowledge that adhering to environmental, social, health and safety (ESHS) requirements, preventing GBV/SEA/SH and child abuse/exploitation is important. All forms of misconduct are unacceptable be it on the work site and the work site surroundings. Prosecution of those who commit any such misconduct will be pursued as appropriate. I agree that while working on this sub-project, I will:

1. Consent to a security background check;
2. Treat women, children (persons under the age of 18), project staff including other workers, and persons with disability with respect regardless of race, color, language, religion, political or other opinions, national, ethnic, or social origin, property, birth, or another status;
3. Not use language or behavior towards men, women, or children/learners that are inappropriate, harassing, abusive, sexually provocative, demeaning, or culturally inappropriate;
4. Carry out his/her duties competently and diligently;
5. Comply with all applicable national/provincial laws, regulations, and World Bank requirements;
6. Comply with the PCRMP as approved by the Client to meet its ESHS and OHS objectives as well as preventing and/or mitigating the risks of GBV
7. Maintain a safe working environment including but not limited to:
  - a. Ensuring that workplaces, machinery, equipment, and processes under each person's control are safe and without risk to health, preventing avoidable accidents, and reporting conditions or practices that pose a safety hazard or threaten the environment;
  - b. Wearing required personal protective equipment;
  - c. Using appropriate measures relating to chemical, physical and biological substances, and agents; and
  - d. Following applicable emergency operating procedures.
8. Not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature at work site, the work site surroundings/nearby communities;
9. Not participate in sexual activity with children—mistaken belief regarding the age of a child and consent from the child is not a defense;
10. Not exchange money, employment, goods, or services for sex, with community members including sexual favors or other forms of humiliating, degrading, or exploitative behavior;
11. Refrain from all forms of GBV, are unacceptable, regardless of whether they take place on the work site, the work site surroundings or within the local community;
12. Attend trainings mentioned in the PCRMP of this sub-project;
13. Report to the relevant committee any situation where I may have concerns or suspicions regarding acts of misconduct by a fellow worker, whether in my company or not, or any breaches of this code of conduct provided it is done in good faith;
14. Refrain from hiring forced and child labor
15. Refrain from any form of theft for assets and facilities including from surrounding communities.

16. Remain in the designated working area during working hours;
17. Refrain from possession of alcohol and illegal drugs and other controlled substances in the workplace and being under the influence of these substances on the job and during working hours; and
18. Channel grievances through the established grievance redress mechanism.

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, and GBV issues. I understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action which could include:

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week's salary.
5. Termination of employment.
6. Report to the Police if warranted.

Signed by: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

For the Employer/Contractor/Worker

Signed by: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## Annexure-VI NAME AND DESIGNATION OF STAKEHOLDER MEETING PARTICIPANTS

S/No	Name of participant	Designation
1.	Mr. Sikandar	Engineer - DOAM
2.	Mr. Bakhat Muhammad	Assistant Director DOAM
3.	Mr. Tayyab	Site Engineer
4.	Mr. Ghayur Shahab	Archaeologist
5.	Mr. Iftikhar	Local
6.	Mr. Nawab Khan	Local
7.	Mr. Raz Muhammad	Visitor (Local)
8.	Mr. Shahzad Khan	Visitor (Local)
9.	Mr. Tanveer Ahmad	Visitor
10.	Mr. Hasnain	Visitor
11.	Mr. Ahmad Khan	Visitor
12.	Mr. Muneebullah	Visitor
13.	Mr. Amjad Ali	Site Attendant
14.	Mr. Arshad Ali	Ex Area Nazim (Local)
15.	Mr. Masood Khan	Site Attendant
16.	Mr. Iftikhar Ali	Site Attendant
17.	Mr. Najeebullah	Local
18.	Mst. Kainaat	House wife
19.	Mst. Razia	Teacher
20.	Mst. Nasia	Teacher
21.	Mst. Shazia Sardar Kakakhail	Program Manager Integrated Rural Development Service (IRDS)



**PICTORIAL VIEW OF STAKHOLDER CONSULTATIONS**

## **Annexure-VII CHANCE FIND PROCEDURES**

Project may involve deep excavations. Therefore, the possibility of chance find cannot be ruled out. In case of any chance find, the contractor will immediately report through Supervision Consultant to Directorate of Archaeology & Museums Department, KP, to take further suitable action to preserve those antique or sensitive remains. Representative of the Directorate will visit the site and observe the significance of the antique, artefact and Cultural (religious) properties and significance of the project. The report will be prepared by representative and will be given to the Director. The documentation will be completed and if required suitable action will be taken to preserve those antiques and sensitive remains.

In case any artefact, antiques and sensitive remains are discovered, chance find procedures should be adopted by contractor workers as follows:

- Stop the construction activities in the areas of chance find;
  - After stopping work, the contractor must immediately report the discovery to the Supervision Consultant;
  - The Director decides to take over the antiquity for purposes of custody, preservation and protection, the person discovering or finding it shall hand it over to the Director or a person authorized by him in writing;
  - Delineate the discovered site or area;
  - Consult with the local community and provincial Archaeological Department;
  - The Director shall, constitute a team of archaeologists for undertaking preliminary investigation and will decide about further course of action in light of findings of the team;
  - The suggestion of the local communities and the concerned authorities will be suitably incorporated during taking the preventive measures to conserve the antique, artefact and cultural (religious) properties; and
  - Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remain, a night guard shall be arranged until the responsible local authorities take over.
  - The contact Address of Archaeology Department is given below:
  - Directorate of Archeology & Museums,
  - Saddar Road opposite Governor House,
  - Peshawar. Tel: 091-9210985
-