Program's Stakeholder Engagement Plan for PforR Component (P-SEP)

May 2026

Punjab Clean Air Program (PCAP)

Coordination & Monitoring Unit (CMU)

Planning & Development Board, Punjab



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Table of Contents

1. Introduction 2
1.1. Program Description: 2
1.2. Environmental and Social (E&S) Context of P-SEP 5
2. Objective of P-SEP 7
3. Stakeholder Identification and Analysis: 8
3.1. Methodology 8
3.2. Affected Parties 9
3.3. Other interested parties 10
3.4. Disadvantaged / vulnerable individuals or groups 11
4. Stakeholder Engagement Program 15
4.1. Summary of stakeholder engagement done during Program preparation 15
4.2. Summary of Program Stakeholder ‘s Needs and Methods, Tools and Techniques for stakeholder engagement 17
4.3. Proposed strategy to incorporate the views of vulnerable groups 20
5. Resources and Responsibilities for Implementing Stakeholder Engagement 22
5.1. Implementation Arrangements and Resources 22
6. Grievance Mechanism 24
6.1. Description of Grievance Mechanism (GM) 24
6.2. Appeals Process and Confidentiality 27
7. Monitoring and Reporting 30
7.1. Summary of how SEP will be monitored and reported upon 30
7.2. Reporting back to stakeholder groups 30
Annex 1: Details of Stakeholder Consultations 32
Annex 2: P-SEP Budget Table 36
Annex 3. Sample Table: Monitoring and Reporting on the SEP 37
Annex 4. Existing Provincial and Departmental Grievance Mechanisms 40

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1. Introduction

1.1. Program Description:

Air pollution poses a chronic health threat in Punjab and has become a national and provincial priority. The Government of the Punjab (GoPb) has started to lay the foundation for improved air quality management (AQM) planning and governance, which are essential building blocks for reducing air pollution. Policies and plans such as the 2017 Smog Control Policy, the 2022 Health Advisory System for Critical Air Pollution Events, the 2023 Clean Air Policy and Action Plan, and the new 2024 Smog Mitigation Action Plan demonstrate GoPb's commitment to improving air quality. The plans focus on abating $PM_{2.5}$ in the transport, environment agriculture, industry, energy, and municipal sectors, while promoting public awareness and engagement.

The Punjab Clean Air Program's (PCAP), objective is to strengthen air quality management and reduce emissions from targeted sectors across Punjab. The Program is focused on managing road transport, industrial and agriculture emissions. This operation entitled the "Punjab Clean Air Program (PCAP)" supported the government's plans to curb emissions across priority sectors, viz. transport, industries and agriculture, with studies in the industry. The Program cost is 300 US$ million. The Program uses a hybrid approach that combines the World Bank's PforR and IPF instruments. The PforR component cost is US$280 million aims to strengthen AQM and reduce emissions from targeted sectors, while the IPF component cost 20 US$ million which covers the TA component. It will achieve these objectives through three results area across sectors to tackle air pollution sources by 2035:

(i) Air Quality Management Governance and Awareness Raising,
(ii) Transport Sector Abatement Measures, and
(iii) Agriculture and Industry Sector Abatement Measures.

The **Table 1** below illustrate the PforR component with its respective RAs, and Disbursement Link Indicators (DLIs),

Table 1: PforR (US$ 280), RAs and DLIs

Purpose of DLI	DLI	Agency Responsible	Financing (US$ mil)
Results Area 1: Air Quality Management Governance and Awareness Raising (US$ 20 mil)			

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Strengthen air quality monitoring on a continuous basis	**DLI-1:** Additional regulatory grade monitors added to air quality monitoring network	EPCCD	9
Strengthen air quality management governance	**DLI-2:** Integrated air pollutant/SLCP/GHG emissions inventory system is developed and routinely updated, used for assessment of Smog Action Plan and informs annual development plans	EPCCD	6
Strengthen air quality monitoring infrastructure	**DLI-3:** Fuel quality testing laboratories with mobile and fixed facility operational	EPCCD	3
Enhance public awareness campaign and citizen engagement	**DLI-4:** Interactive public information and awareness sessions held	EPCCD	2
Results Area 2: Transport Sector Abatement Measures (US$ 240 mil)			
Expand public transport provisions with electric buses to encourage modal shifts away from private vehicles	**DLI-5:** Expand Cleaner Public Transport in Lahore Division (Electric Buses)	T&MD via PMA/PTC	140
Catalyze a transition towards cleaner 2/3Ws	**DLI-6:** Transition to Electric Two- and Three-Wheelers (new vehicles)	T&MD	50
Expand vehicle inspections and strengthen nexus with vehicle licensing and retirement	**DLI-7**: Expand vehicle inspections	T&MD	10
Scrap polluting vehicles with appropriate financial incentives	**DLI-8:** Buyback of aged polluting vehicles	T&MD	40
Results Area 3: Agriculture Sector Abatement Measures (US$ 20 mil)			

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Improve mechanized rice straw management to reduce crop residue burning	**DLI-9:** Expanding mechanized rice straw management	AD	20

The IPF component of US$20 million will support the technical assistance and studies required to facilitate Program implementation, and design interventions. A full list of activities under this component is included in the **Table-2** below:

Table 2: IPF Component (20 US$ mil) Details

Activity	Description	Agencies
E-bus business models	To determine appropriate business models for e-bus deployment in Punjab. Transport feasibility studies are already underway under the government program.	T&MD, PMA, PTC
Public transport satisfaction survey	To gather regular feedback on the experience of passengers on public transport.	T&MD, PMA, PTC
Buyback scheme	Consultancy service to design buyback scheme for polluting vehicles and the scrappage mechanism, informed by stakeholder consultations.	T&MD, Punjab Provincial Transport Authority (PPTA)
Battery waste management	Consultancy service to develop battery waste management rules and identify strategies for ecosystem development.	PCAP-CMU, supported from EPCCD, T&MD
2W inspections	Consultancy services to develop legal, financial, and technical framework for inspection and emission certification of 2Ws.	T&MD, PPTA
E-2/3W adoption	Technical assistance (TA)/consultancy to design e-2/3W financing facility.	T&MD
Carbon credits	End-to-end process for monetizing GHG emissions reductions from the shift to cleaner vehicles in the form of carbon credits.	PCAP CMU
Institutional strengthening (transport)	The component will support institutional strengthening for transport sector agencies with a focus on curbing road transport emissions, bus procurement and contract management, and road safety.	T&MD

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Industry detailed study	Detailed study of cleaner technologies and alternative less polluting combustion fuels for boilers, furnaces, and brick kilns. The study will first map the problem in Lahore Division and three districts, and then propose a set of solutions, considering many different scenarios. The study will inform downstream implementation.	PCAP CMU, Industries, Commerce and Investment Department, EPCCD
Other studies	Any other studies to support Program implementation as necessary.	PCAP CMU & PIU T&MD
Staffing & implementation costs	Staff salaries and miscellaneous expenses, aligned with the institutional arrangements described in Section III, will also be supported via the IPF component.	PCAP CMU & PIU, T&MD

1.2. Environmental and Social (E&S) Context of P-SEP

The Environmental and Social Systems Assessment (ESSA) for the Punjab Clean Air Program (PCAP) identifies the overall Environmental and Social (E&S) risk rating as Substantial due to the scale of interventions under air quality management, transport electrification, and agricultural mechanization. Activities on land parcels that result in the physical or economic displacement of more than 200 affected persons will not be eligible under the Program. Likewise, areas where an Anti-Encroachment Drive (AED) has been conducted after December 9, 2024, will be excluded from PCAP.While the Program is expected to generate significant environmental and public health benefits, several environmental and social risks require careful management through mitigation measures, institutional strengthening, and inclusive implementation approaches.

Key environmental risks include generation of electronic waste (e-waste) from air quality monitoring equipment and vehicle inspection systems; hazardous chemical handling and waste generation from fuel testing laboratories; and Occupational and Community Health and Safety (OHS/CHS) risks associated with construction activities, EV charging stations, bus depots, and battery storage areas. Risks related to lithium battery fires, improper recycling of batteries and scrapped vehicles, wastewater and sludge management at bus depots, and localized impacts such as dust, emissions, and waste generation have also been identified. In the agriculture sector, mechanized residue management may contribute to soil disturbance, emissions, biodiversity impacts, and increased fuel consumption.

The ESSA also highlights important social risks, including exclusion risks for women, persons with disabilities, low-income households, rural communities, older workers, and individuals with limited literacy or digital access. Vulnerable groups may face barriers in accessing awareness campaigns, financing schemes, mechanization support, EV services, and digital platforms. The transition toward electric mobility may adversely affect informal workers, including rickshaw drivers, small transport operators, traditional mechanics, and workers dependent on internal combustion engine technologies, potentially resulting in livelihood losses or resistance to enforcement measures. Similarly, stricter environmental enforcement and crop burning restrictions may disproportionately impact small industries and small-scale farmers.

Labor and workplace risks include occupational hazards linked with construction works, machinery operations, hazardous chemicals, battery handling, and informal recycling activities. The ESSA further identifies risks of Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH), particularly for women employed in e-bus operations and female users of public transport systems. Community concerns may also arise regarding vehicle inspections, enforcement actions, fare increases, relocation of encroachments, and implementation of buyback or retrofitting schemes without adequate transition support.

To address these issues, the ESSA recommends strengthening stakeholder engagement, ensuring accessible and inclusive grievance mechanisms, integrating SEA/SH-sensitive measures, improving labor and safety standards, supporting vulnerable and informal workers through transition measures, and enhancing awareness and outreach to underserved populations.

The SEP for PforR component of PCAP is being prepared, while the SEP of the PCAP's IPF component has been prepared and cleared by the bank, also disclosed on PCAP's website.

2. Objective of P-SEP

The overall objective of this P-SEP is to establish a structured and inclusive program for stakeholder engagement that ensures effective communication, transparency, and participation throughout the entire Program cycle. It focuses on facilitating timely public information disclosure and meaningful consultation with all relevant stakeholders, including farmers, communities, government institutions, and other interested parties. By promoting open dialogue, the P-SEP aims to build trust, improve decision-making, and ensure that stakeholder perspectives are integrated into Program planning and implementation.

In addition, the P-SEP defines clear communication channels and feedback mechanisms through which stakeholders can raise concerns, share suggestions, or lodge complaints related to Program activities. It places particular emphasis on reaching vulnerable and marginalized groups who may otherwise be excluded from Program benefits, ensuring their voices are heard and considered. Through targeted engagement strategies and inclusive practices, the plan seeks to promote equitable participation, enhance accountability, and support the overall effectiveness and sustainability of the program.

Key Objectives

1. To ensure effective and continuous stakeholder engagement throughout the Program lifecycle.
2. To promote transparent and timely public disclosure of Program information.
3. To facilitate meaningful consultation with all relevant stakeholders.
4. To establish clear and accessible communication channels.
5. To provide a functional mechanism for feedback, concerns, and grievance redress.
6. To ensure inclusion of vulnerable and marginalized groups in Program activities.
7. To incorporate stakeholder input into Program planning and decision-making
8. To ensure safe participation of all stakeholders, including vulnerable and marginalized groups, by protecting them from any form of intimidation, discrimination, or retaliation for expressing views, concerns, or grievances.
9. To enhance accountability, trust, and overall Program effectiveness.

3. Stakeholder Identification and Analysis:

3.1. Methodology

In order to meet best practice approaches, the Program will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach***:* Public consultations for the Program will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- **Informed participation and feedback:** Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the Programs is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of Program benefits, particularly women, the elderly, persons with disabilities, displaced persons, and communities, and the cultural sensitivities of diverse ethnic groups.
- **Flexibility:** If social distancing, cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibits traditional forms of face-to-face engagement, the methodology should adapt to other forms of engagement, including various forms of internet- or phone-based communication.

In the context of the PCAP, effective stakeholder engagement is essential for ensuring the successful implementation of the program's initiatives. Various stakeholders have interests, responsibilities, or impacts on the program's activities, and their involvement needs to be carefully managed to foster cooperation and minimize conflicts. The following stakeholders have been identified and analyzed for the IPF component. These stakeholders include affected parties (as defined in section 3.2), other interested parties (as defined in section 3.3) and disadvantaged/vulnerable individuals or groups (as defined in section 3.4).

3.2. Affected Parties

Affected parties include institutions, local communities, community members, and other parties that may be subject to direct impacts from the Program.

An initial identification of individuals and groups who fall within the category of affected parties is provided below. In addition to previously identified groups, affected stakeholders under PCAP also include informal transport operators who may be impacted by regulatory and emission control measures; mechanics and workshop owners potentially affected by the transition to electric vehicles and cleaner technologies; roadside workers who are exposed to high levels of vehicular emissions; waste handlers involved in the collection, handling, and disposal of batteries and other hazardous components from EVs; communities located in proximity to depots, terminals, charging stations, and related infrastructure; and traffic police, vehicle inspection staff, and enforcement personnel engaged in implementation of transport and emission control regulations. **Table 3** below describe the list of affected parties.

Table 3*:* List of Affected Parties as per the IAs

IA	Category	Stakeholders	Details
EPCCD	Directly Affected Parties	Small & Medium Industrial Units	Industries operating boilers, furnaces, and power systems affected by emission regulations and compliance requirements.
	Directly Affected Parties	Brick Kiln Owners	Operators impacted by emission control measures and potential technology transitions.
	Directly Affected Parties	Surrounding Communities	Communities exposed to industrial air pollution and emissions.
	Directly Affected Parties	Workers in Industrial Units	Workers exposed to occupational air pollution and potential regulatory changes.
	Beneficiaries	Manufacturers of Clean Fuel Alternatives	Entities benefiting from transition to cleaner fuels and technologies.
	Broader Interested Parties	Carbon Credit Market Participants	Entities engaged in carbon trading, including MRV companies and private sellers/buyers of credits.
	Regulators / Implementing Entities	EPCCD and Related Government Departments	Responsible for policy enforcement, monitoring, and carbon market facilitation.
T&MD / PMA / PTC	Directly Affected Parties	Informal Transport Operators	Individuals operating older or polluting vehicles affected by emission regulations and buyback schemes.
	Directly Affected Parties	Private and Commercial Vehicle Owners	Owners impacted by vehicle inspection, scrappage, and transition policies.

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	Directly Affected Parties	Mechanics and Workshop Owners	Small businesses potentially affected by shift to EVs and reduced demand for conventional repair services.
	Directly Affected Parties	Roadside Workers	Workers exposed to vehicular emissions along major transport corridors.
	Beneficiaries	E-Bus Operators and Staff	Drivers and operational staff benefiting from improved transport systems and employment opportunities.
	Beneficiaries	Public Transport Users	Urban commuters benefiting from cleaner and improved transport services.
	Directly Affected Parties	Battery Waste Handlers	Workers and entities involved in collection and disposal of EV batteries.
	Broader Interested Parties	Financial Institutions	Banks and financing bodies supporting EV adoption and fleet transition.
	Regulators / Implementing Entities	T&MD, PMA, PTC	Government bodies responsible for implementation, regulation, and oversight of transport programs.
Agriculture Department	Directly Affected Parties	Farmers and Agri-Businesses	Farmers affected by changes in residue management practices and machinery use.
	Beneficiaries	Farmers adopting Super Seeder Technology	Farmers benefiting from subsidies, rentals, and cleaner agricultural practices.
	Broader Interested Parties	Agri-Service Providers	Private sector actors providing machinery, inputs, and technical services.
	Regulators / Implementing Entities	Agriculture Department	Responsible for implementation of agricultural emission reduction interventions.
Cross-Cutting	Beneficiaries	Urban and Rural Communities	Population benefiting from improved air quality and reduced emissions.
	Broader Interested Parties	Civil Society / NGOs / Media	Entities engaged in awareness, advocacy, and monitoring of program outcomes.

3.3. Other interested parties

The Program stakeholders also include parties other than the directly affected parties. These are not directly affected, but they influence, support, regulate, or are interested in outcomes. An initial identification of individuals and groups who fall within this category is below in **Table 4**.

Table 4*:* List of Other Interested Parties

IA	Other Interested Parties relevant to respective IAs	Details
EPCCD	Research and academic institutions	▪ Universities and research centres working on air quality, emissions, and climate change. ▪ Technical experts supporting emissions inventory and modelling
	Civil society organizations	▪ NGOs working on environmental protection and public health. ▪ Advocacy groups on air pollution and climate change
	Media	▪ Print, electronic, and digital media reporting on environmental issues
	Development partners	▪ International organizations supporting air quality and climate initiatives
T&MD	Regulatory and policy bodies	▪ Provincial and national transport regulatory authorities ▪ Urban planning and traffic management agencies
	Private sector and industry	▪ E-bus manufacturers and suppliers • Charging infrastructure providers • Technology providers (ITS, ticketing systems)
	Financial and investment institutions	▪ Banks and financial institutions supporting EV financing. ▪ Investors in transport infrastructure
	Civil society and advocacy groups	▪ NGOs working on sustainable transport and urban mobility ▪ Road safety advocacy groups
	Media	▪ Media covering transport reforms and public service delivery
	Development partners	▪ International agencies supporting sustainable transport and EV transition
Agriculture Department	Research and extension institutions	▪ Agricultural universities and research institutes ▪ Extension service providers
	Agribusiness and private sector	▪ Suppliers of agricultural inputs and machinery. ▪ Companies providing alternative technologies
	Civil society organizations	▪ NGOs working on sustainable agriculture and rural development
	Financial institutions	▪ Banks and microfinance institutions supporting farmers
	Media	▪ Media covering agriculture and rural issues
	Development partners	▪ International organizations supporting climate-smart agriculture

3.4. Disadvantaged / vulnerable individuals or groups

Within the Program, the vulnerable or disadvantaged groups may include but are not limited to the following. Vulnerable groups within the communities affected by the Program will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the Program is provided in the following **Table 5** .

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Table 5*:* List of Disadvantaged/Vulnerable Individuals and Groups

Vulnerable Group	Barriers to Accessing Information or Program Benefits (PCAP-Specific)	Potential Representatives / Partners
Women (including women commuters and women EV users)	• Limited access to EV financing due to lack of collateral or bank requirements. • Exposure to SEA/SH risks in public transport systems. • Mobility constraints due to safety concerns. • Limited access to digital/online information on subsidies and transport services. • Underrepresentation in transport decision-making.	Women Development Department, women-led CSOs, local women's rights organizations, community nobels, educational institutions
Persons with Disabilities (PWDs)	• Inaccessible transport infrastructure and VICS centers. • Lack of accessible information on EV schemes and subsidies. • Digital exclusion in online application systems. • Limited tailored financial products. • Mobility constraints in public transport systems.	DPOs, Social Welfare & Bait-ul-Maal Department, disability-focused NGOs
Students (potential EV 2-wheeler users)	• Limited access to EV financing due to banking requirements. • Lack of awareness of subsidy schemes. • Digital literacy gaps in applying for EV programs. • Affordability constraints.	Universities, colleges, student unions, education departments
Low-Income Individuals (vehicle owners & riders)	• High upfront cost of EVs. • Exclusion from formal EV financing systems. • Limited awareness of buyback/subsidy programs. • Digital divide restricting access to online registration platform. • Dependence on informal transport options.	Community organizations, local NGOs, union councils, community centers
Informal Transport Operators (rickshaw, taxi, loaders)	• Risk of income loss due to vehicle scrappage/emission enforcement. • Limited access to EV financing and replacement vehicles. • Lack of awareness of transition support programs. • Weak inclusion in formal transport planning systems.	Transport unions, informal worker associations, local NGOs
Mechanics & Workshop Workers (including EV transition value chain)	• Loss of livelihoods due to shift from ICE vehicles to EVs. • Limited access to reskilling/training programs in EV maintenance.	Technical training institutes, labor unions, industry associations

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Vulnerable Group	Barriers to Accessing Information or Program Benefits (PCAP-Specific)	Potential Representatives / Partners
	• Exclusion from formal EV service economy.	
Informal Laborers in Transport & Recycling Chains	• Job insecurity due to regulatory enforcement on emissions and waste handling. • Lack of transition support into formal EV/battery value chains. • Limited awareness of alternative livelihood programs.	Labor unions, CSOs, urban poor support NGOs
Women in Informal Recycling/Value Chains	• Exposure to unsafe battery handling practices. • Lack of access to formal EV/battery recycling value chains. • Exclusion from training and financial inclusion programs. • Low bargaining power in informal markets.	Women CSOs, environmental NGOs, recycling associations
Battery Waste Handlers / Recycling Workers	• Health and safety risks from improper battery handling. • Lack of formalization in EV battery recycling systems. • Limited access to training and PPEs. • Exclusion from regulatory compliance support programs.	Environmental protection agencies, recycling companies, labor safety NGOs
Elderly Commuters	• Physical inaccessibility of buses and stations. • Lack of low-floor or assisted transport services. • Digital exclusion from EV/transport service information platforms.	Transport authorities, social welfare departments
Rural Tenant Farmers	• Limited access to Super Seeder financing and rental schemes. • Weak outreach and awareness of clean agriculture programs. • Digital and literacy barriers in subsidy application systems.	Agriculture Department, local extension services, farmer organizations
Transgender Persons (transport users and informal workers)	• Social exclusion and discrimination in transport access. • Safety risks in public transport; barriers to accessing formal EV-related employment opportunities. • Limited grievance reporting access.	Human rights organizations, CSOs, social welfare departments
Religious, Ethnic, Gender Minorities	• Social exclusion in transport and service access. • Language barriers in program information; limited participation in consultations. • Digital exclusion from online service platforms.	Community-based organizations, NGOs, CSOs

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Vulnerable Group	Barriers to Accessing Information or Program Benefits (PCAP-Specific)	Potential Representatives / Partners
Commercial Operators Using Polluting Vehicles	• Financial burden of compliance and vehicle transition. • Limited access to formal credit for EV transition. • Potential income disruption due to enforcement actions.	Transport associations, chambers of commerce
Industrial Workers in Polluting Units	• Employment insecurity due to emission control enforcement. • Limited reskilling opportunities; exposure to workplace pollution.	Labor departments, trade unions, industry associations

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4. Stakeholder Engagement Program

4.1. Summary of stakeholder engagement done during Program preparation

Cconsultations with relevant institutions, Program affected peoples, experts, and beneficiaries are essential in the proper planning and preparation of development Program and programs, to ensure effective identification and assessment of environmental and social effects, and to recommend measures to improve environmental and social management capacity. Initial stakeholder consultations were conducted during ESSA preparation, The workshop was attended by 35 stakeholders from government institutions, academia, the private sector, civil society organizations, and sector experts, as shown below. The consultation provided valuable input on Program design, environmental and social risks, citizen engagement, air quality management, and accessibility considerations. detailed list of participants is provided in ***Annex 1***.

Additional consultations will continue throughout Program implementation, and their findings will be incorporated into Program activities and decision-making. Additional stakeholder engagement activities will be undertaken during Program implementation to ensure the participation of affected parties, beneficiaries, vulnerable groups, transport users, women, persons with disabilities, farmer groups, private sector stakeholders, workers, and communities potentially affected by Program-supported investments and studies.

- **Government Departments**: Planning & Development Board, Transport & Masstransit Department, Agriculture Department, Environmental Protection and Climate Change Department, Energy Department, Industries Department, Punjab Energy Efficiency and Conservation Agency, Special Education Department, Social Welfare & Bait-ul-Mall Department, Lahore Development Authority, Punjab Small Industries Corporation.
- **E&S Specialists from World Bank Financed Programs:** PIUs staff from the Punjab Green Development Program (PGDP), Punjab Cities Program (PCP), Punjab Affordable Housing Program (PAHP), Punjab Resilient and Inclusive Agriculture Transformation Project (PRIAT)
- **Civil Society & NGOs:** WWF Pakistan, Pakistan Air Quality Initiative (PAQI).
- **Private Sector:** Pakistan Agricultural Machinery and Implements Manufacturers (PAMIMA), Dawood Agro Company (progressive rice farmer)
- **Academia:** Lahore University of Management Sciences (LUMS)

Major points raised by the participants can be summarized as follows:

- **Feedback on Program Design**: CSOs and NGO representatives highlighted that the expansion of air quality monitoring stations must be scientifically planned to ensure comprehensive coverage and real-time public access. Multiple stakeholders including government, academia, NGOs and private sector are conducting AQM activities, but are working in silos. Bringing them to one platform is essential. Institutional strengthening of the EPCCD and technical capacity building is essential for effective AQM and monitoring. Private sector representatives in agriculture emphasized that super seeders should be provided in targeted areas / hot spots for crop burning such as Gujranwala Division and Lahore Division which grow 50% of the rice crop of Punjab. This will ensure maximum positive impact to air quality. To encourage production of agricultural machinery to combat crop burning, the program may also consider providing incentives to machinery manufacturers.
- **Stakeholder Engagement:** Feedback received from CSOs and government largely focused on ensuring transparency and accountability of the Program through citizens' engagement and monitoring. Ensuring that air quality data is real-time accessible and actionable for both policymakers and the public is crucial for behavioral change.
- **Inclusion of Vulnerable Groups:** Government stakeholders from EPCCD and the Social Welfare Department stressed on the importance of ensuring the public transport infrastructure is accessible for disabled persons and the relevant government legislations on ensuring access of public facilities to vulnerable groups are implemented under PCAP activities.

Besides the aforementioned formal workshop regular consultation meetings have been conducted between various departments and PCAP CMU. Separate formal meetings were also held with Senior Minister, Punjab and Minister for Transport & Masstransit Department to apprise them about the Program design and seek their guidance to further improve it.

While the stakeholder consultation undertaken during ESSA preparation provided valuable input from government institutions, civil society organizations, academia, and sector experts, additional targeted consultations with vulnerable and potentially affected stakeholder groups including women, persons with disabilities, transport users, informal workers, farmer groups, and communities associated with Program-supported activities will be undertaken during Program implementation.

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Disclosure Mechanism and Accessibility of P-SEP

The P-SEP will be publicly disclosed through the official PCAP and relevant IAs websites to ensure broad accessibility. Key information will also be shared in Urdu and English to reach diverse stakeholder groups, including vulnerable communities. In addition, simplified versions of key P-SEP messages will be disseminated through social media, community networks, and local government offices. This multi-channel approach will ensure transparency and inclusive access to information across all stakeholder groups.

4.2. Summary of Program Stakeholder ‘s Needs and Methods, Tools and Techniques for stakeholder engagement

The PCAP recognizes the importance of active and meaningful engagement with all relevant stakeholders to ensure the program's successful implementation, sustainability, and equitable outcomes. Effective stakeholder engagement is essential for building trust, addressing concerns, and fostering collaboration. The Stakeholder Engagement Plan below outlines the engagement process, methods, including sequencing, topics of consultations and target stakeholders. The strategy for stakeholder engagement will ensure that all relevant stakeholders, particularly disadvantaged and vulnerable groups, are meaningfully consulted throughout Program implementation. Feedback received through these consultations will be considered and, where relevant and feasible, incorporated into Program implementation arrangements, stakeholder engagement activities, and decision making processes to promote accessibility, inclusion, and sustainability.

. The World Bank and the Borrower do not tolerate reprisals and retaliation against Program stakeholders who share their views about Bank-financed Program. The following **Table 6** illustrate the summary of P-SEP.

Table 6*:* P-SEP Summary Table

Preparation Stage

Target Stakeholders	Topic of Consultation / Message	Method Used	Responsibilities	Frequency / Timeline
Government and institutional stakeholders	Presentation of program (PforR components), feedback on design, risks and implementation arrangements	Formal meetings; one-on-one interviews	PCAP-CMU	Completed (once during preparation)
Government, institutions, private sector, NGOs, CSOs (including vulnerable groups)	Overall program design (PforR and IPF), risks, inclusion and safeguard considerations	Consultative workshop	PCAP-CMU	Completed
Students, NGOs, CSOs, vulnerable groups	Program overview, inclusion feedback, accessibility concerns	Virtual consultative workshop	PCAP-CMU	Completed

Implementation Stage

Target Stakeholders	Topic of Consultation / Message	Method	Responsibilities	Frequency / Timeline
Transport departments (T&MD, PMA, PTC)	Transport studies, EV transition planning, operational risks	Formal meetings; interviews	Consultants / PIU-T&MD	Early-stage draft findings follow-up during implementation
E-bus operators, staff	Operational design and service delivery issues	Focus group discussions	Consultants	Early-stage and mid-implementation consultations
Vulnerable groups (PWDs, women, students), CSOs	Inclusion in transport and EV-related interventions	Workshops; FGDs	PIU-T&MD; Consultants	Early draft findings implementation feedback cycles
Urban communities and transport users	Service quality, accessibility, affordability	Consultative workshops	PIU-T&MD	Draft findings periodic feedback during implementation
Private sector (transport-related)	EV transition, business impacts, regulatory risks	Workshops; FGDs	PIU-T&MD	Early-stage draft findings consultations
Academia	Technical input on transport studies	Workshops	PIU-T&MD	Draft findings stage review workshops

Implementation stage: Sensitive Activity-Specific Engagement Measures

Target Stakeholders	Topic of Consultation / Message	Method	Responsibilities	Frequency / Timeline
Vehicle owners (private & commercial), informal operators	Vehicle inspection processes, scrappage/buyback schemes, compensation and transition support	FGD one-on-one consultations Helpline engagement	PIU-T&MD	Early design pre-implementation ongoing feedback during rollout

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Mechanics, workshops, informal transport workers	Livelihood impacts of EV transition and compliance enforcement	FGD stakeholder dialogues	PIU-T&MD	Early-stage mid-implementation follow-up
Industrial units, brick kiln owners, workers, communities	Industrial compliance measures, emissions enforcement impacts	Formal meetings; field consultations	EPCCD Consultants	Early design draft rules consultation implementation monitoring
Battery waste handlers, recyclers, informal sector workers	Battery waste management rules, enforcement, safety risks, livelihood transition	FGD one-on-one interviews	EPCCD PIU-T&MD	Early-stage draft findings enforcement implementation feedback
Environmental regulators, private sector, CSOs	Carbon credit systems and MRV frameworks	Workshops interviews	PCAP-CMU	Draft stage technical validation implementation follow-up

Additional stakeholder engagement activities will be undertaken throughout Program implementation to ensure the participation of affected parties, beneficiaries, vulnerable groups, transport users, women, persons with disabilities, farmer groups, private sector stakeholders, workers, and communities potentially affected by Program-supported activities, investments, studies, and regulatory measures.

Implementation stage: Cross-Cutting Program Communication & GRM

Target Stakeholders	Topic of Consultation / Message	Method	Responsibilities	Frequency / Timeline
General public and vulnerable groups	Program updates, GRM access, awareness	Website, social media, mass media, brochures (accessible formats)	PCAP-CMU	Ongoing
All stakeholders	Feedback and grievances	GRM channels, surveys	PCAP-CMU	Continuous

Post-Implementation Stage

Target Stakeholders	Topic of Consultation / Message	Method	Responsibilities	Frequency / Timeline
Government, private sector, academia, CSOs, vulnerable groups	Results dissemination and next steps	Launch events	PCAP-CMU	Once per sector
General public and vulnerable groups	Program outcomes and accountability reporting	Website, media, brochures	PCAP-CMU	Ongoing
Citizens and users	Satisfaction and feedback	Surveys (including transport satisfaction surveys)	PCAP-CMU	Annual

4.3. Proposed strategy to incorporate the views of vulnerable groups

The Program will seek the views of vulnerable groups such as women, disabled, low income households, rural communities, workers of impacted industries, and minorities through prioritized engagement. These groups will be reached through community meetings held in accessible locations and focused group discussions with gender and disability inclusivity. To ensure full participation, materials will be provided in local languages and in formats accessible to the illiterate or disabled. A safe space would be created for open dialogue, especially on sensitive issues. The Program will also leverage partnerships with local NGOs and CSOs that have experience working with these groups to facilitate meaningful engagement.

The Program will seek the view of vulnerable groups through the following methods:

- **Community meetings:** organizing meetings at the community level to facilitate direct interaction and feedback.
- **Focus Group Discussions***:* conducting discussions with smaller, targeted groups to delve deeper into specific issues and concerns.
- **Individual Interviews***:* Engaging in one-on-one interviews, particularly for those unable to attend group sessions.
- **Surveys:** Distributing written or digital surveys to gather a broader range of responses.
- **workshops***:* Hosting workshops that are physically and logistically accessible to all, including persons with disabilities.
- **Social Media and Online Platforms:** Utilizing digital platforms for engagement, especially beneficial for tech-savvy youth and those with limited mobility.

- **Collaboration with Local NGOs and CSOs:** Partnering with NGOs that have existing relationships with these groups to facilitate engagement.

The following measures will be taken in order to remove obstacles to full and enabling participation / access to information:

- **Provision of Information in Local Languages:** translating materials into local languages to ensure understanding.
- **Accessible Formats:** offering information in braille, large print, and audio formats for those with visual or hearing impairments, and pictorial guides and audio-based explanations for the illiterate. Additionally, ensuring the availability of printed signage and flyers for those without digital access.
- **Convenient and Accessible Venues:** choosing meeting locations that are easily reachable and accessible to persons with disabilities and women who may have limited mobility due to cultural norms.
- **Flexible Timing:** scheduling sessions at times suitable for participants, considering work and caregiving responsibilities.
- **Transportation Support:** arranging transportation for remote or mobility-challenged individuals.
- **Cultural Sensitivity Training for Facilitators***:* ensuring that those leading sessions are trained in cultural sensitivity and inclusivity
- **Female inclusion:** ensuring enough female staff is available to hold separate sessions for women.
- **Regular Updates, Feedback, and "You Said, We Did" Communication Mechanisms**

Multiple communication channels, including community notice boards in CMU, PIU, IAs offices, public meetings, social media platforms, departmental websites, local radio, and printed information materials, will be used to disseminate Program-related information and collect stakeholder feedback. The P-SEP will also adopt a "You Said, We Did" approach to ensure transparency and accountability by regularly communicating back to stakeholders how their feedback, concerns, and recommendations have been considered and addressed in Program planning and implementation. Summaries of consultation outcomes, actions taken, and follow-up measures will be shared with stakeholders in accessible and understandable formats,

5. Resources and Responsibilities for Implementing Stakeholder Engagement

5.1. Implementation Arrangements and Resources

The PCAP-CMU is in charge of ensuring stakeholder engagement activities are being carried out as per the P-SEP. The entities responsible for carrying out stakeholder engagement activities are the relevant government departments involved in the studies/assessments (T&MD, PSIC, EPCCD, etc.) and the consultants/firms hired to conduct the studies/assessments. The Social Safeguard & Gender Specialists within the PCAP-CMU and PIU, or E&S focal points in the relevant government departments will lead the stakeholder engagement activities, with the support of the consultants/firms where needed. The overall responsibility for P-SEP implementation lies with the Program Director, PCAP-CMU who will ensure integration with the Program's environmental and social management strategies. Stakeholder feedback and engagement outcomes will be systematically documented and reviewed to inform Program adjustments and decision-making.[1]

The stakeholder engagement activities will be documented through:

- Detailed records of all engagement activities, including minutes of meetings, attendance lists and feedback received.
- Regular reports summarizing the stakeholder feedback, concerns, and suggestions.
- Documentation of how stakeholder input has been incorporated into program planning and decision-making.
- Ongoing updates in program reports and communications to ensure transparency and accountability in stakeholder engagement.

The budget estimate for implementing P-SEP is **477,000 USD**. The budget breakdown can be found in **Annex 2**. A communication and outreach firm will be engaged to support the implementation of the P-SEP and broader communication activities. The firm will assist the CMU and IAs in planning and conducting stakeholder engagement activities, organizing consultations, workshops, focus group discussions, and awareness campaigns, and ensuring meaningful participation of affected parties, beneficiaries, and vulnerable groups, including women, persons with disabilities, transport users, workers, farmers, and local communities. The firm will support the preparation and dissemination of communication and consultation materials in accessible and user-friendly formats, maintain records of stakeholder engagement activities, document feedback received through consultations and outreach activities, and support the implementation of the Program's "You Said, We Did" approach. In addition,

[1] Integrate provisions for the mobilization of technical expertise for safe consultations with vulnerable groups, and/or on sensitive topics, as and when needed.

the firm will assist in public awareness campaigns related to air quality, cleaner mobility, environmental compliance, and other Program interventions; support citizen and beneficiary feedback collection; facilitate disclosure of Program information through multiple communication channels; and contribute to periodic reporting on stakeholder engagement activities and SEP implementation progress.

6. Grievance Mechanism

A Grievance Mechanism is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of Program-affected parties related to the environmental and social performance of a Program to be submitted and responded to in a timely manner.

6.1. Description of Grievance Mechanism (GM)

A robust grievance mechanism is an essential part of the PCAP to address concerns or complaints raised by stakeholders during the Program's implementation. The mechanism ensures that stakeholders have a clear, accessible way to voice their concerns and that these are resolved in a timely and fair manner. The approved/cleared grievance mechanism for the PCAP includes the following elements as described in **Table 7**:

Table 7*: Illustrative Table on the GM Steps*

Step	Description of process	Timeframe	Responsibility
GM implementation structure	Existing GMs are available at the provincial and department that may be used by the public to submit grievances. These include the Punjab Portal, Provincial Ombudsman, and separate mechanisms for each of the IAs. A detailed analysis of these GMs is provided in the PCAP ESSA and details are provided as ***Annex 4***. A GM implementation structure to adequately address and monitor all PCAP related grievances has been established as follows: The Grievance Redress Committee has been formed at the PCAP-CMU, including the PCAP-CMU Program Director, PCAP Focal Points for IAs, Social & Gender Specialist of CMU/GRO, Social & Gender Focal Points from IAs and co-opted members from relevant government departments as required ***Annex 5***. The Social & Gender Specialist at the PCAP-CMU is responsible for overall operation of the GM and is the Grievance Redressal Officer (GRO) of the program.	Ongoing	PCAP-CMU, PIU and IAs

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Step	Description of process	Timeframe	Responsibility
	A sub GRC has been formed at T&MD. Social & Gender Specialist at T&MD PIU will be responsible for operation of the GM at PIU level.		
Grievance uptake	Grievances can be submitted via the following existing channels. In addition to these, the PCAP-CMU may set up additional channels to receive grievances. • **Telephone hotline:** Provincial 0800 02345 EPCCD 1373 PMA 1762 PTC 111-582-111 Agriculture 0800-15000 and 0800-29000 • **WhatsApp** EPCCD 0335-9232227 T&MD 0321-0980980 • **E-mail** EPCCD ddisepa@punjab.gov.pk PTC complaints@ptc.gop.pk • **E-Portal** Provincial: www.punjab.gov.pk Ombudsman: https://ombudsmanpunjab.gov.pk/register-complaint-residential-pakistanis) • **SMS** Agriculture 0304-4000172 • In-person at the physical offices of IAs • Grievance or suggestion boxes located at PCMU and PIU • Social media of PCAP and IAs • Tablet/smartphone application – Go Punjab App • Online form on the PCAP • Call on 042-34556625 CMU-PCAP • Call on 042-99231547 PIU-PCAP (T&MD) • or P&D website.	Ongoing	PCAP-CMU, PIU and IAs
Sorting, processing	Any complaint received will be forwarded to the PCAP-CMU GRO and logged in a centralized database, with a unique reference number assigned to each complaint. This will allow for tracking and transparency throughout the resolution process. Grievances are then categorized and referred to the relevant GFP or GRC for resolution. Grievances will be categorized into the following complaint types: Low; Medium; and High priority.	Upon receipt of complaint	PCAP-CMU GRO

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Step	Description of process	Timeframe	Responsibility
	Low priority: these typically involve minor issues that do not significantly impact the overall program or the complainants' well-being. Examples could include minor administrative errors, delays in non-critical services, or small-scale individual grievances that can be resolved locally, with the GFP, without extensive intervention. Medium priority: these are more serious than low priority complaints but do not pose immediate or significant risks to the program's success or stakeholders' rights and interests. These might include disputes over employment terms, moderate environmental or social impacts, or concerns about program implementation aspects that affect a limited number of stakeholders. High priority: these are critical issues that require urgent attention and could significantly impact the program's success and the well-being of stakeholders. Examples could include violation of the law of the land, corruption, GBV, SEA/SH (sexual exploitation, abuse and harassment), community rights, significant health and safety concerns, allegations of serious environmental or social harm; complaints regarding minorities, differently abled persons, transgender etc.		
Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant via acknowledgement in writing (through letter, email, whatsApp etc.). Depending on accessibility, the GRO may instruct the relevant GFP to convey acknowledgement	Within 7 days of receipt	GRO or GFPs
Verification, investigation, action	Low and medium priority grievances may be investigated and resolved directly by the GFP at the IAs or the sub-GRC, in consultation with the GRO. If the grievance is unable to be resolved, its priority is upgraded to high priority. High priority grievances are investigated and resolved by the PCAP-CMU GRC. The GRC may enlist PIU sub-GRC, and GFPs to assist in verification and identification.	Within 10 working days for low and medium; specific timeframe for high priority set by PCAP-CMU GRC	Grievance Focal Persons, PCAP-CMU GRC, PIU sub-GRC

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Step	Description of process	Timeframe	Responsibility
	For all levels of grievance, the proposed resolution is formulated by the overseeing entity (varying depending on the grievance priority), and the resolution is communicated to the complainant by the GRC/GFP where the complaint was first received.		
Monitoring and evaluation	Data on complaints are collected in a dedicated grievance management system at the PCAP-CMU GRC. Grievance data is reported to the World Bank on a Bi-annual basis	Bi-annual reporting	PCAP-CMU GRO
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected through follow-up survey or interview call after the resolution process.	Post-resolution	PCAP-CMU GRO
Training	One GRM training has been done on 5th November 2025 to the PCAP-CMU, PIU, las staff, while the GRM session for the consultant firms will be done once they will be on board. Regular capacity-building workshops and on-the-job training programs, focusing on grievance redress mechanisms, social engagement and environmental compliance will be done accordingly.	At the start of the program and subsequently as needed	PCAP-CMU
Appeals process	The GM also include a system for appeals. If a complainant is unsatisfied with the resolution of the grievance, they will be able to lodge an appeal, which can be escalated to the Secretary, P&D.	Within 14 days of appeal	PCAP-CMU

A GM accessible for Program labor has been prepared and it is a part of the Labor Management Procedures (cleared/Approved by the bank for PCAP) in line with the requirements set out in Core Principle 3 as per ESSA and ESCP, has been disclosed on PCAP's website. It will address labor or workplace-related concerns and SEA/SH consistent with the applicable national and provincial laws and Core Principle 3. This is a two tier GRM and is linked with the Program's GRM.

6.2. Appeals Process and Confidentiality

Appeals process:

The GM includes a structured appeals process to ensure fairness and transparency. If a complainant is not satisfied with the resolution of their grievance, they may submit an appeal within 14 days of receiving the decision. The appeal will be reviewed at a higher administrative level and may be escalated to the Secretary, Planning & Development (P&D) Department for further review. This escalation constitutes an administrative review within the Program GM framework and is not intended to replace or limit any legal or judicial remedies available to the complainant under applicable laws. Complainants retain the right to

pursue external administrative or judicial avenues at any stage of the grievance process. Responsibility: PCAP-CMU.

Confidentiality and Data Protection

The Project shall ensure strict confidentiality of complainant identity and grievance details throughout the grievance management process. Personally identifiable information shall be collected only where necessary, stored securely with restricted access, and shared only with authorized personnel on a strict need-to-know basis. Anonymous complaints shall be accepted where feasible and addressed to the extent possible. No grievance information shall be disclosed to third parties without informed consent unless required by law.

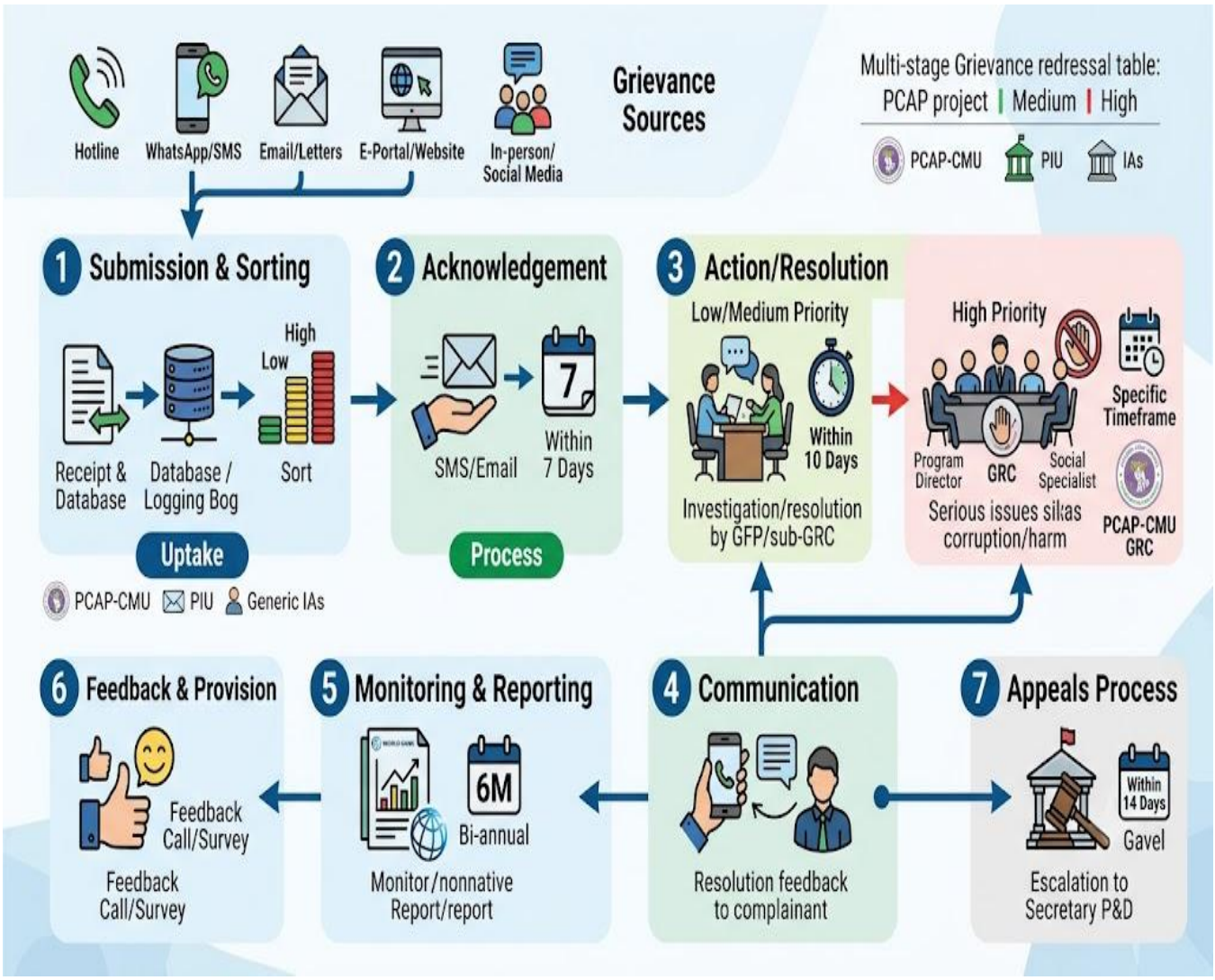
For complaints related to Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH), the Program shall apply a survivor-centered approach and ensure heightened confidentiality safeguards. The grievance mechanism shall limit information collection to only what is strictly necessary for safe referral and basic case categorization. It shall not request or record unnecessary personal or incident details and shall, to the extent possible, restrict intake to the following:

- A description of the incident in the complainant's own words, without probing or leading questions;
- Whether, to the best of the complainant's knowledge, the alleged perpetrator is associated with the project;
- If voluntarily provided, the age and sex of the survivor; and
- If known, whether the survivor has been referred to appropriate support services.

To address any complaints related to GBV/SEA/SH, the Program will ensure that GBV related grievances received by the GRM are referred to relevant GBV service providers. Dedicated trained female staff has been appointed to receive and process GBV related complaints. Special considerations will be taken to ensure that the complainant's identity is treated as privileged information, and the option to lodge the complaint anonymously will also be provided. Additionally, all GRM response teams will be trained on GBV, SEA and SH during the implementation of the Program as well. Detailed protocols for receiving, managing and addressing complaints related to GBV/SEA/SH has been developed in the GBV/SEA/SH Action Plan under the P for R component and added to the GRM..

Special considerations will be taken to ensure that the complainant's identity is treated as privileged and confidential information throughout the grievance handling process. The Program GM will allow the complaints to be submitted with or without provision of personal identification details, including CNIC, and will not make CNIC disclosure a mandatory requirement for lodging a grievance. Anonymous complaints will be accepted and processed to the extent possible, particularly in cases involving vulnerable individuals and for complaints related to Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH), where confidentiality and accessibility are critical. This approach ensures that fear of identification or procedural barriers does not prevent affected persons from accessing the grievance mechanism.

GRM Pathway



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7. Monitoring and Reporting

7.1. Summary of how SEP will be monitored and reported upon

The P-SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

P-SEP reporting will include the following:

(i) Progress reporting on the P-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)

(ii) Cumulative qualitative reporting on the feedback received during P-SEP activities, in particular (a) issues that have been raised that can be addressed through changes in program scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Systems Assessment, or SEA/SH Action Plan, if needed; (b) issues that have been raised and can be addressed during program implementation; (c) issues that have been raised that are beyond the scope of the Program and are better addressed through alternative Program, Programs or initiatives; and (d) issues that cannot be addressed by the Program due to technical, jurisdictional or excessive cost-associated reasons.

(iii) Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.

(iv) Quantitative reporting based on the indicators included in the P-SEP. An illustrative set of indicators for monitoring and reporting is included in ***Annex 3***.

7.2. Reporting back to stakeholder groups

The P-SEP will be revised and updated as necessary during Program implementation. Summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred.

To ensure transparency and accountability, the Program will actively communicate both consultation results and grievance trends to stakeholders through disclosure on PCAP website. Key feedback received during consultations, including stakeholder concerns, responses provided, and how inputs have been incorporated into Program design and implementation, will be summarized and shared in non-technical formats.

Similarly, grievance trends—such as the number and type of grievances received, key categories of issues raised, resolution timelines, and overall satisfaction with grievance handling—will be periodically analyzed and publicly disclosed in aggregated form, ensuring that no personal or sensitive information is revealed.

Specific mechanisms to report back to the stakeholders include the following:

- **Annual Reports**: An annual report will provide a comprehensive overview of Program progress, results of environmental and social monitoring, key findings from stakeholder consultations, and an analysis of grievance trends and the effectiveness of the grievance mechanism. This report will be made publicly available to ensure transparency and accountability.
    - **Transparency and Public Access**: Program data, including air quality measurements, consultation summaries, grievances and progress reports, will be made publicly available through the Program website and/or other accessible platforms. This will enable stakeholders to track Program performance, understand how their inputs have been addressed, and monitor responsiveness to grievances over time.

Annex 1: Details of Stakeholder Consultations

The consultations documented in this Annex represent stakeholder engagement activities undertaken during Program preparation, including disclosure of the draft ESSA. These consultations do not constitute the full scope of stakeholder engagement envisaged under this P-SEP. Additional consultations with affected parties, beneficiaries, vulnerable groups, workers, transport users, women, persons with disabilities, farmer groups, communities potentially affected by Program-supported activities, and other interested stakeholders will be conducted throughout Program implementation in accordance with the engagement approaches and timelines described in Section 4 of this P-SEP.

A stakeholder engagement workshop and disclosure sessions of the Draft ESSA was conducted on 30th January 2025 from 3-6pm at the Planning & Development Board AKS Auditorium. The agenda of the workshop, feedback received, and list of participants is provided below.

Agenda:

Time	Session	Responsibility/Presenter
3:00pm to 3:30pm	Arrival and registrations	P&D
3:30pm to 3:45pm	Welcome by P&D	Ahmad Rajwana Managing Director, PRMPU, P&D
3:45pm to 4:00pm	Introduction to PCAP and description of program activities – PforR and IPF	Shafick Hoossein Senior Environmental Specialist & TTL P-CAP World Bank
4:00pm to 4:30pm	Presentation on Draft ESSA Findings and Recommendations; and Stakeholder Engagement Plan	Mehrunisa Malik – Social Development Consultant World Bank Shafqat Khan – Environment Consultant World Bank
4:30pm to 5:15pm	Feedback from stakeholders	P&D and World Bank
5:15pm to 5:30pm	Closing Remarks	Ahmad Rajwana Managing Director, PRMPU, P&D
5:30pm	Refreshments	

Feedback from Participants

Comments/Questions	Responses
Pakistan Air Quality Initiative (PAQI) PAQI is a CSO conducting research and awareness activities on air pollution in Pakistan. Our work is data centric and scientific. We appreciate that PCAP is giving attention to an inclusive design and stakeholder engagement. We have a set of recommendations (separately available) for PCAP that include the following: • **Air Quality Monitoring & Data Transparency** – Expansion of monitoring stations must be	The recommendations from PAQI are appreciated and well received. Bringing all relevant stakeholders on board is important for PCAP and measures will be taken to ensure this during the program. This will also be ensured through the Stakeholder Engagement Plan.

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scientifically planned to ensure **comprehensive coverage** and **real-time public access**. • **Regulation of Industrial & Vehicular Emissions** – Punjab must establish **clear, enforceable limits on industrial and vehicular emissions** to reduce PM2.5 pollution effectively. • **Public Awareness & Stakeholder Engagement** – Ensuring that **air quality data is real-time accessible and actionable** for both policymakers and the public is crucial for behavioral change. • **Institutional Capacity for Air Quality Management** – The Environmental Protection & Climate Change Department (EPCCD) must be strengthened with **technical expertise, funding, and enforcement mechanisms**. PAQI stands ready to support the **Punjab Clean Air Program** by: • **Providing independent data analysis** to validate emissions inventories and air quality trends. • **Contributing to policy development** for air quality monitoring regulations. • **Designing and implementing community engagement programs** to enhance public awareness of air pollution risks.	
Social Specialist PGDP • The program has many environmental and social risks. How can it be categorized low risk? • Site selection of e-bus depots should be very carefully done to ensure minimal E&S impacts. • Learnings from E&S activities and performance of PGDP must be taken into consideration and built upon for PCAP. • Will the design of the program be inclusive for disabled persons? • Which World Bank ESF standards are applicable for PCAP? • It must be ensured that bus depots have separate toilets for women and disabled persons. • Must ensure that periodic TPV of ESSA is conducted.	All questions and comments were well noted and responded to by the PCAP-CMU team.
Progressive Farmer and CEO of Dawood Agro Company I am the pioneer of rice mechanization initiative of Pakistan. For success and maximum impacts to air quality of super seeders, the initiative should be concentrated in targeted areas / hot-spots such as Gujranwala Division	Comments are well noted. PCAP will focus on identified hot-spots for crop burning for maximum impact. Due to limited resources, transplanters are not supported by PCAP. However,

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and Lahore Division which grow 50% of the rice crop of Punjab. To include unskilled labor, PCAP should consider including rice transplanter machines. This will also benefit women. PCAP should provide incentives for e-bikes manufacturing as well, as e-2 and 3 wheelers have a very usage.	they are part of the medium and long term plan under a project with ADB.
DD Planning Social Welfare Dept • Disabilities Act provides clauses on accessibility of public transport for disabled persons. The implementation needs to be ensured. • Will disability inclusion provisions under PCAP be expanded to general transport as well? • There is no inclusion of disabled persons in the consultations, which is disappointing.	. Disability inclusion plan will be prepared under PCAP. However they will only apply to PCAP financed activities.
Chairman PAMIMA Govt of Punjab is supporting purchase of agricultural machinery by farmers on subsidized rates. Similarly solar systems are being provided to farmers. None of these benefits are extended to manufacturers of agricultural implements. Please consider this. Sales and income tax exemptions for manufacturers of super seeders may also be considered.	Comments are received and well noted. Solar units will be provided to SMEs under PCAP. Taxation is beyond the purview of PCAP.
WWF Pakistan Which department will prepare and implement the e-waste rules?	EPCCD is implementing SOPs of e-waste.
WWF Pakistan There is a lot of activity on AQM by the government, private sector and NGOs. But they are all working in silos. How do we bring all of them together and focus on the hot-spots that have been identified? E-buses – will there be a separate infrastructure for e-buses?	The SEP will include activities to bring together all stakeholders involved in AQM. PCAP may consider a platform or working group on this.

Participants List

Sr.#	Designation/ Department
1	Managing Director PRMPU
2	Social Development Consultant World Bank
3	Environmental Consultant- World Bank
4	Environmental Consultant World Bank
5	Manager environment and social safeguards, Energy Department
6	DD Social Safeguards PGDP

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7	Environmental Specialist Punjab Small Industries Co-operation (PSIC)
8	Environmental Specialist PMDFC
9	Consultant accounts PRMPU
10	Assistant Manager (Program)/ PEECA
11	Member (ID) - P&D
12	Assistant Director Special Education Department
13	DD(P), Social Welfare & Bait ul Maal Department
14	CEO Dawood Agro company-Progressive farmer
15	DGA(F)P, Agriculture Department
16	Manager, WWF Pakistan
17	Senior Officer-Sustainability and Climate Change WWF Pakistan
18	Director Environment LDA
19	Assistant Chief P&E cell, Agriculture Department
20	Director (planning) Field Wing of Agriculture Department
21	AD (AFD project)
22	Department of Economics (LUMS)
23	PO (Consultancy I) P&D
24	Director Industries Department
25	Communication Specialist Pakistan Air Quality Initiative (PAQI)
26	PO(ECA-IV), P&D
27	DS(Dev.), Transport Department
28	Assistant Manager/ PEECA
29	Chairman - Pakistan Agricultural Machinery and Implements Manufacturers (PAMIMA)
30	Founder - Pakistan Air Quality Initiative (PAQI)
31	Environment Specialist PRIAT, Agriculture Department
32	Environment Specialist PAHP
33	Online participant
34	Online participant

Annex 2: P-SEP Budget Table

Budget categories	Quantity	Unit costs (USD)	Times/ Years	Total costs (USD)	Remarks
1. Estimated Staff salaries* and related expenses					
1a. Communications Specialist	1	19,000	5	95,000	
1b. Travel costs for staff	1	5000	5	25,000	
2. Consultations/ Participatory Planning, Decision-Making Meetings					
2a. Stakeholder Workshops and community engagement activities	1	15,000	5	75,000	
2b. Launch Events for Study Findings	4	15,000	1	60,000	
3. Communication campaigns					
3a. Translation (local language), Posters flyers etc.	1	15,000	1	15,000	
3b. Media campaigns	1	10,000	5	50,000	
4. Trainings					
4a. SEP Training for IAs and Consultant Firms	2	5000	1	10,000	
5. Beneficiary surveys					
5a. Citizen Feedback Surveys	*1*	*20,000*	*5*	*100,000*	
6. Grievance Mechanism					
6a. Training of GM committees	1	2000	1	2000	
6c. GM communication materials	1	10,000	1	10,000	
6e. GM Information System (setting up or maintenance)	1	5000	5	25,000	
6f. SEA/SH protocols in GM	1	5000	1	5000	
6g. Other GM Logistical Costs	1	5000	1	5000	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				**477,000**	

*Note: Salary costs can be indicative

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Annex 3. Sample Table: Monitoring and Reporting on the SEP

Key Evaluation Question	Practical Evaluation Questions	Indicators	Data Collection / Sources
1. Accessibility and effectiveness of Grievance Mechanism (GM) Are Program-affected stakeholders able to easily raise grievances and are these managed effectively?	• Are grievances being received through PCAP GM channels (online, institutional, departmental, hotline)? • Are grievances being resolved within defined timelines? • Are SEA/SH complaints handled through confidential protocols?	• Number of grievances received through PCAP GM channels (disaggregated by sector: transport, environment, agriculture, institutional) • Percentage of grievances resolved within 14/30 days (as per GM SOP) • Percentage of grievances closed with documented resolution • Number of SEA/SH-related complaints received and referred through confidential referral pathways	• GM database. • CMU Biannual GM reports. • Departmental grievance logs. • SEA/SH referral records (confidential, aggregated)
2. Responsiveness and quality of grievance handling	• How effectively are grievances addressed and closed? • Are complainants satisfied with resolution outcomes?	• Percentage of complainants reporting satisfaction with resolution (where feedback is provided voluntarily). • Average grievance resolution time (days) • Percentage of grievances requiring escalation to higher administrative levels	• GM database. • Follow-up feedback calls/surveys (where applicable) • CMU monitoring reports
3. Stakeholder engagement coverage and inclusiveness	• Are consultations conducted across key PCAP sectors and institutions? • Are vulnerable groups (women, PWDs, transport users) adequately included?	• Number of stakeholder consultations conducted by sector (transport, environment, agriculture, institutional reforms).	• Consultation attendance sheets • Consultation reports/minutes • CMU & PIU engagement records

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		• Percentage of consultations including women and persons with disabilities (PWDs) • Number of targeted engagement sessions with vulnerable or at-risk groups	
4. Effectiveness of stakeholder feedback integration	• Is stakeholder input influencing Program design and implementation? • Are consultation findings documented and acted upon?	• Number of program design or implementation adjustments made based on stakeholder feedback • Percentage of consultation reports documenting feedback-response-action linkage	• Consultation reports •CMU Biannual progress reports • Consultant reports
5. Awareness and outreach effectiveness	• Are stakeholders adequately informed about PCAP activities and GM mechanisms?	• Number of awareness/outreach campaigns conducted (urban, institutional, transport users). • Number of stakeholder information sessions held on GM and environmental/social aspects • Reach of awareness activities (estimated audience or digital engagement metrics)	• Outreach campaign records • Communication strategy reports • Social media/website analytics • CMU & PIU communication logs
6. Transparency and public disclosure performance	• Is Program information publicly accessible and regularly updated?	• Frequency of public disclosure updates (website/dashboard) • Number of consultation summaries and GM updates published • Timeliness of quarterly public reporting compliance	• Program website analytics • Biannual report
7. SEA/SH risk management and safeguarding compliance	• Are SEA/SH complaints handled confidentially and appropriately?	• Number of SEA/SH-sensitive complaints received and referred through survivor-centered pathways	• Confidential SEA/SH referral system records

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		• Percentage of SEA/SH cases handled within confidential protocol standards • Number of staff trained on SEA/SH-sensitive GM procedures	• Training attendance records

Annex 4. Existing Provincial and Departmental Grievance Mechanisms

Pakistan Citizen's Portal

The **Pakistan Citizen's Portal** (https://web.citizenportal.gov.pk/)is a government-operated mobile application designed to enhance public service delivery and facilitate efficient interaction between citizens and various government departments. Launched in **2018** under the vision of the **Prime Minister's Performance Delivery Unit (PMDU)**, the portal is a part of Pakistan's e-governance initiative to ensure transparency, accountability, and citizen participation in governance.

Through this application, citizens can lodge complaints about various issues, ranging from municipal services to governance inefficiencies, directly with the relevant authority. Categories include Environment and Climate change, Industries and Commerce, Transport and Vehicle Management, and Agriculture.

Government of Punjab Online Portal:

The Government of Punjab has a state-of-the-art online portal (www.punjab.gov.pk) with information on service delivery platforms, digital services, Annual Development Plan, tenders published by GoPb, administrative departments, investment schemes, public benefit schemes, laws and citizen rights amongst other information. The portal also lists helplines for various administrative departments. The Punjab Portal has a feature for citizen relationship management called the "Awaz e Khalq" that allows citizens to register specific complaints that may be associated with several departments such as DC office, Punjab police, Labor and Human resource, Environment protection and Healthcare to name a few.

In order to register a complaint, its mandatory to set up an account using your CNIC, district, home address and your personal phone number and email ID. Once an account is set up, a complaint form can be filled either in English or Urdu.

The "Citizen Corner" feature on the website (https://punjab.gov.pk/helplines) allows easy access to all forms of centers, platforms, mobile apps and even helplines that can cater to several citizen complaints or queries in an efficient manner. The options that are shown take into consideration people belonging to all socio-economic classes. The citizens who do not have access to android phones can easily lodge their complaints through several different helpline numbers listed in accordance with their departments such as the Chief Ministers complaint center number which is 0800-02345 and the Punjab Health Line 0800-99000.

On October 15th, 2022, the Chief Minister inaugurated the "Go Punjab" app, which is one of the many mobile applications that exist on the Punjab portal. The Go Punjab app provides citizens with easy access to a plethora of public services. A few of these services are Issuance of domicile certificates; birth, death, and marriage certificates; payment of utility bills; and health services. Another interesting feature it has is that it directly takes you to a Whatsapp chat with the Department of Transport and Mass Transit, assisting in any complaints or queries that may exist towards the department. The app also has a user-friendly interface, and it also contains a grievance redress mechanism allowing citizens to lodge complaints efficiently and with ease. The application itself is a significant step towards e-governance and improving the quality of public administration in the province. Other than the "Go Punjab" application, the portal has links to 44 different mobile applications that can be used for various departments that cater to citizen services, education, women safety, etc.

Official Use Only

To ensure that there is complete transparency, the portal also gives access to the Annual budget, Punjab Laws, PC-1's, Tenders and the Punjab Growth strategy 2023. Along with that, several statistics, be it population or economic statists are also present on the Portal.

Green Punjab App

The Punjab Government has launched a Green Punjab smartphone application to resolve smog-related concerns from citizens. Citizens can now file complaints against individuals who burn hospital waste and garbage, operate smoke-emitting kilns and vehicles, and factories that run without smoke control devices. Complaints submitted through the app will be swiftly reported to the appropriate authorities, and urgent action will be taken to resolve them. Complainants will also be kept up to date on the status of their complaints. Among the institutions linked to the app are PDMA, metropolitan corporation, traffic police, Parks and Horticulture Authority, and departments of agriculture, transportation.

The app also contains the SMOG complaint helpline, 1373 along with AQI reports generated in real time and the AQI wind Direction. Along with that it has a RASTA feature that helps in route planning and traffic advisory (https://punjab.gov.pk/node/6322).

Provincial Ombudsman of Punjab

The Ombudsman institution was first set up at the federal level in the year 1983 which later got established in Punjab first on a provincial level in the year 1997, making it a front runner at protecting citizens' rights and ensuring administrative accountability and good governance. The law essentially empowers the Ombudsman Punjab to consider complaints against any department, commission or even statutory co-operations that are established by the Provincial government, without including the High court. The Ombudsman has similar powers as are vested in a civil court under the Code of Civil procedure for summoning and enforcing the attendance of any person, compelling the production of documents, receiving evidence on affidavits, and issuing commission for examination of witnesses.

Any person who is aggrieved of mal-administration of any provincial government agency excluding courts and provincial assembly, can make a complaint on plain paper or online through their E-complaint portal (https://ombudsmanpunjab.gov.pk/register-complaint-residential-pakistanis) either in Urdu or English and can lodge the same in the Ombudsman Office either in person or through other means of communication. Figure 4 shows a detailed flow chart on how the complaint management process takes place. Every complaint must be accompanied by a copy of computerized National Identity Card (CNIC) of the complainant and supported by an affidavit to the effect that:

- The allegations are true and correct to the best of his/her knowledge and belief.
- Previously no complaint about the subject matter has been lodged.
- No suit, appeal, petition or any other judicial proceedings in connection with the subject matter of the complaint are pending before any court or judicial Tribunal.
- The complaint must bear the signature or thumb impression of the complainant and complete mailing address with Telephone or cell phone number if any. No anonymous or pseudonymous complaint is admissible.
- Alongside this, no complaint which is late than six months from the day on which the aggrieved person had the knowledge of the matter alleged in the complaint will be entertained unless special circumstances exist necessitating investigation in a complaint which is time barred.

- Findings in every complaint will be communicated to the complainant and the Agency on conclusion of the investigation and any person or agency aggrieved by an order of the Ombudsman, may make representation to the Governor within thirty days of the order.

Transport and Masstransit Department

Transport & Masstransit Department: For any complaints regarding the Department, the Punjab Transport and Mass Transit website (https://transport.punjab.gov.pk/complaints) has a section for complaints listing two complaints helplines regarding Route Permits and Fare Overcharging: 042-99200484 and 042-99200329. The department can also be contacted through Whatsapp: 03210980980.

Punjab Masstransit Authority: Helpline numbers for the metro bus systems in Lahore, Multan and Rawalpindi are provided at their website https://pma.punjab.gov.pk/. The helpline number for Lahore is (042-111-222-627) and may be used to lodge complaints. A helpline number 1762 is also available for quick dialing and is displayed in public transport operated by PMA.

Punjab Transport Company: PTC has established a dedicated commuter support center for the assistance of commuters regarding public transport operations, transport cards and other queries related to fares and routes in Lahore. Any complaints / suggestions / general inquiries regarding public transport operations and transport cards can be addressed through their helpline **(111-582-111)**. Public feedback is also accepted through email on complaints@ptc.gop.pk and through their public feedback page (https://ptc.punjab.gov.pk/commuter_support_center)

Environmental Protection and Climate Change Department (EPCCD)

The EPCCD has established a website that gives access to air quality reports that are generated daily and are open to citizens to get an idea of the current Air Quality that exists in their district. This allows transparency and access to important environmental challenges that exist, to which the citizens should remain aware of at all times to safeguard Public Health (https://epd.punjab.gov.pk/aqi).

EPCCD has a Right to Information tab on their website which provides details for complaint management (https://epd.punjab.gov.pk/right_to_information). EPA Punjab considers that for the enlightenment of citizens to hold public officers / officials accountable is their legal and ethical right. To maintain transparency, EPA Punjab has provided contact details of the Chief Information Officer which is 042-99231886 and the Public Information Officer 042-99231818. Citizens can also submit complaints directly to the office of Deputy Director Information and services EPA Punjab Lahore, by emailing on (ddisepa@punjab.gov.pk) or through the dedicated WhatsApp number 0335-9232227. The EPCCD also has a helpline number 1373 for public queries and complaints.

The EPCCD has also established a Complaint Cell under the administration section for the timely redressal of grievances received through various national and provincial complaint portals.

The Punjab Green Development Program (PGDP) also has a grievance redressal mechanism that resolves public grievances through the filing of complaints on environmental and social issues only related to the Punjab Green Development Program. To register a complaint, citizens would need to have

their CNIC number and a mobile number. The GRM details are provided at their website http://idm.pgdp.pk:8081/.

Planning and Development Board:

The website of P&D has an RTI tab with details for the Chief Public Information Officer who can be contacted for information or complaints. P&D Program financed by multi-lateral organizations have their own functioning GRMs. Complaints related to P&D may also be lodged through the provincial GRM channels.

Agriculture Department

To resolve emergent problems of farmers, toll-free Punjab Agriculture Helpline 0800-15000 and 0800-29000 have been installed / activated in the Directorate, which remain active 12 hours daily from 08:00 a.m. to 08:00 p.m. The facility for computerized recording of calls of farmer and display of callers ID with date and time at the helpline facilitates in locating callers for prompt feedback by technical experts on the same day. This facility has proved instrumental in improving knowledge and capacity building of farmers with enhanced confidence in Agriculture Department. The farmers are making best use of this helpline facility for seeking technical guidance about modern farm technologies as presently more than 12,000 telephone calls are being received / recorded annually to whom response / feedback from this Directorate is extended on the same day. Details are provided at their website https://www.agripunjab.gov.pk/directory.

Directorate of Agricultural Information, Punjab has also initiated SMS Helpline Service to extend technical guidance to the farmers using mobile phones. Farmers may send SMS at 0304-4000172 from any cellular network for seeking information and guidance to resolve their field problems. This initiative has further supplemented agricultural technology transfer efforts of the Directorate and farmers are becoming aware as how to benefit from scientific advancements, Government initiatives and facilities under development Programs. Details are provided at https://www.agripunjab.gov.pk/node/690.

The extensive field network of the Department's Agriculture Extension Wing provides farmers with access to department staff for information, guidance, complaints and services.

Linkage of Existing Provincial/Departmental Mechanisms with the PCAP Grievance Mechanism

The above-described provincial and departmental grievance redress systems constitute the primary entry points available to citizens for raising complaints in PCAP, these systems will not operate in isolation but will be formally integrated into the Program's overall Grievance Mechanism (GM) framework to ensure consistency, traceability, and effective resolution of grievances related to Program activities.

Interface with the PCAP GM

The PCAP GM will function as an umbrella coordination and tracking system, while existing platforms (e.g., Pakistan Citizen's Portal, Punjab Portal, departmental helplines, Ombudsman, and sector-specific apps such as Green Punjab App) will serve as frontline intake channels. Complaints relevant to PCAP interventions (e.g., air quality monitoring, transport emissions, fuel quality testing, and environmental enforcement) may be lodged through any of these systems.

All such complaints will be systematically identified and tagged as PCAP-related at the receiving level by the relevant department focal points or designated GM focal persons.

Summary

In summary, existing provincial and departmental grievance mechanisms form the operational backbone of citizen engagement under PCAP. The Program GM provides the integrating, monitoring, and accountability layer, ensuring that all grievances regardless of entry point are systematically recorded, tracked, escalated where necessary, and resolved in a timely and transparent manner.