



Stakeholder Engagement Plan

Solid Waste Emergency and Efficiency Project (SWEEP)

July 2020

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Executive Summary

The key objective of SWEEP is to address flooding due to overflow of sewerage and waste, and to improve the provision of solid waste management (SWM) services in Karachi. SWEEP is being designed as an emergency operation and will finance interventions that will be implemented over two phases: (a) in the immediate emergency response phase, activities will aim to mitigate high flooding risks linked to the 2020 monsoon and caused by accumulation of solid waste in the city's natural drainage channels (*nullahs*), and public health risks linked to COVID-19; and (b) in the medium-to-long-term phase, the Project will improve backbone SWM infrastructure and service delivery to address the underlying risk factors leading to recurring emergency flooding situations. The project has potentially high social and environmental risks associated with cleaning of waste from drains, transport to and construction of waste collection and storage facilities, and the role of the informal sector in waste collection, sorting and recycling.

For this project, the GOS oversaw a community outreach process in the design phase where, due to the COVID-19 outbreak, consultations were conducted in small groups with all participants following mandated SOPs. Key takeaways from the consultations were that communities are well aware of the benefits of, and desirous of having clean living and work environments and are even willing to make small payments to secure the same (these payments normally go into the informal economy). They do not have much faith in regular complaint mechanisms, and prefer to find solutions locally. The rudimentary waste sorting and recycling industry impedes effective garbage collection in neighborhoods, but contributes to livelihoods in the informal economy, and has enabled a recycling industry of sorts, which can be promoted and scaled up. In general, people in Karachi are highly aware of civic issues, and the COVID-19 crisis has added to their concerns that their immediate environment be safe and healthy.

The SEP requires an exercise of stakeholder identification. In addition to government implementing agencies and other concerned agencies, project affected parties include private contractors working with the SSWMB on solid waste collection and transport; waste pickers and recyclers in the informal economy; communities at landfill sites, labor engaged in sanitation services, elected representatives and the citizens of Karachi in general. The project will also affect some vulnerable groups, including women from marginalized communities; low income communities living in polluted environments; minorities who are often employed as sanitation workers at the lowest levels; and stateless citizens and refugees resident in the city many of whom are engaged in waste picking and sorting. The SEP outlines a plan for reaching out to all these groups using a variety of means of communication, and ensuring that their concerns are taken on board throughout the life of the project.

Stakeholder engagement will take place in three phases – in the project preparation phase (ongoing), while the project is being implemented, and lastly in the first few months after project activities have been wrapped up. In the first set of consultations, which took place in mid June 2020, the groups contacted included a community living near Gujjar Nullah, a 28 km. long storm water drain running through the city; a community living at Jam Chakro; communities living near the proposed site at Dhabeji; some selected interviews with waste vendors and recyclers, and consultations with community workers engaged in grassroots development work in Machar Colony, an informal settlement populated mainly by low income

households of Bengali origin, who are engaged in waste picking among other operations. Due to the ongoing COVID-19 crisis, focus groups were restricted in size, and not more than 10 persons participated where group discussions were held (in UC Dhabeji, Jam Chakro and in the Gujjar Nullah community).

In the preparation stage, the purpose of engagement was to apprise the stakeholder groups of planned activities, and to ensure that valid concerns of stakeholders and useful suggestions are taken on board before program activities are finalized. In the project implementation stage, the emphasis will be on disseminating information on how activities are proceeding, and getting feedback on impacts. Engagement after program conclusion will focus on understanding whether the project has achieved its objectives. The project proponents will appoint a Social Development Specialist (SDS) in the PIU, who will lead the consultations with vulnerable groups. The Specialist will formulate a strategy for engagement at project commencement, the outlines of which have been given in the SEP and include mapping of groups, and a program of consultation using community based organizations and direct contacts.

A Grievance Redress Committee (GRC) will be constituted at the PIU, managed by the Social Development Specialist (SDS). An online complaint registration system will be set up for the project, which will also link with the SSWMB's Citizen's Portal. grievances/complaints will be screened and classified into three categories by order of priority, with those requiring instant action being classified as high priority. Grievances will be investigated and resolved within the timeframe specified, which will not be longer than ten days. Records of all grievances/complaints will be maintained in a database, including details of actions taken to resolve the issue, and dates on which resolution was effected. At the conclusion of action to solve grievances, the complainants will be informed of the outcome. Two days after action is closed and complainants informed, they will be contacted again to ensure that they are satisfied with the work done. The system will include a system for Appeals. If a complainant remains unsatisfied, he/she will be able to lodge an appeal, which will be escalated to the head of the GRC. The PIU will also include a Monitoring Unit which will devise a complete project monitoring plan and schedule in accordance with project implementation activities.

This is a preliminary SEP and will be updated and disclosed within 60 days of project effectiveness. Thereafter, the SEP will be periodically revised and updated as necessary in the course of project implementation.

1. Introduction/Project Description

The Government of Sindh (GOS) has requested the World Bank to provide immediate emergency support to mitigate the impacts of the impending flooding linked to the upcoming 2020 monsoon. The Government has also requested medium-term support to develop essential backbone infrastructure to improve collection, transfer, and disposal of solid waste in line with international standards. The backbone infrastructure will ensure that recurring risks and vulnerabilities linked to leakages in the solid waste management (SWM) system and unsafe disposal of waste are minimized in a sustainable fashion. All of these activities are to take place taking into account the widespread COVID-19 infection, and associated risks.

In view of the widespread flooding and public health crisis that resulted from the 2019 monsoon, the subsequent deterioration of SWM services since early 2020, and further shocks during the ongoing COVID-19 crisis, the Bank approved the use of emergency procedures to prepare and implement an emergency support operation. The proposed project will be known as the Solid Waste Emergency and Efficiency Project (SWEEP).

The key objective of the project is to address flooding due to overflow of sewerage and waste, and to improve the provision of SWM services in Karachi. The project is at Appraisal stage as of end-June 2020.

1.1. Project Description

SWEEP is being designed as an emergency operation and will finance interventions that will be implemented over two phases: (a) in the immediate emergency response phase, activities will aim to mitigate high flooding risks linked to the 2020 monsoon and caused by accumulation of solid waste in the city's natural drainage channels (*nullahs*), and public health risks linked to COVID-19; and (b) in the medium-to-long-term phase, the Project will improve backbone SWM infrastructure and service delivery to address the underlying risk factors leading to recurring emergency flooding situations.

Component 1: Immediate Emergency Response Interventions

Interventions under this component will aim at mitigating high risks from flooding during the 2020 monsoon. Key interventions include cleaning of *nullahs*, safe disposal of waste cleared from *nullahs*, and communication and outreach activities.

Component 2: Development of SWM Backbone Infrastructure

This component will finance backbone infrastructure for the SWM sector, essential to the restoration of primary SWM functions in Karachi, from collection to disposal. The modernization of the SWM system will be achieved through a series of incremental improvements consisting of specific technologies and policies toward waste minimization, waste diversion, and value recovery, progressively bringing innovation to the SWM sector in Karachi. Key investments include the construction of new sanitary disposal cell at Jam Chakro dump site, construction/ upgrading of transfer stations, retrofitting of existing and construction of new *kachra kundis*, development of advanced waste treatment solutions, and provision of equipment and machinery to local councils and the Sindh Solid Waste Management Board (SSWMB).

Component 3: Project Management and Implementation Support

This component will support implementing agencies, primarily the Project Implementation Unit (PIU) under the SSWMB, to manage and implement activities and investments under SWEEP.

SWEEP will cover all six urban districts, and the rural district of Karachi.

1.2. Potential Social and Environmental Risks

The project will be prepared under the World Bank's Environment and Social Framework (ESF) and is expected to have 'High' environmental and social risks. This is mainly due to potential serious occupational and community health and safety and environmental risks and impacts associated with, inter alia, cleaning of waste from *nullahs*, transport and temporary storage of potentially contaminated waste materials, and development of landfill cells and transfer stations. Major social risks are also due to encroachment issues (primarily along *nullahs* and on the Jam Chakro site); possible resettlement at project sites; significant role of the informal sector in waste-picking and recycling and the control of powerful groups; widespread involvement of migrants (including Afghans), children and minors in waste recovery at primary, secondary and tertiary waste disposal sites; exploitation of informal sector workers by middlemen and contractors managing dumpsites; and general issues related to vulnerability and exclusion.

Decisions on which public input is sought

Public input will be sought on location of and specifications of the temporary storage facilities at Jam Chakro, as well as on the location and specifications of the new sanitary landfill cell to be constructed at the same site. The community at Jam Chakro will particularly be consulted, along with urban/ SWM experts from the city who have written and researched on the sector.

Experts will also be consulted on the locations of additional transfer stations to be constructed, and once these locations are decided upon, the communities living in the surrounding localities, and along the relevant transportation routes, will be consulted on the management and maintenance of the stations, operational schedules, etc. The same is true for *kachra kundis*.

The development of modern landfilling capacity at Dhabeji (a greenfield location) will require a long-term plan of community involvement including discussions on design of the proposed site, and facilities to be provided there, both for waste disposal and for SWM workers.

This stakeholder engagement plan (SEP) is based on a reading of secondary data and literature, consultations with experts in the field of urban development, particularly in Karachi; consultations with government institutions, and on focus group discussions (FGDs) and key informant interviews conducted in communities and with waste vendors. Due to the exigencies of COVID-19, the number of FGDs had to be limited, and had to be held outdoors in public places, which was not conducive to women's participation. This was particularly true of consultations in low income areas in dense neighborhoods. Consultations held with communities outside the main city included women, as they were more comfortable meeting out of doors. Similarly, the field team could not visit some particularly densely populated areas, such as the informal settlement of Machar Colony, due to fears of crowding during consultations. For this location, they resorted to interviews with community practitioners

working in the area. Given these constraints, the current document can be considered a preliminary SEP, which will be updated and disclosed within 60 days of project effectiveness. In general, the SEP is a living document and can be updated as the project proceeds, depending on requirements.

2. Brief Summary of Previous Stakeholder Engagement Activities

The SSWMB has in the past engaged with the Sindh Environmental Protection Agency (SEPA) on environmental management issues. The Board participated in consultations on, among other things, pollution on Karachi's beaches.¹ Both the Board and the KMC also participated in public consultations organized for Environmental Impact Assessments (EIAs) of different projects by the SEPA.

2.1. Summary of Consultations in SWEEP Project Preparation Phase

For this project, the GOS oversaw a community outreach process in the design phase, prior to project appraisal. Due to the COVID-19 outbreak, consultations were conducted in small groups and in limited locations in low-income settlements, with all participants following government mandated SOPs. A team of community workers held consultations in Jam Chakro and select low-income settlements in Karachi. Most of the respondents in the main city were men, as they had access to open spaces where consultations were conducted. Consultations with women would normally have been conducted in houses or enclosed public spaces (like a schoolroom), but this was not recommended or possible with COVID-19 restrictions in place. Females did participate in consultations in villages or settlements outside the main city where they were more comfortable sitting in an open public space.

Communities in low-income settlements: Communities were asked about SWM and were generally critical of the performance of municipal service agencies, and keen to see improvements in service. The COVID-19 pandemic has increased fears concerning health, and communities are becoming more vocal about the need for a clean environment and maintenance of public spaces.

Among the community groups contacted, it was acknowledged that people living in streets bordering the *nullah* tend to throw their garbage into the *nullah*. However, people claimed that in other areas, garbage collection was being carried out (as explained below). They also stated that areas tend to get flooded during the monsoon or heavy rains, as the entire length of *nullahs* is not cleaned properly.

Communities also explained the informal arrangements that are currently in place in some areas for door to door collection of waste. This operation is normally carried out by members of the Afghan community, with each household paying a nominal amount for the service. The communities were not clear where the waste collectors deposit the garbage or what they do with it.

The communities appeared to have little confidence in the complaint systems of the DMC or KMC – in fact they said that they rarely called these organizations to complain about solid waste accumulation in their area. Instead, they prefer to rely on the informal waste collection systems in place. Their impression is that the city authorities are slow to respond and will not show up to in response to complaints from locals.

Communities of Waste Pickers and Vendors: Limited consultations were also held with waste pickers and vendors in two union councils of Karachi. Vendors confirmed that garbage is

¹ See an account of the meeting at: <https://www.dawn.com/news/1367977>.

collected door to door using various means of transport (depending on the area), from wheelbarrows and donkey carts to small vans (Suzuki pickups). Each household is informally charged for this service, with charges typically ranging from Rs. 300 per month to as high as Rs. 500. The waste pickers then sort the waste stream into recyclable and non-recyclable materials, with the former being sold to vendors, with rates being set per kg for type of waste. In addition to door to door collection, waste picking also takes place at roadsides, with areas being divided across groups of waste pickers. Materials generally considered recyclable include plastic, bottles, cardboard, paper and metal. Waste pickers are estimated to earn Rs. 500 to Rs. 700 per day on an average day. Vendors claim that as waste pickers who pick up waste from homes do their sorting, they throw non-recyclable materials into *kachra kundis*. Roadside waste is however left at site after sorting. Some households do their own sorting and are in touch with *kabaris* who go house to house and pick up recyclable material.

Table 2.1: Number of Participants in Focus Groups for SWEEP Consultations – June 2020

<i>Location</i>	<i>Males</i>	<i>Females</i>
Bhatta Town, North Nazimabad (near Gujjar Nullah)	6	-
Waste vendors in DMC East	3	No female waste vendors in city
Jam Chakro	5	5
UC Dhabej	7	10
Community workers interviewed for Machar Colony	1	1

The above consultations show that communities are largely dissatisfied with waste management services, and have in many cases, resorted to finding solutions in the informal sector, for example through the network of waste pickers and recycling agents. Restoring trust in public waste management services is crucial, and this can only be done by a significant improvement in service quality, which is partly to be achieved through this project. It is also important to ensure that the views of citizens in general, and vulnerable communities in particular, be reflected in project design. The project preparation phase consultations have served to highlight some important issues as follows. These ideas are being incorporated into project design and will be given a more concrete form during implementation:

- Communities are willing to pay to have solid waste picked up door to door, whether it is by waste pickers, or sanitation workers already employed by the municipality. Communities living on the banks of the nullahs deposit waste in the nullah since they perceive it as a de facto waste dumpsite, and not as a part of the drainage system. This is largely due to the sorry state of the nullahs as they stand at present. This state of affairs can be turned to the advantage of the city by educating communities about safe disposal and deploying enough manpower to patrol the city.
- Women are as aware as men of the need to keep residential areas, commercial spaces and public spaces clean, and are particularly concerned for the health of their children who utilize these spaces. They are also the ones who typically deal with waste collectors and municipal sanitation staff, and can rate services well. The project will continue to elicit their feedback through different phases of implementation.

- Improving the work conditions of sanitation staff can yield dividends in terms of work performance and efficiency. Acknowledging this connection, as the government indeed is doing, will help workers as well as citizens. The Board is working to institute operational health and safety standards for all workers, in addition to adherence to minimum wage statutes, with the expectation that these initiatives will lead to a significant improvement in performance of the staff.
- Low income communities are less likely to resort to government complaint registering mechanisms and prefer to approach the problem through local representatives and community leaders. While this may be effective, the strengthening of grievance redress systems through the project will be aimed at gaining the trust of the citizens in general.
- Communities are somewhat familiar with the concept of rudimentary recycling, and are well acquainted with the kabari system. Some of them carry out recycling themselves by saving waste materials and selling to kabaris. Creating space for sorting and sifting at waste dumpsites will further encourage the recycling ethic which already exists to some extent. In essence, bringing the waste sorting and recycling operations into the mainstream and integrating them into the larger SWM systems in the city will serve to prevent pollution along roadsides and near garbage dumpsites in the city.
- Most citizens of Karachi have some years of education, and are highly aware of civic and health issues. For instance, communities living near nullahs are themselves aware that nullah cleaning cannot be done at key points, but has to be carried out all along the length of the nullah system. Once again, this presents an opportunity to ask for their cooperation in improving the environment of the city – they are sure to respond positively if they believe that the service provided will be effective and efficient. The government is also keen to engage these communities and work to effect behavioral change over a longer period.
- COVID-19 has provided an opportunity in terms of higher health related awareness in communities. During consultations, people were vocal about the need for a safe, clean environment even after the crisis is over. This sentiment can and will be respected, and will form the basis for securing community cooperation in the different works to be carried out under SWEEP.

3. Stakeholder Identification and Analysis

Stakeholders include both those who are clearly and unquestionably affected by the project and those who do not experience direct impacts, but who have an interest in how the project proceeds. The key stakeholders are listed as follows.

Government Agencies Directly Concerned with the Project

Government agencies who have stakes in the project are listed as follows. The project proponents (the SSWMB and the KMC) will have to coordinate efforts across this group for successful implementation.

Sindh Solid Waste Management Board (SSWMB): The SSWMB was formed in 2014 under an Act of the provincial assembly. The Board is empowered to manage solid waste issues for the province of Sindh as a whole, and has the right to recommend a cess, tariff or other charge to the government for the management of solid waste; to construct and manage sites and buildings for solid waste management and disposal; and to make rules and regulations for the same etc. The Board is also empowered to manage a Fund, known as the Sindh Solid Waste Management Fund, in which charges, rates and fees may be deposited; in addition to other grants and loans made to the Board. The Board is headed by the Chief Minister or his nominee, and also includes a Managing Director, four Chief Executives and eleven ex-officio members from different departments of the GOS.

The SSWMB will be the primary implementing agency for SWEEP, with a Project Implementing Unit (PIU) for administration of the project and to manage project procurement, environmental and social management, and works. The SSWMB will be responsible for work on Component 2 of SWEEP, which consists of development of SWM infrastructure; and for the temporary storage capacity developed for waste cleared from storm water drains under Component 1.

Karachi Metropolitan Corporation (KMC): KMC was initially formed as the Karachi Municipal Corporation in 1933, and has been responsible for a number of municipal functions for the city, including SWM in the past. KMC is responsible for cleaning and maintenance of around 38 major *nullahs* in Karachi, maintenance of 28 key thoroughfares in the city, as well as bridges, streetlights, abattoirs, beaches, and certain recreational facilities. Under SWEEP, KMC will be responsible for cleaning of *nullahs* under Component 1.

Local Government (LG) Department, GOS: The LG Department is responsible for coordinating the work of all local governments in the province, including the KMC and the six district municipal corporations (DMCs) in Karachi. The Department oversees efforts by local governments to deliver services within their areas of jurisdiction, including SWM collection services provided by DMCs. The Secretary Local Government is an ex-officio member of the SSWMB. At present, the Department is implementing key components of the Bank funded Competitive and Livable City of Karachi (CLICK) project, including technical support for policy and regulatory development in the SWM sector (component 4 of CLICK). The Department also hosts the Project Implementation Unit (PIU) for CLICK, which has been nominated to support the implementation of emergency activities under SWEEP.

District Municipal Corporations (DMCs): There are six DMCs in Karachi which carry out a variety of functions including maintenance of secondary and tertiary roads; management of

public spaces like parks and playgrounds; and construction and maintenance of secondary and tertiary drains. Currently DMCs are also providing front end collection services (moving waste from bins and *kachra kundis* to designated transfer stations) for solid waste in three districts – West, Korangi and Central.

Other Government Departments

Land Owning Entities: Karachi’s administrative structure is highly fragmented and consists of several land-owning agencies in addition to the provincial government. These include entities such as the Karachi Port Trust (KPT), Cantonment Boards, the Defense Housing Authority (DHA), the Karachi Fisheries Harbor Authority (KFHA) and SITE industrial estate, to name just a few. While some of these entities use city municipal services, others have contracted out SWM in areas under their jurisdiction to private contractors. It is important to recognize and map city areas by jurisdiction and mode of service delivery in SWM to get a complete picture of how the sector is managed in the city.

Sindh Environmental Protection Agency (SEPA): The SEPA, or Environment, Climate Change and Coastal Development Department as it is also known, is concerned with improving environmental conditions in Sindh, including reducing air and water pollution. As per the Sindh Environmental Protection Act 2014, Section 14, disposal of solid waste at unauthorized places is prohibited, as is dumping of waste in coastal waters. According to Section 17 of the Act, all project proponents in the province have to file an Initial Environmental Examination (IEE) or an Environmental Impact Assessment (EIA) with the Agency depending on the extent of anticipated environmental impacts – projects requiring construction work normally require an EIA.

Planning and Development Department (P&DD), GOS: The P&DD prepares the development budget for the province, allocating funds for different development schemes. It is also the prime agency dealing with international aid agencies, making decisions, in consultation with the Finance Department and other government agencies, on areas where development resources are required. In its capacity as an arbiter of development activity in the province, the P&DD will have an interest in the project.

Finance Department (FD), GOS: As the key institution releasing funds for project implementation, the FD is also an important stakeholder in any development program.

Industries and Commerce Department, GOS: The Department is responsible for industrial policy in the province and for managing industrial estates. Its interest in the project stems from the proposed development of the Dhabeji Special Economic Zone (SEZ), an estate to be developed as a component of the China Pakistan Economic Cooperation (CPEC) project in Dhabeji. As of June 2020, land has been acquired for the project, and construction is expected to begin in the last quarter of 2020. But the Department will be consulted about the management of a proposed new disposal site close to the SEZ.

3.1. Project Affected Parties

Parties affected by this project have been identified as follows.

Private Sector and Informal Operators

Solid Waste Management Companies: The SSWMB awarded contracts, in 2017 and 2018, to two private companies to carry out waste collection and transfer to landfill sites in four districts, East, South, Malir and West. The Board subsequently canceled the contract for District West in August 2019 due to poor performance. The contractors are still operating in districts South, East and Malir. Private companies are also involved in the management of the two dumpsites where Karachi's solid waste is eventually deposited, i.e. Gond Pass and Jam Chakro. These are service contracts primarily for machinery, including loaders and dozers. Both sites also have weigh bridges to assess the quantity of garbage being deposited daily.

Waste Pickers and Contractors Engaged in Recycling: In 2001, it was estimated that about 100,000 persons in Karachi were dependent on the informal waste picking and recycling industry in Karachi, consisting of about 1000 units.² This number is likely to have doubled since then, given the in-migration in Karachi, and population increase in general. Waste pickers (who include children, often from the Afghan community) typically separate waste on the city streets, in *kachra kundis*, or at garbage collection points, picking out bone, metal, paper and glass to sell to *kabaris*. The *kabaris* in turn sell the waste to waste processing operations in the informal sector, who carry out rudimentary recycling. Waste generation in Karachi in fact feeds recycling operations as far afield as central Punjab and north Lahore – a sizable market for cardboard waste, for example, is based in Lahore. For this informal recycling industry, waste is a raw material which can be traded and processed, and ultimately generates profit. At the same time, their activity is detrimental to the environment in the city as they are suspected to collude with municipal staff to prevent waste collection, and to divert trucks from landfill sites to locations nearer to the city where they carry out scavenging activity.

General

Elected Representatives: Almost all major political parties are represented in the city through all three tiers of the legislature – the National and Provincial Assemblies and local governments. The political leadership across the board is keen to see improvements in basic services in the city, but may have different strategies on how to bring about these reforms. This project will require the involvement of the provincial and well as local government leaders.

Labor: The city depends on the services of more than 11,000 sanitary workers and their supervisory staff, in addition to laborers working with private contractors to operate machinery, work as drivers and loaders etc. The solid waste sector is highly labor intensive, and depends on the effort, productivity and commitment of a labor force with a variety of skills. They will have to be taken on board at every stage of project implementation. Labor working in the solid waste sector may be employed on long term contracts with benefits etc., or may be operating on entirely informal arrangements. Both categories will be identified in the course of project implementation and consultations will incorporate the concerns of both.

Citizens: All citizens of Karachi are affected by the state of SWM services in the city to varying degrees. Those living along choked *nullahs*, and in the vicinity of garbage transfer stations and

² Ali, Mansoor and Arif Hasan. (2001). 'Integrating Recycling and Disposal System for Solid Waste Management in Karachi.' Urban Resource Center. Unpublished.

kachra kundis may be particularly vulnerable to the negative health and environmental impacts generated from garbage piling up. But in general, all residents of the city, including those living in high income residential areas, have suffered due to the atmospheric, environmental and visual pollution created from uncollected solid waste.

Community at Jam Chakro: The landfill site of Jam Chakro is characterized by the presence of a community of around 410 households,³ who have been living at the site since it was developed as the main garbage dumping site for Karachi. The community are said to have migrated from another dumpsite in New Karachi more than two decades ago – essentially moving from one major dumpsite to the next. Most households have at least one, if not more, members involved in sorting through garbage. One of the most commonly witnessed activities in Jam Chakro is burning garbage to sift out metal waste, which is then sold to local *kabaris* who are in regular contact with the community. The living conditions at Jam Chakro are abysmal. The community’s only access to water is through a tanker which supplies water but charges high enough rates that most households can barely afford to buy enough water to cook – washing or cleaning are simply not possible. There is one school at the site, which is run by an NGO, Idara Al-Khair, and has an enrolment of about 300 students. The community represents the poorest of the poor in Karachi’s socioeconomic fabric.

A summary of the interests of project affected parties is given in Table 3.1.

Table 3.1: Project Affected Parties

<i>Project Component</i>	<i>Stakeholder Group</i>	<i>Positive Impacts</i>	<i>Negative Impacts</i>
Cleaning of waste from <i>nullahs</i> obstructing the flow of water	Karachi Metropolitan Corporation (KMC), District Municipal Corporation (DMC), Sindh Solid Waste Management Board (SSWMB), Communities living next to <i>Nullahs</i> , Community living in Jam Chakro.	High positive impact on citizens in general, and communities living in vicinity of <i>nullahs</i> as well as implementing agencies who will win plaudits	Potential loss to owners of some structures extending onto <i>nullahs</i> (which may be inadvertently damaged in the cleaning activity). Possible negative impacts of temporary storage facility on nearby communities due to noxious fumes
Construction of temporary storage and dewatering facility for waste cleared from <i>nullahs</i> before its final disposal in the new sanitary disposal cell to be constructed at Jam Chakro			
Communication and outreach activities aimed at communities living around the <i>nullahs</i> to encourage residents to limit dumping of household waste into <i>nullahs</i> .	Karachi Metropolitan Corporation (KMC), District Municipal Corporation (DMC), Sindh Solid Waste Management Board (SSWMB), Communities living next to <i>Nullahs</i> .	Generally positive impacts	

³ As per a survey recently conducted by NESPAK.

<i>Project Component</i>	<i>Stakeholder Group</i>	<i>Positive Impacts</i>	<i>Negative Impacts</i>
Construction of new sanitary disposal cell at Jam Chakro	Karachi Metropolitan Corporation (KMC), Sindh Solid Waste Management Board (SSWMB), Communities living in Jam Chakro. Waste pickers and recycling enterprises whether in the formal or informal sectors.	Positive impact on city residents in general	Possible negative impacts on community at Jam Chakro due to possible pollution from transport to cell and noxious fumes. Negative impacts associated with potential resettlement impacts for the community of waste-pickers settled at Jam Chakro
Construction/ Upgrading of Transfer Stations in the City.	Karachi Metropolitan Corporation (KMC), District Municipal Corporation (DMC), Sindh Solid Waste Management Board (SSWMB), Communities where these new sites will be constructed. Waste pickers and recyclers. Private contractors responsible for waste collection and transportation.	Positive impact on city residents in general.	Negative impact on waste pickers and recyclers whose access to sites may be restricted. Negative impacts on communities living near sites in initial stages
Retrofitting of Existing and Construction of New <i>Kachra kundis</i> at appropriate locations.	Karachi Metropolitan Corporation (KMC), District Municipal Corporation (DMC), Sindh Solid Waste Management Board (SSWMB), Communities where these new <i>Kachra kundis</i> would be constructed, and also where these will be upgraded. Waste pickers and recycling enterprises. Private contractors.	Positive impact on city residents in general.	Negative impact on communities living too close to <i>kachra kundis</i> . Negative impact on waste pickers and recyclers whose access to sites may be restricted.
Development of Advanced Waste Treatment Solutions, including modern landfilling capacity at Dhabeji, and treatment of non-municipal waste streams	Karachi Metropolitan Corporation (KMC), Sindh Solid Waste Management Board (SSWMB), Communities Community living in Jam Chakro, Communities living around Dhabeji. Communities living around locations of treatment facilities for non-municipal waste. Private contractors.	Positive impact on city residents in general. Positive impact on communities in Dhabeji who may have	Potential negative impact on community in Jam Chakro which depend on waste sorting as a livelihood.

<i>Project Component</i>	<i>Stakeholder Group</i>	<i>Positive Impacts</i>	<i>Negative Impacts</i>
		access to more employment opportunities	
Provision of Equipment and Machinery to Local Councils and SSWMB	Karachi Metropolitan Corporation (KMC), District Municipal Corporation (DMC), Sindh Solid Waste Management Board (SSWMB).	Positive Impact in general	
Project Management and Implementation Support	Local Government Department, Sindh Solid Waste Management Board (SSWMB). Karachi Metropolitan Corporation (KMC)		

3.2. Other Interested Parties

Civil Society: Karachi has a vibrant NGO sector, including a number of organizations which are particularly concerned with urban development issues. Prominent among these are the Urban Resource Center (URC), the Orangi Pilot Project (OPP), Shehri among others. Many of these organizations have a rich repository of work on Karachi and have in the past engaged with the government to provide expert advice. Consultations with them will be an important element in the project going forward. Furthermore, their services, or the services of experts, may be requested to identify clusters within vulnerable communities where project consultations would be most fruitful. In fact, the project proponents may request NGO partners to take forward consultation exercises, particularly in cases where NGOs have a long history of working with the concerned community.

Media: Pakistan has a vibrant media, with a host of newspapers in Urdu and English, as well as regional languages; almost a hundred privately owned TV channels; and FM radio services with a significant audience. Social media is also flourishing with the proliferation of smartphones. The media has done much to highlight social issues, including the state of urban services, particularly in Karachi. All forms of electronic and print media, as well as social media, particularly apps that are popular with young people, will be utilized in a communication campaign to build support for the project, and help realize project objectives over the medium and long term.

Law Enforcement Agencies: Karachi is plagued by the presence of criminal groups who appropriate state land and establish their own private concerns on them. The SSWMB has faced this problem with regard to the land identified for some garbage transfer stations, and in some parts of Jam Chakro where attempts have been made to establish a housing colony. The project will call upon law enforcement agencies to fulfill their responsibilities and ensure that state land is protected from illegal occupation.

Table 3.2 summarizes the discussion.

Table 3.2: Other Interested Parties

<i>Other Interested Parties</i>	<i>Interest in the Project</i>
Civil Society	Identifying the concerns of stakeholders and helping government find a solution, as well as reaching out to communities if needed by implementing agencies.

<i>Other Interested Parties</i>	<i>Interest in the Project</i>
Media	Have in the past worked to highlight urban issues, and can be used to publicize innovative solutions.
Law enforcement agencies	Working with the government to prevent encroachment by criminal elements.

3.3. Disadvantaged / Vulnerable Groups

Three vulnerable groups have been identified for this project, and the stakeholder engagement exercise will be designed to ensure that they are consulted with on a regular basis, and included in key decision making processes. For all vulnerable groups, stakeholder engagement will be designed such that discussions take place within their residential neighborhoods or at their places of work, so that their access to the venue is assured. An effort will be made to either arrange discussions through NGOs or community based organizations who closely work with them, understand their issues, and also employ staff who speak the language most often used in the community, and can advise on the most suitable times of the day for consultations. The vulnerable groups identified include the following.

Women from Marginalized Groups: Women working in the informal sector and in low paid occupations are particularly vulnerable to exploitation, both financial and sexual/social. Women are more liable to be hired on a temporary basis, or on short-term contracts, at wages that fall below the minimum wage threshold, and with little or no benefits. Women also bear the brunt of negative health impacts in polluted residential areas, given that they are more likely to spend more time at home or in their neighborhoods. Their access to essential services, including health and education, is also more likely to be negatively impacted if living in an area with poor infrastructure and transport links.

Women’s tough circumstances have been rendered worse by the ongoing COVID-19 pandemic, which has resulted in high losses in small and medium enterprises, which tend to hire women workers, or provide more work from home opportunities. A recent World Bank analysis shows that women-owned enterprises, which are typically operating on a small scale compared to the average, were 8 percent more likely to lose their entire revenue during the current pandemic.⁴ Women are also disproportionately affected when community health workers are not active in the field, or when they cannot go door to door to supply essential medication, hygiene products, and contraceptives etc. Reports of increases in gender-based violence during the crisis are also a cause for concern.

Households/Communities at or Below the Poverty Line: Communities living along congested *nullahs*, those resident at or near dumpsites like Jam Chakro, communities of waste pickers and garbage sorters, and even those who work in the solid waste and sanitation sector at the grassroots level are typically surviving on subsistence livelihoods with little or no access to good quality social infrastructure or education and health facilities. Their interaction with the state is limited, and is often defined by adversarial factors, particularly in big cities like Karachi.

⁴ See Quresh, Uzma. (2020). ‘Women and girls must be at the center of Pakistan’s COVID-19 recovery.’ World Bank blogs.

Poor experiences with municipal authorities are often amongst the only notable contact they may have had with a government agency in some time. Gaining the trust of these communities and assuring them that the government is indeed responsive to their needs, and would find their contribution useful, is crucial for the project.

Minorities: A significant proportion of Pakistan’s sanitation workers are Christian or Hindu, and suffer multiple forms of discrimination on account of their poor socioeconomic status, and as a religious minority. As with other vulnerable groups, they have been particularly negatively impacted by COVID-19 as they rarely have access to protective clothing and equipment, and their work exposes them to the general public on a daily basis.

Stateless Citizens and Refugees: According to UNHCR estimates, Karachi is home to about 700,000 stateless persons,⁵ including ethnic Biharis, Bengalis and Rohingya, who live primarily in the Machar Colony area. Like other residents of squatter settlements with little or no access to solid waste and sanitation services, these groups are also particularly vulnerable to disease. Karachi also has a significant population of Afghan refugees – according to a 2005 survey conducted by the Ministry of States and Frontier Regions (SAFRON), there were more than 130,000 Afghans in Karachi city.⁶ Many of the Afghans, including children, are engaged in waste picking, and work as scavengers across the city. Afghans resident in Pakistan, who are not here on work or study visas, are supposed to carry either Proof of Registration (POR) cards, confirming their status as refugees, or Afghan Citizen Cards (ACC) indicating their migrant status. Since their conditions of residence in Pakistan do not allow them to legally own property or businesses, or join public service, they tend to work largely in the informal sector.

Table 3.3 summarizes the interests of vulnerable groups.

Table 3.3: Interests of Vulnerable Groups

<i>Activities</i>	<i>Vulnerable Groups and Individuals</i>	<i>Characteristics/ Needs</i>	<i>Preferred means of notification/consultation</i>	<i>Additional Resources Required</i>
Cleaning of waste from <i>nullahs</i> obstructing the flow of water Construction of temporary storage and dewatering facility for waste cleared from <i>nullahs</i> at Jam Chakro, before its final disposal in the new sanitary disposal cell to be constructed at Jam Chakro	Communities at or near the poverty line living near <i>nullahs</i> . Around 400 households living at Jam Chakro	Poor communities living in makeshift housing. Safety to be ensured during operations	FGDs to be carried out with communities. In COVID days, a communication campaign relying primarily on social media and radio and TV spots.	Supervised by Social Development Specialist at PIU with assistance from civil society partners
Construction of new sanitary disposal cell at Jam Chakro Dumpsite	Around 400 households living on Jam Chakro Dumpsite	Poor communities living in makeshift housing. Safety	FGDs to be carried out with communities. In COVID days, to be supplemented with a communication	Public Health Official should also be part of this exercise to identify the

⁵ UNHCR Pakistan. (2019). Pakistan Protection Trends – July to September.

⁶ SAFRON/UNHCR. (2005). Census of Afghans in Pakistan.

<i>Activities</i>	<i>Vulnerable Groups and Individuals</i>	<i>Characteristics/ Needs</i>	<i>Preferred means of notification/consultation</i>	<i>Additional Resources Required</i>
		to be ensured during operations Potential livelihood and or displacement impacts to be address	campaign relying primarily on social media and radio and TV spots.	health needs of this community Supervised by Resettlement Specialist in the PIU, with the assistance of civil society organization as required
Construction/ Upgrading of Transfer Stations in the City.	Households/communities near the sites marked for construction. Waste pickers	Poor communities and waste pickers. Safety to be ensured.	FGDs/corner meetings to be carried out with communities. In COVID days, awareness campaign through social media, radio and TV spots.	Supervised by Social Development Specialist at PIU with assistance from civil society partners
Retrofitting of Existing and Construction of New <i>Kachra kundis</i> at appropriate locations.	Households/communities near <i>kachra kundis</i> . Waste pickers	Poor communities and waste pickers. Safety to be ensured. Avoid impacts on existing livelihoods	FGDs/corner meetings to be carried out with communities. In COVID days, awareness campaign through social media, radio and TV spots.	Supervised by Social Development Specialist at PIU with assistance from civil society partners
Development of Advanced Waste Treatment Solutions, including modern landfilling capacity at Dhabeji, and treatment of non-municipal waste streams	Household at Jam Chakro depend on the waste for their livelihood, and of the site is shifted they would lose their livelihood.	Communities at or near the poverty line. Avoid disturbance of existing livelihoods	FGDs to be carried out with communities led by the Government.	Some form of resettlement plan in place for community at Jam Chakro

3.4. Summary of Project Stakeholder Needs

The following table summarizes project stakeholder needs.

Table 3.4: Project Stakeholder Needs

<i>Stakeholder group</i>	<i>Key characteristics</i>	<i>Language needs</i>	<i>Preferred notification means (e-mail, phone, radio, letter)</i>	<i>Specific needs (accessibility, large print, childcare, daytime meetings)</i>
Low income Communities	Low income, below or close to poverty line.	Sindhi, Balochi, Bengali, Pashto in addition to Urdu	Radio, TV, social media and text messages as well as robo calls on service quality	Available at specific times of day, probably in evening. Access to their residential areas may be difficult rains
Middle income communities	Range of livelihoods	As above, but probably comfortable with Urdu also	Phone, TV, social media, community leaders may be available on email	Available at specific times of day, probably in evening
Expert groups	Often employed in the formal sector	English or Urdu	Email and phone	Meetings during working hours preferably
Women from marginalized communities	May not have much freedom of association or movement	Balochi, Sindhi, Pashto, Bengali, and in some cases Urdu	Phone, social media or radio	Accessible mainly to other women. Times of availability will vary for different groups
Stateless citizens and refugees	May be reluctant to meet government officials or those associated with the authorities	Bengali and Pashto mainly	Phone or social media	May only be willing to talk to NGO workers and community organizers who have been in contact with

4. Stakeholder Engagement Program

The Project is being prepared under the World Bank's Environment and Social Framework (ESF) and as per the Environmental and Social Standard ESS 10 on "Stakeholder Engagement and Information Disclosure," the implementing agencies are required to provide stakeholders with timely, relevant, understandable and accessible information and consult with them in an appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

This stakeholder engagement program is unique in that it is beginning at a time when a global pandemic has wreaked havoc across the world, including Pakistan. While nobody can accurately predict the course of the pandemic, it is safe to assume, given Pakistan's recent rates of disease transmission, that standard operating procedures (SOPs) for social distancing and infection containment will be very much in place for the next three to four months (i.e. until October 2020), and perhaps even till the end of this year if not beyond. The engagement program has been prepared keeping these circumstances in mind.

This section delineates how the engagement program is being conceived and will be carried out.

4.1. Purpose and Timing

Purpose

The purpose of stakeholder engagement is to ensure that all groups that either have an interest in the project, or stand to be affected, either positively or negatively, can participate in the project design process to identify flaws and point out possible obstacles; engage in implementation by highlighting what is going well and what isn't; and generally work with project proponents to ensure that the project proceeds such that its benefits are multiplied and possible negative fallouts minimized. In general, engagement will be directly proportionate to impact and influence of a stakeholder. As the extent of impact of the project on a stakeholder group increases, engagement with that particular stakeholder group will intensify and deepen.

Timing

Stakeholder engagement will take place in three phases – in the project preparation phase (ongoing), while the project is being implemented, and lastly in the first few months after project activities have been wrapped up. In the first set of consultations, which took place in mid June 2020, the groups contacted included a community living near Gujjar Nullah, a 28 km. long storm water drain running through the city; a community living at Jam Chakro; communities living near the proposed site at Dhabeji; some selected interviews with waste vendors and recyclers, and consultations with community workers engaged in grassroots development work in Machar Colony, an informal settlement populated mainly by low income households of Bengali origin, who are engaged in waste picking among other operations. Due to the ongoing COVID-19 crisis, focus groups were restricted in size, and not more than ten persons (and generally five or six) participated where group discussions were held (in Dhabeji, Jam Chakro and in the Gujjar Nullah community).

In the preparation stage, given time constraints, engagement has been limited to interactions with program affected parties. The purpose of engagement at this stage is to apprise the

stakeholder groups of planned activities, and to ensure that valid concerns of stakeholders and useful suggestions are taken on board and addressed before program activities are finalized.

In the project implementation stage, consultations will be carried out with affected parties, and other interested parties. Vulnerable groups likely to be affected by integration of ministries will be consulted, both in separate groups, and by making sure that their representatives are included in the consultations with affected parties and others. In this phase, the emphasis will be on disseminating information on how activities are proceeding, getting feedback on impacts, and consultations on how activities can be carried out such that any negative effects (if any) are mitigated.

Engagement after program conclusion will focus on all identified stakeholder groups. At this stage of the process, the emphasis will be on understanding whether the project has achieved its objectives.

The periodicity of consultations will vary through the project cycle. In the preparation stage, community level consultations, as well as discussions with experts are taking place in June 2020, focusing mainly on project affected parties. In the program implementation stage, consultations will be planned monthly or quarterly, depending on the stakeholder group, and the activities to be discussed. In the post program implementation phase, a fixed number of consultations will be carried out.

As pointed out in Section 1, COVID-19 has necessitated a new approach to consultation and contacts with communities and the general public. Face to face community interaction has had to be conducted in small groups in suitable locations (allowing for light, air, and for participants to sit a reasonable distance apart). In densely populated communities where following the SOPs may have been problematic, FGDs were discarded in favor of key informant interviews. Experts were consulted mainly through phone interviews. As the project proceeds and if COVID restrictions continue, the reliance on communication through meeting apps, and the dissemination of information through electronic and social media will continue. As COVID restrictions are relaxed, some forms of electronic communication will be replaced in communities with face to face contact through social organizers or community-based workers, and workshops or roundtables/people’s assemblies will be organized.

4.2. Proposed Strategy for Information Disclosure

An uninterrupted two-way flow of information is crucial to the success of any stakeholder engagement program. This is particularly true for sensitive projects which are likely to have widespread impacts across a range of stakeholders covering almost all income groups, having access to vastly different recreational and residential facilities, and having (in some noteworthy cases) an interest in letting the status quo continue. Since SWEEP is just such a project, it is vital that accurate information is disseminated to the relevant stakeholders and the affected parties at the beginning, and updates are provided at regular intervals as the project proceeds. It is also necessary to give stakeholders ample time to formulate their response and provide feedback during the engagement process. Various modes of communication would be used to disseminate the necessary information to the relevant stakeholders as given in the table below. Key messages will be conveyed in the national as well as relevant regional languages to facilitate a broader audience. This is summarized in the table below.

Table 4.1: Information Disclosure

<i>Project activities</i>	<i>List of Information to be disclosed</i>	<i>Methods proposed</i>	<i>Timetable: Locations/ Dates</i>	<i>Target stakeholders</i>	<i>Percentage reached</i>	<i>Responsibilities</i>
Cleaning of waste from <i>nullahs</i> obstructing the flow of water	List of <i>Nullahs</i> and localities where these activities would take place.	Relevant documents should be uploaded on website;	At project design phase.	Project Affected parties	Not applicable	CLICK PIU and KMC
Construction of temporary storage and dewatering facility for waste cleared from <i>nullahs</i> at Jam Chakro, before its final disposal in the new sanitary disposal cell to be constructed at Jam Chakro	The plan of shifting the waste taken out of <i>Nullahs</i> – transport routes, new location etc.	Documents shared with the relevant Government departments and experts in consultative sessions.		Vulnerable Groups Experts		NGOs to take forward consultations with community using COVID appropriate media In COVID days, experts to be contacted through meeting software
		For the communities, an advertising campaign using billboards and panaflexes on main streets and in neighborhoods				
		A brief video message on cable TV, and circulated on social media (WhatsApp, Tik tok, Instagram, Facebook)				
		Community based partners to take message to community through video link talks with community leaders				
Communication and outreach activities aimed at communities living around the <i>nullahs</i> to encourage residents to limit dumping of household waste into <i>nullahs</i> .	Communication strategy for the campaign and key messages.	Campaign pamphlets material to be posted online. Dissemination of the material through social media. (Tik Tok and other)	At Project implementation stage, prior to the initiation of the cleaning of <i>Nullahs</i>	Communities living next to <i>Nullahs</i>	Not applicable	KMC, DMCs, CLICK PIU, NGOs

<i>Project activities</i>	<i>List of Information to be disclosed</i>	<i>Methods proposed</i>	<i>Timetable: Locations/ Dates</i>	<i>Target stakeholders</i>	<i>Percentage reached</i>	<i>Responsibilities</i>
		<p>Corner and Community meetings to increase awareness in the community once COVID has eased.</p> <p>Messages in the community through panaflex, hoardings etc.</p> <p>NGOs to establish contact with community leaders during COVID using phone based apps and other video links</p>				
Construction of new sanitary disposal cell at Jam Chakro	<p>Plan for construction of the new cell at Jam Chakro.</p> <p>Plans for all the associated activities planned under this activity.</p>	<p>Relevant documents should be uploaded on website</p> <p>In COVID days, experts to be contacted through meetings software. Post COVID consultations can be in person</p> <p>PIU to share the information and coordinate with various government departments involved in a consultative workshop</p> <p>Community consultations should be held at Jam Chakro to explain the</p>	<p>This should be done during the preparation stage of the subcomponent and community consultations should be carried out at Jam Chakro</p>	<p>Relevant Government Departments and experts</p> <p>Community living on Jam Chakro site.</p>	<p>Not Applicable</p>	<p>PIU, KMC, SSWMB, NGOs</p>

<i>Project activities</i>	<i>List of Information to be disclosed</i>	<i>Methods proposed</i>	<i>Timetable: Locations/ Dates</i>	<i>Target stakeholders</i>	<i>Percentage reached</i>	<i>Responsibilities</i>
		program to the local community. During COVID days, this is to be done by using the good offices of NGOs such as AI Khair who run a school there. The school master and female teacher may contact community leaders using social media or through phone				
Construction/ Upgrading of Transfer Stations in the City.	Location of planned transfer stations	PIU to share the information on their location, and plans on construction with relevant government departments in a consultative workshop. Information made available on the website Experts to be consulted using meeting software. Post COVID consultations can be in the form of meetings NGOs to use COVID appropriate means to reach community leaders	These consultations should be held at design stage of the sub-component	KMC, DMCs, SSWMB and Community living close to the proposed sites	Not Applicable	PIU SSWMB, KMC, DMC, NGOs
Retrofitting of Existing and Construction of New <i>Kachra kundis</i> at appropriate locations.	The plan on upgradation of the existing <i>Kachra kundis</i> and the	Material placed on the website Shared with relevant	These should be completed at the planning stage of the process.	Relevant Government Departments and local communities.	All	PIU SSWMB, NGOs

<i>Project activities</i>	<i>List of Information to be disclosed</i>	<i>Methods proposed</i>	<i>Timetable: Locations/ Dates</i>	<i>Target stakeholders</i>	<i>Percentage reached</i>	<i>Responsibilities</i>
	location of the new points.	<p>departments in a consultative workshop.</p> <p>In COVID days, experts to be contacted through meetings software. Post COVID consultations can be in person</p> <p>Use of billboards for electronic ads. Video ads to be circulated on social media also</p> <p>During COVID outbreak, NGOs to reach out to community through community leaders using social media apps</p>				
Development of Advanced Waste Treatment Solutions, including modern landfilling capacity at Dhabeji, and treatment of non-municipal waste streams	Plan for the new site and its PC1	<p>Relevant documents should be uploaded on website;</p> <p>Plan and design to be shared with relevant departments in a consultative workshop.</p>	As soon as the design is finalized by the relevant departments.	Civil society, NGOs, local community and Ministry of Industries.	Not Applicable	PIU, SSWMB
Provision of Equipment and Machinery to Local Councils and SSWMB	Details of all the equipment being provided and the relevant procurement material	Website PIU, KMC and SSWMB	Program Implementation phase	KMC, DMCs, SSWMB.	Not Applicable	PIU, KMC and DMCs

<i>Project activities</i>	<i>List of Information to be disclosed</i>	<i>Methods proposed</i>	<i>Timetable: Locations/ Dates</i>	<i>Target stakeholders</i>	<i>Percentage reached</i>	<i>Responsibilities</i>
Project Management and Implementation Support	Project Documents with details of various activities	Website PIU	Program planning phase	KMC, DMCs, SSWMB, Local Communities, NGOs, Environmental Protection Agency, Department of Industries, P&D Department	All	PIU

4.3. Proposed Strategy for Consultation

As given in the table above, there is a variety of information that is to be disclosed to stakeholders over the course of project preparation and implementation. The information will be disseminated using relevant strategies depending on the stakeholder group and the program stage. Stakeholders will be provided draft documents in advance of consultations. This is summarized in the table below.

Table 4.2: Strategy for Stakeholder Consultation

<i>Activities</i>	<i>Target stakeholders</i>	<i>Topic of engagement</i>	<i>Method used</i>	<i>Location/ Frequency</i>	<i>Responsibilities</i>
Cleaning of waste from <i>nullahs</i> obstructing the flow of water	KMC, DMC, SSWMB, Community at Jam Chakro	Key activities and logistics associated with this activity.	Consultative workshops. Focus group discussions	One consultative workshop to be carried out during the preparation phase, and another when the process gets underway, for better coordination and course correction.	KMC and CLICK PIU. NGOs
Construction of temporary storage and dewatering facility for waste cleared from <i>nullahs</i> at Jam Chakro before its final disposal in the new sanitary disposal cell to be constructed at Jam Chakro		Potential impact of establishing temporary storage cell at Jam Chakro	In COVID days, an extensive advertising campaign based on social media and electronic media In COVID days, experts to be reached through electronic meeting software Using NGOs to contact community leaders to	Electronic messages to be disseminated throughout the period of activity	

<i>Activities</i>	<i>Target stakeholders</i>	<i>Topic of engagement</i>	<i>Method used</i>	<i>Location/ Frequency</i>	<i>Responsibilities</i>
			spread the message		
Communication and outreach activities aimed at communities living around the <i>nullahs</i> to encourage residents to limit dumping of household waste into <i>nullahs</i> .	Local Community living along <i>Nullahs</i> .	Proper methods of garbage disposal and civic awareness.	Corner Meetings In COVID days, an extensive advertising campaign based on social media and electronic media, including jingles/songs In COVID days, experts to be reached through meeting software Using NGOs to contact community leaders to spread the message	To be carried out in the identified locations and through an advertising/social media campaign To be conducted before the initiation of cleaning of waste from <i>nullahs</i> .	KMC, DMC, SSWMB, CLICK PIU, NGOs
Construction of new sanitary disposal cell at Jam Chakro	Community at Jam Chakro, KMC and SSWMB	The proposed new site plan and execution of the project. Impact these activities would have on the local community at Jam Chakro.	Consultative Workshop with Government Departments. In COVID days, an extensive advertising campaign based on social media and electronic media FGDs with local community at Jam Chakro through local NGOs, using small groups following SOPs. NGOs to reinforce messages by remote meetings with community leaders	PIUs office and should be carried out at the design phase of the project. Community consultations should be carried at Jam Chakro during the design phase of the project, and also when the upgradation process gets underway.	PIU, NGOs
Construction/ Upgrading of Transfer Stations in the City.	KMC, DMC, SSWMB and	Location of the sites, design and work schedule	Consultative Workshop with Government Departments.	At PIU office At local communities, and one meeting	PIU, NGOs

<i>Activities</i>	<i>Target stakeholders</i>	<i>Topic of engagement</i>	<i>Method used</i>	<i>Location/ Frequency</i>	<i>Responsibilities</i>
	Local Communities where new transfer stations would be established	Impact on local community	In COVID days, an extensive advertising campaign based on social media and electronic media In COVID days, experts to be contacted using meeting software Using NGOs to contact community leaders to spread the message and get feedback	should be conducted before the project is designed and one when the implementation starts on the ground. Advertising campaign and electronic/social media-based outreach to continue through design and implementation phase	
Retrofitting of Existing and Construction of New <i>Kachra kundis</i> at appropriate locations.	KMC, DMCs, and SSWMB, Communities	Location of the nee sites. Plan for upgradation Potential Environmental Impact Impact on the local community	Consultative workshops with various Government departments. FGDs through NGOs with communities where new <i>Kachra kundis</i> would be made. In COVID days, an extensive advertising campaign based on social media and electronic media In COVID days, experts to be contacted using meeting software Using NGOs to contact community leaders to spread the	These consultations should be done at the design phase of the project, and new locations should be marked after these meetings.	PIU, NGOs

<i>Activities</i>	<i>Target stakeholders</i>	<i>Topic of engagement</i>	<i>Method used</i>	<i>Location/ Frequency</i>	<i>Responsibilities</i>
			message and get feedback		
Development of Advanced Waste Treatment Solutions, including modern landfilling capacity at Dhabeji, and treatment of non-municipal waste streams	KMC, SSWMB, Department of Industries, Environmental Protection Agency and Community at Jam Chakro	Plans for the new site.	Consultative Workshop FGDs with Community at Jam Chakro using local NGOs In COVID days, FGDs with local community at Jam Chakro through local NGOs, using small groups following SOPs.	PIU to hold these consultations before the finalization of the design. At Jam Chakro during the implementation phase of the project. This would help understand the impact of potential loss of livelihood due to a new site.	SSWMB and PIU, NGOs
Provision of Equipment and Machinery to Local Councils and SSWMB	KMC and DMCs	Needs Assessment	Consultative session.	During the design phase of the project.	PIU
Project Management and Implementation Support	KMC, DMCs, SSWMB, Environment Protection Agency, Department of Industries	Project Components and streamlining its implementation	Working Group	All stages of the project and should meet monthly to review the progress of the project.	PIU

4.4. Proposed Strategy to Incorporate the View of Vulnerable Groups

Vulnerable stakeholders are not a homogenous group. Some may be receptive to immediate and direct contact with a government agency and may be vocal about their concerns. At the other extreme, there may be some groups who are reluctant to be contacted at all, perhaps because of their legal status or any other reason. Varying strategies will thus have to be adopted.

The project proponents will appoint a Social Development Specialist (SDS) in the PIU who will lead the consultations with vulnerable groups. The Specialist will formulate a strategy for engagement at project commencement, but will broadly follow the steps below.

Identification of Potential Partners: As a first step, the SSS will identify NGOs and community-based organizations working with vulnerable groups, particularly in areas (for example in settlements along *nullahs* and other *katchi abadis*) which are near the front lines of project activity. This mapping exercise will classify these partners by a) area/location of operations; b) nature of intervention or type of activity; c) sector(s) of interest and d) expertise in work,

for example with stateless persons or in the informal recycling industry. Partners working in low-income areas with extremely vulnerable communities, those with relevant expertise, those with experience of research and policy analysis of SWM, or implementation of SWM programs will be singled out during the mapping exercise. A total of five or six such organizations will be shortlisted for further engagement. The selection will be made by consensus, involving staff from the PIU, SSWMB, KMC and social development specialists from the World Bank.

Consultation with Partners: At the next stage, meetings will be organized with representatives of the chosen partners, at first individually, and then in a group, to apprise them of the objectives of the stakeholder engagement program. The sensitivities of the project and its possible impact on certain activities in the informal sector will be highlighted in particular. The requirements of the stakeholder engagement program, with regard to consultations with communities, and vulnerable groups in particular, will be shared with them, and their inputs sought on how best to establish contact and create an atmosphere of mutual trust. The shortlisted partners will then be asked to enter into formal partnership agreements with the PIU for the duration of the project.

While the more detailed strategy for interaction with vulnerable groups will be chalked out once partners are on board, the SSS will not only guide the partners, but will also chalk out a program of regular contacts with stakeholder groups which he or she will lead in person. The Specialist will also prepare a workplan and strategy, giving the timelines for outreach with different groups, linked to different phases of project implementation. At each stage of project implementation, and for each type of outreach activity, the Specialist will define how consultations will take place (in person, through community-based organizations in the field), how records of consultation will be maintained, and how concerns raised etc. will be responded to.

5. Resources and Responsibilities for Implementing Stakeholder Engagement Activities

5.1. Resources

It is estimated that the SEP will require technical assistance of approximately \$500,000 which amounts to \$100,000 per year for five years. This will include the cost of deploying field teams, the cost of hiring venues and arranging facilities such as meals etc. for participants of consultations, research studies and surveys and other miscellaneous costs.

The stakeholder engagement effort will be led by the Social Development Specialist at the PIU. He/She will have the means to commission data gathering efforts and analytical work if needed, and get any field support as required.

This information about resources will be updated once further details of the design are finalized and the updated SEP will be redisclosed.

5.2. Roles and Responsibilities

The table below delineates the roles and responsibilities of different agencies for different phases of the project. The same entities will be relied upon to respond to stakeholders during relevant phases of the project.

Table 5.1: Roles and Responsibilities

<i>Activities</i>	<i>Responsibilities</i>
Cleaning of waste from <i>nullahs</i> obstructing the flow of water	KMC, DMCs and CLICK PIU. Partners for community outreach
Construction of temporary storage and dewatering facility for waste cleared from <i>nullahs</i> at Jam Chakro, before its final disposal in the new sanitary disposal cell to be constructed at Jam Chakro.	
Communication and outreach activities aimed at communities living around the <i>nullahs</i> to encourage residents to limit dumping of household waste into <i>nullahs</i> .	KMC, DMCs, CLICK PIU, Local Governments. Partners for community outreach and possibly a Communications company to design a campaign
Construction of new sanitary disposal cell at Jam Chakro	SSWMB, PIU, partners for community outreach
Construction/ Upgrading of Transfer Stations in the City.	KMC, SSWMB, PIU, partners for community outreach
Retrofitting of Existing and Construction of New <i>Kachra kundis</i> at appropriate locations.	DMCs, SSWMB, PIU, partners for community outreach
Development of Advanced Waste Treatment Solutions, including modern landfilling capacity at Dhabeji, and treatment of non-municipal waste streams	SSWMB, PIU, partners for community outreach
Provision of Equipment and Machinery to Local Councils and SSWMB	PIU and DMCs
Project Management and Implementation Support	PIU

6. Grievance Mechanism

This section lays out the existing grievance redress mechanisms (GRM) in place in the two key institutions responsible for project implementation, in addition to delineating proposed GRM procedures for the project itself. As per World Bank requirements, GRM systems are an integral component of the project administration. Paragraph 26 of ESS 10 says that, “the Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances.”

6.1. Existing Mechanisms

SSWMB: Grievance redress mechanisms are now a fundamental element in all service delivery departments of the GOS. In case of SSWMB, the Board operates a Citizens Portal where citizens can log in suggestions and complaints on all SWM related issues.⁷ Complaints are automatically forwarded to the concerned Deputy Director for appropriate remedial actions. Citizens can upload pictures/videos/audio files or even handwritten text files in support of their complaints. The portal also enables the SSWMB to communicate directly with citizens to make routine and urgent announcements. The Board also maintains a Facebook page which is updated regularly, and which allows FB users to send messages directly, or use an email address displayed on the page to file complaints or give suggestions.

KMC: KMC also has an online complaint system through its website.⁸ Overall, KMC has set up a system called Citizen Complaint and Information System (CCIS), through which complaints of the citizens are registered and managed. Under this system the citizens can lodge a complaint through three methods:

- Citizen’s Call Center which is functional 24/7 and can be easily accessed on their dedicated number.
- Citizens can also walk into one of the facilitation centers that are spread across 21 locations throughout the city, and lodge a complaint.
- The complaints can also be lodged through the online portal, where basic information like nature of complaints, departments, CNICs and phone number is required to lodge a complaint.

Once a complaint is recorded in the system, they are all logged into a CCIS central database. The complaints from the central database are then sent to the relevant departments and officials, and the status of the complaint is monitored through the system. Once the relevant official marks the complaint as resolved, the Quality Control Section of CCIS, gets in touch with the complainants and confirms whether their complaint was resolved or not. If the complaint is still unresolved, it’s not only redirected but also accelerated to higher officials of the relevant

⁷ See: http://sswmb.gos.pk/cms/?page_id=1534

⁸ See: <http://complaint.kmc.gos.pk/ccis/General/Complaint/LogNew.aspx>

department for resolution. The entire complaint management system can also be viewed in real time by the relevant officials, such as the Mayor and Deputy Mayor.

While the government agencies have made an effort to design and operationalize GRM systems as detailed above, the consultations with communities carried out for this project show that communities are not familiar with, and not convinced of the efficacy of these systems. If anything, they prefer to approach government service providers through informal, roundabout means, preferably through their elected representatives (local councilors or sometimes the MNA or MPA). While there is nothing wrong with going to the political leadership for problem solving, the service providers are working hard to encourage the use of institutional GRM systems, so that they can effectively monitor the quality of services, and are in touch with their consumers/clients. As such, the SSWMB and KMC will use SWEEP as a vehicle to enhance existing GRM systems and work with greater focus on systems that close the feedback loop. Until project GRM systems are in place, the existing GRM systems, mainly KMC's CCIS, will be utilized during the implementation of Component 1.

6.2. GRM Systems for the Project

The project will have its own GRM system as delineated below. Until this is in place, queries and complaints related to the project can either be directed through existing GRM systems (described in Section 6.1), or can be routed to the following:

Mr. Kaushif Gulzar, Managing Director, SSWMB
Tel: 021-99333701, Email: md@sswmb.gos.pk

Dr. Syed Saif ur Rehman, Metropolitan Commissioner, KMC
Tel: (021)99216095, Email: commissioner@kmc.gos.pk

Mr. Zubair Ahmed Channa, Project Director, SWEEP
Email: zubairchanna@gmail.com

A Grievance Redress Committee (GRC) will be constituted at the PIU, managed by the Social Development Specialist (SDS). Other than SDS, the Committee will draw on existing resources at the SSWMB and will comprise of four additional members as follows.

Table 6.1: Constitution of the Grievance Redress Committee

<i>Designation</i>	<i>Parent Department</i>
Head of the GRC	SSWMB
Director GRC	SSWMB/PIU
Social Development Specialist (SDS)/Secretary to GRC	PIU
Administrator and Investigation	PIU
Nominee from KMC	KMC
Nominees (including one woman) of APs	Communities

Thus, a designated officer from the SSWMB will serve as Head of the GRC. The Head of the GRC, Director GRC, and the nominee from KMC will work at their parent agencies, but will be available to the GRC to decide on complaints that need responses from senior officials or inter-departmental cooperation, or which are otherwise complex in some way. Day to day issues will be handled by the SRS, with assistance from the Resettlement Specialist, an Administrator and support staff who will handle the GRM system. An officer with experience of working in the CCIS of the KMC will be nominated by KMC over the initial months of the project to address any complaints concerning cleaning of nullahs.

GRM System

As a first step, an online complaint registration system will be set up for the project, which will also link with the SSWMB's Citizen's Portal. Thus, it will pick up relevant complaints from the Portal, as well as complaints registered on it directly. Complaint registration will be structured such that complaints can be entered directly on the website (in English or Urdu); can be posted to a designated address as letters or written messages; or can be narrated to operators on a helpline. All complaints, however made, will be consolidated into a database on a daily basis, and separated by location as well as subject.

As a second step, grievances/complaints will be screened and classified into three categories by order of priority, with those requiring instant action being classified as high priority. A set of criteria will be made to determine what sort of grievances/complaints fall into which category. All registered grievances/complaints will be acknowledged through a text message or phone call. If no telephone number is supplied by the complainant, he or she will be asked through a letter to check back with the PIU. This acknowledgement will be issued within one day of receipt of the grievance/complaint. Each complainant will be given an estimated timeframe for resolution of the grievance/complaint.

Grievances will be investigated and resolved within the timeframe specified, which will not be longer than ten days. If resolution demands longer than this timeframe, the complainant will be informed, and will be contacted by staff from the PIU to explain details of the issue. Grievances which require cooperation of a number of departments, or which are otherwise complicated, will be referred to the GRC who will specify how resolution is to take place.

Records of all grievances/complaints will be maintained in a database, including details of actions taken to resolve the issue, and dates on which resolution was effected. At the conclusion of action to solve grievances, the complainants will be informed of the outcome. Two days after action is closed and complainants informed, they will be contacted again to ensure that they are satisfied with the work done. The system will include a system for Appeals. If a complainant remains unsatisfied, he/she will be able to lodge an appeal, which will be escalated to the Head of the GRC or the Director.

Handling Gender Based Violence (GBV) and Violence and Against Children (VAC) issues

The project will be particularly sensitive to GBV and VAC issues given that its key stakeholders include marginalized communities, whose women and children are particularly vulnerable to abuse. Grievances related to GBV will be handled as a separate, category within the GRM system. The PIU staff responsible for receiving complaints, the SDS and Resettlement Specialist will receive training on receiving complaints regarding GBV and VAC from a certified and

reputable organization/NGO focusing on issues of GBV and VAC. The organization will also draw up a list of established service providers who can provide support to GBV and VAC survivors and all relevant cases will be referred accordingly. This element of the GRM will be further refined in light of the GBV Action Plan that will be prepared for the project.

7. Monitoring and Reporting

The PIU will include a Monitoring Unit which will devise a complete project monitoring plan and schedule in accordance with project implementation activities.

The table below summarizes reporting activities and is indicative at this stage. The system will be delineated in more detail in the updated SEP to be ready within 60 days after project effectiveness.

Table 7.1: Monitoring and Reporting

<i>Activities</i>	<i>Involvement Mechanisms</i>	<i>Mechanisms for Reporting Back to Stakeholders</i>
Cleaning of waste from <i>nullahs</i> obstructing the flow of water	Spot Checks and surveys/FGDs to be conducted in Jam Chakro. Third party monitoring of nullah cleaning aftermath to be conducted four weeks post emergency operation	Progress report made available on the website
Construction of temporary storage and dewatering facility for waste cleared from <i>nullahs</i> at Jam Chakro, before its final disposal in the new sanitary disposal cell to be constructed at Jam Chakro		Presented to the relevant stakeholders in the project coordination committee. Made available to community through brief video packages, and supplemented by NGOs conducting consultations in the community. During COVID, methods would shift to more electronic/social media-based means, and contacts mainly with community leaders, or with small community groups. SOPs to be followed at all times
Communication and outreach activities aimed at communities living around the <i>nullahs</i> to encourage residents to limit dumping of household waste into <i>nullahs</i> .	Small scale surveys, or phone surveys to assess the penetration of messages.	Progress report made available on the website Presented to the relevant stakeholders in the project coordination committee.
Construction of new sanitary disposal cell at Jam Chakro	Spot checks to get an update on the quality and speed of work. Small survey with the local community on impacts of the new facility Third party monitoring of impacts of cell three months after construction of facility and at the end of the project period	Progress report made available on the website Presented to the relevant stakeholders in the project coordination committee. Made available to community through brief video packages, and supplemented by NGOs conducting consultations in the community. During COVID, methods would shift to more electronic/social media-based means, and contacts mainly with community leaders, or with small community groups. SOPs to be followed at all times

<i>Activities</i>	<i>Involvement Mechanisms</i>	<i>Mechanisms for Reporting Back to Stakeholders</i>
Construction/ Upgrading of Transfer Stations in the City.	Spot checks to get an update on the quality and speed of work.	Progress report made available on the website Presented to the relevant stakeholders in the project coordination committee.
Retrofitting of Existing and Construction of New <i>Kachra kundis</i> .at appropriate locations.	Spot checks to get an update on the quality and speed of work. Small survey with the local community on impacts of the new facility Third party monitoring of impacts of cell three months after construction of facility and at the end of the project period	Progress report made available on the website Presented to the relevant stakeholders in the project coordination committee. Made available to community through brief video packages, and supplemented by NGOs conducting consultations in the community. During COVID, methods would shift to more electronic/social media-based means, and contacts mainly with community leaders, or with small community groups. SOPs to be followed at all times
Development of Advanced Waste Treatment Solutions, including modern landfilling capacity at Dhabeji, and treatment of non-municipal waste streams	Spot checks to get an update on the quality and speed of work. Small survey with the local community on impacts of the new facility Third party monitoring of impacts of cell three months after construction of facility and at the end of the project period	Progress report made available on the website Presented to the relevant stakeholders in the project coordination committee.
Provision of Equipment and Machinery to Local Councils and SSWMB	Inventory check of all the procurements made.	Progress report made available on the website Presented to the relevant stakeholders in the project coordination committee.
Project Management and Implementation Support	Progress should be measured against timeline	Progress report made available on the website Presented to the relevant stakeholders in the project coordination committee.

This SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major

changes to the project related activities and to its schedule will be duly reflected in the SEP. Any revised SEP will be reviewed and cleared by the Bank and redisclosed.