Environmental Monitoring Report

PUBLIC

Semestral Report
July – December
2024

April 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. In this report, we present the Semi-annual Environmental Performance of the PPP sub- projects within the Enhancing Public Private Partnership Investments in Sindh Province (EPPP) Project from July to December 2024. During this reporting period, since most of the sub-projects approved are Category ‘C’ projects for Environment, which consisted of entirely benign environmental components, no environmental monitoring was necessary. One social sector project (Regional Blood Center (RBC)– Jamshoro) was screened and concurred as environmentally Category B project. Therefore, as required by Asian Development Bank (ADB), an Environmental Audit Report was developed to fulfil the environmental safeguards requirements and prerequisite of approval for funding. PSF Board has approved West Karachi Recycled Water Project (TP-1) however, the project structure has been revised which needs to be approved by the PPP Policy Board. 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 –July - December 2024 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 approved 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 approved by ADB for financing and **Table 2** provides the sub- projects which are in the readiness stage[1] for ADB financing requirements.

Table 1: Approved 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 Approved; PCSS number issued
2	Education Management Organizations (RFP 2)		ADB Approved; PCSS number issued
3	Education Management Organizations (RFP 3)		ADB Approved; PCSS number issued
4	Education Management Organizations (RFP 4)		ADB Approved; PCSS number issued
5	Education Management Organizations (RFP 5)		ADB Approved; PCSS number issued
6	Education Management Organizations (RFP 6)		ADB Approved; PCSS number issued
7	Education Management Organizations (RFP 7)		ADB Approved; PCSS number issued
8	Teacher Training Institute (TTI)	Outsourcing the management and operations of 02 TTIs in Sindh	ADB Approved; PCSS number issued
9	Operations and Management Outsourcing of RBC - Jamshoro	O&M outsourcing of GoS RBCs	ADB Approved; PCSS number issued

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 approved REA (category C project).
2	West Karachi Recycled Water Project (TP-1)	Wastewater treatment and recycling	ADB has approved REA (category B project).
3	Operations and Management Outsourcing of RBC - Sukkur	O&M outsourcing of GoS RBCs	Project Categorization Brief developed by PSF while proposing environmental category B.

[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
			The same was endorsed and concurred by ADB. As required by ADB, an Environmental Audit Report is being developed to submit for approval
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	Special Economic Zones operations and management	Project Categorization Brief under development by PSF.

11. Under the existing PPP framework of Sindh, projects in the PPP pipeline that are 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 respective environmental safeguard categories.

2.2. Screening and Categorization of Proposals/Projects

12. PSF has adopted the PIAL as a tool to preliminarily screen a PPP sub-project. 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 falls in any of the activities mentioned in the PIAL, the relevant PPP Node and PPP Unit are informed accordingly that the proposed sub-project cannot be funded by the PSF.

13. To date, no PPP sub-project has been declined due to 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 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 approved 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
West Karachi Recycled Water Project (TP-1)	B
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	A

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. Environmental assessment of the subproject TP-1 with Category B is required. However, further updates in this regard are unclear at this point & time and haven't been furthered during the reporting period i.e. July – December 2024.

19. Moreover, the two sub projects of RBCs i.e. Jamshoro and Sukkur required Environmental Audit Report, as concurred by ADB. Such report for RBC – Jamshoro has been prepared, submitted and approved by ADB, while for RBC – Sukkur, the audit report is underway for meeting national regulatory and ADB financing requirements and are expected to be completed by the next reporting period.

20. With regards to JICA- assisted schools sub-project, it is expected to be categorized as Category C because of its environmentally benign nature.

21. The screening and categorization of Marble City Karachi sub-project has been shared with ADB and Category A (for environment) and Category C (for social) have been concurred. The consultants TORs have been reviewed by PSF, PPP Unit and ADB and the same has been shared with the line agency (i.e. SEZMC). It is expected that the environmental assessment instruments will get completed by the next reporting period.

2.4. Field Visits

22. No field visits are required and/or applicable to the existing portfolio of sub-projects that have been approved and funded by the ADB (i.e., ADB financing approved projects in **Table 1**) since they are environmentally benign and due to this reason have been categorized as 'C' for the Environment. Moreover, for RBC – Jamshoro subproject, as environmentally Category B, the Environmental Audit Report has been prepared and approved based on the quarterly reports of Independent Expert (IE). The IE reports are developed based on physical inspection and monitoring by the IE, hence it suffices the purpose.

2.5. Training and Capacity Building

23. During the screening and categorization process, the relevant PPP Nodes have been extensively engaged by the PSF and have been made part of this exercise to provide them exposure on 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 be subsequently implemented, the 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 so that their understanding on safeguard requirements and compliance can be further enhanced and

improved.

25. PSF will discuss the conducting of customized trainings on Environmental safeguards with the different PPP Nodes and based on their level of interest, the conducting of a capacity needs assessment will be considered to further assess the need to conduct the capacity development of Nodes through trainings.

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 RBC – Jamshoro, environmental Category B was concurred by ADB due to the presence of biohazardous and occupational health & safety risks. Therefore, as per requirement and the same were also discussed above, and Environmental Audit Report was developed, submitted to ADB and got approved.

28. However, in accordance with the reporting requirements as per the ESMS, the PSF submits semi-annual monitoring reports to provide a summary of the project pipeline and compliance landscape in accordance with national SEPA regulations and ADB SPS requirements.

3.1. Environmental Approvals

29. No environmental approval was required from SEPA for the projects presently being funded through PSF (refer to **Table 1**) due to the nature of the projects and lack of any physical works involved in them. The clearance from ADB safeguards focal points was obtained for these projects which were all categorized as ‘C’ and ‘B’ (in case of RBCs) as per ADB SPS, 2009.

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 information of environmental safeguards is disclosed. Pursuant to the ADB’s policy and PSF’s ESMS, any applicable E&S document is to be disclosed on the PSF website. Using the link http://www.pppsf.org/ all the stakeholders have timely and easy access to the information on environmental safeguards.

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 points 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 as mentioned in **Table 5**,

environmental impacts were not observed since most of these projects are environmentally benign in nature. While in case of RBC Jamshoro, the Environmental Audit Report (as required by ADB) was prepared and got approved to map and address the 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 Center (RBC) Jamshoro	Outsourcing of management and operations of RBC Jamshoro	Category "B"	REA Checklist & Categorization Document and Environmental Audit Report

5. Grievance Redress Mechanism

34. The PSF endeavor 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 endeavor to ensure that all project agreements for PPP 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, insights from the PPP Node (SELD) revealed that there is already a system in place for EMO projects at both district and project site (school) level. This system includes a District Support Team at the district level, and School Management Committees at the school level. However, it has been assessed that the existing system is not consistent with the proposed three-tier GRM structure and mechanism as per the ESMS.

37. To bridge the gap between the existing EMO system and the proposed GRM, PSF diligently worked and put its efforts to ensure the PPP Node establishes the Three-Tier GRM. This was followed by formal letters (copies attached in Annex-I) to PPP Node for the establishment of such GRM and Grievance Redress Committee (GRC) through notification and subsequent disclosure.

38. It is expected that the GRM would be established and functional by the next reporting period, as the follow-up with PPP Node indicates that the letter for notifying the GRM/GRC has already forwarded and reached the signing authority for signatures[2]..

39. Similarly, for the other project that has been approved during the period July-December 2024, it was identified during the development of environmental audit report that the RBC Jamshoro project has an 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.

40. The management of RBC Jamshoro has maintained in-house and blood-camp

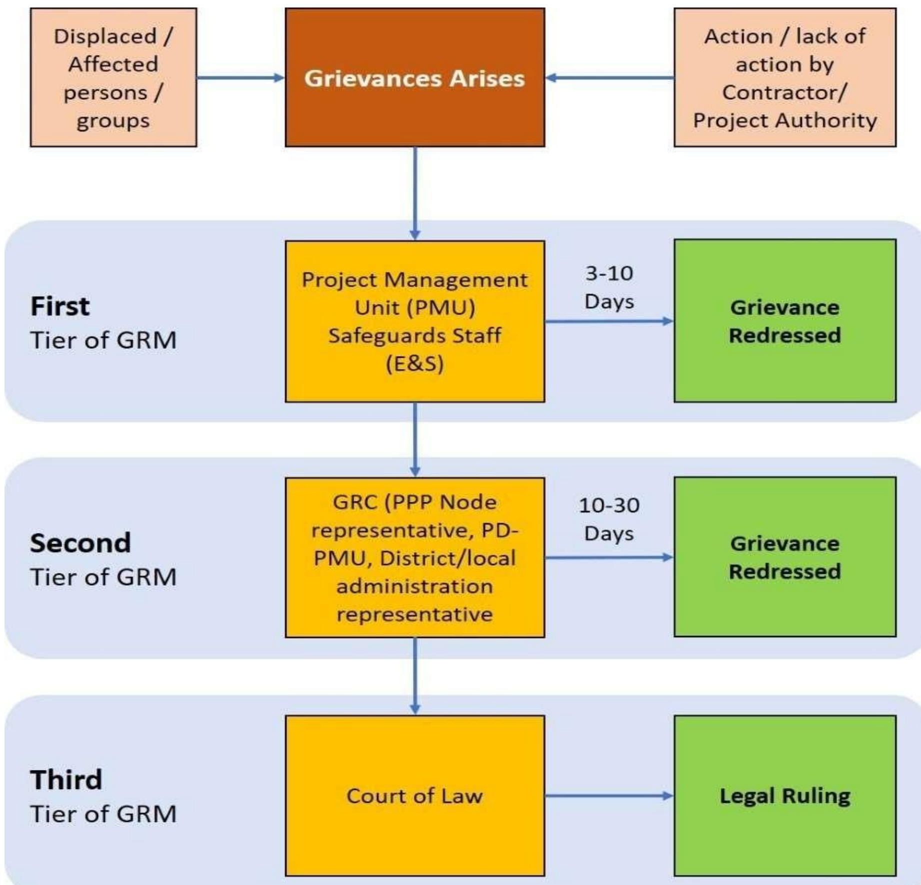
[2] *During the finalization process of this report, PSF was informed that establishment of GRM/GRC has been issued vide SELD Notification No. SO(G-III) SELD/PPP-Node/GRM/2024 dated 9th January 2025. Hence, the compliance of the establishing the GRM/GRC of the project will be reported in following bi-annual report January-June 2025.*

based registers for receiving the complaints. Subsequently, the record of such complaints/feedback (both verbal and written) is maintained by the management. In addition, RBC Jamshoro has its dedicated website[3] where all stakeholders can reach out and share their feedback/complaints through their email and by phone.

41. By establishing the GRM, the PPP Node will be able to receive, review and resolve grievances from any project-affected persons, including those who are physically and economically displaced, if any. This will facilitate the efficient and effective implementation of the ESMS by the PPP Nodes.

42. The GRM framework within PPP Nodes will consist 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



[3] www.rbcjamshoro.gov.pk

6. Way Forward

43. The following future steps are planned for ensuring environmental safeguards compliance for the upcoming pipeline of Category ‘A’ and ‘B’ projects:
    - Capacity enhancement activities on environmental safeguards for the respective Nodes will be planned and conducted.
    - All efforts will be made to ensure high quality EIA, IEE and/or applicable studies are developed and implemented in true letter and spirit to minimize and/or prevent any potential impacts resulting from the project works.
    - Budgetary provisions will be ensured in respective EMPs of IEE and EIA studies to ensure compliance of required measures/interventions stated in EMPs to fulfill SEPA and ADB SPS requirements. Furthermore, it will be ensured that the EMP budget provisions are also added into the Contractor BOQs.
    - Environmental clearances / approvals will be obtained for the projects in the pipeline from SEPA and ADB prior to 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 will be the same versions, and that any updates to the aforementioned documents will be reflected and communicated to both SEPA and ADB.

Annex-I

PSF

for sustainable development

Public Private Partnership Support Facility

PSF/PPP-N /EMO/E.D. Notification/11-01/2024
Karachi the Dated: 25th November 2024

To,
The Senior Director (PPP-Node),
School Education and Literacy Department,
Government of Sindh,
Karachi

Subject: **Establishment of Grievance Redress Mechanism (GRM) and Notification of Grievance Redress Committee (GRC) at SELD for EMOs**

Dear Sir,

1. Hope this letter finds you well. As you know that Government of Sindh has signed a financing agreement with Asian Development Bank (ADB) to promote public private partnership projects in Sindh through 'Enhancing Public Private Partnership (EPPP)' project. We would also like to apprise that the said project requires compliance of standard Environmental and Social Management System (ESMS) along with ADB's Safeguard Policy Statement (SPS) 2009 for all PPP projects.

2. As per compliance requirement of the safeguard documents stated at Para-1/n above, all PPP-Nodes will establish a three-tiers Grievance Redress Mechanism (GRM) at the Node level for all PPP projects involving ADB's financing. Such GRM will be the focal point for any grieved person/party to launch complaint or grievance regarding the matters of their concerns, in general, and Environment & Social matters, in specific, in all PPP projects, for example PPP-EMO school project in this case.

3. Hence, a subsequent Grievance Redress Committee (GRC) is required to be notified to strengthen the GRM as the core element of ESMS of the PPP projects. Three tiers of the GRM will comprise: the project level (PMU/PIU); the GRC; and the court of law.

4. PSF has drafted a concept paper (copy attached) encompassing the structure and functioning of GRM along with the proposed composition of GRC and its Terms of Reference (ToRs).

5. Accordingly, we would request you to please review the attached concept paper and once agreed, make necessary steps to get the establishment of an effective GRM notified for PPP-EMO project at SELD. Please note that we have drafted the concept paper as per the requirements of ESMS document and ADB's safeguard requirements. You may feel free to suggest amendment in the same and to discuss/intimate us in prior to formal notification.

6. We greatly value your continued attention to these matters and appreciate your proactive steps in this regard. Should you require any additional information or clarification, please feel free to reach out.

Thank you for your ongoing support.

Chief Executive Officer
PPP Support Facility

c.c.

1. The Secretary School Education and Literacy Department, Government of Sindh, Karachi
2. Director General PPP Unit, Finance Department, Government of Sindh, Karachi

2nd Floor, Imperial Court Building (Old Block) | Dr. Ziauddin Ahmed Road | Karachi, Pakistan.
Tel: (021) 3564 0337 - 8

PSF/PPP-N/EMO//E. D Notification/11-01/2024
Karachi the dated: 18th December 2024

To,

The Senior Director- PPP Node,
School Education and Literacy Department,
Government of Sindh,
Karachi

Reminder

Subject: **Establishment of Grievance Redress Mechanism (GRM) and Notification of Grievance Redress Committee (GRC) at SELD for EMOs**

Dear Sir,

In continuation of this company's letter **even number** dated **25th November 2024** on the subject cited above, I would like to draw your attention to the matter at hand. The establishment of the Grievance Redress Mechanism (GRM) and notification of the Grievance Redress Committee (GRC) are essential regulatory requirements to fulfil the funding obligations under the *Enhancing Public-Private Partnership (EPPP)* project, supported jointly by the Asian Development Bank (ADB), the Foreign, Commonwealth & Development Office (FCDO), and the Government of Sindh.

It is reiterated that this activity is time-sensitive, and as per the Government of Sindh's commitment to ADB, the GRM and GRC must be notified before **31st December 2024**. Given the approaching deadline, it is anticipated that the PPP-Node of SELD will ensure timely completion of this activity.

Your cooperation and prompt action will help avoid any potential inconvenience or reputational concerns for the Government of Sindh in this regard.

We look forward to your confirmation and successful implementation of the required measures.

Best regards,

Faisal Muqeet
Chief Executive Officer- PSF

C.C.

1. Director General PPP-Unit Finance Department, Government of Sindh, Karachi
2. P.S. to Secretary School Education & Literacy Department, Government of Sindh, Karachi