



**GOVERNMENT OF SINDH**  
**SCHOOL EDUCATION & LITERACY DEPARTMENT**

Karachi dated the 29<sup>th</sup> March, 2022

Ref No: SSEIP/PIU/ADB/SAEMR/\_\_\_\_\_

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**SUBJECT: SUBMISSION OF SSEIP SEMI-ANNUAL ENVIRONMENTAL**  
**MONITORING REPORT**  
**(AUG 2021-DEC 2021) (VER1.2) DATED 21-03-2022**

Dear Sir,

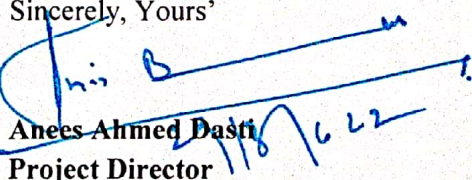
This has reference to the ongoing Project No: 51126-002 entitled "Sindh Secondary Education Improvement Project (SSEIP)", Pakistan bearing Loan No: 3845-PAK.

As part of the compliance requirement for *Environmental Safeguards* mentioned in the document "Environmental Assessment and Review Framework" prepared for the subject project; SSEIP-Project Implementation Unit (PIU) is required to submit a "Semi-Annual Environmental Monitoring Report" on a bi-annual basis.

SSEIP-PIU is pleased to submit officially its first Semi-Annual Environmental Monitoring Report for the reporting period of August 2021 to December 2021 for disclosure purposes.

We acknowledge and thank you for the support extended to Sindh Secondary Education Improvement Project, School Education & Literacy Department, Government of Sindh, in contributing towards achieving Sustainable Development Goal No. 4 i.e. "ensuring inclusive and equitable quality education".

Assuring you of our best professional services, we remain  
Sincerely, Yours'

  
Anees Ahmed Dasti  
Project Director  
Sindh Secondary Education Improvement Project

**SINDH SECONDARY EDUCATION IMPROVEMENT PROJECT (SSEIP)**

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# Semi-Annual Environmental Monitoring Report

Project Number: 51126-002  
Reporting period: Aug 2021 to Dec 2021


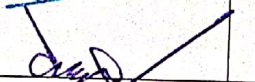
## Pakistan: Sindh Secondary Education Improvement Project

Financed by the ADB Loan 3845-PAK  
Concessional ordinary capital resources lending US\$ 75.00 million

Prepared by Tufail Ali Zubedi, Environment & Social Safeguard Specialist  
Sindh Secondary Education Improvement Project  
Karachi, Pakistan

For School Education and Literacy Department  
Project Implementation Unit-Sindh Secondary Education Improvement Project.

Endorsed by:

At SSEIP-PIU	Staff Name	Signature	Submission Date
Project Director	Mr. Anees Ahmed Dasti		21-02-2022
Project Manager	Mr. Muhammad Naveed		21-02-2022

# TABLE OF CONTENTS

<b>1. INTRODUCTION .....</b>	<b>3</b>
1.1 PREAMBLE .....	3
1.2 HEADLINE INFORMATION .....	3
<b>2. PROJECT DESCRIPTION AND CURRENT ACTIVITIES.....</b>	<b>3</b>
2.1 PROJECT DESCRIPTION.....	3
2.1 PROJECT CONTRACTS AND MANAGEMENT .....	4
2.2 PROJECT ACTIVITIES DURING CURRENT REPORTING PERIOD.....	5
2.3 DESCRIPTION OF ANY CHANGES TO PROJECT DESIGN .....	7
2.4 DESCRIPTION OF ANY CHANGES TO AGREED CONSTRUCTION METHODS .....	7
<b>3. ENVIRONMENTAL SAFEGUARD ACTIVITIES .....</b>	<b>7</b>
3.1 GENERAL DESCRIPTION OF ENVIRONMENTAL SAFEGUARD ACTIVITIES .....	7
3.2 SITE AUDITS .....	8
3.3 ISSUES TRACKING (BASED ON NON-CONFORMANCE NOTICES) .....	8
3.4 UNANTICIPATED ENVIRONMENTAL IMPACTS OR RISKS .....	8
<b>4. RESULTS OF ENVIRONMENTAL MONITORING .....</b>	<b>9</b>
4.1 OVERVIEW OF MONITORING CONDUCTED DURING CURRENT PERIOD .....	9
4.2 MATERIAL RESOURCES UTILIZATION .....	9
4.2.1 CURRENT PERIOD .....	9
4.2.2 CUMULATIVE RESOURCE UTILIZATION.....	9
4.3 WASTE MANAGEMENT .....	9
4.4 HEALTH AND SAFETY .....	9
4.4.1 COMMUNITY HEALTH AND SAFETY .....	9
4.4.2 WORKER SAFETY AND HEALTH.....	9
4.5 TRAINING.....	9
<b>5. FUNCTIONING OF THE SEMP.....</b>	<b>10</b>
5.1 SEMP REVIEW .....	10
<b>6. GOOD PRACTICE AND OPPORTUNITY FOR IMPROVEMENT .....</b>	<b>10</b>
6.1 GOOD PRACTICE .....	10
6.2 OPPORTUNITIES FOR IMPROVEMENT .....	10
<b>7. SUMMARY AND RECOMMENDATIONS .....</b>	<b>10</b>
7.1 SUMMARY.....	10
<b>Figure 1: Organization Chart of PIU-SSEIP .....</b>	<b>4</b>
<b>Table 1: Organizations involved in SSEIP Project .....</b>	<b>4</b>
<b>Table 2: PIU-ADB-TA Due-diligence Field Visit .....</b>	<b>5</b>
<b>Table 3: Training Conducted by PIU .....</b>	<b>9</b>

## Annexes:

**Annexure-I:** Training Attendance Sheet

## ABBREVIATIONS

ADB	Asian Development Bank
CWOD-PSG	CWRD Portfolio, Results, Safeguards, and Social Sector
CWRD	Central and West Asia Department
DEO	District Education Officer
DSC Firm	Design and Supervision Consulting Firm
EMO	Education Management Organization
GBPS	Government Boys Primary School
GGPS	Government Girls Primary School
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IEE	Initial Environmental Examination
NTP	Notice To Proceed
PAM	SSEIP-Project Administration Manual
PIU	Project Implementation Unit
SAEMR	Semi - Annual Environmental Monitoring Review
SDG	Sustainable Development Goals 2030
SEMIS	Sindh Education Management Information System
SEMP	Site Specific Environmental Management Plan
SEPAc	Sindh Environmental Protection Act
SESP	Sindh Education Sector Policy
SPS2009	ADB's Safeguard Policy Statement (June 2009)
SSEIP	Sindh Secondary Education Improvement Project
TA	ADB's Technical Assistance Team

## **1. INTRODUCTION**

### **1.1 Preamble**

1. This report represents the Semi - Annual Environmental Monitoring Report (SAEMR) for Sindh Secondary Education Improvement Project (SSEIP).
2. This report is the 1<sup>st</sup> SAEMR for the project covering activities for the period of August 2021 to December 2021.
3. Environment Safeguard measures in this report are limited to the preparation phase and construction phase of Output-01 only i.e. New secondary school blocks constructed, and operated under EMO program. Selection of School Site by ADB-TA and SSEIP-PM was the critical activity conducted in this time period.
4. The information provided in this report is time bound and the accuracy of facts may change with the passage of time.

### **1.2 Safeguard Survey by ADB's TA Completed.**

5. ADB's Technical Assistance Consultants have been engaged since 2019 to conduct Due-Diligence of social (IR/ IP), environmental and gender safeguards for 160 school site proposed in the PC-1 as per the TA-9410 contract available on ADB's CMS website.
6. As of 31<sup>st</sup> Dec 2021, the Technical Assistance Team members have not been able to submit their Final consolidated reports on social safeguard, Resettlement Plans, Final Initial Environmental Examination Report and Gender Reports to PIU.

## **2. PROJECT DESCRIPTION AND CURRENT ACTIVITIES**

### **2.1 Project Description**

7. Education indicators for Pakistan indicate low adult literacy rate, low expected years of schooling, considerable challenges in access to education and quality of education.
8. Educational challenges in Sindh are more acute than in other provinces of Pakistan generally which in addition also include poor quality education, and weak education governance and management.
9. The project will support the strengthening of inclusive growth, which is a key objective of ADB's strategy.
10. The Project will contribute towards SDG-4 (Ensure Inclusive and equitable quality education and promote lifelong learning opportunities for all); and SDG-5 (Achieve gender equality and empower all women and girls).
11. Sindh Secondary Education Improvement Project (SSEIP) will support reforms initiated by Government of Sindh in the education sector as a result of major challenges faced at post-primary level in Sindh.
12. SSEIP is aligned with Sindh Education Sector Policy (SESP) 2014 -2018 (and subsequent SESP 2019- 2023) as it will support investments and capacity building in secondary education throughout the province of Sindh.
13. The project has 3 outputs which are given as follows:

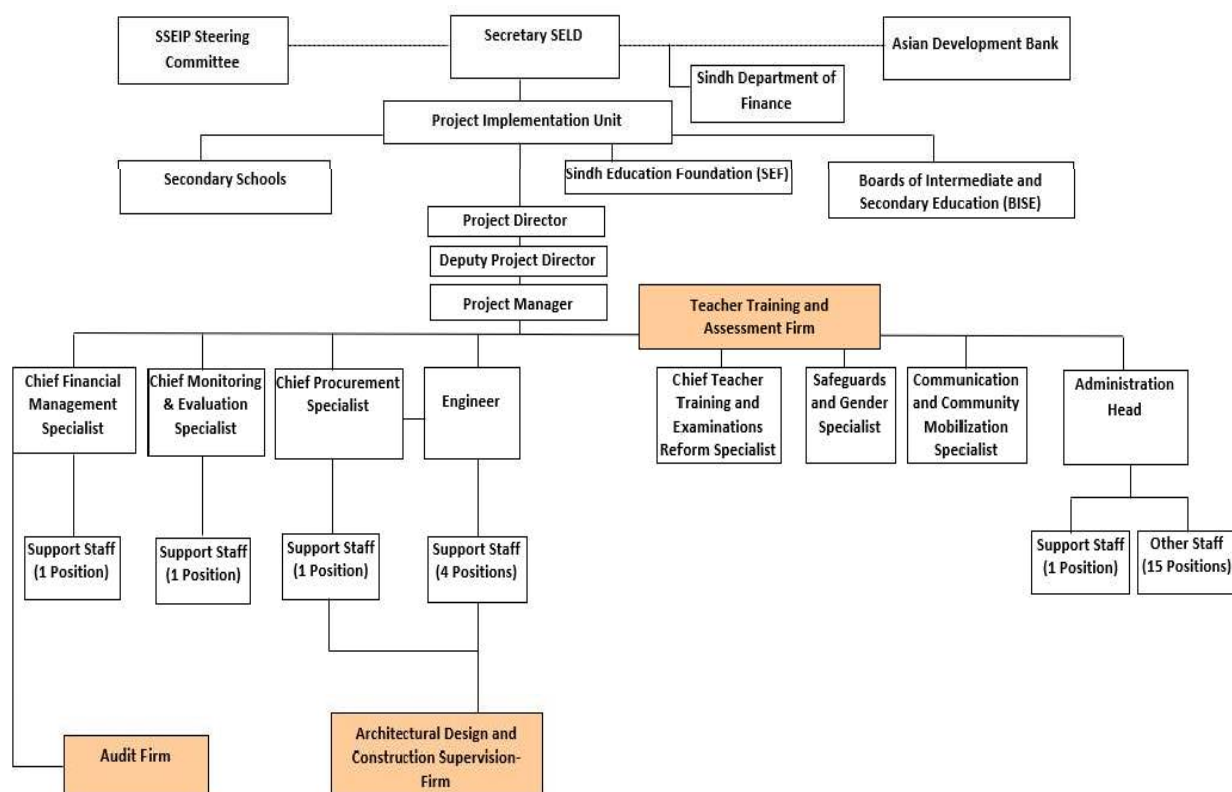


Output-01: New secondary school blocks constructed, and operated under EMO program

Output-02: Teaching capacity in five key subjects improved

Output-03: Secondary education examination system strengthened

14. Project Organization Chart has been extracted from Project Administration Manual and reproduced below as **Figure 1**.



Note:

Project Implementation Unit staff will be funded out of the SSEIP Loan as part of Project Management  
 All support staff are to be financed by the Government of Sindh as contribution to the project  
 Executing Agency will be SELDP  
 Implementing Agency will be PIU

*Figure 1: Organization Chart of PIU-SSEIP*

## 2.1 Project Contracts and Management

15. Following is a list of main organization involved in the project with names of Safeguard Specialists.

**Table 1: Organizations involved in SSEIP Project**

Role	Organization	Safeguard Specialist
Lender	Asian Development Bank	<ul style="list-style-type: none"> <li>Syed Asim Ali Sabzwari, Mr. (Environmental Specialist CWOD-PSG)</li> </ul>

Role	Organization	Safeguard Specialist
Technical Assistant	ADB's TA	<ul style="list-style-type: none"> <li>Mr. Azeem (Social Safeguard Specialist) / Team Leader</li> <li>Ms. Saira Tajdar (Environmental Specialist)</li> <li>Ms. Tahira Gunjial (Gender Specialist)</li> <li>Mr. Maqsood Bhatti (Social Safeguard Specialist)</li> </ul>
Executing Agency	School Education and Literacy Department, Government of Sindh	-
Implementation Agency	Project Implementation Unit Sindh Secondary Education Improvement Project	Mr. Tufail Ali Zubedi (Environmental and Social Safeguard Specialist).  Gender Specialist = Vacant
Design & Supervision Consulting Firm	Engineering Consultants International (Pvt.) Ltd.	<u>Design Phase</u> <ul style="list-style-type: none"> <li>Mr. Muhammad Haseeb (Environmental Safeguard)</li> <li>Mr. Sohail Haider (Social Safeguard)</li> </ul> <u>Supervision Phase</u> <ul style="list-style-type: none"> <li>Mr. Ahmed Zohair Siddiqui (Environmental Safeguard)</li> <li>Mr. Kashif Afzaal (Social Safeguard)</li> </ul>

## 2.2 Project Activities During Current Reporting Period

16. PIU coordinated ADB's TA for Social, Environmental and Gender Due-diligence activities for PC-1 proposed school sites and additional schools proposed by respective DEOs as per the following schedule, given in **Table 2** in the reporting period of Aug 2021 to Dec 2021:

**Table 2: PIU-ADB-TA Due-diligence Field Visit**

S.No.	Districts	Visited
1.	Sujawal, Badin, Tharparker	13-26 Sept 2021

S.No.	Districts	Visited
2.	Umerkot, Sanghar, Mirpurkhas	22-25 Nov 2021 8-10 Dec 2021 19-25 Dec 2021

17. Visit debriefing for only Umerkot district was done on 6<sup>th</sup> Dec 2021 by ADB-TA Mr. Azeem and Mr. Maqsood Bhatti.
18. ADB-TA could not complete and submit its Final Due-Diligence Report(s) by 31<sup>st</sup> Dec 2021. ADB-TA will submit document to PIU for review by 31<sup>st</sup> Jan 2022.
19. Final Consolidated Safeguards Reports covering social, environmental and gender findings will be shared by ADB TA by 31 Jan 2022 and 15 Feb 2022 respectively.
20. Project Implementation Unit is processing final list of 160 schools based on incomplete information (DDR / screening checklist) acquired from ADB's TA Consultants.
21. PIU initiated a visit in Nov 2021 to develop ownership of the project and to cross-validate selected schools eligible for financing submitted earlier in Dec 2019 through Due-Diligence Report for Thatta district available at the time.
22. PIU-Environmental & Social Safeguard Specialist along with Chief Monitoring and Evaluation Specialist visited 12 schools in Thatta District in Nov 2021. Eight (08) out of Twelve (12) were proposed in the PC-1 document.
23. Grievance Redress Mechanism (GRM) document has been drafted by PIU-ESS in Oct 2021 and is based on SSEIP-Project Administration Manual (PAM).
24. Softcopy of GRM was circulated within the PIU team for review and comments. GRM Draft has been shared with PD Mr. Anees Dasti during his initial meetings with PIU Team.
25. Grievance Redress Mechanism and Committee for Project Output-01 is not notified as of 31<sup>st</sup> Dec 2021 because list of finalized schools for output-01 is not final.
26. An awareness training was conducted on 19<sup>th</sup> Nov 2021 with PIU consultants. Positive feedbacks were provided with idea for improvement. PD Mr. Hafeez asked to limit GRM to Output-01 only and exclude procurement & Financial matters as similar committees are already in place.
27. As per the procedures for Government of Sindh, a 'Note Sheet' will be put up to PD-SSEIP for a formal approval and use of Grievance Redress Mechanism (GRM) document at PIU in the first quarter of 2022.
28. As per the procedures for Government of Sindh, a 'Note Sheet' will be put up to PD-SSEIP for a formal notification of Grievance Redress Committee (GRC) in the first quarter of 2022.
29. As per the procedures for Government of Sindh, a 'Note Sheet' will also be put up to PD-SSEIP for a formal approval and notification of Grievance Redress Committee (GRC) at ten (10) Project District level in the first quarter of 2022.
30. No project related complaints were received at PIU-SSEIP during this reporting period.
31. SSEIP has contracted 'Design and Supervision Consulting (DSC)' Firm on 31<sup>st</sup> Dec 2021 after undergoing due procurement process specified by ADB. Engineering Consultants International (Pvt.) Ltd. has qualified as DSC firm for Output-1 at SSEIP.



32. Project Director, Mr. Anees Dasti intends to issue Notice to Proceed (NTP) to DSC in the first quarter of 2022.

33. Project Director also intends to share school list of 4 districts i.e. Thatta, Matiari, Tando Muhammad Khan and Tando Allahyar with DSC to initiate Design consultancy process formally.

### **2.3 Description of Any Changes to Project Design**

34. It was anticipated at the project beginning that ADB's TA will prepare IEE reports including EMPs for urban schools and only EMPs for rural schools.

35. This requirement stems from the local regulations i.e. Sindh Environmental Protection Act 2014's Review of EIA/IEE regulations 2015.

36. This regulation has been superseded in Oct 2021 with "Environmental Assessment Review rules 2021" and the same was communicated to TA.

37. According to new regulations, all schools will require preparation of IEE reports for submission at Sindh Environmental Protection Agency.

38. An online discussion meeting was held between PIU-ESS, ADB and ADB-TA to resolve this issue on 2<sup>nd</sup> Nov 2021.

39. There are no major changes in project design except change of requirements of IEE reports for all schools.

### **2.4 Description of Any Changes to Agreed Construction methods**

40. Civil works activities have not started under this project as of 31st Dec 2021.

## **3. ENVIRONMENTAL SAFEGUARD ACTIVITIES**

### **3.1 General Description of Environmental Safeguard Activities**

41. Sindh Secondary Education Improvement Project (SSEIP) envisaged since its beginning that the construction at the proposed 160 schools in the province of Sindh would require environmental assessments.

42. Initially it was planned that schools in urban areas will require preparation of an Initial Environmental Examination (IEE) with Environmental Management Plan (EMP) while schools in rural areas will require preparation of an Environmental Management Plan (EMP) only.

43. This requirement stems from "Review of Environmental Impact Assessment (EIA) / Initial Environmental Examination (IEE)" Rules 2015 under Sindh Environmental Protection Act 2014. The categorization of schools into urban and rural areas and therefore the exact number of types of report is left for decision by ADB's TA & PIU.

44. "Review of Environmental Impact Assessment (EIA) / Initial Environmental Examination (IEE)" Rules 2015 was superseded with "SEPA Environmental Assessment Regulations, 2021". New regulation specified that all schools will require preparation of an IEE report including EMP.

45. With the induction of ESS at PIU from Aug 2021; it was communicated to ADB and TA about the requirements of Sindh Environmental Protection Act 2014 and an online meeting was held on 02<sup>nd</sup> Nov 2021 to resolve this issue.

46. Requirements of SEPA were communicated and revised 2021 regulations were shared via email. PIU-ESS has also informed that the prevailing practice is to submit address specific IEE reports which translates to 160 IEE reports.
47. It was decided that PIU will submit TA's IEE reports (2 in numbers) for the project covering 10 districts to solicit approval from Sindh EPA. In case, Sindh EPA does not accept it, district specific (10 in number) IEE reports will be submitted.
48. It was decided that Local EPA requirements will be fulfilled by PIU with the help of ESS and DSC-ESS firm specialists.
49. Initial Environmental Examination Report is being prepared by TA Ms. Saira for 4 districts namely Thatta, Matiari, Tando Muhammad Khan, Tando Allah Yar. The Draft report has been shared with PIU for information on 02<sup>nd</sup> Nov 2021.
50. PIU-ESS has provided his feedbacks in various emails informing TA about the requirements of local environmental law and the changes that need to be done in the IEE report and selection of environmental monitoring laboratory.
51. IEE report for the remaining six (06) districts will be prepared and submitted to PIU by mid of February 2022.
52. After the DSC has proposed its design for schools, the same will be incorporated in IEE report(s) including EMP for submission at Sindh Environmental Protection Agency to accord its approval.
53. Approved IEE along with EMP will become part of Contractors' Bidding Document to demonstrate compliance with environmental and social safeguards at site locations.
54. Apart from the environmental mitigation measures specified in the IEE / EMP report and conditions levied by Sindh Environmental Protection Agency; a standard "EHS manual for construction activities" will be prepared and shared with contractors as a good practice document to follow and comply with HSE requirements.
55. As of 31st Dec 2021, no civil works contractor has been engaged. No Construction activities have started yet.

### **3.2 Site Audits**

56. No Site Audits for construction activities were conducted in the reporting period of Aug 2021 to Dec 2021.

### **3.3 Issues Tracking (Based on Non-Conformance Notices)**

57. No Non-conformance Notices were issued during the reporting period of Aug 2021 to Dec 2021.

### **3.4 Unanticipated Environmental Impacts or Risks**

58. Any unanticipated Environmental Impacts / risk, encountered during design or construction phase shall be documented in future reports.

## 4. RESULTS OF ENVIRONMENTAL MONITORING

### 4.1 Overview of Monitoring Conducted during Current Period

59. Not Applicable for the reporting period of Aug 2021 to Dec 2021. These shall be documented in future reports

### 4.2 Material Resources Utilization

#### 4.2.1 Current Period

60. Not Applicable for the reporting period of Aug 2021 to Dec 2021. These shall be documented in future reports

#### 4.2.2 Cumulative Resource Utilization

61. Not Applicable for the reporting period of Aug 2021 to Dec 2021. These shall be documented in future reports

### 4.3 Waste Management

62. Not Applicable for the reporting period of Aug 2021 to Dec 2021. These shall be documented in future reports

### 4.4 Health and Safety

#### 4.4.1 Community Health and Safety

63. Community Consultation were part of TA's scope of work under TA-9410. There is no information on any community consultation with PIU.

64. Not Applicable on PIU's part for the reporting period of Aug 2021 to Dec 2021. These shall be documented in future reports

#### 4.4.2 Worker Safety and Health

65. Not Applicable on PIU's part for the reporting period of Aug 2021 to Dec 2021. These shall be documented in future reports

### 4.5 Training

66. Details of training / discussion is enlisted as follows along with its date and number of participants:

**Table 3: Training Conducted by PIU**

S.No.	Training	Date	Participants
1.	Grievance Redress Mechanism	19 Nov 2021	19

67. Attendance sheet has been attached as **Annexure-I**.

68. There is a need to have training sessions on environment for PIU staff. Following trainings are proposed for the next quarter. A training needs assessment will be conducted internally every



quarter to identify participants and training topics.

- a. Awareness on importance of Environmental safeguard and climatic changes
- b. Applicable Environmental laws and requirements for SSEIP
- c. ADB's Requirements on Safeguards (Social, Environmental, SPS-2009 etc.
- d. Construction Health and Safety along with Activity Risk Assessment

## **5. FUNCTIONING of the SSEMP**

### **5.1 SSEMP Review**

69. Site Specific Environmental Management Plan in contrast to General Environmental Management Plan are prepared to mitigate any perceived and / or actual negative environmental impact of a project activity.

70. Site Specific Environmental Management Plan becomes a successor to a general Environmental Management Plan of an environmental assessment report, Initial Environmental Examination Report, in this case.

71. Site Specific Environmental Management Plan is applicable to the contractors undertaking construction related activities under this project. SSEMP will be prepared by the contractor and submit to PIU prior to start of any construction work.

72. Since the IEE is under work at ADB's TA, Site Specific Environmental Management Plan document is not available.

73. Further details on this subject will be available in future reports.

## **6. GOOD PRACTICE AND OPPORTUNITY FOR IMPROVEMENT**

### **6.1 Good Practice**

74. Presently project related activities are limited to office routine documentation work and PIU is making the best use of its time preparing for different project components.

75. PIU staff are positioning themselves for a successful implementation of the project right from the start. It is doing so e.g. by being part of technical negotiations with DSC firm and explaining the compliance requirements for environmental and social safeguards.

76. Similarly, internal discussions are held about the requirements and deliverables for the Teachers' Training Assessment Firm.

### **6.2 Opportunities for Improvement**

77. Presently much data is not available to comment on this section.

## **7. SUMMARY AND RECOMMENDATIONS**

### **7.1 Summary**

78. Project Implementation Unit of Sindh Secondary Education Improvement Project will continue to comply with safeguard requirements set forth in updated SSEIP - Project Administration Manual and subsequent related documents such as Environmental Assessment Review Framework,

Resettlement Framework etc.

79. PIU has been coordinating ADB's TA team in completing their field activities and anticipates to acquire Safeguard's report on social, environmental and gender safeguards by first quarter of 2022.

80. Awareness Training for PIU staff has been conducted on "Grievance Redress Mechanism – awareness". Similarly, more trainings will be conducted in future related to Environmental and Social Safeguards, HSE etc. at PIU level as well as district education office level and contractor's staff.


81. Cross-Validation visit has been conducted for 08 PC-1 proposed schools of Thatta districts. Feedback has been shared with TA who incorporated some of the findings in their report.

82. Design and Supervision Consulting Firm has been contracted as of 31st Dec 2021. School list will be shared with them on issue of NTP.

83. Design works of first batch of 40 finalizes schools as per priority districts will start in the first quarter of 2022 and will be followed by bidding of contractor(s).

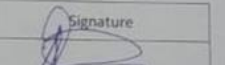
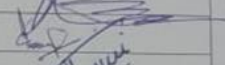
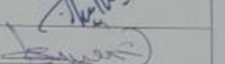
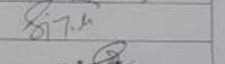
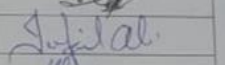


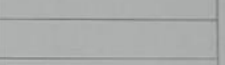
84. No environmental safeguard issues were faced during the reporting period as there was no physical work on site.

**Annexure-I : Training Attendance Sheet****Training Attendance Sheet – Grievance Redress Mechanism**


**GOVERNMENT OF SINDH**  
**SCHOOL EDUCATION & LITERACY DEPARTMENT**  
**SINDH SECONDARY EDUCATION IMPROVEMENT PROJECT**

**ATTENDANCE SHEET**

Training Topic: GRIEVANCE REDRESS MECHANISM - DRAFT (v1.0) Date: 19 - NOV - 2021

S.No.	Name	Organization	Designation	Signature
1.	Engr. Hafeez Raza Shaikh	SSEIP	Program Director	
2.	Engr. Muhammad Naveed	SSEIP	Project Manager	
3.	Fakiha Rasheed	SSEIP	CPS	
4.	Mohammad Ismail Zardari	SSEIP	CMES	
5.	Sanjay Kumar	SSEIP	CFMS	
6.	Liaquat Ali Solangi	SSEIP	Accounts Officer,	
8.	Engr. Tufail Ali Zubedi	SSEIP	ESS	
9.	Fayaz Ali Haseem	SSEIP	Admin Head	
10.				

Page | 1