

Redress



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Mechanism

Independent Redress Mechanism

Grievances and Complaints

Eligibility Determination

GCF Project FP085: Green BRT Karachi

IRM Case C-0024-Pakistan

15 September 2026

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 26 August 2026, the IRM registered a complaint, received on 23 August 2026, related to the implementation of GCF Project FP085 in Pakistan. The complainant(s) are members of Union Council-1, TMC Model Colony, Karachi, acting in their capacity as representatives and affected community members. The complainants have not requested confidentiality.

The complaint relates to GCF 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, but the IRM understands that per the Secretariat, an extension to the completion date is pending.

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

- 1) Destruction of water supply, gas and electric infrastructure due to construction works;
- 2) Improper disposal of construction debris, resulting in blockages to sewerage systems; and
- 3) Increased risk of flooding to roads due to construction activity;

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](#)

During the phase of eligibility determination, the IRM obtained further information from complainants. Information gathered included engagements with complainants, the GCF Secretariat and review of relevant project documentation. 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)
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?	Yes	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.
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 23 August 2026. 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?	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]

Sonja Derkum

Head of Unit

Independent Redress Mechanism

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