Environmental Monitoring Report

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Pakistan: Balakot Hydropower Development Project

Prepared by the Project Implementation Unit of the Pakhtunkhwa Energy Development Organization, for the Islamic Republic of Pakistan and the Asian Development Bank (ADB).

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ABBREVIATIONS

ADB Asian Development Bank

AIIB Asian Infrastructure Investment Bank

AQMS Air Quality Monitoring System

CO carbon monoxide

dB decibel

DFO Divisional Forest Officer EE Environment Expert

EEM External Environmental Monitor
EIA Environmental Impact Assessment

EPC engineering, procurement and construction

HPP hydro power project

HSE health, safety and environment

IRRE Institute for Research on River Ecology

km kilometer

KP Khyber Pakhtunkhwa

MW megawatt

NEQS National Environmental Quality Standards

NOC No Objection Certificate

OHS occupational health and safety

PD Project Director

PEDO Pakhtunkhwa Energy Development Organization

PIU Project Implementation Unit

PM particulate matter

PMC Project Management Consultant

SAEMR Semi-Annual Environmental Monitoring Report

SDFO Sub-Divisional Forest Officer

SO₂ sulphur dioxide

SSEMP Site-Specific Environmental Management Plan

WHO World Health Organization

Abbreviations

TABLE OF CONTENTS

1	INTRODUCTION	1
1.1	Preamble	
1.2	Headline Information	
1.2	Tieauille Illioittiation	
2	PROJECT DESCRIPTION AND CURRENT ACTIVITIES	2
_ 2.1	Project Description	
2.2	Project Contracts and Management	10
2.2.1	Project Implementation Arrangements	
2.2.2	Project HSE Safeguard Team	15
2.3	Project Activities during Current Reporting Period	15
2.4	Material Resource Utilization	
2.5	Description of Any Changes to the Project Design	23
2.6	Description of Any Changes to the Agreed Construction Methods	24
0	ENVIRONMENTAL CAFFOLIARR ACTIVITIES	0.4
3	ENVIRONMENTAL SAFEGUARD ACTIVITIES	
3.1	General Description of Environmental Safeguard Activities	24
3.1.1	HSE Progress Review Meetings	
3.1.2	Due Diligence of Muck Disposal Sites and Batching Plant	25
3.1.3	Biodiversity Action Plan	26
3.1.4	Establishment of Fish Hatchery	
3.1.5	Annual OHS Training	
3.1.6	Meetings with ADB/AIIB Safeguards Team	
3.1.7	Instrumental Environmental Monitoring	
3.2	Site Audit	
3.3	Issues Tracking Based on Non-conformance Notices	
3.4	Trends	
3.5	Unanticipated Environmental Impacts or Risks	36
4	STATUS OF COMPLIANCE WITH COVENANTS	37
_	DECLUTO OF ENVIRONMENTAL MONUTORING	4.0
5	RESULTS OF ENVIRONMENTAL MONITORING	
5.1	Overview of Monitoring Conducted during the Current Period	40
5.2	Instrumental Environmental Monitoring	
5.3	Monitoring of Air, Noise, Water and Soil analysis	43
5.3.1	Ambient Air Monitoring	43
5.3.2	Noise Monitoring	47
5.3.3	Water Monitoring	
5.3.4	Soil Analysis	
5.3.5	Trends	
5.3.6	Summary of Monitoring Outcomes	
5.4	Waste Management	
5.5	Health and Safety	
5.5.1	Community Health and Safety	
5.5.2	Workers Health and Safety	58
5.6	Implementation Status of Environmental Management Plan	
5.7	Trainings	
5.8	Complaints	
	•	
6	FUNCTIONING OF THE SSEMP	95
6.1	SSEMP Review	
0.1	SSEIVIF Review	95
7	GOOD PRACTICE AND OPPORTUNITY FOR IMPROVEMENT	
7.1	Good Practice	
7.2	Opportunities for Improvement	
	-11 ·····	
8	SUMMARY AND RECOMMENDATIONS	07
8.1		
	Summary	
8.2	Recommendations	100

TABLES

Table 2.1: Brief Salient Features	
Table 2.2: Project Implementation Arrangement	10
Table 2.3: PIU Staff Deployed During the Reporting Period	11
Table 2.4: PMC Procurement Milestones	
Table 2.5: PMC's Personnel Deployed to the Project	12
Table 2.6: EPC Contract Procurement Milestones	
Table 2.7: EPC Contractor's HSE Team	
Table 2.8: Details of HSE Personnel	
Table 2.9: Summary of Overall Progress of EPC Contract till End of the Reporting Period	
Table 2.10: Component-wise Summary of Progress till End of the Reporting Period	
· · · · · · · · · · · · · · · · · · ·	
Table 2.11: Manpower Deployed to the Project during Reporting Period	
Table 2.12: Machinery Deployed to Project during the Reporting Period	
Table 2.13: Month-wise and Cumulative Details of Construction Materials	
Table 2.14: Month-wise and Cumulative Details of POL and Water Used (in Liter)	
Table 3.1: Site Audit Conducted during the Reporting Period	
Table 3.2: EEM's Observations and their Rectification/Accomplishment Status	
Table 3.3: Tracking of Non-Compliances for the Current and Previous Reporting Periods	36
Table 4.1: Compliance Status with Environmental Covenants	37
Table 5.1: Instrumental Environmental Monitoring Plan	42
Table 5.2: Ambient Noise Monitoring Results in Quarter 3 and Quarter 4 2023	48
Table 5.3: Drinking Water Monitoring Results in 2023	
Table 5.4: Surface Water Results of the Kunhar River in 2023	
Table 5.5: Soil Analysis Results in 2023	
Table 5.6: Solid and Lubricant Waste Generated at Camps and Sites	
Table 5.7: Medical Waste and Sorbents Generated at Camps and Sites	
Table 5.8: Patient Records for the Current Reporting Period	
Table 5.9: Implementation Status of EMP (Pre-construction and Construction Phases)	
Table 5.9. Implementation Status of EMF (Fre-construction and Construction Friases)	
, , , , , , , , , , , , , , , , , , ,	
Table 8.1: Implementation Status of Corrective Action(s) Proposed in the Previous SAEMR	
Table 8.2: Corrective Action Plan against issues identified during the Previous and Current Monitoring	-
Periods	. 100
FIGURES	
HOURES	
Figure 2.1: Project Location in Pakistan	5
Figure 2.2: Project Location in District Mansehra	
Figure 2.3: Project Layout Map7	6
uu	6
	7
Figure 2.4: Project Setting-Dam site	7 8
Figure 2.4: Project Setting-Dam site	7 8 9
Figure 2.4: Project Setting-Dam site	7 8 9
Figure 2.4: Project Setting-Dam site	7 8 9 11
Figure 2.4: Project Setting-Dam site	7 8 9 11 15
Figure 2.4: Project Setting-Dam site	7 8 9 11 15 18
Figure 2.4: Project Setting-Dam site	7 8 9 11 15 18 18
Figure 2.4: Project Setting-Dam site	7 8 9 11 15 18 18
Figure 2.4: Project Setting-Dam site	7 8 9 15 18 18 19
Figure 2.4: Project Setting-Dam site	7 8 9 15 18 18 19
Figure 2.4: Project Setting-Dam site	7 8 9 15 18 18 19 19 19
Figure 2.4: Project Setting-Dam site	7 8 9 15 18 18 19 19 41
Figure 2.4: Project Setting-Dam site	7 8 19 15 18 19 19 41 43 44
Figure 2.4: Project Setting-Dam site	7 8 19 15 18 19 19 41 43 44
Figure 2.4: Project Setting-Dam site	78915181919194143444545
Figure 2.4: Project Setting-Dam site	7 8 19 15 18 19 19 41 43 44 45 45
Figure 2.4: Project Setting-Dam site	7 8 19 15 18 19 19 41 43 44 45 45 46
Figure 2.4: Project Setting-Dam site	7 8 19 18 19 19 41 43 44 45 45 46 46
Figure 2.4: Project Setting-Dam site	7891518191941434445464646

TOC

ANNEXURES

Annexure-01: Minutes of HSE Weekly Progress Review Meeting (December 29, 2023)	102
Annexure-02: Due Diligence of Muck Disposal Sites	
Annexure-03: Minutes of Basin-wide BAP Consultation Meetings	
Annexure-04: Copies of Instrumental Environmental Monitoring	
Annexure-05: Solid Waste Disposal NOC from KDA	
Annexure-06: Committee Notification for Graves Shifting	
Annexure-07: Forest Complaint Settlement	

TOC iv

1 INTRODUCTION

1.1 Preamble

1. This is the fifth Semi-Annual Environmental Monitoring Report (SAEMR) for the Balakot Hydropower Project (HPP, 300 megawatt [MW]) covering reporting period from July to December 2023.

1.2 Headline Information

- 2. During the reporting period, the detailed engineering design, review of the engineering, procurement and construction (EPC) Contractor's method statements/technical reports, and construction works at the project residential colony, access roads, including R-03, and excavation at adit tunnels remained in progress.
- 3. Pursuant to the environmental management plan/site-specific environmental management plan (SSEMP) requirements, the EPC Contractor arranged Annual occupational health and safety (OHS) training on August 8 and 9, 2023. The two-day training imparted by professionals of Rescue 1122 of District Mansehra was participated by relevant staff from Project Implementation Unit (PIU), Project Management Consultant (PMC), and the EPC Contractor's health, safety and environment (HSE) staff, along with supervisors from work sites, workshop, and batching plant, etc.
- 4. To the effect of changes in the: (i) implementation arrangement of the Project-specific Biodiversity Action Plan (BAP) in the area of management; (ii) Project-specific BAP Management Committee revised composition, and (iii) design changes at dam site, the Project Environmental Impact Assessment (EIA) report was updated and submitted to the PIU on August 28, 2023 for their review and onward transmission to the relevant quarters at Asian Development Bank (ADB) and Asian Infrastructure Investment Bank (AIIB) for their further review and concurrence.
- 5. From September 13 to 14, 2023, the ADB safeguard progress review mission held meetings with the PIU, PMC and EPC Contractor, and undertook site visit whereby no major non-compliance was observed at the EPC Contractor's camp and works site(s). In connection with the mission proceedings, on September 18, 2023, the Project HSE portfolio presentation was delivered to the mission with particular emphasis on progress made under Project-specific BAP and consultation with the stakeholders of Basin-wide BAP. It was agreed that PIU will submit findings of the upcoming stakeholder consultation meeting with recommendations for future course of actions to ADB for review and consent In this regard, on November 14 and 17, 2023, two virtual meetings were held with the Basin-wide BAP prospective financiers while minutes of the meetings were shared with ADB on December 12 and 13, 2023 respectively.
- 6. On September 25 and 26, 2023, the Environment Expert (EE) of PMC undertook duediligence survey of the muck disposal sites identified by the EPC Contractor. As a result of the survey, out of 10 identified sites, only one site was found suitable subject to construction of protection and drainage works, while the rest of the proposed sites were either found unfeasible or required costly access and huge protection works.
- 7. Consequent upon ADB's concurrence to the proposed changes in the Project-Specific BAP on May 22, 2023, meetings were held with the Fisheries and Wildlife departments of the government of Khyber Pakhtunkhwa (KP), followed by a field visit on October 19, 2023 in connection with identifying the field offices in the Project area. The field office identified by Fisheries department was found suitable while the Wildlife Department was advised to either establish a field office at the existing Sub-Divisional Forest Officer's (SDFO) Office in Balakot, or identify a new facility at any other appropriate location.

1

- 8. On December 6, 2023, the PIU and PMC met with the Director General Fisheries Government of KP and his team in connection with establishing a hatchery in the Project area to comply with the provisions of condition "hh" of the Environmental Approval" of the Project EIA report. A follow up meeting with the Project Director (PD) Balakot HPP (300 MW), and site visit to the Fisheries Department's proposed site for hatchery were the main outcomes of the meeting.
- 9. On December 18, 2023, the PIU and PMC jointly delivered a HSE presentation to the ADB environmental safeguards handover mission at PEDO House Peshawar. It was agreed that the PIU will submit the following reports/plans by January 15, 2024: (i) updated EIA report, (ii) Tree Plantation Plan, and (iii) Blasting Management Plan.
- 10. Although no major non-compliance was observed during the reporting period at the site, the EPC Contractor failed to achieve the Vocational Training milestone set for October 2023.

2 PROJECT DESCRIPTION AND CURRENT ACTIVITIES

2.1 Project Description

- 11. Balakot HPP (300 MW) is run-of-the river scheme to be constructed on the Kunhar River in its 12 kilometer (km) stretch from Paras to Sangar village in District Mansehra of KP province. Upon completion, 1,143-gigawatt hours of clean energy will be delivered to the national grid yearly.
- 12. The Project dam site is located in Paras village, around 2 km downstream of the Sukki Kinari HPP (870 MW) tailrace, while the powerhouse site is proposed at Ganhool village of Balakot. The 9.1 km-long headrace tunnel of 8-meter (m) diameter will divert 154 m³/second design flow of the Kunhar River water to the powerhouse to generate 300 (MW of electricity. The Project residential colony is identified in Sangar village.
- 13. Access road to the dam and power intake is proposed to off-take from National Highway (N-15) on the left side of the Kunhar River in Paras village.
- 14. As exhibited in the EPC Contract, following is the brief scope of works:
 - Project basic and detailed design
 - Temporary works
 - Diversion works
 - Construction of dam
 - Intake structures
 - Adit tunnels (adits-01,02 and 03)
 - Headrace tunnel
 - Surge shaft
 - Powerhouse
 - Access roads (temporary and permanent)
 - Residential colony
 - Switchyard
 - Transmission line
- 15. Project brief salient features are given in **Table 2.1** followed by location maps and the Project setting in **Figures 2.1** to **2.5**.

Table 2.1: Brief Salient Features Hydrology and Design Flows					
River	Kunhar				
Catchment area at dam site (km²)	1939				
Design Discharge (m³/s)	154				
Design Flood (m ³ /s) T= 10 000 years	3500				
Probable Maximum Flood (m³/s)	5000				
Reservoir					
Normal Operation Level (NOL)	1288.0				
Minimum Operation Level (MOL)	1283.0				
Surface area (at MOL) (km²)	0.28				
Length of Reservoir (at NOL) (km)	2.20				
Gross storage capacity (at NOL) (x10 ⁶ m ³)	3.56				
Live storage (at NOL) (x10 ⁶ m ³)	1.20				
Dam Struct					
Type	Concrete Gravity Arch				
Dam crest elevation (masl)	1292.0				
Maximum height above river bed (m)	35.0 58.0				
Maximum height above foundation (m) Crest length (m)	130.0				
Spillways and Low Level Out					
Spillway type	Upper Gated Ogee Crest Spillway + low				
Spillway type	level Gated Spillway				
Upper spillway crest elevation (masl)	1278.0				
Upper spillway gates No. and type	3 (radial gates)				
Upper spillway gates size (W x H) (m)	11 x 10				
Low level spillway invert elevation (masl)	1258.0				
Low level spillway gates no. and type	2 (sluice gates)				
Low level spillway size (WxH) (m)	6 x 8				
Sediment Mana					
Sediment Bypass Tunnel type	Gated Intake followed by Archway Tunnel				
Intake size (WxH)(m)	7.5 x 4.5				
Inlet invert elevation (masl)	1261.0				
Tunnel cross section (W x H) (m)	archway (7.5 x 8.0)				
Tunnel length (m) 650					
Tunnel slope (%)	1.5				
Outlet invert elevation (masl)	1248.0				
Submerged guiding structure crest elevation (masl)	1272.0				
Submerged weir/guiding structure height (m)	21 (estimated maximum above foundation)				
River Diver					
Construction Flood (T= 20 years) (m³/s)	Openings left in the dam hady for the law				
Diversion type	Openings left in the dam body for the low level spillway and a left bank diversion tunnel.				
Upstream Coffer dam type	Concrete gravity solution (which will be further converted to guiding structure)				
Upstream Coffer dam crest elevation (masl)	1272.0				
Downstream Coffer dam type	Concrete gravity solution				
Downstream Coffer dam crest elevation (masl)	1252.5				
Diversion tunnel type	Archway (concrete lined)				
Diversion tunnel no. (-)	1				
Diversion tunnel size (WxH) (m)	Archway (7.5 x 8.0)				
Diversion tunnel length (m)	650				
Diversion tunnel slope (%)	1.5				
Diversion tunnel inlet invert El. (masl)	1261.0				
Diversion tunnel outlet invert El. (masl) 1248.0					
	Power Intake Structure				
Intake type	Horizontal intake				
Trash rack No.	9 × 4 0				
Trash rack size (W x H) (m)	8x10				

Corvino gotos No	2				
Service gates No.	2 4 x 8				
Service gates size (W x H) (m)	1271				
Intake crest elevation (masl). 1271 Headrace Tunnel					
Tunnel section	Circular concrete lined (8.0 m inner				
Turiner Section	diameter)				
Length up to surge tank (m)	9137				
Tunnel slope (%) 0.56% Upstream Surge Shaft					
Type	Concrete lined circular surge shaft				
Internal diameter (m)	14.5				
	122				
Surge shaft height (m) Surge shaft bottom elevation (masl)	1220.0				
Pressure Tunnel/Shaf					
Pressure tunnel/shaft main section type and size	Steel lined circular cross section (5.6 m				
rressure turner/shart main section type and size	internal diameter)				
Proceure tunnel/chaft length (m)	152				
Pressure tunnel/shaft length (m)	88				
Penstock length (m) Branch Section Type	Manifold (3 branches)				
Size of each branch (m)	3.2 m internal diameter conduits				
, ,	~30				
Max. Length of branch (m) Powerhouse and					
Powerhouse type	Conventional underground cavern				
Main cavern general dimensions (LxWxH) (m)	71 x 20 x 34				
Turbine type	Francis				
No. of units	3				
Turbine axis elevation (masl)	1054.0				
No. of generators	3				
Transformer / Substation type	Underground cavern (adjacent to the main				
Transformer / Substation type	powerhouse cavern)				
Transformer cavern general dimensions (LxWxH) (m)					
Downstream Su					
Type	Concrete lined circular surge shaft				
Internal diameter (m)					
Internal diameter (m)	3				
Surge shaft height (m)	3 244				
Surge shaft height (m) Surge shaft bottom elevation (masl)	3 244 1055.0				
Surge shaft height (m) Surge shaft bottom elevation (masl) Tailrace	3 244 1055.0				
Surge shaft height (m) Surge shaft bottom elevation (masl)	3 244 1055.0 Circular tunnel with transition to an archway				
Surge shaft height (m) Surge shaft bottom elevation (masl) Tailrace Type	3 244 1055.0 Circular tunnel with transition to an archway section at the final length and Outlet portal				
Surge shaft height (m) Surge shaft bottom elevation (masl) Tailrace Type Tunnel section	3 244 1055.0 Circular tunnel with transition to an archway section at the final length and Outlet portal Circular concrete lined (8.0 m diameter)				
Surge shaft height (m) Surge shaft bottom elevation (masl) Tailrace Type Tunnel section Length up to the final transition section (m)	3 244 1055.0 Circular tunnel with transition to an archway section at the final length and Outlet portal Circular concrete lined (8.0 m diameter) 1515				
Surge shaft height (m) Surge shaft bottom elevation (masl) Tailrace Type Tunnel section Length up to the final transition section (m) Tunnel slope up to the final transition section (%)	3 244 1055.0 Circular tunnel with transition to an archway section at the final length and Outlet portal Circular concrete lined (8.0 m diameter) 1515 0.23% (ascending slope)				
Surge shaft height (m) Surge shaft bottom elevation (masl) Tailrace Type Tunnel section Length up to the final transition section (m)	3 244 1055.0 Circular tunnel with transition to an archway section at the final length and Outlet portal Circular concrete lined (8.0 m diameter) 1515 0.23% (ascending slope) Archway concrete lined section (8.0 W x 8.0				
Surge shaft height (m) Surge shaft bottom elevation (masl) Tailrace Type Tunnel section Length up to the final transition section (m) Tunnel slope up to the final transition section (%) Tunnel final section	3 244 1055.0 Circular tunnel with transition to an archway section at the final length and Outlet portal Circular concrete lined (8.0 m diameter) 1515 0.23% (ascending slope) Archway concrete lined section (8.0 W x 8.0 H)				
Surge shaft height (m) Surge shaft bottom elevation (masl) Tailrace Type Tunnel section Length up to the final transition section (m) Tunnel slope up to the final transition section (%) Tunnel final section Length from transition to outlet (m)	3 244 1055.0 Circular tunnel with transition to an archway section at the final length and Outlet portal Circular concrete lined (8.0 m diameter) 1515 0.23% (ascending slope) Archway concrete lined section (8.0 W x 8.0 H) 50				
Surge shaft height (m) Surge shaft bottom elevation (masl) Tailrace Type Tunnel section Length up to the final transition section (m) Tunnel slope up to the final transition section (%) Tunnel final section Length from transition to outlet (m) Tunnel slope up to the outlet portal (%)	3 244 1055.0 Circular tunnel with transition to an archway section at the final length and Outlet portal Circular concrete lined (8.0 m diameter) 1515 0.23% (ascending slope) Archway concrete lined section (8.0 W x 8.0 H) 50 15% (ascending slope)				
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Surge shaft height (m) Surge shaft bottom elevation (masl) Tailrace Type Tunnel section Length up to the final transition section (m) Tunnel slope up to the final transition section (%) Tunnel final section Length from transition to outlet (m) Tunnel slope up to the outlet portal (%) Power and E Gross Head (m) Design Net Head (m) Installed plant capacity (MW) Mean annual energy (GWh) Project Access	3 244 1055.0 Circular tunnel with transition to an archway section at the final length and Outlet portal Circular concrete lined (8.0 m diameter) 1515 0.23% (ascending slope) Archway concrete lined section (8.0 W x 8.0 H) 50 15% (ascending slope) nergy 229.0 217.6 300 (at the generator) 1143 (average of 55 years) Facilities				
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Surge shaft height (m) Surge shaft bottom elevation (masl) Tailrace Type Tunnel section Length up to the final transition section (m) Tunnel slope up to the final transition section (%) Tunnel final section Length from transition to outlet (m) Tunnel slope up to the outlet portal (%) Power and E Gross Head (m) Design Net Head (m) Installed plant capacity (MW) Mean annual energy (GWh) Project Access	3 244 1055.0 Circular tunnel with transition to an archway section at the final length and Outlet portal Circular concrete lined (8.0 m diameter) 1515 0.23% (ascending slope) Archway concrete lined section (8.0 W x 8.0 H) 50 15% (ascending slope) nergy 229.0 217.6 300 (at the generator) 1143 (average of 55 years) Facilities 550 m (Off taking from National Highway N-				

TAJIKISTAN Balakot Hydropower Project (300 MW) CHINA KASHMA **AFGHANISTAN** IRAN BALOCHISTAN INDIA BHIGH ARABIAN SEA PAKISTAN MAP

Figure 2.1: Project Location in Pakistan

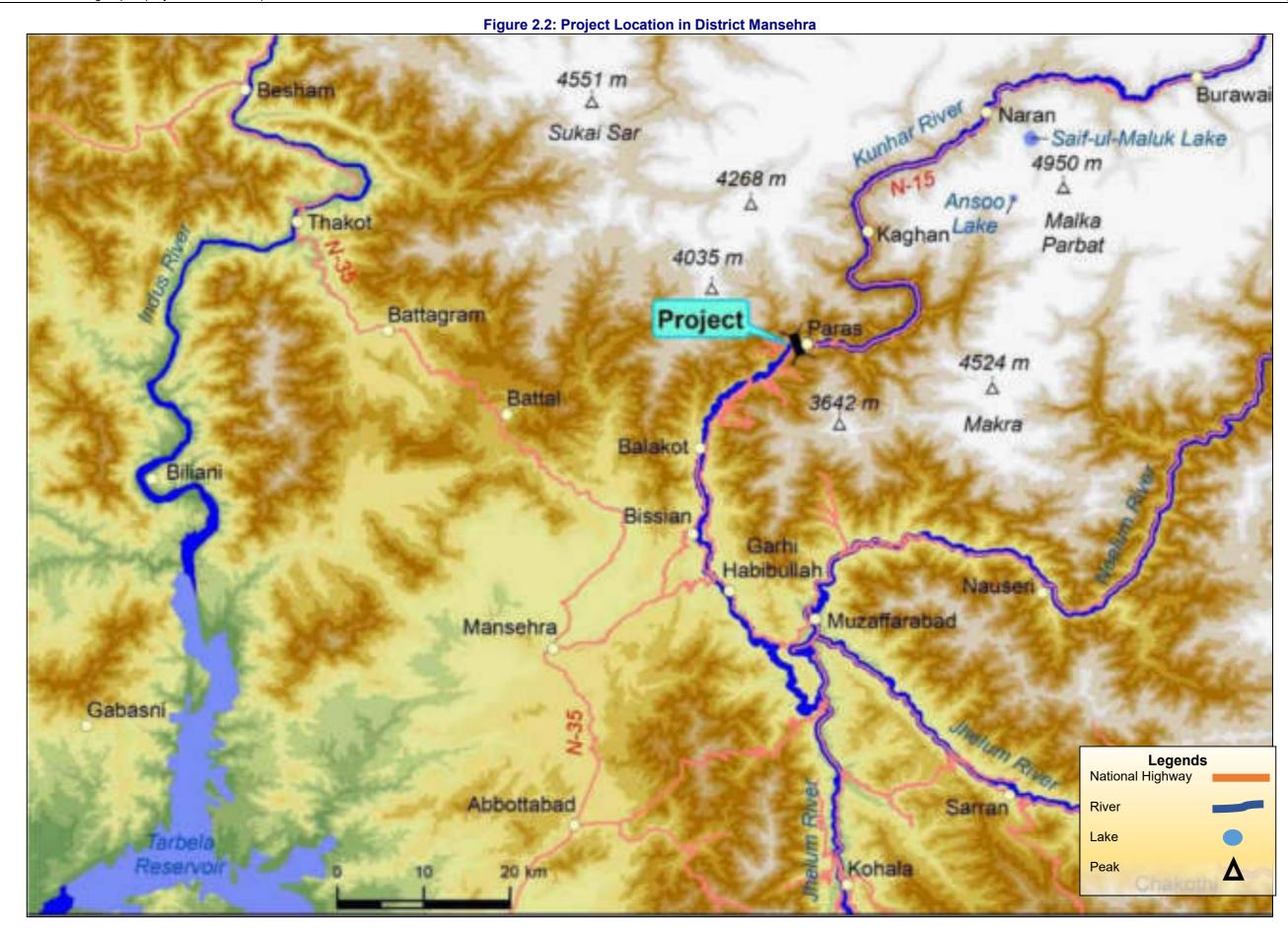


Figure 2.3: Project Layout Map7 DAM LOCATION H=58m **DIVERSION TUNNEL** L=650 m D=7.5x8.0 m PLUNGE POOL **TYPICAL DAM SECTION** ADIT-1 ADIT-2 DAM PLAN N-15 ROAD TYPICAL HEADRACE TUNNEL **HEADRACE-TAILRACE HEADRACE TUNNEL** SURGE SHAFT **TUNNEL CROSS** ADIT-3 L=9 137 m UPSTREAM SECTION D+14.5 m D=8.00 m **SWITCHYARD ACCESS TUNNEL 3 FRANCIS UNITS** VENTILATION AND **POWERHOUSE 3x100MW** CABLE TUNNEL TAILRACE TUNNEL L= 1 515 m. I II D=8.00 m. **SURGE SHAFT** UPSTREAM **POWERHOUSE** SURGE SHAFT D=14.50 m **KEY PLAN** DOWNSTREAM 0<3.8m TRAILRACE TUNNEL CONNECTION TUNNEL

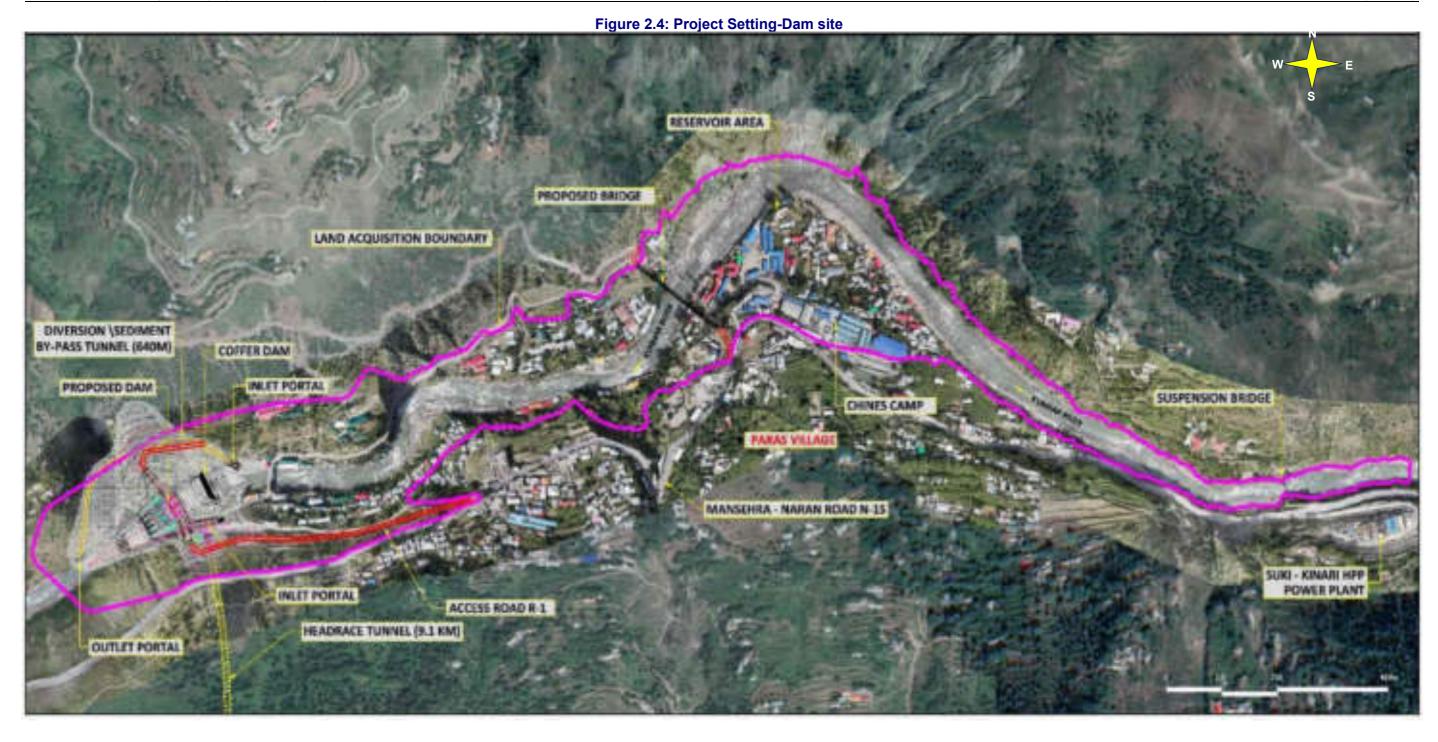
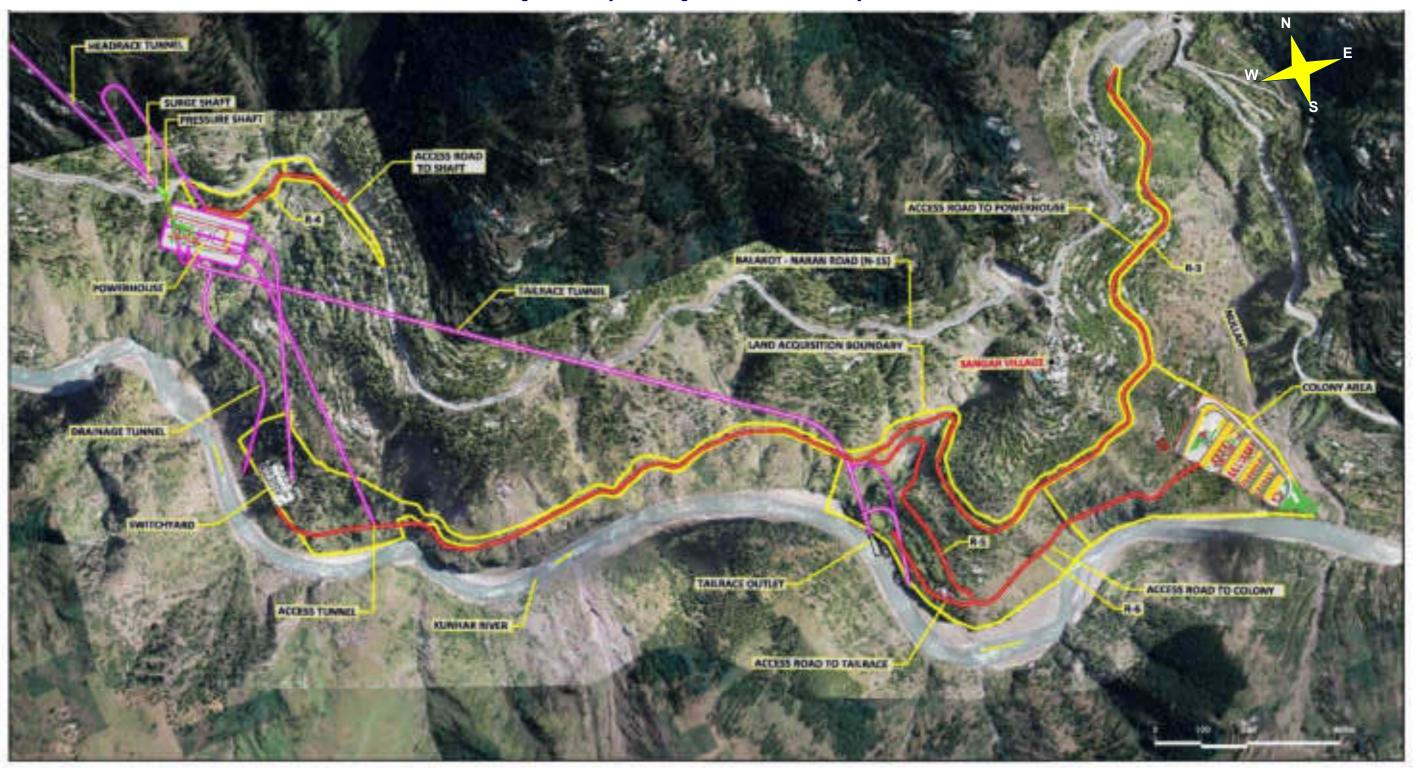


Figure 2.5: Project Setting-Powerhouse and Colony sites



2.2 Project Contracts and Management

2.2.1 Project Implementation Arrangements

16. Balakot HPP (300 MW) is being implemented through the arrangements in **Table 2.2**.

Table 2.2: Project Implementation Arrangement

Arrangement	Organization/Agency		
Funding Sources	 Asian Development Bank (ADB) and Asian Infrastructure Investment Bank (AIIB) through a loan to the Government of Pakistan (Loan No: 4057/8397 (AIIB)-PAK) Government of Khyber Pakhtunkhwa 		
Executing Agency	Energy and Power Department, Government of Khyber Pakhtunkhwa		
Implementing Agency	Pakhtunkhwa Energy Development Organization (PEDO), Government of Khyber Pakhtunkhwa		
Project Management Consultant	Joint Venture of: • DOLSAR Engineering Inc. Co. (Turkey) Lead Firm • AGES Consultants • BAK Consulting Engineers • CivTech Associates • Electra Consultants • Techno Legal Consultants (Pvt.) Limited from Pakistan		
EPC Contractor	Joint Venture of China Gezhouba Group Company (CGGC), China & Ghulam Rasool and Company Pvt. Ltd (GRC), Pakistan		

- 17. For the Project development, the Government of KP signed a loan agreement with ADB on May 21, 2021 which became effective on July 7, 2021.
- 18. As AIIB is the co-financier of the Project, theloan agreement was also signed with AIIB which is effective since October 25, 2021.







Construction Contract Award (2021)

- 19. Brief details of the PIU, PMC and the EPC Contractor are given as hereunder.
- 20. **PIU.** The PIU of Balakot HPP (300 MW), responsible for procurement and supervision of the Project, is currently under establishment by the Implementing Agency (IA), i.e. Pakhtunkhwa Energy Development Organization (PEDO).
- 21. **Figure 2.6** shows the organogram of the PIU wherein, as exhibited in **Table 2.3**, the PD, Deputy Directors and Assistant Directors along with some of the support staff are already onboard, while procurement of the remaining personnel will be initiated when need arise.

Q PS to Project Director Property. Director 4) Assistant Dark Administration Divinional Paint of Chill Works Charten. Francisco. Procedures of & Headle mediance Land that & Stematty & Chickego Produkters. Capacita. UNIT Seasily tinal Works Shot and Contract Quit. (EX 300 Cortonia Districtly Director Land Authors. Deputs Deputy Deputy Advisor Deputy Districtly Finance & Collector Cleaning Charles Director Director Director Circuitor 1.70 Destingly Admir & EHRAT. CHEAT. Principles of a 5 117 Charle Security v. 7 . 1 4.5 Circlasian Larget Accident Assistant Assistant Assessment Advisor ×2 Annidari. Assistant Assistant **Productions** Director Constant. Direction Address K. 6.3 Country Disserted Director Desirior Galdings Samely v 2 BHBAT Civil y 4 Account & Electronic Mod Award of Propose 12 Finance x 5 63 82 & Commercial Hydrologic Palacas 43 Advant 11 93 Civil Works & Geology Med **Electro-Meuhanical Works Unit** 1 Deputy Director (Chit) 6.1 Deputy Director (Generally) # 1 Deputy Director (Necturelasis Transmission. 4: 4 Assistant Directors (Chaf) # 2 Assistant Directors (Electrical) A Chambullon 4. Ukasimbert Director (Geology): 4-5 Assistant Directors (Mechanical) Abrisis x 1:

Figure 2.6: PIU Organogram

Table 2.3: PIU Staff Deployed During the Reporting Period

Staff Designation	Male/Female	No
Project Director (PD)	М	1
Deputy Director (Civil)	М	2
Deputy Director (Social & Resettlement)	М	1
Deputy Director (Environment Health, Safety and Gender)	F	1
Deputy Director (Finance)	М	1
Deputy Director (Geology)	М	1
Deputy Director (Monitoring and Evaluation)	М	1
Assistant Director (Finance)	М	1
Assistant Director (Electrical)	М	2
Account Assistant	М	1
Land Patwari	М	1
Assistant Director (Social and Resettlement)	F	1

22. As evident from the table above, PIU is headed by the PD with whom the overall responsibility of environmental management and monitoring rests. He is assisted by the Environment and Health Security Unit in matters pertaining to the environmental, health and safety (HSE) aspect of the Project. In this regard, Ms. Ibtesaam Zaima, the Deputy Director, HSE and Gender is onboard since March 2022 with full time inputs and can be reached via:

Phone No: +92-3319844851 Email ID: ibtesaamz@gmail.com

- 23. The Deputy Director, HSE and Gender will be assisted by an Assistant Director (Social) who joined PIU in the last week of December 2022.
- Under the provisions of the EPC Contract, the PIU project office was established at the site at the address given below, and is operational since June 2022.

PIU Balakot HPP (300 MW) Site Office

County Hotel, Shohal Najaf Khan Kaghan Road Balakot District Mansehra Khyber Pakhtunkhwa, Pakistan Phone No. 0997-360003

- 25. **PMC.** On September 3, 2020, PEDO entered into a Management Consultancy Service Agreement for Balakot HPP (300 MW) with the joint venture (JV) of DOLSAR Engineering Inc. Co. (Turkey), AGES Consultants, BAK Consulting Engineers, CivTech Associates, Electra Consultants, and Techno Legal Consultants (Pvt.) Limited from Pakistan. The JV is led by DOLSAR Engineering Inc. Co. (Turkey).
- 26. Consultancy services are effective for the duration of 84 months since commencement of services on September 11, 2020. During this period, the JV will provide services specified in the consultancy contract as PMC, and will act on behalf of PEDO as the "Project Manager/Engineer".
- 27. **Table 2.4** shows chronological order of the procurement of consultancy services.

Table 2.4: PMC Procurement Milestones

S/No	Description	Date
1	Expression of Interest	July 29, 2019
2	Technical & Financial Proposals	November 29, 2019
3	Opening of Financial Proposals	May 19, 2020
4	Contract Negotiation Meetings	August 6 and 07, 2020
5	ADB Comments on / Concurrence to Negotiated Contract	August 25, 2020
6	Signing of Contract for Consultancy Services	September 3, 2020
7	Commencement of Services	September 11, 2020

28. **Table 2.5** exhibits details of the PMC's personnel deployed during the reporting period.

Table 2.5: PMC's Personnel Deployed to the Project

S/No	Designation	Inputs			
Expatriate Key Staff					
1	Project Manager - Team Leader	Intermittent			
2	Procurement Expert	Intermittent			
3	Contract Manager	Intermittent			
4	Geotechnical Expert	Intermittent			
5	Hydraulics Expert	Intermittent			
6	Sediment Management Expert	Intermittent			
7	Hydro-Mechanical Expert	Intermittent			
8	Electrical Expert	Intermittent			
	Local Experts				
1	Resident Engineer/Deputy Team Leader	Full Time			
2	Chief Engineer (Dam & Surface Works)	Full Time			
3	Chief Engineer (Underground Works)	Full Time			
4	Electricity Tariff and Power Purchasing Agreement Expert	Intermittent			
5	Quality Assurance Engineer (Dam & Surface Works)	Full Time			
6	Civil Engineer (Tunnel)	Full Time			
7	Quality Assurance Engineer (Underground Works)	Full Time			

S/No	Designation	Inputs
8	Transmission Line Engineer	Intermittent
9	Contract Specialist	Full Time
10	Health and Safety Monitor	Full Time
11	Resettlement Expert	Intermittent
12	Gender/Community Mobilization Expert	Intermittent
13	Environment Expert	Intermittent
14	Document Controller (Monitoring)	Full Time
15	Geologist A	Full Time
16	Geologist B	Full Time
17	Structures Engineer	Intermittent
18	Site Inspector (Dam and Surface Works)	Full Time
19	Site Inspector (Dam and Surface Works)	Full Time
20	Site Inspector (Dam and Surface Works)	Full Time
21	Site Inspector (Underground Works)	Full Time
22	Site Inspector (Underground Works)	Full Time
23	Planning Engineer	Full Time
24	Laboratory Technician	Full Time
25	Laboratory Technician	Full Time
26	Laboratory Technician	Full Time
27	Laboratory Technician	Full Time
28	Cost / Time Controller	Full Time
29	Architect	Full Time
30	Pool of Junior Engineer	Full Time
31	Pool of Junior Engineer	Full Time
32	Pool of Junior Engineer	Full Time
33	Pool of Junior Engineer	Full Time
34	Pool of Junior Engineer	Full Time
35	CAD Operator	Full Time
36	Resettlement Assistant	Full Time
37	Junior Geologist	Full Time
38	Junior Geologist	Full Time
39	Office Manager	Full Time
40	Accountant	Full Time
41	Office Assistant	Full Time
42	Office Assistant	Full Time
43	Accounts Assistant	Full Time
44	Computer Operator	Full Time
45	Computer Operator	Full Time
46	Patwari	Full Time

29. Since commencement of the consultancy services, Engineer Assad Ali Khan, the PMC's EE is onboard with intermittent inputs. The EE can be approached through:

Phone No: +92-3369555505

PMC official email ID: dtlbalakothpp@yahoo.com

30. Also, the Health and Safety Monitor, Mr. Syed Ali Fawad Shah, who joined PMC on December 27, 2022, can be reached via:

Phone No: +92- 3331162119

PMC official email ID: dtlbalakothpp@yahoo.com

31. The PMC has established two offices in the Project area and at theite at the address given below. These offices are operational since June 2022 and August 2023, respectively.

PMC Office in the Project Area

Four Seasons Hotel, Near PTCL Exchange Kaghan Road Balakot District Mansehra Khyber Pakhtunkhwa, Pakistan

Phone No: +92-997-360155

PMC Site Office

Royal Paras Hotel, Opposite Sohail Filling Station, Kaghan Road Paras, Tehsil Balakot District Mansehra Khyber Pakhtunkhwa, Pakistan

Phone No: +92-997-360155

- 32. **EPC Contractor.** The construction contract of Balakot HPP (300 MW) was awarded to the JV of China Gezhouba Group Company (CGGC), China & Ghulam Rasool and Company Pvt. Ltd (GRC), Pakistan on Marh 9, 2021.
- 33. Consequent upon fulfillment of the requisite conditions of the EPC Contract, PEDO notified September 27, 2021 as Effective Date for the EPC Contract.
- 34. Various milestones achieved during procurement process of the EPC Contract are in Table 2.6.

S/No **Description** Date Invitation for Bids November 23, 2019 2 Site visit to Bidders December 10, 2019 Pre-Bid Meeting December 13, 2019 3 Bid Submission June 15, 2020 4 5 Technical Bid Opening June 15, 2020 Financial Bid Opening December 15, 2020 6 Notification of Award February 10, 2021 7 March 09, 2020 Contract Signing 8 Effective Date September 27, 2021

Table 2.6: EPC Contract Procurement Milestones

- 35. The EPC Contractor's environmental obligations are mainly specified in Volume-01 of 07 (Appendix-9) and Volume-03 of 07 (GCC & SCC) of the EPC Contract.
- 36. Under the provisions of the conditions of contract, preparation of the SSEMP is one of the EPC Contractor's contractual obligations. Although SSEMP will primarily be based on the essence of the approved EIA report and site requirements, due preference will also be given to the Safeguard Policy Statement 2009 guidelines and conditions contained in the "Environmental Approval" granted by the Khyber Pakhtunkhwa Environmental Protection Agency (KPEA) on July 6, 2021.
- 37. During all three phases of the Project, i.e. pre-construction, construction, and defects liability period, the EPC Contractor will take care of the HSE portfolio through implementing measures proposed in the SSEMP, good practices, and instructions issued or filling gaps identified in the monitoring reports during the contract.

38. **Figure 2.7** exhibits the EPC Contractor's HSE organogram followed by Table 2.7 showing details of the HSE team onboard so far.

H&S Manager

Medical Staff

HS Staff

Project Manager

Environmental Manager

Environmental Staff

Figure 2.7: EPC Contractor' HSE Team Organogram

Table 2.7: EPC Contractor's HSE Team

S/NO	Name	Designation	Duty Station	Contact Number
1	Qi Ziu Feng	Health andSafety Manager	Site and office	+92-326-8116666
2	Irshad Saeed	Environmental Manager	Site and office	+92-305-9028481
3	Wang He	HSE Officer	Site and office	+92-307-5552090
4	Guang Jiongji	QHSE Officer	Site and office	+92-307-5552129
5	Wang Zhen	HSE Officer	Site and office	+92- 346 8500824
6	Syed Babar Ali	HSE Officer	Site and office	+92-344-9661669
7	Zaigham Shah	HSE Officer	Adit-01(Kawai)	+92-324-9191434
8	Saeedul Haq	HSE Officer	Adit-02 (Ganhool)	+92-346-8292024
9	Momin Khan	HSE Officer	Adit-03 (Kholian)	+92-315-1855378
10	Syed Hassan Shah	HSE Officer	Dam Site (Paras)	+92-3432152402

2.2.2 Project HSE Safeguard Team

39. From the details given under above, the HSE personnel responsible for the HSE safeguards are detailed in **Table 2.8**.

Table 2.8: Details of HSE Personnel

Organization	Job Title	Name	Contact Details	
ADB	Senior Environmental Specialist (Country Environment Focal)	Nurlan Djenchuraev	ndjenchuraev@adb.org	
ADB	Environmental Specialist – regional technical assistance consultant	Abdul Hadi	ahadi.consultant@adb.org	
PIU	Deputy Director HSE and Gender	Ibtesaam Zaima	ibtesaamz@gmail.com	
PMC	Environmental Expert	Assad Ali Khan	dtlbalakothpp@yahoo.com	
FIVIC	Health and Safety Monitor	Fawad Ali Shah		
	Qi Ziu Feng	H & S Manager	453680735@qq.com	
	Irshad Saeed	Environmental Manager		
	Wang He	HSE Officer		
	Guang Jiongji	HSE Officer		
EPC	Wang Zhen	HSE Officer		
Contractor	Syed Babar Ali	HSE Officer	cggcbjstbalakot@126.com	
	Zaigham Shah	HSE Officer		
	Saeedul Haq	HSE Officer		
	Momin Khan	HSE Officer		
	Syed Hassan Shah	HSE Officer		

2.3 Project Activities during Current Reporting Period

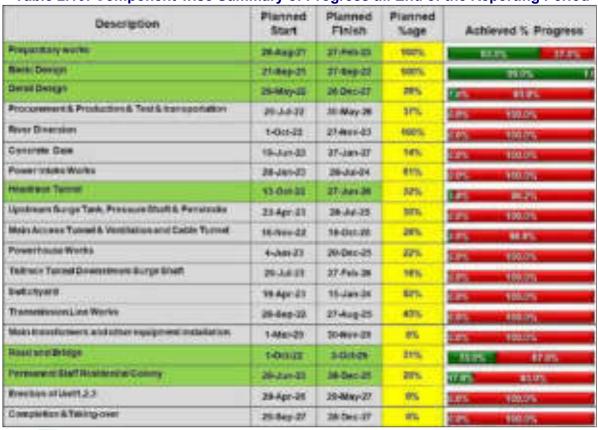
40. During the reporting period, construction works at the Project residential colony, access roads, including access road at dam site, excavation at adit tunnels and installation of batching plant at Adit-03 site remained in progress.

Table 2.9 summarizes the EPC contract and overall works progress achieved so far. Table 2.10 exhibits component-wise progress achieved till end of the reporting period against planned targets.

Table 2.9: Summary of Overall Progress of EPC Contract till End of the Reporting Period

Contract	SSEMP1	Perso	nnel	Civil W	orks ²	Progress as of		
Signing	Approval	Environmental Manager	Health and Safety Manager	Start	End	June 30, 2023	December 31.2023	
March 9.	December 30.	J	, ,		lanuani	6.21%	8.60%	
2020	2022	iisiiau Saeeu	Qi Xiu Feng	September 28, 2022	January 1, 2027	0.∠1%	0.00%	

Table 2.10: Component-wise Summary of Progress till End of the Reporting Period



The manpower deployed at Site during the reporting period is in **Table 2.11**, followed by staff deployment trend in Figure 2.8. The total workforce deployment since commencement of works is in Figure 2.9.

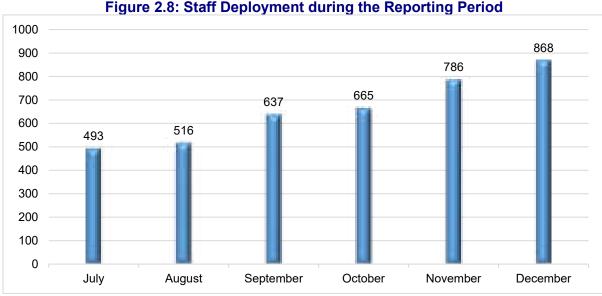
Table 2.11: Manpower Deployed to the Project during Reporting Period

S/No	Staff			Report	ing Mont	h	
3/110	Stati	Jul	Aug	Sep	Oct	Nov	Dec
1	Project Manager	1	1	1	1	1	1
2	Planning, Engineering &Technical Director (DPM)	1	1	2	2	2	2
3	QHSE Director (DPM)		1	1	1	1	1
4	Contract and Commercial Director (DPM)	1	1	1	1	1	1
5	Equipment and Material Director (DPM)	1	1	1	1	1	1
6	Deputy Director of Technical &Planning	1	1	1	1	1	1
7	Deputy Director of Contract and Commercial		1	1	1	1	1
8	Administrative Director of Administrative	1	1	1	1	1	1

¹ The SSEMP, approved by the Employer, contained Emergency Response Plan and COVID-19 safeguard provisions.

² The start and end dates of the civil works are those contained in the last approved Program of Work (Work Schedule).

		Reporting Month							
S/No	Staff	Jul	Aug	Sep	Oct	Nov	Dec		
9	Environmental Manager	1	1	1	1	1	1		
10	Contract and Commercial Management Department	5	6	6	5	5	10		
	Planning, Engineering and Technical Management								
11	Department	10	11	13	12	12	14		
12	QHSE Management Department	7	8	9	9	11	14		
13	Equipment and Materials Department	8	10	10	15	15	15		
14	Financial Management Department	3	3	3	2	4	4		
15	Administration & Human Resources Department	20	20	28	35	35	40		
16	Mechanical Operators and Driver Team	35	45	49	67	82	90		
17	Surveyor Team	5	8	8	8	10	10		
18	Laboratory Team	4	4	4	8	8	9		
19	General Team ElectricityWater supply A-02&A-03	30	35	35	45	40	45		
	A3 Camp Retaining wall Skilled and Unskilled	67	53	43	43	43	48		
20	Laborers	07		43	43	43	40		
21	Batching Plant Team A-02	13	13	18	14	10	15		
22	Steel factory team A-02	0	0	0	11	16	21		
23	Design & Geologist Management	7	6	6	5	5	5		
24	Adit-02 Skilled and Unskilled Laborers	45	48	48	32	82	72		
25	Adit-03 Skilled and Unskilled Laborers	15	30	30	50	50	65		
26	Batching Plant Team A-03	0	0	0	0	17	22		
27	Main Access Tunnel Powerhouse	0	0	17	27	22	22		
28	Dam Site	0	0	0	0	0	16		
29	Site Manager	1	1	1	1	1	1		
30	Planning Engineer	3	3	3	3	3	3		
31	Construction Manager	2	2	1	1	1	1		
32	Admin Manager	1	1	2	2	2	2		
33	Quantity Surveyor	1	1	1	1	1	1		
34	Site Engineer	2	2	2	2	2	2		
35	Site Engineer	3	3	3	3	3	3		
36	Chief Surveyor	2	2	2	2	2	2		
37	Land Surveyor	5	5	4	4	4	4		
38	Assistant Surveyor	1	1	11	1	1	1		
39	Material Engineer	1	1	1	1	1	1		
40	Senior Engineer Technical	1	1	1	1	1	1		
41	Structure Engineer	1	1	1	1	1	1		
42	Senior Planning Engineer	3	3	3	3	3	3		
43	Senior Accountant	1	1	1	1	1	1		
44	Lab Technician	1	1	1	2	2	2		
45	Electrical Engineer	1	1	1	1	1	1		
46	Store Keepers	2	2	2	2	2	2		
47	Quantity Surveyor	0	0	0	0	1	1		
48	Mechanical Purchaser	0	0	0	0	1	1		
49	Senior Engineer	0	0	0	0	1	1		
50	Health Safety Inspector	1	1	1	1	1	1		
51	HSE In charge	1	1	0	0	0	0		
52	Geologist	2	3	3	3	3	3		
53	Skilled Laborers	86	90	150	130	136	144		
54	Unskilled Laborers	88	80	115	101	134	138		
	Total (No)	493	516	637	665	786	868		
Out of	Out of Total, Local Employed Workforce (No) 293 301 310 332 306 478								



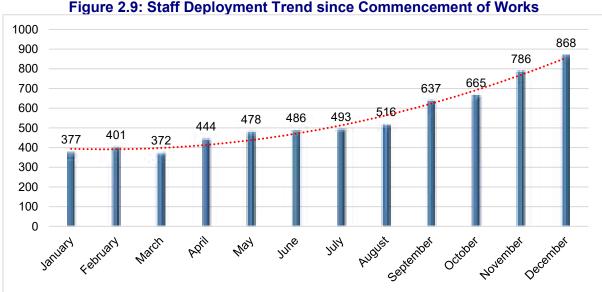
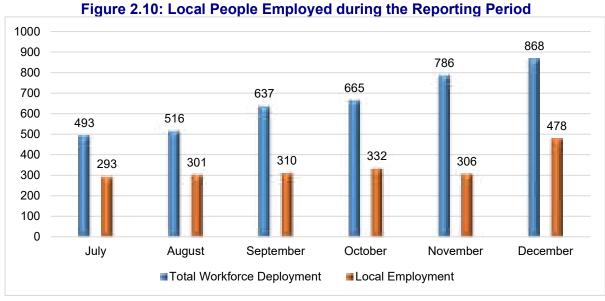
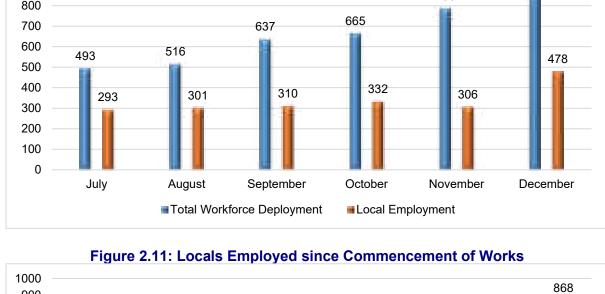
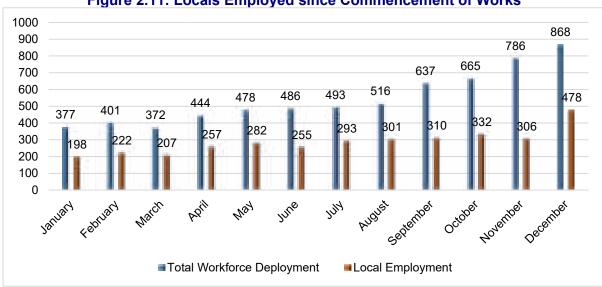


Figure 2.9: Staff Deployment Trend since Commencement of Works

- 43. As evident from the above figures, there is gradual increase in the EPC Contractor's workforce which shows increase in the existing construction activities and initiation of new activities at different sites.
- Statistics of locals employed by the EPC Contractor during the reporting period and 44. since commencing works are in Figures 2.10 and 2.11 respectively.
- As evident from the presentation, although there occurred a vivid increase in the EPC 45. Contractor's overall workforce deployment, there was no such increase in local employment. In fact, the local employment percentages decreased in the last three months of the current reporting period, except for December where the percentage has shown some recovery. The EPC Contractor reported that as locals are mainly employed by subcontractors, the decrease in local employment is primarily attributed to the replacement of subcontractors during September, October and November of the reporting period which affected local employment. However, as stated, during the last month of the reporting period, there has been an increase in local employed persons.







46. Table 2.12 exhibits the EPC Contractor machinery and important equipment deployed to the Site. The heavy machinery was mainly deployed for earthwork activities and transporting materials, including concrete to the construction sites.

Table 2.12: Machinery Deployed to Project during the Reporting Period

	Table 2.12. Wacilile	t during	uie i						
S/No	Machine	Model	Total No.		Dej	oloyn	nent N	/lonth	
3/110	Widefille	Wiodei	Deployed	Jul	Aug	Sep	Oct	Nov	Dec
1	Excavator	HITACHI 200	1	1	1	1	1	1	1
2	Excavator	Hyundai	1	1	1	1	1	1	1
3	Crawl Excavator	CDM 6225	1	1	1	1	1	1	1
4	Excavator	HITACHI 200	5	5	5	5	5	5	5
5	Excavator	Doosan 210,225	4	4	4	4	4	4	4
6	Excavator	CAT,HYUNDAI	4	4	4	4	4	4	4
7	Excavator	Volvo 145, Sunny	5	5	5	5	5	5	5
8	Crawl Excavator	HITACHI 200	4	4	4	4	4	4	4
9	Loader		2	2	2	2	2	2	2
10	Mini Dumper		2	2	2	2	2	2	2
11	Dump Truck	FAW 280	5	5	5	5	5	5	5
12	Roller		1	1	1	1	1	1	1
13	Generator	200, 200, 65 KV 15 KV, 250	6	6	6	6	6	6	6
14	Batching plant	0.5m3	1	1	1	1	1	1	1

			Total No.		Do	alovn	ont N	l onth	
S/No	Machine	Model	Deployed	Jul	Aug	Sep		Nov	Dec
15	Double Cabin	Revo, Tiger 2002	2	2	2	2	2	2	2
16	Car	Toyota Corolla	1	1	1	1	1	1	1
17	Transit Mixer	Nissan, Hino	2	2	2	2	2	2	2
18	Compressor/12Bar		2	2	2	2	2	2	2
19	Jeep		2	2	2	2	2	2	2
20	Trolley Crane		1	1	11	1	1	1	1
21	Drilling Equipment		14	14	14	14	14	14	14
22	Shotcrete Pump		2	2	2	2	2	2	2
23	Ventilation Fan	0751014	1	1	1	1	1	1	1
24	Power Generator	375KVA	1	1	1	1	1	1	1
25 26	Air Compressor Peter Engine	25HP	2	2	<u>1</u>	2	2	2	2
27	Bulldozer	ZUMP	2	2	2	2	2	2	2
28	Car	Toyota Fortuner	1	1	1	1	1	1	1
		Mobile Sunny/							
29	Excavator	SAY155UU	1	1	1	1	1	1	1
30	Skid Dumper		1	1	1	1	1	1	1
31	Water Bozer		1	1	1	1	1	1	1
32	Concrete Silo		1	1	1	1	1	1	1
33	Mobile Shotcrete Pump		1	1	1	1	1	1	1
34	Vigo Hilux		1	1	1	1	1	1	1
35	Dumper skid fiori		1	1	1	1	1	1	1
36	Power Generator 200 KVA		1	1	1	1	1	1	1
37	Dumper	Mini Hino	1	1	1	1	1	1	1
38	Generator	Cat	1	0	0	0	0	0	1
39	Air Compressor		1	0	0	0	0	0	1
40	Tractor		1	0	0	0	0	0	1
41	Jeep		1	0	0	0	0	0	1
42	Batching Plant	0.5 m3	1	0	0	0	0	0	1
43	Transit Mixer		1	0	1	1	1	1	1
44	Weighing Bridge		1	0	0	0	0	0	1
45	Dumper	D0000 0	1	0	0	0	0	0	1
46	Crawl Excavators	PC200-8	1	1	1	1	1	1	1
47 48	Dump Trucks Excavator	SCHMAN Hitachi 200, Hitachi 220	7 2	7	7	7	7	7	7
49	Excavator	CATN320D, Hyundai 210	2	2	2	2	2	2	2
	EXCAVATO	Komatsu 200, Komatsu							
50	Excavator	100	2	2	2	2	2	2	2
51	Loader	LW500	1	1	1	1	1	1	1
52	Crawler bulldozer	SD22	2	2	2	2	2	2	2
53	Side dump loader	WA380-6	1	1	1	1	1	1	1
54	Jeep		1	1	1	1	1	1	1
55	Loader	LW500FN, LW300FN	3	3	3	3	3	3	3
56	Diesel generators	V550C2, HDG22	2	2	2	2	2	2	2
57	Diesel generators	Perkins 121hp,1106A- 70TG1	2	2	2	2	2	2	2
58	Water tank	SCS5160GSS	2	2	2	2	2	2	2
59	Concrete Mixture Machine		2	2	2	2	2	2	2
60	Diesel tank	Foton Daimler, M600	1	1	1	1	1	1	1
61	Water truck	DLQ5161GSSZ4	1	1	1	1	1	1	1
62	Flatbed truck	FG1JKPB	1	1	1	1	1	1	1
63	Concrete Mixture Machine		3	3	3	3	3	3	3
64	GPS-RTK Survey System Brand	Nan fang S82	4	4	4	4	4	4	4
65	Total station Brand	GPT-4002LN	1	1	1	1	1	1	1
66	Digital Levelling Instruments	Trimble DINI03	1	1	1	1	1	1	1
67	Pickup	4X4	4	4	4	4	4	4	4
68	Car	Prado	3	3	3	3	3	3	3
69	Car	MJ	1	1	1	1	1	1	1
70	Road Roller	XS183JPD	1	1	1	1	1	1	1

			Total No.		Do	alove	nent N	/lonth	
S/No	Machine	Model	Deployed	Jul	Aug			Nov	Dec
71	Air Compressors		2	2	2	2	2	2	2
72	Crawler Drilling machine	T35	1	1	1	1	1	1	1
73	Diesel Air Compressor	XRHS666CD, XAHS750	2	2	2	2	2	2	2
74	Mobile truck crane 25 tons	QY25K5-I	1	1	1	1	1	1	1
75	Concrete Pump	HBT80.13.112RSD, HBT60.16.110SU	2	2	2	2	2	2	2
76	Power Transformer	500,800KV,100,1200KV &1250	5	5	5	5	5	5	5
77	Single Arm Rock Drilling Rig	D7	1	1	1	1	1	1	1
78	Binding Machine		1	1	1	1	1	1	1
79	Shaper	BC6063	1	1	1	1	1	1	1
80	jib crane	BZD-2	1	1	1	1	1	1	1
81	jib crane	BZD-2	1	1	1	1	1	1	1
82	Digital Underground Scale	SCS-60	1	1	1	1	1	1	1
83	low voltage switch box	380V 1600A	1	1	1	1	1	1	1
84	low voltage switch box	380V 2000A	1	1	1	1	1	1	1
85	low voltage switch box	UAN111-354-111	1	1	1	1	1	1	1
86	Ordinary lathe	C6160C	1	1	1	1	1	1	1
87	Vertical lifting table milling machine	ZX7045	1	1	1	1	1	1	1
88	Shaper	BC6063	1	1	1	1	1	1	1
89	sewage pump	TS200-125-365	1	1	1	1	1	1	1
90	oil storage tank	5170 Gallon 19500L	1	1	1	1	1	1	1
91 92	lathe	CY6166B-3000	1	1	1	1	1	1	1
93	Shaper Vertical lifting table milling machine	B6065 XQ6232W-B	1	1	1	1	1	1	1
94	Radial drilling machine	Z5140A	1	1	1	1	1	1	1
95	Single column press	YX41-100T	1	1	1	1	1	1	1
96	Other hydraulic presses (pipe crimping machines)	XM91-C1	1	1	1	1	1	1	1
97	lathe		1	1	1	1	1	1	1
98	Dump truck	Volvo	1	1	1	1	1	1	1
99	Excavator	210,323&323	3	3	3	3	3	3	3
100	Car	Mazda	1	1	1	1	1	1	1
101	Pickup double cabin		1	1	1	1	1	1	1
102	Lifter	4.00	1	1	1	1	1	1	1
103 104	Batching Plant Ventilation Fan	1.0m3	1	1	1	1	1	1	1
105	Electric Air Compressor	XAMS850E	1	-	1	1	1	1	1
106	Transit Mixer Machine	ZZ1257N3641W	4		1	4	4	4	4
107	Wheel Excavator	Doosan DX210W	1	-	1	1	1	1	1
108	Wet Spray Trolley	TSR 2010	1	-	1	1	1	1	1
109	Loader	LW300FN	1	-	1	1	1	1	1
110	Robotic Arm Wet spray Machine	Sika Alive 272	1	•	1	1	1	1	1
111	Screw Air Compressor	XAS 186	1	•	1	1	1	1	1
112	Large Axial Flow Fan	AVH140.90.4	1	•	1	1	1	1	1
113	Dynamo	V550C2	1	-	1	1	1	1	1
114	Dynamo	J110 kVA	1	-	-	1	1	1	1
115	Wet spray trolley	TSR2010	1	-	-	1	1	1	1
116	Loader (robot arm) Robotic arm wet spray	LW300FN	1	-	-	1	1	1	1
117	concrete pump Robotic arm wet spray	Sika aliva702+Aliva302.1	1	-	-	1	1	1	1
118	concrete pump	Sika aliva702+Aliva302.1	1	-	-	1	1	1	1
119	dump truck	SX3255DR384R	1	-	-	1	1	1	1

S/No	Machine	Model	Total No.		Dej	oloyn	nent N	onth	
3/NO	Machine	Wodel	Deployed	Jul	Aug	Sep	Oct	Nov	Dec
120	dump truck	SX3255DR384R	1	•	-	1	1	1	1
121	Diesel generators	1106A-70TG1/UCI274F	1	•	-	1	1	1	1
122	Diesel generators	SDMO MODEL J110KVA	1	•	-	1	1	1	1
123	dynamo	CUPP640(S)	1	-	-	1	1	1	1
124	dynamo	CUPP640(S)	1		-	1	1	1	1
125	Electric air compressor	XAMS850E	1	•	-	1	1	1	1
126	screw compressor	XAS186	1	•	-	1	1	1	1
127	Electric air compressor	XAMS850E	1	-	-	1	1	1	1
128	Electric air compressor	XAMS850E	1	-	1	1	1	1	1
129	Electric air compressor	XAMS850E	1	-	1	1	1	1	1
130	Electric air compressor	XAMS850E	1	-	-	1	1	1	1
131	Axial Fan	2*AVH125.90.4.8	1	-	-	1	1	1	1
132	Three Arm Trolley	BOOMER XL3D	1	0	0	0	0	0	1
133	Geological Drilling Rig	Xy-2	1	0	0	0	0	0	1

2.4 Material Resource Utilization

47. During the reporting period, several major construction materials were utilized in constructing permanent works. These materials include reinforced steel, cement, sand, and coarse aggregates. All of these materials were sourced from approved suppliers to ensure their quality and compliance with Project standards. The EPC Contractor procured construction materials from the approved sources mentioned against each type of construction material.

i. Coarse aggregate: Black Dimond and Ghumanii. Fine aggregate: Lawrencepur, Maira and Thakot

iii. Cement: Askari and Fauji iv. Reinforced steel: Fazal and Ittifaq

- 48. Water used for concrete production was supplied from the local water sources with the prior written permission from the owner(s) of the source/users.
- 49. **Tables 2.13 and 2.14** show month-wise and cumulative details of the materials used in the Project construction activities including those stored at the Site. During the current reporting period, due to increase in construction activities, there is a vivid increase in the quantum of POL and water usage.

Table 2.13: Month-wise and Cumulative Details of Construction Materials

S/No	Month	Steel (Ton)	Cement (Bag)	Sand (cft)	Aggregates (cft)
1	July	32	1120	4163	2349
2	August	40	2100	3339	2179
3	September	8	2196	18617	10594.4
4	October	20	3412	12604	5484
5	November	15	8955	35256	30608
6	December	209.97	28191	63319	47424
Total for I	Reporting Period				
(July-Dec	ember 2023)	324.97	45974	137298	98638.4
Total for I	Total for Previous Reporting				
Period (Ja	an-June 2023)	293	2056	17635.13	24429
Cumul	ative for the Project	617.97	48030	154933.13	123067.4

Table 2.14: Month-wise and Cumulative Details of POL and Water Used (in Liter)

S/No	Month	Diesel	Petrol	Water
1	July	55758	984	635700
2	August	69450	832	631800
3	September	100699	819.67	891800

S/No	Month	Diesel	Petrol	Water
4	October		704.9	897750
5	November	113854	492.23	1021800
6	December	180063	750.19	1128400
Total for Rep	orting Period (July-December 2023)	586033	4582.99	5207250
Total for Prev	vious Reporting Period (January-June 2023)	365025	2842.5	3047400
Cumulative for	or the Project since Commencement of Works	951058	7425.49	8254650



Construction Works at Adit Tunnel-01



Construction Works at Adit Tunnel-02



Construction Works at Adit Tunnel-03



Construction of Retaining Wall at R-04



Overview of R-03 and Connected Roads



Construction Works at Residential Colony

2.5 Description of Any Changes to the Project Design

50. There were no design changes in the reporting period. The Employer is yet to grant approval to the design changes reported in the previous SAEMR for January to June 2023 as the proposed changes are still under review by the independent panel of experts.

2.6 Description of Any Changes to the Agreed Construction Methods

51. Since approval of the basic engineering design on March 31, 2023, the EPC Contractor has been regularly submitting method statements for the PMC's review and approval. Although no changes have been proposed in the approved method statements so far, the approved changes will be reported in the corresponding SAEMR.

3 ENVIRONMENTAL SAFEGUARD ACTIVITIES

3.1 General Description of Environmental Safeguard Activities

- 52. During the reporting period, construction works at the Project residential colony, access roads, including access road at dam site, excavation at adit tunnels, and installation of batching plant at Adit-03 site remained in progress.
- 53. HSE aspects of the aforementioned activities were regularly monitored and supervised by the PMC and PIU staff. Also, during the reporting period, the PMC supervisory staff monitored quarterly instrumental environmental monitoring conducted by the KPEPAapproved laboratory at the pre-identified locations at Site.
- 54. During the reporting period, PMC and PIU relevant staff undertook site visits in connection with the due diligence survey of the muck disposal sites identified by the EPC Contractor, and offices identified by the Wildlife and Fisheries departments of the government of KP for executing activities envisaged under the Project-specific BAP in the area of management. Also, consultation meetings were held with the stakeholders of the Project specific and Basin-wide BAPs.
- 55. During The regular weekly and fortnightly HSE progress review meetings among PIU, PMC and EPC Contractor, HSE activities were prioritized, action plans were furnished, and targets were set for rectifying non-complied activities observed during the course of HSE supervision by the PMC/PIU supervisory staff. A copy of the minutes of meeting of one such meeting is attached as **Annexure-01**.
- 56. From September 13 to 14, 2023, the ADB safeguard progress review mission met with the PIU, PMC and EPC Contractor, and undertook Site visit whereby no major non-compliance was observed at the EPC Contractor's camp at works site(s). In connection with the mission proceedings, on September 18, 2023, the project HSE portfolio presentation was delivered to with particular emphasis on Project-specific BAP implementation, and consultation with the stakeholders of Basin-wide BAP. Also, on December 18, 2023, the PIU and PMC jointly delivered the HSE portfolio presentation to the ADB environmental safeguards handover mission in PEDO House Peshawar.
- 57. In addition to the regular Site visits of the Health and Safety Monitor of PMC, the EEM, ADB safeguards team, Deputy Director HSE and Gender of PIU, and EE of the PMC undertook site audits in various months of the reporting period.
- 58. Alongside other periodic HSE trainings, like trainings on induction and toolbox talks on August 8 and 9, 2023, the EPC Contractor organized a two-day annual OHS training imparted by Rescue 1122 of District Mansehra. To encourage the workforce in adapting to and implementing HSE provisions, the EPC Contractor held regular HSE champion programs whereby trophies and cash prizes were distributed among HSE Champions of the Month.
- 59. Following is a brief description of the major safeguard activities undertaken during the reporting period.

3.1.1 HSE Progress Review Meetings

- 60. As apprised in the preceding paras, to ensure consistent implementation of the HSE provisions at Site and at construction camp(s), and to resolve non-complied issues, regular tripartite meetings among PIU, PMC and EPC Contractor are being held since commencement of Works at Site. The agenda items for such meetings usually remained the same, i.e. itemwise review of HSE progress, review of targets set in the previous meeting(s), furnishing weekly workplan for non-resolved issues, and identifying impediments to implementing measures proposed in the EMP/SSEMP. Minutes of one such meeting are attached as **Annexure-01** to the report.
- 61. So far, these meetings have been effective in resolving HSE-related Site issues and pushing the EPC Contractor to swiftly resolve pending issues/non-compliances. These weekly/fortnightly meetings also enabled the supervisory staff to quickly fill the gaps identified, and decide on matters requiring PMC/PIU's decision.



HSE Weekly Progress Review Meeting on October 27, 2023

3.1.2 Due Diligence of Muck Disposal Sites and Batching Plant

- 62. During the reporting period, the EE of PMC undertook due diligence of sites identified by the EPC Contractor for disposal of muck material and batching plant.
- 63. **Muck disposal sites.** On September 25 and 26, 2023, the EE of PMC undertook duediligence survey of the potential muck disposal sites. Findings of the due diligence survey were accordingly shared with the EPC Contractor for further necessary action as instructed by the PMC. Out of the ten (10) identified sites, only one site was found suitable subject to construction of protection and drainage works, while the rest were either found unfeasible or required costly access and huge protection works.
- 64. Synopsis of the PMC findings, the EPC Contractor's required actions thereto, and future submissions for review are attached as **Annexure-02**.
- 65. **Batching plant site.** Pursuant to the ADB Safeguard team's directions at the meeting held on September 14, 2023 at the EPC Contractor's A-02 Camp, the EE of PMC furnished the Batching Plant Due Diligence report, which was submitted to ADB on September 18, 2023 for review and concurrence. The report is primarily based on findings and recommendations of the plant due diligence surveys carried out in August and November 2022.



PMC EE's Visit to the Identified Muck Disposal Site at R-03 (September 25, 2023)

66. As shown on the Google image below, the proposed batching plant site is identified at the left bank of the Ganhool Nullah, around 200 m downstream of the main camp with elevation difference of around 10 m. The site was found suitable subject to construction of protection works along the Ganhool Nullah.



Site Identified for Batching Plant

3.1.3 Biodiversity Action Plan

- 67. In the EIA report, two types of Biodiversity Action Plans (BAPs) were identified, i.e. (i) Basin-wide BAP, and (ii) Project-specific BAP in the Area of Management. As such, BAP activities carried out during the reporting period are separately described as follows.
- 68. **Basin-wide BAP.** In continuation of consultation meetings with stakeholders in August and September 2022 and thereafter as agreed with the ADB safeguards team on September 18, 2023, the PIU arranged two virtual meetings on the agenda item, "Biodiversity Action Plan (BAP) financing provisions in the EIA reports/tariff of hydropower projects in the Jhelum Basin and assessment of challenges in its materialization". The meeting on November 14, 2023 was participated by Basin-wide BAP prospective financiers, i.e. Karot, Mahal and Kohala HPPs, while the second meeting on November 17, 2023 was participated by representatives from Sukki Kinari and Azad Pattan HPPs. Minutes of both the meetings are attached as **Annexure-03**.
- 69. In both meetings, although some of the project developers explicitly excused of financial contributions in establishing the Institute for Research on River Ecology (IRRE) and Watershed Management Organization (WMO), it was generally agreed that PIU should call

larger consultation meetings involving the Private Power and Infrastructure Board (PPIB), hydropower developers and ADB to shape future course of action. Due to the immense challenges/constraint coupled with the absence of policy instrument, neither PEDO nor a single project developer has the capacity/legal authority to lead the initiative.

- 70. The proposed larger consultation meeting is tentatively scheduled in the third week of February 2024. Proceedings of the meeting will be recorded in the "Second Basin-wide BAP Consultation Report", which will be submitted to ADB for consent on the recommendations.
- 71. **Project-specific BAP.** Consequent upon ADB's concurrence to the proposed changes in the institutional arrangement and BAP Management Committee composition, PD Balakot HPP convened a meeting with the Fisheries and Wildlife departments of the Government of KP on August 3, 2023 at PEDO House Peshawar to finalize various modalities enabling PEDO to enter into the Project-specific BAP implementation agreement(s).
- 72. As result of the meeting, both departments notified their respective focal persons for further interactions with PIU and PMC on the matters pertaining to the Project-specific BAP.
- 73. From October 18 to 20, 2023, the EE of PMC, and Deputy Director EHS and Gender of PIU conducted a field visit with the officials of Wildlife and Fisheries departments in connection with the reconnaissance of field offices identified for the BAP implementation in the Area of Management. In this regard, the Wildlife office identified at Kanshai was visited. However, the facility was found unfeasible for BAP intervention as it is difficult to access and involves entirely new construction of the 2005 earthquake-damaged structure. Also, there is no electric power or water supply to the facility, and the facility was not functional. Alternatively, the SDFO (Wildlife) office in Balakot was also visited, and was found feasible subject to adding room(s). SDFO apprised that his office is already negotiating with the owner of the facility to construct two additional rooms which may be allocated for BAP interventions.
- 74. The Fisheries department identified a facility for BAP interventions, which was visited with the Deputy Director Fisheries Mansehra office, and found feasible as the facility is located on the N-15 road and adjacent to the operational hatchery of the department near Jared village.



Visit with Deputy Director Fisheries to the Facility Identified for BAP near Jared (October 19, 2023)

3.1.4 Establishment of Fish Hatchery

75. Under condition "hh" of the "Environmental Approval" to the EIA report, PEDO will finance construction/establishment of a Fish Hatchery for the provincial government to offset

impact on the fish resources of the Kunhar River. In compliance with the aforesaid condition, on December 6, 2023, PIU and PMC met with the Director General Fisheries Government of KP and his team. It was agreed that a follow up meeting with the PD will be held, while the site identified for establishing the hatchery will subsequently be visited, if accessible in the winter season, to assess its feasibility. Outcome of the proposed meeting and site findings will accordingly be reported in the upcoming SAEMR.



Meeting with Director General Fisheries in connection with Establishment of Fish Hatchery

3.1.5 Annual OHS Training

- 76. Pursuant to the EMP/SSEMP requirements, EPC Contractor arranged the Annual OHS) Training on August 8 and 9, 2023. The two-day training was imparted by professionals of the Rescue 1122 of District Mansehra. The training was participated by relevant staff from PIU, PMC, and the EPC Contractor's HSE staff and supervisors from the work sites, workshop and batching plant, etc.
- 77. On the first day of the training, the Rescue 1122 professionals presented various aspects of OHS, including risks at work site, emergency response, and methods for first aid administration. At the end of presentation, fire extinguishing drills and training on first aid administration were also held at the Adit-02 camp.
- 78. On the second day of the OHS training, field demonstrations were held at Adit-02, and the workshop and batching plant sites wherein drills were undertaken involving emergency response, evacuation, and first aid treatment in case of occurrence of incident(s).
- 79. At the end of the training, certificates were distributed among the participants. Below are photos of the Annual OHS Training.



Presentation on Day 1



First Aid Demonstration at Camp on Day 1



Emergency Response Demonstration at Site on Day 2

3.1.6 Meetings with ADB/AIIB Safeguards Team

- 80. **Meeting with safeguard progress review mission.** From September 13 to 18, 2023, the ADB safeguards team met with PIU, PMC and the EPC Contractor, and undertook Site visit. While Site visit details have been given under subhead "Site Audit", proceedings of the meetings and presentation are synopsized hereafter.
- 81. On September 18, 2023, the EE of PMC presented progress on the Project HSE portfolio with particular emphasis on Project-specific BAP implementation and consultation with the stakeholders of Basin-wide BAP. Various challenges to implementing the Basin-wide BAP were briefly discussed. It was agreed that PIU will submit the findings of the upcoming stakeholder consultation meeting with their recommendations for future course of action for ADB's consent. It was also agreed that various other submissions will be made as per schedule given in the aide memoire.
- 82. **Meeting with ADB safeguards handover mission.** On December 18, 2023, the PIU and PMC jointly delivered HSE portfolio presentation to ADB at PEDO House Peshawar. It was agreed that PIU will submit the following documents by January 15, 2024: (i) Tree Plantation Plan, (ii) Blasting Management Plan, and (iii) updated EIA report.







Presentation to the ADB Safeguard Handing-over Mission (December 18, 2023

3.1.7 Instrumental Environmental Monitoring

- 83. KPEPA certified laboratory, namely Integrated Environment Laboratory conducted quarterly instrumental environmental monitoring for air quality, noise level, water quality, and soil analysis at the locations pinned in the SSEMP where baseline instrumental monitoring was done in December 2022. The third quarter instrumental monitoring was conducted in September/October 2023, while the second quarter monitoring was conducted in December 2023.
- 84. Details of the instrumental environmental monitoring and results have been given under dedicated subhead while signed copies are attached as **Annexure-04**.





Air, Noise Monitoring and Drinking Water Sampling (Spring Water) at Adit-03 (Kholia) Q-3

3.2 Site Audit

- 85. **Table 3.1** exhibits the Site visits undertaken by the EEM, PIU, PMC, EPC Contractor's environmental staff and the ADB Safeguard mission as part of the Site audit. Since the PMC's Health and Safety Monitor visits the Site on almost daily basis, his routine inspection/supervision visits are not reflected herein.
- 86. During these visits, EHS aspects of the construction activities pertaining to permanent access roads, residential colony, camp facilities, batching plants, adit tunnels, and temporary access roads were audited.
- 87. The EEM's observations recorded during his visit on July 18, 2023, and their rectifications are in **Table 3.2**, followed by the photos of the Site audits.

Table 3.1: Site Audit Conducted during the Reporting Period

	Table 3.1: Site Audit Conducted during the Reporting Period							
Visit		litor	Purpose of Audit	Summary of Findings				
Date	Title	Name	•	,				
July 18, 2023	PIU: Deputy Director HSE and Gender	Ibtesaam Zaima	HSE compliance audit of Site and identification of	Although, detail observations have been given in separate table				
	Expert ii. Health and Safety Monitor	i. Assad Ali Khan ii. Fawad Ali Shah	gaps in measures proposed in SSEMP/EMP	however, lack of exhaust facilities in Audit-02 tunnel, and gaps in solid and hazardous waste management were some of the main observations				
	EPC Contractor: i. Environmental	ii. Dr.Abdul Qayyum i. Irshad Saeed ii. Qi Ziu Feng		recorded by the EEM.				
	Manager ii. H & S Manager							
September 14, 2023	i. Principal Energy Specialist (East, Central and West Asia Team) ii. Environmental Specialist - Country Environment Focal Person			No major non-compliance was observed, neither at Site nor at camp except minor housekeeping issues, and generator emission associated with exhaust pipe.				
	PIU: i. Project Director ii. Deputy Director HSE and Gender							
	PMC: EI E, H&S Monitor, DTL and Chief Engineer (D&SW)	i. Assad Ali Khan ii. Syed Ali Fawad Shah iii. Muhammad Hussain iv. Ishtiaq Hussain	HSE compliance audit of construction works at Site					
	EPC Contractor: iii. Environmental Manager i. H&S Manager	iii. Irshad Saeed i. Qi Ziu Feng						
September 25 & 26, 2023		Asad Ali Khan	Site Audit of HSE activities and due-diligence survey	i. Non-availability of requisite medical staff and ambulance.				
	i. Environmental Manager ii. Planning Officer	i. Irshad Saeed ii. Awais Khan	of the sites identified for muck disposal	ii. No latrine facilities at some sites iii. Improper storage of workshop materials iv. Out of the ten (10)				
	PIU: Patwari	Waqar Ahmad		identified sites, only one site was found suitable				
	EPC Contractor: Manager GRC	Muhammad Arif		subject to construction of protection and drainage works while rest were either found unfeasible or required costly access and huge protection works				

Table 3.2: FFM's Observations and their Rectification/Accomplishment Status

					nplishment Status				
S/ No	EEM Observation	Action Taken	Previous Picture	Status	Current Picture				
1	Under the assembly point construction material was placed.	Construction material was removed from the assembly point.		Rectified					
2	Solid waste scattered around the fuel tank.	Solid waste removed, and fuel tank shifted to the site.		Rectified					
3	Engine oil drum placed on the ground without the secondary containment or dip tray.	Engine oil drum shifted to the storage area with secondary containment.		Rectified	7				
4	Opposite to the fuel tanks, staining on the soil was prominent and contaminated the soil.	Staining removed, and contaminated soil discarded in the hazardous waste.		Rectified					
5	Fuel storage not marked and without concrete.	Fuel storage tank removed from the area.		Rectified	7				
6	Mobile oil stored in container with the cotton waste (flammables).	Cotton rugs and waste removed from the container. Container shifted to the site and used for storing the cement bags.		Rectified	-				
7	Solid waste management system did not exist at site.	collection and disposal contract granted to the KDA.		Rectified					
8	Wood used in the kitchen for cooking.	Wood replaced by LPG in the kitchen for cooking purpose.		Rectified					

S/ No	EEM Observation	Action Taken	Previous Picture	Status	Current Picture
9	Three different color-coded waste bins not used to segregate solid waste.	Three different color-coded waste bins provided.		Rectified	
10	Prepare video of the Site orientation.	Site orientation video prepared.		Task accomplished	
11	Environmental awareness slide should add in the site safety induction.	Slide on environmental awareness added to the site safety induction		Task accomplished	Protection of the Environment Librarian III. Librarian III.
12	Suggestion box or stop card should be introduced at Site.	Suggestion box installed.		Task accomplished	
13	Provide copies of NOCs for waste disposal.	KDA issued NOC for waste disposal (copy attached as Annexure-05), while PIU will assist the EPC Contractor in pursuing the application for NOC. NOC is expected to be obtained by		Task partially accomplished	
14	Provide small waste bins in all rooms.	Small waste bins provided in the rooms.		Task accomplished	. 1
15	Shift dispensary to the accessible place for all	Dispensary shifted to accessible place.		Task accomplished	
16	Ensure ventilation, cooling, fridge, chairs and tables in the mess.	The mentioned facilities were provided in the mess hall.		Rectified	
17	Septic tank should have proper vent and there shall be no containers over it	Septic tank area cleared from the containers and marked.		Rectified	

S/ No	EEM Observation	Action Taken	Previous Picture	Status	Current Picture				
	No hard barricade along the Ganhool Nulllah.	Hard barriers constructed.		Rectified					
19	Enclosed generator from three sides.	Generator enclosed from three sides.		Rectified					
20	Check the rain water flow in the batching plant area.	Drainage provided at the Batching Plant area		Rectified					
21	Remove spoil from the Nullah near batching plant.	Spoil removed from the Nallah.		Rectified					
22	Provide proper ventilation and lighting in the Adit- 02 tunnel	Ventilation and lighting provided.		Rectified					
23	Conduct gas test in the tunnel for LEL and other emissions.	Gas test conducted by third party under quarterly instrumental		Task completed					
24	Kitchen effluent should treat before dump in the Nullah.	No action taken yet.		Not rectified	Rectification will be ensured till February 15, 2024				



EEM's Visit to Adit-02 Tunnel Site.



ADB Safeguards Progress Review Mission Site Visit to R-03 (September 14, 2023)



EE's Visit to the Identified Muck Disposal Site at R-03 (September 25, 2023)

3.3 Issues Tracking Based on Non-conformance Notices

- 88. As reported in the previous SAEMR for January to June 2023, out of 47 minor non-compliances, 8 remained open at the end of the reporting period. However, during the current reporting period, among those 8 open issues, 7 were rectified, while the one pertaining to the discharge of kitchen effluent into the Ganhool Nullah remained unresolved which was accordingly included in the issues identified during the current reporting period. As per the EPC Contractor's commitment made in the weekly meeting, this issue will be resolved till February 15, 2024.
- 89. The minor non-compliances recorded during the current reporting period include delayed replacement of damaged personal protective equipment (PPE); issues in warehouse maintenance, and improper stacking of material in the shelves; improper storage and handling of the gas cylinders; performing different activities without barrier and signage; blockage of corridors; garbage burning at site by workers; issues in tunnel drainage system; unavailability of MSDS at chemical storage area; generation of dust due to the vehicles movement on unpaved access roads and dry shotcrete; cooking in the living room by the security staff; intermittent availability of banksman; delays in replacoffing the fire extinguisher, and the EPC Contractor's rectification of HSE issues.
- 90. The status of non-compliances is in **Table 3.3**.

Table 3.3: Tracking of Non-Compliances for the Current and Previous Reporting Periods

Issue	Reporting Period							
issue	January-June 2023	July-December 2023						
Number of open issues	8	5						
Number of closed issues	39	58						
Total number of non-compliances	47	63						
Percentage of issues closed	83%	92%						

- 91. Table 3.3 shows that out of 63 minor non-compliances observed, 58 (92%) were resolved till end of the reporting period, while rectification of the remaining non-compliances is in progress. The issues under observation for rectification or where improvement is needed include arrangement for safe disposal of kitchen effluent, provision of gas test meter at the site, full-time deployment of the PMDC-registered doctor at the camp dispensary, provision of technical craft-wise trainings of the workers, and improvement in inspection regime.
- 92. It is also evident that the number of non-compliances recorded during the current reporting period was more than the previous reporting period. This increase is primarily attributed to the initiation of construction activities at the new sites and deployment of newly hired labors. It is expected that with the increased training frequency and toolbox talks, the level of non-compliances events involving the EPC Contractor's workforce will significantly be reduced.

3.4 Trends

93. There was upward trend in the number of non-compliances recorded from the previous to the current reporting periods. However, the EPC Contractor's capability to resolve the issues has been enhanced which is construed as a positive trend.

3.5 Unanticipated Environmental Impacts or Risks

94. No unanticipated environmental impacts or risks were observed during the reporting period.

4 STATUS OF COMPLIANCE WITH COVENANTS

95. **Table 4.1** exhibits the compliance status of the environmental safeguards-related covenants in the Project Agreement signed on May 21, 2021 between ADB, and KP Province and PEDO.

Table 4.1: Compliance Status with Environmental Covenants³

Table 4.1. Compilation		il Elivirolillelital Covenants					
Covenant	Reference in Project Agreement	Compliance Status					
Procurement. PEDO shall not, award any Works contracts which involves environmental impacts until: (a) Khyber Pakhtunkhwa Environmental Protection Agency (KPEPA)_has granted the final approval of the EIA; and (b) the Borrower has, or has ensured that PEDO has, incorporated the relevant provisions from the EMP and BAP into the Works contract.	Para. 3, page 8	Complied (a) KPEPA granted "Environmental Approval" to the project EIA report on July 6, 2021. (b) The EHS safeguards-related provisions have mainly been incorporated in (i) Volume-01 of 07 (Appendix-9), and (ii) Volume-03 of 07 (GCC and SCC) of the EPC Contract.					
Environment. Khyber Pakhtunkhwa and PEDO shall ensure that the preparation, design, construction, implementation, operation and decommissioning of the Project and all Project facilities comply with (a) all applicable laws and regulations of the Borrower and Khyber Pakhtunkhwa relating to environment, health and safety; (b) the Environmental Safeguards; and (c) all measures and requirements set forth in the EIA, the EMP, the BAP, and any corrective or preventative actions set forth in a Safeguards Monitoring Report.	Para. 5, page 9	Compliance in progress (a) KPKEPA granted "Environmental Approval" to the project EIA report on July 6, 2021. Requisite NOCs, from Forest, Fisheries, Wildlife and Mining & Mineral departments of the government of KP were obtained. (b) SSEMP, based on the EMP, Site data and the project requirement, was approved by the Employer on December 30, 2022. (c) EIA report has been updated to reflect changes in the Project-specific BAP implementation arrangements and composition of BAP Management Committee. On August 11, 2023, the updated EIA report was submitted to the PIU for their review and onward transmission to ADB. Furthermore, consultation on Basin-wide BAP, and various activities under Project specific BAP remained in progress during the reporting period.					
Human and Financial Resources to Implement Safeguards Requirements Khyber Pakhtunkhwa and PEDO shall make available necessary budgetary and human resources to fully implement the EMP, the BAP and the RP.	Para. 9 page 10	Complied. The requisite human and financial resources are available with the PIU, PMC and EPC Contractor. For BAP implementation, budgetary provision exists in the Project PC-1, whereas for the EMP implementation, the EPC Contractor has allocated a lump sum amount in his bid which is also reflected in the EPC Contract.					
Safeguards – Related Provisions in Bidding Documents and Works Contracts. PEDO shall ensure that all bidding documents and contracts for Works contain provisions that require contractors to:	Para. 10, page 10	Compliance in progress The EHS safeguards-related provisions have mainly been incorporated in (i) Volume-01 of 07 (Appendix-9), and (ii) Volume-03 of 07 (GCC and SCC) of the EPC Contract.					

³ Project Agreement for Loan 4057-Pak: Balakot Hydropower Development Project (https://www.adb.org/sites/default/files/project-documents/49055/49055-007-pra-en.pdf)

	Covenant	Reference in Project Agreement	Compliance Status
(d)	comply with the measures relevant to the contractor set forth in the EIA, the EMP, the BAP and the RP (to the extent they concern impacts on affected people during construction), and any corrective or preventative actions set forth in a Safeguards Monitoring Report; make available a budget for all such environmental and social measures; provide the Borrower, Khyber Pakhtunkhwa and PEDO with a written notice of any unanticipated environmental, resettlement or indigenous peoples risks or impacts that arise during construction, implementation or operation of the Project that were not considered in the EIA, the BAP, EMP and the RP; adequately record the condition of roads, agricultural land and other infrastructure prior to starting to transport materials and construction; and reinstate pathways, other local infrastructure, and agricultural land to at least their pre-project condition upon the completion of construction.		 (a) Implementation of SSEMP provisions is in progress at Site for the protection of EHS of the construction crew, community etc. (b) Budgetary provision exists in the EPC Contract for implementation of HSE related mitigation/preventive measures proposed in the SSEMP, EMP, BAP, or those which may be identified in Safeguards Monitoring Reports. (c) So far, no unanticipated risk(s) have been identified, but nevertheless provisions of the covenant, SSEMP, and conditions of contract will strictly be followed if any unforeseen risk is identified. (d) Construction activities were mostly undertaken within the permanent acquired land. Pursuant the EPC Contract provisions, any damage to the private/public property or utilities due to the EPC Contractor's Works will be reinstated/compensated at the EPC Contractor's cost. Nevertheless, the covenant will be taken care of before initiating permanent works at Site. (e) The temporary land acquired by the EPC Contractor for his facilities will be reinstated under the conditions of temporary lease contract(s), and in full compliance with the requirements of the EPC Contract. In this regard, copies of the lease agreements have been made part of the SSEMP.
(b)	Feguards Monitoring and Reporting DO shall: submit semi-annual Safeguards Monitoring Reports to ADB and disclose relevant information from such reports to affected persons promptly upon submission; if any unanticipated environmental and/or social risks and impacts arise during construction, implementation or operation of the Project that were not considered in the EIA, the EMP, the BAP and the RP, promptly inform ADB of the occurrence of such risks or impacts, with detailed description of the event and proposed corrective action plan; no later than the commencement of works by the Works contractor, engage qualified and experienced external experts under a selection process and terms of reference acceptable to ADB, to verify information produced through the Project monitoring process, and facilitate the carrying out of any verification activities by such external experts; no later than the commencement of works by the Works contractor, engage		 Compliance in progress. (a) This is the fifth SAEMR furnished in compliance with the mentioned loan covenant. Previous four reports were disclosed on the ADB website. (b) Till reporting period, no unanticipated environmental risks identified. (c) EEM is onboard since September 2022 whose external environmental monitoring report was approved and disclosed by the ADB. (d) External experts specified in the PAM are onboard in compliance with the covenant provisions. (e) No breach to compliance has occurred so far.

Covenant	Reference in Project Agreement	Compliance Status
external experts to monitor and report upon Project implementation, and facilitate the carrying out of any monitoring activities by such external experts; and (e) report any actual or potential breach of compliance with the measures and requirements set forth in the EMP, the BAP or the RP promptly after becoming aware of the breach.		
Prohibited List of Investments Khyber Pakhtunkhwa and PEDO to ensure, that no proceeds of the Loan are used to finance any activity included in the list of prohibited investment activities provided in Appendix 5 of the Safeguard Policy Statement.	Para. 12, page 11	Complied. Loan proceeds are solely being used for developing the Balakot HPP (300 MW).
Grievance Redress Mechanism Khyber Pakhtunkhwa and PEDO shall ensure that a joint safeguards grievance redress mechanism acceptable to ADB is established and functional in accordance with the provisions of the EIA, the EMP, the BAP and the RP no later than the date of award of the Works contract to consider safeguards complaints.	Paras. 13 and 14, page 11	Complied PEDO has notified the Grievance Redress Mechanism (GRM) contained in the approved EIA for the Balakot HPP (300 MW), which is operational since September 2022. The EPC Contractor's internal GRM has also been notified and is operational since Commencement of Works.
The safeguards grievance redress mechanism referred to in paragraph 13 above will function to: (a) review and document eligible complaints of project stakeholders; (b) proactively address grievances; (c) provide the complainants with notice of the chosen mechanism and/or action; and (d) prepare and make available to ADB upon request periodic reports to summarize (i) the number of complaints received and resolved, (ii) chosen actions, and (iii) final outcomes of the grievances.		The notified GRM is effectively performing the intended functions.
Labor Standards, Health and Safety Khyber Pakhtunkhwa and PEDO shall ensure that the core labor standards and the Borrower's applicable laws and regulations are complied with during Project implementation. Khyber Pakhtunkhwa and PEDO shall include specific provisions in the bidding documents and contracts financed by ADB under the Project requiring that the contractors, among other things: (a) comply with the Borrower's applicable labor law and regulations and incorporate applicable workplace occupational safety norms; (b) do not use child labor; (c) do not discriminate workers in respect of employment and occupation; (d) do not use forced labor;		Compliance in progress. Provisions from Law of the land dealing with labor have appropriately been made part of the EIA report and EPC Contract.

	Covenant	Reference in Project Agreement	Compliance Status
(e) (f)	allow freedom of association and effectively recognize the right to collective bargaining; and disseminate, or engage appropriate service providers to disseminate, information on the risks of sexually transmitted diseases, including HIV/AIDS, to the employees of contractors engaged under the Project and to members of the local communities surrounding the Project area, particularly women.		

5 RESULTS OF ENVIRONMENTAL MONITORING

5.1 Overview of Monitoring Conducted during the Current Period

- 96. The prime objectives of environmental monitoring are to:
 - i monitor project impacts on physical, biological and socio-economic indicators, and assess adequacy of the EMP/SSEMP in identifying and mitigating the project adverse impacts;
 - ii recommend mitigation measures for any unforeseen impact, or where the impact level exceeds from those anticipated in EMP/SSEMP; and
 - iii ensure legal compliance including safety of workforce and community.
- 97. During the project execution, two types of monitoring activities were undertaken.
 - **Compliance Monitoring:** To ensure that mitigation/preventive measures proposed in EMP/SSEMP are adhered to; and
 - ii **Effect Monitoring:** To monitor the effect of construction activities on various components of the environment such as air, water, noise and soil etc.
- 98. Compliance to the specifications and implementation of the mitigation measures proposed in EMP/SSEMP were regularly supervised by the PMC while effect monitoring, covering monitoring of air pollution, noise level, water and soil analysis, were undertaken by the EPC Contractor through hiring of third-party services. It shall be noted that PMC not only supervises field activities of the third-party laboratory, but also regularly reviews their instrumental environmental monitoring reports.
- 99. The instrumental environmental monitoring carried out during the reporting period is detailed in the succeeding paras.

5.2 Instrumental Environmental Monitoring

- 100. As highlighted under sub-head 3.1.7, quarterly instrumental environmental monitoring under the Balakot HPP (300 MW) was carried out by KPEPA-certified laboratory, namely Integrated Environment Laboratory at the locations pinned in the SSEMP. The third quarter monitoring was conducted in October 2023, while the fourth quarter monitoring was undertaken in December 2023.
- 101. The instrumental environmental monitoring points, and the monitoring plan are in **Figure 5.1** and **Table 5.1** respectively.

Hangarai بىگرائى Ghanila Pandher Biari Branch No.1 Drinking Water, Soit, Effluen Phatekka MP-2 Air Noise Power touse Branch No ranch No.3 Shogran Valley Tour Legend MP-3 Air Noise 1.MP-1 Dam Site Kewai Waterfal MP 4 Air, Noise, Barkot 2.MP-2 Adit 1 (Camp) Drinking Water, Kiwan 3.MP-3 Adit 2 (Camp) 4.MP-4 Adit 3 (Camp) مسحد اقصى 5.MP-5 Powerhouse ngar 6.MP-6 Tailrace Upstream Tailrace Tunner 7.MP-7 GRC Camp MP-7 Air Noise River Surface Water 8.MP-8 Colony Area Drinking Water Patarian

Figure 5.1: Instrumental Monitoring Points

Table 5.1: Instrumental Environmental Monitoring Plan

Environmental Quality	Parameters	Standards/ Guidelines	Location	Monitoring Period/Frequency/	Responsibility			
Quanty		Guidennes		Sampling No/Year		Monitoring		
	Pı	re-Construction Phas	е					
Air quality, noise level, water quality (drinking, and surface water of the Kunhar River), soil and effluent	Same as given for construction phase	Same as given for construction phase	Same as shown on map	Once	EPC Contractor	PIU and PMC		
		Construction Phase						
Air quality	SO ₂ , NOx, CO, O ₃ , SPM, PM ₁₀ , PM _{2.5} , humidity, wind direction, wind speed, temperature etc.	Air quality standards by NEQS, WHO	Same as shown on map	Quarterly (24- hour Duration)	EPC Contractor	PIU and PMC		
Dust	Dust control	Air quality standards by NEQS, WHO		Quarterly (24- hour duration)	EPC Contractor	PIU and PMC		
Noise level	dB(A)	Noise pollution control NEQS, WHO		Quarterly (24- hour duration)	EPC Contractor	PIU and PMC		
Water quality	Surface water, temperature, turbidity, pH, TDS, EC, TSS, DO, COD, BOD ₅	Water quality standards by NEQS, WHO		Quarterly	EPC Contractor	PIU and PMC		
	Ground water: color, odor, taste, temperature, turbidity, pH, TDS, EC, TSS, CaCO ₃ , Hardness, potassium, nitrate, nitrite (as NO ₂), phosphate, arsenic, COD, DO, TSS, total <i>coil</i> form, faecal coliform and e. coli	Water quality standard by NEQS, WHO		Quarterly	EPC Contractor	PIU and PMC		
Soil pollution	Soil texture, pH, EC, available phosphorus and SAR.	NEQS, Government of Pakistan		Twice a year	EPC Contractor	PIU and PMC		

102. Comparison of the two quarters of instrumental environmental monitoring results with the baseline results, and NEQS, World Health Organization (WHO), International Finance Corporation, and United States Environmental Protection Agencystandard values (where applicable) are briefly given hereunder. The signed copies of the results are in **Annexure-04**.

5.3 Monitoring of Air, Noise, Water and Soil analysis

5.3.1 Ambient Air Monitoring

a. Particulate Matter Monitoring

103. **Methodology and instrument used.** Ambient particulate matter (PM) monitoring was carried out for assessing PM_{10} and $PM_{2.5}$ concentrations at the pre-identified locations within the Project reach. The Air Quality Monitoring System (AQMS-65) employed for PM_{10} and $PM_{2.5}$ is a fully integrated air monitoring station that delivers 'near reference levels' of performance parameters. With a size of a large suitcase, it can measure up to 20 different gases, particulate pollutants, and environmental parameters simultaneously. The AQMS-65 offers optimal balance between performance and measuring criteria pollutants.

104. **Comparison of results.** Ambient PM₁₀ and PM_{2.5} were monitored for 24 hours at the pre-identified locations as given in **Figure 5.1**. **Figure 5.2** exhibits the intended comparison as expounded in **Figure 5.1**.

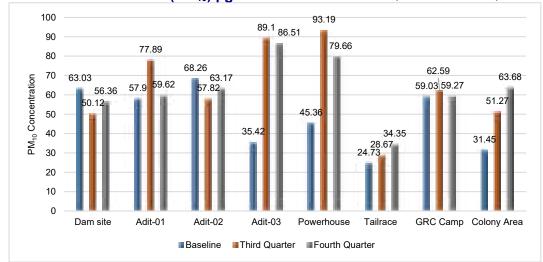


Figure 5.2: Particulate Matter (PM₁₀) μg/m³ Concentrations in Quarter 3 and Quarter 4 2023

NEQS: 150 μg/m³, WHO: 45 μg/m³

105. As evident from the results above, the PM_{10} concentration at most of the sampling points exceeded the WHO guideline values but fell below the NEQS. In fact, during the reporting period, earthwork activities at Adit-01, Powerhouse and Adit-03 caused upward trend in the PM_{10} concentration. Although the increase was primarily attributed to the shotcreting activities at those sites which are essential for slope stabilization, frequent vehicular movement on the unpaved access roads also contributed to this increase. As a mitigation measure, sprinkling frequency on the unpaved roads was increased, while concentration of construction vehicles was minimized during the shotcreting operation.

106. The results obtained for $PM_{2.5}$ shows compliance with the NEQS but exceeds the WHO guideline values at some locations. As evident from **Figure 2.3**, even baseline results recorded at some locations exceeded the WHO guideline values.

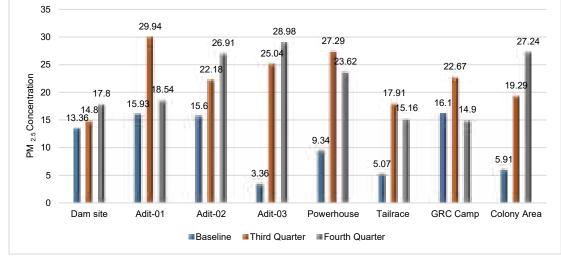


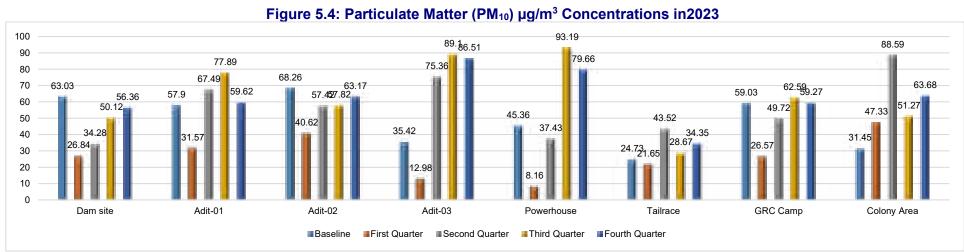
Figure 5.3: Particulate Matter (PM_{2.5}) μg/m³ Concentrations in Quarter 3 and Quarter 4 2023

NEQS: 35 μg/m³, WHO: 15 μg/m³

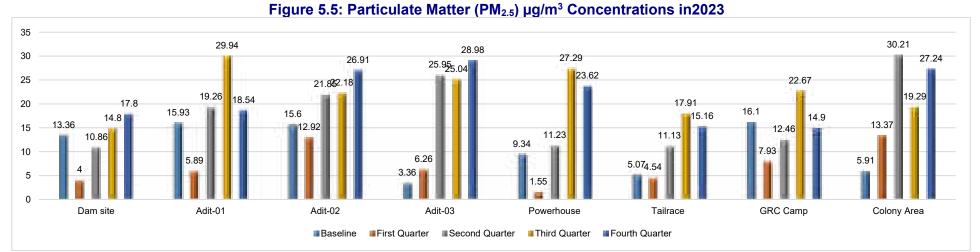
- 107. As expounded under PM_{10} concentration, due to excavation for access roads, land leveling at colony site, and earthwork activities at adit tunnels, the result obtained shows increase in the $PM_{2.5}$ concentration. Although sprinkling of water was regularly being undertaken at these sites, no special mitigation measures other than those specified in the SSEMP were adopted as the concentration was for a short period and below the permissible NEQS guiding values.
- 108. **Figures 5.4 and 5.5** show the overall trend of the PM concentration recorded at the monitored sites during the 2023. during this period, the EPC Contractor mainly undertook earthwork activities involving cutting for roads, and land leveling at colony and adit tunnels sites, upward trends in the PM_{10} and $PM_{2.5}$ concentrations were recorded at sites where construction activities either started or remained in progress.

b. Gas Monitoring

- 109. **Methodology and instrument used.** The ambient gas monitoring was carried out assessing carbon monoxide (CO), sulphur dioxide (SO₂) and nitrogen oxide (NO_x) at the predetermined locations. AQMS-65 was also employed for monitoring.
- 110. **Comparison of results.** The 24-hour ambient gas monitoring for the foregoing gases was carried out during the third and fourth quarters of 2023 at the pre-identified locations in the Project area. Comparison of the results obtained is in **Figure 5.6**.
- 111. The results recorded in both quarters show increase in the CO concentration. The sharp increase compared to the baseline recorded results at adit tunnels and powerhouse sites was due to the concentration of construction machinery and vehicles at these sites as construction activities remained in full swing during the monitoring period. However, the results recorded at the tailrace show consistency because during both quarters there were no activities at the monitoring site. Overall, the recorded results fall well below the NEQS and WHO guideline values.
- 112. As shown in **Figure 5.7**, the NO_x concentration was well below the NEQS and WHO permissible limits. Again, the high concentration was due to the increase in vehicular movement at active construction sites.
- 113. As shown in **Figure 5.8**, the NO_2 concentration in all the quarters fell below the guideline values of NEQS and WHO. The sharp increase at Adit-03 and Powerhouse sites was again due to heavy machinery concentration at these sites.



NEQS: 150 μg/m³, WHO: 45 μg/m³



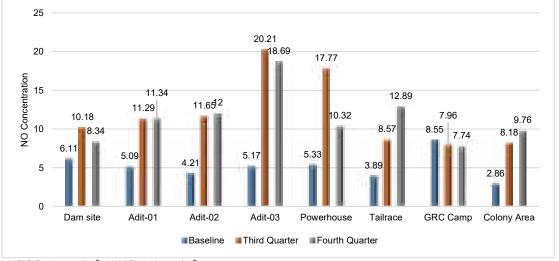
NEQS: $35 \mu g/m^3$, WHO: $15 \mu g/m^3$

0.76 0.8 0.68 0.66 0.7 0.6 0.54 0.52 0.49 CO Concentration 0.47 0.5 0.42 0.37 0.4 0.36 0.26 0.29 0.28 0.26 0.3 0.19 0.2 0.13 0 12 0.12 0.08 0.1 0 Dam site Adit-01 Adit-02 Adit-03 Powerhouse Tailrace **GRC Camp** Colony Area ■Baseline ■Third Quarter ■Fourth Quarter

Figure 5.6: Carbon Monoxide (CO) (mg/m³) Concentrations in Quarter 3 and Quarter 4 2023

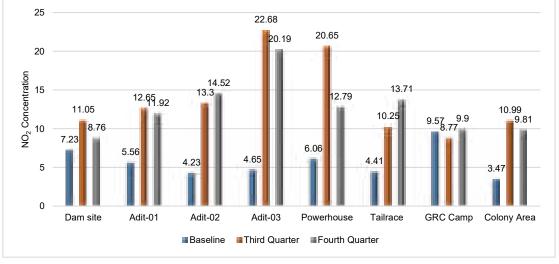
NEQS: 5 mg/m³, WHO: 4 mg/m³





NEQS: 40 mg/m³, WHO: 40 mg/m³

Figure 5.8: Nitrogen Dioxide (NO₂) (µg/m³) Concentrations in Quarter 3 and Quarter 4 2023



NEQS: $80 \mu g/m^3$, WHO: $25 \mu g/m^3$

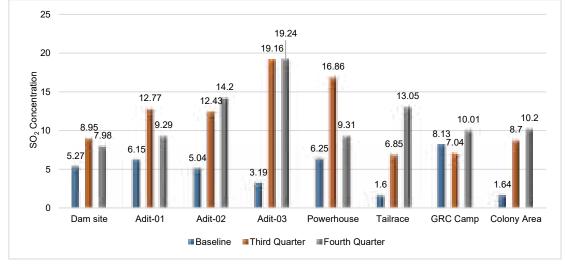


Figure 5.9: Sulfur Dioxide (SO₂) (µg/m³) Concentrations in Quarter 3 and Quarter 4 2023

NEQS: 120 μg/m³, WHO: 40 μg/m³

114. As clearly shown from the SO_2 emissions in **Figure 5.9**, the recorded results fell within the NEQS and WHO guideline values. The increase in concentration was mainly due to the reasons stated under other gaseous emissions.

5.3.2 Noise Monitoring

- 115. **Methodology.** The 24-hour noise level monitoring was carried out at the pre-identified locations as shown in **Figure 5.1**.
- 116. Digital sound level meter with the following specifications was employed during the noise monitoring (i) HME® 9011 Sound Levels Meter, and (ii) IEC651 Type 2 & ANISI.4TYPE2 (Japan). The **features of the equipment** are:
 - Accuracy: ± 1.5 dB (under reference condition)
 - Frequency range: 31.5 Hz to 8.5K Hz
 - Linearity range: 50 dB
 - Measuring level: 30 130 dB(A), 35 130 dB(C)
 - Digital display: 4 digits
 - Resolution: 0.1 dB
 - Display: 0.5 secretary
 - Bar graph: 50 dB scale at 1 dB step for monitoring current sound pressure level display period: 50 mS
- 117. **Comparison of results. Table 5.2 and Figure 5.10** show noise level monitoring results obtained during the instrumental environmental monitoring carried out during the third and fourth quarters of the reporting period. Table 5.2 also compares the two quarters of monitoring results with the baseline monitoring results.
- 118. The 24 hours of results for ambient noise level monitoring show that the recorded noise levels at almost all active construction sites exceeded the NEQS guideline value of 55 decibels (dB). This increase was due to the deployment and operation of heavy construction machinery at those sites.
- 119. Generally, the hourly results indicate that noise levels were higher during working hours, while during the off-working hours, noise levels at the monitored sites fell within the NEQS guideline value of 55 dB. Also, nighttime noise levels are generally consistent and fall within the proximity of the NEQS guiding value of 45 dB.

Table 5.2: Ambient Noise Monitoring Results in Quarter 3 and Quarter 4 2023

									o.z. Allik					Samplin												
S/No	Monitoring	Unit	ı	Dam Site			Adit -01			Adit-02			Adit-03		Powerhouse		e e	Tailra	ce Upsti	ream	GRC Camp		0	Colony Area		a
	Time													Result	s (Leq)											
			Baseline	Third Quarter	Fourth Quarter	Baseline	Third Quarter	Fourth Quarter	Baseline	Third Quarter	Fourth Quarter	Baseline	Third Quarter	Fourth Quarter	Baseline	Third Quarter	Fourth Quarter	Baseline	Third Quarter	Fourth Quarter	Baseline	Third Quarter	Fourth Quarter	Baseline	Third Quarter	Fourth Quarter
1.	9:00 AM		46.70	57.90	60.80	49.60	63.75	61.80	48.10	64.95	62.05	48.00	72.90	68.2	43.80	60.75	55.95	48.10	58.90	57.00	61.00	57.50	58.90	42.50	60.35	67.30
2.	10.00AM		46.50	57.65	60.55	49.40	63.55	61.55	47.90	64.70	61.80	47.80	74.80	70.1	43.60	60.55	55.75	47.90	60.80	58.90	60.80	59.40	60.80	43.60	61.40	69.20
3.	11.00 AM		46.30	57.40	60.30	49.20	63.35	61.30	47.70	64.45	61.55	47.60	75.15	70.45	43.40	60.35	55.55	47.70	61.15	59.25	60.50	59.75	61.15	40.90	58.70	69.55
4.	12.00AM		46.10	57.20	60.10	49.00	63.15	61.10	47.50	64.25	61.35	47.40	71.30	66.6	43.20	60.15	55.35	47.50	57.30	55.40	60.30	55.90	57.30	41.70	59.50	65.70
5.	1:00 PM		45.80	57.00	59.90	48.70	62.90	60.90	47.20	64.05	61.15	47.10	76.65	64.85	42.90	59.85	55.05	47.20	62.65	60.75	60.10	61.25	62.65	45.30	63.15	71.05
6.	2:00 PM		45.60	56.80	59.70	48.50	62.65	60.70	47.00	63.85	60.95	46.90	76.90	67.65	42.70	59.65	54.85	47.00	62.90	61.00	59.90	61.50	62.90	44.20	62.05	71.30
7.	3:00 PM		45.40	56.60	59.50	48.30	62.45	60.50	46.80	63.65	60.75	46.70	76.65	71.95	42.50	59.45	54.65	46.80	62.65	60.75	59.70	61.25	62.65	40.90	58.70	71.05
8.	4:00 PM		45.20	56.35	59.25	48.10	62.25	60.25	46.60	63.40	60.50	46.50	73.90	69.2	42.30	59.25	54.45	46.60	59.90	58.00	59.50	58.50	59.90	43.20	61.00	68.30
9.	5:00 PM		45.00	56.10	59.00	47.90	55.75	60.00	46.40	62.15	59.25	46.30	70.35	65.65	42.10	59.05	54.25	46.40	51.30	49.40	59.20	55.20	51.3	46.40	64.20	64.75
10.	6:00 PM		44.80	55.90	58.80	47.70	55.55	59.80	46.20	61.95	59.05	46.10	52.65	47.95	41.90	45.85	41.05	46.20	55.55	53.65	59.00	59.45	55.55	45.40	51.15	47.05
11.	7:00 PM		44.50	55.70	58.60	47.40	55.30	58.60	45.90	61.75	58.85	45.80	51.10	46.4	41.60	45.55	40.75	45.90	54.00	52.10	58.80	57.90	54.00	48.70	54.40	45.50
12.	8:00 PM	dB(A)	44.30	55.50	58.40	47.20	55.05	58.40	45.70	61.55	58.65	45.60	51.50	46.8	41.40	45.35	40.55	45.70	54.40	52.50	58.60	52.30	54.4	42.40	48.15	45.90
13.	9:00 PM		44.10	55.30	58.20	47.00	54.85	58.20	45.50	61.35	58.45	45.40	53.75	49.05	41.20	45.15	40.35	45.50	56.65	54.75	58.40	54.55	56.65	40.20	45.95	48.15
14.	10.00 PM		43.90	55.05	57.95	46.80	54.65	57.95	45.30	61.10	58.20	45.20	54.45	49.75	41.00	44.95	40.15	45.30	57.35	55.45	58.20	55.25	57.35	44.70	50.40	48.85
15.	11.00 PM		43.70	54.80	57.70	46.60	54.45	57.70	45.10	51.05	48.15	45.00	54.10	49.4	40.80	44.75	39.95	45.10	57.00	55.10	57.90	54.90	57.00	42.10	47.80	48.50
16.	12.00 PM		43.40	54.60	57.50	46.30	54.25	57.50	44.80	50.75	47.85	44.70	56.55	51.85	40.50	44.45	39.65	44.80	59.45	57.55	57.70	57.35	59.45	44.00	49.75	50.95
17.	1:00 AM		43.20	54.40	57.30	46.10	54.05	57.30	44.60	50.55	47.65	44.50	50.85	46.15	40.30	44.25	39.45	44.60	53.75	51.85	57.50	51.65	53.75	46.20	51.90	45.25
18.	2:00 AM		43.00	54.20	57.10	45.90	53.85	57.10	44.40	50.35	47.45	44.30	53.60	48.9	40.10	44.05	39.25	44.40	56.50	54.60	57.30	54.40	56.5	41.70	47.40	48.00
19.	3:00 AM		42.80	54.00	56.90	45.70	53.65	56.90	44.20	50.15	47.25	44.10	54.95	50.25	39.90	43.85	39.05	44.20	57.85	55.95	57.10	55.75	57.85	44.10	49.85	49.35
20.	4:00 AM		42.60	53.75	56.65	45.40	53.40	56.65	44.00	49.90	47.00	43.80	52.80	48.1	39.70	43.60	38.80	44.00	55.70	53.80	56.90	53.60	55.7	42.90	48.60	47.20
21.	5:00 AM		42.30	53.50	56.40	45.20	53.15	56.40	43.70	49.65	46.75	43.60	51.90	47.2	39.40	43.35	38.55	43.70	54.80	52.90	56.60	52.70	54.8	41.00	46.70	46.30
22.	6:00 AM		42.10	53.30	56.20	45.00	52.95	56.20	43.50	49.45	46.55	43.40	53.65	48.95	39.20	43.15	38.35	43.50	56.55	54.65	56.40	54.45	56.55	40.40	46.55	48.05
23.	7:00 AM		41.90	53.10	56.00	44.80	53.60	56.00	43.30	49.25	46.35	43.20	53.35	48.65	39.00	41.60	36.80	43.30	55.65	53.75	56.20	59.10	55.65	44.30	59.20	47.75
24.	8:00 AM		41.70	52.90	55.80	44.60	51.45	55.80	43.10	52.45	49.55	43.00	54.85	50.15	38.80	47.90	43.10	43.10	57.75	55.85	56.00	55.65	57.75	43.30	63.35	49.25
Average	for 24 hrs		44.20	55.38	58.27	47.10	57.08	58.69	45.60	57.78	54.88	45.50	61.19	56.06	41.30	50.29	45.48	45.60	57.52	55.62	58.48	56.64	57.52	43.34	54.59	55.59

NEQS Guideline Values: 45-55 dB⁴, WHO Guideline Value: 70 dB

Leq: Log Equivalent Continuous Sound Level

 $^{^{\}rm 4}$ 45 dB for Night time and 55 dB for Day time.

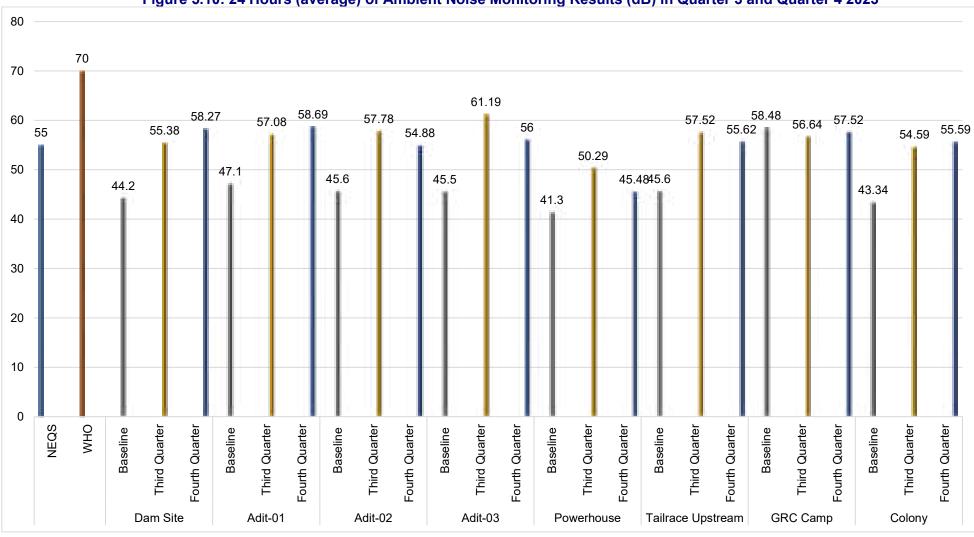


Figure 5.10: 24 Hours (average) of Ambient Noise Monitoring Results (dB) in Quarter 3 and Quarter 4 2023

120. As the noise source was not stationary at the monitored sites and keeping in view the heavy machinery operations, no special arrangements were needed to reduce the noise level to NEQS guiding values. Such measures were neither economical nor significant, particularly when sensitive receptors were not in the immediate vicinity of the active working sites.

5.3.3 Water Monitoring

a. Drinking Water

- 121. **Methodology.** During the reporting period, the drinking water quality tests were conducted at the sample points identified in the map in **Figure 5.1**.
- 122. American Public Health Association standard methods used for the sampling and preservation of water, and analysis. The standard methods of American Water Works Association was also used for analysis.
- 123. Comparison of drinking water results. The two quarters of drinking water monitoring results of the sample points, and their comparison with the baseline results are in **Table 5.3**.
- 124. As evident from the results of the drinking water analysis in the Project area, almost all of the monitored parameters fell within the permissible limits of WHO and the National Standards for Drinking Water Quality (NSDWQ). The minor variation in monitored parameters appears to be due to temperature/seasonal variation as drinking water was mostly extracted from natural streams in the Project area.

b. Comparison of Surface Water Results of the Kunhar River

- 125. For the Kunhar River water monitoring, samples were collected from three locations i.e. Dam site (upstream of temporary diversion dam, just downstream of the Sukki Kinari HPP tailrace), Tailrace upstream (Barkot), and downstream side of the Project residential colony area. The purpose of Kunhar River water monitoring is to know the river water quality at the undisturbed locations, baseline impact of the contributing streams on the river water quality, and the overall impact of the Project construction.
- 126. Due to non-availability of the surface water parameters under NEQS, the Kunhar River water was compared against the NEQS effluent parameters.
- 127. The results obtained from the instrumental environmental monitoring, carried out in the third and fourth quarter of the reporting period, are presented under **Table 5.4**. The results from first and second quarters have also been reproduced from the previous SAEMR for the period from January to June, 2023, so as to assess the Project overall impact at the end of the reporting year.
- 128. As evident from the table, the BOD (5) results obtained at Dam site during the first quarter monitoring, are at higher end in comparison to the results of other monitoring points of the Kunhar River. This appears to be due to the construction pollutant added to the river water by the upstream Project.
- 129. Although the colony and tailrace monitoring sites of the Kunhar River are located in close proximity to each other still, there is a vivid difference in the BOD (5) results obtained at these two sites. The recorded results for tailrace and downstream colony sites in Q-4 are 41.3 and 56.4 mg/l respectively. It is pertinent to mention here that just upstream of the residential colony monitoring point of the Kunhar River, there is a low flow contributing stream, namely Sangar Nullah, on left side of the River. It appears that this stream might have added pollutants to the river causing higher BOD (5) result during the last quarter of the reporting period. In any case, in the upcoming quarterly instrumental monitoring, water of this contributing stream will be analyzed for confirmation.

Environmental Monitoring Report (July-December 2023)

Balakot HPP (300 MW)

Parameter Para	Second Quarter Third Quarter Fourth Quarter 7.61 7.8 7.9 11 8 8 Non-Objectio nable Non Objectio nable 6 4 5 3 2 3.2 379 368 359 338 327 274 1.21 1.13 128 0.55 0.42 0.59 N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
Part	Quarter Quarter Quarter 7.61 7.8 7.9 11 8 8 Non-Objection nable Non Objection nable Objection nable 6 4 5 3 2 3.2 379 368 359 338 327 274 1.21 1.13 128 0.55 0.42 0.59 N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
Part	Quarter Quarter Quarter 7.61 7.8 7.9 11 8 8 Non-Objection nable Non Objection nable Objection nable 6 4 5 3 2 3.2 379 368 359 338 327 274 1.21 1.13 128 0.55 0.42 0.59 N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
Sale 1 - Sal	11 8 8 Non-Objectio nable Non Objectio nable Non Objectio nable 6 4 5 3 2 3.2 379 368 359 338 327 274 1.21 1.13 128 0.55 0.42 0.59 N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
Part	Non-Objectio nable Non Objectio nable Non Objectio nable 6 4 5 3 2 3.2 379 368 359 338 327 274 1.21 1.13 128 0.55 0.42 0.59 N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
No. Column No. N	Objectio nable Objectio nable Objectio nable 6 4 5 3 2 3.2 379 368 359 338 327 274 1.21 1.13 128 0.55 0.42 0.59 N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
Color Colo	3 2 3.2 379 368 359 338 327 274 1.21 1.13 128 0.55 0.42 0.59 N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
G. 1983 S. 100 S.	379 368 359 338 327 274 1.21 1.13 128 0.55 0.42 0.59 N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
6 Solid Conference of Soli	338 327 274 1.21 1.13 128 0.55 0.42 0.59 N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
7. CHO-CHO-CHO MARKEN CONTROL AND	1.21 1.13 128 0.55 0.42 0.59 N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
8. Nover(NO) AMAGES B regt 50 450 22 0.9 1 0.88 0.85 18 2.1 2.3 1.64 1.84 1.80 1.00 1.01 0.84 0.85 0.86 0.09 1.0 0.84 0.85 0.80 1.0 0.84 0.85 0.86 0.87 0.08 0.11 1.85 0.7 2.41 1.2 1.00 1.00 0.87 0.48 1.48 1.44 1.44 1.44 1.44 1.44 1.44 1	0.55 0.42 0.59 N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
10. Application of the control of th	N.D. N.D. N.D. 0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
11. Naket (N) E307-16 mg/l 0.02 s0.02 0.001 0 N.D. N.D. N.D. N.D. N.D. N.D. N.D. N.	0.0019 0.0027 0.0046 N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
Nice	N.D. N.D. N.D. 118 125 145 0.15 0.59 0.52
APHA-SIDI MIGH CALL PRODUCT A CHORNING APHA-SIDI MIGH CALL PRODUCT A CHORNING MIGH CALL PRODUCT A CHORN	118 125 145 0.15 0.59 0.52
13. Chloride (C) APPLA-SOO Proph Color Color APPLA-SOO Proph Color Color APPLA-SOO Proph Color Color APPLA-SOO Proph Color APPLA-SOO Proph Color APPLA-SOO Color APPLA-SOO Proph Color Color APPLA-SOO Proph Color Color APPLA-SOO	0.15 0.59 0.52
14. Chiorine APHA-4500 mg/l	
16. Fluoride APHA-3500 mg/l s.0.2 s0.2 N.D. N.D. N.D. N.D. N.D. N.D. N.D. N.	10 10
17. Aluminium APHA-3500 mg/l	N.D. N.D. N.D.
18. Manganese (Mn) MN-B mg/l 0.5 ≤0.5 N.D. N.D. N.D. N.D. N.D. N.D. N.D. N.	0.62 0.76 0.59
19. Cadmium (Cd) RPHA-3500 (Cd-B mg/l 0.03 0.01 N.D. N.D. N.D. N.D. N.D. N.D. N.D. N.D	N.D. N.D. N.D.
19. (Cd) Cd-B IIIg/I 0.003 0.01 N.D. N.D. N.D. N.D. N.D. N.D. N.D. N.D	N.D. N.D. N.D.
20. Barium (Ba) Ba B mg/l 0.3 0.7 0.16 0.057 0.052 0.049 0.273 0.08 0.12 0.19 0.2 0.23 0.16 0.17 0.16 0.19 0.263 0.11 0.07 0.06 0.07 0.043 0.2 0.18	N.D. N.D. N.D.
	0.23 0.18 0.29
	N.D. N.D. N.D.
22. Copper (Cu) APHA- 3500 Cu-B mg/l 2 2 0.03 0.05 0.02 0.06 N.D. 0.07 0.06 0.072 0.058 0.071 0.04 0.03 0.057 0.035 0.049 N.D. 0.001 N.D. N.D. N.D. N.D. N.D. 0.06 0.02 N.D. N.D. N.D. N.D. N.D. N.D. 0.05 0.06	0.04 0.03 0.05
23. Zinc (Zn) APHA- 3500 Rg/l 3 5 1.01 1.09 1.07 1.14 1.2 1.06 1.09 1.15 1.08 1.1 1.04 1.02 1.09 1.08 1.3 1.21 1.19 1.24 1.03 1.08 1.13 1.08 1.13 1.08 1.13 1.08 1.10 1.10 1.10 1.10 1.10 1.10 1.10	1.07 0.98 0.99
24. Boron (B) APHA 4500 mg/l 0.3 0.3 N.D. N.D. N.D. N.D. N.D. N.D. N.D. N.	N.D. N.D. N.D.
25. Chromium (Cr) cr B mg/l 0.05 ≤0.05 N.D. N.D. N.D. N.D. N.D. N.D. N.D. N.D	N.D. N.D. N.D.
26. Selenium (Se) Se C mg/l 0.01 0.01 N.D. N.D. N.D. N.D. N.D. N.D. N.D. N.D	N.D. N.D. N.D.
27. Cyanide (CN) RPHA 4500- CN Mg/I 0.07 ≤0.05 N.D. N.D. N.D. N.D. N.D. N.D. N.D. N.D	N.D. N.D. N.D.
28. E-Coli APHA:9222 D Number / 100 mL sample	0 0 0
29. Total Coliform APHA:9222 Number /100 ml sample Number / 13 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0

Table 5.4: Surface Water Results of the Kunhar River in 2023

	Table 5.4: Surface Water Results of the Kunhar River in 2023 Sampling Points																			
							Dam Site				5	Tailrace	oints		Colony Area					
S/ No	Parameter	Standard Method	Unit	NEQS			Dain Oite					Results								
					Baseline	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Baseline	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Baseline	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	
1.	Temperature		°C	40	5	7	11	7	5	6	7	13	8	6	4	7	8	11	8	
2.	рН	APHA-4500H+ B		6.5- 8.5	8.3	8.1	7.9	8.1	7.6	7.9	7.7	8.2	8.6	8.2	8.1	8.2	8.4	8.1	8.6	
3.	Chemical Oxygen Demand (COD)	APHA-5220-D	mg/l	150	113	97	84	54	49	108	91.8	86	71	58	86	74.2	71	88	79	
4.	Biological Oxygen Demand (BOD5) at 20 °C	APHA, 5210	mg/l	80	62.8	64.9	61.7	38.5	33.2	54.7	59.3	63.1	50.7	41.3	42	43.7	46.2	62.8	56.4	
5.	Total Dissolved Solids (TDS)	APHA-2540 C	mg/l	3500	2637	2563	2176	1853	1268	2492	2281	2564	2283	1895	1864	1857	1895	2681	1947	
6.	Total Suspended Solids (TSS)	APHA-2540 D	mg/l	200	129	124	96	59	47	108	93	106	123	114	117	126.4	119.7	152.8	133.9	
7.	Total Hardness	APHA-2340 C	mg/l		164	159	142	198	183	157	143	151	167	206	161	151	146	255	238	
8.	Oil and Grease	Separation Method	mg/l	10	2.8	2.4	1.3	0.7	0.4	2	2.07	1.69	1.34	1.04	1.3	1.28	1.23	0.86	0.46	
9.	Chromium (Hexa and Trivalent)	APHA-3500Cr B	mg/l	1	0.61	0.59	0.53	0.28	0.24	0.55	0.51	0.59	0.41	0.35	0.41	0.46	0.37	0.2	0.17	
10.	Total Iron	APHA-3500- Fe-B	mg/l	8	3.8	4.1	3.6	3.1	2.9	3.2	3.04	3.88	3.37	3.26	2.6	2.58	2.51	2.69	2.52	
11.	Chloride	APHA-4500CI- B	mg/l	1000	256	261	254	219	206	234	238	249	195	237	209	216	234	263	249	
12.	Fluoride	APHA-4500F- C	mg/l	10	2.4	3.02	2.97	3.11	2.88	1.8	1.75	1.81	2.1	2.55	1.1	1.19	1.21	1.71	1.68	
13.	Ammonia	ASTM-D1426- 15	mg/l	40	4.9	5.2	5.8	3.5	3.07	3.7	3.6	3.2	3.92	3.41	2.9	3.2	3.4	3.9	4.1	
14.	Cadmium	APHA-3500 Cd-B	mg/l	0.1	0.01	0.009	0	N.D	N.D	0.008	N.D	N.D	N.D	N.D	0.006	N.D	N.D	N.D	N.D	
15.	Lead	APHA-3500-Pb B	mg/l	0.5	0.08	0.04	0.01	N.D	N.D	0.03	0.007	0.005	N.D	N.D	0.01	0.009	0.0079	0.003	0.007	
16.	Arsenic	APHA-3500As B	mg/l	1	N D	N D	N D	N.D	N.D	N D	N D	N.D	N.D	N.D	N D	N D	N.D	N.D	N.D	
17.	Copper	APHA-3500Cu B	mg/l	1	0.27	0.21	0.18	0.24	0.16	N D	N D	N.D	N.D	0.03	N D	N D	N.D	N.D	N.D	
18.	Barium	APHA-3500Ba B	mg/l	1.5	0.07	0.09	0.07	0.09	N.D	0.04	0.02	0.09	0.12	0.08	0.03	0.006	0.0071	0.0052	0.0049	
19.	Selenium	APHA- 3500 Se C	mg/l	0.5	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N D	N.D	N.D	N.D	N.D	
20.	Silver	APHA-3500Ag-B	mg/l	1	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N D	N.D	N.D	N.D	N.D	
21.	Manganese	APHA-3500-Mn B	mg/l	1.5	0.33	0.37	0.34	0.29	0.15	0.28	0.31	0.28	0.37	0.31	0.26	0.24	0.22	0.13	0.16	
22.	Zinc	APHA-3500-Zn B	mg/l	5	0.58	0.64	0.59	0.46	0.39	0.37	0.42	0.46	0.57	0.42	0.31	0.29	0.33	0.47	0.39	
23.	Nickel	ASTM E3047- 16	mg/l	1	0.15	0.12	0.13	0.16	0.09	0.11	0.08	0.09	0.04	0.06	0.08	0.05	0.03	0.008	0.004	
24.	Boron	APHA-4500B-C	mg/l	6	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	
25.	Mercury	APHA-3500 Hg-B	mg/l	0.01	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N D	N.D	N.D	N.D	N.D	
26.	Sulphide (S ⁻²)	APHA-4500 S ₂	mg/l	1	0.35	0.32	0.29	0.33	0.26	0.31	0.28	0.37	0.31	0.37	0.29	0.24	0.16	0.29	0.3	
27.	Sulphate (SO ₄)	APHA-4500- SO ₄ C	mg/l	600	429	425	406	346	271	354	349	356	381	354	349	342	356	345	339	
28.	An Ionic Detergent (as MBAS)		mg/l	20	1.1	1.03	1.01	0.85	0.73	0.9	0.7	1.06	1.13	1.04	0.4	0.6	0.57	0.61	0.54	
29.	Phenolic Compound (as Phenol)	APHA-5530-D	mg/l	0.1	0.06	0.04	0.06	0.03	0.01	0.02	0.01	0.04	0.08	0.06	0.01	0.01	0.013	0.016	0.012	
30.	Cyanide (as CN) total	APHA 4500-CN	mg/l	1	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N.D	N D	N.D	N.D	N.D	N.D	
31.	E-Coli	APHA:9222 D	Number/ 100 ml		Uncountab le	Uncount able	Uncount able	Uncount able	Uncount able	Uncountab le	Uncount able	Uncount able	Uncount able	Uncount able	Uncountab le	Uncount able	Uncount able	Uncount able	Uncountable	
32.	Total Coliform	APHA:9222 B	Number/ 100 ml		Uncountab le	Uncount able	Uncount able	Uncount able	Uncount able	Uncountab le	Uncount able	Uncount able	Uncount able	Uncount able	Uncountab le	Uncount able	Uncount able	Uncount able	Uncountable	

Table 5.5: Soil Analysis Results in 2023

											1 (1))ie 5.5: 3	JOII AII		Points and												
S/No	Parar	meters			Adit-01					Adit-02					Adit-03				(GRC Camp)			Р	owerhouse		
			Baseline	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Baseline	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Baseline	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Baseline	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Baseline	First Quarter	Second Quarter	Third Quarter	
		Sand %	14	13	19	21	26	8	10	13	17	29	17	21	19	23	22	16	15	17	21	19	12	14	16	19	24
		Silt%	57	54	49	53	57	58	53	49	46	40	49	56	53	55	51	43	46	45	49	52	61	59	57	52	33
1	Soil Texture	Clay %	29	33	32	26	17	34	37	38	37	31	34	23	28	22	27	41	39	38	30	29	37	27	27	29	43
	TOXIGIO	Texture Class	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam	Silty Clay Loam					
2	рН		8.1	8.1	8.1	7.9	8.4	8.4	8.1	8.1	8.6	8.1	8.1	8.0	8.0	8.3	8.4	8.0	8.0	8.0	8.1	8	8.1	8.1	8.1	8	8.3
3	Electrical (EC (µSm ^{-/}	Conductivity 1)	238	238	238	245	251	251	238	238	233	239	238	231	231	236	248	231	231	231	236	244	229	229	229	241	256
4	Phosphoru	us (mgkg ⁻¹)	2.01	2.01	2.01	1.98	1.64	1.64	2.01	2.01	2.2	2.47	2.01	3.2	3.2	2.95	2.59	3.2	3.2	3.2	3.81	3.79	2.9	2.9	2.9	2.87	2.8
5	Sodium Ab Ratio	osorption	4.07	4.07	4.07	3.96	3.53	3.53	4.07	4.07	4.18	3.19	4.07	3.54	3.54	3.47	3.24	3.54	3.54	3.54	3.64	3.64	3.37	3.37	3.37	3.33	4.05

μSm⁻¹: Micro siemens/meter mgkg⁻¹: milligram per Kilogram

5.3.4 Soil Analysis

- 130. During the course of quarterly instrumental environmental monitoring, the soil analysis of camps and workshop areas was also carried out to record conditions of the soil at these sites, and track changes resulting from construction activities. Thesewould obligate the EPC Contractor to restore the soil of the facilities to its original condition upon completion of the Project or handing over the site back to the owner(s).
- 131. Comparison of the soil analysis results obtained during the reporting period are in **Table 5.5**. The first and second quarter results have also been given to examine the Project construction activities' effect on the soil quality at the end of the reporting year.
- 132. As evident from the results, there was a gradual increase in the percentage of the sand contents in the soil at almost all of the monitored points, exhibiting increase in construction activities. Other monitored parameters more or less remained the same at all sites.

5.3.5 Trends

- 133. Due to propagation of construction activities, and deployment of heavy construction machinery at Site, increased noise levels and particulate matter concentration were recorded at most of the monitored points. As the EPC Contractor undertook earthwork activities involving cutting of slopes, land leveling for colony areas and access roads, such increase was anticipated. Similarly, at all active construction sites, there was an increase in gaseous emission during the reporting period.
- 134. Despite the quick increase in the primary pollutants, most of the recorded results fell within the acceptable limits of NEQS.
- 135. With opening of the new sites for construction and deployment of heavy machinery, the impact on ambient noise level and air quality was anticipated. However, such increase will be minimized through implementation of mitigation measures specified in the EMP/SSEMP to curtail primary pollutants.





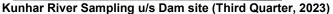
Air and noise monitoring at Dam and Adit-02 Camp (Third and Fourth Quarters, 2023)





Drinking water monitoring-Community and GRC Camp site (Third Quarter 2023)







Soil Sampling at A-02 Camp (Third Quarter, 2023)

5.3.6 Summary of Monitoring Outcomes

- 136. The instrumental environmental monitoring results show that weather conditions, type of construction activities, and deployment of heavy machinery collectively affected the baseline conditions of the Project area. However, the impact is short term associated with the construction period as evident from the comparison between the hourly noise levels and particulate matter concentration results obtained during working and off- working hours.
- 137. As evident from the air monitoring, the increase in gaseous emissions recorded at Site was also caused by the increase in vehicular traffic on N-15 during the tourism season. Almost all of the Project facilities are identified along the N-15 route, and at the left bank of the Kuhar River which runs parallel to the aforementioned route.
- 138. No doubt, construction activities will affect the Project area's air quality and noise levels. However, the impact of tourism on vehicular traffic cannot be ignored.
- 139. To suppress fugitive dust at Site, water sprinkling intensity has significantly been increased, particularly at adit tunnels, and access roads.

5.4 Waste Management

- 140. During the reporting period, the Kaghan Development Authority (KDA) granted NOC to the EPC Contractor to dispose general/kitchen waste at their designated sites. Copy of the NOC is in **Annexure-05**. KDA also supplied waste collection containers at various locations, particularly near camps and workshops. KDA regularly collected waste from these containers, and transported them to the designated sites for further disposal.
- 141. Also, the EPC Contractor designated specific points within the camp for collecting kitchen and domestic waste. These points were clearly marked and easily accessible to camp

occupants and staff. As evident from the picture below, color-coded bins were used to collect solid waste within the camp(s).

142. Moreover, the EPC Contractor committed to promote waste reduction and recycling practices within the camps through actively engaging camp occupants to adopt sustainable practices, such as composting food scraps and recycling materials whenever possible. By raising awareness and providing necessary infrastructure facilities, they strived to create a culture of environmental responsibility among all camp members.





KDA-Supplied Waste Containers and Color-Coded Bins

143. **Tables 5.6 and 5.7** show month-wise and cumulative details of waste generated at camp(s) and sites.

Table 5.6: Solid and Lubricant Waste Generated at Camps and Sites

	100010 0101 00111	a ana Ea	a at Gampo and Oitos		
			Quantity		
S/	Type of Waste	This	Previous		Disposal
No	71	Reporting Period	Reporting Period	Cumulative	
	Plastic waste	17.5 kg	22 kg	39.5 kg	Collected in the KDA supplied waste
1					container and then transported to
					the approved waste disposal site.
2	Used tyres	55 Nos	10 Nos	65 Nos	Stored in junk yard (to be auctioned)
3	Used wooden sheets	0 kg	0 kg	0 kg	Not produced yet
4	Used engine oil	1243 ltr	30 ltr	1273 ltr	Stored in barrels.
5	Biodegradable waste	460 kg	50 kg	510 kg	Through KDA, for further processing
	(vegetables, food etc)				and composting.

Table 5.7: Medical Waste and Sorbents Generated at Camps and Sites

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S/No	Month	Medical Waste (kg)	Contaminated Sorbents (kg)
1	July	0.3	0
2	August	0.2	0
3	September	0.4	0
4	October	0.3	0
5	November	0.5	0
6	December	0.7	0
Total for F	Reporting Period (July-December 2023)	2.4	0
Total for F	Previous Reporting Period (Jan-June 2023)	1.0	0
Cumulativ	e for the Project	3.4	0

144. As evident from **Table 5.6**, compared to the previous reporting period, there was a vivid increase in generated used lubricants and biodegradable waste at camp(s). This indicates the marked increase in initiating/executing construction activities at various sites.

- 145. Although the waste lubricant stored in containers at designated location was mainly used for lubrication of formwork, the surplus was kept in containers for onward selling to the government-approved vendor.
- 146. As expounded above, biodegradable waste generated at camps was collected in large containers provided by KDA from where it was regularly transported to the approved disposal site.
- 147. The medical waste generated at camp(s) was intended to be disposed at the incinerator facility at the district/tehsil hospital. As apprised during the previous reporting period, the EPC Contractor applied for disposal of medical waste to the quarter concerned at the district level. However, despite consistent follow up, the NOCwas yet to be issued. To resolve the issue, PMC and PIU will assist EPC Contractor through requesting the competent authority to issue the NOC at the earliest. With the progress of work, more and more worker will be deployed which may increase medical waste generation. Deputy Director HSE and Gender of PIU and the EPC Contractor's Health and Safety Manager will visit the quarter concerned in the second half of January 2024.
- 148. For the primary treatment of the camp sewage, the EPC Contractor constructed a septic tank wherein sewage was being treated under anaerobic conditions. Also, provision exists for a drain to discharge storm water from the camp.
- 149. As far as safe disposal of hazardous waste is concerned, under the ADB instruction given in a meeting on September 14, 2023 at the EPC Contractor's A-02 Camp, the PMC searched for a government-approved vendor. However, they could not find any in the District Mansehra or elsewhere in the province. The constraint was accordingly intimated to ADB during the safeguard handover Mission on December 18, 2023 at PEDO House, Peshawar. ADBassured its support to find the government-approved vendor from Punjab province, whose contact number will be shared with the PIU/PMC at the earliest.
- 150. No ground water contamination was observed as a consequential effect of the EPC Contractor's waste management aspect of the SSEMP.

5.5 Health and Safety

5.5.1 Community Health and Safety

- 151. During the reporting period, the EPC Contractor undertook a number of initiatives towards the community's health and safety. Utmost efforts were made to construct temporary facilities like camp, batching plant, and workshop at locations isolated from the nearest community to minimize risks associated with such facilities. For example, A-02 camp, batching plant, workshop and magazine at Ganhool Nullah, and GRC camp at Sangar village have been constructed in complete isolation from the community. All these facilities have dedicated approach roads guarded by the Special Security Unit.
- 152. Before starting construction activities, particularly at the residential colony and dam sites, the EPC Contractor held consultations with the nearby community wherein the Project layout, nature of activities and machinery to be deployed were discussed in detail. Information dissemination regarding Project activities, associated risks, and safety arrangements was the prime objective of such consultations.
- 153. To maintain privacy of the houses near the construction sites, green shade nets were provided to locals on demand.
- 154. The unpaved access roads used by the Contractor's vehicles were sprinkled to suppress dust, and protect general commuters from the related impacts. The sections of katcha tracks exposed to excess particulate matter concentration were particularly sprinkled

more frequently. For example, the access road (R-03) to colony and powerhouse, and access road to Adit-03 were regularly sprinkled to suppress dust emanating from the heavy machinery movement. However, there were isolated instances where particulate matters exceeded the allowable limits during application of shotcrete to strengthen the loose slopes and land leveling for roads and colony.

- 155. Although construction activities were carried out during nighttime, such activities did not create nuisance to the locals as they were mainly undertaken inside adit tunnels.
- 156. Throughout the construction sites, warning signs/messages in English and Urdu languages were displayed at appropriate locations. Also, flagmen were deployed at the access roads off taking from N-15.
- 157. Camps, workshops, batching plants and work areas were cordoned off with gates and fences to prohibit unauthorized entry to these facilities.



Green sheds provided as part of the EPC Contractor's initiative to protect cultural norms

5.5.2 Workers Health and Safety

- 158. PPE were provided to all workers while Site supervisors ensured their proper use.
- 159. To encourage workers to regularly follow safety protocols and implement safety measures at works site, champion programs were regularly held whereby cash awards were distributed . Usually, three skilled/unskilled labor/staff from the EPC Contractor's workforce who regularly followed safety protocols and encouraged other staff to do so were selected as HSE champions of the month.



Prize Distribution under HSE Champion Program (July 2023)

- 160. For the construction workers, the EPC Contractor conducted trainings on safety issues with practical demonstration of response to any emergency.
- 161. Before starting the work, toolbox talks on HSE-related issues were regularly held.
- 162. The EPC Contractor arranged Annual OHS training on August 8 and 9, 2023 at the Project Site. The two-day training imparted by professionals of the Rescue 1122 of District Mansehra was participated by relevant staff from PIU, PMC and the EPC Contractor's HSE staff and supervisors from work sites, workshop and batching plant, etc.
- 163. During the reporting period, First Aid Box was provided for any incident/emergency situation. First Aid Boxes were made available at all work sites.
- 164. To respond to fire outbreak, fire extinguishers were made available at the camps, batching plants and laboratory/offices, etc.
- 165. After repeated instructions and followups, the EPC Contractor supplied clean drinking water to the workers both at the camps and sites. As exhibited by the environmental monitoring results, drinking water complied with the NSDWQ. Also, the EPC Contractor's camps were equipped with all basic necessities, like accommodation, dining halls, sanitation, and games.
- 166. Under the provisions of the EPC contract, medical dispensary was provided at the camp (although not fully equipped) where the EPC Contractor ensured round-the-clock presence of a medical practitioner. The medical practitioner maintained stock and record of medicines received and used, patient named, and typed of diseases etc.
- 167. **Table 5.8** exhibits month-wise patient records and types of common diseases treated at the dispensary.
- 168. Although the medical dispensary is not fully equipped (EPC Contractor is yet to hire a full-time PMDC-registered doctor), the medical practitioner administered medicines to patients suffering from common headache, vomiting, or stomach pain, etc. As evident from the record, during the reporting period, two patients were referred to the DHQ and THQ hospital Balakot for further treatment. The EPC Contractor fully assisted the patients in availing medical treatment from each hospital.
- 169. The types of illnesses reported by the patients included flu, fever, vomiting, headache, and stomach pain etc.

Table 5.8: Patient Records for the Current Reporting Period

S/No	Description	July	Aug	Sep	Oct	Nov	Dec
1	Number of patients treated at Camp Medical Facility	66	120	192	233	199	255
2	Number of patients referred to DHQ Hospital, THQ Balakot	0	0	0	1	0	1
	Type of illness	Stomach pain			Flu, F	ever	Cough, skin rashes
3		Sore throat	V	omiting	3	Abdominal pain	fever
]		Flu and cough		Ну	/perte	nsion	flu
					Hea	adache	

170. Also, Table 5.8 shows that due to the increase in the EPC Contractor's workforce, more and more patients availed of the services of the dispensary with each passing month.

5.6 Implementation Status of Environmental Management Plan

171. **Table 5.9** shows the implementation status of the pre-construction and construction phase mitigation measures in the disclosed EIA report of the Project, while implementation status of corrective actions proposed in the previous monitoring period was given separately.

Table 5.9: Implementation Status of EMP (Pre-construction and Construction Phases)

		ole 5.9: Implementation Status of EMP (F	re-co	nstructi	on and Construction Phases)	
S/No	Impact	EMP Requirements Mitigation Measures		oliance ained	Comment on Reasons for Partial or Non-Compliance	Required Action and Target Dates to Achieve Compliance
		Pre-Construc	tion P	hase		
	Terrestrial habitat loss caused by construction	Minimize disturbance to, or movement of, soil and vegetation	Yes			
	related activities	Minimize project footprint.	Yes			
1		Retain as much natural vegetation as possible.	Yes			
		Locate construction facilities based on a knowledge of the soil.	Yes			
		slope and vegetation cover of the area to avoid disturbance to the natural environment	Yes			
	Decline in abundance and diversity of	Locate vehicle yards away from open soils and top soil stockyard	Yes			
	terrestrial flora and fauna caused by	Maximize use of locally-sourced aggregate and borrow material	Yes			
2	construction related activities	Minimize contact of non-local aggregate and borrow material with native soil.	Yes			
		Minimize disturbance to, or movement of, soil and vegetation.	Yes			
3	Blasting may pose a health hazard due to flying debris	A minimum buffer of 500 m should be provided between the settlements and point of blasting.	Yes			
4	Construction activities may be cause alterations to groundwater flow patterns	Record location of the springs especially those in areas proximal to where the underground headrace tunnel will be closer to the ground level		Partial	EPC Contractor submitted Hydrocensus Report in November 2023. The PMC review comments are yet to be addressed by the Contractor.	Final Hydro-census Report submission by January 20, 2024 .
5	Use of local water resources for construction activities may reduce the water	Prepare a Water Sourcing and Abstraction Plan specifying the source, owner, total yield, current usage, allowable quantity and the duration for which water can be obtained.	Yes ⁵			

⁵ Water source permission(s) and other details annexed to the SSEMP.

		EMP Requirements	Comr	liance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
	availability for the local communities.	To the extent possible avoid, and where unavoidable, minimize the use of water from local sources (springs) for the Project where local abstraction is unavoidable	Yes			
		Undertake an assessment of the local source identifying its total yield and current usage. If the abstraction from a single source extends three months, the assessment shall be repeated	Yes			
		Fix the allowable quantity to not more than 50% of the available yield (total yield minus current usage)	Yes			
		Enter into a formal agreement with the owner for the water source (or government if it is a public source)	Yes			
	Increase in ambient noise levels due to	Use visual alarms in preference to audible alarms.	Yes			
6	operation of construction equipment, movement of construction traffic and blasting may create nuisance for nearby	Locate noisy equipment behind parking lots, parks or behind sound barriers or sound absorbers – for example, gravel stockpiles or constructed barriers. and away from potential sources of conflict	Yes			
	communities and visiting tourists.	Using vibratory piling instead of impact piling. Erect earth mounds around the site boundary can provide acoustic as well as visual screening	Yes Yes			
7	Failure of spoil dumping sites resulting in increased erosion and sediment load entering river	Dumping sites should have a flood prevention design for a 20- year flood		Partial	In response to the EPC Contractor's report containing sites identified for muck disposal, the PMC EE undertook due diligence of the identified sites in September 2023. Consequently, out of 10 identified sites, only one	The EPC Contractor hired services of NESPAK Consultant for identification of suitable muck disposal sites. NESPAK has undertaken field visits while report
					site was found suitable subject to construction of protection and	containing new sites will be submitted to the PMC

		EMP Requirements	Com	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ained	Partial or Non-Compliance	Target Dates to Achieve Compliance
					drainage works while rest were either found unfeasible or required costly access and huge protection works.	for review by January 25 , 2024 .
		Preparation of spoil management plan	Yes			
	Permanent impact in aesthetics due to	Develop and implement a Site Rehabilitation and Landscaping Plan	Yes			
0	proposed developments	Use colors that better integrate with the landscape	Yes			
8		Disguise elements with vegetation where possible	Yes			
		Retain as much natural vegetation as possible	Yes			
9	Improved accessibility due to construction of Project internal roads	Consult communities during final design and location of site access roads	Yes			
	Increase in congestion, due to increased traffic	Make roundabouts for the congestion points.	Yes			
10	volume will cause delays	Retain as much natural vegetation as possible to reduce the impact of smoke due to vehicles.	Yes			
		Consult National Highway Authority for implementation of the above measures	Yes			
11	Loss of assets and livelihood as a result of land acquired for the Project	LARP implementation		Partial	LARP implementation is in progress.	
12	Submergence of the graveyard	Plaster the graves with mud or cement.		No	LARP implementation is in progress. The affected community and the district administration have not yet decided whether to shift the graves or not or when to shift the graves. In this regard, a committee has been notified (notification attached as	

		EMP Requirements	Comr	liance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
					Annexure-06) comprising of community representatives, representatives from district administration and the Balakot HPP (300 MW), with the mandate to resolve the matter align with religious and local acceptable.	
		If relocation of the graveyard cannot be avoided, it shall be managed through the local religious authorities.		No	Same as above.	Same as above
13	Impact of climate change in possible enhancing of flood impacts such as during possible overtopping of spillway	Ensure minimal damage to dam structure from small amount of overtopping of spillway through design	Yes			
		Constructi	on Pha	se		
1	Construction Impacts	SSEMP exhibiting areas to be cleared, vegetated areas to be protected or fenced, slopes to be stabilized and solid waste disposal locations.	Yes			
	Improvement of the river ecosystem through implementation of the BAP	Implement BAP		Partial	The works related measures have been taken by the EPC Contractor while for the protection measures in the	Signing of contract and field activities will be initiated after the Bank concurrence to the
2	Loss of riverine ecosystem due to inundation by Project Reservoir Degradation of the river ecosystem in the low flow segment downstream of the Project dam				Area of Management, focal persons have been notified by both the departments while field office for fisheries department has been identified. The SDFO (Wildlife) Balakot office has been proposed for the Wildlife protection activities.	updated EIA report (See Corrective Action Plan).

		EMP Requirements	Comr	liance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
	Degradation of the River Ecosystem Downstream of the Tailrace Terrestrial habitat loss caused by construction related activities.		W. 6		EIA report has been updated to reflect changes in the BAP implementation arrangement and BAP Management Committee composition.	
	Terrestrial habitat loss caused by construction related activities.	Provide awareness training to staff and contractors on: prevention of injury of animals; identification of likely species found on site; identifications of animal hazards (such as venomous snakes); and what to do if dangerous animals are encountered	Yes ⁶			
		Solid waste should only be disposed of at designated sites and a Waste Management Plan developed and implemented.	Yes			
3		Prepare an Environmental Training Plan that contains awareness training to staff and contractors on: prevention of injury of animals; identification of likely species found on site; identifications of animal hazards (such as venomous snakes); and what to do if dangerous animals are encountered. Also see guidelines for the Environmental Training Plan in IR 5	Yes			
		Encourage personnel to report sightings of wildlife of conservation importance or incidents of poaching to PEDO	Yes			
		Minimize disturbance to, or movement of, soil and vegetation	Yes			
		Prevent soil damage and erosion				
		Prevent Alien Invasive Species (AIS) establishment on exposed stored soil (do not store bare soil near known sources of AIS).	Yes			

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⁶ Annual OHS held on August 8 and 9, 2023

		EMP Requirements	Comr	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
		The habitat most at risk is the Riparian Habitat. The species that are highest risk include Parthenium Weed, Common Weed and Castor Oil Plant				
		Train and raise awareness regarding AIS among Project staff and contractors				
		Retain as much natural vegetation as possible				
		Solid waste should only be disposed of at designated sites	Yes			
		Minimize the project footprint, clearly delineate and restrict access beyond work sites and other areas to be disturbed				
		Within the quarry and borrow areas, activities will be restricted to areas at a distance from perennial water channels so as to avoid disturbances to them including the risk of siltation	Yes			
	Decline in abundance and diversity of terrestrial	Large flood lights should not be installed outside 50 m of the Project fence.	Yes			
	flora and fauna caused by construction related	Lights should be directed towards Project facilities and not towards the natural habitats.	Yes			
	activities.	Regulations for Project staff and contractors to avoid illegal poaching to be incorporated in contract documents	Yes			
4		Provide awareness training to staff and contractors on: prevention of injury of animals; identification of likely species found on site; identifications of animal hazards (such as venomous snakes); and what to do if dangerous animals are encountered.	Yes			
		Incorporate regulations for Project staff and contractors to avoid illegal poaching in contract documents	Yes			

		EMP Requirements	Comi	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ained	Partial or Non-Compliance	Target Dates to Achieve Compliance
		Provide adequate knowledge to the workers on relevant government regulations and punishments for illegal poaching.	Yes			
		Encourage personnel to report sightings of wildlife of conservation importance or incidents of poaching to PEDO	Yes			
		Project staff and contractors to report kills of large mammals particularly designated species of conservation concern	Yes			
		Train and raise awareness regarding AIS among Project staff and contractors	Yes			
		 The Contractor shall prepare an Environmental Training Plan for all construction workers: the Plan shall address the following items: All Contractor's employees shall be required to comply with environmental protection procedures and they shall be able to provide evidence that they attended the training sessions detailed in the Plan; The Plan shall educate all construction workers on the following issues but not limited to them: fire arm possession, traffic regulations, illegal logging and collection of non-timber forestry products, non-disturbance of resettlement communities, hunting and fishing restrictions, waste management, erosion control, health and safety issues, all prohibited activities, the Code of Conduct requirements and disciplinary procedures, and general information on the environment in which they will be working and living Proposed methods for conducting the training program, which shall include formal 				

		EMP Requirements	Comi	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ained	Partial or Non-Compliance	Target Dates to Achieve Compliance
		newsletters, signs in construction and camp areas and 'tool box' meetings				
		Equipment emitting excessive noise in comparison with other similar equipment will not be allowed to operate	Yes			
		Equipment under use will be regularly maintained, tuned, and provided with mufflers to minimize noise levels.	Yes			
		Equipment in poor state of maintenance, particularly without effective noise control will be checked to determine if it can be improved, and replaced with less noisy equipment as soon as practicable	Yes			
		Blowing of horn will be prohibited on all sensitive areas except under emergency conditions	Yes			
		Compensatory trees will be planted. The EPC Contractor will plant a minimum of ten trees for each tree removed in acquired land. PEDO will monitor and maintain the vegetation until it is established.		Partial	The EPC Contractor prepared Tree Plantation Plan (TPP) and submitted to the PMC for review. The revised submission, updated in light of the PMC review comments, is under review.	Reviewed TPP will be submitted by January 14 , 2024 to PIU for further review and onward submission to the relevant quarters at ADB.
	Increase in ambient and ground level	Develop and implement an Air Pollution Control Plan	Yes ⁷			
5	concentration of air pollutants from construction activities and vehicular movement may cause health	Prepare a SSEMP (see Section 9.5.3) for each construction site and must outline areas to be cleared, vegetated areas to be protected or fenced, solid waste disposal locations, and sprinkling locations				
	impacts to the community.	Fugitive and exhaust emissions from transport vehicles:	Yes			

⁷ Air pollution plan is part of the SSEMP.

Impact Mitigation Measures	Compliance	Comment on Reasons for	
	Attained	Partial or Non-Compliance	Target Dates to Achieve Compliance
 Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer). Install and maintain all vehicles and machinery with appropriate emission control equipment. Regularly maintain vehicles and equipment to keep emissions in check. Smoke from internal combustion engines should not be visible for more than ten seconds. To the extent possible, use new and low emission equipment and vehicles. Purchase best quality fuel and lubes and where possible use lead free oil and lubes. Sprinkle water on all unsealed roads used by Project vehicles that are within 200 m of any settlement. Cover loads and long-term piles of friable material to reduce fugitive dust emission. Reduce traffic speeds on all unpaved surfaces to 15 miles per hour or less. Paved roads shall be swept frequently if soil material has been carried onto adjacent paved, public thoroughfares from the Project site. Install wheel washers where vehicle exit onto paved road from unpaved. Wheel washing of vehicles leaving the site. Wash vehicles/equipment prior to each trip. Use catalytic converters on vehicles, an emission control device, used to convert 			

		EMP Requirements	Comi	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ained	Partial or Non-Compliance	Target Dates to Achieve Compliance
		e.g. it converts the nitrogen oxides back into nitrogen and oxygen.Appropriate maintenance of vehicles and machinery				
		 Fugitive dust emissions from blasting Indicate the limits of a clearing land with highly visible markers. Leave a layer of about 5 m of undisturbed softs above the top of the overburden blasts. This will act as a blanket to contain air blast, dust and fly rock. Sprinkle water on the area where blasting is done to settle down the particulate matter emissions. 	Yes ⁸			
		 Fugitive dust emissions from quarry areas Indicate the limits of a clearing land with highly visible markers. Avoid earth stripping or moving in periods of dry and windy weather. Carry out dust generating activities where maximum protection can be obtained through topography or in areas where prevailing winds will blow dust away from sensitive areas/uses. Water spraying of conveyors/conveyor transfer points, stockpiles and roads. Covering of fine dry loads or spraying of loads prior to exiting the site, and if necessary regular cleaning of public roads in the vicinity of the entrance. 	Yes ⁹			
		Fugitive dust emissions from concrete batching plants	Yes			

⁸ The Headrace tunnel blasting operation has not yet been started however, the site-specific mitigation measures are included in the SSEMP. Need based sprinkling done to prevent fugitive dust emission.

⁹ Construction materials are being supplied from the government approved sources which are located outside of the Project area.

		EMP Requirements	Compliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures	Attained	Partial or Non-Compliance	Target Dates to Achieve Compliance
		 Suspend earthwork operation when wind speed exceeds 20 km/hr. in areas within 500 m of any settlement. The whole process of weighing and mixing would be performed in a fully enclosed environment. The mixers would all equip with dust collectors, no dust emission would be expected. Siting the concrete batching plant out of prevailing high winds minimizing dust emissions. The prevailing wind direction should be considered to ensure that bunkers and conveyors are sited in the leeward direction to minimize the effects of the wind. The provision of natural or artificial wind barriers – such as trees, fences and landforms – to help control the emission of dust from the plant should be considered. Batching plants should be sited on land that is not flood prone. Batching plant should be kept as near to natural sinks to minimize emissions to ambient environment All stacks to be vertical and at least 3 m above ground 			
		 Fugitive dust emissions from aggregate production and handling system Suspend operation when wind speed exceeds 20 km/hr. in areas within 500 m of any settlement. The prevailing wind direction should be considered to ensure that aggregate handling systems located in the leeward 	Yes		

		EMP Requirements	Comr	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
		 direction to minimize the effects of the wind. Sprinkle water on all exposed surfaces, particularly those close and up-wind of settlements. 				
		 Wind-blown dust from exposed surfaces such as bare land and waste dumping sites Cover all exposed surfaces, particularly those close and up-wind of settlements. All grading operations on a project should be suspended when winds exceed 20 miles per hour. Minimize disturbance to, or movement of, soil and vegetation. Sprinkle water on all exposed surfaces, particularly those close and up-wind of settlements. Retain as much natural vegetation as possible 				
		 Wind-blown dust from stockpiles of dusty materials such as sand and other minerals On-site dirt piles or other stockpiled PM should be covered, wind breaks installed and water and/or soil stabilizers employed to reduce wind-blown dust emissions. Adequately wet, cover with plastic, or provide with wind shield all stockpiles to reduce dust emission. Sprinkle water on all exposed surfaces, particularly those close and up-wind of settlements. Minimize disturbance to, or movement of, soil and vegetation. Prevent soil damage and erosion. Retain as much natural vegetation as possible 	Yes			

		EMP Requirements	Comr	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures	-	ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
	Vibration from blasting during the construction phase may disturb local communities.	Develop a Blasting and Explosives Management Plan and Vibration Monitoring Plan.		Partial	In December 2023, the EPC Contractor submitted Blasting Management Plan (BMP) for the PMC review.PMC traded review comments whereby EPC Contractor re submitted the updated BMP which is under review.	Reviewed BMP will be submitted by January 14 , 2024 to PIU for further review and onward submission to the relevant quarters at ADB.
6		 Conduct a pre-construction survey of structures at risk of vibration impacts households. In the initial stages, the blasting induced vibration shall be measured as a function of maximum instantaneous charge and distance from the blasting site. This data shall be then used to refine the Blasting Induced Vibration Risk Zones on the basis of the adopted criteria. Using, the refined Blasting Induced Vibration Risk Zones maps and the tunnel boring schedule, the Supervision Consultant in consultation with the PEDO and the Construction Contractor, shall identify the houses that will be affected and the impact duration and schedule. For the houses that will fall in the Structural Damage Risk Zone, a temporary relocation plan will be developed. An amendment to the Land Acquisition and Resettlement Plan (LARP) will be commissioned for this purpose. Before start of blasting, all residents of houses in the Structural 		Partial 10	 The aspect termed as partial because blasting operation has not initiated yet, nevertheless, the houses/infrastructure falling within the ROW have already been accounted for compensation under LARP. The potentially affected housed/infrastructure falling in the blasting impact zone and outside of the ROW will be surveyed after approval of method statement. 	

¹⁰ Survey will be conducted for marking the potentially affected houses/infrastructure falling in blasting impact zone.

		EMP Requirements	Compliance	Comment on Reasons for	Required Action and	
S/No	Impact	Mitigation Measures	Attained	Partial or Non-Compliance	Target Dates to Achieve Compliance	
		Damage Risk Zone will be relocated as per the LARP. A survey will be undertaken in both zones, to determine the pre-blasting conditions of the buildings. The survey will be commissioned by the Supervision Consultant and will identify and record any existing damage to the structures. The survey will cover the following aspects: Overall condition of the structures, both exterior and interior. Documentation of defects observed in the structure using digital imagery along with notes, measurements and sketches. Documentation of pre-existing cracks using digital imagery along with notes, measurements and sketches.				
		Following completion of the blasting, the survey will be repeated in the Structural Damage Risk Zone to determine the condition of the buildings and verify that they are safe for re-occupation. If the buildings are safe, the residents will be allowed to return to their houses following any necessary damage repairs. If the buildings are damaged beyond repair, compensation will be paid to the owners as per the LARP. If there are any claims or reports of damage in the Cosmetic Damage Risk Zone, the affected house will be surveyed against the pre-Project survey	No ¹¹			

¹¹ Not due for initiation.

		EMP Requirements	Comi	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ained	Partial or Non-Compliance	Target Dates to Achieve Compliance
		and repairs will be undertaken as appropriate.				
		Meaningful contact with the community shall be maintained and their grievance shall be attended to in a timely manner. In this regard:	Yes			
		Develop a Vibration Monitoring Plan that will include monitoring of vibration levels and frequency around the blasting sites. The objectives of the monitoring will be to:				
7	Blasting may pose a health hazard due to flying debris.	A minimum buffer of 500 m should be provided between the settlements and point of blasting.	Yes			

		EMP Requirements	Complian	ce Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures	Attained		Target Dates to Achieve Compliance
		Leave a layer of about 5 m of undisturbed softs above the top of the overburden blasts. This will act as a blanket to contain air blast, dust and fly rock.	Yes		
		Ensure that the holes are correctly collared with respect to the back-break/inclination of the face and also that digging alongside the initiation face well controlled.	Yes		
		Inadequate forward displacement of the front row burden arising out of the under charging of these holes will result in fly rock from vertical catering of the rear holes	Yes		
		Where fly rock possesses a serious problem, the stemming length should not be less than the whole burden. Also, an effective stemming material like crushed angular rock should be used to prevent premature venting of explosion gases through the stemming column.	Yes		
		The forward fly rock could be fairly controlled to the commonly used 'inline open loop' pattern. The maximum inter-row delay interval consistent with the absence of cut off helped in minimizing the fly rock formation. As a thumb rule an inter-row delay of 4-8ms/m of burden could be used for this purpose.	Yes		
		Adequate care should be taken while connecting the delay devices in the holes/rows and the initiation sequence properly checked before firing to avoid initiation of blast holes out of sequence.	Yes		
		Blasts designed on a face length to width ratio in the range of 3 to 4 produces minimum fly rock.	Yes		

		EMP Requirements	Comi	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
	passage of springs due to blasting for tunnels may	Record location of the springs especially those in areas proximal to where the underground headrace tunnel will be closer to the ground level i.e. high risk areas.		Partial	EPC Contractor submitted Hydro-census Report in the month of November, 2023. The PMC review comments are yet to be addressed by the Contractor.	Final Hydro-census Report submission by January 20, 2024.
8		Monitor flow for located springs and maintain records.		Partial	Same as above	Same as above
		Support the community in development of alternate water supply schemes through local NGOs		Partial	Same as above	Same as above
		Ensure the availability of water to the communities and the access of the communities to the water resources being used by them is not adversely affected.	Yes			
	Use of local water resources for	Develop a Water Sourcing and Abstraction Plan	Yes			
	construction activities may reduce the water availability for the local communities.	Source water for construction from authorized abstraction sources agreed between the local communities, local government and EPC contractor.	Yes			
		Water conservation techniques will be developed and implemented by the EPC contractor.	Yes			
9		Access of community to water sources shall be kept clear so that the community's ability to meet its water requirements are not compromised.	Yes			
		Exercise care while moving heavy machinery to avoid damage or blockage of natural waterways and channels.	Yes			
		Maintain records of water usage in all Project activities.	Yes			
		Incorporate the above measures in the Construction SSEMP	Yes			

		EMP Requirements	Comi	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
	construction activities	Develop and implement a Water Quality Management Plan	Yes	5 " 1		
	the contamination of soil, groundwater and surface	Prepare and implement a Spill Prevention and Response Plan and inducted to the staff for any incident of spill.		Partial	There were some incidents of spillages which however, rectified after the PMC instructions.	
	water.	Provide and use spill prevention trays at refueling locations.	Yes			
		The run off from maintenance workshops will be collected by impervious channels and be passed through oil water separators (OWS) before final disposal. The sludge and oil collected at the OWS will be disposed of properly.		No	 i. Grease trap is part of the EPC Contractor washing yard. As EPC Contractor has not scheduled washing yard hence, grease trap is also pending. ii. Also, the Contractor has not decided yet, whether to construct washing yard or not. 	
10		Build separate impervious pits (with concrete walls and proper shed) at the construction sites for temporary handling and storage of contaminated soil and water if encountered during construction such as sludge from OWS.		Partial	The PMC review comments on the sedimentation tank design document have been sent to the EPC Contractor's for updation of the document as the document submitted was deficient of the design parameters considered for design of sedimentation tank.	Revised submission is expected by January 30 , 2024 .
		Keep all fuel storage tanks and lubricating oil drums in secondary containment impervious pits with impervious shed walls.	Yes			
		Avoid on-site maintenance of construction vehicles and equipment, as far as possible.	Yes			
		Regularly inspect construction vehicles and equipment to detect leakages.	Yes			
		Store fuels and lubricants in covered and dyked areas, underlain with impervious lining.	Yes			
		Spill control kits (shovels, plastic bags and absorbent materials) will be available near fuel and oil storage areas, vehicle parking, and	Yes			

		EMP Requirements	Comr	liance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures	-	ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
		vehicle maintenance areas as well as at construction sites.				
		Remove contaminated soil from the site and dispose in a manner to ensure protection of water sources.	Yes			
		Construct the bottom of any soak pit or septic tank at least 100 meters away from springs and water bores.	Yes			
		Maintain records of spills and volume of removed contaminated soil.	Yes			
		Maintain record of remedial measures taken.	Yes			
		Use silt traps to prevent contamination of river and streams.		Partial	The PMC review comments on the sedimentation tank design document have been sent to the EPC Contractor's for updation of the document as the document submitted was deficient of the design parameters considered for design of sedimentation tank.	Revised submission is expected by January 30 , 2024 .
		Incorporate the above measures in the Construction SSEMP	Yes			
	Increase in ambient	Develop a Noise and Vibration Control Plan	Yes ¹²			
11	noise levels due to operation of construction equipment, movement of construction traffic and blasting may create nuisance for nearby communities and visiting tourists.	 Noise generated from construction sites from construction activities. Select the quietest available plant and equipment that can economically undertake the work required. Undertake maintenance of the equipment as simple maintenance can reduce noise levels by as much as 50%. Parts may become loose, creating more noise because of improper operation or scraping 	Yes ¹³			

Noise and Vibration plans are part of the approved SSEMP.The mitigation measures have largely been implied at sites.

		EMP Requirements	Compliar	100	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures	Attaine		Partial or Non-Compliance	Target Dates to Achieve Compliance
		 against other parts. Grinding noises may also occur as the result of inadequate lubrication. Equipment under use will be regularly maintained, tuned, and provided with mufflers to minimize noise levels. Use visual alarms in preference to audible alarms. Enclose noisy equipment. Provide noise attenuation screens, where appropriate. Build an enclosure around the noise source so that noise is contained. The enclosure should be free from gaps and made of dense material and be lined with noise-absorbing material like glass or polyester batts. Locate noisy equipment behind parking lots or parks. Close liaison with the community and regular monitoring of the noise levels in the community are key to successfully implementation of the above mitigation measures. Specifically, inform communities of all major construction activities three days in advance. 				
		 Construction noise from traffic Fit and maintain appropriate mufflers on earth-moving and other vehicles on the site. Mobile plants such as excavators, front-end loaders and other diesel-engine equipment should be fitted with residential class mufflers and other silencing equipment, as applicable. 	Yes			

		EMP Requirements	Compliance Attained		Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures			Partial or Non-Compliance	Target Dates to Achieve Compliance
		 Haul roads within the site should have as low a gradient as possible, and paving should be considered if practicable where noise-sensitive receptors are likely to be affected; Owners and operators of existing facilities should implement special noise reduction measures, such as erecting purpose-built acoustic barriers, restricting opening hours and maintaining transport vehicle 				
		Construction noise from on-site plant	Yes			
		 Operations and equipment All fixed plant at the work sites will be appropriately selected, and where necessary, fitted with silencers, acoustical enclosures and other noise attenuation measures. Modify the equipment or the work area to make it quieter by substituting existing equipment with quieter equipment; retrofitting existing equipment with damping materials, mufflers, or enclosures; erecting barriers; and maintenance. Shift to a quieter construction process for example pile driving is very loud as compared to boring which is a much quieter way to do the same work. Combine noisy operations to occur in the same time period. The total noise level produced will not be significantly greater than the level produced if the operations were performed separately. All plant and equipment should be regularly maintained. Move static plant and equipment as far as possible from sensitive boundaries, as 				

		EMP Requirements	Compliance		Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
		 work allows. A distance of four times further away lowers the noise by 12 dBA. A reduction of 10 dBA will sound half as loud. Sound attenuation measures should be used for plant and equipment such as baffles and specialized mufflers, acoustic enclosures or partial enclosure housings. Acoustic barriers need to be designed and purpose built if needed. Vegetated buffer zones can also be planted to mitigate noise from operations using suitably selected native plantings local to the area. Reduce workers' exposure to high noise levels by keeping moving workers away from the noise source; restricting access to areas; rotating workers performing noisy tasks; and shutting down noisy equipment when not needed. Use earplugs to reduce workers' exposure to high noise levels. 				
		Noise generated from the blasting in quarry areas. • Using vibratory piling instead of impact piling. • Conveyor belts and crushing/screening equipment can be housed to provide acoustic screening. • It is important that sound-reduction equipment fitted to machinery is used and maintained properly. • Erect earth mounds around the site boundary can provide acoustic as well as visual screening.	Yes ¹⁴			

¹⁴ Construction materials are being supplied from the government approved sources which are located outside of the Project area

		EMP Requirements	Compliance Attained		Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures			Partial or Non-Compliance	Target Dates to Achieve Compliance
		Soft ground (e.g. grassland and cultivated fields) attenuation can sometimes have a greater impact in reducing noise than barrier attenuation, especially if the ground supports sound absorbing vegetation.				
		 Noise emissions from concrete batching Locate noisy equipment away from potential sources of conflict. Locate noisy equipment behind sound barriers or sound absorbers – for example, gravel stockpiles or constructed barriers. Install silencing devices to all pressure operated equipment 	Yes			
	a result of accidental	Prepare a Spill Prevention and Response Plan and induct to the staff for any incident of spill.	Yes ¹⁵			
	and lubricants can	Appropriately mark fuel tanks by content and store in dyked areas with an extra 10% of the storage capacity of the fuel tank. The area will be lined with an impervious base.				
12		Install grease traps on the site, wherever needed, to prevent flow of oily water.		No	The grease trap is not available	Grease trap will be constructed as part of the washing yard.EPC Contractor has not scheduled construction of Washing yard yet.
		Spill cleaning kit (shovels, plastic bags and absorbent materials) will be available near fuel and oil storage areas.	Yes			
		Carry cleanup kits in all fuel trucks.	Yes		-	
		Fueling should only take place over impermeable surfaces, other hazmat should	Yes			

 $^{^{\}rm 15}$ The requisite plan is included in the approved SSEMP.

		EMP Requirements	Compliance		Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures	Attained		Partial or Non-Compliance	Target Dates to Achieve Compliance
		be stored and used over impermeable surfaces.				
		The bottom of any soak pit or septic tank shall be at least 10 m above the groundwater table. The distance can be reduced, based on the soil properties, if it is established that distance will not result in contamination of groundwater.	Yes			
		Develop an Erosion Control Plan.	Yes			
	and other construction	Limit vegetation loss to demarcated construction area.	Yes			
		Cover areas such as muck disposal area, batching plant, labor camp and quarry sites after the closure shall with grass and shrubs.		No ¹⁶		
		Adopt slope stabilization measures such as adequate vertical and horizontal drains, drainage along roadsides, cross drainage and retaining walls.	Yes			
12	season.	Monitor slope movements around excavation work areas.	Yes			
13		Salvage, store, and reuse all topsoil at all construction sites.	Yes ¹⁷			
		The height of the stockpile will be minimized to the extent possible by increasing the size of the land for the stockpile.	Yes			
		Topsoil will be carefully stripped to ensure that it is not mixed with subsoil.	Yes			
		The stockpiles will be revegetated to minimize loss of soil quality, minimizing weed infestation, maintaining soil organic matter levels, maintaining soil structure and microbial activity.	Yes			

The closure phase has not been reached yet.
 As most of the temporary facilities have either been identified on the barren land or on mountainous land hence, this and the subsequent mitigation measures are so-far not applicable. The compliance status of these mitigation measures has however been termed "Yes" exhibiting such measures have indirectly been complied.

		EMP Requirements	Compliance		Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
		Topsoil stockpiles will be clearly signposted for easy identification and to avoid any inadvertent losses.	Yes			
		The establishment of declared plants on the stockpiles will also be monitored and control programs implemented as required.	Yes			
		The topsoil will be treated with temporary soil stabilization and erosion control measures.	Yes			
		During removal of topsoil stockpile for restoration of project affected areas, it is preferred that the soil is removed in layers (less than 0.5 m thick) under a gradual process.	Yes			
		The top layer will be mixed with the remainder of the stockpile to ensure that living organisms are distributed throughout the topsoil material at the time of final placement. The use of micro-organism inoculates may be necessary to re-establish micro-organisms in topsoil material.	Yes			
		Select local species for plantation to restore the biodiversity of the area in consultation with Forest Department after completion of respective activities.	Yes			
	Failure of spoil dumping sites resulting in	Dumping sites should have a flood prevention design for a 20-year flood.	Yes			
14	increased erosion and sediment load entering river	The water drainage works consist of the masonry structures, and shall be designed to drain a 5-year rainfall every 10 minutes.	Yes			
		Where constructed tailing hold structure will be of galvanized woven wire mesh gabions	Yes			
		All dumping sites will undergo vegetation restoration works comprising of surface	Yes ¹⁸			

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¹⁸ All dumping sites will be rehabilitated under the terms of lease agreements while, where applicable, plantation will be undertaken on the dumping sites.

	EMP Requirements			liance	Comment on Reasons for	Required Action and	
S/No	Impact	Mitigation Measures	Attained		Partial or Non-Compliance	Target Dates to Achieve Compliance	
		leveling, covering and forest/grass planting or agricultural land rehabilitation					
		 Develop a Spoil Disposal Plan that includes the following measures: Slope movements will be monitored around excavation work areas. Restore to the maximum extent possible the hydrological regime and reinstate natural drainage of the land (including provisions to maintain the water balance of the site and protect from flooding where appropriate). Reinstate topsoil (in case it was stripped before construction activities). Revegetate sites with suitable native plant species. Drain spoil piles to prevent the concentration of flow and to prevent rill and gully erosion. Separate organic material (e.g., roots, stumps) from the dirt fill and store separately. Place this material in long-term, upland storage sites, as it cannot be used for fill. Store "clean" material in a short-term disposal site (stockpile) if it will likely be reused for fill or shoulder widening projects. Where feasible, recycle asphalt material in embankments and shoulder backing. Place these materials where they will not enter the stream system. Asphalt that is 5 years old is considered "inert" (that is, all oils 	Yes ¹⁹				

¹⁹ Spoil disposal plan is included in the approved SSEMP.

		EMP Requirements	Compliance	Comment on Reasons for	Required Action and Target Dates to Achieve Compliance
S/No	Impact	Mitigation Measures	Attained	Partial or Non-Compliance	
		 Do not add excess unusable material to permanently closed sites. Spread material not to be re-used in compacted layers, generally conforming to the local topography. Design the final disposal site reclamation topography to minimize the discharge of concentrated surface water and sediment off the site and into nearby watercourses. Cover the compacted surfaces with a 6-inch layer of organic or fine-grained soil, if feasible. After placement of the soil layer, track walk the slopes perpendicular to the contour to stabilize the soil until vegetation is established. Track walking creates indentations that trap seed and decrease erosion of the reclaimed surfaces. (See figure on next page.). Revegetate the disposal site with a mix of native plant species. Cover the seeded and planted areas with straw compost, mulched with straw at a rate of 1 to 1 ½ tons per acre. Apply jute netting or similar erosion control fabric on slopes greater than 1:2 if site is erosive. Locate stockpiles away from drainage lines, at least 10 meters away from natural waterways and where they will be least susceptible to wind erosion. Ensure that stockpiles and batters are designed with slopes no greater than 1:2 (vertical\ horizontal). Besides these measures, erosion can also be minimized by regular rehabilitation of areas not in use for Project activities during 			

		EMP Requirements	Compliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures	Attained	Partial or Non-Compliance	Target Dates to Achieve Compliance
		construction. These will include: Regrading and immediate re-vegetation (using fast-growing species and different functional groups of plants for keeping soil in place) of slopes to minimize erosion. Install erosion and sediment control measures, if possible before construction commences. Identify drainage lines and install control measures to handle predicted storm-water and sediment loads generated in the mini-catchment. Design and install appropriate erosion and sediment run-off control measures appropriate to site conditions to handle a one-in-two-year storm event (two-year ARI with intensity of six hours), for temporary structures, and a one-in-fifty year storm event, for permanent structures. Establish an adequate inspection, maintenance and cleaning program for sediment run-off control structures. Ensure that contingency plans are in place for unusual storm events. Continually assess the effectiveness of sediment control measures and make necessary improvements. Keep temporary disposal sites out of wetlands, adjacent riparian corridors, and ordinary high-water areas as well as high risk zones, such as 100-year floodplain and unstable slopes. Anticipate sufficient storage area with no risk for sediment delivery for piles that may slump. Stress cracks indicate that the pile is at risk of slumping.			

		EMP Requirements	Comi	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ained	Partial or Non-Compliance	Target Dates to Achieve Compliance
		Cover the trucks that will be used for the transportation of spoil material to disposal sites.				·
	Deterioration of aesthetics and visual	Minimize disturbance to, or movement of, soil and vegetation.	Yes			
	amenity of nearby receptors due to construction activities,	Back fill to original levels.		No	Mitigation measures will be applied upon completion of activities at site(s).	
15	including vehicular movement on roads,	Reshaping to match in with surrounding topography.	Yes			
	may cause disturbance in aesthetics for tourists, businesses and nearby communities.	Reinstate vegetation around construction sites.		No	Implementation of tree plantation plan has not been started yet.	As per tree plantation plan schedule, implementation of tree plantation will be initiated in the first quarter of 2024.
	Permanent impact in aesthetics due to proposed developments.	Develop and implement a Site Rehabilitation and Landscaping Plan.	Yes			
40		Use colors that better integrate with the landscape.	Yes			
16		Disguise elements with vegetation where possible.	Yes			
		Retain as much natural vegetation as possible.	Yes			
	Increase in congestion, due to increased traffic	Develop and implement a Traffic Management Plan.	Yes			
	volume will cause delays.	Make roundabouts for the congestion points.	Yes			
17	uelays.	Retain as much natural vegetation as possible to reduce the impact of smoke due to vehicles.	Yes			
		The vehicles going on the spoil routes and passing through the communities must be completely covered to avoid dust emissions.		Partial	Vehicles loaded with construction materials are generally covered however, some of the vehicles were observed without cover	EPC Contractor has been instructed to immediately cover materials loaded on transportation vehicles.

		EMP Requirements	Compliance		Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ined	Partial or Non-Compliance	Target Dates to Achieve Compliance
					hence, the aspect termed as partial.	
		Strictly implement speed limits and defensive driving policies.				
	Increase in traffic volume will deteriorate the air	Keep speeds slow (30 km/hr) on unsealed roads.	Yes			
	quality.	Sprinkle water on unsealed roads that are used for construction traffic.	Yes			
		Retain as much natural vegetation as possible to reduce the impact of smoke due to vehicles.	Yes			
18		The vehicles going on the spoil routes and passing through the communities must be completely covered to avoid dust emissions.		Partial	Same as above.	
		Strictly implement speed limits and defensive driving policies.	Yes			
		Promptly and properly repair and maintain roads that are subject to damage by Project activities.	Yes			
	Increased risk to community safety due to	Develop and implement a Traffic Management Plan.	Yes			
	increased traffic volume during the construction	Identify suitable times to transport equipment.	Yes ²⁰			
19	phase near communities.	Road safety awareness education will also be included during community visits or information sessions, so that communities can be familiarized with common road signs and the types of vehicles and equipment that will be moving through the area	Yes			
		Keep speeds slow (30 km/hr) where there is traffic exchange between roads.	Yes			
		Make roundabouts for the congestion points.	Yes			

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²⁰ Only day time transportation is undertaken

		EMP Requirements	Comi	oliance	Comment on Reasons for	Required Action and
S/No	Impact	Mitigation Measures		ained	Partial or Non-Compliance	Target Dates to Achieve Compliance
		Designate traffic wardens at roads on the transport route to manage traffic during school hours.	Yes			
		Construction traffic will not travel during school starting and ending hours on designated road segments in front of schools on the transport route.	Yes			
		Strictly implement speed limits and defensive driving policies.				
20	Degradation of the pavement due to use by heavy construction traffic	Maintain vehicles especially brakes. Promptly and properly repair and maintain roads that are subject to damage by Project activities.				
21	Direct, indirect and induced employment at the local levels, resulting in increased prosperity and wellbeing due to higher and stable incomes of people.	 Enhancement measures: ensure preferential recruitment of local candidates provided they have the required skills and qualifications. include an assessment of the contractor's demonstrated commitment to domestic and local procurement and local hiring in the tender evaluation process. coordinate recruitment efforts related to non-skilled labor, including for non-skilled labor positions required by contractors. 	Yes			
		Good practice measures: • determine what is considered to be 'fair and transparent' in recruitment and in distribution of jobs between different community groups, in consultation with local communities and their leaders.	Yes			
22	Increase in the stock of skilled human capital due to transfer of knowledge and skill under the Project resulting in enhanced	Support a 'Vocational Training Program' to assist local people to qualify for semi-skilled positions focusing on issues such as procurement, involvement of vulnerable groups in Project opportunities and continual professional development of staff.		Partial	Vocational training institute and potential candidates for the trainings have been identified however, admission in the institute is still pending at the EPC Contractor's end.	Admission are expected to commence in the first quarter of 2024. As EPC Contractor failed to achieve two milestones set in 2023, hence, the

		EMP Requirements	Compliance		Comment on Reasons for	Required Action and Target Dates to Achieve Compliance
S/No	Impact	Mitigation Measures		ained	Partial or Non-Compliance	
	productivity of the local labor.					equivalent amount on prorate basis will be deducted from the Contract Cost under Item No. 5 "Environmental Mitigation Cost" of Schedule 4 of the EPC Contract.
		Assist local people having practical skills but lacking qualifications to obtain their certificates and thus increase their employment opportunities.	Yes			
		Support initiatives promoting a culture of learning in local communities.	Yes			
		Plan and implement training program for vulnerable groups to encourage their participation in economic opportunities created by the Project.	Yes			
		Assist employees and local communities to improve basic personal financial life skills through training and awareness campaigns, respectively.				
		Consider further training programs to prepare retrenched workers to seek employment in sectors not related to dam construction.	Yes			
23	Increase in recreational and subsistence fishing due to increase in catch of fish following creation of favorable habitats for the fish in the Kunhar River.	Implementation of the BAP		Partial	The works related measures have been taken by the EPC Contractor while for the protection measures in the Area of Management, focal persons have been notified by both the departments while field office for fisheries department has been identified. The SDFO (Wildlife) Balakot office has been	Signing of contract and field activities will be initiated after grant of the Bank concurrence to the updated EIA report.(See Corrective Action Plan)

		EMP Requirements	Compliance		Comment on Reasons for	Required Action and	
S/No	Impact	Mitigation Measures		ined	Partial or Non-Compliance	Target Dates to Achieve Compliance	
					proposed for the Wildlife protection activities. • EIA report has been updated to reflect changes in the BAP implementation arrangement and BAP Management Committee composition.		
24	Loss of income from sand and gravel mining due to change in pattern of sediment deposition following construction of the dam.	Sediment Mining and Management Guidelines are prepared and will be implemented as a part of the BAP, which will identify possible sand and gravel mining spots along the Kunhar River to meet community needs without harming the river ecology.	Yes				
25	Increase in population due to in-migration of job seekers (in-migrants) leading to pressure on existing social infrastructure and services in the Study	Development of a Grievance Redressal Mechanism Encourage local communities to use the grievance procedure for concerns related to deterioration of local services.	Yes Yes				
20		Support local government in the implementation of infrastructure projects.	Yes				
	Area.	Support NGOs specializing in development of infrastructure to assist local government.	Yes				
26	Disputes over distribution of Project employment within and between Study Area inhabitants and the inmigrants resulting in social unrest.	 Implement PEDO Stakeholder Engagement Plan including: maintaining regular communication with local communities and other stakeholders to minimize tensions arising from Project activities; maintaining a grievance procedure, and encourage and facilitate stakeholders to use the mechanism to express concerns; and providing sufficient resources to the community relations officers to enable them to monitor negative perceptions and 	Yes				

	EMP Requirements			oliance	Comment on Reasons for	Required Action and	
S/No	Impact	Mitigation Measures		ained	Partial or Non-Compliance	Target Dates to Achieve Compliance	
		associated tensions, and to address them in a timely fashion.					
27	Potential social unrest in the Study Area due to conflicting socio-cultural norms amongst the inhabitants and inmigrants.	Plaster the graves with mud or cement.		No	The affected community and the district administration have not yet decided whether to shift the graves or not or when to shift the graves. In this regard, a committee has been notified (notification attached as Annexure-06) comprising of community representatives, representatives from district administration and the Balakot HPP (300 MW), with the mandate to resolve the matter align with religious and local acceptable norms.		
		If relocation of the graveyard cannot be avoided, it shall be managed through the local religious authorities.	Yes				

5.7 Trainings

- 172. **Annual OHS training.** Pursuant to the EMP/SSEMP requirements, the EPC Contractor arranged the Annual OHS training on August 8 and 09, 2023 at the Project Site. The two-ay training was imparted by professionals of the Rescue 1122 of District Mansehra. The training was participated by relevant staff from PIU, PMC and the EPC Contractor's HSE staff and supervisors from the work sites, workshop and batching plant, etc.
- 173. On the first day of the training, the Rescue 1122 professionals presented various aspects of OHS, including risks at work site, emergency response, and first aid administration. At the end of the presentation, fire extinguishing drills and training on first aid administration were also held at the Adit-02 camp.
- 174. On the second day of the OHS training, field demonstrations were held at Adit-02, and workshop and batching plant sites wherein drills were undertaken involving emergency response, evacuation and first aid treatment in case of occurrence of incident(s).
- 175. At the end of the training, certificates were distributed among the participants.
- 176. **Training on HSE report writing.** To help and support the EPC Contractor in preping HSE periodic reports, the PMC EE trained the EPC Contractor's HSE team on August 7, 2023 at Adit-02 Camp. During the session, the EE of PMC apprised participants about requirements of the HSE periodic reports, its structure and other various essentials.



EPC Contractor's HSE Team Training on Report Writing

5.8 Complaints

- 177. The Divisional Forest Officer (DFO), Kunhar Watershed Division Mansehra's complaint regarding damages to the trees at access road R-03 was handled jointly by the PIU, PMC, and EPC Contractor. Several meetings among the stakeholders were held, while the DFO visited the Site on June 24, 2023.
- 178. As a result of the above, the DFO withdrew his complaint, and requested the PD Balakot HPP (300 MW) to direct the GRC, JV partner of the EPC Contractor, to take all precautionary measures to avoid damages to the plantation under the Billion Tree Tsunami drive. The DFO's letter to the PD is in **Annexure-07**.
- 179. **Table 5.10** exhibits details of the complaint and its current status.

rable of the Botaine of Bridge Complaint Recontrol daring the Reporting Fortour							
Details of		Received			Actions (to be)	Posolution	
Complaint	Complainant*	Through*	By whom**	Date	taken with the target date	Status***	
Damage to the	DFO, Kunhar	Letter	PIU	January	As described	Resolved	
Plantation Site:	Watershed			18, 2023	under paras		
Damages to the	Division,				177 and 178		
trees falling in the	Mansehra.						
Access Road R-							
03 caused by the							
EPC Contractor's							
earthworks							

Table 5.10: Details of DFO's Complaint Received during the Reporting Period

6 FUNCTIONING OF THE SSEMP

6.1 SSEMP Review

- 180. Generally, the SSEMP serve the intended purpose of mitigating/minimizing risks associated with the construction activities.
- 181. Various plans contained in the SSEMP, like the Erosion and Sediment Control Plan, Pollution Prevention Plan, Waste Management Plan, Instrumental Environmental Monitoring Plan, and Health and Safety Plan were satisfactorily implemented by the EPC Contractor. During the reporting period, the Blasting Management and Tree Plantation plans in the SSEMP were updated, made more Site-specific, and furnished as standalone documents. These documents will be submitted to the PIU on or before January 14, 2024 for review and onward transmission to the ADB.
- 182. Although there were instances of minor non-compliances at Adit-02 and access road R-03 sites, by and large, the EPC Contractor complied with the SSEMP provisions regarding health and safety aspects of the Project. The minor non-compliances observed include issues in storage of materials; safe disposal of effluent from adit tunnels; generation of dust due to the Project vehicles' movement on unpaved access roads, particularly at R-03; lack of exhaust emission monitoring equipment in adit tunnels; and the EPC Contractor's delayed submission of periodic reports. These minor non-compliances were largely rectified through persistent follow-ups, regular meetings with the EPC Contractor's HSE staff; induction trainings; annual OHS training; and regular toolbox talks, and other trainings for the EPC Contractor's workforce.
- 183. Non-initiation of Vocational training and hiring of full-time PMDC register doctor for the medical dispensary at the camp are the two major non-compliances which the EPC Contractor failed to rectify during the reporting period. However, the EPC Contractor committed to comply in January 2024.
- 184. Although there was no need to revise or amend the approved SSEMP, as stated above, the Blasting Management and Tree Plantation plans in the SSEMP were updated as standalone documents. As the SSEMP is construed to be a live document, when the need arises, the same will be updated as per site conditions, and intimated to ADB/AIIB.

^{*}Resident, NGO (nongovernmental organization) etc.

^{**}Verbally, letter, complaint box, email, etc.

^{***}EP Contractor, PMC or PEDO/Energy and Power Department, Government of KP

^{****}Open or closed (if closed, include date)

7 GOOD PRACTICE AND OPPORTUNITY FOR IMPROVEMENT

7.1 Good Practice

185. The EPC Contractor's consultation with the local area community, and provision of jobs for them created a good working environment at Site. As exhibited under **Figure 2.10**, more than 50% of the EPC Contractor's workforce come from the Project area. This is very essential for smooth execution of works at Site, and elimination of unwarranted stoppages by the affected community.

186. To preserve the local norms and cultural values, the EPC Contractor provided veils (green shade nets) to the houses in the immediate vicinity of the work area. As evident from the picture below, the EPC Contractor also installed such veils along the access roads and other appropriate locations. This initiative of the EPC Contractor created a sense of norms protection in the community resulting in conducive relations.



Green Shade Net at Residential Colony Site

187. The EPC Contractor regularly held monthly HSE champion events whereby prizes are distributed among labors (skilled/unskilled) who demonstrated proven adherence to the worksite safety protocols. This initiative is indeed a commendable practice to promote a safe environment at the worksite. It recognizes and empowers individuals within the workforce who displayed exceptional commitment and dedication to HSE practices. By establishing HSE champions, the organization encourages a culture of safety, and empowers employees to take an active role in identifying and addressing potential hazards or risks. These champions serve as role models and ambassadors for safety, promoting best practices, conducting safety inspections, and fostering a collaborative approach to mitigate risks. The HSE Champion Program fosters increased awareness, engagement, and accountability among the workforce, leading to a safer work environment, reduced accidents, and improved overall well-being.

188. Although limited open spaces are available in the camps, the EPC Contractor arranged sports and other recreational activities. For example, at Adit-02 camp, the EPC Contractor provided A basketball facility where basketball matches were regularly held at evening time. Such an activity is beneficial for a healthy life, and utilizing spare time.

7.2 Opportunities for Improvement

189. Although the EPC Contractor created good working relations with the community through providing jobs and skilled development trainings, there is room for improvement in cementing such relations. This can be achieved through regular communication, addressing

community concerns, and implemening social responsibility initiatives. For example, at the dam site, the EPC Contractor's regular interaction has its own significance in subsidizing the social aggrieved sentiments, though intensity of such issues has largely been reduced during the last three months of the reporting period.

190. Although the PMC staff provided training to the EPC Contractor's HSE team, concentrated efforts are needed to improve the quality of periodic reports.

8 SUMMARY AND RECOMMENDATIONS

8.1 Summary

- 191. During the reporting period, construction activities at the residential colony, access roads, adit tunnels, batching plants and camps/workshops remained in progress. Dedicated staff from PMC and PIU regularly supervised and monitored the HSE aspects of these activities.
- 192. As evident from subhead 3.3, most of the non-compliances reported during the last SAEMR have largely been rectified during the current reporting period. Due to consistent efforts of the Project HSE team, regular capacity building/orientation trainings, incentives given under the HSE champion program, and fines imposed on HSE provisions violators, non-compliances have significantly been reduced during the current reporting period.
- 193. As expounded in the preceding paras, non-initiation of vocational training and hiring of full-time PMDC register doctor for the medical dispensary at the camp are the two major non-compliances which the EPC Contractor failed to rectify during the reporting period.
- 194. Owing to the complexity of the Basin-wide BAP initiative, consultations with key stakeholders and prospective financers continued with the aim to achieve a common ground, identify challenges, and pave the way forward to ensure smooth and early materialization of the Basin-wide BAP as envisioned in the EIA report.
- 195. The Project-specific BAP in the Area of Management is at the advance stage of finalization as focal persons, and field office for fisheries interventions have been identified. Contract signing with the departments (Fisheries and Wildlife departments of the government of KP) will be initiated upon ADB/AIIB's concurrence to the updated EIA report which is scheduled to be submitted on or before January 15, 2024.
- 196. Alongside other technical reports, the EPC Contractor submitted quarterly and monthly HSE progress reports, though such submission remained delayed due to reasons attributed to the EPC Contractor.
- 197. Instrumental environmental monitoring was held at Site in a timely manner, at the points pinned in the SSEMP. Except for a few exceedances in particulate matters and noise levels mainly associated with the earthwork activities, the results obtained were generally consistent with the baseline results.
- 198. **Table 8.1** exhibits the status of implementing the targets set in the previous SAEMR during the current reporting period.

Table 8.1: Implementation Status of Corrective Action(s) Proposed in the Previous SAEMR

		able 8.1: implemen	itation Status	of Corrective	Action(s) Propo	sed in the Previous SAEMR
S/No	Issue	Required Action	Responsibility	, ,	Description of Resolution and Timing (Actual)	Reason(s) of delay/non-achievement and further Action Required with Time frame
1	Pending signing of BAP contract with Fisheries and Wildlife departments	Finalize various modalities, e.g. offices, human resources, payment modalities, in consultation with the Fisheries and Wildlife Departments of the government of KP.	PIU- Balakot HPP (300 MW)	October 15, 2023		 i. Delay was primarily attributed to updating EIA, its review and concurrence by ADB. ii. During the ADB safeguard review mission on September 18, 2023, it was agreed that the updated EIA will be submitted upon ADB's concurrence to the Basin-wide BAP Second Consultation report to reflect agreed changes, if any.²¹ iii. EIA will be submitted on or before January 15, 2024, while Project-specific BAP contract will be signed within two months of the EIA's concurrence or till April 30, 2024, whichever comes first.
2	Missing record of springs identified in the headrace tunnel alignment which may potentially be affected by the underground excavation work.	Identify springs/underground water sources along the headrace tunnel/underground works.	EPC Contractor	August 15, 2023	In progress	 i. The EPC Contractor submitted a hydro-census Report in November 2023. ii. The PMC communicated comments, while updated submission is targeted on January 25, 2024.
3	Pending approval of muck disposal sites	Submit method statements for review and approval containing muck disposal sites' details	EPC Contractor	September 15, 2023	In progress	i. In response to the EPC Contractor's report containing sites identified for muck disposal, the PMC EE undertook due diligence of the identified sites in September 2023. Consequently, only 1 out of the 10 identified sites was found suitable subject to construction of protection and drainage works. The rest were either found unfeasible or required costly access and huge protection works. The EPC Contractor will submit the revised report, containing new sites and responses to the PMC for review on or before January 25, 2024.
4	Pending NOCs for solid waste disposal, including medical	Follow up applications submitted for NOCs.	EPC Contractor	July 20, 2023.	August 11, 2023	i. KDA issued NOC for solid waste disposal on August 11, 2023. ii. NOC for the medical waste disposal is still pending

²¹ For further details, refer to subhead 3.1.6

S/No	Issue	Required Action	Responsibility	Timing (Target Date)	Description of Resolution and Timing (Actual)	Reason(s) of delay/non-achievement and further Action Required with Time frame
	waste					with the relevant quarters at District Headquarter Hospital Mansehra. iii. With the assistance of PIU, the requisite NOC is expected to be obtained by January 30, 2024.
5	Pending Tree Plantation Plan	Submit Tree Plantation Plan with the consent of relevant quarters at the Forest Department	EPC Contractor	October 30, 2023.	December 11, 2023	i. Although the EPC Contractor submitted the Tree Plantation Plan within the target date, it was deficient in details. The revised plan was submitted on December 11, 2023, which remained under the PMC review during the reporting period. ii. Tree Plantation Plan will be submitted to PIU on or before January 14, 2024.
6	Non-availability of spill kits	Provide spill kits	EPC Contractor	July 31, 2023	December 15, 2023	Although the EPC Contractor supplied spill kits within the target date, the quality was not good and hence rejected. New spill kits were subsequently provided in December 2023.
7	Nonprovision of earplugs to the work force at machinery operation sites.	Provide earplugs and other essential equipment	EPC Contractor	July 28, 2023	July 25, 2023	Closed.
8	Non-availability of grease trap	Provide grease traps where needed as part of the washing yard.	EPC Contractor	August 30, 2023		 i. Grease trap is part of the EPC Contractor's washing yard. ii. As the EPC Contractor has not decided yet on whether to construct washing yard or not, the grease trap is pending.

199. The Corrective Action Plan in Table 8.2 shows pending issues from the previous monitoring period and those identified during the current monitoring period.

Table 8.2: Corrective Action Plan against issues identified during the Previous and **Current Monitoring Periods**

S/ No	Issue	Required Action	Responsibility	Timing (Target Dates)
	Pendi	ng Issues from the Previous Rep	oort(s)	,
		 i. Submit the updated EIA report to ADB/AIIB reflecting changes in the Project-specific BAP and design (Dam site). ii. Finalize various modalities, e.g. offices, human resources, and payment modalities, in consultation with the Fisheries and Wildlife Departments of the government of KP. 		April 30, 2024
		tified during the Current Monito		
1	Pending establishment of fully equipped dispensary under the full-time charge of the PMDC registered medical doctor	Hire full-time PMDC-registered medical doctor	EPC Contractor	January 30, 2024
2	Pending vocational training for community	 i. Finalize list containing eligible candidates from the affected community. ii. Secure admission to the identified governmentapproved institute. 	EPC Contractor	January 30, 2024
3	Pending NOCs for medical waste	Follow up the applications submitted for NOC.	EPC Contractor with the assistance of PIU	January 30, 2024
4	Depending disposal of A- 02 camp kitchen effluent	Construct filter/treatment facility	EPC Contractor	February 15, 2024
5	Pending submission of i. Updated EIA report ii. Tree Plantation Plan iii. Blasting Management Plan	Submit plans to ADB for review and concurrence	PIU)	January 15, 2024.
6	Pending second Basin- wide BAP Consultation Report	Prepare the 2 nd Basin-wide BAP Consultation Report containing details of the consultation(s) carried out with the stakeholders, and recommended course of action(s).	PIU and PMC	January 30, 2024

8.2 Recommendations

- As recommended in the virtual consultation meeting with the prospective financiers of the Basin-wide BAP on November 14 & 17, 2023, the proposed larger joint consultation meeting with the stakeholders should be held at the earliest to finalize future course of action.
- Subsequent to ADB and AIIB's concurrence to the updated EIA report, concentrated efforts will be needed on the part of stakeholders to enable PEDO to sign contract(s) with the Fisheries and Wildlife departments of the government of K P as field activities cannot be initiated unless the contracts are signed.

ANNEXURES

Annexure-01: Minutes of HSE Weekly Progress Review Meeting (December 29, 2023)

S.Ru.	Adams No.	Dated December 29, 2023 Action	Sesponsit	Tiesa France
1.	Agenda Nee i. Discussed major non conformances and Ever effective introlation. ii. Rather waste water directly dump in to the Nation. And Patistion mean waste efficient was not connected with the main sewer line. iii. GINC and Bus Cartractor recovers its maliture PPEs.	Contractor PMC and PEDID decided to nectly the non- conformation right on time and in the weakly progress meeting all electrosists will review the MSE progress of the contractor. A Number scheeps shake be non-scool with the risks sewer the and construct the state sewer the and construct the filter before dumping whether offsoors.	Sity EPC Cambridge	E Reger date 12 Jen., 2024. 8. Nathern sowing disposed 10° August 23° Reger 2024. New Date: 31° Jen., 2024. 8. PPEs 10° Jen., 2024.
2	Size wandplace order transferor or strou and English	PMC individual to the Contractor to increase the Video in English and Unit, language EPC contractor agreed to translate the video of both languages.	SAC Contractor	Target date will be November, 2023 [Inc. or Frenting]
1	Curron status of vocational, and HINL telengo.	i PMC acrossor the constactor to cobrect the acrossole of HSE tremengs or training matrix. If PRJ forcer team have been the approved fel of the perforpants to the EPIC contractor, detain the EPIC contractor, detain the contractor to make observation time of the institute. IV DID, PEIDO have instructed to the contractor to over the next coming activisation done and update the PMC and PEIDO. V. PMC will write a tetter on delay in administration process. for viccellocal training.	WITH THE REPORTURE OF FILLIPPIAC TOCKET HEATT	Vocational froming Wocational froming will be in the most of November as p Institute's schedul toke incomp. Letter 1", Jun. 2004.
	Nucking operation Clearly meeting the disposal site for most ritigional	CPC contractor favor substitled their programs for result dispessal area to other contractors dispessal area to other contractors dispessal area to their contractors will be supported to conduct one to the proposed much dispessal areas with PEDIO and EPC Contractors.	DPG	Doober, 10" 2023 (ISSE Person) Heart vist with GPC, PMC, PCOS. December, 28", 20 New Hote: 2" set, 2014.
	existing the extends	Emergence exposition cell should be concluded. Contractor will invite the PMC exec PECKI to mention the performance of the execution data. PMC enthrotted to the contractor to conclude execution drift between of Dec. Contractor has requested to PMC for going them may lieve to achealing the evacuation drift more testion.	SPC Contractor	Wind sock. Ontober, 2023 Useue Frending Execution Diti: 67, Jan. 24

Annexure-02 103

S.No.	Agende flore Decision final incident investigation squart subsession Waschman modern inflat report.	Action EPC contractor requested for more time to investigate the accident PMC argo on timely reporting of the incident PMC school to the contractor about the chiley in automation of the initial investigation report of the	thry thry through the Contractor	Final Incident Report Execution, 20°, 23 distoir Pondings Final and Initial reports of both incidents
		wetchman. EPC commactor informed that the incident was occurred outside the site. PMC urge to extent the initial report then PMC will investigate it.		respectively. New Date: December: 30*, 23
ř.	SE coverage or	PMC urged the DPM for increasing the HSF manpower on the for purit, rectfloation of HSE issues. GSGC hand new HSE afficient test. Chinese and two Pakisteri. PAC assect to him two more HSE officers for the right shift.	Contactor	20°, October, 2023
	OnC mostly about in the HSE propers rovine mostings.	PMC take the action against the CRC cascal attlade trever HSE interlige and its procedural single-needation. PMC decided to write a letter on GRC sinkenous attlacts toward HSE.	PERC	Letter: 1*, Jan. 24
	CV of the Disclor has sub-extent to the PMC text not proceed further for hidesy process.	Permanently angage PMDC certified Occion and fully incopped the Clinic Contractor now searching for the soctor again offer the change management. Contractor sifterned that they perstake all the requires equipment and bests for the URIC. PMC will valid the clinic to verify its particular influences.	EPC Curtiscus	Equipment 18" November, 23 Inner Count Letter for the Dector: 1" Jan 24
10.	GPC workers were found incroper PPTs and loss dofting	Instructed to the concerned for effective implementation of the PPTs on etc. PMC will write the sotic on the volution of PPTs non-compliance. PMC esked to the CGGIC for taking action against GRC.	EPC Contactor	10" November 25 Heast Parizing) Take action against ISRC, 1" Jan. 24
11.	Empty First and larkers on the site:	Hill team will check at the tricial boxes and refling the virgures fema. COSC comprise but SPC not book any action.	Controlle	15" Jan 23
12.	Private to work procedure is not procedure is not proprietated on the site.	Apply the PTW possedure as the sim- eric at Tagh-tex, jobs should perform under the permit to wars procedure. EPG connector said that the PTW procedure implementation will be difficult. PMC and PEDO emphasion to apply PTW procedure. Contractor has agreed to implement the PTW procedure.	EPG Contractor	15° Jan. 24
11.	Condeon of the workers camp in rick up to the standard.	DU, PEDD informed the EPC contractor that the PMC and PFDQ will conduct the visit of the workers camp in the report of fearencer. EPC contractor respect than the Camp under construction when I will compete the base will be rectified.	EPC Contactor	28°; Feb. 24

5.No	Agenda How	Action	(kity	Time Frame
14.	Rod light in the right time on all Adits.	PMC instructor to the EPC contractor to arrange the proper light pushers on the excess reades and in the fundate for executing sale work. PMC showed the pictures of regre shift, accordantly the his solvey of the size conducting the his solvey of the size. Conductor responds that they already recities the sales, that they already recities the sales, that he will have all vertical the sprain that he will have all vertical the sprain that he will have fore recovering the trace fore recovering the trace fore recovering the trace fore	EPG Contractor	267, December,
12.	Access road of the Acte F & 2 yes mustry and slippery due to the under	PNC instructed to the contractor for the rectification of the leader without any delay. ETC contractor respond that the leave	Contractor	Car washing are 15": Jan. 2024 floor Cloud
	accomulation.	has been resolved right after the company raised by PMC HBS expect. PMC HBS expect. If the conductor to escapios the car washing area as:		Drain System 187 Jan. 2024
		memors in the SSFMP, to anop the car- weating on the road. Continued and manage the draw system in the turnels. EPC continues informed the PMC that car wash is constructed and the draw		erstallation of greaters of trep. 28", Feb.2024.
16.	Availability of Lac Motor, Gos last males (MI(A) Meter	against to in sensing. PMC and PDDO traineded to conduct gas list, far survey, sound intensity measurement.	DFC Curksdur	31°, Jan. 2024.
17.	Segregation of the PINE and Non-PINE Area	PMC instructed to the EPC contractor to conduct risk assessment and establish the non-PPE area and model the	EPC Curtactur	31%, Jun. 2024.
18.	HISC Inhouse training persons.	Rightage on the 68e. PVC Instructed to NV. Datter and 69. Instead for construction HSE in double fluiding seesan.	EPC Contractor	31st Jan. 2024
19.	Patistari Werkers Meer condition and prioritage of facilities	PVC and PEGO urgs to the consuctor to dop the documentors between the Patrickers and Chinese workers' mens. Provide proper temperature receives only property crisis and takes sit; in the Patricker mass.	EPC Contactor	31st. Jan. 2024
76.	Writer contingency plan requirement	PEDO instructed Contractor for the properation and submission of the winder consequency plans without any delay. PEDO saled PWG for writing a letter to the contractor on the winder consingency other submission.	Contactor & PMC	Letter 28° Dec. 23 (860e Oktoor) Confegency Plan, 15° Jan, 24
H.	History of HSE profesionars. Depute hosseweping staff on each ASI.	On allo alread feet in the day time and one of the agint for each Ads. Copute test housekeeping staff on each Ads.	Gortractor	31°, Jan, 2024

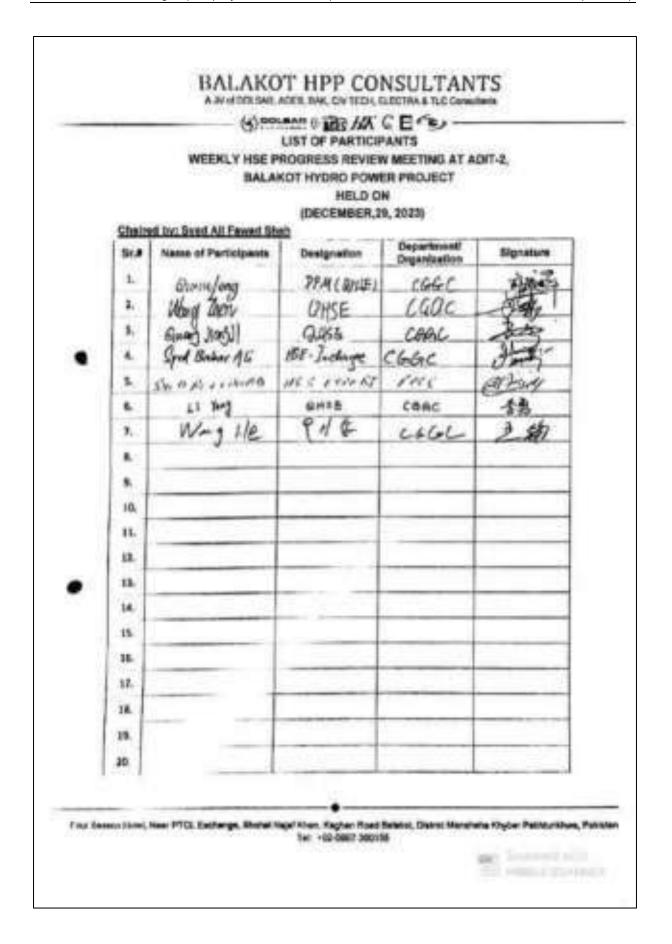
S.No	Agency How	Action	(ATy	Times Frame
25.	invaliation of fash light and reverse alters on all housy serscles;	PVC instructor to the contractor had conducting older preventive resentationaries of all valuable and roothy the all-assess intention in the verside checkflet. Urgority senancy the fluor light und inverse olders for all treasy vehicles. EVC contractor between that the issue has been resoived.	Gortaems	31", Jan. 203
11.	Placeton condition n. Adh3	PVC maturate to the Connector for the maintenance of wavenesses in the Adh-3 and provide more Gease.	Contacto	314, Jan. 202
34.	Durture and eighage on all the high risk pole.	PMC instruct the comments for the performing all high-risk jobs under twents and install alignings for the awareness of the other worker. Housekeeping workers should utilize for the sent activity.	DPG Cambridge	167, Jen. 202
29.	Carthest Space format need to option	PVC agreeable the offers of M. Agree for effective implementation of the confirmal entry log sheet in AdV-2. PVC implication to Mr. Datase for appearing the confined above entry log sheet. A: the large of every dod axis entrain need to sign the log sheet vetre.	Contractor	15°, Jan. 202
34.	Lack of I till coverage by SRC.	GRC do not have ITSE manager and officers in their department as meritian in the Method statement. INC constructly instructed to the construction has all the property on the liana and side according to the extinct of the construction for the activities of the ITC Contractor for the safety of the workers.	IPC Curbectur	5", Jan. 2004

Pictures of HSE Weekly Progress Review Meeting









Annexure-02: Due Diligence of Muck Disposal Sites

Balakot HPP (300 MW) Due-Diligence of the Identified Muck Disposal Sites September 25-26, 2023

	Balakot HPP (300 MW) Due-Diligence of the Identified Muck Disposal Sites September 25-26, 2023						
S/ No	Muck Disposal Site	Muck Capacity (m³) (Estimated by the EPC Contractor		Feasible/Not Feasible	EPC Contractor's Required Action	EPC Contractor's Submissions for Final Approval	
1.	Powerhouse -2	100,000	Protection and drainage works required. Area falls under permanent land acquired for R-3	Feasible subject to provision of protection and drainage works	Design of protection and drainage Works	Submission of protection works and drainage drawings for the PMC review and approval	
2.	Powerhouse -3		 I. Area at upper elevation with no access II. Valley has steep slopes III. Impact on trees. V. Muck compaction and stability will be an issue V. No sufficient space available for mucking 	Not feasible	Identify alternate site	Nil	
3.	Powerhouse -4	30,000	II. Impact on few trees III. Insufficient space for mucking III. Huge protection works along the Kunhar River will be required V. Access to the area will be needed V. Apparently, not cost effective identification	Apparently not feasible however, if the EPC Contractor is agreed to provide huge protection works along the Kunhar River, the area may be acceptable for mucking.	Either: I. identify alternate site; or II. design protection works along the Kunhar River and provide access to the site.	No submission required if site is discarded by the EPC Contractor as recommended by the PMC II. If the EPC Contractor agreed to provide access to the site; protection works along the Kunhar River, and trees then submission of design and drawings of the above will be required for the PMC review and approval.	
4.	Powerhouse -5		Protection along the Kunhar River needed Cutting of trees involved Access across the nullah will be needed Construction of box culvert or bridge.	Feasible subject to: I. provision of protection along the Kunhar River; II. compensatory tree plantation; and III. construction of access road across the nullah IV.	Design, protection work all along the Kunhar River and access to the identified site Tree compensation and plantation Temporary land acquisition	Submission of the following for the PMC review and approval: I. protection work, access road and bridge/box across the nullah; and II. Compensatory tree plantation plan as part of the overall Tree Plantation Plan	
5.	Powerhouse -1		Huge protection work will be required along the Kunhar River Capacity will be reduced due to protection works construction Mostly lying in the River bed	Not feasible	Identify alternate site	Nil	
6.	A3 Spoil Deposit	400,000	PMC Comments already traded with the EPC Contractor The EPC Contractor response is awaited.	Feasible subject to: I. incorporation of the PMC comments. II. Provision of protection works	Response to the PMC comments	Submission of the following for the PMC review: I. protection works design; II. channelization of stream; II. tree compensation plan	

S/ No	Muck Disposal Site	Muck Capacity (m³) (Estimated by the EPC Contractor	Preliminary Assessment	Feasible/Not Feasible	EPC Contractor's Required Action	EPC Contractor's Submissions for Final Approval
7.	A3 used	Not given	Muck leveled for construction and	III. Channelization of stream water The area identified in front of	Channelization of stream	Submission of design of the
7.	spoil deposit		installation of temporary facilities II. The area in front of the demolished workshop has no vivid capacity and requires huge protection works	the demolished workshop is not feasible for mucking due to huge protection works	under passing through temporary facilities.	protection works for the part of identified area used for temporary facilities for the PMC review and approval. II. No submission for area in front of demolished area as the area is not feasible.
8.	A2		Dense trees on the upper part of the identified area Capacity appears less Site is identified at the nullah bed level All weather protection works will be needed	Not feasible being identified on the same level of the Ganhool Nullah. Nevertheless, if EPC Contractor provide all weather protection works, then a small part of the identified area may be used for muck disposal RoW of the perennial Ganhool Nullah and upper parts are not permitted to be used for muck disposal.	use some parts of the identified area.	If the EPC Contractor intend to opt for some parts of the identified area, then shall submit protection works and levels showing the elevation of muck disposal areas.
9.	A1	510,000	No access road to the identified disposal area Cutting of trees along the slope Protection works along the perennial Kawai Nullah.	Feasible subject to: I. provision of protection works along the Kawai Nullah; II. construction of access road; and compensatory tree plantation.	Design of protection works and access road Compensatory tree plantation	Submission of the following for the PMC review and approval. I. Design of protection works and access road II. Compensatory tree plantation plan as part of the overall Tree Plantation Plan.
10	Dam site deposit	550,000	 I. No space available in the narrow Sacha valley II. Identified area falls in the Sacha perennial stream III. There are houses/built-up property in valley which will be affected by the mucking operation V. Cascade protection works will be needed 	Not feasible. Muck disposal in the perennial stream or any other water body is not permitted.	Identify alternate site	Nil

S	/ o	Muck Disposal Site	Muck Capacity (m³) (Estimated by the EPC Contractor		Feasible/Not Feasible	EPC Contractor's Required Action	EPC Contractor's Submissions for Final Approval
				V.For mucking operation, apparently,			
				vehicles will travel to the elevated parts of			
				the existing access road to off load muck			

Annexure-03: Minutes of Basin-wide BAP Consultation Meetings

Annexure-03

Minutes of Basin-wide BAP Virtual Consultation Meeting Held on 14th November, 2023 Balakot Hydropower Project (300 MW) District Mansehra

Minutes of Virtual (Zoom) Meeting with the Prospective Financiers of Basin-wide BAP

Agenda: Biodiversity Action Plan (BAP) financing provisions in

the EIA reports/tariff of hydropower projects in the Jhelum Basin and assessment of challenges in its

materialization.

Meeting held on: 14th November, 2023

List of Participants:

Mr. Aziz Raza: Project Director Balakot HPP (300 MW)

Miss Ibtesam Zaima Khan: Deputy Director (E&HS and Gender) Balakot HPP(300

MW)

Mr. Assad Ali Khan : Environmental Expert of PMC-Balakot HPP (300MW)
 Mr. N A Zuberi: Senior Advisor CSAIL, Karot, Mahl, and Kohala HPPs
 Mr. Naeem Akhtar: Senior Manager Environment Karot, Mahl and Kohala HPPs

Mr. Shah Abd Ullah: Assistant Manager PD, 700.7MW Azad Pattan HPP

Background

In continuation of consultation meetings, held with the stakeholders in August and September 2022, and thereafter, as agreed with the Asian Development Bank (ADB) Safeguard team, the Project Implementation Unit (PIU) of BTHPP (300 MW) arranged a virtual meeting on the agenda item cited above. The meeting was participated by the representatives of the Basin-wide BAP prospective financiers (as identified in the EIA report of Balakot HPP) and Environmental Expert of PMC.²²

Meeting Objectives

- (i) Familiarization of the prospective financiers with the Basin-wide BAP contained in the Environmental Impact Assessment (EIA) report of the Balakot HPP (300 MW).
- (ii) Assessment of the Jhelum Basin hydropower projects commitment towards BAP funding.
- (iii) Know-how attainment of the BAP budgetary provisions contained in the EIA report/tariff of prospective financiers.
- (iv) Identification of challenges in funding/materialization of Basin-wide BAP.

Meeting Proceedings

Subsequent to the participants brief introduction, the Project Director of Balakot HPP (300 MW) initiated the meeting proceedings by highlighting the meeting objectives and shedding light on various activities undertaken by the PIU in the Basin-wide BAP context. He also shared the PIU assessment of the consultation meetings carried out in the year 2022.

Before opening the floor for open discussion on the Basin-wide BAP, the Project Director invited Environmental Expert of the PMC to present BAP provisions contained in the Balakot HPP (300 MW) EIA report with particular emphasis on institutional and budgetary arrangements therein.

The presentation, jointly delivered by the PIU and PMC representatives, was mainly focused on:

(i) Balakot Hydropower Project introduction and Contract Management.

Annexure-03

²² Representatives of the prospective financiers (Patrind and Sukki Kinari HPPs) of Watershed Management Organization (WMO), envisioned for the Kunhar Basin however, could not attend the meeting due to their engagements. Consequently, a separate virtual meeting was held with them on November 17, 2023.

- (ii) Basin-wide BAP objectives; institutional arrangement; and PEDO's financial contributions in establishment of the Institute for Research on River Ecology (IRRE) and Watershed Management Organization (WMO).
- (iii) Details of various activities undertaken by PIU towards Basin-wide BAP materialization.
- (iv) A brief overview of BAP in the Area of Management under Balakot HPP (300 MW). During the course of presentation, participants were apprised that a detailed report i.e. Basinwide BAP Consultation Report, containing details of the consultation meetings held with the stakeholders, was furnished and shared with the Asian Development Bank for their consent on the PIU recommendations framed in light of the consultation findings.

Subsequent to the detailed presentation, the Project Director asked participants to present their view points on the agenda items.

The representatives of Karot, Kohala, Mahal and Azad Pattan HPPs openly expressed their view points and shed light on array of challenges in funding IRRE and WMO. They also discussed foreseeable delay in the development of hydropower projects identified in the Jhelum Basin.

The discussion held and view-points presented in the virtual meeting are synopsized as hereunder.

- (i) There exist provision of the Basin-wide BAP in some of the projects like Kohala, Azad Pattan, Karot HPPs etc. however, so far, no step has been taken by any of the project developer towards process initiation, mainly due to uncertainty of cost compensation and delay in the project execution.
- (ii) Although, PEDO share has been mentioned however, it is not clear what the overall budget is for IRRE and WMO establishment. Also, there are a number of other hydropower projects in the Jhelum Basin however, their financial contributions are not clear. Without knowing the IREE and WMO estimated budget, it may not be possible for the hydropower developers to make commitment of their contributions.
- (iii) Similarly, it is not clear how shares of various projects contributions have been fixed or would be fixed in future? Apparently, there is no sound mechanism for allocating such shares.
- (iv) There are operational projects in the Jhelum Basin where no BAP obligations exist. Neelum Jhelum and Patrind HPPs are the two projects in the instant case. It is not clear how such projects would contribute in Basin-wide BAP without making necessary adjustments in their Commercial Operation Date (COD) tariff.
- (v) Apparently, unless IRRE and WMO establishment and associated recurring costs compensation are not guaranteed in the individual project tariff, monetary contributions by the Jhelum Basin hydropower developers appear obscure.
- (vi) In spite of the fact that other obligations are fulfilled, the development of hydropower projects are facing persistent delays which will have direct bearing on the BAP materialization.
- (vii) The provincial and AJK environmental regulatory agencies should be given a leading role in the planning and implementation of Basin-wide BAP as they are custodian of the environmental portfolio while their instructions are legally binding enabling projects to claim the related costs in their tariff.
- (viii) In the absence of policy guidelines, collective efforts, and the leading role of federal or the provincial government relevant ministry, materialization of the Basin-wide BAP appears an uphill task for an individual project/developer.

Recommendations

Most of the participants recommended that:

(i) Collective Response

As Basin-wide BAP is an initiative aimed with collective response towards the environmental impacts caused by the hydropower project development so as to ensure sustainable development in environment friendly way hence, it would not be possible for an individual project to undertake such an initiative rather an Institution such as Private Power and Infrastructure Board (PPIB) which is attuned to safeguarding the environment should take a lead role in this regard.

As establishment and operation of IRRE and WMO is a complex matter hence, for Balakot or any other hydropower project, it would not be possible to convince the Jhelum Basin projects on BAP financing.

(ii) Consultation with all Projects

Other hydropower projects, whether mentioned in the Balakot HPP (300 MW) EIA report or not, should also be consulted to devise a collective approach in the matter.

(iii) Joint Meeting

Keeping in view the challenges at fore, it was agreed that a joint meeting of the Basin-wide BAP stakeholders, including PPIB, relevant entities in provinces and AJK and lenders including the Balakot HPP (300 MW) financiers will be convened to set an appropriate course of action.

Conclusion

The Project Director Balakot HPP (300 MW) concluded the meeting with gratitude to the participants and encouraged them to share their written recommendations. These will be discussed with the Safeguard team of the ADB and Asian Infrastructure Investment Bank (AIIB).

MINUTES OF BASIN-WIDE BAP VIRTUAL CONSULTATION MEETING HELD ON 17TH NOVEMBER, 2023

Balakot Hydropower Project (300 MW) District Mansehra

Minutes of Virtual (Zoom) Meeting with the Prospective Financiers of Basin- wide BAP

Agenda: BAP financing provisions in the EIA reports/tariff of

hydropower projects in the Jhelum Basin and

assessment of challenges in its materialization.

Meeting held on: 17th November, 2023

List of Participants:

• Mr. Aziz Raza: Project Director Balakot HPP (300 MW)

• Miss Ibtesam Zaima Khan: Deputy Director (E&HS and Gender) Balakot HPP(300

MW)

Mr. Assad Ali Khan : Environmental Expert of PMC-Balakot HPP (300 MW)
 Mr. Hasnain Ashfaq Hashmi: Environmental Manager(QHSE) Suki Kinari HPP (884

MW)

Mr. Sayyed Atif Ali Shah
 Senior Manager ENS Patrind HPP (150 MW)

Background

In continuation of consultation meetings, held with the stakeholders in August and September 2022, and thereafter, as agreed with the Asian Development Bank (ADB) Safeguard team, the Project Implementation Unit (PIU) of BTHPP (300 MW) arranged a virtual meeting on November 14, 2023, on the agenda item cited above. However, as representatives of the prospective financiers (Patrind and Sukki Kinari HPPs) of Watershed Management Organization (WMO), envisioned for the Kunhar Basin, could not attend the meeting due to their engagements, thus a separate meeting (this meeting) was arranged for them on the same agenda item.

Meeting Objectives

- (v) Familiarization of the prospective financiers with the Basin-wide BAP contained in the EIA report of the Balakot HPP (300 MW).
- (vi) Assessment of the Jhelum Basin hydropower projects commitment towards BAP funding.
- (vii) Know-how attainment of the BAP budgetary provisions contained in the EIA report/tariff of prospective financiers.
- (viii) Identification of challenges in funding/materialization of Basin-wide BAP.

Meeting Proceedings

Subsequent to the participants brief introduction, the Project Director of Balakot HPP (300 MW) initiated the meeting proceedings by highlighting the meeting objectives and shedding light on various activities undertaken by the PIU in the Basin-wide BAP context. He also shared the PIU assessment of the consultation meetings carried out in the year 2022.

Before opening the floor for open discussion on the Basin-wide BAP, the Project Director invited Environmental Expert of the PMC to present BAP provisions contained in the Balakot HPP (300 MW) EIA report with particular emphasis on institutional and budgetary arrangements therein.

The presentation delivered by Environmental Expert was mainly focused on:

- (v) Balakot Hydropower Project introduction and Contract Management.
- (vi) Basin-wide BAP objectives; institutional arrangement; and PEDO's financial contributions in establishment of the Institute for Research on River Ecology (IRRE) and Watershed Management Organization (WMO).
- (vii) Details of various activities undertaken by PIU towards Basin-wide BAP materialization.
- (viii) A brief overview of BAP in the Area of Management under Balakot HPP (300 MW).

Annexure-03

During the course of presentation, participants were apprised that a detailed report i.e. Basin-wide BAP Consultation Report, containing details of the consultation meetings held with the stakeholders, was furnished and shared with the Asian Development Bank for their consent on the PIU recommendations framed in light of the consultation findings.

Subsequent to the detailed presentation, the Project Director asked participants to present their view points on the agenda items.

The discussion held and view-points presented in the virtual meeting are synopsized as hereunder.

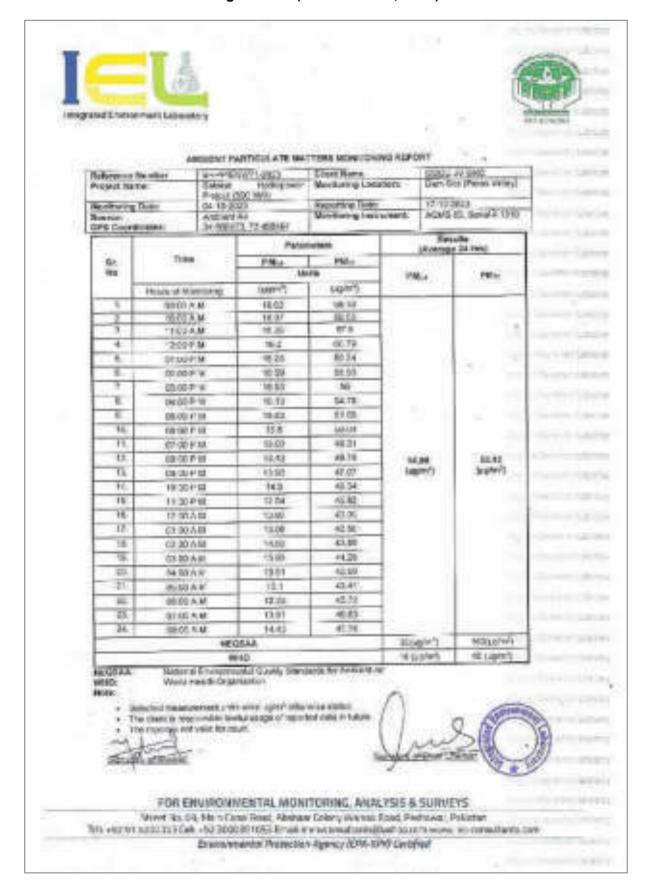
- (ix) The representatives of Patrind and Sukki Kinari HPPs openly expressed their view points and shed light on earlier efforts made in this regard. The Patrind HPP (150 MW) representative recalled that ADB and IFC had previously made efforts to bring proponents of the hydropower projects on one platform thereby forming Hydropower Development Group however, after a period of around 3 years, the efforts couldn't get any momentum.
- (x) As Basin-wide BAP provisions were not made part of the EIA reports of both the projects hence, no budget allocations were made in the project development.
- (xi) There are operational projects in the Jhelum Basin where no BAP obligations exist. Neelum Jhelum and Patrind HPPs are the two projects in the instant case. It is not clear how such projects would contribute in Basin-wide BAP without making necessary adjustments in their Commercial Operation Date (COD) tariff.
- (xii) Apparently, unless IRRE and WMO establishment and associated recurring costs compensation are not guaranteed in the individual project tariff, monetary contributions by the Jhelum Basin hydropower developers appear obscure.
- (xiii) The Patrind HPP (150 MW) is operational since years, without having any BAP budgetary provisions in its COD tariff hence, the Project would not be able to monetarily contribute in Basin-wide BAP initiatives although, the management is in full agreement with the initiative.
- (xiv) As the Sukki Kinari HPP (884 MW) COD level tariff is yet to be approved by NEPRA, hence, monetary contribution in BAP will then be decided by the management of the Project.
- (xv) In the absence of policy guidelines, collective efforts, and the leading role of federal or the provincial government relevant ministry, materialization of the Basin-wide BAP appears quite challenging under the circumstances.

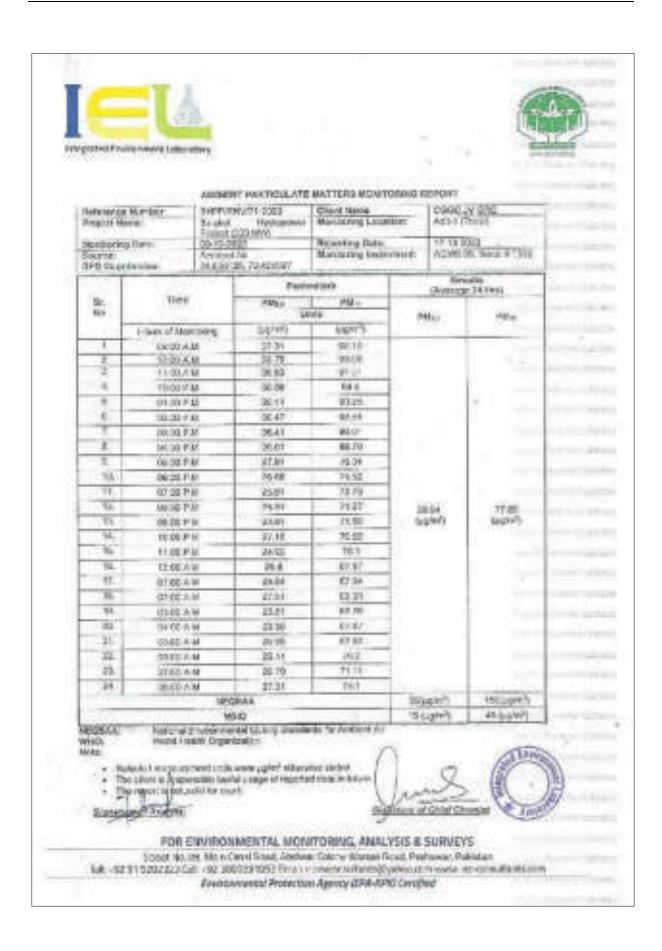
Conclusion

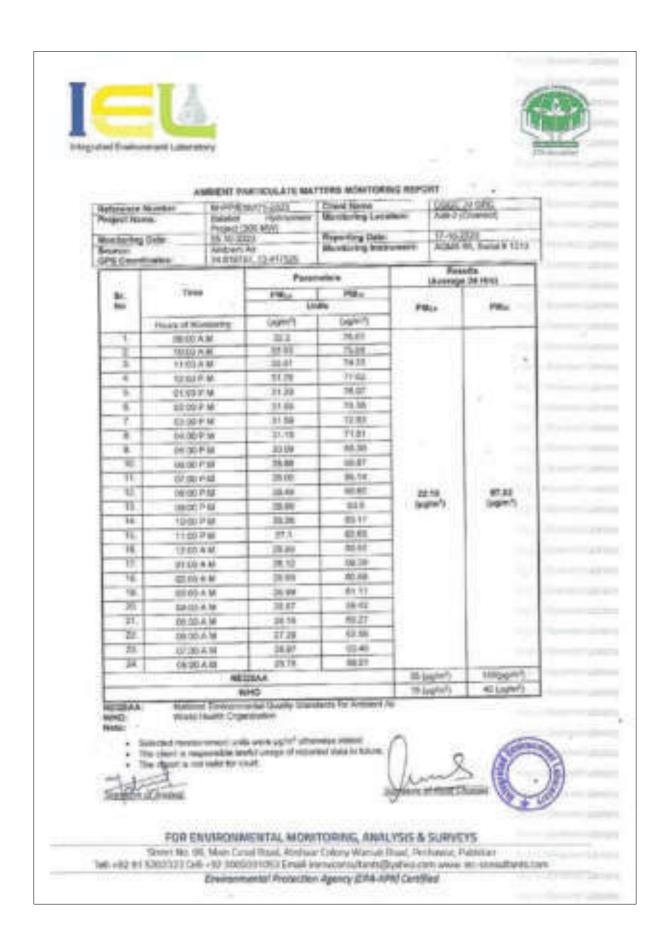
The Project Director Balakot HPP (300 MW) concluded the meeting with gratitude to the participants and encouraged them to share their written recommendations. These will be discussed with the Safeguard team of the ADB and Asian Infrastructure Investment Bank (AIIB).

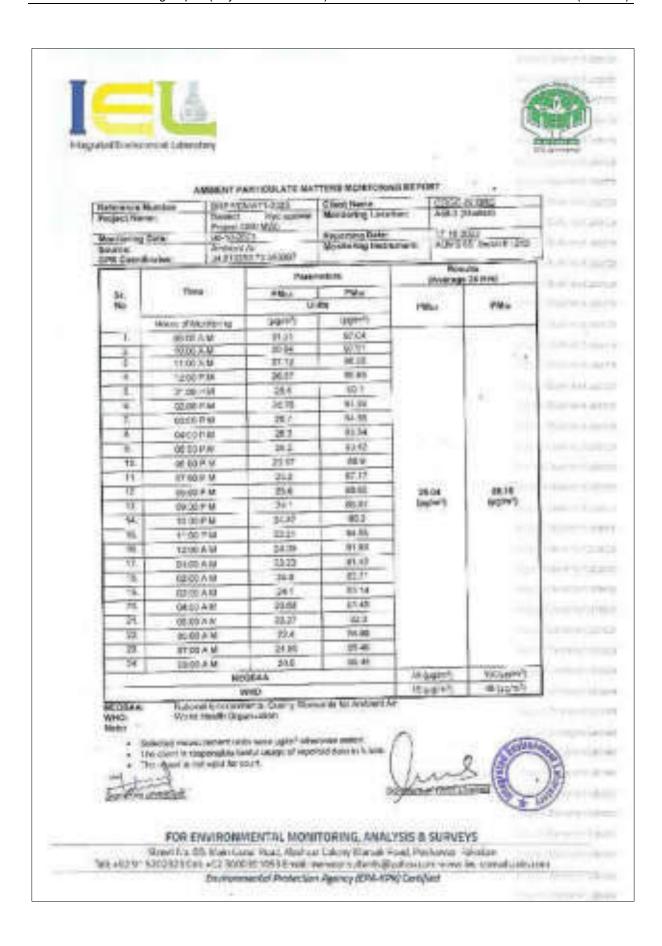


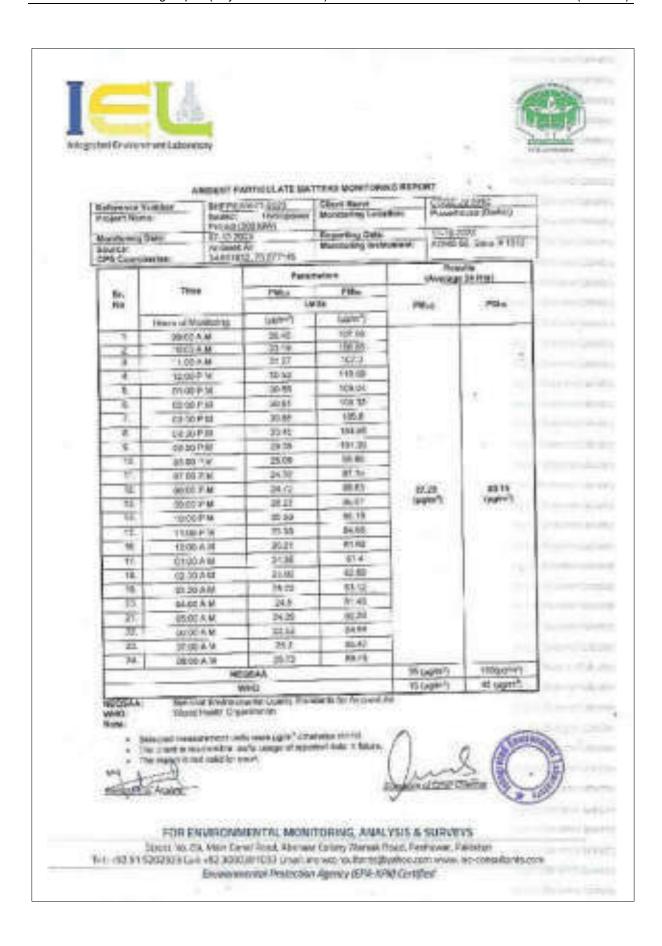
Ambient Air Monitoring Results (Third Quarter, 2023)-Particulate Matters

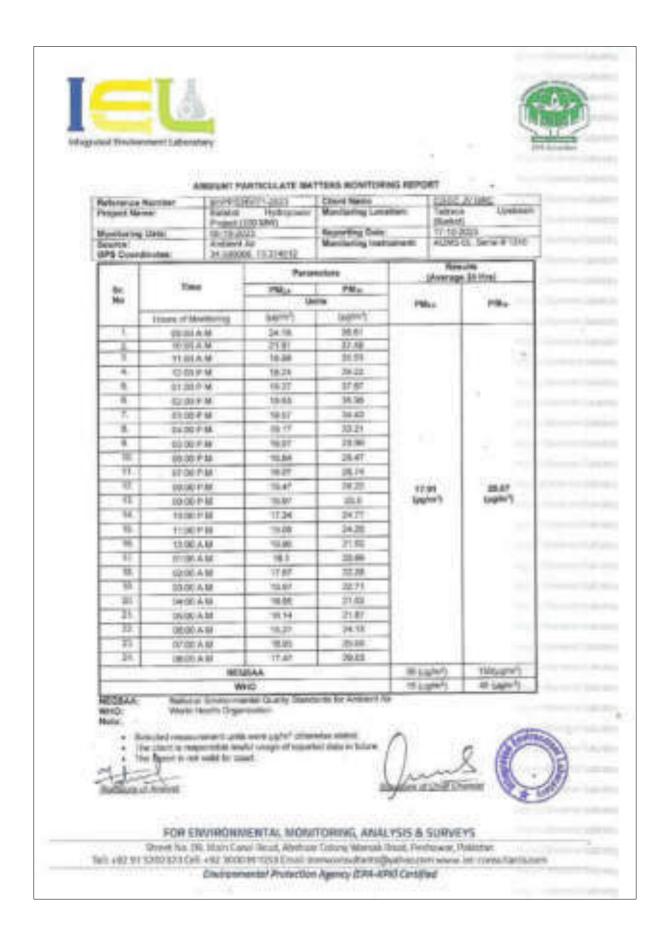




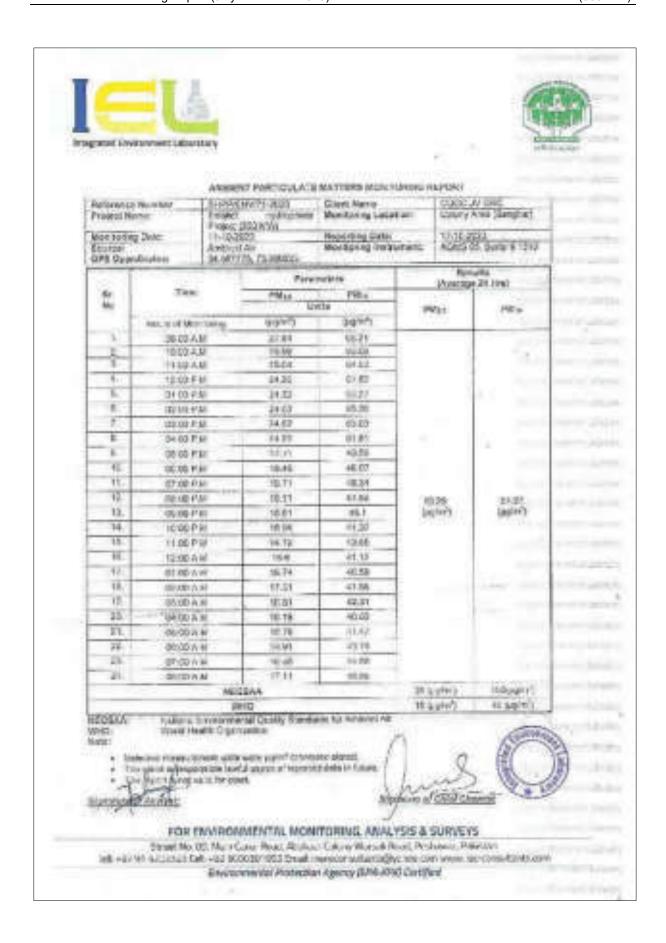


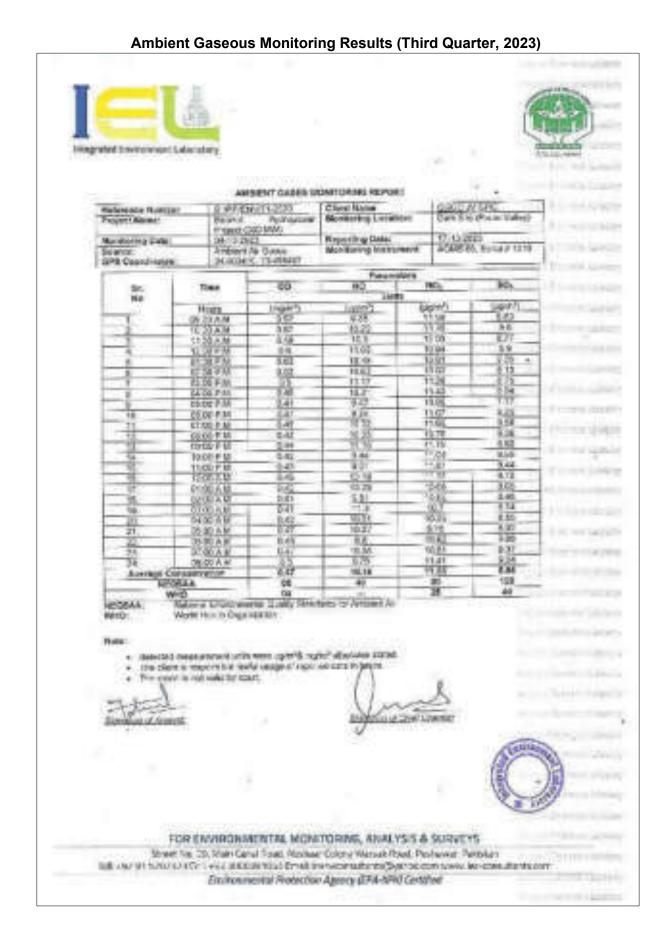


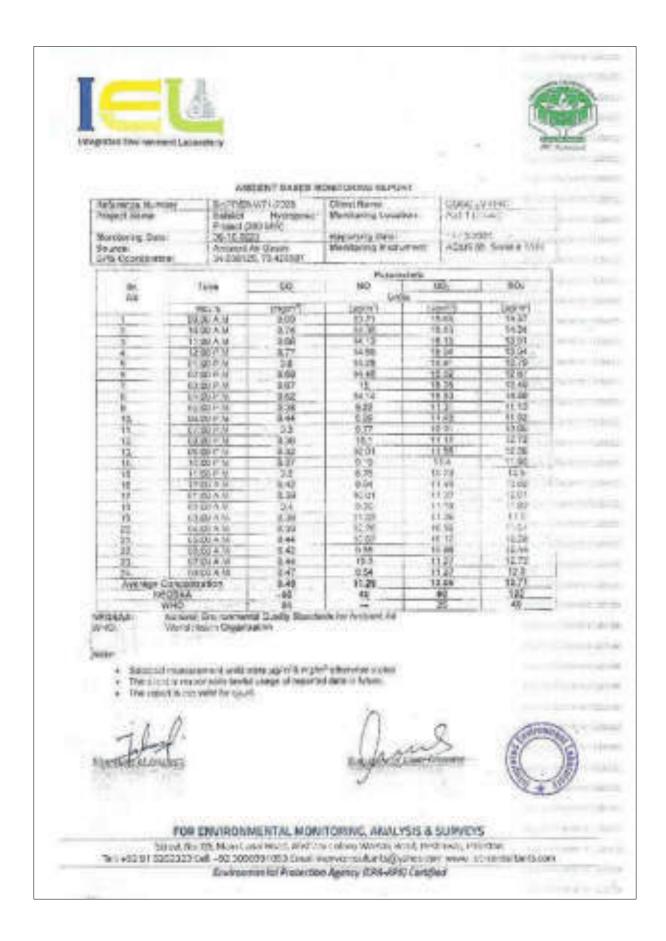


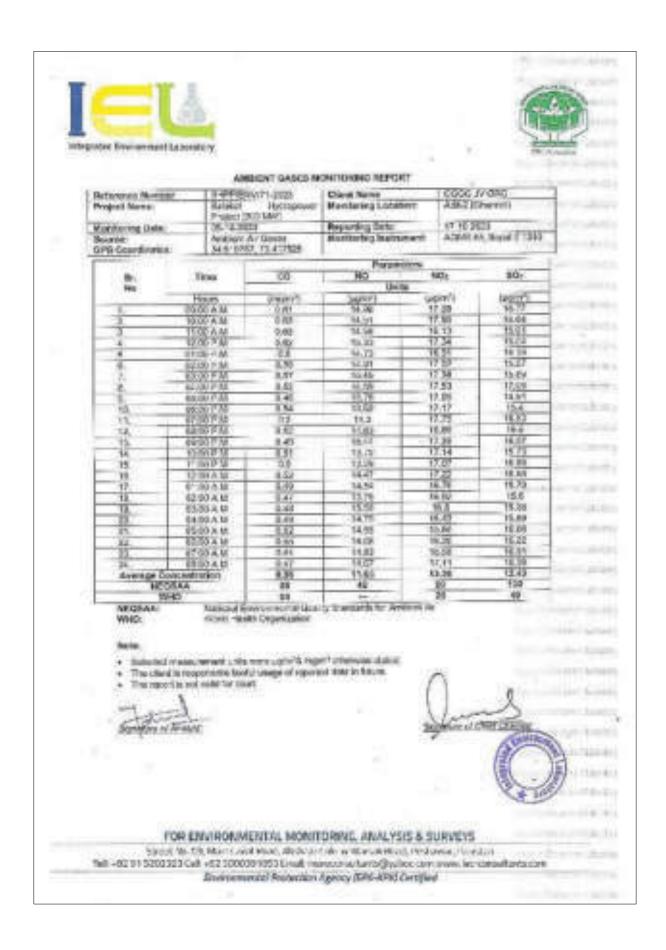


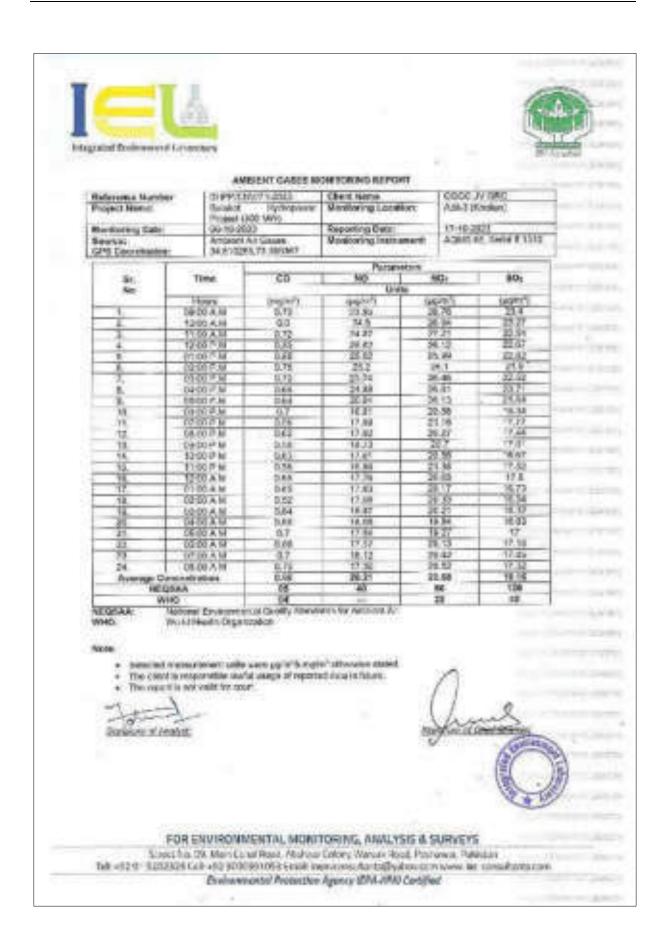


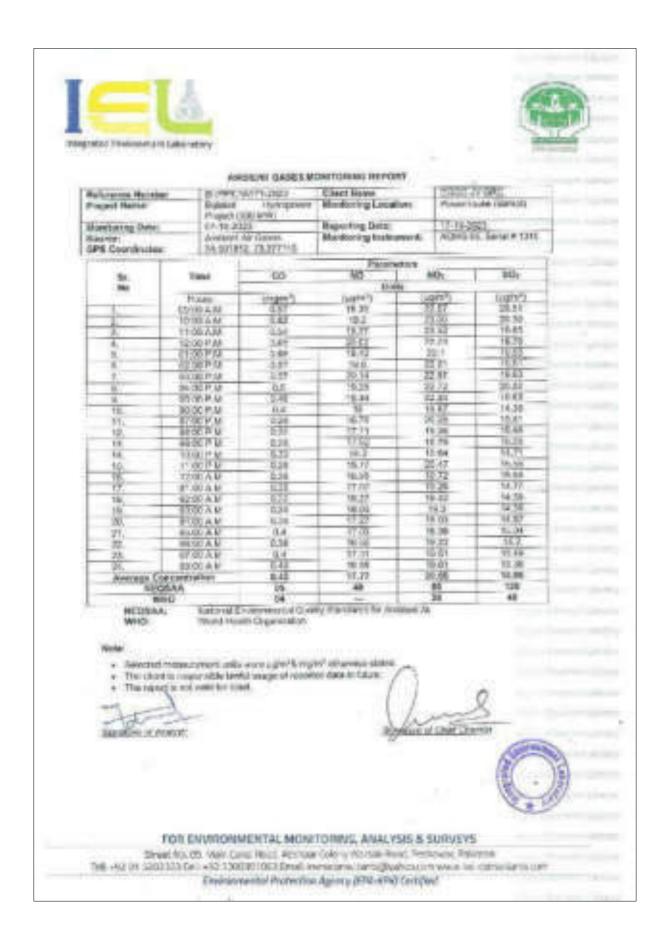


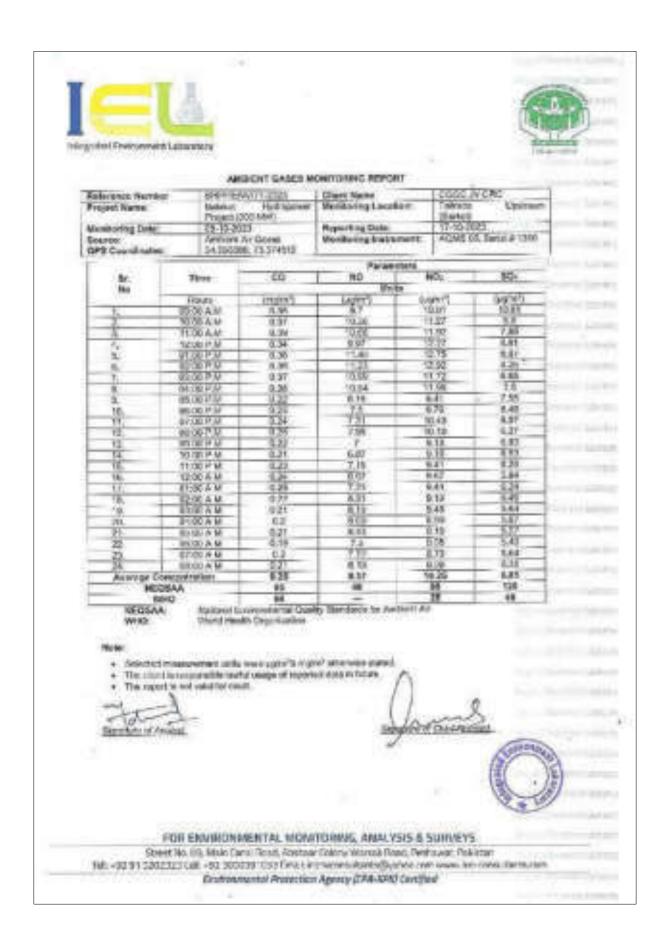


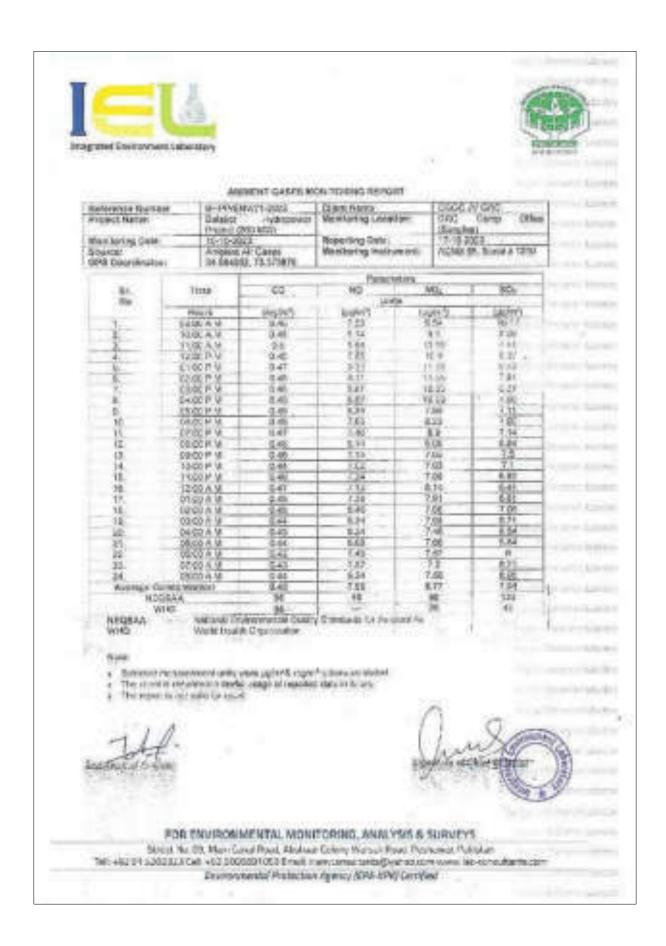


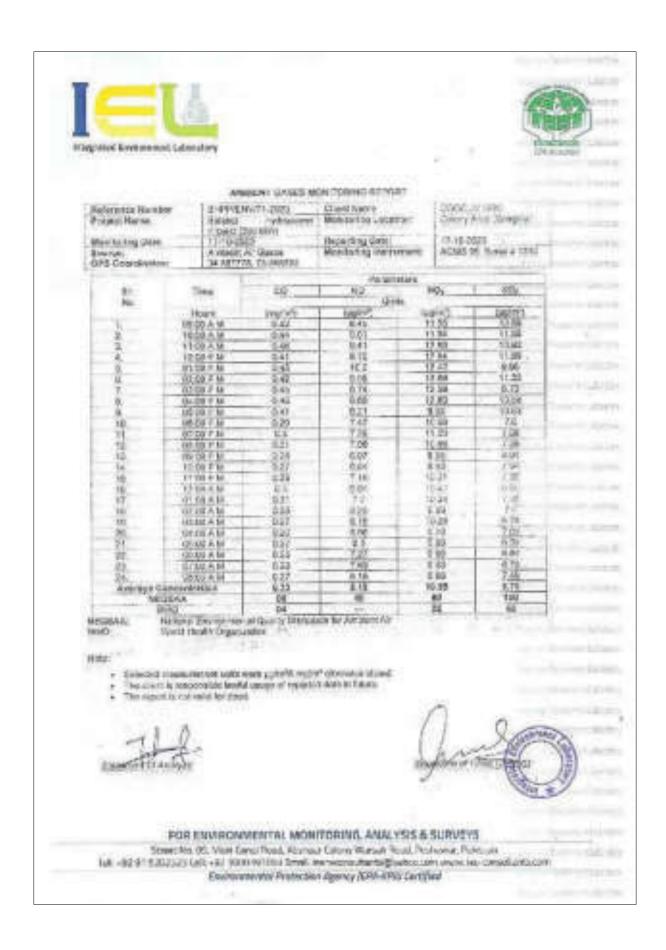


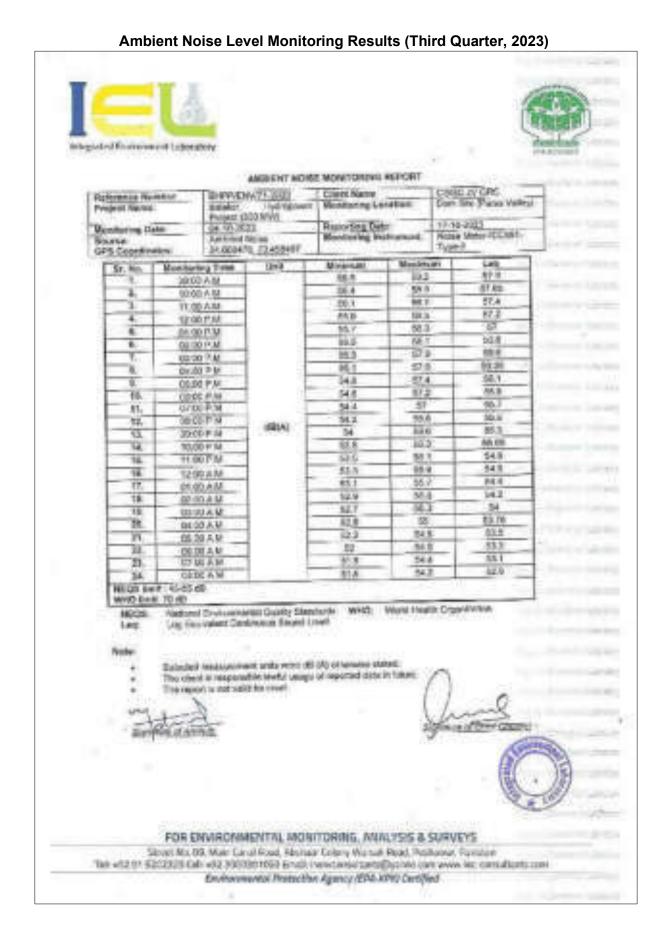


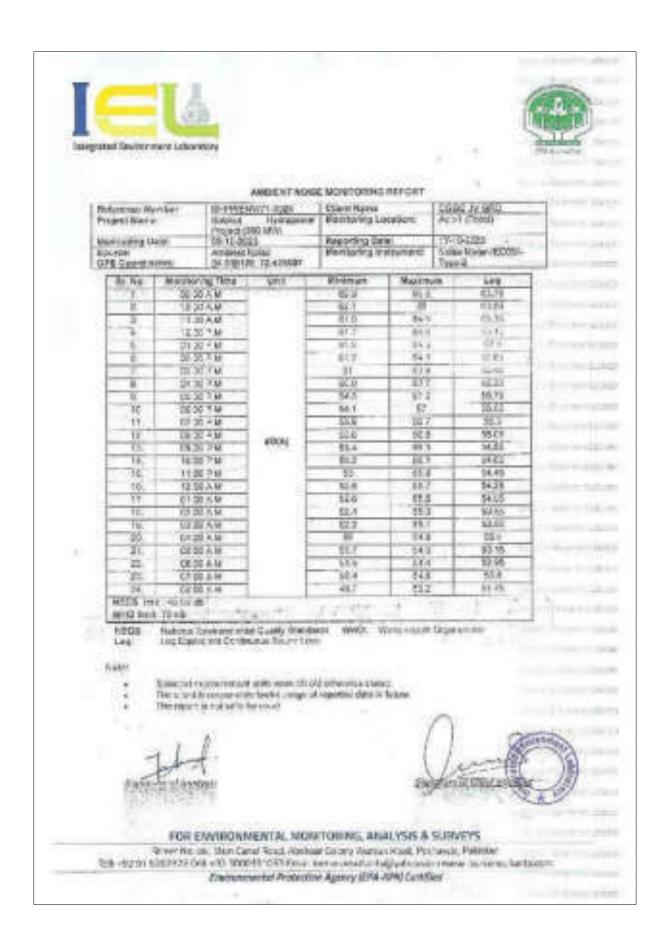


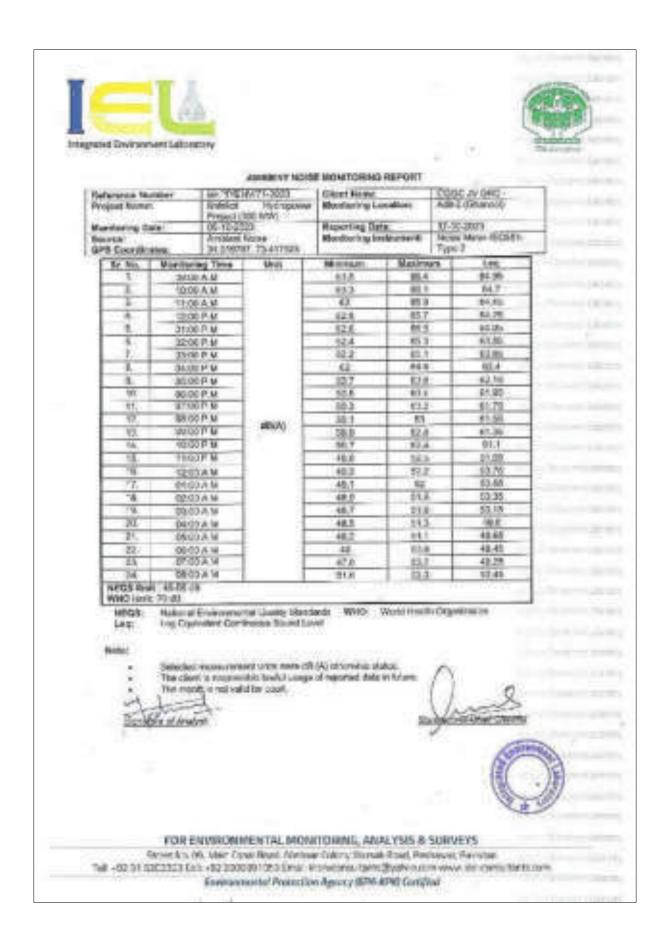


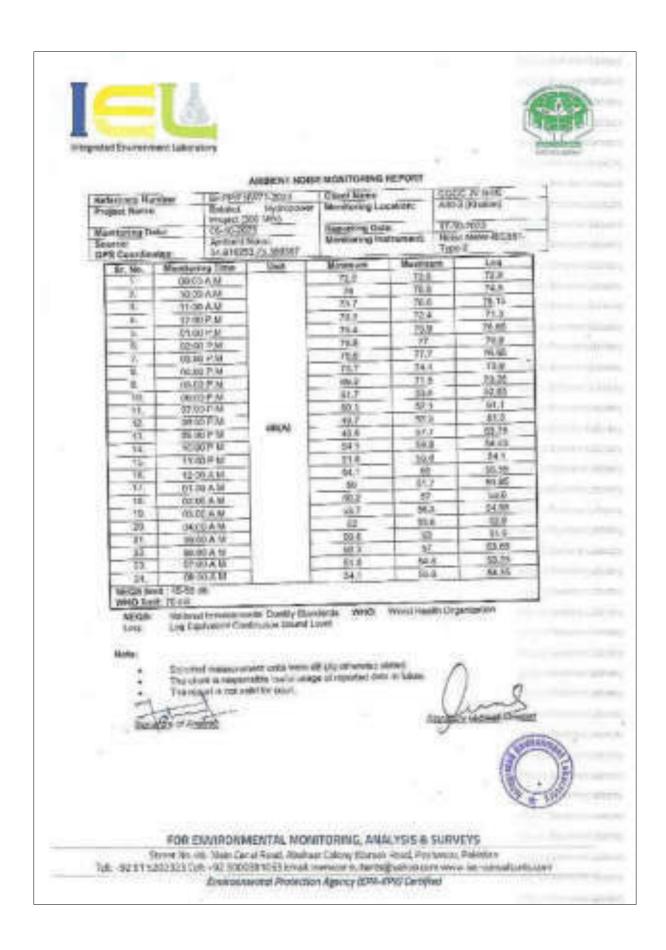


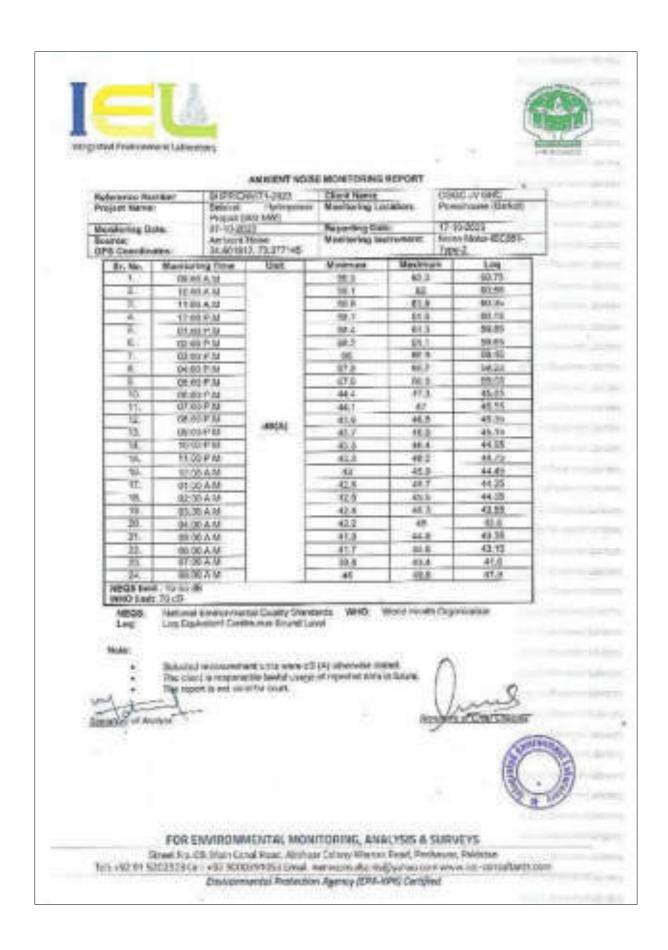


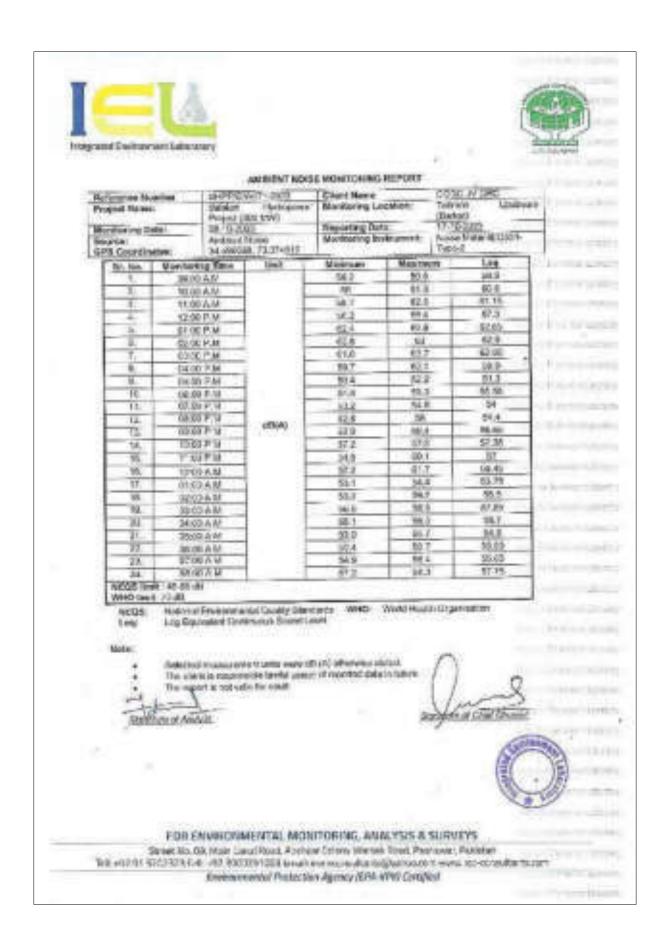


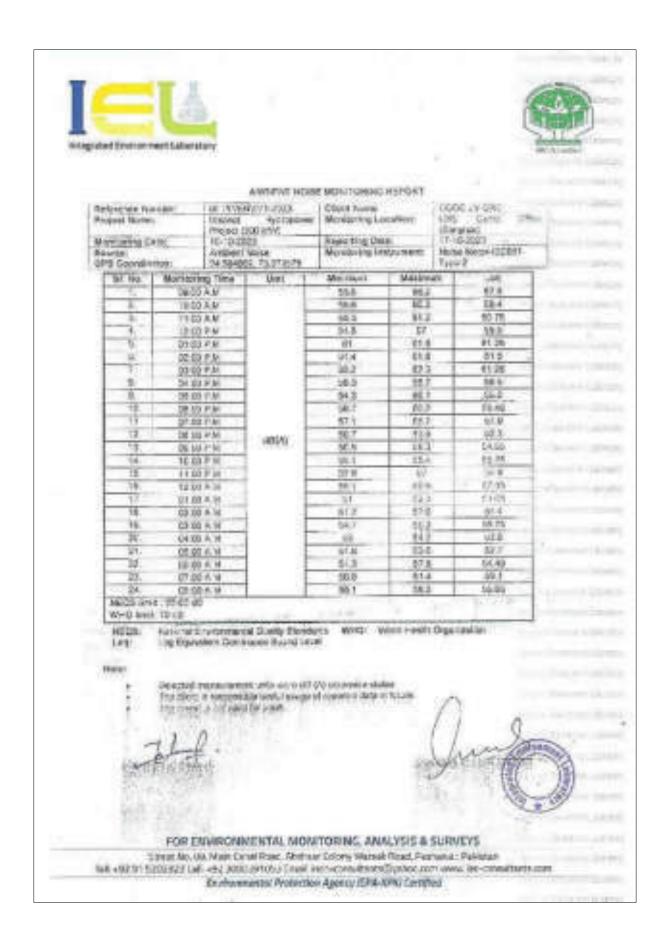


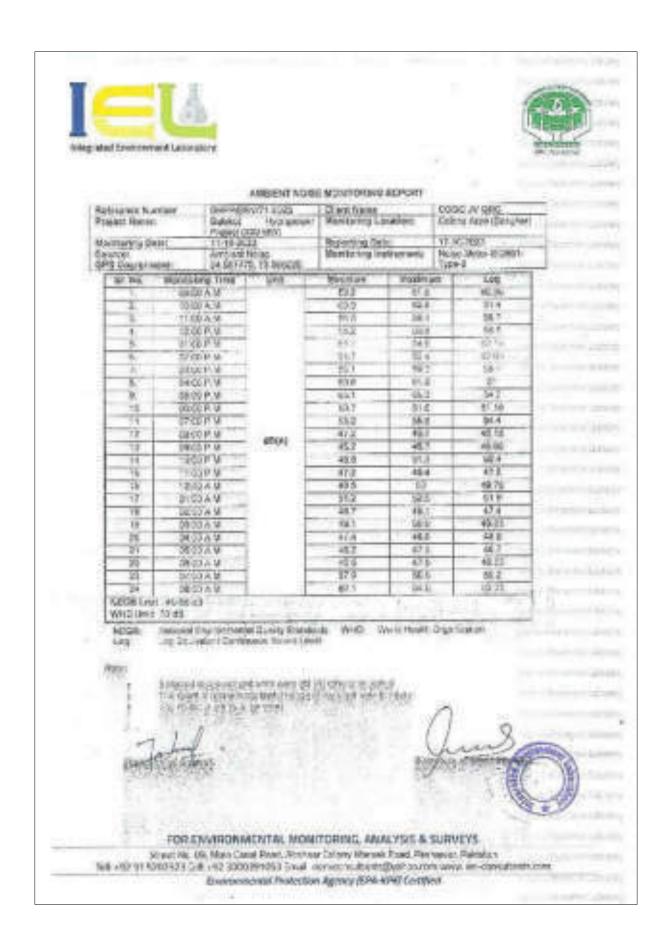


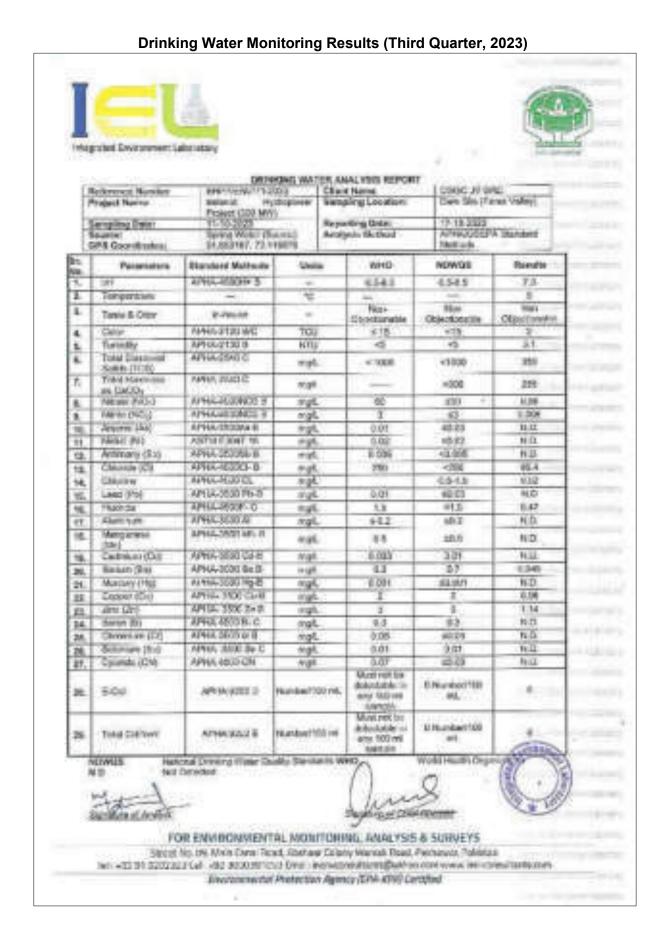


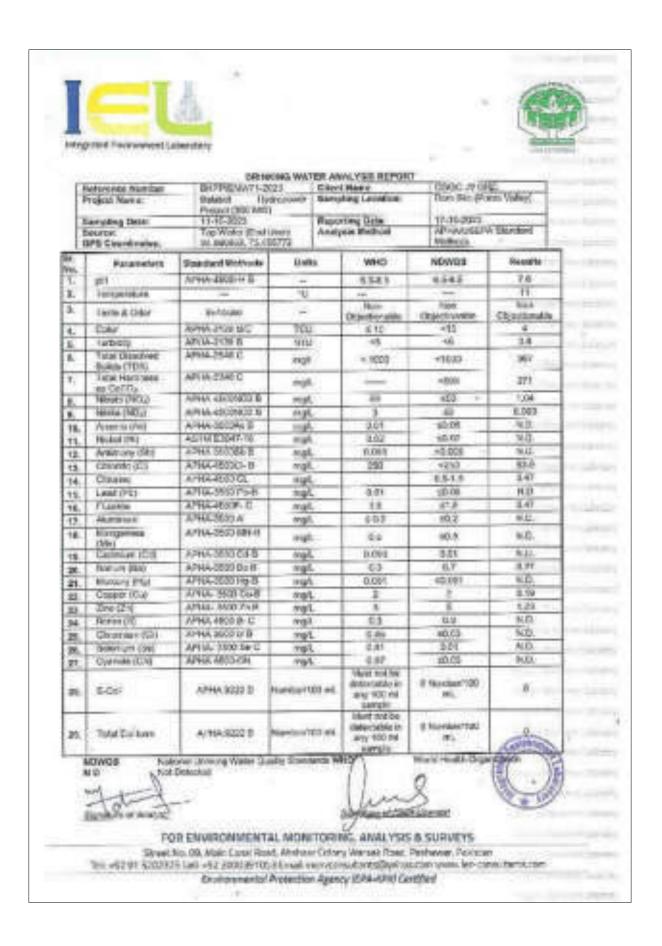


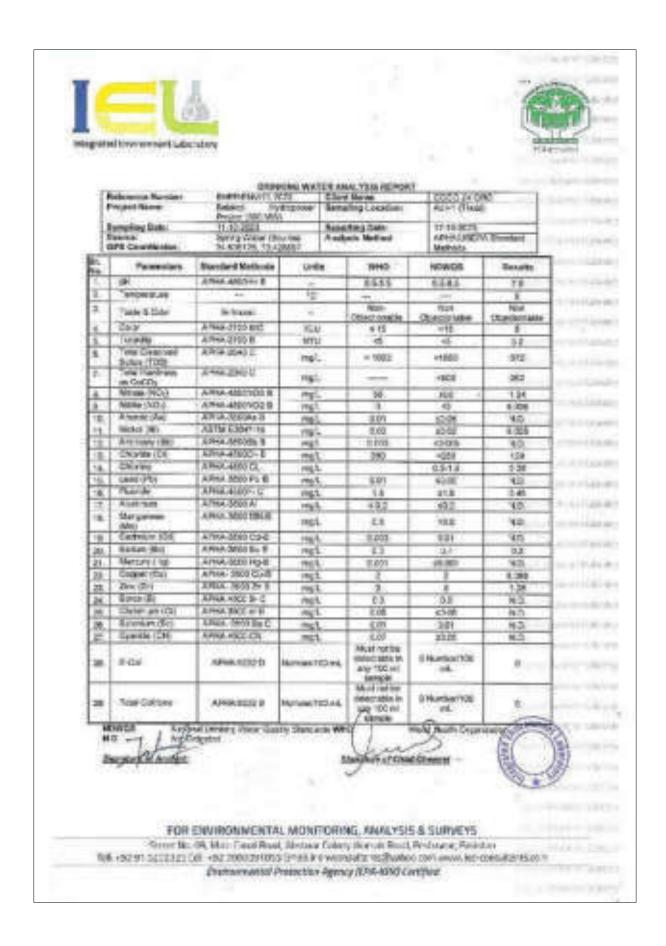


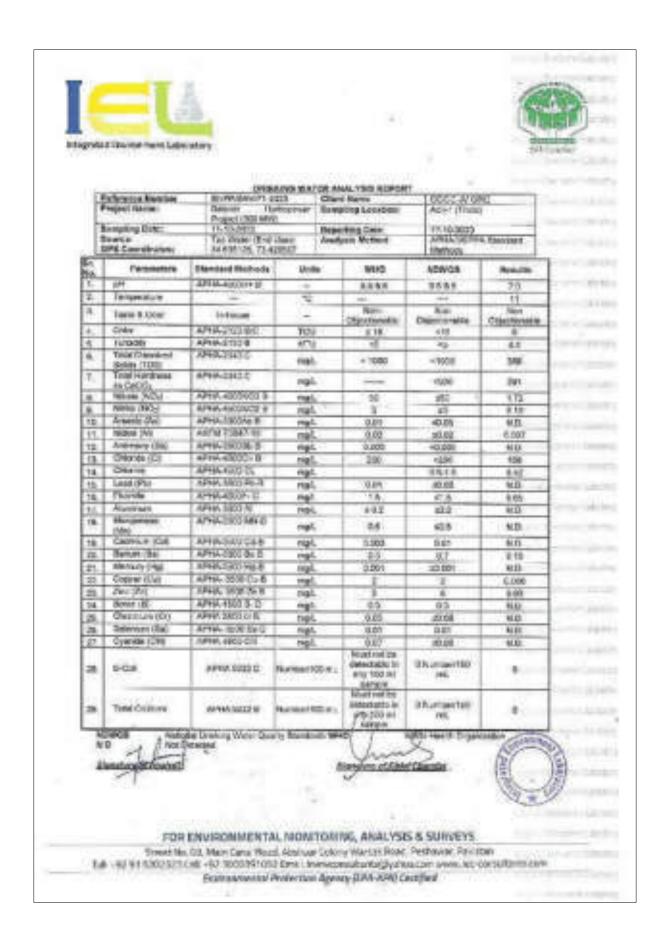


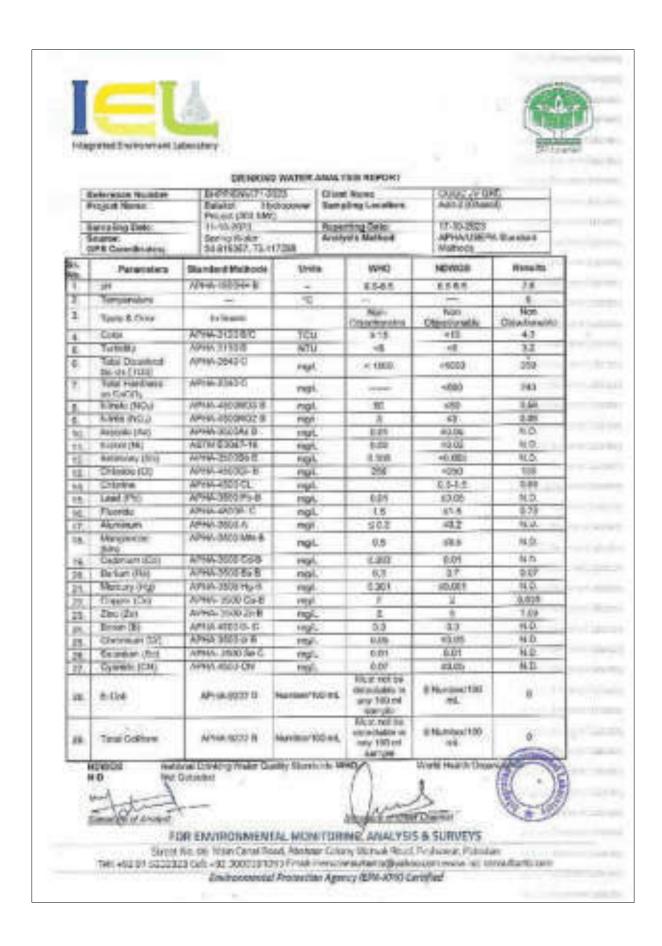


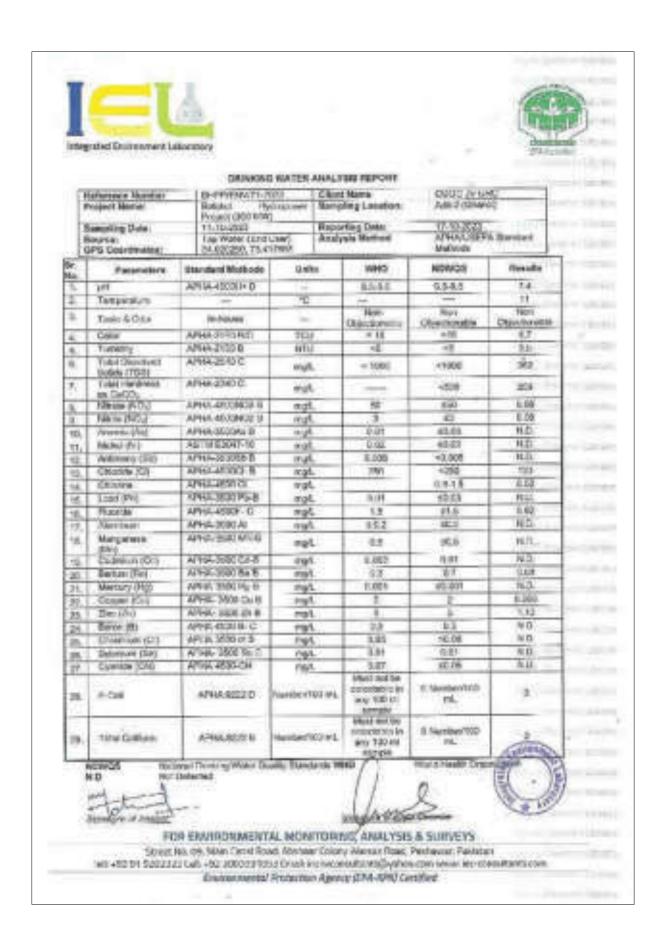


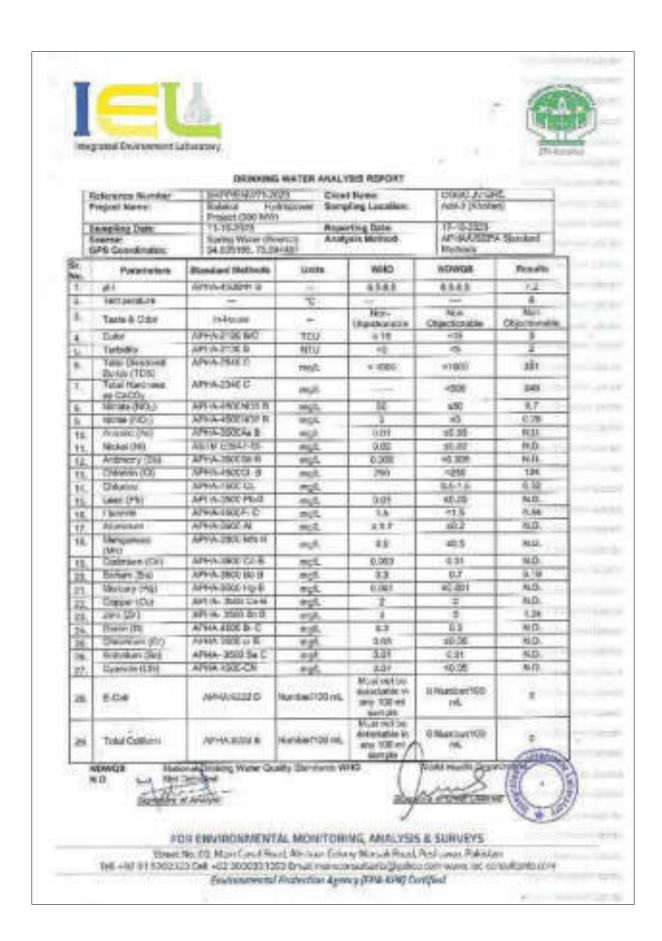


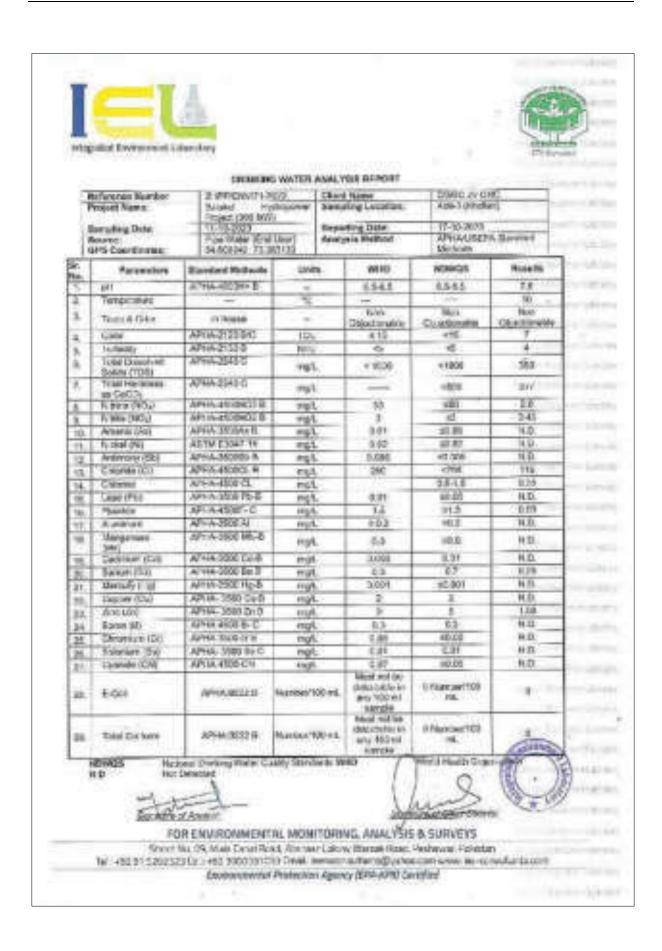


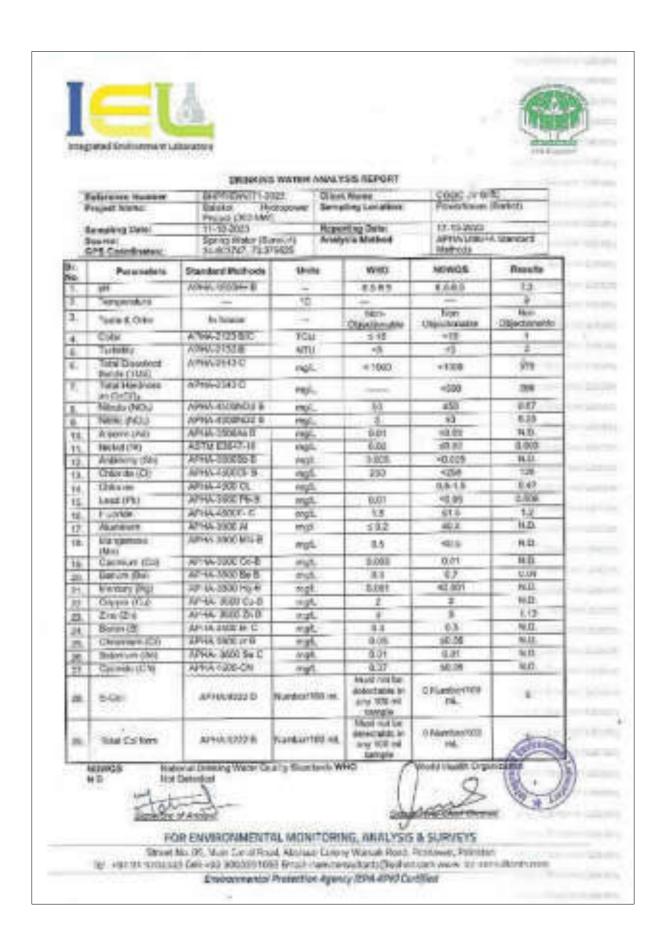


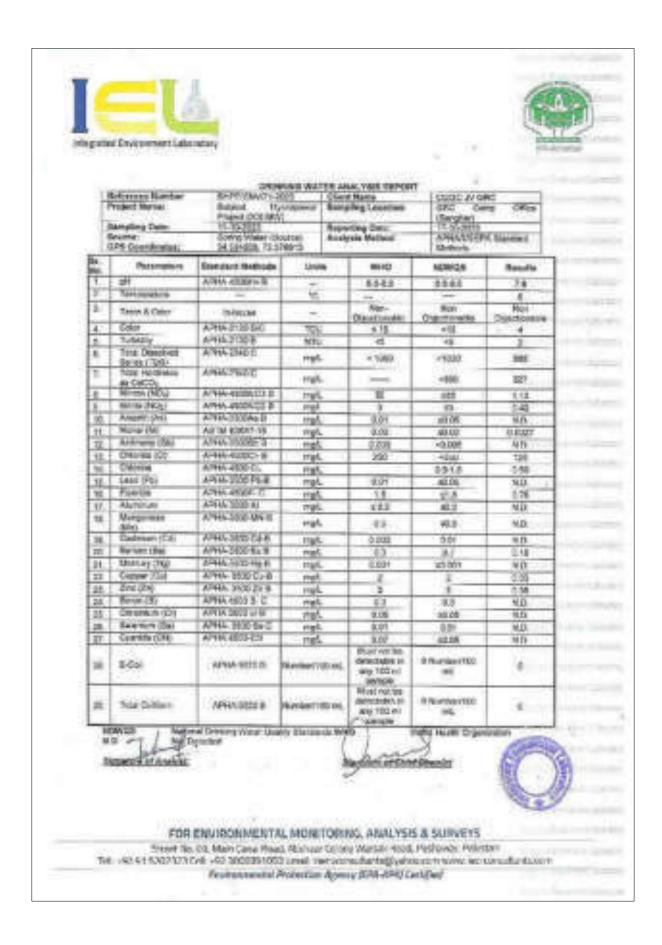


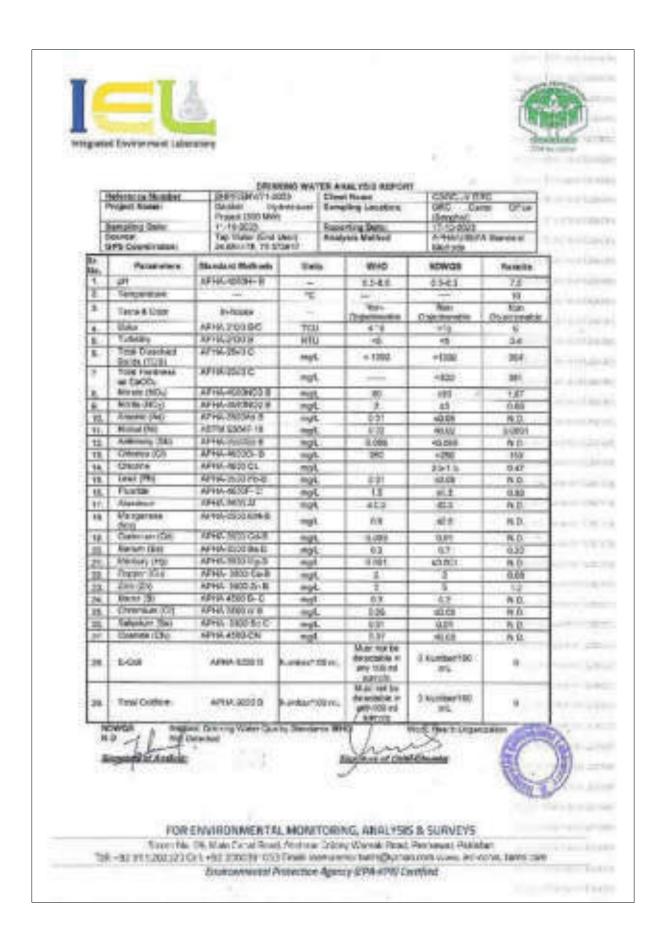




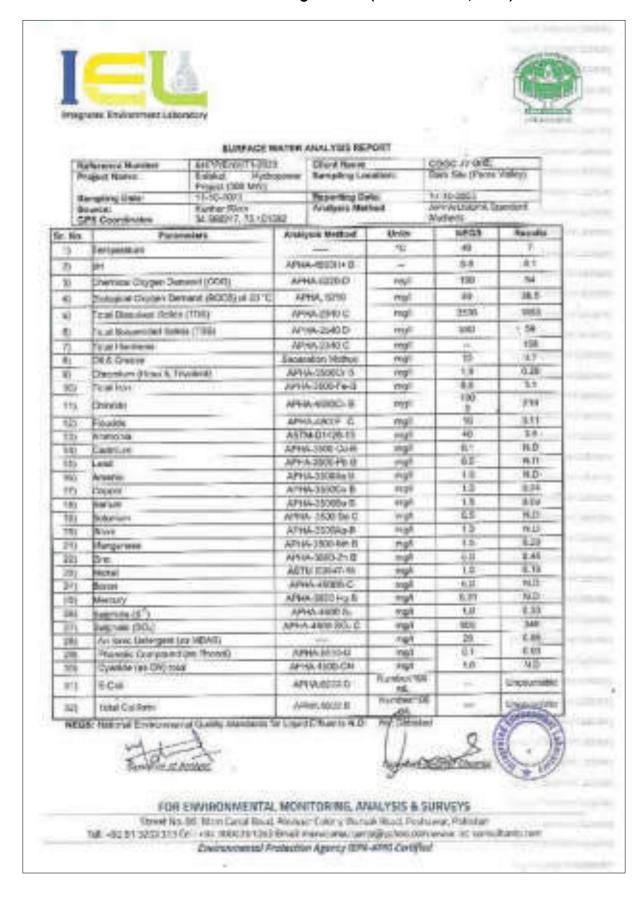




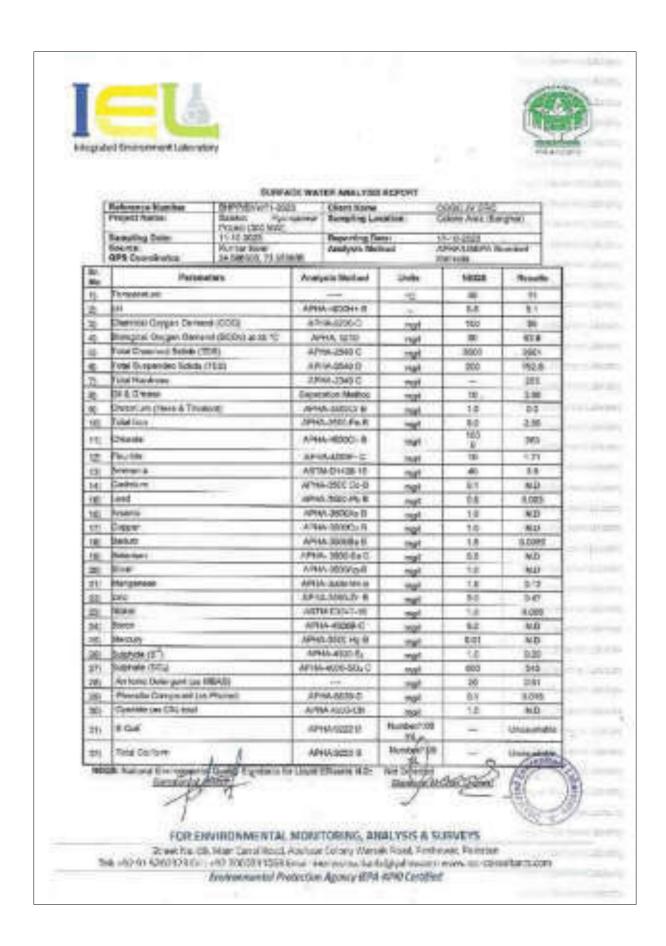




Surface Water Monitoring Results (Third Quarter, 2023)

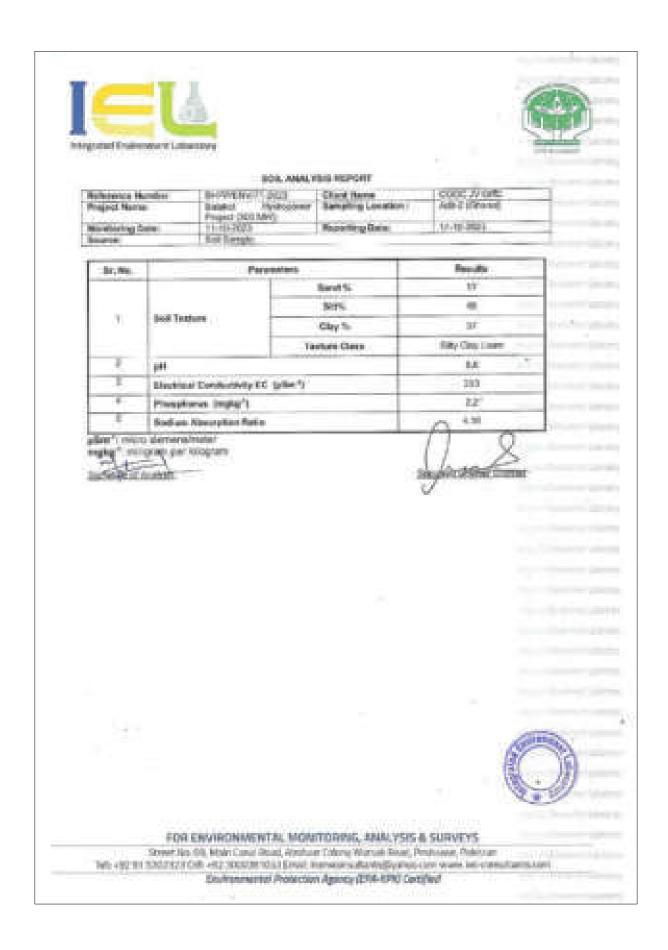


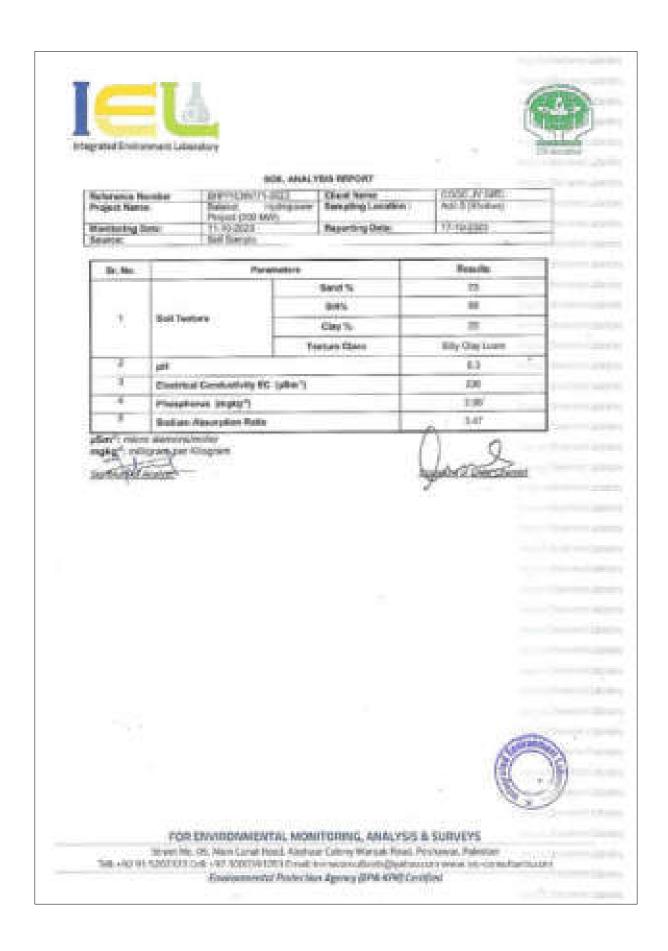




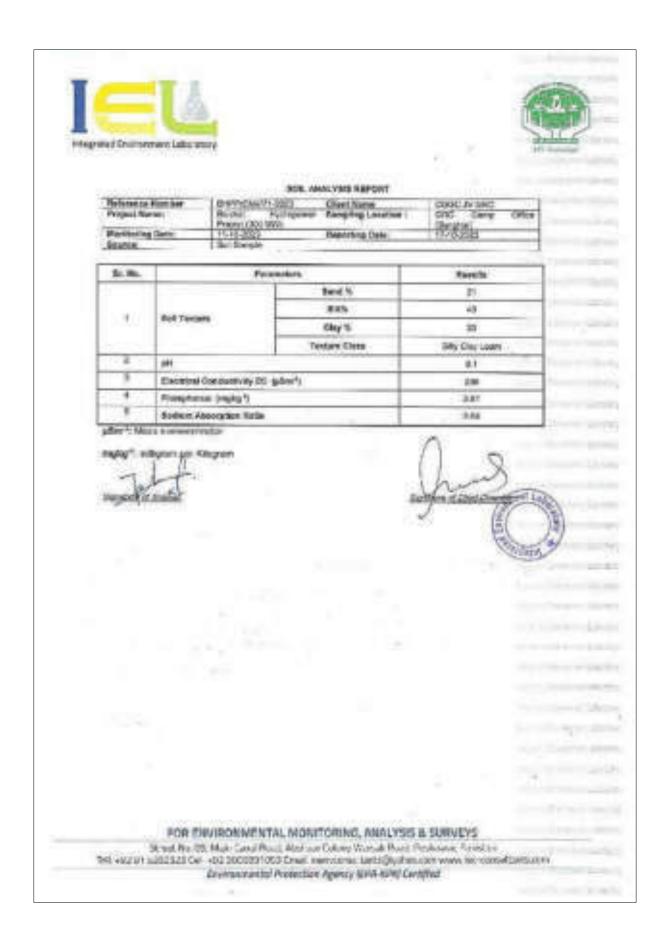
Soil Analysis Results (Third Quarter, 2023)



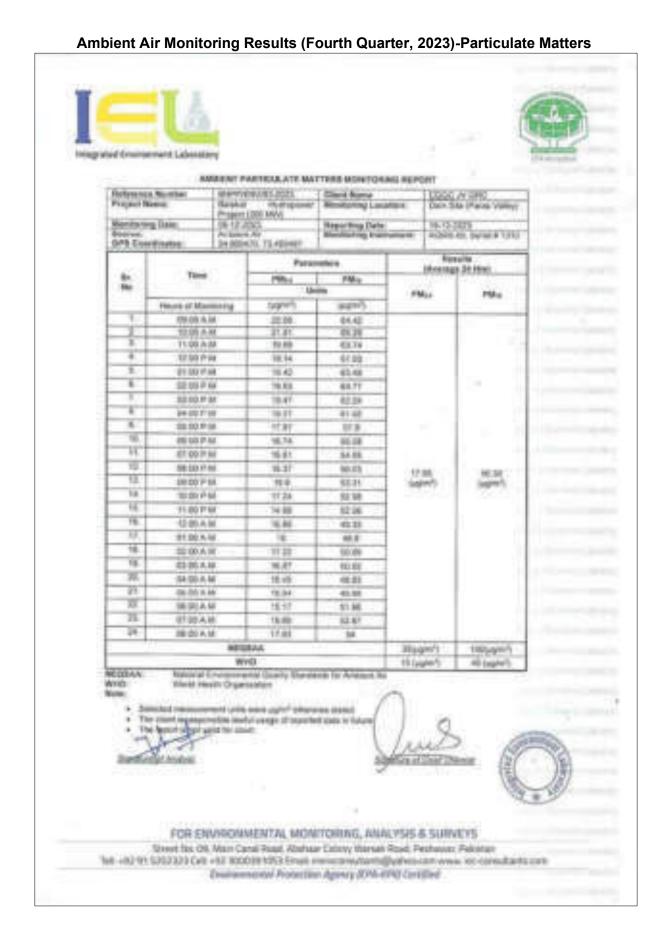




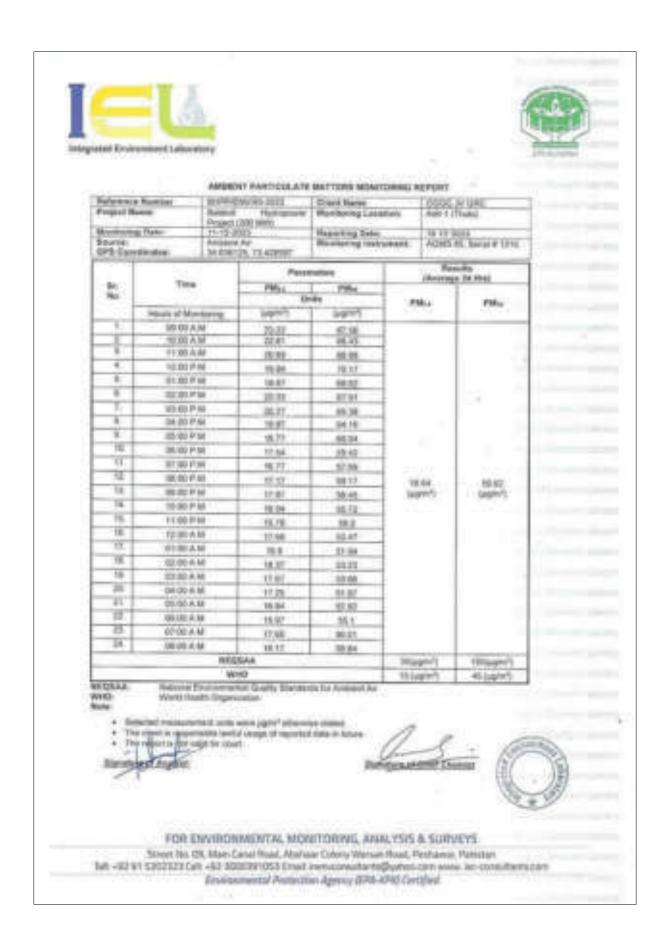


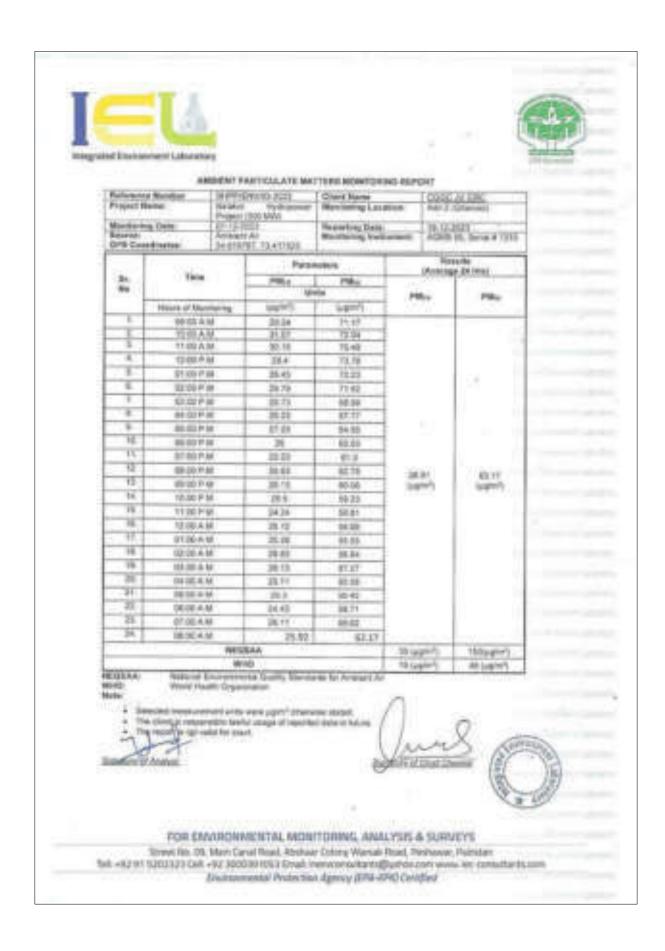


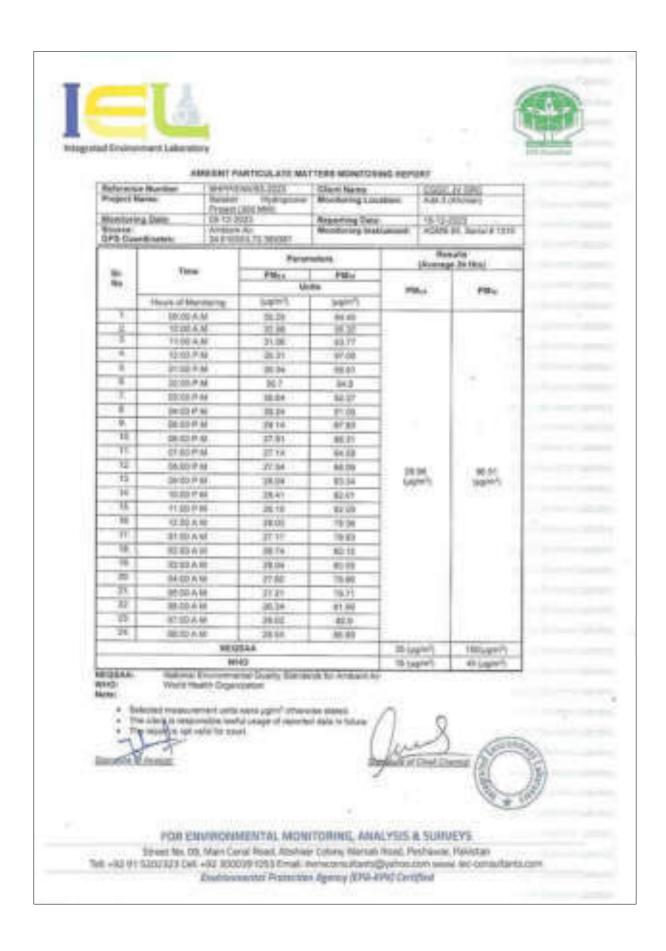
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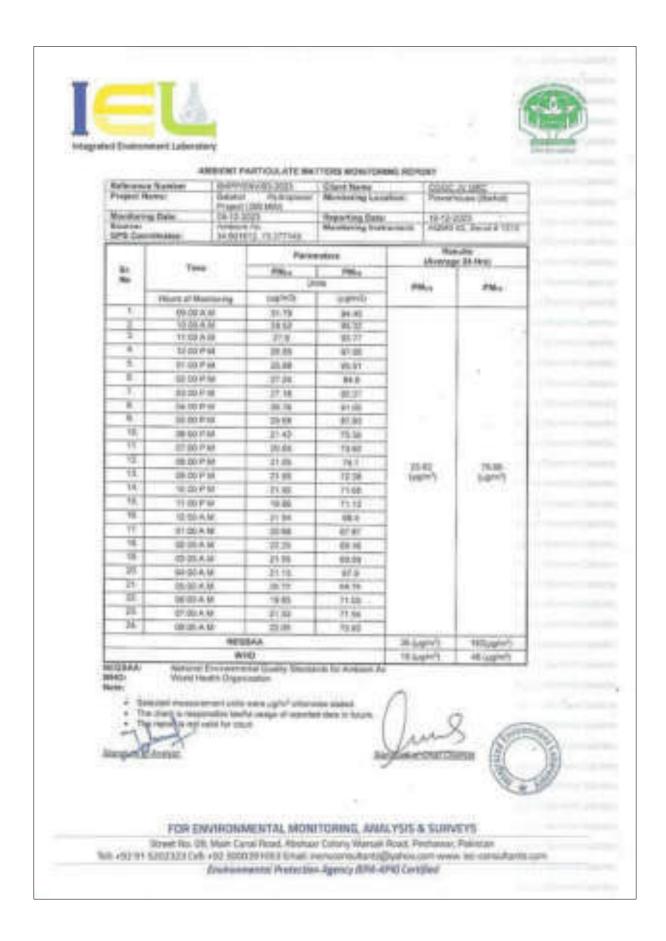


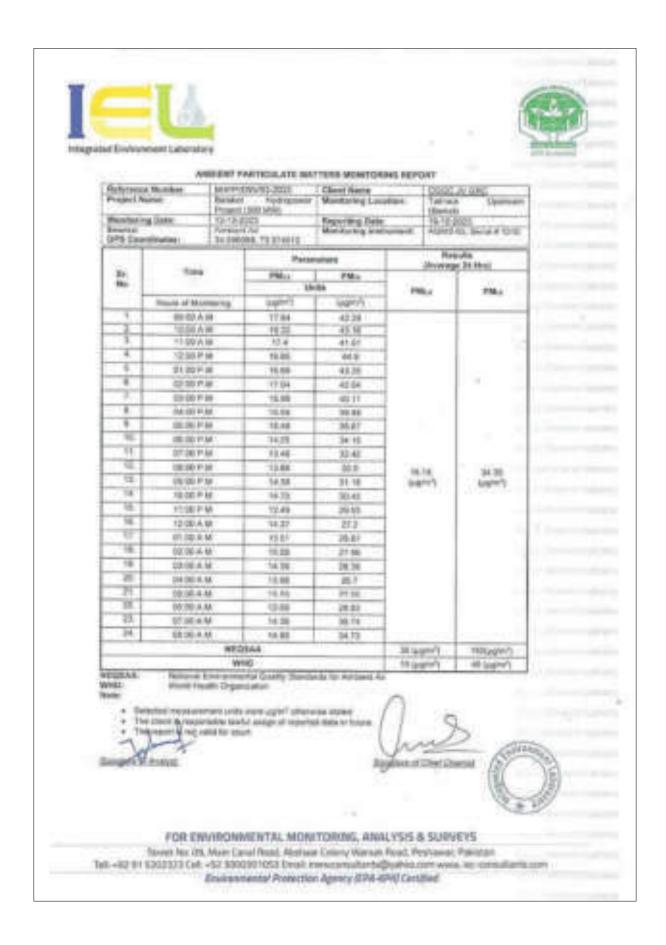
Annexure-04

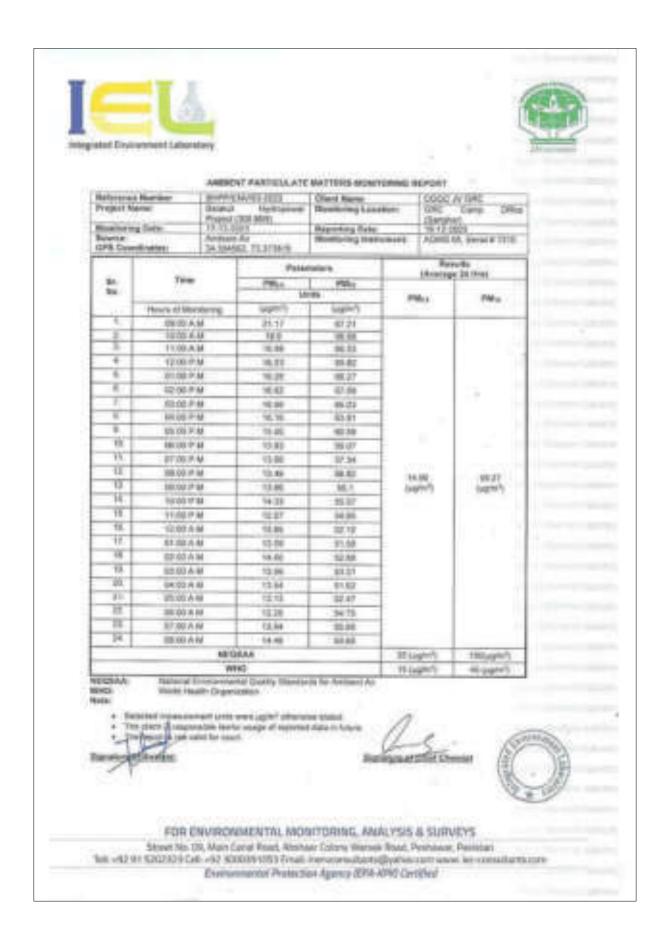


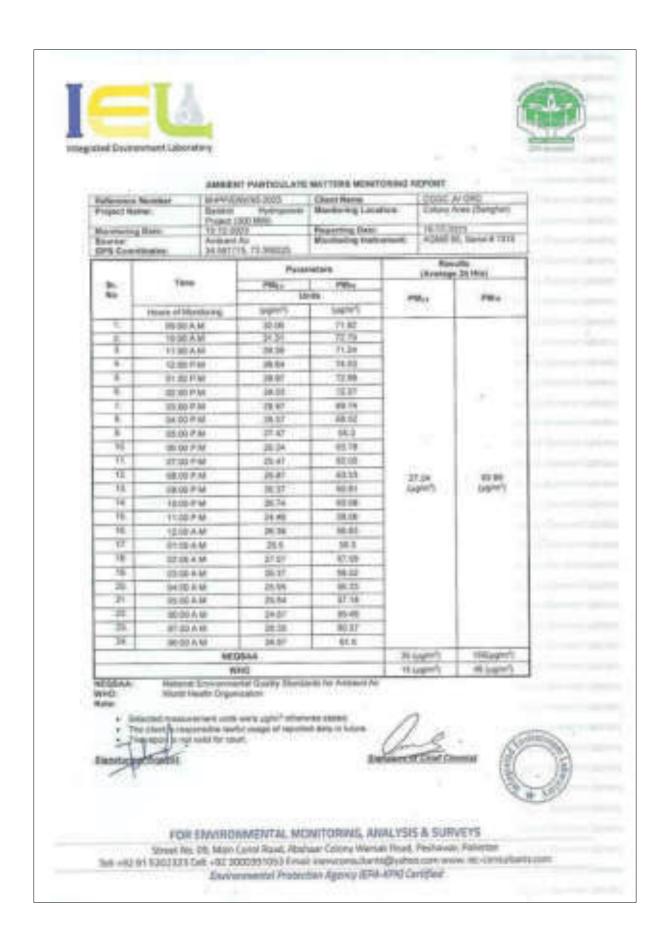








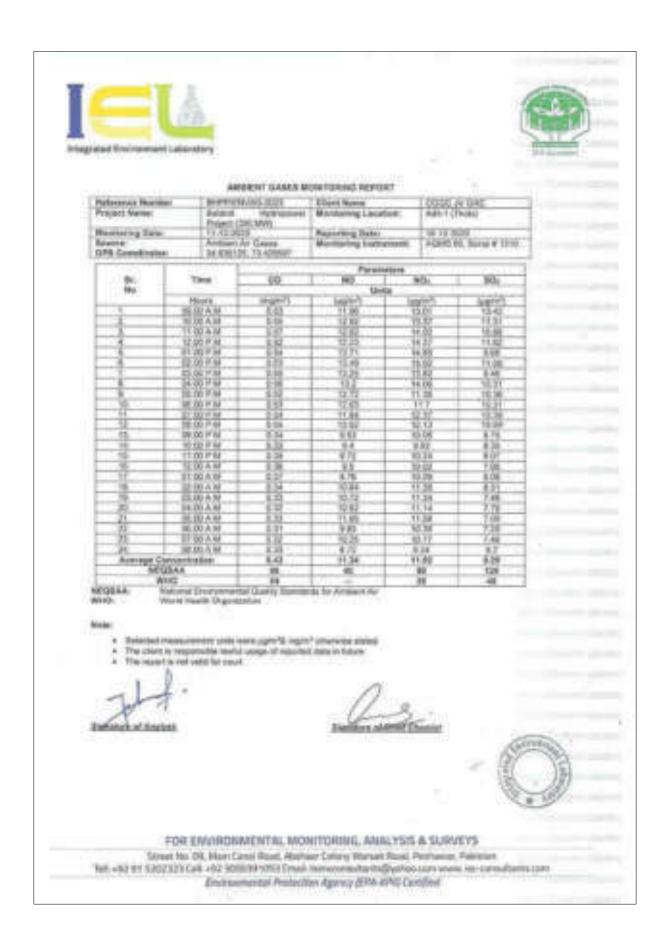


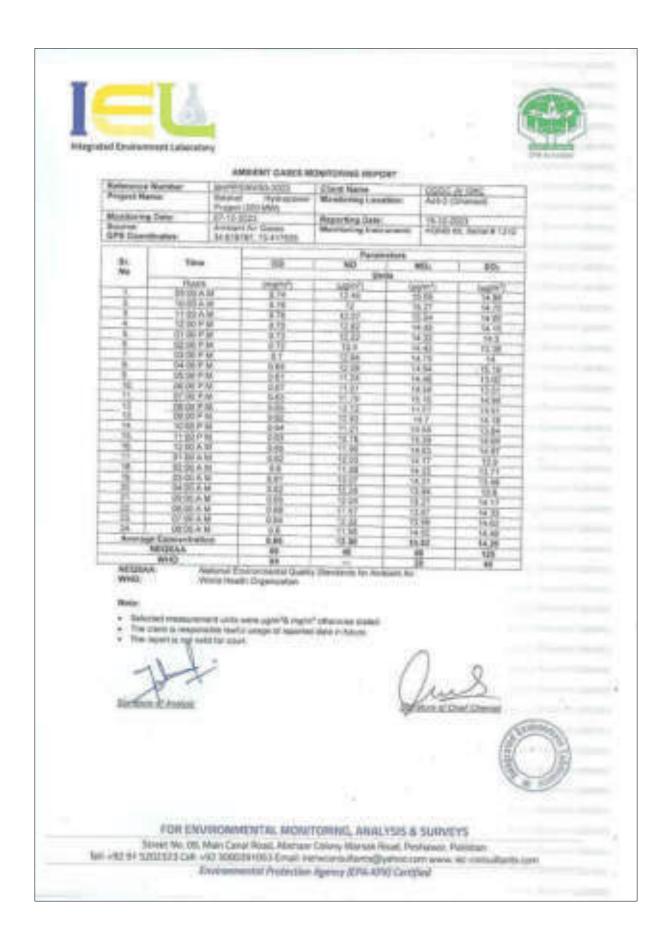


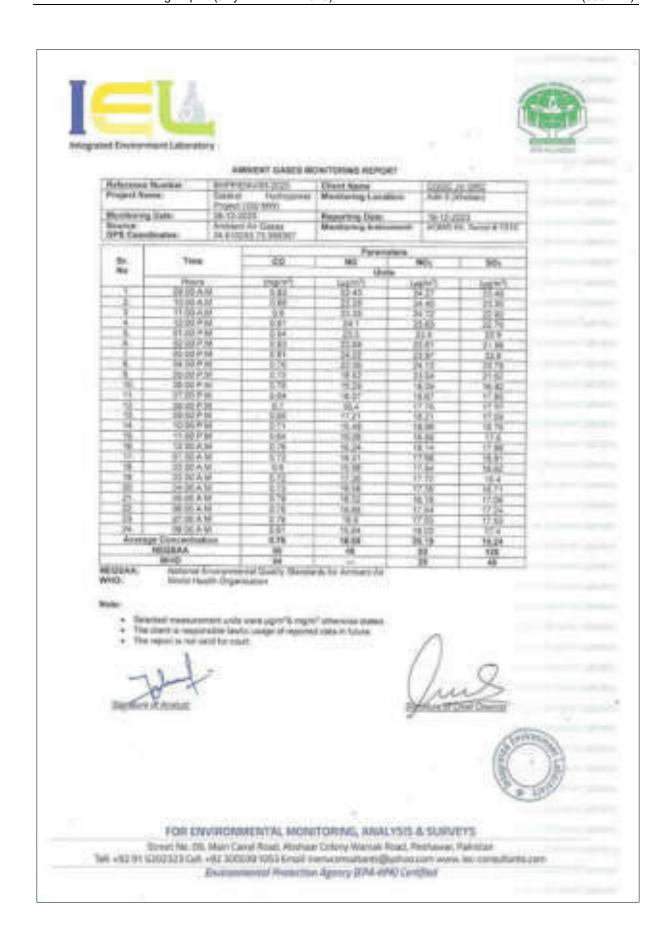
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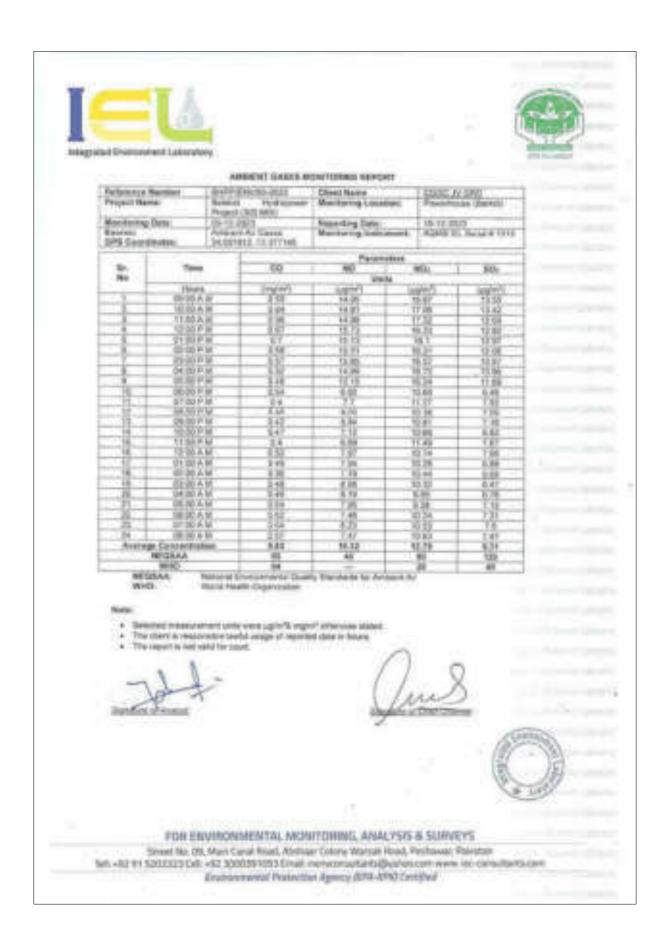


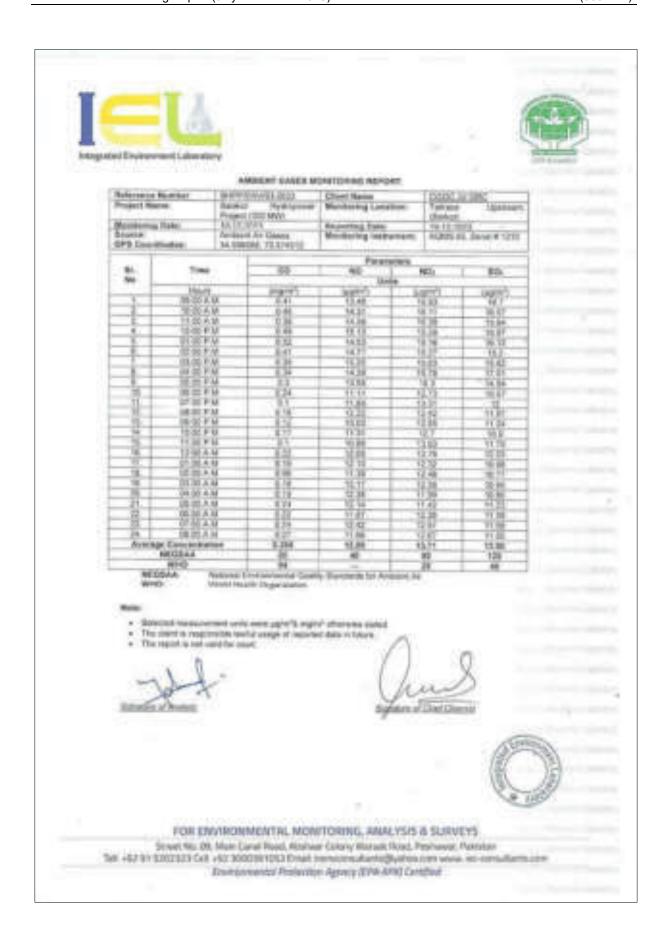
Annexure-04

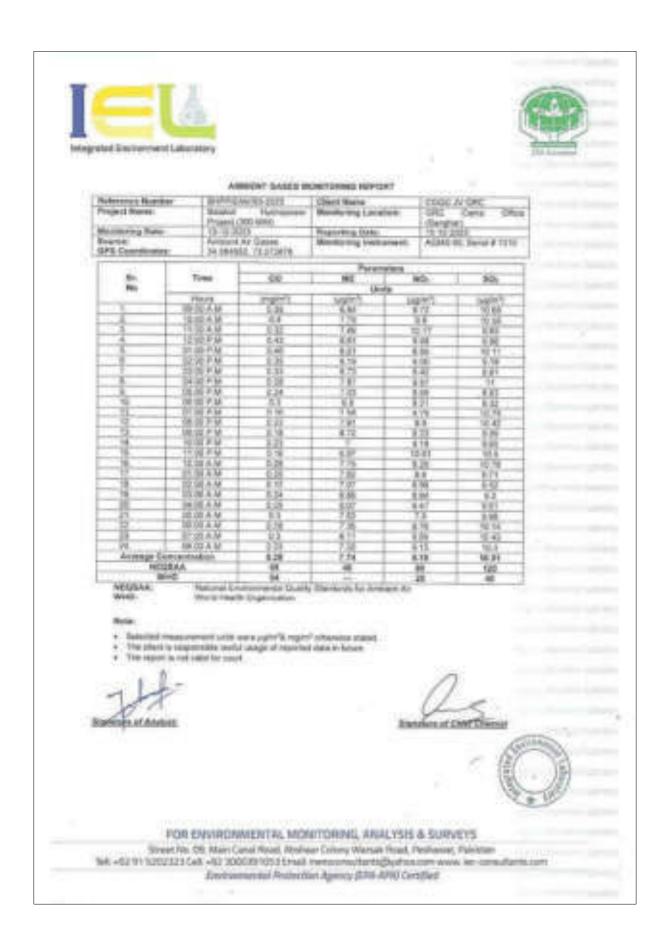


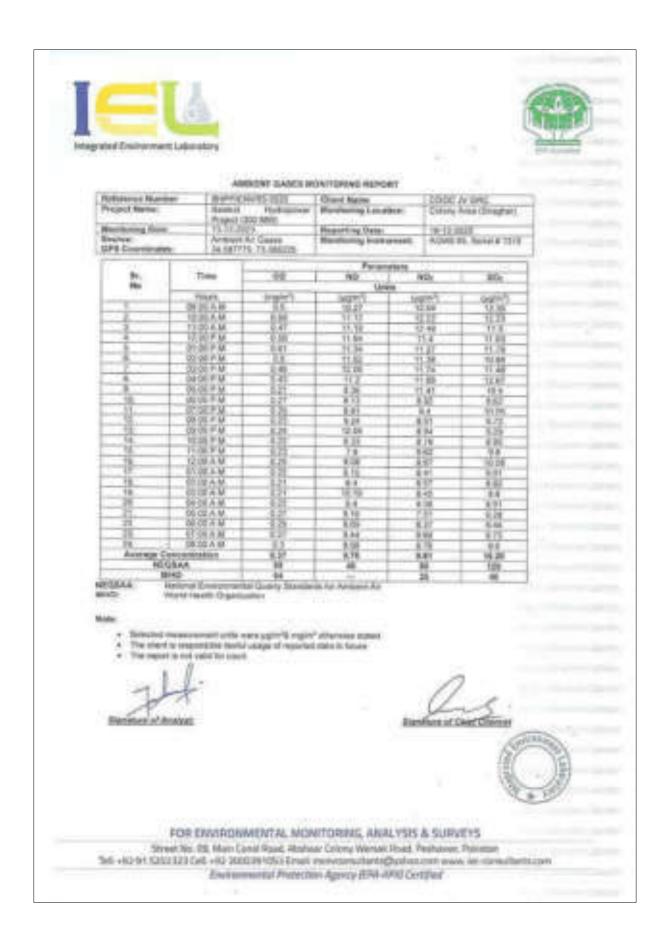


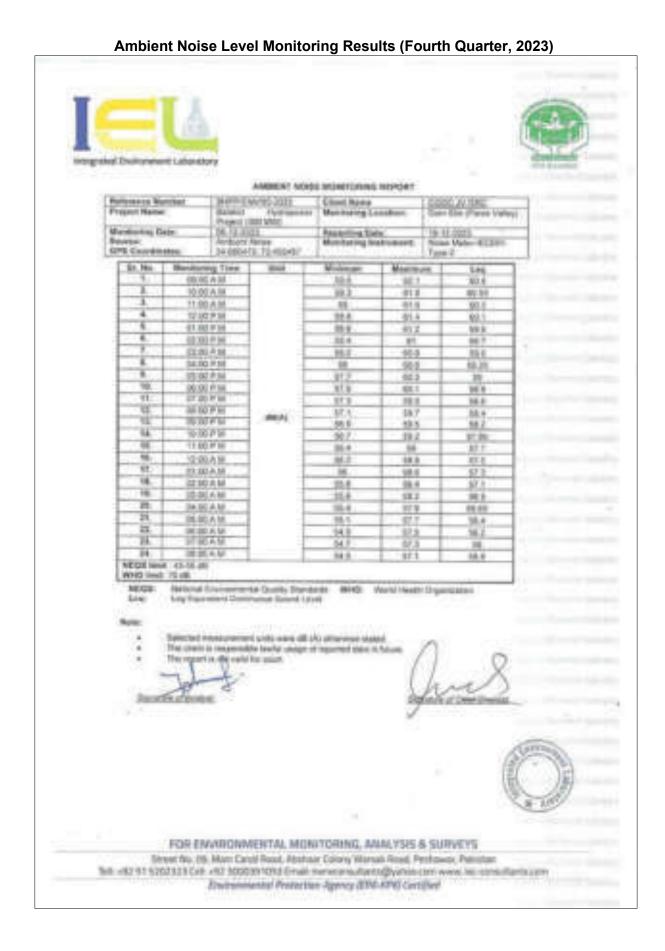


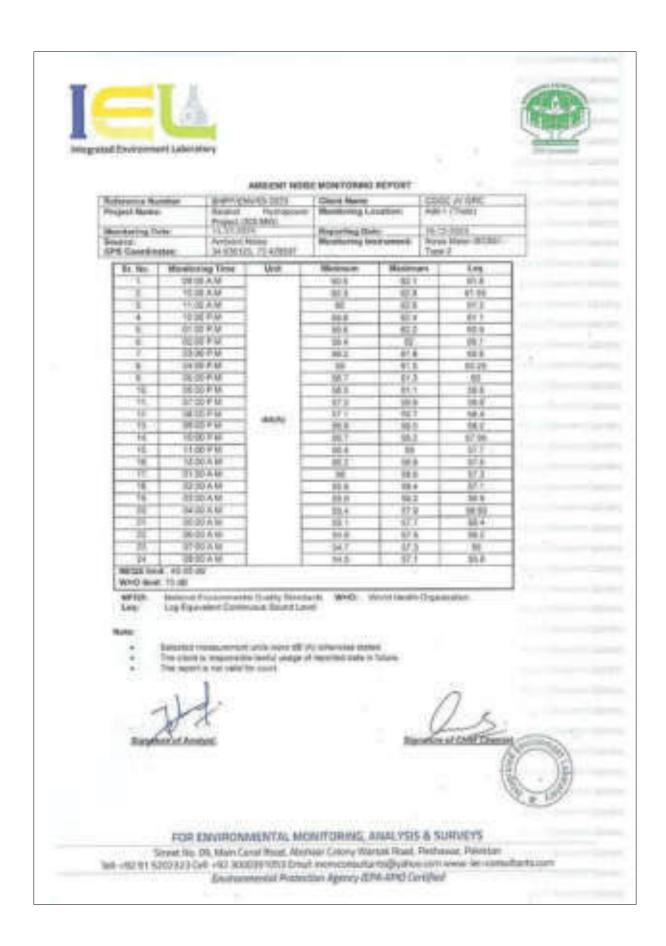


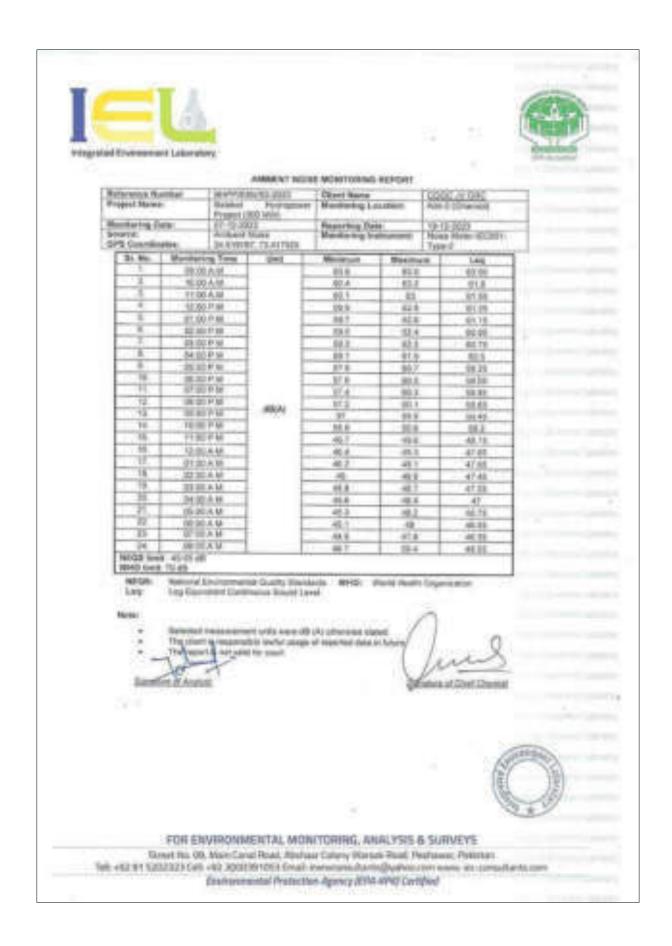


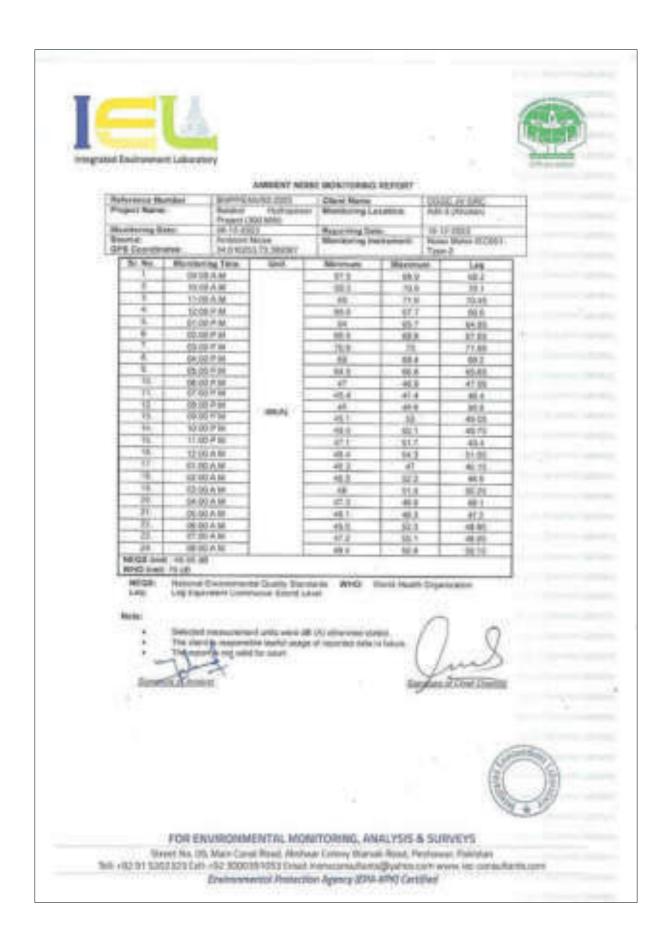


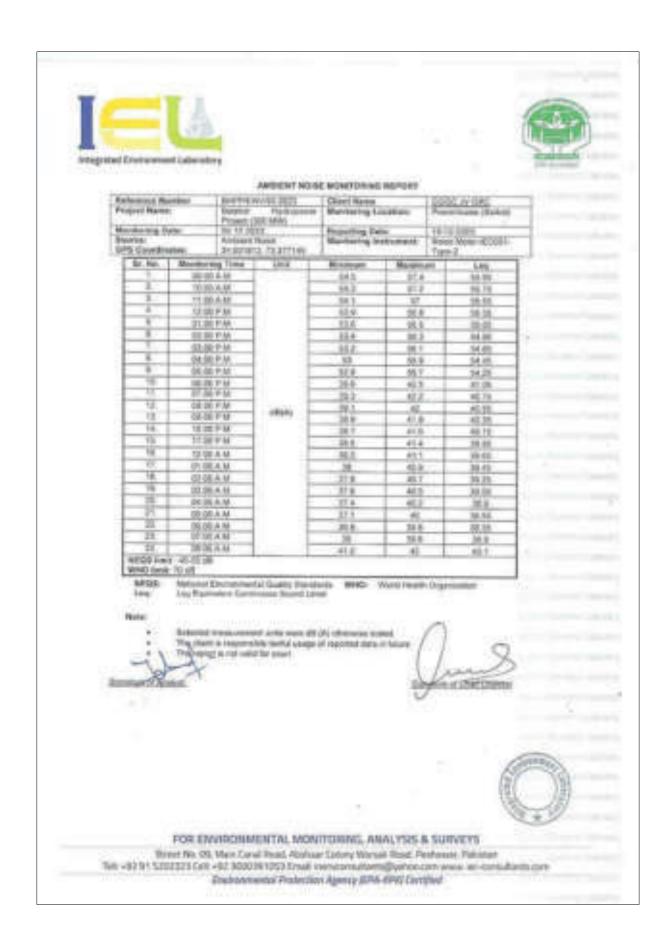


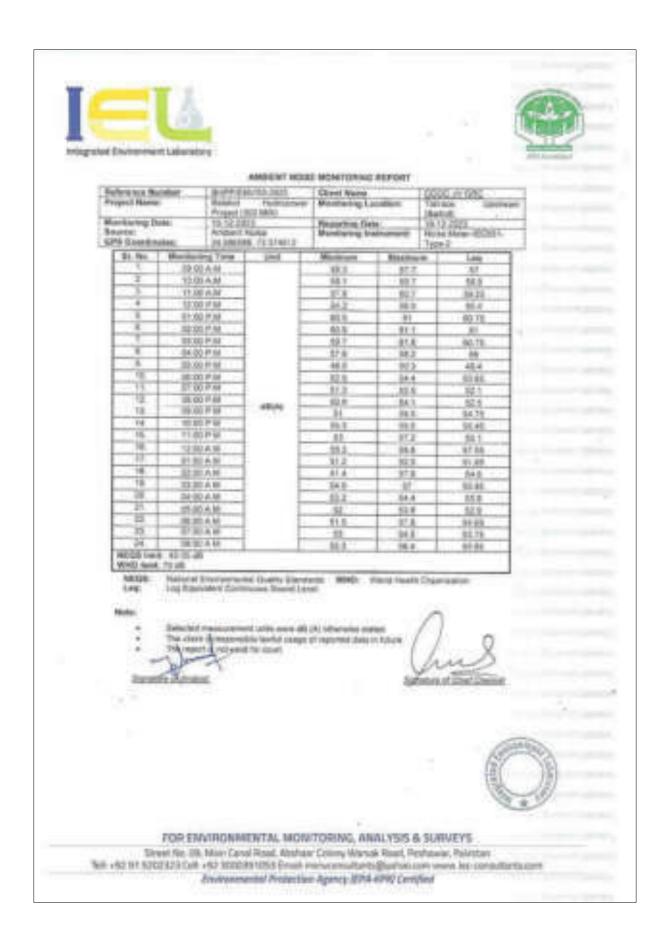


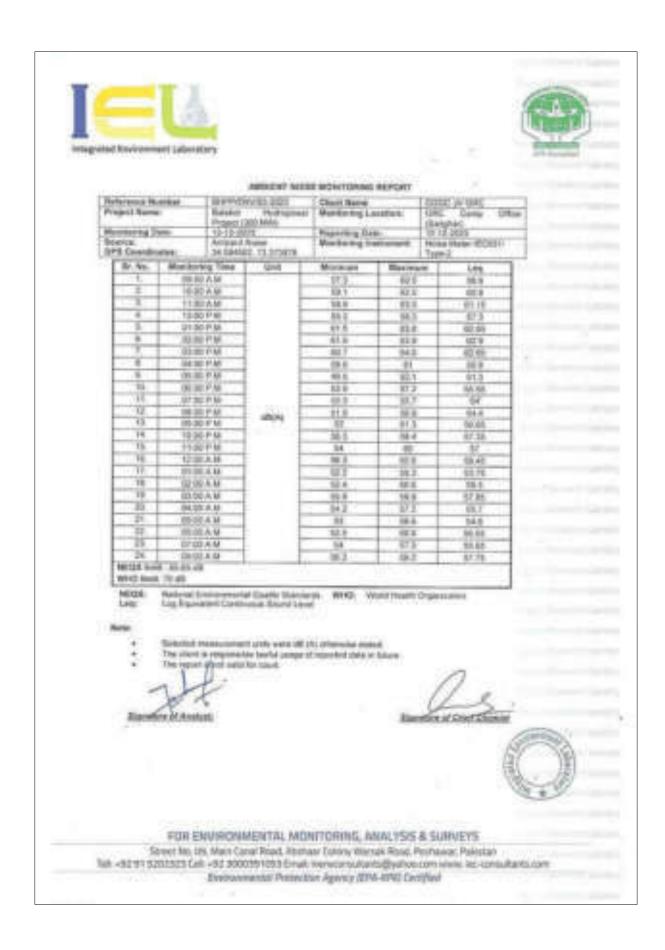


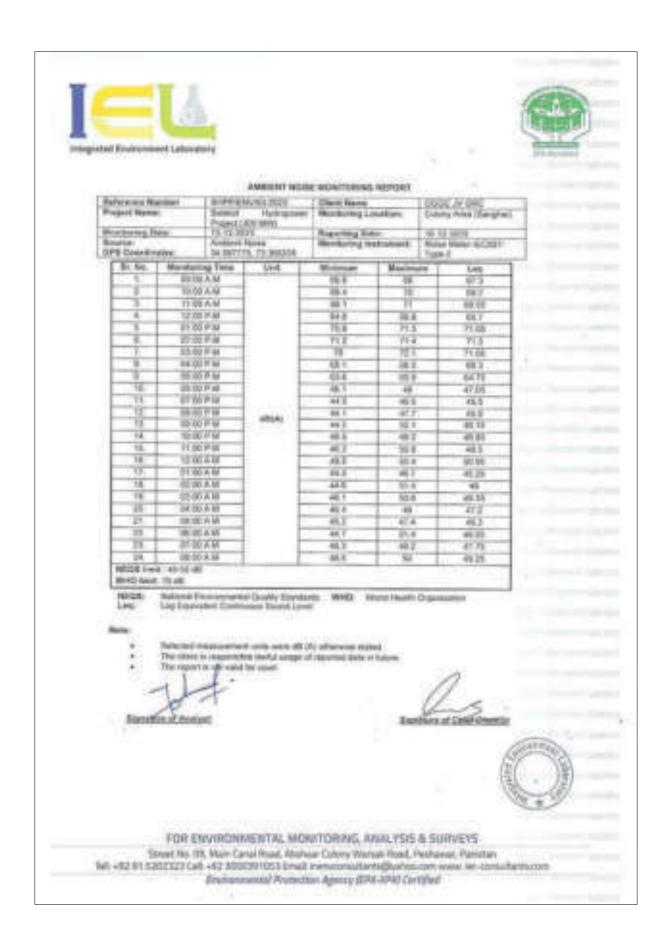


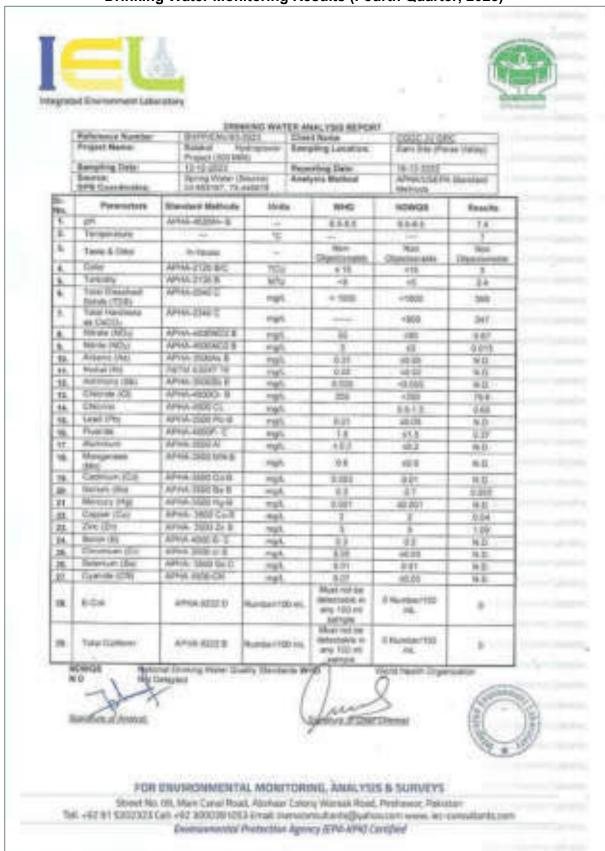






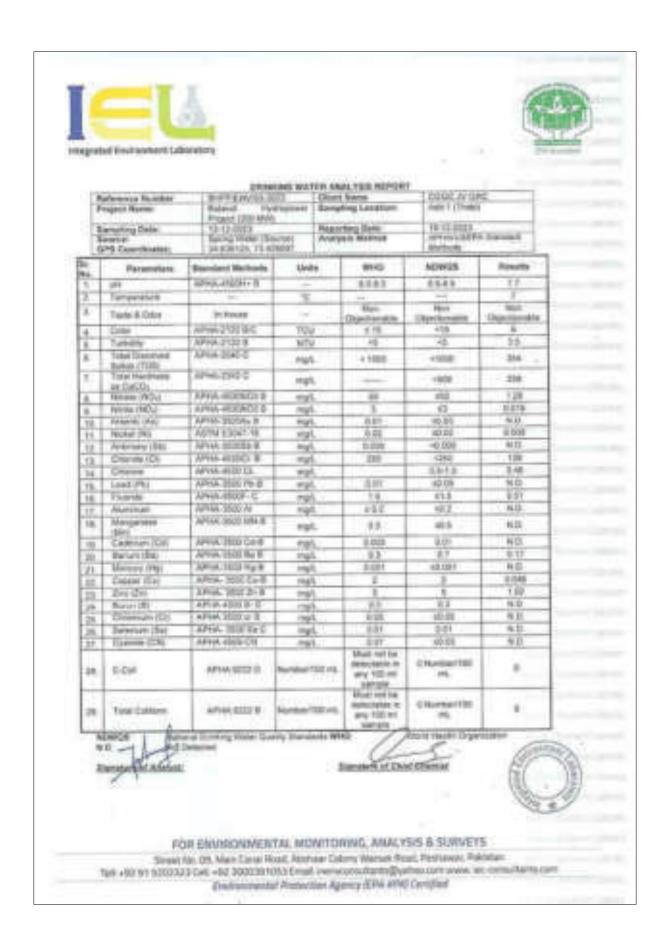


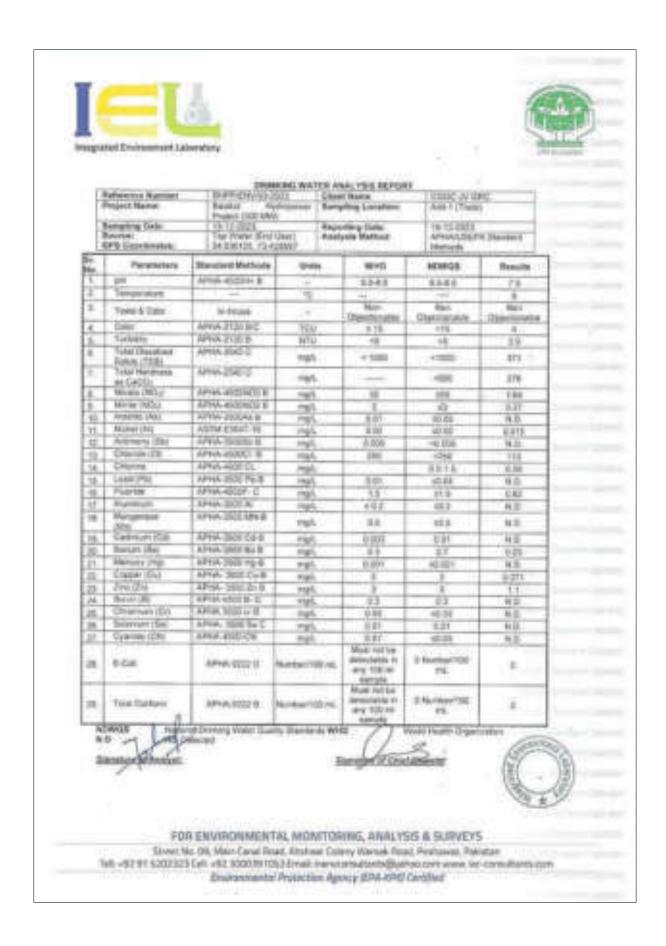


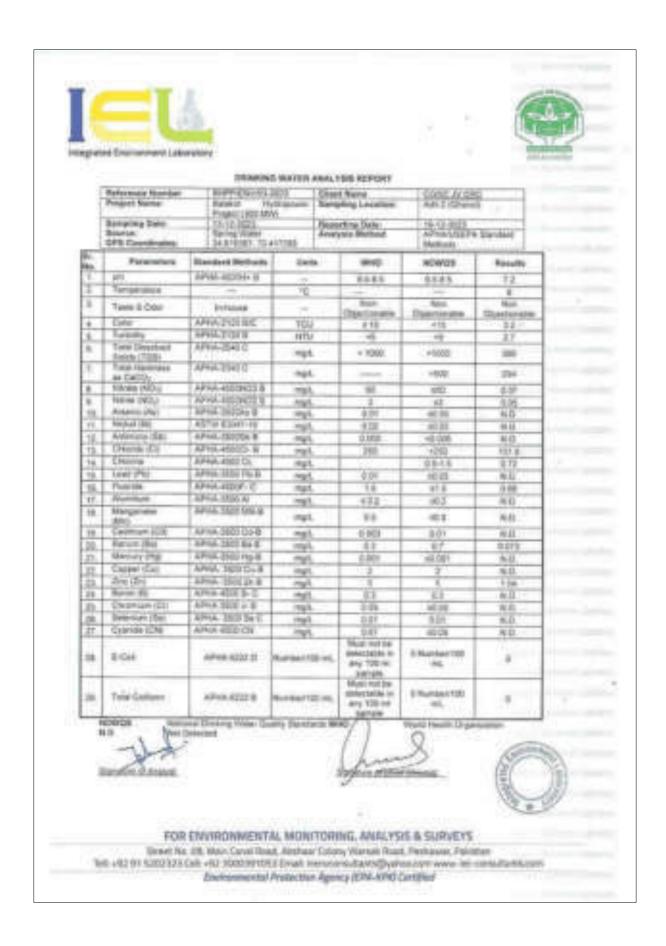


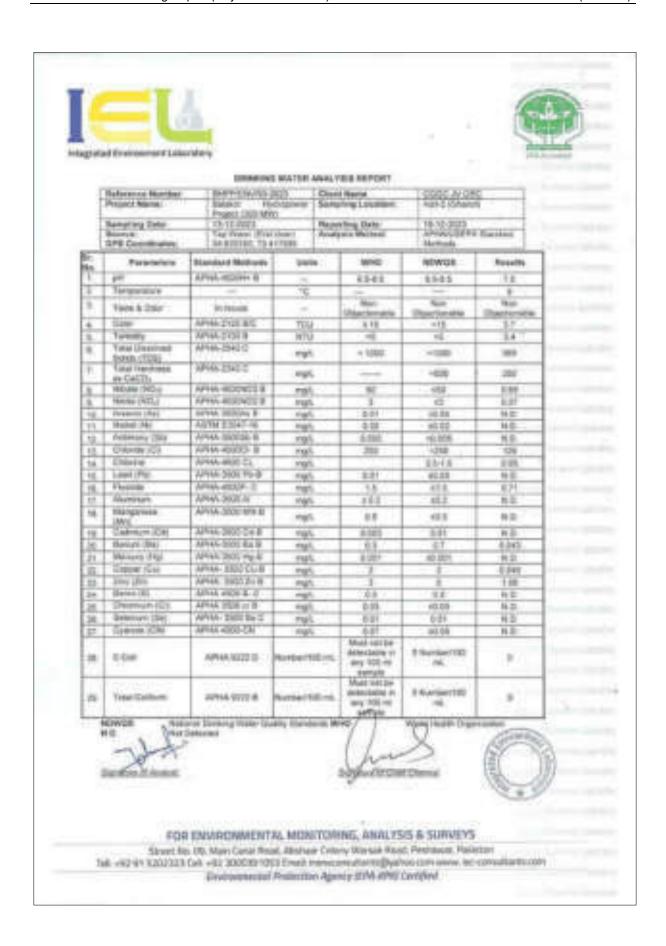
Drinking Water Monitoring Results (Fourth Quarter, 2023)

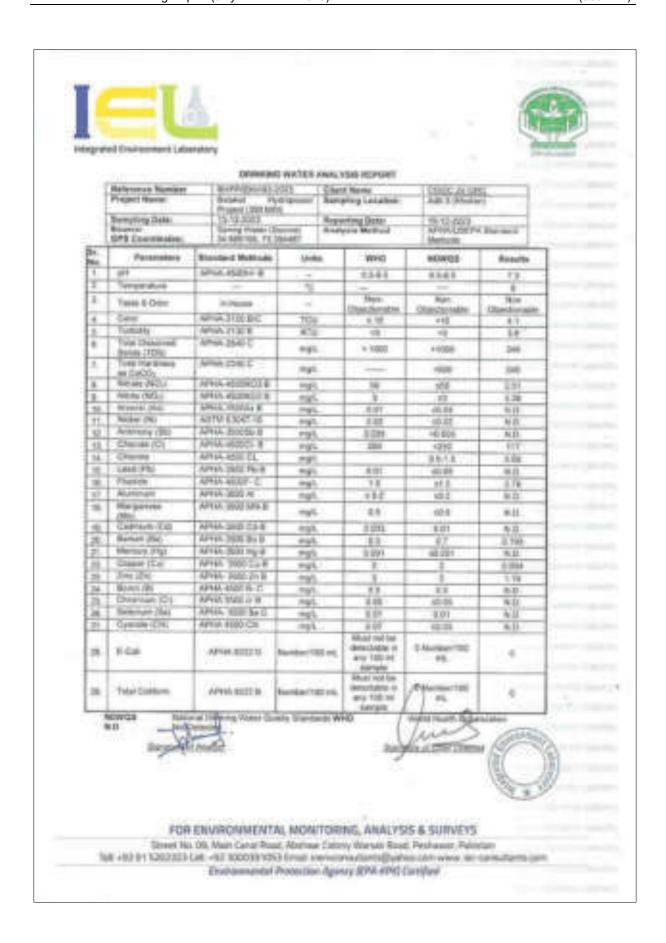




















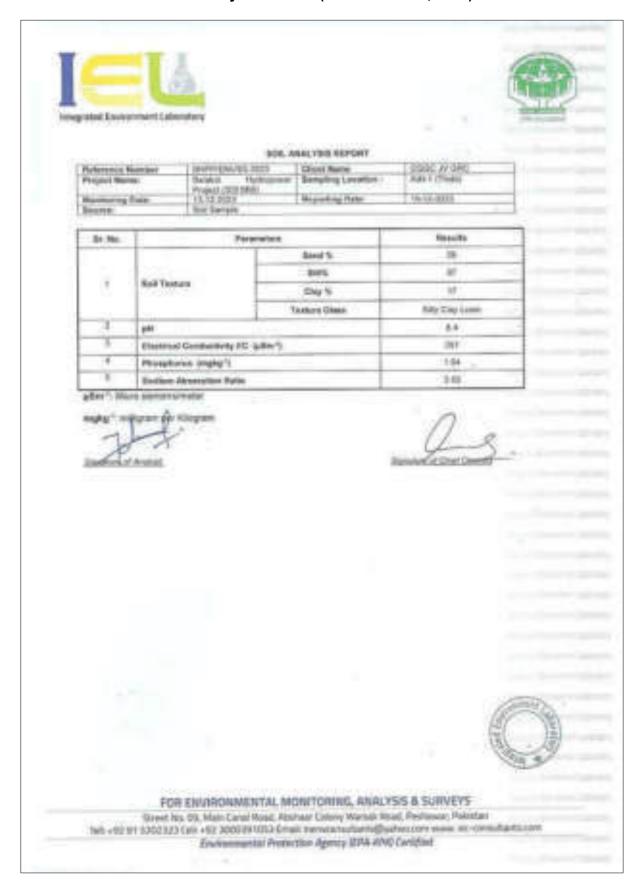
Surface Water Monitoring Results (Fourth Quarter, 2023)



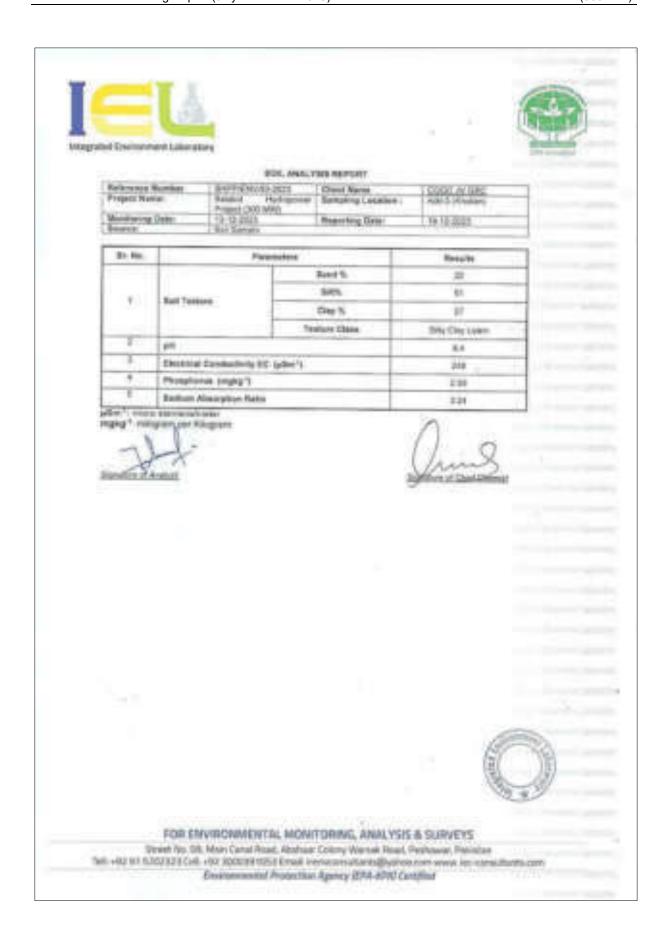




Soil Analysis Results (Fourth Quarter, 2023)











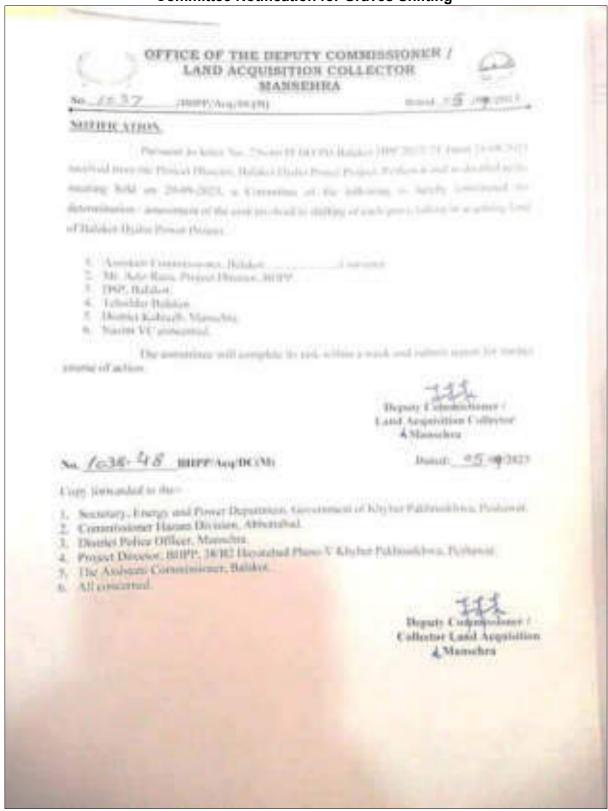


Copy of Solid Waste Disposal NOC from KDA



Annexure-06: Committee Notification for Graves Shifting

Committee Notification for Graves Shifting



Annexure-07: Forest Complaint Settlement

Forest (Water Shed Management) Complaint Settlement

