

Redress



GREEN
CLIMATE
FUND

Independent
Redress
Mechanism

Independent Redress Mechanism

Grievances and Complaints

Eligibility Determination

GCF Project SAP039: Integrated climate risk management for strengthened resilience to climate change in Buner and Shangla Districts of Khyber Pakhtunkhwa Province, Pakistan

IRM Case C-0017 Pakistan

18 November 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 not eligible under the IRM's TOR and PGs.

BACKGROUND

On 25 August 2025, the IRM received a complaint pertaining to GCF Project SAP039 “Integrated climate risk management for strengthened resilience to climate change in Buner and Shangla Districts of Khyber Pakhtunkhwa Province, Pakistan.” The complaint highlighted the impacts of severe flooding events experienced by communities residing in the project areas in August 2025, resulting in loss of life, displacement and destruction of livelihoods and property. The complaint alleged adverse impacts of the flooding events were exacerbated by the alleged failure of and delay in delivering climate information services and community readiness as promised under the GCF Project.

SAP039 is intended to enhance flood early warning and anticipatory action through improved dissemination of climate information services and early-warning systems in the Khyber-Pakhtunkhwa province of Pakistan. Project components include the installation of automatic weather stations, automatic river gauges, and automatic water level stations. Project activities further include climate-sensitive anticipatory actions such as better protocols and simulation exercises, enhancing local adaptation plans, supporting livelihood diversification, and improving knowledge management and learning.

SAP039 was approved during the 39th meeting of the GCF Board on 18 July 2024. The Accredited Entity (AE) of this Project is the World Food Programme. The Project is ‘Under Implementation’ with an expected completion date of 24 September 2028.³

The IRM registered the complaint on 4 September 2025. During the phase of eligibility determination, the IRM attempted to reach out to the party or parties who submitted the complaint but was unable to secure a meeting or obtain additional information to assess eligibility of the complaint. On the basis of the above, the IRM *prima facie* concludes that the eligibility criteria, as set out in more detail below, have not been met.

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

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

³ [SAP039: Integrated climate risk management for strengthened resilience to climate change in Buner and Shangla Districts of Khyber Pakhtunkhwa Province, Pakistan | Green Climate Fund](#)

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)
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?	No	The IRM was unable to verify if the complainant(s) belong to or are authorized to represent a group or community who may have been or have been affected by a GCF Project.
Was the grievance or complaint submitted to the IRM before whichever is the later of the following two dates: (a) Two years from the date the complainant becomes aware of the adverse impacts referred to in paragraph 20 of the PGs; or (b) two years from the closure of the GCF funded project or programme.	Yes	The complaint was submitted on 25 August 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.
Does the grievance or complaint fall into any one or more of the exclusions listed in paragraph 24 of the PGs?	N/A	The IRM does not have sufficient information to determine triggering of the exclusion criteria.

ELIGIBILITY DETERMINATION

For the reasons stated above, the IRM determines that this grievance or complaint is **ineligible** under the IRM's TOR and PGs. No further steps will be taken by the IRM regarding this complaint, and this case will now be closed.

[Signed]

Sonja Derkum

Head of Unit,
Independent Redress Mechanism
Green Climate Fund

Prepared by:

Preksha Krishna Kumar
Registrar and Case Specialist
Independent Redress Mechanism
Green Climate Fund