



April 6, 2021

Ms. Abira Ashfaq; Mr. Khurram Ali;
Ms. Fizza Qureshi; Advocate Khwaja Altaf;
Ms. Laila Raza; Ms. Fatima Zaidi;
Mr. Hafeez Baloch; Mr. Javaid Baig;
Karachi Bachao Tehreek,
Karachi

Dear Mses./Messrs. Ashfaq, Ali, Qureshi, Raza, Zaidi, Baloch, Baig, and Advocate Altaf:

RE: Complaint to the World Bank, the Gujjar Nullah Project

I acknowledge receipt of your letter dated 19 March 2021, related to forced evictions of communities along Gujjar Nullah, Orangi Nullah and other drains in Karachi. I would like to start by clarifying that the anti-encroachment drive taking place in Karachi, along the nullahs or in any other areas of the city, is not in any way related to or financed by any World Bank-supported projects.

Your letter specifically refers to the Solid Waste Emergency and Efficiency Project (SWEEP), which was approved by the World Bank on December 8, 2020 and became effective on March 2, 2021. Key investments under SWEEP are intended to improve solid waste management services in Karachi, including collection, transport, treatment, and disposal of waste.

In view of high flooding risks anticipated before the monsoon season in 2020, SWEEP included potential funding under Component 1 for the Government of Sindh to finance emergency cleaning of solid waste from nullahs in 2020. The scope of eligible activities under this Component 1 was limited to cleaning of solid waste clogging nullahs, transportation of dredged material to a disposal site, development of a disposal facility for the dredged waste, and interventions to reduce public dumping of waste into nullahs. Eligible interventions do not include any removal of encroachments around nullahs.

Emergency nullah cleaning activities to be eligible for potential retroactive financing under Component 1, were to be conducted during the 2020 monsoon season (July-September, 2020) only. No funding is available under SWEEP for nullah cleaning beyond 2020. Accordingly, none of the activities conducted by the Government of Sindh under any of the 2021 anti-encroachment drives in the Gujjar nullah, or any other nullahs in Karachi, have been associated with, financed under, or conducted in anticipation of SWEEP. Further, in accordance with the financing agreement between the World Bank and the Government of Sindh, activities in any area of Karachi that have been impacted by an anti-encroachment drive cannot be supported by the World Bank. Therefore, in view of the recent anti-encroachment drives along various Karachi nullahs, World Bank-supported projects will be prohibited from financing any future investments on the affected nullahs.

As is the case of all World Bank-financed projects, SWEEP was designed and will be implemented in accordance with the principles and requirements of the World Bank's policies on involuntary resettlement. These are articulated in Environmental and Social Standard 5 (ESS5) on "Land Acquisition, Restrictions on Land Use and Involuntary Resettlement" of the Environmental and Social Framework (ESF). The World Bank is committed to these principles in Karachi and globally and any involuntary resettlement under a Bank-financed project must be carried out strictly in accordance with applicable World Bank policy and standards.

Accordingly, in 2020 during the preparation of SWEEP, the Government of Sindh prepared and disclosed environmental and social management instruments in line with the ESF. Key ESF documents that

have been publicly disclosed to date were consulted on during June and July 2020 and include: (a) the environment and social commitment plan (ESCP), (b) a draft stakeholders engagement plan (SEP), (c) a draft environmental and social management framework (ESMF), and (d) a draft resettlement framework (RF). According to the ESCP, current versions of the SEP, ESMF, and RF will be updated and publicly re-disclosed within 60 days of project effectiveness.

As part of updating current ESF instruments, the Government of Sindh will organize further stakeholder consultations, including with project affected communities and persons and vulnerable groups (e.g. women, minorities, informal workers, etc.). Future consultations will cover all stakeholders relevant to the project's scope (i.e. the activities under Component 2 for developing solid waste management infrastructure) and all interventions that are included in the scope to achieve the intended results. The new round of consultations is expected to begin in the coming weeks, as soon as the update of instruments is underway, and the implementing agencies and the World Bank will ensure that information in this regard is available to all stakeholders, including communities. In line with the SEP, the Government and the World Bank will also continue to ensure that meaningful stakeholder consultation, including with communities, takes place throughout the life of the project and informs the design and implementation of the planned solid waste management infrastructure before any of the works commence.

Information regarding consultations will be disseminated widely; materials, in accessible formats, will be made publicly available in advance; consultations will be organized at times and venues that are suitable and acceptable for the groups being consulted; and, separate consultation sessions for women and vulnerable groups will be ensured. Finally, information regarding project activities will be publicly disclosed through appropriate methods and identified channels proposed by stakeholders, including communities. All ESF documents related to the SWEEP, are available at the [Sindh Solid Waste Management Board's \(SSWMB\) website](#), as well as at the Government of Sindh's [Local Government Department's website](#), and at the [SWEEP page](#) on the World Bank's website. Further, a recent [factsheet](#) published by the World Bank on its activities in Karachi may also provide further information relevant to your concerns.

I would like to stress that current anti-encroachment activities, while not linked to any World Bank-financed projects, are a matter of great concern for all. Accordingly, the World Bank is currently in dialogue with the Government of Sindh, the city administration, and the Federal Government to encourage the development of a city-wide framework for resettlement and rehabilitation in Karachi that is in line with international standards.

We value your feedback and welcome opportunities for the World Bank to further an inclusive development agenda for Karachi. Moreover, we are committed to following up with the Government of Sindh on your concerns related to transparency, consultations, and the accessibility of project information. Please feel free to communicate any further queries or concerns to Mr. Suhaib Rasheed, Urban Development Specialist and Team Leader for SWEEP at srasheed@worldbank.org. In addition, project-related matters can also be addressed to the Sindh Solid Waste Management Board's (SSWMB) [grievance redress system](#), or to Mr. Zubair Ahmed Channa, Managing Director, SSWMB/ Project Director, SWEEP, via phone (021-99333701) or email: md@sswmb.gos.pk

Sincerely,



Najy Benhassine
Country Director, Pakistan

Cc:

Mr. Muhammad Waseem, Chairman, Planning and Development Board, Government of Sindh

Mr. Navid Ahmed Shaikh, Commissioner, Karachi Division

Mr. Najam Ahmed Shah, Secretary, Local Government Department, Government of Sindh

Mr. Zubair Ahmed Channa, Managing Director, SSWMB/ Project Director, SWEEP