

Redress



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Independent
Redress
Mechanism

Independent Redress Mechanism

Grievances and Complaints

Eligibility Determination

GCF Project FP085: Green BRT Karachi

IRM Case C-0014 Pakistan

19 April 2025

Eligibility Determination

The Terms of Reference (TOR)¹ and the Procedures and Guidelines (PGs)² of the Independent Redress Mechanism (IRM) sets out how the IRM deals with grievances or complaints from a person, group of persons, or community who have been, or may be affected by the adverse impacts of a GCF funded project or programme. Once a grievance or complaint is received and registered by the IRM, the PGs require the IRM to determine if the grievance or complaint meets the eligibility criteria set out in paragraphs 20 – 21 and 23-24 of the PGs of the IRM. It is to be noted that this determination is procedural, and that it does not represent a judgement on the merits or the substance of the case.

SUMMARY OF ELIGIBILITY DETERMINATION

For reasons substantiated in greater detail in this document, the IRM determines that this grievance/complaint is eligible under the IRM's TOR and PGs.

BACKGROUND

On 18 March 2025, the IRM acknowledged receipt of a new complaint with potential relevance to GCF project FP085. The complainants comprise members of Union Committee 11, a local government body of elected officials, acting in their capacity as representatives and affected community members. The complainants have not requested confidentiality.

The complaint relates to GCF-funded project FP085, "Green BRT Karachi." The project aims to build a zero emissions rapid bus transit system in the city of Karachi.³ Project activities include (i) construction of a bus rapid transport corridor of approximately 30 kilometers; (ii) operationalizing a biomethane hybrid bus fleet; (iii) flood proofing and improving transport corridors and (iv) construction of a biogas plant.

FP085 was approved during the 21st meeting of the GCF Board on 20 October 2018. The Accredited Entity (AE) of this Project is the Asian Development Bank (ADB). At the date of this eligibility determination, the Project is marked as 'Under Implementation' with a disclosed completion date of 25 December 2024.⁴

The complainants have brought to the IRM several concerns related to the implementation of this project. The complainants have alleged the following:

- 1) Disruptions to daily life of residents and business owners due to improper execution of construction works;
- 2) Destruction and/or damage to existing water and sewerage lines, as a result of project activity, leading to interruptions in access to basic utilities;
- 3) Lack of consultation of Union Committee and relevant local authorities in the planning and implementation of project activities; and
- 4) Risks to community health and safety as a result of pollution (sewerage overflows) and restrictions on accessing roads and businesses;

¹ Available at: <https://irm.greenclimate.fund/document/irm-tor>

² Available at: <https://irm.greenclimate.fund/document/2019-procedures-and-guidelines-irm>

³ For more information on the project, please visit: [FP085: Green BRT Karachi | Green Climate Fund](#)

⁴ The IRM notes, per the GCF Secretariat, an extension of the completion date for the project is currently under processing.

During the phase of eligibility determination, the IRM obtained further information from complainants. Information gathered included engagements with complainants, review of relevant project documentation such as the Funding Proposal, Environmental and Social Safeguards report and subsequent Annual Performance Reports. Based on the information gathered, the IRM *prima facie* concludes that the eligibility criteria, as set out in more detail below, have been met.

ELIGIBILITY CRITERIA

The IRM examined the eligibility of the complaint/grievance against the eligibility criteria set out in paragraphs 20 – 21 and 23-24 of the PGs of the IRM. The primary eligibility criteria and the IRM’s findings in relation to these criteria are set out in the table below.

Criterion	Does the grievance or complaint meet the criterion?	Reason(s)
<p>Was the grievance or complaint filed by a person, group of persons, community (or any duly authorised representative of the aforementioned groups) who have been or may be affected by the adverse impacts of a GCF funded project or programme?</p>	<p>Yes</p>	<p>The complainants are a group of persons residing in an area where activities related to FP085 are being implemented. As set out above, <i>prima facie</i>, complainants are experiencing adverse impacts linked to a GCF project or programme.</p>
<p>Was the grievance or complaint submitted to the IRM before whichever is the later of the following two dates:</p> <p>(a) Two years from the date the complainant becomes aware of the adverse impacts referred to in paragraph 20 of the PGs; or</p> <p>(b) two years from the closure of the GCF funded project or programme.</p>	<p>Yes</p>	<p>The complaint was submitted on 18 March 2025. At the time of submission, the project was under implementation. The complaint was accordingly submitted to the IRM before the later of the dates mentioned in paragraph 23 of the IRM’s PGs.</p>

Does the grievance or complaint fall into any one or more of the exclusions listed in paragraph 24 of the PGs?	No	None of the exclusionary criteria appear to be triggered by this complaint.
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ELIGIBILITY DETERMINATION

For the reasons stated above, the IRM determines that this grievance or complaint is **eligible** under the IRM's TOR and PGs. The IRM will now engage with the complainant(s) to understand the issues in the complaint and to provide further information on the next steps available to process the complaint. For further information on the process that the IRM will follow, please refer to paragraph 36 of the PGs.

[Signed]

Paul Goodwin

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