

Environmental Monitoring Report

PUBLIC

Semestral Report
January-June
2025

July 2025

PAKISTAN: Supporting Public–Private Partnership Investments in Sindh Province

Prepared by PPP Support Facility (PSF) for the Asian Development Bank

NOTES

- (i) The fiscal year (FY) of the Government of the Islamic Republic of Pakistan and its agencies ends on 30 June.
- (ii) In this report “\$” refer to US dollars.

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List of Acronyms

ADB	Asian Development Bank
ADP	Annual Development Program
ECNEC	Executive Committee of the National Economic Council
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPPP	Enhancing Public Private Partnership Investments in Sindh Province
ESMS	Environmental and Social Management System
GoP	Government of Pakistan
GoS	Government of Sindh
GRM	Grievance Redress Mechanism
IEE	Initial Environmental Examination
JICA	Japan International Cooperation Agency
PIAL	Prohibited Activities Investment List
PPP	Public Private Partnership
PSCC	Project Screening & Categorization Committee
PSF	PPP Support Facility
REA	Rapid Environmental Assessment
SEPA	Sindh Environmental Protection Agency
SAEMR	Semi Annual Environmental Monitoring Report
SPS	Safeguard Policy Statement
TA	Technical Assistance
VGF	Viability Gap Fund

1. Introduction

1.1. Preamble

1. This report presents the Semi-annual Environmental Performance of the PPP sub-projects within the Enhancing Public Private Partnership Investments in Sindh Province (EPPP) Project from January to June 2025
2. During this reporting period one social sector project (Regional Blood Center (RBC)– Sukkur and one infrastructure development project Marble City Karachi (MCK) were screened and concurred as environmentally Category B projects by the ADB in compliance with the ADB-SPS 2009. Therefore, as required by Asian Development Bank (ADB), an Environmental Audit Report for RBC Sukkur was developed and cleared while an IEE for MCK was developed and in process of concurrence/clearance from the ADB, to fulfil the environmental safeguards requirements.
3. Moreover, PSF endeavors to comply with the Environmental and Social Management System (ESMS) with respect to safeguards management for Sindh PPP pipeline sub-projects. In this report, all performance assessment aspects have been briefly explained along with their status during the reporting period.

1.2. EPPP Project Background

2. The infrastructure and social service needs of Sindh exceed the provincial public resources available. To address the significant infrastructure requirements in an efficient, cost-effective manner and to enable further private participation in delivering infrastructure services, the Government of Sindh (GoS) requested the assistance of Asian Development Bank (ADB) to expand and improve Public Private Partnership (PPPs) in Sindh province.
3. The specific outputs of the EPPP project are as follows:
 - (i) GoS capacity to select and develop PPP projects strengthened.
 - (ii) PPP project-related fiscal risk effectively managed by the PPP Support Facility (PSF); and
 - (iii) PPP project management capacity of line departments strengthened.
4. The EPPP Project was approved by the Executive Committee of the National Economic Council (ECNEC) of Pakistan on July 10, 2017. The Loan & Project Agreements were signed between the Government of Pakistan (GoP) and ADB on September 12, 2017. There were certain conditions to the effectiveness of the loan which were fulfilled after which it became effective on March 31, 2018.
5. In furtherance of the stated project objectives as mentioned in para 3 above, the implementing / executing agency of the GoS got PSF incorporated under Section 42 of The Companies Act, 2017. The purpose of the PSF is to manage the new Viability Gap Fund (New VGF), thereby enhancing corporate governance,

transparency, and to improve the delivery of public infrastructure and social services by achieving better value and improving risk management of the New VGF.

6. The environmental and social policies of PSF adhere to the requirements of national legal and regulatory, and international ratified conventions and agreements. It has helped establish a good reputation of PSF among donors, civil society, and other national and international stakeholders to ensure its Environmental & Social safeguard practices are in line with international standards and international best practices such as ADB requirements for financial intermediaries. In addition to this, the PSF also complies with environmental and social policies of the respective Financing Source(s).
7. The purpose of PSF's ESMS was to integrate environment safeguards into the overall management system and provide operational guidance to PSF's staff in preparing PPP sub-projects and developing mechanisms for effective monitoring/inspection and compliance.

1.3. Purpose of the Semi-Annual Environmental Monitoring Report (SAEMR)

8. This is a consolidated report on the implementation of environmental safeguards for sub-project activities carried out during the January 2025 - June 2025 reporting period and has been prepared in compliance with the ADB and PSF policies. The benchmark for performance is the ongoing compliance against the applicable environmental safeguard requirements in the cleared projects.

2. Screening and Review Procedures

9. The screening and review procedures for the EPPP are summarized below.

2.1. Review of PPP Projects - Environmental Safeguards

10. **Table 1** lists the projects Concurred by ADB for financing and **Table 2** provides the sub-projects which are in the readiness stage¹ for ADB financing requirements.

Table 1: Cleared Projects under Sindh PPP for ADB Financing

S/No.	Project Name	Project Description	Project Status
1	Education Management Organizations (RFP 1)	Outsourcing of education management and administration to qualified and experienced private sector education management organizations.	ADB Concurred and issued PCSS number
2	Education Management Organizations (RFP 2)		ADB Concurred and issued PCSS number
3	Education Management Organizations (RFP 3)		ADB Concurred and issued PCSS number
4	Education Management Organizations (RFP 4)		ADB Concurred and issued PCSS number
5	Education Management Organizations (RFP 5)		ADB Concurred and issued PCSS number
6	Education Management Organizations (RFP 6)		ADB Concurred and issued PCSS number
7	Education Management Organizations (RFP 7)		ADB Concurred and issued PCSS number
8	Teacher Training Institute (TTI)	Outsourcing the management and operations of 02 TTIs in Sindh	ADB Concurred and issued PCSS number
9	O&M Outsourcing of RBC - Jamshoro	O&M outsourcing of GoS RBCs	ADB Concurred and issued PCSS number
10	O&M Outsourcing of RBC - Sukkur	O&M outsourcing of GoS RBCs	ADB Concurred and issued PCSS number

Table 2: Readiness Stage Projects under Sindh PPP for ADB Financing

S/No.	Project Name	Project Description	Project Status
1	Outsourcing of Safety and Security at JPMC	Safety and Security management of JPMC Hospital	ADB has concurred REA (category C project).
3	O&M Outsourcing of RBCs – Shaheed Benazirabad and Karachi	O&M outsourcing of GoS RBCs	Project Categorization Brief developed by PSF while proposing environmental category B. The same was submitted to ADB for

¹ The subprojects are under evaluation for ADB financing eligibility and ADB has not yet committed funding for these subprojects.

S/No.	Project Name	Project Description	Project Status
			concurrency.
4	Outsourcing of Management and Operations of Girls Elementary Schools (JICA assisted)	O&M outsourcing of JICA assisted schools	Project Categorization Brief under development by PSF.
5	Marble City Karachi	Construction and O&M of Economic Zone	ADB has Concurred MCK as a category B project. IEE of the project is under review.

11. Under the existing PPP framework of Sindh, projects in the PPP pipeline at various phases of the development cycle are reviewed rigorously by PSF with respect to environmental safeguards, as enshrined in ESMS. Checklists such as the Prohibited Activities Investment List (PIAL) and Rapid Environmental Checklist (REA) are used to screen projects and to assign the appropriate environmental safeguard categories.

2.2. Screening and Categorization of Proposals/Projects

12. PSF has adopted the PIAL as a tool for preliminarily screening PPP sub-projects. Once a proposed sub-project has cleared the screening against PIAL, the REA checklist is used to ascertain the potential environmental category of the proposed sub-project. In case the proposed sub-project includes any activities listed in the PIAL, the relevant PPP Node and PPP Unit are informed accordingly that the proposed sub-project is illegible for PSF funding.
13. To date, no PPP sub-project has been declined due to non-compliance with PIAL and all projects in the Sindh PPP pipeline are compliant with PIAL.
14. Subsequent to PIAL screening, the Project Screening and Categorization Committee (PSCC) – an inter-organizational committee comprising of relevant personnel from PPP Node, PPP Unit, and PSF – conducts the project screening and categorization exercise in order to ascertain the potential environmental category of the proposed sub-project, thereby gaining clarity about the type and level of detail required in the sub-project's environmental assessment study. The Environmental categorization framework as per PSF's ESMS is provided as **Table 3**.

Table 3: ESMS Categorization Framework

Category (Risk Rating)	Environmental Safeguards
Category A (with potential significant impacts) (will also require prior review and approval by the respective Financing Source)	Comply with Pakistan national legal requirements, and Financing Source requirements (e.g. ADB SPS) (EIA study to fulfill both national and Financing Source environmental regulatory requirements)

Category (Risk Rating)	Environmental Safeguards
Category B (with less significant impacts)	Comply with Pakistan national legal requirements and Financing Source requirements (e.g. ADB SPS) (IEE study to fulfill both national and Financing Source environmental regulatory requirements)
Category C (with minimal or no impacts)	Environmental Checklist to be completed to fulfill national environmental regulatory requirements & Checklist along with Due Diligence Report to fulfill Financing Source requirements

15. The details of the three types of environmental categorization ensured during the reporting period is given as:

Environment Category 'A': *The PPP projects that may have diverse, irreversible, unprecedented and significantly adverse environmental impacts, which may go beyond the physical boundaries of the PPP project. All projects listed under Schedule II of the Sindh EPA Review of IEE & EIA Regulations, 2014 and those sited within a declared environmentally sensitive area are included in this category. In this case, the PPP project shall be subject to both national environmental regulations along with any specific environmental and social safeguard policies from the Financing Source. The Financing Source (eg. ADB) prior review and approval will be required.*

The Draft EIA report shall be made publicly available (for example at PSF and / or PPP Unit website as well as the Financing Source's website) for a minimum of 120-days prior to the PPP project's approval by the Board of Directors of PSF.

The draft EIA study, once ready, is to be disclosed on the PSF and Financing Source's website to ensure the clock for 120 days' disclosure period starts. Once the private party has been selected, it will update the draft report based on any modifications in design and the updated 'Final' version of the report will be posted on the PSF and Financing Source's websites. As long as the changes made by the private party do not constitute a 'major' change in terms of project design and scope, the 120-day disclosure period will not be restarted.

Environment Category 'B': *The PPP projects that may have potentially adverse but site-specific environmental impacts (less adverse than those of category A). All projects listed under Schedule I of the Sindh EPA Review of IEE/EIA Regulations, 2014 are included in this category. An Initial Environmental Examination (IEE) is required for such PPP projects in accordance with the Sindh EPA Review of IEE and EIA Regulations, 2014 along with any specific environmental and social safeguard requirements of the Financing Source(s) that might apply.*

In the case of Category 'B' projects, only the final version of the IEE report needs to be disclosed on the PSF and Financing Source's websites once the report has been cleared by both SEPA and its NOC has been issued and clearance has been obtained from the Financing Source. There is no requirement for disclosure of the draft report for a certain period as is the case for Category 'A' projects.

Environment Category 'C': *The PPP projects that may have minimal or no adverse environmental impacts and are listed under Schedule III of the Sindh EPA Review of IEE/EIA*

Regulations, 2014 will require the completion of an Environmental Checklist. Such PPP projects may be required to follow the sectoral environmental guidelines issued by the Sindh EPA along with any specific environmental and social safeguard requirements of the Financing Source(s) that might apply.

16. The concurred subprojects for ADB financing (mentioned in **Table 1**) and sub-projects in the Sindh PPP pipeline that are at the readiness stage for ADB financing requirements (mentioned in **Table 2**), have undergone environmental screening and categorization procedures. The environmental category of the aforementioned projects is listed in **Table 4**.

Table 4: Environmental Screening and Categorization of Sindh PPP Sub-projects

Project Name	Environmental Safeguards Category
EMO (RFP 1)	C
EMO (RFP 2)	C
EMO (RFP 3)	C
EMO (RFP 4)	C
EMO (RFP 5)	C
EMO (RFP 6)	C
EMO (RFP 7)	C
Outsourcing of Operations and Management of RBC – Jamshoro	B (Requiring Environmental Audit Report)
Teacher Training Institutes (TTIs)	C
Outsourcing of Safety and Security at JPMC	C
Outsourcing of Operations and Management of RBC - Sukkur	B (Requiring Environmental Audit Report)
Outsourcing of Management and Operations of Girls Elementary Schools (JICA assisted)	C
Marble City Karachi (Concurred by the ADB on dated 26-5-2025)	B
Outsourcing of Operations and Management of RBC – Shaheed Benazirabad and Karachi	B (Requiring Environmental Audit Report)

2.3. Due Diligence and Environmental Assessment

17. EMO RFP 1-7 sub-projects, TTIs and Outsourcing of Safety and Security at JPMC subprojects consist of soft components and are environmentally benign in nature, which is why they have been categorized as ‘C’ for Environment and thus conducting due diligence activities and environmental assessments is not applicable for these sub-projects.
18. Moreover, the Environmental Audit Report, for RBC –Sukkur has been Cleared by ADB, while for RBCs –, Shaheed Benazirabad and Karachi the categorization is underway.
19. With regards to JICA- assisted schools sub-project, it is proposed to classify it as Category C because of its environmentally benign nature.

20. The screening and categorization of Marble City Karachi sub-project has been concurred as Category B for environment and Category C for social safeguards by ADB. The IEE report for the MCK project is currently under review.

2.4. Field Visits

21. Field visits are essential and applicable for the existing portfolio of sub-projects that have been concurred and funded by the ADB. However, the projects listed in **Table 1** are environmentally benign and have therefore been categorized as 'C' for Environment.
22. Moreover, the sub-projects for existing facilities categorized as Environment Category 'B', require the preparation of Environmental Audit Reports in compliance with ADB's safeguard requirements. These reports were developed and cleared based on the findings of the Independent Expert (IE), who conducted regular site inspections and environmental monitoring. The quarterly reports submitted by the IE provided adequate evidence to fulfill the monitoring and reporting obligations for these Category 'B' projects.

2.5. Training and Capacity Building

23. During the screening and categorization process, the relevant PPP Nodes were extensively engaged by the PSF and included in the exercise to provide exposure to the specific environmental safeguard requirements as per SEPA and ADB SPS.
24. As larger and more complex sub-projects in the Sindh PPP pipeline will move toward implementation, training and capacity building of the relevant PPP Nodes will remain an ongoing process throughout the project's life cycle. Moreover, continuous support and guidance will be provided to the PPP Nodes during the implementation and completion phases to further enhance their understanding of safeguards and compliance obligations.
25. PSF will coordinate with PPP Node to conduct training need assessment and deliver customized training sessions on Environmental safeguards.

3. Reporting

26. As stated above, since the sub-projects (EMOs and TTIs) presently being funded through PSF are Category 'C' (refer to Table 1) with no physical works involved, thus reporting in terms of monitoring of environmental parameters, monitoring non-compliances etc. is not applicable.
27. Furthermore, for RBCs environmental Category B was concurred by ADB due to the presence of biohazardous and occupational health & safety risks. Subsequently, all ADB SPS requirements were fulfilled.
28. However, in accordance with the reporting requirements of ESMS, PSF submits semi-annual monitoring report to provide a summary of the project pipeline and compliance landscape in accordance with the national regulations and ADB SPS requirements.

3.1. Environmental Approvals

29. No environmental approval from SEPA was required for the projects presently being

funded through PSF (refer to **Table 1**) due to the nature of the projects and the absence of any physical works. However, the required clearance from ADB was obtained for both Category C and Category C sub-projects.

3.2. Information Disclosure

30. In line with ADB's Public Communications Policy, the PSF is committed to working with the PPP Nodes to ensure that relevant environmental safeguard information is disclosed. Pursuant to the ADB's policy and PSF's ESMS, any applicable E&S documents are to be disclosed on the PSF website. Using the link <http://www.pppsf.org/> all the stakeholders have timely and easy access to environmental safeguards information.

4. Projects' Implementation Status

4.1. Institutional Arrangements for Environmental Safeguards

31. At present, all Category 'A' and 'B' projects are at the processing stage and thus no Contractor and/or Construction Supervision Consultants are engaged. The institutional arrangement in place at present to process the projects in the pipeline from environmental safeguard aspects are as follows:

- **Node:** The focal point from the relevant Node identifies projects and shares it with PSF for review and joint conducting of project screening and categorization as per SEPA and ADB policy/ criteria with support from the ADB TA Consultant.
- **PSF Environment Focal Point:** Responsible for overseeing and managing all environmental safeguard related issues, including managing and tasking the ADB TA Consultant, and project consultants and managing the relationship with ADB for efficient and timely processing of the projects in the pipeline.
- **ADB:** The ADB Environment safeguards focal point is responsible for providing guidance on ADB SPS requirements, reviewing all reports being prepared and providing comments and issuing clearance for projects to proceed to the implementation phase.
- **Project Consultant / Transaction Advisor:** The Consultant(s) / Transaction Advisors engaged by Line Agency are responsible for preparing the projects' feasibility which includes environmental and social assessments and / or studies for the respective sub-projects and ensuring all comments and feedback from PSF and ADB are addressed and incorporated in the project documents such as RFQ, RFP, draft Concession Agreement, draft IEEs, draft EIA, E&S scoping studies.
- **ADB TA Consultant:** This Consultant provides support, as requested by PSF, to provide inputs in conducting/vetting screening and categorization of projects, conducting reviews of reports and following up with relevant focal points, as required, to ensure timely processing of the projects in the pipeline. However, it may be noted that the ADB TA Consultants (both for environmental and social safeguards) have been discontinued since January 2023 due to the expiry of TA component.

4.2. Status of ADB Funded Projects

32. The matrix provided below (**Table 5**) presents the status of the projects presently being funded by the ADB through PSF with their respective environmental categories and required safeguards documents that have been prepared to comply with the ESMS of PSF.

33. Considering the limited scope and scale of projects listed in **Table 5**, no

significant environmental impacts were observed, as most of these projects are environmentally benign in nature. In the case of RBCs, the Environmental Audit Reports, prepared as required by ADB, were reviewed and cleared to identify and address potential risks pertaining to environment and/or biohazardous wastes, occupational and community health & safety.

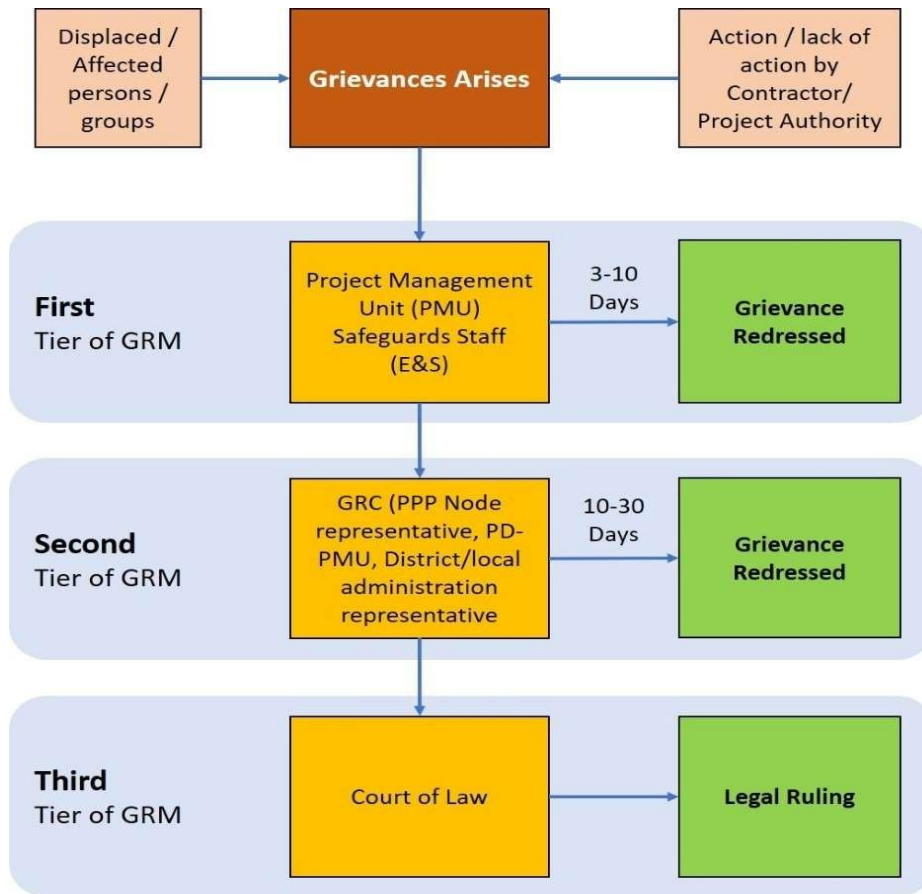
Table 5: Projects under Implementation

Project Name	Project Description	Environmental Categorization	Environmental Safeguard Document Prepared
Education Management Organizations (RFP 1)	Outsourcing of education management and administration to qualified and experienced private sector education management organizations.	Category "C"	REA Checklist and Screening and Categorization Document
Education Management Organizations (RFP 2)			
Education Management Organizations (RFP 3)			
Education Management Organizations (RFP 4)			
Education Management Organizations (RFP 5)			
Education Management Organizations (RFP 6)			
Education Management Organizations (RFP 7)			
Teacher Training Institutes (TTIs)			
Regional Blood Centers (RBCs) Jamshoro and Sukkur	Outsourcing of management and operations of RBCs Jamshoro and Sukkur	Category "B"	REA Checklist & Categorization Document and Environmental Audit Report

5. Grievance Redress Mechanism

34. The PSF endeavors to facilitate the resolution of sub-project affected peoples' concerns, complaints and grievances in relation to the EMP/SMP (where applicable) compliance at the Node based GRM, and to pursue respective PPP Nodes for publication of GRM through its website and/or other channels. It will be required by each PPP Node to establish project-based GRM for speedy and amicable resolution of community concerns and grievances about environmental and social management (i.e. Land Acquisition and Resettlement) issues.
35. The PSF also seeks to ensure that all project agreements for PPP sub-projects contain provisions enabling: (a) Representatives of the Financing Source to inspect the PPP projects and any relevant records and documents; and (b) The Financing Source, in case of any breach in any PPP project being financed by them to require the Concessionaire to bring the PPP projects into compliance with all applicable laws and regulations of Sindh/Pakistan and the laws applicable to the Financing Source.
36. Regarding EMO projects, PSF diligently worked and put its efforts to ensure the PPP Node establishes the Three-Tier GRM which subsequently got established and functional at the PPP Node through notification dated January 09, 2025 (notification attached as Annex-1).
37. Similarly, for the other project that has been cleared during the period Jan-Jun 2025, it was identified during the development of environmental audit report that the RBCs Jamshoro and Sukkur projects have their effective GRM already in place, which is functional and effective to redress the concerns, complaints and issues (if any) of the community/stakeholder in an efficient and timely manner.
38. The management of RBCs has maintained in-house, and blood-camp based registers for receiving the complaints. Subsequently, the record of such complaints/feedback (both verbal and written) is maintained by the management. In addition, RBCs have their dedicated website where all stakeholders can reach out and share their feedback/complaints through their email and by phone.
39. Following the establishment of the GRM, the PPP Node is able to receive, review and resolve grievances from any project-affected persons, including those who are physically and economically displaced, if any. This supports the efficient and effective implementation of the ESMS by the PPP Nodes.
40. The GRM framework within PPP Nodes consists of a three-tiered structure: the first level being at the PPP project site level, the second being at the Node level, while the third being legal recourse, as shown in Figure 1 below.

Figure 1: GRM System



6. Way Forward

41. The following future steps are planned for ensuring compliance with environmental safeguards upcoming projects:
- Capacity enhancement activities on environmental safeguards will be planned and conducted for the respective Nodes.
 - Efforts will be made to ensure that high-quality environmental instruments and/or applicable studies are developed and implemented in both letter and spirit, with the aim of minimizing or preventing potential environmental impacts.
 - PSF will endeavor to ensure that budgetary provisions are included in respective EMPs and environmental studies for compliance of required measures /interventions fulfilling SEPA and ADB SPS requirements. Furthermore, it will be also endeavored to ensure that the EMPs budget provisions are also reflected in the Contractor BOQs.
 - Environmental clearances / approvals will be obtained for the projects in the pipeline from SEPA through the PPP node and ADB through the PSF, prior to the commencement of civil works.
 - It will be ensured that the EIA and IEE studies submitted to SEPA (for NOC clearance) and to ADB (for disclosure and funding approval) are identical. Any subsequent updates to these documents will be reflected consistently and communicated to both SEPA and ADB.



**GOVERNMENT OF SINDH
SCHOOL EDUCATION & LITERACY DEPARTMENT**

Karachi dated 9th January 2025

NOTIFICATION

NO.SO(G-III)SELD/PPP-Node/GRM/2024: The Government of Sindh is pleased to constitute a Grievance Redressal Mechanism Committee for Education Management Organizations (EMOs) Schools, JICA-Assisted Girls' Elementary public sector schools, Teachers Training Institutes (TTIs) under Public Private Partnership mode to address any complaints or grievances arising during the implementation period of the projects undertaken by PPP Node.

PPP Node GRM is established for the speedy and amicable resolution of community concerns and grievances about issues especially related to environment and / or social safeguards.

The composition of the GRM Committee

1	Senior Director, PPP Node, SE&LD	Chairperson
2	District Education Officer of the concerned District	Member
3	Director Admin & HR, PPP Node, SE&LD	Member/ Secretary
4	Private Operator's Project Manager of the concerned Project	Member
5	Principal / HM of the concerned School	Member
6	Chairperson of School Management Committee (SMC) of schools under the concerned project	Member

Terms of reference:

- The GRC is to provide a mechanism for mediating grievances and cutting down on lengthy litigation. It will be a public forum for raising concerns and invoking conflict resolution system available within the project for addressing social or environmental grievances adequately. The GRC will continue to function, for the benefit of the grieved persons till completion of the project.
- The GRC will meet at least once a month. The GRC will review grievances involving all grievances. GRC will perform the following functions:
 - Record grievances of grieved person; categorize and acknowledge about receipt of grievances; investigate the issue and summon aggrieved persons / parties to produce the evidence and explain their claims; and resolve the grievances within stipulated time frame preferably in 30 days;
 - Communicate its decisions and recommendations on all resolved disputes to project executors and the aggrieved persons for implementation and follow the implementation progress;
 - Maintain a complaint register accessible to the all stakeholders with brief information about complaints and GRC decision with status report; and
 - Maintain complete record of all complaints received by the GRC with actions taken.
- The quorum of the finalized GRC will have mandate to conduct the meeting and take decisions accordingly.

NO.SO(G-III)SELD/PPP-Nod

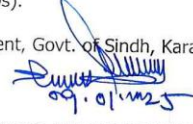


ZAHID ALI ABBASI
SECRETARY TO GOVT. OF SINDH

Karachi dated 9th January 2025
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A copy is forwarded for information and necessary action to:-

1. The Director Schools School Education & Literacy Department, Govt. of Sindh.
2. The Senior Director, PPP (Node), SE&LD, Govt. of Sindh, Karachi.
3. The District Education Officers (Primary/ES&HS) Govt. of Sindh.
4. The Concerned Education Management Organizations (EMOs).
5. The All Member of GRM Committee.
6. The P.S to Secretary, School Education & Literacy Department, Govt. of Sindh, Karachi.
7. The Office Order file.
8. The Official Website.



(TARIQ AHMED JUNEJO)
SECTION OFFICER (G-III)

