

Afghanistan Community Resilience and Livelihoods Project (ACRLP)



Updated Environmental and Social Management Framework (ESMF)

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Table of Contents

List of Acronyms and Abbreviations	2
1. Executive Summary	5
2. Introduction	9
3. Project Description and Institutional Arrangements	10
4. Policy and Legal Framework	13
5. Environmental and Social Baseline	15
6. Identification and Assessment of Potential E&S Risks and Impacts and Mitigation Measures	18
7. Institutional arrangements and Monitoring and Evaluation	27
8. Estimated Budget for ESMF	30
9. Training and Capacity Building	32
Annex 1: Environmental and Social Screening Form, Generic ESMP and Template for site-specific ESMP	35
Annex 2: Negative Project List	49
Annex 3: Examples of Contractual Clauses for Contractors	50
Annex 4: Labor Management Procedures	52
Annex 5: Chance Find Procedures	62
Annex 6: Standard Operating Procedure (SOP) for Handling Land Mines (LM), Unexploded Ordnance (UXO), and Explosive Remnants of War (ERW) at the Project Site	63
Annex 7: Personal Protective Equipment (PPE) & First Aid Kit Requirements In Rural Component - AF	66
Annex 8: Terms of Reference: Environmental & Social (E&S) Unit in the PIU	76
Annex 9: E&S Documents Review Procedure	77

List of Acronyms and Abbreviations

AIB	Afghanistan International Bank
ARTF	Afghanistan Resilience Trust Fund
CCAP	Citizens' Charter Afghanistan Project
CEDAW	Convention on the Elimination of All forms of Discrimination against Women
CIP	Cities Investment Program
CoC	Code of Conduct
CRC	Conventions on the Rights of the Child
CRG	Community Representative Group
CRLP	Community Resilience and Livelihood
CSO	Civil Society Organization
E&S	Environmental & Social
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ERW	Explosive Remnants of War
EZ-Kar	Afghanistan Eshtegal Zaiee Karmondena Project
FP	Facilitating Partner
GBV	Gender-Based Violence
GIIP	Good International Industrial Practices
GRS	Grievance Redress Sub-group
GRM	Grievance Redress Mechanism
IDP	Internally Displaced Person
INGO	International Non-Governmental Organization

IPV	Intimate Partner Violence
ITA	Interim Taliban Administration
IUCN	World Conservation Union
LiW	Labor-Intensive Works
LMP	Labor Management Procedures
LM	Land Mines
MIS	Digital Information System
NGO	Non-Governmental Organization
NEPA	National Environmental Protection Agency
OHS	Occupational Health and Safety
UXO	Unexploded Ordnance
PAD	Project Appraisal Document
PDO	Project Development Objective
PIU	Project Implementation Unit
PSEA	Prevention of Sexual Exploitation and Abuse
PWD	Person with Disability
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SRA	Security Risk Assessment
UN	United Nations
UNOPS	United Nations Office for Project Services
VAWG	Violence against Women and Girls
WB	World Bank

Lessons learned from the implementation of the parent and additional financing (AF1) projects to date have shown that Facilitating Partners (FP) require an increased budget for the implementation of environmental and social risk management in order to ensure a safe workplace for the workers and communities. Similarly, FPs require more frequent capacity building in E&S risk assessment and especially OHS risk mitigation measures. This will be included in the AF2 activities in the form of increased capacity building activities of contractors and partners and awareness for communities and workers. Training of Trainers and refresher training to all 5 FPs will be increased. FPs and Contractors will subsequently continue to cascade the OHS training to the laborers on a daily basis.

The presence of Unexploded Ordnance (UXOs) was not anticipated under the parent project. However, lessons from implementation have shown that risks related to UXOs exist, which can potentially lead to accidents, if not handled properly. Land Mines (LMs), Unexploded Ordnance (UXOs) and Explosive Remnants of War (ERW) are a legacy of military activity affecting many parts of Afghanistan, both rural and urban. Over the period of decades of war, thousands of unexploded rockets, mortars, bombs and shells failed to explode and remained both on the surface and buried in land or underwater. LMs, UXOs and ERWs become more volatile with age and can easily be triggered by heat, shock or vibration. This makes them particularly hazardous for construction works involving any disruption of soil such as piling or earthworks. UXO handling protocols have been developed and added in Annex 6. These will be shared with FPs and Contractors.

Advocating Funds for PPE for the Laborers & First Aid Kits: UNOPS identified safety risks due to the absence of Personal Protective Equipment (PPE) and First Aid Kits for workers at project sites.

Recognizing this issue early on, the CRL conducted a thorough risk assessment and categorized the project activities into two levels (low-risk and medium-risk activities). It was determined that laborers engaged in medium-risk activities would face increased exposure to potential hazards and needed PPE to ensure their safety. This categorization allowed the project to strategically target resources where they were most needed while balancing budget limitations.

Given the high costs associated with providing PPE to over 1 million laborers, blanket distribution was not feasible. Instead, CRLP implemented a targeted approach:

- Workers engaged in low-risk activities were trained in safety protocols but did not receive full PPE.
- Workers involved in medium-risk activities, where the potential for injury was greater, were equipped with the necessary PPE, ensuring that safety measures were in place where they were most needed.

This strategic division allowed us to maximize the impact of the additional funding while maintaining the safety and well-being of the laborers.

Key Lessons and Best Practices:

1. Early Risk Identification is Critical: Identifying the lack of PPE as a risk at the beginning of the project allowed to address the issue proactively and avoid potential injuries.

2. Strategic Allocation of Resources: By categorizing activities into risk levels, enabled target PPE distribution effectively, ensuring that limited resources were used efficiently without compromising safety.
3. Cost Persistent and well-justified advocacy can result in the successful securing of additional funding.

Potential Environmental and Social Risks and Mitigation Measures

The environmental and social risk classification for the Project is 'Substantial'. The environmental risks and impacts are mostly related to generation of low to medium noise and dust pollution from minor civil works; removal of vegetation and land degradation in the rehabilitation sites and extraction of construction materials to supply the works; generation and improper disposal of general construction waste; OHS risks for workers; and low capacity of contractors and FPs to manage E&S risks, including OHS risks. The social risks of the AF2 include restrictions on women's movement and employment, social inequalities, exclusion, and potential discrimination of certain categories of people, such as returnees; occupational and community health and safety and criminality; child and forced labor; unstable security conditions including the occurrence of possible armed conflict, terrorist attacks, and the presence of LMs/UXOs and ERWs; low capacity of contractors and FPs to manage E&S risks. These risks and impacts are managed through the mitigation hierarchy approaches (avoid, minimize, mitigate and compensate) included in this ESMF. No irreversible and adverse environmental and social impacts are foreseen since most of these risks and impacts are small in scale, localized, mostly site specific and manageable through these proposed mitigation measures.

UNOPS was contracted directly by the World Bank. UNOPS finances selected Non-Government Organizations (NGOs) and local urban contractors to deliver assistance to communities. UNOPS is contracted directly by the World Bank. UNOPS is responsible for overall coordination, procurement arrangements with local organizations and contractors; engagement with communities; fiduciary, staffing, training, and E&S management; quality assurance; monitoring and reporting; and managing technical assistance activities.

Afghanistan International Bank (AIB) will support the project in the digital payment of labor wages through biometric verification. In this role, AIB staff involved in payment services will follow relevant Environmental and Social (E&S) requirements, including Occupational Health and Safety (OHS), Code of Conduct (CoC), Labor Management Procedure (LMP), SEA/SH prevention measures, and applicable security and payment procedures in coordination with UNOPS and Facilitating Partners (FPs).

In compliance with ESS10, a Project Grievance Redress Mechanism (GRM) has been designed and implemented to facilitate responses to concerns and grievances of the project-affected people and parties related to the environmental, social and Occupational Health and Safety (OHS) performance of the project as well as other project-related concerns. The project provides mechanisms to receive and facilitate resolutions to such concerns. As per World Bank standards, the GRM is responsive to SEA/SH cases with activities further detailed in the SEA/SH Action Plan, which was prepared as a separate document.

A capacity building and training program for both the beneficiaries and the E&S staff has been elaborated and has been implemented early on in the project.

The estimated costs for the implementation of this ESMF are USD\$ 2,500,000. This estimated budget includes maintenance of a functional E&S risk management organizational structure throughout project implementation, training and capacity building activities, stakeholder consultation, implementation of SEA/SH Action Plan, implementing GRM, and monitoring and documentation of ESMF implementation by FPs and urban contractors.

2. Introduction

To reflect the transition from emergency response to a medium-term resilience-building approach that emphasizes private sector engagement, the PDO is revised to: “promote livelihood opportunities and improve access to essential services and productive assets for poor Afghans, in particular women, in rural and urban areas.” This immediate assistance first provides short-term employment and income to millions of Afghans while also improving access to basic services such as clean water and sanitation. Women and vulnerable groups, such as Internally Displaced Persons (IDPs) and persons with disabilities, are especially assisted. Second, the Project supports community-level systems and institutions for long-term resilience, sustainability and inclusive development. The AF1 for the CRLP has ensured continued provision of short-term livelihood opportunities and delivered urgent essential services in rural and urban areas. Four main design changes are included in the AF2 based upon the experience of 36 months with the parent and AF1 project: (i) geographical scale-up in rural and urban areas; (ii) increased livelihood opportunities for Afghan women through a new Women’s Economic activities sub-component; (iii) heightened focus on climate resilience activities by increasing community awareness of climate risk mitigation and adaptation, and incentivizing the climate resilience-focused subprojects in urban areas; and (iv) support for the recent influx of returnees, so that they may participate in project activities and receive necessary assistance in terms of job opportunities and services in their areas of return.

Since the specific details related to the physical location and the nature and footprints of the subprojects of the proposed components were not known at the early stages of preparation, the project has adopted a framework approach. The Environmental and Social Management Framework (ESMF) is a standard instrument used to define principles, rules, and procedures to screen, assess, manage, and monitor the mitigation measures of environmental and social impacts in cases where the impacts and physical location of a project-related activity are not known in advance. It examines the potential environmental and social risks and impacts of a project and/or series of subprojects, when the environmental and social impacts cannot be determined until the activity or subproject details have been identified and prescribes procedures for the implementation of the mitigation measures following the generic Environmental and Social Management Plan (ESMP) that has been included in section 6 of this ESMF.

The ESMF ensures that timely measures are in place in order to:

- Avoid or minimize any harm to human health and security
- Avoid any loss of livelihood
- Avoid, minimize, mitigate, or compensate for any environmental degradation as a result of the interventions by projects
- Enhance positive environmental and social outcomes
- Ensure compliance with Afghanistan's legislations as well as with the World Bank's Environmental and Social Framework (ESF) and the World Bank Group General Environmental, Health and Safety Guidelines (EHSG²)

²<https://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf>

It also establishes the Project's staffing and institutional arrangements clarifying the relations between the Project Implementation Unit (PIU), Facilitating Partners (FP) and the World Bank, including each entity's roles and responsibilities in ensuring compliance with this ESMF and all other E&S instruments.

3. Project Description and Institutional Arrangements

Project Development Objective (PDO): To reflect the transition from emergency response to a medium-term resilience-building approach that emphasizes private sector engagement, the PDO is revised to: "promote livelihood opportunities and improve access to essential services and productive assets for poor Afghans, in particular women, in rural and urban areas.

This immediate assistance first provides short-term employment and income to millions of Afghans while also improving access to basic services such as clean water and sanitation. Women and vulnerable groups such as IDPs and persons with disabilities, are especially assisted. Second, the Project supports community-level systems and institutions for long-term resilience, sustainability and inclusive development. These community systems lay the groundwork for citizen engagement and a more accountable, transparent recovery. International experience confirms that in similar contexts of political transitions and conflict, it is critical to maintain livelihood opportunities, investments in basic services, as well as non-government local institutions and systems, to preserve core development gains.

Project Components: The Project is financed by the Afghanistan Resilience Trust Fund (ARTF) recipient-executed grant of US\$265 million. The Additional Financing (AF1) in the amount of US\$70 million is provided through the Trust Fund and US\$ 84 million through the International Development Association (IDA). The Additional Financing (AF2) in the amount of US\$48 million is provided through the ARTF and US\$ 95 million through the International Development Association (IDA). The components over three years are as follows: Component 1: Emergency Livelihoods Support and Services in Rural Areas; Component 2: Emergency Livelihoods Support and Services in Urban Areas; Component 3: Social Grants for Women and the Most Vulnerable in Rural and Urban Areas; Component 4: Strengthening community institutions for inclusive service delivery especially for women; Component 5: Implementation Support, and Component 6: Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)-related Risk Mitigation Activities (IDA only).

The Project restructuring was concluded in October 2024 which updates institutional arrangements to reflect the shift in focus of the CRLP's process for community mobilization and support to "Community Representative Groups" (CRGs) in AF areas. CRGs are informal, non-governmental bodies that represent men and women, Internally Displaced People (IDP) and returnees, and other poor and vulnerable groups, and fulfill the role of analysis, planning, and subproject implementation. The restructuring updates the CRLP's ECA definitions accordingly.

The components including AF2 are:

Component 1: Livelihoods Support and Climate Resilience Productive Assets in Rural Areas. This component will provide Sub-Grants to eligible NGOs to implement a cash-for-work program aimed at

rehabilitating small-scale basic infrastructure services, such as tertiary irrigation canal rehabilitation, check dams, gabion walls, retaining walls, water supply systems, and tertiary roads, and generating income opportunities for ultra-poor and vulnerable households through, inter alia, cash-for-work activities, and equipment and material associated therewith. The AF2 coverage will include around 2,153 rural communities in 38 districts in 23 provinces, including five new provinces (Badghis, Balkh, Daikundi, Ghor and Jawzjan). Coverage includes around 459 communities in 18 districts in 7 provinces in the CASA-1000 transmission line corridor of influence (CoI) within the country.

Component 2: Livelihoods Support and Services in Urban Areas : This component will support activities designed to provide livelihood opportunities for unskilled and semi-skilled laborers, enhance community resilience to climate change and disasters, and respond to urgent service delivery needs in urban areas through the provision and implementation of small-scale labor-intensive works (LIWs), including potential support to women-oriented market infrastructure. A total of eight cities will be targeted through the AF2, selected based on several criteria.

Component 3: This Component will provide Sub-Grants to eligible NGOs to: (i) provide livelihood support through cash transfers to cash transfer beneficiaries (Sub-Component 3a); and (ii) support women's economic livelihood activities through, *inter alia*, carrying out of market linkage activities and trainings on produce cultivation, skills development, financial literacy, and food processing activities, and provision of productive assets (Sub-Component 3b). Both sub-components target the most vulnerable households in the community, especially those excluded from the paid labor components under Components 1 and 2, but in the same rural and urban communities as covered by them. Component design is adjusted to take a sustainable livelihood approach by reducing the funds allocated to social grants and increasing the funds allocated to asset transfers, skills training, and market linkage support.

Component 4: Strengthening Community Institutions for Resilient, Inclusive Service Delivery especially for Women. This component provides Sub-Grants to eligible NGOs to build the capacity of CRGs and other local community institutions through: (i) supporting non-governmental organizations to carry out activities related to community mobilization, planning, implementation, monitoring and training; (ii) supporting CRGs and their sub-committees to help women and vulnerable groups engage, receive information, and have access to services, including health, nutrition, and livelihoods assistance; and (iii) supporting the enhancement and scale-up of the community-based climate and disaster risk management approach, including provision of enhanced disaster risk management and climate awareness training package and the use of community level multi-hazard exposure maps to promote risk-informed community development planning.

Component 5: Implementation Support This component will continue to support the costs of the UN implementing partner, UNOPS, to manage and oversee the program.

Component 6: SEA/SH Risk Mitigation. UNOPS will implement the SEA/SH Action Plan and associated Accountability Framework in communities falling within the CASA-1000 corridor of impact in selected provinces as defined in the Project Operations Manual (POM).

With the AF2, CRLP will reach a total of 1.58 million households with jobs, benefitting approximately 11.1 million Afghans. About 17.8 million Afghans will benefit from basic services and community assets such as rehabilitated tertiary roads, streets, cleared irrigation canals and drainage, etc. The full Project Document is publicly available here.

Ring-fenced resumption of the Central Asia-South Asia Electricity Transmission and Trade Project (CASA-1000) was agreed by the Bank as part of the endorsement of Approach 3.0.³ CASA-1000 is a \$1.2 billion regional project to bring clean energy from Tajikistan and Kyrgyz Republic to Pakistan via Afghanistan. Construction in the other three participating countries is nearly complete, and these countries requested that CASA-1000 activities in Afghanistan resume to avoid the risk of the project becoming a stranded asset. The project in Afghanistan will resume in a ring-fenced manner to ensure all construction payments and future revenues are managed outside of Afghanistan and do not involve Interim Taliban administration (ITA) systems.

Given that SEA/SH risks under CASA-1000 are high, additional mitigation support is required for construction under CASA-1000 to resume. Afghanistan has some of the region's highest prevalence of Gender Based Violence (GBV). Since the events of August 2021, GBV service provision has plummeted and there are few avenues of support for survivors. Presently, United Nations (UN) agencies are able to refer survivors to support services. To address high risks, and in line with the expanded scope of CRLP, UNOPS has been identified to support the implementation of SEA/SH mitigation measures in geographic areas overlapping CASA-1000 and the CRLP.

³ In February 2024, the World Bank Board of Executive Directors endorsed "Approach 3.0" which will deploy funds from the International Development Association (IDA) through grants to United Nations agencies and other public international organizations to continue supporting basic services nationwide, particularly those benefiting women.

4. Policy and Legal Framework

National Legal Framework: The Islamic Republic of Afghanistan has the following laws and policies in place, which are relevant for the Project:

The Environmental Law (2007): The Law is based on international standards that recognize the current state of Afghanistan's environment, while developing a framework for effective environmental management.

It lays out sustainable use, rehabilitation and conservation of biological diversity, forests, land, and other natural resources; the prevention and control of pollution; conservation and rehabilitation of the environment; and the active involvement of local communities in decision-making processes on the environment, including a clearly stated opportunity for affected persons to participate in each phase of a project.

The laws require any development project, plan, policy, or activity to apply for an environmental permit (Certificate of Compliance [CoC]) prior to implementation. For that, an Environmental Impact Assessment (EIA) needs to be submitted to the National Environmental Protection Agency (NEPA) to determine the associated potential adverse effects and possible impacts. The law also establishes a Board of Experts that reviews, assesses, and considers the applications and documents before NEPA could issue or not issue the permit. The EIA Board is appointed by the General Director of the NEPA and is composed of not more than 8 members. The EIA Board of Expert's decision can be appealed.

The EIA Policy (2017): This policy defines the administration of EIA procedures and provides the policy basis for the implementation of Chapter 3 of the Environmental Law (2007). It provides a list of projects that may have adverse impacts (Category 1) and those that may create significant negative impacts (Category 2).

Labor Law (2007): The law consists of numerous articles relevant to construction. Article 30 states that an organization can increase or decrease the hours of work during the week provided that the total working hours during a week do not exceed 40 hours. Articles 107-119 in Chapter 10 of the Law set out a range of specific requirements to ensure health and occupational safety conditions in a workplace. For example, Article 112 requires that when working in conditions harmful to health, special clothing/footwear should be at the disposal of employees free of cost. Article 114 requires that First Aid Medical kits should be available, and the treatment of an employee's illness should be at the employer's expense.

International Environmental Agreements: The Constitution binds the state to abide by the United Nations (UN) charter, international treaties, international conventions that Afghanistan has signed, and the Universal Declaration of Human Rights (Article 7).

Applicability of National Legislation: Most of the applicable laws and policies in Afghanistan still reflect old Afghan laws, as well as many new laws and policies, which were prepared and passed in the last 20 years, based on international assistance. This ESMF was prepared according to the current laws and regulations as of April 2022. The project follows all the laws and policies which do not contradict the World Bank's ESF. Where contradictions exist or where the Afghan legislation contradicts the World Bank standards, the ESF is applied.

Adhering to the national legal framework is difficult because local and national institutions, such as central and provincial NEPA offices, have limited capacity, and the project cannot engage with the ITA due to UN Chapter 7 sanctions.

International Conventions and Agreements: Afghanistan has signed and ratified the following relevant international conventions and agreements. While the current government is not recognized and is under sanctions, it is still held accountable for the continuation of international conventions and agreements. However, the capacity for implementation is extremely limited:

- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), 1983.
- Conventions on the Rights of the Child (CRC), 1989.
- Worst Forms of Child Labor Convention, 1999.
- Equal Remuneration Convention, 1951.
- Abolition of Forced Labor Convention, 1963.
- Minimum Age Convention, 2010.
- Convention on Biological Diversity, 1993.
- Convention on Climate Change, 1992 (and Kyoto Protocol in 1997, and Paris Agreement in 2015)
- Convention to Combat Desertification, 1994.
- Convention on International Trade in Endangered Species of Wild Fauna and Flora, 1973.
- Vienna Convention for the Protection of the Ozone Layer, 1988.
- UN Charter – Article 41, Chapter 7, which is the basis for sanctions against Al Qaeda / Taliban
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (1992) – aims to reduce movement of hazardous waste between nations, prevent transfer of such waste from developed to less developed countries; minimize waste amounts and toxicity; promote environmentally sound management at or near generation sites; assist less developed countries in environmentally sound management of their wastes; does not address radioactive waste;

World Bank ESF Guidelines: The World Bank's 10 Environmental and Social Standards (ESS) establish the standards that the project will meet through the project life cycle, as follows. The following ESSs are relevant to the CRLP: ESS1 on Assessment and Management of Environmental and Social Risks and Impacts; ESS2 of Labor and Working Conditions; ESS3 on Resource Efficiency, Pollution Prevention and Management; ESS 4 on Community Health and Safety; and ESS on Stakeholder Engagement and Information Disclosure. The CRLP further applies the WBG General EHS Guidelines from 2007. These guidelines contain the performance levels and measures that are acceptable to the WB. When the national regulation differs from the levels and measures presented in these guidelines, the project is required to achieve whichever is more stringent.

5. Environmental and Social Baseline

Climate: Afghanistan is a land-locked country in the center of Asia, covering an area of about 652,000 square kilometers. It is mostly semi-arid. The country's climate is continental, with temperatures ranging between 30°C in summer in the lowlands to minus 20-40°C in winter in the highlands. The average annual rainfall of about 250 millimeters conceals stark variations between different parts of the country, from 1,200 millimeters in the higher altitudes of the northeast to only 60 millimeters in the southwest. Due to its mountainous relief and the convergence of several climate systems, Afghanistan boasts an impressive diversity of ecosystems, land cover and water sources.

Climate Change: The World Bank predicts that Afghanistan will see a warming higher than the global average due to global warming.⁴ Since 1950, a rise of 1.8C has been recorded.

The majority of the country's population lives in rural areas. That portion of the population relies heavily on productive natural resources, which makes it extremely vulnerable to the impacts of local and global phenomena (such as droughts, natural disasters, climate change and desertification) and the degradation of natural resources through erosion and pollution of soil and water.

Topography: Afghanistan is a landlocked country, with the Hindukush mountains running northeast to southwest, dividing the northern provinces from the rest of the country. The Hindukush mountain range reaches a height of 7,492 meters at Noshaq.

Surface water and groundwaters: There are four major rivers crossing the country: Amu Darya, Hari River, Kabul River, and Helmand River, as well as smaller rivers, lakes and streams. Rainfall in Afghanistan is scarce and mainly affects the northern highlands in March and April. In the lowlands rain can be rare and unpredictable. However, Afghanistan usually does not face water shortages, due to the melting snow that flows into the rivers, streams and lakes.

Natural Disasters: Since the country is located in a zone of high-seismic activity, earthquakes are common. Damaging earthquakes occur in the Hindukush mountains. Flooding and mudslides are real dangers in the mountains and valleys, particularly in spring and summer when snow starts melting or glacier lakes suddenly burst causing destructive flash floods. Prolonged drought and dust storms can also wreak extensive damage, with nationwide impacts. Extreme winter conditions bring high losses in agriculture and infrastructure. These factors add to the burden of environmental degradation and place stress on ecosystems.

Ecology: Afghanistan has four eco-regions: Closed Forest Vegetation; Open Woodland Vegetation; Semi-Desert Vegetation; and Sub-Alpine and Alpine Vegetation. A recent study breaks these down into 15 smaller regions, of which 4 are considered critical/endangered, 8 as vulnerable, and only 2 as stable.⁵ The

⁴ Jelena Bjelica, Shrinking, Thinning, Retreating: Afghan Glaciers under Threat, January 2021, accessed at: <https://www.afghanistan-analysts.org/en/reports/economy-development-environment/shrinking-thinning-retreating-afghan-glaciers-under-threat-from-climate-change/>

⁵ UNEP, NEPA and GEF, Biodiversity Profile of Afghanistan, June 2008, accessed at: https://postconflict.unep.ch/publications/afg_tech/theme_02/afg_biodiv.pdf

species composition of all areas has been significantly reduced due to overgrazing, fuel collection and exploitation by large herbivorous animals.

There are 3,500-4,000 vascular plant species that are native to the country. The flora varies depending on the altitude. Up on the Safed Koh alpine range, for example, at 1,800 – 3,000 meters, large forest trees – including conifers – exist. Down to 1,000 meters altitude, wild olives, species of rock rose, wild privet, acacias and mimosas exist. In the low brushwood of the Kandahar tableland plains, one can find leguminous thorny plants, including camelthorn, astragalus, spiny rest-harrow, sensitive mimosa, and orchids. In the last decades, 90 percent have been destroyed due to timber exploration.⁶

Afghanistan is home to a variety of animals. There are about 135 – 150 species of mammals, 428 – 515 species of birds, 92 – 112 species of reptiles, 6-8 amphibians, 101 – 139 species of fish and 245 species of butterflies. A total of 39 species occur on the World Conservation Union (IUCN) Red List, as globally threatened with extinction.⁷

Sensitive habitats: Afghanistan has currently not legally instituted or effectively managed protected areas. UNEP provided a list with 15 proposed protected areas, which have been proposed by different entities.⁸

Population: In 2020, 47.3 percent of the population of Afghanistan lived below the national poverty line. 34.3 percent of the employed population earned below \$ 1.90 per day. The total unemployment rate in 2020 was 11.7 percent.⁹

Following the US withdrawal from Afghanistan, following decades of conflicts and recurrent natural disasters, UN OCHA estimates that 24.4 million Afghans are in need of life-saving humanitarian assistance. In 2021, 17.7 million people were in need, and the increase is largely driven by the sharp increase in the number of people in acute food insecurity, the broad-based collapse of economic conditions and basic services. At the same time a crisis in rural livelihoods has been triggered by drought, while urban livelihoods have diminished due to the economic shock.¹⁰

Some households and individuals are particularly vulnerable, including those with extreme household debt burdens, mental and physical disability, the use of negative coping strategies, and those households that are headed by women, children, or the elderly.¹¹

Gender equality and GBV: The context around gender norms remains at the center of the political, peace and security landscape in Afghanistan, putting women and girls at the frontlines of this crisis.¹² Violence against women and girls (VAWG) is rooted in gender inequality, discrimination, and harmful cultural and social norms. VAWG and gender-based violence (GBV) is widespread with reports indicating

⁶ Wikipedia, Geography of Afghanistan, accessed at: https://en.wikipedia.org/wiki/Geography_of_Afghanistan

⁷ UNEP, NEPA and GEF, Biodiversity Profile of Afghanistan, June 2008, p. 9

⁸ UNEP, NEPA and GEF, Biodiversity Profile of Afghanistan, June 2008, p. 9

⁹ The Asian Development, Afghanistan and ADB, Poverty Data: Afghanistan, accessed at: <https://www.adb.org/countries/afghanistan/poverty>

¹⁰ UN OCHA, Humanitarian Response Plan Afghanistan, January 2022, p. 7, accessed at:

<https://reliefweb.int/sites/reliefweb.int/files/resources/afghanistan-humanitarian-response-plan-2022.pdf>

¹¹ UN OCHA, Humanitarian Response Plan Afghanistan, January 2022, p. 7-8, accessed at:

<https://reliefweb.int/sites/reliefweb.int/files/resources/afghanistan-humanitarian-response-plan-2022.pdf>

¹² Women Rights in Afghanistan, where are we now? Gender Alert UNWOMEN

56 percent¹³ women, for example, have experienced intimate partner violence. Women and girls in Afghanistan continue to face persistent discrimination, violence, street harassment, forced and child marriage, severe restrictions on working and studying outside the home, and limited access to justice. In the context of COVID-19, the risks of GBV have only increased – in Afghanistan as well as other parts of the world.¹⁴

Women are also at a particular disadvantage in accessing economic opportunities and political platforms. While the right of women to work is enshrined in the 2004 constitution, many women have reported job loss since 15 August 2021, due to new restrictions on women’s mobility and conditions on participation in the public sphere.¹⁵ Job loss has been observed across most sectors, however, women in particular professions – such as media and civil society – are reporting additional challenges due to the de facto authorities’ position on women’s right to work. It is important to note that some of the barriers to women’s participation in employment are created by lack of clarity and self-censoring by families and women in the absence of any clear directive from the de facto authorities allowing women’s full participation in the workforce. Overall, there has been an observable reversal in a women’s right to work as a result of the de facto authorities’ ascension to power with no clear plan or pathway in place for women to fully return to their jobs.¹⁶ Afghanistan ranks 180 out of 191 countries on the UNDP Gender Inequality Index in 2022.¹⁷

¹³Central Statistics Organization/Afghanistan, Ministry of Public Health/Afghanistan, and ICF (2017). Afghanistan Demographic and Health Survey 2015.

¹⁴ Afghanistan demographic survey 2015

¹⁵Reuters, Afghan women should not work alongside men, senior Taliban figure says, 13 September 2021, accessed at <https://www.reuters.com/world/asia-pacific/exclusive-afghan-women-should-not-work-alongside-men-senior-taliban-figure-says-2021-09-13/>

¹⁶ UN Women, Women’s Rights in Afghanistan. Where are We Now?, December 2021, accessed at:

<https://www.unwomen.org/sites/default/files/2021-12/Gender-alert-Womens-rights-in-Afghanistan-en.pdf>

¹⁷UNDP Gender Inequality Index, accessed at: <http://data.un.org/DocumentData.aspx?q=Gender+inequality+index&id=471>

6. Identification and Assessment of Potential E&S Risks and Impacts and Mitigation Measures

Environmental and Social Screening Process: At the activity level, each sub-project will first be evaluated against the eligibility criteria/negative list of the activities to be financed by the CRLP, E&S screening is the second step to understand the potential risks and impacts of the activity. The template for E&S screening to be applied is listed in Annex 1. The E&S Screening template has been reviewed and updated for the implementation of the AF2.

The screening results allow a filtering of the activities that are not eligible (see Annex 2) and classify eligible activities on the basis of predictable risks and impacts. All activities that are not sustainable due to their location or because they represent risks and impacts that are neither avoidable, mitigable nor compensable are not to be financed by the project.

The E&S screening form further guides the relevant plan that lists relevant mitigation measures for the activity (e.g., the Project ESMP, the GBV/SEA/SH Action Plan, chance find procedures, Labor Management Procedures (LMP), etc.). It also helps determine the need for the implementation of further E&S mitigation measures, for example in the form of site-specific ESMPs. The site-specific ESMP can be developed based on the template ESMP which is annexed in the ESMF and other E&S instruments.

For the rural component, the E&S screening process is led by the FPs' - E&S Specialists in close cooperation with the UNOPS PIU E&S Specialist based in the field Offices. When FPs complete the E&S Screening Forms, they upload it to the project MIS. UNOSP PIU conducts spot-checks of the FPs' screening forms in the MIS to ensure that the E&S instruments have been properly prepared by the FPs.

For the urban component, the E&S screening process is led by the UNOPS PIU E&S Specialist based in the field Offices. The team submits the screening forms to the E&S specialist in Kabul for review.

In general, the project team anticipates and avoids risks and impacts where possible. Where this is not possible, it aims to minimize or reduce the risks and impacts to acceptable levels. Where significant residual impacts remain, they are compensated or offset where feasible. If this is not possible, the activity is not implemented.

Climate Adaptation and Resilient Infrastructure Measure: The project will strengthen its climate adaptation focus by integrating practical, infrastructure-based adaptation measures within its civil works and rehabilitation activities, in line with the ESMF framework. These measures target key climate risks relevant to the project context, particularly flooding, soil erosion, heat stress, and environmental degradation in vulnerable rural and urban areas.

Climate adaptation will be addressed primarily through resilient community infrastructure, including the construction and rehabilitation of check dams, flood protection structures, retaining walls, improved drainage systems, and concrete streets, all designed to manage surface runoff, reduce flood impacts, stabilize slopes, and protect communities and assets from extreme weather events. Design standards

and mitigation measures will be proportional to site specific climate risks identified during E&S screening and reflected in the generic or site-specific ESMPs.

In addition, the project will promote nature-based and greening measures as part of rehabilitation works, such as tree planting, grass cultivation, and restoration of public parks and green spaces, to reduce erosion, improve microclimate conditions, enhance water infiltration, and strengthen long term climate resilience. These measures will also contribute to improved environmental quality and community well-being.

All climate adaptation measures will be screened, adapted, and monitored at the subproject level through the ESMF process, ensuring flexibility while systematically mainstreaming climate resilience into project implementation without introducing high risk or ineligible activities.

Project ESMP Template: The table matrix in Annex 1 contains a detailed mitigation action plan for Project ESMPs. It identifies prevention, minimization, mitigation and compensation measures for each activity. The mitigation table serves as a reference on potential risks and impacts, associated international industry best practices, mitigation measures and indicators or outcomes that can be planned and implemented throughout the project. The risks and impacts, mitigation measures and monitoring indicators were sorted by ESS.

Site-Specific Mitigation Measures: The ESMP template is used as a basis to develop the site-specific E&S mitigation measures for specific activities or sets of activities, based on E&S risk screening. Proposed measures in the ESMP Template are general measures based on best industry practices, including those in the General EHS Guidelines. Each activity takes place in a specific context and has specific characteristics, which is considered in the preparation of site-specific E&S mitigation measures, for example site-specific ESMPs, which should be in place before any construction activity (including land clearance, contractor mobilization, etc.) take place. Depending on the level of anticipated risks and impacts, other mitigation measures may be added, and monitoring mechanisms adjusted prior to sub-project commencement. See Annex 1 for a template to be completed alongside the sub-project plans.

Labor Management Procedures: The project is associated with labor risks and impacts, given the different types of workers it deploys for rehabilitation works. These include OHS issues, child and forced labor, labor disputes, discrimination and exclusion of vulnerable/marginalized groups and GBV related issues. In order to mitigate these risks, specific LMP have been developed (see Annex 4). The purpose of the LMP is to establish clear labor procedures for all project workers, namely direct project workers, contracted workers, primary suppliers' workers, and community workers, in line with the requirements of the local legislation and the World Bank's ESS2.

In line with OHS requirements, a personal protective equipment (PPE) proposal is provided in Annex 7. Please refer to this annex for detailed information regarding the required PPE and first aid kit items for activities under C1 sub-project, ensuring alignment with environmental and social management practices.

Chance Find Procedures: ESS8 is not relevant in the project context. However, since Afghanistan has a rich cultural heritage, there are risks of impacting cultural goods during rehabilitation works in specific locations. To mitigate these risks on cultural heritage a Chance Find Procedure was developed (see Annex 5).

SEA/SH Action Plan: To mitigate any SEA/SH-related risks and impacts of project activities, a SEA/SH Action Plan has been prepared. The plan contains a tailored channel to handle SEA/SH grievances and proposes prevention mechanisms. It is strictly followed by all project implementers.

Human and Security Risk Management: In accordance with the World Bank Environmental and Social Framework (ESF), ESS1 and ESS4, the Project integrates Human Security Risk Management into its environmental and social risk management procedures.

The Project follows the World Bank Group Human Security Guidelines for WBG Partner Agencies in Afghanistan (February 2026). These Guidelines establish minimum security requirements and provide a structured approach for the preparation and implementation of Security Risk Assessments (SRAs) and Security Management Plans (SMPs), consistent with the ESF and the Environmental and Social Incident Response Toolkit (ESIRT).

Project level Security Risk Assessments shall be customized to the specific operational geography, activities, workforce, affected communities, and lifecycle of the Project. Based on the assessed level of risk, proportional Security Management Plans should be prepared and implemented, as applicable. Security measures shall be cascaded, where relevant, to implementing partners in line with contractual arrangements and the Environmental and Social Commitment Plan (ESCP).

Given that the Project does not engage armed security personnel and only limited unarmed guards may be used for basic access control, security-related risks to project-affected communities under ESS4 are currently assessed as negligible or non-existent, unless the security context materially changes. Human security risk management measures shall be implemented, monitored, and reported in accordance with the ESF and the ESCP.

Stakeholder Engagement and Disclosure: A separate Stakeholder Engagement Plan (SEP) was prepared for the project. The SEP defined a structured, purposeful and culturally appropriate approach to consultation and disclosure of information, in accordance with ESS10. UNOPS recognizes the diverse and varied interests and expectations of project stakeholders and seeks to develop an approach for reaching each of the stakeholders in the different capacities at which they interface with the project.

Project Grievance Redress Mechanisms (GRM): The United Nations in Afghanistan has a well-established Grievance Mechanism in place, Awaaz Afghanistan (Awaaz), which is implemented by UNOPS on behalf of various UN and humanitarian response agencies. Awaaz is a collective accountability and community engagement initiative that functions as a toll-free, countrywide hotline number (410) that affected populations can dial to access information and register feedback on humanitarian assistance programs. As a two-way communication channel, needs and priorities as reported on the ground are circulated to partners to help improve the quality of programming in Afghanistan. Awaaz is based on common principles, has processes and policies for receiving and handling complaints and feedback, as well as for data protection; and includes inter-agency referral mechanisms. It is designed to be accessible, collaborative, expeditious, and effective in resolving concerns. Awaaz has ten multilingual operators (50% of which are women) and has handled more than 201,412 calls since Awaaz took its first call in May 2018. Awaaz agents speak Dari, Pashto, Urdu, English and more. Establishing referral pathways with clusters and partners, cases requiring attention are shared (in agreement with the affected person) in a timely

manner, helping the humanitarian response to swiftly align its delivery to actual needs. More information about Awaaz can be found at Awaaz Afghanistan (<https://awaazaf.org>).

Based on lessons, three-tiered Grievance Redressal Sub-groups (GRSs) have been established. The first tier is the GRS at the community level, the second tier is at the FP, and the third tier is a national level GRS operating through UNOPS' mechanisms. There is a provision for appeals, and any aggrieved party is able to directly approach the national level GRS as well. The formation of the GRSs was done prior to the commencement of project activities based on consultations.

While the Awaz and other existing mechanisms were leveraged for this project, in order to address other requirements of ESS10, the system was augmented for the purposes of this project in accordance with the principles given above and the following steps:

- **Step 1: Uptake** – Project stakeholders are able to provide feedback and report complaints through several channels. The aggrieved party is able to select the most efficient institution, the most accessible means of filing a grievance, and is able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she is able to bypass some grievance channels that are perceived as potentially not responsive or biased. The means to file a grievance include a toll-free hotline, email, filling up grievance forms, verbally, sending a letter, to implementing agencies, via the implementing institutions' websites, helpdesks and collection boxes stipulated for walk-ins at the sites of project activities. Anonymous grievances can also be raised. All uptake channels should permit grievances in Dari and Pashto as well.

A help desk has been set up by the respective facilitating partners during the implementation of sub-project activities in an area manned proportionate to the nature of the activity. At the help desk, aggrieved parties can inquire about project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the Help Desk.

Relevant assigned CRG members are available on each sub-project site. They are requested to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public. The first point of contact for all potential grievances from community members is the CRG member. The CRG member is required to accept formal grievances; or they can guide aggrieved people to the Hotline Operator's number, the Help Desk or Suggestion Box.

The staff manning help desks, CRG members and those operating the toll-free hotline number are trained by the PIU for (a) the registration of a grievance; (b) the interaction with complainants; (c) appropriate responses to SEA/SH issues; (d) grievances of workers; and (e) Project components and FPs.

- **Step 2: Sorting and processing** – All grievances received are transferred to the GRM Focal Point at the respective implementation partner at local or national level and the PIU. The GRM focal point categorizes the complaint and forwards it to the responsible unit. The GRM focal point also records grievances in the same format as used at the PIU.

- **Step 3: Acknowledgement and follow-up** – Within three (3) days of the date a grievance is submitted, the GRM focal point communicates with the aggrieved and provides information on the likely course of action and the anticipated timeframe for resolution of the grievance. The information provided to aggrieved also includes, if required, the likely procedure if the grievance had to be escalated outside the unit and the estimated timeline for each stage.
- **Step 4: Verification, investigation, action and documentation** – This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the validity of the grievance and then developing a proposed resolution. Many or most grievances are resolved at this stage. All activities taken during this and the other steps are fully documented, and any resolution logged onto the register. In case the grievance is not resolved at this stage, it is escalated to the next tier.
- **Step 5: Monitoring, Evaluation and Reporting** – Monitoring refers to the process of tracking grievances and assessing the progression toward resolution. Each implementing agency maintains a grievance register and records all steps taken to resolve grievances or otherwise responds to feedback and questions. GRM data is collated and reported monthly at all levels.

The TPMA provides independent operational reviews of overall project implementation and project results, including the implementation of SEP and GRM. The PIU synthesizes all reporting by TPMA and FPs, as well as its own findings, and produces an overall environment and social progress report with a distinct section on stakeholder engagement in line with a template to be provided. The project provides quarterly reporting.

- **Step 6: Providing Feedback** – This step involves informing those who have raised complaints, concerns or grievances the resolutions to the issues they have raised. Whenever possible, complainants are informed of the proposed resolution in person, which gives them the opportunity to ask follow-up questions. If the complainant is not satisfied with the resolution, he or she is informed of further options. GRM does not prevent access to judicial and administrative remedies. Each complaint must be closed within thirty (30) days of receipt - either resolved, withdrawn or escalated.

Security Risk Management: Security risk management processes are laid out in the Project Operations Manual (POM).

Responsibility Matrix Table

The overall responsibility and accountability for environmental and social risk management lie with UNOPS; however, the following matrix delineates the roles and responsibilities of the FPs and UNOPS with respect to E&S management including the preparation of various instruments at the subproject level.

In the table below, the “Responsible” means the party holds the primary duty or obligation to oversee, manage and ensure the success of the E&S management and process, while the “Accountable” means

that the party is accountable for the management and making decisions , taking appropriate actions, providing necessary resources and ensuring that the E&S risk are identified, assessed, and mitigated.

Table: Component 1 - Rural

Responsible (R), Reviewed (Re), Accountable (A), Informed (I), Consulted (C), Implemented by (Im)

S/N	Activities	UNOPS	Facilitating Partners	Remarks
1	Ensure Environmental and Social (E&S) + Occupational Health and Safety (OHS) requirements are included in the Contracts with FPs.	R, A	Re, Im	WB reviews the progress related to the implementation of ESS/ESCP during the Implementation Support Missions
2	Conduct E&S+OHS ToT training and refresher training for FPs	R, Im	I, C	
3	FPs to hire and maintain a full-time E&S Specialist and make adequate resources available to conduct subproject E&S screening and implement E&S+OHS risk management measures following the ESMF and ESMP	Re, C	R, Im, A	
4	Screening the subproject against the "Project Negative Checklist"	Re, C	R, Im, A	
5	E&S screening process to be carried out for every subproject, to identify the E&S related risks, and appropriate mitigation measures to be proposed and implemented at the site	Re, C	R, Im, A	
6	Upload the E&S screening to the CRLP - MIS as part of the subproject proposal.	Re	R, Im, A	UNOPS to carry out Quality Assurance spot-checks and review the FPs' E&S
8	Monitoring: The FPs monitor the implementation of E&S mitigation measures.	Re, C	R, Im, A	UNOPS will undertake field missions and review documentation on a spot-check basis to ensure compliance of all implementers with the E&S instruments. FPs have to monitor and

				supervise their subcontractors and suppliers in view of E&S compliance.
9	Reporting	Re, C	R, Im, A	FPs to submit monthly and tri-annual reports to UNOPS UNOPS to submit tri-annual reports to the WB
10	Cascade E&S+OHS training to all the CRGs and laborers and keep the training records at the site.	Re, C	R, Im, A	UNOPS to review the training records during spot-checks
11	Preparation of the Code of Conduct (CoC)	R	Im, A	WB reviews the progress related to the implementation of ESS/ESCP during the Implementation Support Missions
12	Sign the CoC by the FPs' staff	Re, C	R, Im, A	FPs to provide CoC orientation to the Labroads and ensure that all workers understand the CoC. FPs also to maintain records of the orientation AIB staff engaged under the project will be required to sign and comply with the Project Code of Conduct and will receive orientation on the CoC from UNOPS / FPs.
13	FPs to provide the required Personal Protective Equipment and first aid kits to the workers based on the	Re, C	R, A, Im	WB reviews the progress related to the implementation of ESS/ESCP during the

	PPE+first aid kit proposal.			Implementation Support Missions
14.1	Incident Report: Prepare and submit Incident reports to the UNOPS and discuss them in coordination meetings as needed.	Re, C	R, Im, A	
14.2	Incident Report to the WB	R	C,I	
14.3	Implementation of the incident corrective action Plan	Re,C,I	R, Im	

Table: Component 2 - Urban

S/N	Activities	UNOPS	Urban Contractors	Remarks
1	Screening the subproject against the "Project Negative Checklist"	R, A	Im	WB reviews the progress related to the implementation of ESS/ESCP during the Implementation Support Missions
2	E&S screening process is to be carried out for every subproject, to identify the E&S related risks.	R, A	Im	
3	Site specific ESMP proportional to the size and risks identified for the subproject to be prepared with the appropriate mitigation measures. proportional to the size and risks identified for the subproject.	R, A	Im	
4	ESS requirements in the contract documents: Ensures all Bidding Documents and contracts contain references to the compliance requirements of all implementers with the E&S instruments, as well as specific E&S risk mitigation measures and budgets for implementation included in civil works contracts.	R, A	Im	
5	Contractors are obliged to cascade any of ESS requirements and responsibilities to their respective sub-contractors and suppliers.	Re, C	R	

6	Monitoring: UNOPS to monitor the implementation of E&S mitigation measures. It will undertake field missions and review documentation to ensure compliance of all contractors with the E&S instruments and specific activity-related mitigation measures.	R, Re, A	Im	
	Reporting: UNOPS submitting tri-annual reports to the WB	R	C	
6	Ensure Environmental and Social (E&S) + Occupational Health and Safety (OHS) requirements are included in the Contracts with Contractors.	R, A	Re,Im	
7	Conduct E&S orientation + refreshing training including OHS for the Contractors	R, A	Im	
8	Cascade E&S + OHS training to all the laborers and keep the training records at the site.	R,A	R,Im	UNOPS provides the first E&S+OHS training to the workers. The Contractor then provides refreshers to the works during the project implementation
9	Contractors key staff + Laborers to sign the Code of Conduct (CoC) to effectively follow OHS rules	Re	R, A	WB reviews the progress related to the implementation of ESS/ESCP during the Implementation Support Missions.
10.1	Incident Report: Prepare and submit Incident reports to the UNOPS and discuss them in coordination meetings as needed.	Re	R	AIB staff engaged under the project will be required to sign and comply with the Project Code of Conduct and will receive orientation on the CoC from UNOPS / Contractors.
10.2	Incident Report to the WB	R	C,I	
10.3	Implementation of the incident corrective action Plan	Re,C,I	R, Im	

7. Institutional arrangements and Monitoring and Evaluation

Institutional Arrangements: UNOPS is contracted directly by the World Bank. UNOPS is responsible for overall coordination, procurement arrangements with local organizations and contractors; engagement with communities; fiduciary, staffing, training, and E&S management; quality assurance; monitoring and reporting; and managing technical assistance activities. Under the rural component, it implements through the network of Facilitating Partners (FPs), building on lessons learned from the World Bank's longstanding engagement in Afghanistan. Under the urban component, it is implemented through local private contractors engaged through open competitive bidding. Experience in the Cities Investment Program (CIP) and Afghanistan Eshtegal Zaiee Karmondena Project (EZ-Kar) has shown good contractor capacity for public works. By engaging them, the project helps sustain their capacity. The local community and Community Representative Groups (CRGs) are involved in the selection of interventions and oversight.

UNOPS houses the PIU. The PIU includes staff supporting several key functions: program and contract management, financial management, procurement, social mobilization and training, engineering, reporting, monitoring and evaluation, regional coordination, gender, grievance redress, and environmental and social risk management.

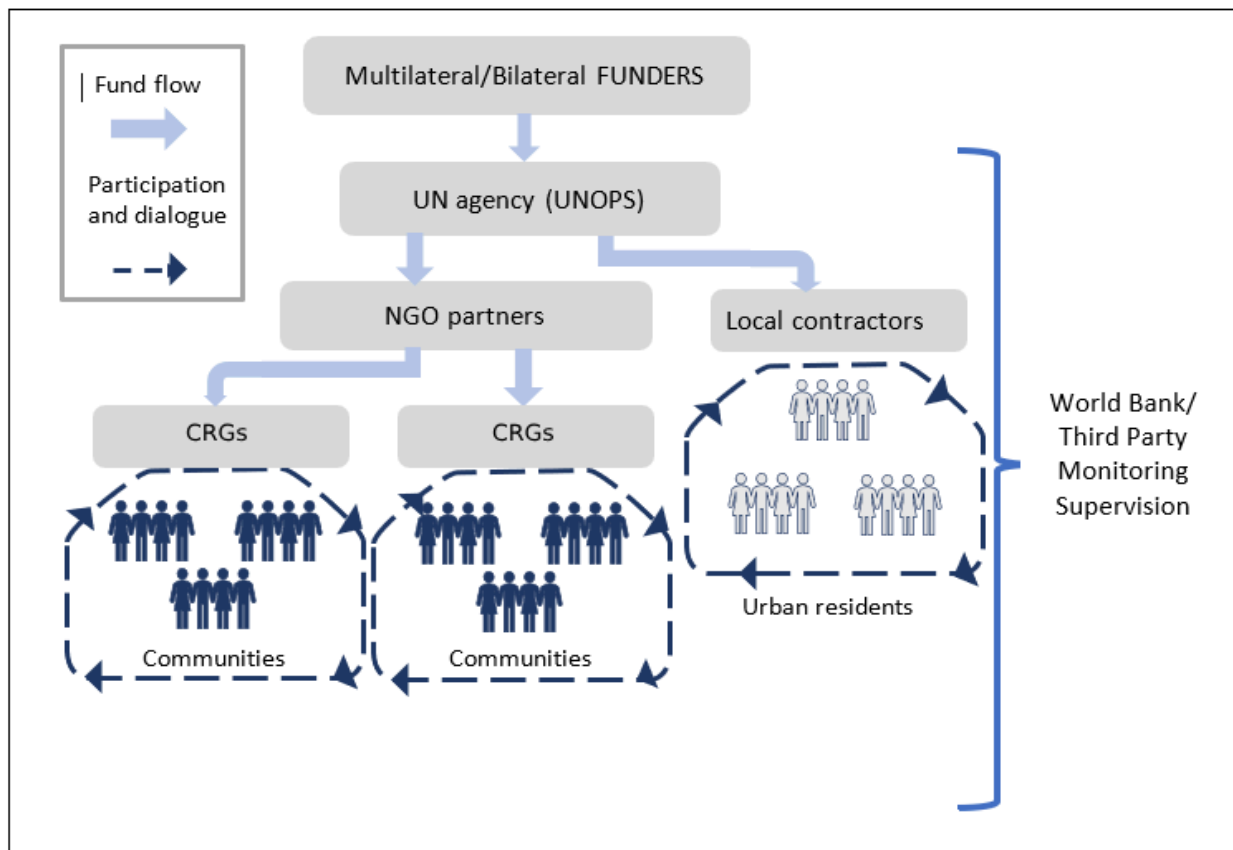


Figure 1 Flow of Funds

NGO partners (FPs) administer the grants on behalf of the CRGs, rather than transferring grants to CRGs' bank accounts.

The UNOPS PIU hired 1 Environmental and Social Specialist under the Parent Project and AF1 at the national level which will be retained for the AF2. The Project recruited 2 Environmental & Social Specialists for rural component and 5 Environmental and Social Specialists for Urban Component at the provincial level for the AF1 and will be maintained for AF2 to strengthen monitoring and implementation of the ESMF in the rural and urban components, and delivery of training sessions to the contractors and FPs. E&S personnel at national and regional levels report directly to the Project Implementation Unit (PIU). The team operates independently and has the authority to assess and act on risks without external influence. No individual or entity may compel E&S staff to bypass or violate established E&S policies or procedures.

Four regional security focal persons hired under the Parent Project will be retained and continue under the AF2 who will support FPs and urban Contractors in the overall security risk management. Please refer to Table 1 regarding the organization structure.

The E&S personnel are responsible for the monitoring and supervision of all implementers to ensure compliance with all E&S instruments. They further receive regular reports on E&S issues from all partners and prepare quarterly E&S reports for the World Bank.

The 2 GRM Senior Associates hired under the Parent Project will be retained to lead the implementation of the Project GRM, jointly with GRM focal points of the FPs.

Each of the contracted FPs and urban contractors hires and maintains a full-time E&S Specialist and makes adequate resources available to conduct sub-project specific environmental and social risk screening and implement EHS risk management measures following the ESMF provision and actions under generic ESMPs.

Monitoring and Evaluation: The main objective of monitoring the implementation of E&S mitigation measures and outcomes is to ensure that this ESMF as well as other project E&S instruments are implemented and complied with by all project partners. This objective covers the whole project cycle. Monitoring activities are carried out by the PIU E&S staff with the assistance of the M&E Officer. The staff monitors all above-mentioned E&S-related indicators (see ESMP table), as they are applicable to the respective NGO or contractor implementing the sub-project. Depending on the sub-project specific risks and impacts, additional mitigation measures and indicators may be defined. Monitoring largely consists of document review as well as supervision or spot checks in the project locations.

For all types of incidents and accidents, the reporting and subsequent investigations will be in accordance with the ESIRT (Environmental and Social Incident Response Toolkit). The timelines for initial communication of the incident and carrying out the investigation and root cause analysis will be in accordance with agreements under the ESCP.

A Third-Party Monitoring Agent (TPMA) helps supervise activities and ensure that funds reach the intended beneficiaries and activities remain independent of government control. The TPMA activities include monitoring of field level E&S management, mitigation measures, and compliance with all E&S

instruments by all implementers. The WB has set up its largest Third-Party Monitoring Program (TPMP) in Afghanistan, covering fiduciary controls and project oversight as well as close monitoring on the ground. The existing TPMP uses digital platforms to enhance transparency and accountability.

Lastly, CRGs help with community monitoring, local accountability mechanisms and grievance redress. CRGs have appointed monitoring and grievance focal persons who provide regular reports to FPs about progress and citizens' feedback.

The M&E system is based on a rigorous monitoring and reporting schedule, which includes reporting by all FPs.

Role of AIB in Digital Wage Payments: AIB will support the project in the digital payment of labor wages through biometric verification. The bank will conduct worker biometric registration, make wage payments to laborers at the project site or designated bank payment points, and maintain payment records. These records will be shared with UNOPS and the Facilitating Partners (FPs) for verification, reconciliation, and monitoring purposes.

8. Estimated Budget for ESMF

The implementation of this ESMF incurs the following estimated costs. The security risk management costs are calculated separately.

Table 1. Budget ESMP Implementation

E&S Activity	
Hiring of environmental and social experts	
<p>Maintain a PIU with qualified staff and resources to support management of the environmental and social risks and impacts of the Project including:</p> <ul style="list-style-type: none"> - 1 Environmental and Social Specialist based in Kabul (PIU); - 2 Environmental and Social Specialists for C1 based in the regions to strengthen ESHS management and monitoring on the rural side and delivery of training sessions for the implementing partners. - 5 Environmental and Social Specialists for C2 based in regions to strengthen monitoring on the urban side and delivery of training sessions. - 1 Diversity and Inclusion Officer (Gender) for CRL Project. - 1 Diversity and Inclusion Officer for CASA 1000 Project - 2 GBV training consultants for CASA 1000. - 2 GRM Senior Associates to maintain the GM, deliver training to FPs and contractors; and - 4 Regional Security Associates. <p>Each of the implementing partners will hire one E&S and one Health and Safety Officer and urban contractors will hire and maintain a full-time E&S Specialist and make adequate resources available to conduct sub-project-specific environmental and social risk screening and implement EHS/EHS risk management measures following the ESMF and ESMP.</p>	<p>Staff costs</p>

E&S Activity
The cost for implementation of ESMF is estimated US\$2.5M for the entire duration of the AF project and covers the following items
Training and capacity development
Implementation of training and capacity development initiatives for all 5 FPs and more than 120 contractors
Conducting E&S and OHS training to workers by FPs and Contractors
Awareness campaign
Awareness campaigns in communities by UNOPS and FPs
Consultation and disclosure
Consultation sessions in all the districts/communities/relocation sites by UNOPS and FPs
Grievance redress mechanism
GRM Hotline/uptake channel costs
Monitoring and documentation of ESMF implementation
Monitoring and supervision to verify E&S instruments are developed at sub-project level with good quality and the risk and impact mitigation measures proposed in the ESMPs are implemented adequately.
Implementation of SEA/SH Action Plan
Budget for implementation of SEA/SH Action Plan

9. Training and Capacity Building

At the project level, the World Bank will be delivering sessions on ESF to the staff under UNOPS as and when required. Refresher sessions can be delivered throughout the project implementation period.

The Training and Capacity Building Plan describes the training needs and planned training activities in order to ensure that all IPs as well as beneficiary communities are prepared for the implementation of the ESMF and other E&S instruments. Training is held to build the capacity of UNOPS staff, Implementing Partners and contractors. Based on lessons from the implementation of the parent project, capacity building for FPs and contractors has been increased in this plan.

Capacity Building Needs: The specific training and capacity building needs for UNOPS and all FPs and contractors include: a) training in the ESF and Project E&S instruments; b) stakeholder engagement; c) E&S Screening; d) OHS; e) Emergency Preparedness and Response; f) SEA/SH prevention and risk mitigation; g) Implementation, monitoring and reporting of ESMPs; h) LMP; and i) Incident and accident reporting. Training to UNOPS and all FPs is provided either by the E&S Specialists in the PIU, or by external consultants recruited for this purpose. E&S Specialists will provide ToT, to ensure that the FPs and contractors can cascade down on relevant training. In order to cascade down training, all relevant training and capacity building requirements will be included in FP and contractor legal agreements.

The specific training and capacity building needs for beneficiaries, local communities and project-affected parties will include a) Community Health & Safety issues; b) Emergency Preparedness and Response; c) SEA/SH awareness, prevention, risk mitigation and response; e GRM. This training is provided to the communities by FPs (FPs and contractors where applicable).

Additional training is provided for project workers, including community workers, Cash-for-Work workers etc. The training topics will include a) Occupational Health & Safety; b) SEA/SH awareness; c) COCs; d) Labor Management Procedures; e) toolkit talks (e.g. on PPE) incident and accident reporting, g) Workers' GRM. The training to workers is delivered by the contractors directly. Where contractors lack the capacity in a particular topic, the UNOPS PIU or the FP takes on the training of workers.

AIB staff involved in the project's digital wage payment process will also receive orientation on relevant Environmental and Social Framework (ESF) requirements, including Occupational Health and Safety (OHS), Code of Conduct (CoC), SEA/SH prevention, grievance redress mechanisms (GRM), security briefing, and cash handling procedures.

Training and Capacity Building Plan: Based on the ESCP and the identified requirements in regards to the project activities, the following training and capacity building sessions are undertaken.

Table 2. Training and Capacity Building Plan

Topic of Training	Target Group	Timeframe	Responsible for provision of training	Remarks
Training for UNOPS staff, FPs and contractors				
Training in ESF and project E&S Instruments	FPs and contractors	Prior to commencement of activities and Refreshers throughout the project implementation	UNOPS PIU	5 training for FPs and 120 training to contractors prior to the commencement of work. 10 Refresher training for FPs.
Stakeholder Engagement				
E&S Screening				
OHS				
Emergency Preparedness and Response				
GBV/SEA/SH prevention and mitigation				
Implementation, monitoring and reporting of ESMPs				
LMP				
Incident and Accident Reporting				
Training for communities				
Community Health & Safety	Communities	Prior to commencement of activities and refresher throughout the project implementation	UNOPS PIU / FP / contractor	As needed
Emergency Preparedness and Response				
GRM				
Training for workers				
Occupational Health & Safety	All project workers	Immediately upon deployment	Contractor / FP / or UNOPS PIU	As needed
GBV/SEA/SH awareness				
COCs				

Labor Management Procedures				
Toolkit talks (e.g. on PPE)				
Incident and accident reporting				
Workers' GRM				
Training for AIB staff involved in the digital wage payment process				
E&S requirements, Occupational Health and Safety (OHS), Code of Conduct (CoC), SEA/SH prevention, Labor Management Procedures (LMP), Grievance Redress Mechanism (GRM), security briefing, and cash handling Standard Operational Procedures (SOPs) related to digital wage payment services.	AIB staff involved in wage payment services	Prior to commencement of payment activities	UNOPS/FPs/ Contractors	As needed

Annex 1: Environmental and Social Screening Form, Generic ESMP and Template for site-specific ESMP

Environmental and Social Screening Form:

1. E&S Screening Forms prepared for Component 1 - Rural subprojects should incorporate the relevant proposed mitigation measures from the ESMP template (Table 4). UNOPS, through its spot checks and regular supervision, will assess the quality of E&S Screening Forms with a focus on the risk mitigation measures identified. The World Bank will review a sample of E&S Screening Forms during all implementation support missions.
2. Site-specific ESMPs are not required for C1 Subprojects. Mitigation measures will be proposed in the screening checklist
3. E&S Screening Checklists and site-specific ESMPs are required for C2-urban subprojects.

Table 3. E&S Screening Form

Sub-project ID/title:				Village/area:			
Type of Project:				District/municipality:			
Involved CRG name (if applicable):				Province:			
Start date of sub-project:				End date of sub-project:			
Nature of activity		Category of sub-project					Proposed Mitigation Measures
No	Environmental Consequences	No Risk	Low Risk	Moderate Risk	Substantial Risk	High Risk	
1	Will the implementation of project activities generate air pollution? If yes, what will be the sources of air pollution?						

2	Will the implementation of project activities generate sound pollution? If yes, what will be the sources?						
3	Will the project activities require cutting slopes and removal of earth from borrow areas?						
4	Will the activity create solid or liquid waste that cause potential contamination of surface water and groundwater supplies? If yes, what are the potential sources of solid waste and liquid waste?						
5	Are there environmentally and socially sensitive areas (protected areas, forests, national parks, wetlands, any important cultural or archeological sites) near the sub-project area?						
6	Will the implementation of project activities lead to cutting down trees and removal of vegetation? If yes, what are the next steps/actions that would be taken?						
7	Will the implementation of project-related activities threaten endangered and threatened species?						
8	Will the excavation and quarry operation affect the environment?						
9	Is the selected site exposed to floods?						
10	Is the selected site exposed to avalanches or rock fall?						

11	Will the implementation of project activities impact on the overall quality and quantity of the available water sources?						
12	Will the implementation of project activities lead to the alteration of water flow?						
13	Is the subproject diverting water from the stream that could decrease the water share of the downstream communities during implementation and operations stages?						
14	Is there enough water available all year around for running the hydropower system/and sun for water solar pumps?						
Occupational Health and Safety Consequences							
15	Is there a risk of work-related accidents? (Working at height, excavation/backfilling, Loading/unloading, Stone/brick masonry, Stone Patching/Dry Stonework, Gabion installation, Concrete work, Plastering/pointing, Canal rehabilitation/cleaning, confined space, Machinery activities, Manual handling, Graveling etc.)?						
16	Does the activity have human health and safety risks, during construction or later?						
17	Is there a security risk for project workers and assets in the area?						

18	Is there any basic health facilities nearby?						
UXO, Land Mine Consequences							
19	Is the selected site exposed to land mines, unexploded ordnance, or explosive remnants of war based on the UNMAS Map?						
20	Is the project area located in or near a region known to have experienced past armed conflict or military activity?						
21	Are local communities aware of or have they reported incidents or observations of UXO or land mines?						
22	Have any visible signs of UXO, land mines, or warning markers been observed within or near the project site during the screening?						
23	Has any clearance activity (mine or UXO removal) been undertaken in the area previously?						
24	Is there the mine action Quick Response Teams located/available in the relevant district/province?						
Social Consequences							
25	Is there a risk of vulnerable people being excluded from project benefits, such as access to jobs, improved infrastructure, training etc.?						

26	Is there a risk of child or forced labor?						
27	Is there a risk of GBV/SEA/SH for project workers or beneficiaries?						
28	Will the sub-project require land or land beyond the current infrastructure footprint (public or private, temporarily and permanently) for its development?						
29	Will the activity create conflict among the people in the local community?						
30	Will the activity be implemented in an area that will directly affect an individual or community's crops, trees, livestock or other income generating activity?						
31	Will anyone be prevented from using economic resources (e.g. pasture, fishing locations, forests) to which they have had regular access?						
32	Might the project adversely affect communities or vulnerable people living in the area?						
Check Dam Consequences							
33	Is there a risk that the dam will not get enough water due to upstream water use or irrigation reducing the water flow?						

34	Will the check dam negatively impact the species (flora/fauna) in the upstream/downstream areas (either by reducing water availability downstream or by flooding the dam area during water storage)?							
35	Will the check dam cause soil erosion (banks erosion)?							
36	How far is the community downstream, and in case of check-dam failure, how many people and key community assets (such as schools, clinics, roads, and forests) could be affected by flooding?							

Note:

(1) No risk: Mark (X) for no risk

(2) Low Risks: Mark (X) for Low risk

(3) Moderate Risks: Mark (X) for Moderate risk. Moderate risk refers to activities with manageable impacts on the environment

(4) Substantial Risks: Mark (X) for Substantial risk. Substantial risks refer to activities that involve additional support and planning, implementation and monitoring of mitigation measures in order to decrease the potential impact.

(4) High Risks: Mark (X) for High risk. High-risk activities will not be financed under the CRL Project.

Include photos of the site, where relevant.

Name of engineer/ E&S Safeguard Specialist/Social Mobilizer that filled in checklist:

Screening Date:

Signature:

Template for Environmental and Social Management Plan:

The below Environmental and Social Management Plan is generic for all sub-projects and may serve as a guide for implementers to prepare a site-specific EMSP table.

Table 4. ESMP Template

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹⁸
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
Exclusion of vulnerable groups from project benefits (such as poor women and individuals displaced by the conflict and security situation in the country).	- Implement and monitor Project GRM	X	X		- % GRM cases presented and addressed			X	Implementation /Monitoring UNOPS	
OHS-related risks: Work-related accidents (injuries, fatalities, injuries through UXOs, exposure to extreme heat or cold, contamination from unsafe water consumption, etc.) Poor working conditions: unsafe work environment	- The equipment used in the works should be routinely serviced to ensure proper and safe equipment functionality - Use of safety signage to warn contractor workers and visitors to worksites - Provision of adequate signage and communication of risk to workers and communities - Provision of first aid kits - Implement plan for the mitigation of risks through UXOs (see Annex 6)		X		- Existence of an accidents/ incident's logs - % of completion of a root/causes analysis following incidents - # of workers trained in OHS issues - Record of Safety Risk Assessment Reports - Record of safety talks conducted – as part of the OHS Plan - First aid kits are available on site	X	X		Implementation : Contractors Monitoring: UNOPS PIU	

¹⁸ The costs cannot be fully determined at this stage. They will be calculated for each activity in the activity specific ESMPs.

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹⁸
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	- Provision of PPE for the laborers under C1 based on the PPE proposal (See Annex 7)				- Lost time incidents or near miss incidents recorded - Training provided on OHS					
Child and forced labor	- Comply with the LMP (see Annex 4) including: - Set a minimum age of 18 years for all types of work (in compliance with national laws and ESS2) and document age of workers upon hiring - Conduct a track record search of the contractors at the bidding process (record of health and safety violations, fines, consult public documents related to workers' rights violations etc.) - Raise awareness of communities/suppliers to not engage in child labor	X	X		- # of violations (child, forced labor) - # of existence/maintenance of a labor registry of all contracted workers with age verification - # of awareness campaigns		X		Implementation : Contractors Monitoring: UNOPS PIU	
Dust emissions (air quality)	- Suppress dust during construction by water spraying and dampening where necessary		X		- Evidence that spraying of water is conducted		X		Implementation : Contractors Monitoring: UNOPS PIU	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹⁸
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	<ul style="list-style-type: none"> - Practice good general housekeeping at the work site; sweep off the drilled-out materials - Implement speed limit for the heavy machinery - Cover trucks carrying soil, sand and stone with tarpaulin sheets to dust spreading 				<ul style="list-style-type: none"> - # of trucks that are covered with tarpaulin 					
Waste generation (liquid, solid, hazardous), for example from use of fossil fuel-based equipment and machinery	<ul style="list-style-type: none"> - Ensure provision of waste bin on site - Efficient use of materials - Avoid and minimize waste production - Ensure waste is recycled/reused before opting to dispose - Train workers in waste management 		X		<ul style="list-style-type: none"> - # of waste bins on site - # of incidents/releases of waste - # of sanitary facilities on construction sites 		X		Implementation : Contractors Monitoring: UNOPS PIU	
Disposal and management of large amounts of excavated material generated from construction	<ul style="list-style-type: none"> - Identify designated areas for solid waste disposal - Source raw materials for construction activities based on measures specified in Good International Industry Practices (GIIPs). 		X		<ul style="list-style-type: none"> - Record of actual sites - material disposed at designated sites - Measures applied as stated in Good International Industrial Practices (GIIPs) 		X		Implementation : Contractors Monitoring: UNOPS PIU	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹⁸
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
Health and safety risks from creation of open pits following extraction of construction materials (for children and communities and breeding grounds for mosquitoes)	<ul style="list-style-type: none"> - Rehabilitation of borrow pits sites after extraction - Fence the area and post warning signs at entrance 		X		<ul style="list-style-type: none"> - % of borrow pit rehabilitated - Presence of fences - Number of incidents /injuries caused by open pits 		X		Implementation : Contractors Monitoring: UNOPS PIU	
Risks of GBV/SEA/SH for female project workers or beneficiaries	<ul style="list-style-type: none"> - Comply with the measures prescribed in the SEA Action Plan, including: - Sensitization/community awareness of project workers - Implementation of a GRM to handle these types of complaints. - Each contractor to implement CoC for the workers with specific obligations with regards to SEA/SH. - All project staff should be trained in SEA awareness programs 		X		<ul style="list-style-type: none"> - # of SEA/SH related complaints recorded - % of complaints handled in timely - % of workers that have signed CoCs. - # of SEA/SH community awareness trainings 		X		Implementation : Contractor Monitoring: UNOPS PIU	
Security Risks for project workers, sites and/or assets	<ul style="list-style-type: none"> - UNOPS to follow UN security protocols for direct workers. - Provision of security risk assessments to FPs and contractors. - FPs and contractors to provide local security protocols and demonstrate 	X	X		<ul style="list-style-type: none"> - % of FPs and contractors that provide local security plan - % of FPs and contractors that have relevant SOPs in place 		X		Implementation : UNOPS / FPs / Contractors Monitoring: UNOPS PIU	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹⁸
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	availability to relevant security SOPs									
Checkdam risks	<ul style="list-style-type: none"> - Prevent diversion or blockage of natural water flow during construction. - Avoid excavation too close to riverbanks to reduce erosion. - Protect trees / vegetation near the work area and avoid unnecessary clearing. - Prevent construction waste, soil, and cement from entering the water channel. - Inform downstream households and mark the construction area with caution signs. - Avoid construction during peak aquatic breeding periods when known. 		X		<ul style="list-style-type: none"> - # of sites where natural flow is maintained during construction. - # of sites where banks are not destabilized by excavation. - # of sites where no construction waste enters the water channel. - # of downstream communities informed before construction. 		X		<p>Implementation : UNOPS / FPs / Contractors</p> <p>Monitoring: UNOPS</p>	
Digital wage payment risks (OHS, Security, SEA/SH, and operational risks)	<ul style="list-style-type: none"> - Organize wage payment in scheduled groups to avoid crowding at the project site or bank payment point. - Coordinate with AIB Bank agents to ensure biometric verification 		X		<ul style="list-style-type: none"> - wage payments conducted through a biometric digital system. - # of workers receiving wages through AIB digital payment system. 	X			<p>Implementation : AIB Bank / FPs / Contractors</p> <p>Monitoring: UNOPS</p>	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹⁸
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	<p>and transparent wage payment.</p> <ul style="list-style-type: none"> - Ensure safety measures control during payment days to reduce OHS risks. - Ensure safe waiting areas for workers during payment. - Inform workers in advance about payment schedule, location, and procedures. - Provide Code of Conduct (CoC) awareness and SEA/SH prevention orientation to workers and payment agents. - Ensure that female workers have safe and respectful access to payment services where applicable. - Use the project Grievance Redress Mechanism (GRM) for workers to report wage payment issues, misconduct, or SEA/SH complaints confidentially. - Coordinate with local security authorities where needed to reduce risks of theft or 				<ul style="list-style-type: none"> - # Of payment related complaints received through GRM. - # of incidents related to crowd management, security, or SEA/SH reported during wage distribution. 					

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹⁸
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	robbery during payment days. - Provide basic health and safety guidance, security briefings, and cash handling procedures for staff involved in payment activities. - Ensure secure handling of workers' biometric and personal data by AIB Bank and authorized personnel only.									

Sub-project site-specific ESMP

Following the screening process, and the identification of risks and their impacts for a sub-project under C2, UNOPS will fill out the below site-specific ESMP for the specific sub-project. **This ESMP only needs to be completed in the case of low, moderate and substantial risks and impacts per the screening form.** High-risk activities will not be financed under the CRL Project.

Table 5. Sub-project site-specific ESMP template

Date:							
Project ID: Title							
Name of village / district / municipality / province:							
CRG ID code if applicable:							
Name of engineer filling in ESMP:							
Estimated Start Date of Subproject:				Estimated End Date of Subproject:			
No.	Risk or impact	Description of Mitigation Measures	Monitoring Methods	Monitoring Frequency	Monitoring results	Corrective actions required	Person responsible
1							
2							
3							
4							
5							

Annex 2: Negative Project List

The following activities cannot be financed under the project:

- ❖ Weapons, including but not limited to mines, guns, ammunition and explosives.
- ❖ Procurement of chainsaws.
- ❖ Support of production of any hazardous goods on this negative list, including alcohol, tobacco, arms, and controlled substances
- ❖ Road rehabilitation or construction into protected areas.
- ❖ Any activity with impacts on critical habitats (including Ab-i-Estada Waterfall Sanctuary; Aiar Valley (proposed) Wildlife Reserve; Dashte-Naware Waterfall Sanctuary; Bande Amir National Park; Kole Hashmat Khan (proposed) Waterfall Sanctuary).
- ❖ Any activity that would cause damage on non-replicable cultural property (including the following sites: monuments of Herat, monuments of Bamiyan Valley, archeological site of Ai Khanum, sites and monuments of Ghazni, Minaret of Jam, Mosque of Haji Piyanda / Nu Gunbad, Balkh Province, Stupa and Monastery of Guldarra, sites and monuments of Lashkar-I Bazar, Bost, archeological site of Surkh Kotal);
- ❖ Activities, equipment or materials that have alternative prior sources of committed funding.
- ❖ Political or electoral campaign materials or donations in any form.
- ❖ Salaried activities that employ children below the age of 18 years.
- ❖ Activities that unfairly exploit women or men at any age.
- ❖ Activities that increase the vulnerability of subgroups or households or increase the overall inequality of communities
- ❖ Any activity on land that has disputed ownership or tenure rights.
- ❖ Any activity that would cause land acquisition or voluntary land donation
- ❖ Vehicles (including tractors, threshers, trucks and buses)
- ❖ Any activity likely to increase social tensions and/or risk of violence beyond the given context
- ❖ Any activity with significant environmental and social impacts and risks that require ESIA
- ❖ Any other activity ruled out by the ESMF
- ❖ Any activity that requires payments to government officials or institutions.
- ❖ Any activity on land that is known or suspected to be contaminated by landmines, unexploded ordnance (UXO), or other explosive remnants of war (ERW), unless the land has been officially cleared up and certified as safe by a competent authority.

Annex 3: Examples of Contractual Clauses for Contractors

The E&S management of construction activities can only be successful if: 1) the project is well designed and the right choice for the location of the project is made; and 2) if the contractors operate within the highest E&S standards. This annex contains key elements that shall be included in all relevant bid documents, contracts and work orders. All contractors will have to be aligned with the dispositions contained in the Labor Management Procedures (Annex 4), namely on the responsibilities and requirements on SEA/SH and the Project GRM as well as requirements for workers' GRM.

Table 6. Contractual Clauses for Contractors

Thematic Area	● Content of Bidding Documents
Prohibitions	<p>The following activities are prohibited on or near the subproject site:</p> <ul style="list-style-type: none"> ● Cutting trees for any reason outside the approved construction area. ● Disturbance to any artifact with architectural or historical value; Fire building. ● The use of firearms (except by authorized security guards). ● Use of alcohol by workers.
Waste management	<ul style="list-style-type: none"> ● Waste must be treated or disposed of. ● Identify and delineate disposal areas that clearly indicate the specific materials that can be deposited in them. ● Control all construction waste (including cuttings) generated by the sub-project and dispose of it at approved disposal sites (> 300 m from rivers, lakes or wetlands). Implement initiatives for reuse, recycling and the segregation of waste. ● All materials should be confined to government land.
Borrow pits	<ul style="list-style-type: none"> ● Identify and demarcate locations for material storage and ensure that borrow pits are >50 meters away from critical areas such as steep slopes, erosion-prone soils, and areas that drain directly into sensitive water bodies. ● Limit extraction of material in authorized and demarcated borrow pits. ● Rehabilitation of quarries and borrow pits.
Cleaning and tidying up	<ul style="list-style-type: none"> ● Establish and enforce daily cleaning procedures, including maintenance of facilities and proper disposal of construction waste.
Safety during Construction	<p>The contractor's responsibilities include the protection of people and property in the vicinity of the construction area. The contractor will be responsible for complying with all national and local safety requirements and any other measures necessary to prevent accidents, including the following:</p> <ul style="list-style-type: none"> ● Mark safe access routes for pedestrians. ● Maintain vehicle speeds of 20 mph or less within the work area at all times. ● Maintain the provision of traffic signs (including paint, trestle, sign material, etc.), road marking, and separators to maintain pedestrian safety during construction. ● Conduct safety training for construction workers before starting work.

	<ul style="list-style-type: none"> ● Stop all work in cases of heavy rain or any other emergency.
Dust Control	<ul style="list-style-type: none"> ● To control dust nuisance the proponent shall: ● Keep all construction-related traffic below 15 mph on streets within communities. ● Maintain maximum speed of 20 mph in the work area. ● Minimize the production of dust and particulate materials at all times to avoid impacts on surrounding households and businesses, and especially for the most vulnerable people (children, the elderly). ● Avoid removing vegetation so that large areas are not exposed to wind. ● Spray water as needed on dirt roads, mowing areas, and the stockpiles of soil or filling material. ● Apply appropriate measures to minimize disruption from vibration or noise from construction activities.
In case of furtive discoveries of archaeological material, one should:	<ul style="list-style-type: none"> ● Stop working immediately upon discovery of any material with possible archaeological, historical, paleontological, or other cultural value, and one should announce the discoveries to Project Manager and notify relevant authorities. ● Must protect the artifacts, use plastic covers, and implement measures to stabilize the area, if necessary, to adequately protect the artifacts. ● Must prevent and punish any unauthorized access to the artifacts. ● Construction is returned only upon authorization
Labor management	Refer to LMP (Annex 4)
Environmental Supervision during Construction	The bidding documents must indicate compliance with the World Bank's E&S standards and specific E&S instruments for the project. Construction supervision requires compliance with the specifications in the environmental management plan and shall be supervised by a designated environmental focal person. Contractors are also required to comply with national and municipal regulations governing the environment, public health, and safety.

Annex 4: Labor Management Procedures

In accordance with the requirements of ESS 2, LMP were developed for the project. The LMP set out the ways in which the PIU manages all project workers in relation to the associated risks and impacts. The objectives of the LMP are to: Identify the different types of project workers that are likely to be involved in the project; identify, analyze and evaluate the labor-related risks and impacts for project activities; provide procedures to meet the requirements of ESS 2, ESS 4 and applicable Afghan legislation.

The LMP is applied with due consideration to the requirements of national laws, the interrelatedness of ESS2 with other Environmental and Social Standards in general and ESS4 in particular.

The following categories of workers have been identified for the project. The LMP applies to all categories:

Table 7. Worker Categories

Category	Description
Direct Workers	Workers are employed directly by UNOPS, including staff and consultants.
Contracted Workers	People engaged through third parties to perform work related to core functions of the project, regardless of location. Under this category are included: employees of any non-governmental implementers, including international or national FPs, CSOs or contractors.
Primary Supply Workers	People engaged by UNOPS, FPs or contractors as primary suppliers. These include, for example, suppliers of road rehabilitation materials like gravel or other goods required.
Community Workers	People employed or engaged in providing community-based project interventions.

The LMP applies to project workers including full-time, part-time, temporary and seasonal.

The forecast of the types of workers required per Project component is as follows:

Component 1: Livelihoods Support and Climate Resilience Productive Assets in Rural Areas:

Direct workers from UNOPS for the management and supervision of activities; contracted workers from the FPs and contractors for the implementation of activities (including construction / rehabilitation activities); primary supply workers for construction and rehabilitation activities; and community workers for LiWs and cash-for-work activities.

Component 2: Livelihoods Support and Services in Urban Areas: Direct workers from UNOPS for the management and supervision of activities and well as for the implementation of activities;

contracted workers from the FPs and contractors for the implementation of activities (including construction / rehabilitation activities); primary supply workers for construction and rehabilitation activities; and community workers for LiWs and cash-for work activities.

Component 3: Social Grants for Women and the Most Vulnerable in Rural and Urban Areas:

Direct workers from UNOPS and contracted workers from the FPs and contractors for the management and supervision of activities; and contracted workers for the implementation of activities.

Component 4: Strengthening community institutions for inclusive service delivery especially for women: Contracted workers from the FPs to work with CRGs.

Component 5: Implementation Support: Direct workers from UNOPS.

Component 6: SEA/SH Risk Mitigation for CASA 1000: Contractor's key and non-key staff including the workers

The LMP caters for all categories of project workers as described in ESS2. However, UNOPS staff and consultants will be subject to UN regulations, expressed in ILO conventions and specific regulations of UNOPS.

Labor Risk Assessment: As part of the labor risks and impact assessment, the following activities assist in understanding the exposure pathways. Presented here are only key risks related to workers of predictable activities:

- (a) The main activities for community workers are light works construction and rehabilitation of water supply and sanitation facilities, and community roads.
- (b) The main types of activities for contracted workers are activities in the construction and rehabilitation of water supply, sanitation facilities, community roads - including more complicated civil works (heavy equipment).

The table highlights and analyzes the potential labor related risks and impacts in view of the anticipated labor utilization and general baseline settings of the project area.

Table 8. Labor Risk and Impact Assessment

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures to be reflected in contract documents
ESS2: Labour and working conditions		
Poor working conditions: unsafe work environment	Due to the protracted conflict in Afghanistan and the weakness of formal justice institutions, employees' working conditions may be poor and the project needs to ensure that such working conditions are not acceptable. The impact is significant in that it may manifest in exploitation of the very community that the project intends to benefit, i.e. community workers, but also contracted workers may be affected. Furthermore, there is a risk of UXOs that could be accidentally found and exploded.	Supervision of contractor Labor Management Practices is essential to mitigate against this risk. A Contractor checklist is used. The project ensures rigorous workers' GRM is in place, so that workers can articulate violations of their rights and receive redress. A UXO risk management plan is attached to this ESMF.
Poor working conditions: violation of workers' rights	The implementation of the existing articles in practice may not be very strong, given the weak judicial system	The project ensures through the workers' GRM that workers can articulate violations of their rights and receive redress.
Use of child labour	Minimum age of employment in Afghanistan is 18. Children between 15-17 are allowed to work, if it is not harmful to them, it requires less than 35 hours per week and presents a form of vocational training. Prohibitions are not enforced.	The project only allows deployment- in all project worker categories - from the age of 18. The project requires the Implementation of age verification procedures by contractors for all its prospective employees
Worst forms of child labour	Children are deployed in the worst forms of child labor, including in armed conflict, commercial sexual exploitation, and forced labor in the production of bricks and carpets.	The project only allows deployment- in all project worker categories - from the age of 18. The project requires the Implementation of age verification procedures by contractors for all its prospective employees
Injuries at the workplace	The employer is obliged to provide adequate measures for health & safety protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances. However, PPE may be scarce for contracted workers or community workers, and health and safety regulations may not exist or not be enforced.	Contractor occupational risk assessments and mitigation plans be devised and implemented. Implementation of OHS Plan
ESS4: Community Safety and Health		
Labor influx and GBV	There is likely to be internal movement of people from areas outside the project areas to seek employment and associated benefits from within targeted communities. Furthermore, there is a small chance that contracted workers may be brought into communities to conduct construction works. Population movement due to labor influx may result in GBV/SEA cases.	All contractors implement the Labor Influx Management Procedure (see below); a SEA/SH Action Plan is implemented Implementation of code of conduct to be signed by project workers and enforced by all contractors

Institutional Arrangement for Implementation of LMP: As the implementation of Component activities is led by the UNOPS PIU, the PIU carries the main responsibility for the implementation and monitoring of the LMP.

For the Rural component, UNOPS ensures that the LMP is part of the GSA signed with Facilitating Partners. Under the Urban component, UNOPS prepares subproject designs and bidding documents, as well as procuring contractors. The UNOPS infrastructure team is responsible for contractor and site supervision, technical quality assurance, certification, and payment of works. The PIU ensures labor management procedures are integrated into the procurement of contracts / bidding processes. The PIU is responsible for assisting with the E&S screening process where necessary and approving screening results and subsequent E&S plans, and monitoring and supervising the implementation of all E&S risk mitigation measures, including those laid out in the LMP.

The monitoring and supervision of the implementation of the LMP rests with the E&S Specialists in the PIU, who are part of the PIU's Risk Management Team. The E&S Specialists continuously analyze labor-related risks related to the project, overseeing all FP' implementation of the LMP, and the monitoring of the same. The overall responsibility for the implementation of all E&S instruments lies with the UNOPS Project Manager of the PIU.

Key Procedures: The project is guided by the recognition of the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. It promotes sound worker-management relationships and enhances the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. UNOPS, FPs and contractors ensure the full accomplishment of the objectives of ESS2. For ease of reference, all employers are referred to as contractors. This excludes UNOPS.

Detailed Labor Recruitment Procedure under the digital payment process:

- Step 1: Labor Demand Planning: The Facilitating Partner (FP)/Contractor will determine skilled and unskilled labor needs based on BoQ and actual workload at site.
- Step 2: Labour Recruitment: Facilitating Partner (FP)/Contractor Coordinate with CRG/Gozar for local labor recruitment; complete Form 2 for rural /Form 6A for urban and collect NIDs.
- Step 3: Initial Verification: The Facilitating Partner (FP)/UNOPS CME will Review submitted Form 6A for urban and form 2 for rural and NID copies for completeness.
- Step 4: Biometric Registration and Onboarding: The AIB Bank Conduct site visits for biometric registration; assign Unique Bank ID
- Step5: Deployment Authorization: The Facilitating Partner (FP)/UNOPS Confirm onboarding and authorize labor deployment.
- Step 6: Daily Attendance Tracking: The Facilitating Partner (FP)/Contractor Record daily attendance using fingerprint and contractor stamps.
- Step 7: Document Preparation for Labour Wage: The Facilitating Partner (FP)/Contractor Compile attendance sheets, wage sheets, and verify Form 6B for rural/Form 6A for urban.

Step 8: Verification of Payment Package: The Facilitating Partner (FP)/UNOPS Cross-check labor records, sign and approve payment package.

Step 9: Submission of Payment Package: The Facilitating Partner (FP) will submit the draw notice in MIS through the rural team to the Finance section.

Step 10: Wage Distribution Coordination: The UNOPS Notify AIB, arrange space and presence for distribution.

Step 11. Wage Payment Execution: The AIB Bank Conduct wage distribution using fingerprint POS confirmation.

Step 12: Payment Data Archiving: The AIB Upload payment records to MIS and provide access to UNOPS.

Recruitment and Replacement Procedure: The objective of this procedure is to ensure that the recruitment process and placement of contracted workers (see procedure below for community workers) is conducted in a manner which is non-discriminatory and employees are inducted to all essential work-related matters. The contractor is to adhere to flexibility in the working hours of female laborers, who need to attend emergency family or childcare at the proximity of the project site as well as considering the local and cultural sensitivities (if presence).

Under the Urban component:

The contractors will carry out the selection of unskilled labor from within the vicinity of the subproject area i.e., within the boundaries of the urban community governed by a given CRG, GA, or CG. The selection process will consist of the following steps:

CRG Areas:

- The contractor will call for an application process through a public notice
- Interested and eligible unskilled laborers will self-identify within the designated timeline
- CRGs will advise on who may be included. CRGs will provide an existing list of identified beneficiaries as guidance, where available.

GA and CG areas:

- The contractor will call for an application process through a public notice
- Interested and eligible unskilled laborers will self-identify within the designated timeline

The contractor will then create a list of unskilled laborers participating in the LIW. The list should reflect the order in which self-identifications were made (especially where the number of self-identifications exceed the number of laborers needed), however, the unskilled laborers will be hired based on the numbers required for construction activities with the consultation of selected CRG/GA/CG considering equitable distribution of laborers across the Gozar. Considering the current situation and in regard to the recent returnees from neighboring countries and IDP due to flood, out of selected CRG/GA/CG will be treated separately with the confirmation and availability of supporting documents and check/verified by UNOPS.

The skilled labor will be hired from the selected CRG/GA/CG, in case of non-availability, contractor needs to obtain the confirmation of CMEs prior assigning of any skilled labor which shall be hired out of the CRG/GA/CG.

Under the rural component:

FP SOs will work with CRG members from each mohalla/ neighborhood in a given community to list all HHs in that mohalla in sequential order of location into the Form 2: Rural Community HH and Eligible HH List. It is important that returnee and IDP households in the given community are also included on these lists.

Given the limited subgrant, it is important to ensure that only the most eligible HHs benefit from inclusion under C1 or C3. To start with, an exclusion process is applied to identify the relatively better-off households, which for the purposes of this project, will be defined as a household that meets one of the following criteria:

- Owns sufficient land to meet its food needs and sell a surplus
- Has sufficient livestock to meet its food needs and generates surplus income
- Has a regular monthly income that exceeds AFA 7,500
- Owns a business that generates consistent income and
- Has sufficient income to meet its food needs during the next 3 months

If one of questions 1- 4 and question 5 is answered positively, then the household does not qualify. In this case, the household is considered better off (those that have sufficient food: have business or land and have continued to farm and sell farm produce) – these households will be excluded from C1 and C3 coverage.

Where the HH qualifies as poor and needing work with able bodied adults to provide labor, they will be listed as eligible beneficiaries for Component 1/ CFW. Where the HH is very vulnerable because it is headed by a woman, disabled persons (mentally challenged, physically challenged), by a drug addict, or is composed of very elderly persons that are incapable of providing labor, it is then listed as eligible for the social grant. Both of these eligibility are marked into the same form.

The following activities need to be considered.

1. The hiring entity submits a resource allocation plan to UNOPS for review and approval. The following details will be shown.
 1. Number of staff required
 2. Intended working conditions
 3. Intended locations of staff
 4. Job specifications in terms of qualification and experience
2. The hiring entity publishes the job invitation in the appropriate method of Public Notice or word of mouth through the head of GA & CRG/CG for community workers) to ensure all potential candidates have access to the information, including women, actively addressing risks of nepotism.

3. The hiring entity launches a self-selection process for beneficiaries from within the GA area with the consultation of Gozar Assemblies/CG (as needed). The primary implementation/management role will rest with UNOPS and the contractors. CRGs/GAs/CGs will play supporting roles as mentioned above.
4. Shortlist and recruit candidates ensuring the following.
 - As much as possible, 7 percent of the shortlisted candidates are women.
 - As much as possible, 7 percent of engaged employees are women.
 - Screen off candidates under the age of 18 years or above 65 years.
5. On recruitment and prior to engaging any labor at the project site the FP/contractor makes sure they have filled in Form 2 for rural /Form 6A for urban property for each individual and available at project site. The Contractor makes sure they have registered the secondary laborer, otherwise no one will be acceptable to work as a secondary laborer.
6. Labour-Intensive Works (LIWs) will provide 30 to 60 workdays per beneficiary household. To ensure equitable access to employment opportunities, a minimum of 30 workdays will be allocated to each household providing unskilled labor. The duration of engagement for skilled laborers will be determined based on specific project requirements and subject to confirmation by UNOPS' Construction Management Engineer (CME). Cash for Works (CFWs) will provide around 20 workdays per beneficiary household during the AF2 phase.
7. In case the laborers are working at night shift or out of the normal working hours such as project site housekeeping, they will be recorded in the normal attendance sheet like other laborers.
8. Based on the site requirement, and approval of UNOPS, under C2, the contractor may consider the Surveyor, First Aid Focal Point and machinery operator (excluded drivers) as part of the skilled labor, in addition to the project key staff e.g. PM, QC, HSSE and CLOs (Male & Female) that shall not pay from wages.
9. Before commencement of work, hiring entities will ensure employees are inducted on the essential work-related issues, which include the following.
 - Key Job Specifications
 - Terms and Conditions of Employment
 - Special Codes of Conduct
 - Disciplinary Procedures
 - Workers' Grievance Mechanism
 - Freedom to join and participate fully in natural disaster response, at the proximity of the project site, after clearance by CRL CME.
 - Key Environmental and Social aspects of the project and the ESMF
 - Emergency Preparedness
10. Maintain all such employment records available for review by UNOPS, the World Bank, or Regulatory Authority.

Occupational Health and Safety (OHS) Procedures: The objective of the procedure is to achieve and maintain a healthy and safe work environment for all project workers (contracted workers and community workers) and the host community.

1. On procurement for contractors, the PIU will avail the ESMF to the aspiring contractors so that contractors include the budgetary requirements for OHS and community health and safety measures in their respective bids.
2. The contractor will develop and maintain an OHS management system that is consistent with the scope of work, duration of contract and IFC General Environmental Health and Safety Guidelines (EHSs) on Occupational Health and Safety.
3. The contractor will adopt all E&S risk mitigation measures proposed for the subproject.
4. Contractor appoints an appropriately qualified and experienced Safety, Health and Environmental Officer whose responsibility is to advise the employer on OHS related issues.
5. The contractor provides preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances informed by assessment and plan.
6. The contractor provides for appropriate training/induction of project workers and maintenance of training records on OHS subjects.
7. Contractor documents and reports on occupational accidents, diseases and incidents within 24 hrs.
8. The contractor provides emergency prevention and preparedness and response arrangements to emergency situations including and not limited to workplace accidents, workplace illnesses, flooding, fire outbreak, disease outbreak, labor unrest and security.
9. The contractor shall maintain all such records for activities related to safety, health and environmental management for inspection by UNOPS, the World Bank, or the TPMA.

Contractor Management Procedure: The objective of this procedure is to ensure that the PIU has contractual power to administer oversight and action against contractor noncompliance with the LMP.

1. UNOPS shall avail all related documentation to inform the contractor about requirements for effective implementation of the LMP.
2. Before submitting a bid for any contract, the contractor shall incorporate the requirements of the ESMF, including the LMP.
3. Contractor to provide a Labor Recruitment Plan
4. Contractor to ensure all workers sign a Code and Conduct
5. Contractor to show evidence of OHS and Emergency Preparedness procedures
6. Contractor to submit the progress reports on the implementation of the mitigation measures, including those of the LMP, and allow the UNOPS access to verify the soundness of the contractor's implementation of the requirements of the LMP.
7. Where appropriate, UNOPS may withhold contractor's payment until corrective action(s) is/are implemented on significant noncompliance of the LMP. The following are some of the noncompliance that contractors need to take note of:

- Failure to submit mandatory progress report
- Failure to avail of inspection specified documentation pertaining to the implementation of risk mitigation measures
- Failure to notify and submit incident and accident investigation report in a timely manner
- Failure to appoint or replace a competent and experienced EHS officer
- Recruitment of nontechnical staff from outside the local community.

Procedure for Primary Suppliers: The objective of the procedure is to ensure that labor-related risks, especially child and forced labor as well as serious safety issues to the project from primary supply workers, are managed in line with the requirements of ESS2.

The PIU and all contractors/implementers will undertake the following measures: Procure supplies from legally constituted suppliers. The legal registration ensures that the company is legally obliged to comply with all applicable labor laws in Afghanistan, which makes it possible to assume mainstreaming of the labor laws within the supplier's firm. This will include ensuring evidence of: certificate of incorporation; make a physical check on the supplier's labor management system, including OHS, any past work related to environmental or occupational incidents, age restrictions (18 and above), employment is voluntary.

Procedure for Community Workers: The objective of this procedure is to ensure the community workers offer their labor voluntarily and that they are agreeable to the terms and conditions of employment.

The UNOPS, FPs and contractors using community workers will apply the following guidelines when dealing with community workers:

1. The UNOPS developed standard TOR, working times, remuneration systems (depending on the type of work), methods of payment, timing of payment, and community CoC, which will apply to all project activities. These will be developed during the project inception phase.
2. FPs and contractors have to produce a recruitment plan and have it reviewed and approved by the UNOPS
3. FPs and contractors have to meet and document resolution of meetings with the community on the intended community workers recruitment. The resolution shall include details on nature of work, working times, age restrictions (18 and above), remuneration amount, method of payment, timing of payment, individual signatory or representative signatory of meeting resolution, employment is voluntary, community CoC.
4. Contractors will have the terms and conditions discussed, explained, negotiated and documented through joint community meetings, with each community employee showing consent through appending of their signature and the resolutions or signing the attendance register of the meeting which made the employment resolutions.
5. FPs and contractors have to Induct community workers on key LMP issues, including SEA/SH, project GRM, OHS, HIV awareness, and safe use of equipment and lifting techniques.

Procedure for Non-Discrimination and Equal Opportunity: The objective of this procedure is to ensure that recruitment and treatment of project workers is based on the principle of equal opportunity and fair treatment.

The UNOPS, FPs and contractors apply the following guidelines when dealing with workers:

1. There will be no discrimination with respect to any aspects of the employment relationship, such as: Recruitment and hiring; Compensation (including wages and benefits; Working conditions and terms of employment; Access to training; Job assignment; Promotion; Termination of employment or retirement; Or disciplinary practices
2. Harassment, intimidation and/or exploitation will be prevented or addressed appropriately
 - a. Special measures of protection and assistance to remedy discrimination or selection for a particular job will not be deemed as discrimination.
 - b. Vulnerable project workers will be provided with special protection.

Grievance Redress Mechanism for all Workers: All workers, including community workers, apply for Project GRM to register any work-related grievances. Workers are encouraged to solve matters with their respective employers where possible. However, all types of workers can apply for the Project GRM at any time, where grievances can be filed directly with the FP or the PIU (in cases where they concern an FP or contractor).

The means to file a grievance includes a toll-free hotline 410, email, filling in grievance forms, verbally, sending a letter to facilitating/implementing agencies, via the implementing institution's website, and help desks. All uptake channels should permit grievances in local languages Dari and Pashto as well.

Annex 5: Chance Find Procedures

Chance Find Procedures are defined in the Law on Maintenance of Historical and Cultural Monuments (Official Gazette, December 21, 1980), specifying the authorities and responsibilities of cultural heritage agencies if sites or materials are discovered in the course of project implementation. This law establishes that all moveable and immovable historical and cultural artifacts are state property, and further:

- i. The responsibility for preservation, maintenance and assessment of historical and cultural monuments rests with the Archaeological Committee under the Ministry of Information and Culture, which has representation at provincial level.
- ii. Whenever chance finds of cultural or historical artifacts (moveable and immovable) are made UNOPS PIU should be informed, and UNOPS will bring in appropriate experts to assess the findings. Should the continuation of work endanger the historical and cultural artifacts, the project work should be suspended until a solution is found for the preservation of these artifacts.
- iii. If a moveable or immovable historical or cultural artifact is found in the countryside of a province, the provincial governor (*wali*) or district-in-charge (*woluswal*) should be informed within two weeks, and they should inform the Archaeological Committee. In case the immovable historical or cultural artifact is found in a city, the provincial branch of the Department of Maintenance of Historical Values of the Ministry of Information and Culture should be informed within two weeks (art. 18). If the findings are made within the center, the Archaeological Committee must be informed directly within one week (art. 25).

In case of a chance to find moveable or immovable historical or cultural artifacts, the implementing agency is responsible for securing the artifact from theft, pilferage and damage until the responsibility has been taken over by the relevant authorities as specified above.

These procedures must be referred to as standard provisions in construction contracts, when applicable. During project supervision, the Site Engineer shall monitor that the above regulations relating to the treatment of any chance find encountered are observed.

Annex 6: Standard Operating Procedure (SOP) for Handling Land Mines (LM), Unexploded Ordnance (UXO), and Explosive Remnants of War (ERW) at the Project Site

Afghanistan has experienced decades of conflict, and in some areas, there remains a possibility that landmines, unexploded ordnance (UXO), or explosive remnants of war (ERW) may still be present. These hazards may potentially be encountered during construction activities, particularly where work involves excavation, trenching, or other ground-disturbing activities.

During the project selection and survey stage, the potential presence of UXO/ERW risks is screened through the Project Negative List and the Environmental and Social (E&S) screening checklist.

This Standard Operating Procedure (SOP) applies in the event that any suspected UXO, ERW, or explosive item is discovered at a project site during project implementation. The SOP provides guidance to project teams, contractors, and workers on recognizing potential UXO risks and outlines the actions to be taken following any such discovery.

The purpose of this SOP is to promote awareness, support safe working practices, and ensure that appropriate procedures are followed in coordination with the relevant national authorities and mine action organizations.

Areas prone to LM, UXO and ERW:

1. Military positions
2. Military targets (Airports, factories, warehouses, bridges etc.)
3. Destroyed buildings, vehicles and equipment
4. Transport/infiltration routes (military supply routes, narrow minor roads and paths)

A rare occurrence with severe consequences:

In Afghanistan, the risk of discovering LMs, UXO and ERW on construction sites is moderately likely and the potential consequences on health, safety and environment and project cost and schedule are significant. The key risks include.

1. Injury and material damage
2. Delays and unforeseen costs to projects due to standing time
3. Site evacuations
4. Road closures
5. Reputational damage
6. Liabilities

Emergency Response Plan:

The residual risk of encountering LMs, UXO and ERW remains, and work should not start until emergency response measures are in place. These measures should be included in the sub-project's ESMP and briefed to the site teams. The Emergency Response Measures (ERM) should cover the following:

1. Identification of appropriate persons responsible: for implementation of the ERM and to undertake specified roles in case of an incident.
2. Open lines of communication: at all stages of an emergency event, it is important to keep site staff informed of what is happening. Nominated responsible persons should be

- prepared to provide briefings to the emergency services and, if required, to local residents.
3. Build a site evacuation plan: to identify how the alarm will be raised, location of evacuation routes and muster points.
 4. Create a safety cordon: the size of the exclusion zone will be determined by site conditions and the suspected nature of the object. Appropriate nominated people should supervise the exclusion zone to ensure that no one re-enters the sites once they are cordoned off upon discovery of a suspected LM, UXO or ERW.
 5. Confirmation of the status of the suspect item: only to be undertaken by the specialists.
 6. Phone tree system – Identify emergency contact information for contractors, clients, hospitals and local police.

What should you do when you discover a LM, UXO or ERW hazard on a construction site?

1. Activate the Emergency Response Measures (ERM)
2. Cease all activities
3. Evacuating the work site
4. Report the discovery to nearest police post
5. Report the discovery to UNOPS using the Flash Report template. See Annex VIII of the POM
6. Alert local residents in close proximity to the project site
7. Monitor access to the site – maintain distance, seal off the area
8. Follow the instructions and clearance activity carried out by responders in the area
9. Seek written confirmation from responders to confirm no further threats of explosives in the project area
10. Resume activities once the responders clear the area of the suspected LM, UXO, ERW
11. Submit final report, include evidence including photos to document the clearance activity

What should responsible people do in case of injuries resulting when an LM, UXO or ERW is triggered due to construction activities?

1. Cease all activities
2. Evacuate the area
3. Do not rush to the casualty
4. Clear a route to the casualty using feel and prod
5. Clear the area immediately around the casualty
6. Give first aid as necessary
7. Evacuate to the nearest medical facility at once
8. Alert the nearest police post
9. Report the incident to UNOPS – Flash Report
10. Convey further details to UNOPS as required

Post Incident:

1. Control access to project site – Use barricade tape and no entry signage
2. Delay project activities until all clear is given by Local Authority or Demining Agencies
3. Submit a detailed incident report following the ESIRT process.
4. Provide daily update about the affected person/s condition
5. UNOPS and contractor/FP to review the ERM – Reflect lessons learned
6. Resume project activities – Deliver required awareness training to project and contractor/FP personnel

Mine Action Actors in Afghanistan:

United Nations Mine Action Service (UNMAS) is the lead UN agency in de-mining. They keep updated records and maps about LM, UXO and ERW situations in the country. For information, Project teams can approach UNMAS and through them determine partners in project areas.

Hotline Numbers & Key Contacts:

Name	Hotline Numbers/Key Contact Details
United Nations Mine Action Service (UNMAS)	0730 507 007
Mine Action Program of Afghanistan (MAPA)	0708 606060
Awaaz Afghanistan	410
UNOPS - CRLP E&S Safeguards	0773204790
UNOPS Security	0797578881

Annex 7: Personal Protective Equipment (PPE) & First Aid Kit Requirements In Rural Component - AF

Roles and Responsibilities for OHS Management, PPE Provisions, First Aid Kit Management, and Enforcement:

The following two-layer framework clarifies the UNOPS and Facilitating Partners' (FPs) responsibilities with regard to the Occupational Health and Safety (OHS) management, provision of Personnel Protective Equipment (PPE) and its enforcement to be used at the project site. This structure ensures clear accountability, effective coordination, and the achievement of safety goals.

UNOPS:

- Provide capacity-building training to the FPs on the overall OHS management including the provision of PPE and First aid kits in accordance with this proposal.
- UNOPS to ensure that sufficient budget is allocated in the FPs contract to procure the required PPE and first aid kits.
- UNOPS to carry out spot checks and ensure the quality of safeguarding instruments prepared by the FPs.
- UNOPS engage with the FPs and ensure that the OHS-related awareness and training are cascaded on to the workers on the ground.
- UNOPS during the spot checks verifies the provision and use of PPE by the workers in accordance with this proposal
- UNOPS to report all types of OHS incidents to the World Bank (WB) within the specified timeline.
- UNOPS to ensure that FPs maintain good records of training for the workers.
- UNOPS to ensure that the Grievance redress mechanism is in place and can get and process grievances related to the OHS.

FPs:

- OHS risk assessment and mitigation Plan:
 - Each sub-project will first be evaluated against the eligibility criteria/negative list of the activities to be financed by the CRLP. Those sub-projects that are not sustainable in the short-, medium- and long-term due to their risk location or because they represent risks and impacts that are neither avoidable, mitigatable nor compensable will not be financed by CRLP.
 - An E&S screening process will be carried out for every site-specific activity or subproject, in order to identify its OHS risks, and based on the answers provided, the applicable mitigation measures can be determined using Table 4.
 - Site-specific ESMPs are not required for Component 1- rural sub-projects
- PPE Provision and Management:
 - Procure, distribute, and manage PPE in line with OHS requirements and this proposal.
 - Ensure PPE is appropriate, well-maintained, and replaced when damaged or ineffective.

- First Aid Kit Provision and Management:
 - Ensure that the first aid kits are available at all work locations.
 - Regularly inspect and replenish first aid kits to meet prescribed requirements.
 - Assign trained personnel to manage first aid kits and provide basic first aid assistance.
 - Ensure first aid equipment is accessible, and workers know its location and use.
- Implementation of OHS Programs:
 - Enforce compliance with the prescribed OHS guidance across all operations.
 - Maintain a safe working environment by addressing hazards and providing essential safety equipment and first aid kits.
- Training and Capacity Building:
 - Provide awareness sessions and training for the workers on the use of PPE.
 - Conduct regular refresher sessions to ensure continuous preparedness among workers.
- Monitoring and Reporting to UNOPS:
 - Track and monitor the usage of PPE and the condition of first aid kits.
 - Report incidents, including injuries requiring first aid, to UNOPS.
 - Submit regular reports to UNOPS on OHS performance, including compliance with first aid management standards.

Personal Protective Equipment:

The project successfully executed over 10,672 sub-projects (SPs) across 8,820 rural communities under the Parent Project (PP) and AF1. Despite the extensive scale of these initiatives, only 6 Occupational Health and Safety (OHS) incidents were documented.

The provision of Personal Protective Equipment (PPE) for laborers engaged in Cash for Work (CfW) activities consistently presents challenges, primarily due to the small scale of these projects, with an average budget of \$25,000. The principal criterion for selecting SPs is the 50/50 cost ratio, allocating 50% to labor and 50% to materials.

From an OHS risk perspective, it is important to note that these projects are classified as Low to Moderate risk, thereby, the provision of adequate PPEs would be proportionate to the risk and impacts arising from activities at the sub-project level.

Lesson Learned from the Parent Project:

A key lesson learned from the parent project was allocating budget for PPE and First Aid Kits in the contracts of the FPs. The budget for the provision of PPE was not anticipated by Facilitating Partners (FPs) and was not included in their financial proposal in the first place. This omission meant that the provision of essential safety gear and first aid supplies for the labor force was not considered in the initial budget, leading to unanticipated cost implications. Without these necessary safety measures included in the contracted budget, it created a gap in ensuring the well-being of the workers, which could have led to safety risks and compliance issues.

Recognizing this, the project has taken corrective action, amended the FPs' contract under the PP, and allocated budget, however, it happened late in the implementation where most of the Projects were completed under the PP.

Another key lesson from the Parent Project (PP) is that the screenings were not conducted properly such that certain risks were not captured thus leading to no mitigation measures in the S-ESMP.

The Additional Financing phase incorporated the lesson learned from the implementation of PP by explicitly allocating a budget in the FPs' contracts for the procurement of PPE and First Aid Kits, as demonstrated in the table below. This adjustment ensures that the FPs are equipped to cover the cost of these essential safety items, promoting a safer work environment and improving project compliance with health and safety standards.

Given the number of sub-projects under the AF2, (2,600 SPs in 2,153 rural communities) and the expected 241,136 laborers, providing occupational health and safety PPE for all the laborers involved in rehabilitation/construction activities remains a key challenge for the FPs due to the following reasons:

- PPE cost implications.
- Availability of PPE at the Market.

Table 1: Sector Base Outline AF2:

S/N	Sector	Total SPs AF
1	Building	10
2	Micro Hydro Power (MHP)	60
3	Irrigation	780
4	Transport	1,690
5	Water Supply	60
Total		2,600

Given the importance of occupational health and safety and managing the associated risks, the project was requested to prepare a proposal to clearly define the applicability of PPE in rural components. PPE is an essential part of the work equipment. Failure to use it could result in injury or fatality.

In accordance with the ESMF, FPs in the Rural Component, are obliged to provide adequate measures for health & safety protecting staff, workers, and communities against associated risks, including the provisions of a safe and clean work environment.

It is recognized that PPE is a scarce resource for workers and communities. However, the aim of this proposal is to achieve and maintain a healthy and safe work environment for everyone at the project site, and the host community.

The other key objective is to prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to occupational health and safety as part of the ESMF and the measures in the Generic ESMP. It shall be noted that PPE is the last resort to protect against risks. The risk controls are graded in the following order, with elimination being the most effective and PPE being the least effective:

- Elimination – physically remove the hazard
- Substitution – replace the hazard
- Engineering controls – isolate people from the hazard
- Administrative controls – change the way people work
- PPE – protect the worker with equipment

The Occupational Health and Safety PPE include the following but are not limited to:

- **Hard Hat:** When there is a risk of falling or flying objects, or due to striking against objects.
- **Safety goggles:** Where there is a risk of eye or face injury from airborne dust or flying particles.
- **Gloves:** Where there is an accidental risk of injury like open wounds, abrasions, burns, etc.
- **Footwear:** Where there is a risk of crashing by falling objects, penetration of sharp objects, etc.
- **High visible vests:** Where there are low-light conditions and other potential hazards.

Following completion of the screening report for sub-projects and in case of any occupational health and safety risks, it is strongly recommended that the risk should be mitigated through other methods such as elimination, substitution, engineering controls, and administrative controls as it is always safer and, in most cases, cheaper to eliminate hazards rather than providing PPE.

While adequate protection against the risk of accident or injury to health, including exposure to adverse conditions, cannot be ensured by other means, suitable PPE having regard to the type of work and risks, should be provided and maintained by the FPs, without cost to the workers.

Table 2: Number of Sub-Projects for FPs - AF2

S/N	Lot (FPs)	CRG	SPs
1	Lot #1	271	330
2	Lot #2	477	580
3	Lot #3	417	500
4	Lot #4	539	650
5	Lot #5	449	540

Total		2,185	2,600¹⁹

To comply with the minimum requirements of using PPE in C1, the permissible project list activities included in the Project Operational Manual (POM) are broken down into 13 key construction activities, each with its own specific set of PPE requirements. The rationale behind the PPE guidelines is driven by both cost implications and the large number of laborers involved in the project. Given the significant workforce, careful consideration has been given to balancing safety needs and budget constraints.

For each of the 13 construction activities, the minimum PPE requirements have been proposed to ensure worker safety while keeping costs manageable. This approach aims to standardize PPE usage across different project tasks, ensuring that workers are properly equipped without incurring unnecessary expenses.

By adhering to these guidelines, the project ensures that workers engaged in construction activities are protected according to the specific risks associated with their tasks while maintaining cost efficiency. The implementation of this structured approach to PPE usage helps prevent accidents and injuries on-site, contributing to a safer and more productive working environment.

The table below shows activities of the permissible list divided into 13 main construction activities for which the required PPE is defined based on nature and risk levels.

¹⁹ This is an estimated figure for the SPs

Table 3: Main construction activities under C1

S. N	Main Activities	Minimum Required PPE	Remarks
1	Excavation/Backfilling	<ul style="list-style-type: none"> - Hard Hat - Safety Boots - High-Visibility Vest - Gloves - Face mask 	<p>If the depth of excavation is <1 m, hard hats are not required.</p> <p>If the depth of excavation is > 1m. Workers should have hardhat; hauling</p> <p>For the hard cutting, and the excavation where there are rocks, boulders, and roots of trees/plants, workers should have safety boots.</p> <p>For the excavation in soft soil and mud, normal leather or rubber shoes are acceptable.</p> <p>Gloves are required for all workers using hand tools such as pickaxes, shovels, wheelbarrows, axes, spades, etc.</p> <p>required to avoid unnecessary cost implications</p> <p>Face masks are required if there is risk of dust pollution.</p>
2	Loading and unloading of construction materials such as stone, sand, gravel, and cement	<ul style="list-style-type: none"> - Hard Hat - Safety Boots - High-Visibility Vest - Gloves - Face mask 	<p>Labors working in the loading and unloading of construction materials shall have the listed PPE.</p>
3	Stone /Brick Masonry	<ul style="list-style-type: none"> - Hard Hat - Safety Boots - High-Visibility Vest - Gloves - Safety Glasses - Face mask 	<p>Workers responsible for the construction of stone or brick masonry walls should have safety boots.</p> <p>Hard hats are required, in case there is a risk of objects falling or other hazards during Stone/Brick masonry.</p> <p>Safety glasses are required only for the workers engaged in crushing stones and bricks.</p> <p>Gloves are required for all workers engaged in stone/brick masonry activities.</p> <p>Face masks are required for the laborer working with the mixing of mortar and cement.</p>
4	Concrete Works	<ul style="list-style-type: none"> - Hard Hat - Safety Boots - High-Visibility Vest - Gloves - Face Mask 	<p>For concrete work at height or in deep canals where the depth is >1m, workers should have hard hats.</p> <p>Workers should have leather or rubber shoes.</p> <p>Gloves are required for all workers engaged in the concrete work.</p> <p>Face Mask is required for all workers engaged in concrete works</p>
5	Digging Well	<ul style="list-style-type: none"> - Hard Hat - Safety Boots - High-Visibility Vest - Gloves - Safety 	<p>All listed PPE items are mandatory when digging a well, and based on site observation/risk assessment, hearing protection devices and respiratory protection should be provided in case the laborers are in a space where their low level of oxygen such as hand wells and Karezes, with emergency arrangements also in place.</p> <p>Hearing protection if the drilling machine is used.</p>

S. N	Main Activities	Minimum Required PPE	Remarks
		Glasses - Hearing protection - Face mask	Face mask is required for laborer if there is dust pollution
6	Formworks	- Hard Hat - Safety Boots - High-Visibility Vest - Gloves	Formwork at height - a hard hat is required. Safety boots and gloves are required for everyone working in formwork.
7	Canal Rehabilitation/ Cleaning	- Hard hat - Rubber waterproof Boots - High-Visibility Vest - Rubber Gloves	For canals with a depth of less than 1m, the hard hat is not required, For canals with a depth of more than 1m, a hard hat is required Rubber waterproof boots and gloves are required for all working in canal cleaning
8	Plastering/ Pointing	- Hard hat - Safety Boots - High-Visibility Vest - Gloves - Face mask	For plastering and pointing at height or deep canals, safety boots and hard hats are required. For plastering at height. depth of <1m - Hard hat is not required. However, the workers should have leather or rubber shoes. Gloves and vests are required for everyone Face mask: to protect against inhaling dust and fine particles, especially when mixing plaster or working in enclosed spaces
9	Gabion installation	- Safety Boots - High-Visibility Vest - Gloves	All three items are required for the workers engaged in Gabion installation
10	Stone crushing	- Hard Hat - Safety Boots - High-Visibility Vest - Gloves - Safety Glasses	All items are required for the workers engaged in the stone-crushing process.
11	Stone Patching/Dry Stonework	- Safety Boots - High-Visibility Vest - Gloves - Safety	Leather or rubber shoes, gloves, and vests are required for all laborers. Safety glasses are required only for the laborer crushing stones

S. N	Main Activities	Minimum Required PPE	Remarks
		Glasses	
1 2	Painting	<ul style="list-style-type: none"> - Hard hat - Face Mask - High-Visibility Vest - Gloves - Safety Glasses 	<p>Hard hats are required where the risk of falling objects is identified.</p> <p>Other items are required for everyone</p>
1 3	Graveling	<ul style="list-style-type: none"> - High-Visibility Vest - Gloves - Face Mask Safety boots 	<p>Leather or rubber shoes including other items listed are required.</p>

First Aid Kits:


In addition to the PPE, it is essential for FPs to supply first aid kits at each of the project sites. Each industry has different first-aid kit requirements as employee and risk levels vary between the sectors. CRLP construction activities come under Low to medium risk because of the environment in which our laborers work, the substances to which they are exposed, and the type of equipment they use. A first aid kit should therefore contain content for low to mid-risk environments. OSHA does not require specific first aid kits for a given industry. Although they state that “adequate supplies should be readily available,” the idea is that the on-hand kits contain items that are as general as possible and capable of addressing most injuries that can occur in a workplace. Anything beyond that should be handled with an immediate emergency call to the nearest healthcare facility while properly using the items in the on-site kit for damage control. Considering the remote location of the sub-projects (SPs) within rural communities and the limited accessibility of health facilities, it is recommended that the following essential items be made available at every project site to ensure the provision of first aid in the event of an incident. These are the minimum supplies for first aid kit requirements to comply with regulations. The cost of the first aid package is estimated at \$15-20.







These items ensure readiness to address minor injuries and accidents on-site. Depending on the specific project risks, additional supplies may be necessary.

Role and responsibilities:

The facilitating partner (FP) is responsible for ensuring that a first aid kit is available on the sub-project sites and appointing a qualified person to manage it. The FP will either hire an experienced individual from the local community as a laborer who has prior knowledge of managing a first aid kit or if such an individual is not available, provide the necessary training to a laborer on-site.

Table 4: First Aid Kit Minimum Requirements per Community

S/N	Item	Quantity	Unit	Pic
1	First Aid Kit	1	Box	

1.2	A package of gauze roller bandages, at least 2 inches wide	1	Package	
1.3	A set of standard-sized gauze pads (4 × 4 inches)	1	Set	
1.4	Moistened towelettes to clean wounds	10	PC	
1.5	Scissors	1	PC	
1.6	Disposable gloves	10	Pair	
1.7	Wound Disinfectant	1	PC	

Conclusion:

The FPs ensure that the specified PPE, as detailed in Table 3, is provided to laborers involved in the 13 main construction activities. Additionally, essential items of the first aid kit will be supplied to sub-projects located in remote areas, particularly those far from health service centers.

Annex 8: Terms of Reference: Environmental & Social (E&S) Unit in the PIU**Key Responsibilities:**

1. Subproject Screening:
 - Review/Spot-check of the FPs' E&E document such as the negative checklist, E&S screening and mitigation measures for rural components.
 - Screen all subprojects against the "Project Negative Checklist." for the Urban component.
 - Conduct E&S risk screening for each subproject to identify potential environmental and social risks and recommend appropriate mitigation measures for the urban component.
2. E&S Compliance in Procurement:
 - Ensure all bidding documents and civil works contracts include provisions and budget for E&S mitigation measures.
3. Capacity Building:
 - Conduct E&S and Occupational Health & Safety (OHS) orientation and refresher training for FPs and Contractors. FPs and Contractors are responsible for cascading the training to all laborers and communities.
4. Monitoring and Enforcement:
 - Regularly monitor the implementation of E&S mitigation measures through field visits/spot-checks and document reviews.
 - Ensure FPs and Contractor compliance with approved E&S instruments and activity-specific mitigation actions.
5. Risk Management Authority:
 - During project scoping, high-risk subprojects shall be excluded and not be financed.
 - During implementation, the team may suspend or stop project activities if there is a risk of injury, environmental degradation, or social harm until adequate mitigation measures are enforced.
6. Incident Reporting:
 - FPs and Contractor to notify and submit incident reports to UNOPS PIU within 24 hrs.
 - Present and discuss incidents in coordination meetings as necessary.

Annex 9: E&S Documents Review Procedure

The process for reviewing Environmental and Social (E&S) documents is different for the Rural and Urban components. UNOPS has put in place an effective process for the preparation, review, approval, and sample quality check of Environmental and Social (E&S) documents for both components. The steps for each are explained below:

Rural Component:

1. At the Project Site: Site Engineers complete and sign the E&S forms (Negative Project List, Screening Form, and Mitigation Measures) based on site observations.
2. Initial Review: District/Provincial ESS Focal Points check the forms and submit it to the provincial Engineer for review.
3. Managerial Review: Provincial Managers/Engineer review and stamp the forms.
4. Data Entry: Provincial MIS Officers upload the forms into the CRLP MIS system.
5. FP E&S Officer Review: FP E&S Officers review the forms and either verify, reject, or return them for correction.
6. UNOPS spot-checks of the Forms: UNOPS perform periodic random sample reviews of 15–20% of uploaded E&S documents in the CRLP MIS to ensure the quality of the document is in compliance with the ESMF requirements. Assess completeness, risk classification, mitigation adequacy, and compliance with guidelines and provide structured feedback to FP E&S Staff via written comments.
7. Corrective Actions (if required): FP E&S Staff address any issues or gaps identified during the UNOPS spot-check review. Revise the documents accordingly and re-upload corrected documents to CRLP MIS.

Urban Component:

1. E&S Screening and Document Preparation: UNOPS Provincial E&S Staff conduct site-level E&S screening during the project scoping/survey stage, they Complete the Negative Project List, fill out the E&S Risk Screening/Assessment Checklist and develop the Site-Specific ESMP, compile and sign the full E&S package.
2. Review by E&S Specialist (PIU): Reviews the E&S package for accuracy, completeness, and alignment with project and donor requirements. Provide feedback to provincial E&S staff, if necessary.
3. Peer Review submission: The E&S package works as part of the design review package for internal Peer Review within UNOPS. Address any feedback arising from the peer review process.
4. Final E&S Package for Procurement: The PIU E&S specialist submits the finalized E&S package to the Procurement Department and makes sure that the E&S documents are complete and incorporated into the bidding package.