

# Redress



GREEN  
CLIMATE  
FUND

Independent  
Redress  
Mechanism

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## **Independent Redress Mechanism**

### **Grievances and Complaints Initial Steps Report**

**GCF Project FP085: Green BRT Karachi**

**IRM Case C-0014-Pakistan**

**18 September 2025**



## Initial Steps Report

The Terms of Reference (TOR)<sup>1</sup> and the Procedures and Guidelines (PGs)<sup>2</sup> of the Independent Redress Mechanism (IRM) set 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 has been declared eligible, the IRM, as part of its initial steps, holds discussions with the complainants and potential parties to understand the issues at hand; explains the processes of the IRM; and determines whether the parties wish to proceed with problem solving or compliance review or a combination of both. Under the IRM terminology, this phase is called the “initial steps phase.”

In this phase of the process, the IRM does not gather information to determine faults or make judgments on the merits of the complaint. The objective of this report is to collect parties’ perspectives on the alleged impacts. This report does not intend to substantiate any of the allegations or perspectives.

This report documents the initial steps described above as well as its outcome.

### SUMMARY OF OUTCOMES

On 19 April 2025, the IRM declared eligible a complaint concerning GCF-funded Project FP085 “Green BRT Karachi.”<sup>3</sup> The complaint relates to issues arising from the implementation of project activities related to flood-proofing of roads and improving transport corridors in Karachi, Pakistan.<sup>4</sup> The complainants have not requested confidentiality and comprise members of a local government authority, Union Committee 11, acting in their capacity as representatives of affected community members.

The complaint relates to GCF-funded project FP085, “Green BRT Karachi” which aims to build a zero emissions rapid bus transit system in the city of Karachi. Project activities include (i) construction of a bus rapid transport corridor of approximately 30 kilometres; (ii) operationalising a biomethane hybrid bus fleet; (iii) flood proofing and improving transport corridors and (iv) construction of a biogas plant. FP085 was approved at the 21<sup>st</sup> meeting of the GCF Board on 20 October 2018, and the completion date is listed as 25 December 2024. The IRM understands that an extension of the completion date of the project is under consideration. The Accredited Entity (AE) for this Project is the Asian Development Bank. The Executing Entities (EEs) for this project are the Islamic Republic of Pakistan; Province of Sindh and TransKarachi.

The complaint relates to construction works along the Karachi Bus Rapid Transit Red Line Project along Dadabhoy Nauroji Road in Karachi, Pakistan. The complainants allege several adverse impacts including (i) improper implementation and management of construction works; (ii) damage to public utilities and infrastructure such as water pipelines and sewage systems; (iii) Lack of consultation with relevant local elected

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

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

<sup>3</sup> Available at: [FP085: Green BRT Karachi | Green Climate Fund](#)

<sup>4</sup> <https://irm.greenclimate.fund/sites/default/files/case/redacted-complaint.pdf>

bodies; and (iv) adverse impacts related to safety, accessibility and impacts to businesses as a result of construction works.

Following the IRM's determination of eligibility,<sup>5</sup> the IRM team commenced with engagements with the complainants and other stakeholders in the initial steps phase to better understand the issues in the complaint and to provide further information on the two complaint handling modalities, as indicated in paragraph 36 of the IRM PGs. During the initial steps phase, the IRM does not gather information to determine the merits of the complaint or assess any compliance-related matters. Its objective is limited to better understanding parties' perspectives and determining whether the complaint could be processed through problem-solving.

Further, complainants had approached the Asian Development Bank's Accountability Mechanism and had subsequently submitted their complaint with the Office of the Special Project Facilitator (OSPF).<sup>6</sup> OSPF concluded its eligibility phase on 30 May 2025. The IRM aligned timelines and extended its deadline for concluding initial steps in order to promote collaborative working arrangements with the accountability mechanism of the Accredited Entity. The deadline for the initial steps, originally set for 19 June 2025, was further extended to 31 August 2025.<sup>7</sup> At the conclusion of the Initial Steps Phase, the IRM referred the complaint to problem-solving.

## **CASE-RELATED ENGAGEMENTS**

At the time of submission, the IRM received numerous materials including a complaint letter, audio-visual materials, and supporting documentation pertaining to the real-time adverse impacts experienced by affected community members living in the location of ongoing project implementation. The IRM team was subsequently made aware of proactive measures taken by the Accredited Entity to resolve the immediate concerns raised in the complaint.

In their complaint letter and supplementary documentation, complainants had raised several immediate adverse impacts being experienced that could pose a threat to health, safety and security. Complainants highlighted disruptions caused by the construction of the stormwater drainage system along a significant section of a busy road. In particular, complainants were concerned about the threats posed by unfenced construction areas and open manholes, which could be hazardous to the health and life of community members. Complainants also identified the poor condition of the roads, decreased accessibility and the risk of flooding events as additional threats to residents as well as local businesses, religious institutions, schools and other public institutions. Complainants requested that the IRM raise these concerns with relevant authorities at the earliest and hoped that remedial actions could be undertaken.

The IRM team engaged with the GCF Secretariat in April and May 2025 to explain the initial steps phase of the complaint and hear their views on the issues raised in the complaint. The IRM raised the issues related to community health, safety and security to the GCF Secretariat with the understanding that any immediate risks be identified for

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<sup>5</sup> <https://irm.greenclimate.fund/sites/default/files/case/eligibility-determination-c0014-pakistan.pdf>

<sup>6</sup> <https://www.adb.org/who-we-are/accountability-mechanism/complaint/pakistan-karachi-bus-rapid-transit-red-line-project-4>

<sup>7</sup> [c0014-pakistan-irm-extension-time-decision-initial-steps.pdf](https://irm.greenclimate.fund/sites/default/files/case/extension-time-decision-initial-steps-c0014-pakistan.pdf)

action and remediation. The IRM was informed by the complainants and GCF Secretariat that meetings were held in May 2025 between Executing Entities, complainants and the Accredited Entity to address the immediate risks identified in the complaint. The IRM understands that some corrective measures were agreed to and implemented through the end of May 2025 and further, through the end of August 2025. Complainants expressed serious reservations about the planned construction and operation of the new stormwater drainage system, namely the associated and cumulative impacts to existing sewerage lines that in the view of complainants are in a poor state and require replacement.

In engagements with the IRM team, complainants highlighted their preference for problem-solving to address any outstanding issues raised in the complaint. In order to avoid duplication of efforts, and to better align processes in relation to the common issues raised in the complaint, the IRM team and OSPF team agreed to coordinate subsequent meetings and communications with all relevant stakeholders to the process, with OSPF acting as the lead accountability mechanism in the problem-solving process and the IRM following their lead.

Given the structure of OSPF as a problem-solving mechanism, the IRM is proceeding to the next stage in the complaints-handling process with the understanding that all parties have expressed their willingness to engage in problem-solving. The IRM will re-engage with the GCF Secretariat, ADB and Executing Entities as the case progresses to the problem-solving stage. IRM and OSPF will jointly work to agree on timelines, agendas and roles, with the participation of all relevant stakeholders.

Problem-solving is a flexible and participatory process focused on assisting parties in finding and/or developing an effective solution to the concerns raised by the complainants. A problem-solving process focuses on addressing the concerns that gave rise to the grievance or complaint in a way that meets the interests of the complainants and the other potential parties and is mutually satisfactory. A problem-solving process does not seek to determine culpability or assign blame, nor is it a compliance review. The entire problem-solving process is conducted in confidence to enable the complainants and other parties to engage with each other, build trust, and collectively explore solutions in a safe and protected space. All information used in a problem-solving process by the parties is held in confidence by the dispute resolution team and will not be used in any future IRM processes, including any potential compliance review.

## **NEXT STEPS**

As the parties have agreed to pursue problem-solving as a first attempt to resolve the issues raised in the complaint, the IRM will now collaborate with the parties to ascertain a reasonable timetable and structure for an effective process. The IRM has already been monitoring developments related to the ongoing efforts to resolve the issues raised in the complaint and will identify any further resources that may be necessary for an effective problem-solving process in consultation with parties. In accordance with the Principles for Cooperation among Independent Accountability Mechanisms (IAMs),<sup>8</sup> the IRM will

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<sup>8</sup> Accessible here: <https://thedocs.worldbank.org/en/doc/3043c724b44d475060e19be691c1a0ae-0490092016/original/IAMnet-Criteria-for-Participation-and-Principles-for-Cooperation-september-2016-ENGLISH.pdf>

continue its engagements with OSPF to coordinate the processing of the complaint.

The problem-solving process should ordinarily be completed within one year of the parties' agreement to pursue it unless an absolute need for an extension arises and is agreed upon by the parties and the IRM. Once an agreement is reached, the IRM will inform the GCF Board of the problem-solving outcomes and will monitor the implementation of the agreement.