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A Community-Centric Model Grievance Redressal Mechanism (GRM) for Tharparkar Coalfields



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List of Abbreviations and Acronyms

ADB	Asian Development Bank
BRI	Belt and Road Initiative
CPEC	China–Pakistan Economic Corridor
CSR	Corporate Social Responsibility
EIA	Environmental Impact Assessment
EITI	Extractive Industries Transparency Initiative
EPA	Environmental Protection Agency
ESG	Environmental, Social, and Governance
ESF	Environmental and Social Framework (World Bank)
ESS	Environmental and Social Standard (World Bank)
FCN	Free, Prior, and Informed Consent
FI	Financial Institution
FGD	Focus Group Discussion
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
ILO	International Labour Organization
KPI	Key Performance Indicator
LAS	Legal Aid Support
MoCC	Ministry of Climate Change
MoEFCC	Ministry of Environment, Forest and Climate Change
NEPRA	National Electric Power Regulatory Authority (Pakistan)
NGO	Non–Governmental Organization
OECD	Organisation for Economic Co–operation and Development
PPP	Public–Private Partnership
SDG	Sustainable Development Goal
SECMC	Sindh Engro Coal Mining Company
SEPA	Sindh Environmental Protection Agency

SOP	Standard Operating Procedure
UNDP	United Nations Development Programme
UNGPs	United Nations Guiding Principles on Business and Human Rights
VO	Village Organization
VVO	Volunteer Village Organization
WB	World Bank
WMO	Wafaqi Mohtasib (Federal Ombudsman of Pakistan)

Executive Summary

Tharparkar, located in the southeastern desert region of Sindh, Pakistan, has emerged as the epicenter of coal-based energy development under the China-Pakistan Economic Corridor (CPEC). Since the discovery of over 175 billion tons of lignite coal in the early 1990s, large-scale coal mining and coal-fired power generation have rapidly transformed the region's landscape. Projects such as those in Block I (led by Shanghai Electric and Sino Sindh Resource Limited) and Block II (managed by Engro Energy and ThalNova) have become central to Pakistan's national energy strategy. However, this expansion has brought with it a parallel crisis: the systematic absence or dysfunction of Grievance Redress Mechanisms (GRMs) for the affected communities.

Field investigations and document reviews reveal that GRMs in Tharparkar are either entirely missing (as in Block I) or operate in a limited, opaque, and non-inclusive manner (as seen in Block II). These mechanisms, when they exist, often exclude women, youth, and marginalized groups, lack visibility and accountability, and fail to resolve complaints related to land acquisition, environmental degradation, and socio-economic displacement. Communities have expressed deep mistrust in existing redressal platforms, citing a lack of communication, transparency, and follow-through.

To address these gaps, this study presents a proposed GRM model developed through in-depth Focus Group Discussions (FGDs) and Key Informant Interviews (KIIs) with affected communities in Khario Ghulam Shah and Thario Halepoto villages located in Tharparkar District of Sindh, Pakistan. Drawing from these grassroots insights, the report proposes a community-centric GRM that is locally anchored, multilingual, gender and youth-inclusive, and digitally accessible. The model is grounded in the real needs and expectations voiced by Thari communities and structured to ensure accessibility, procedural fairness, and enforceable accountability.

The model is built upon four core principles: accessibility, transparency, responsiveness, and enforceability. It integrates with formal institutional frameworks, drawing from global grievance redress best practices such as those outlined by the International Finance Corporation (IFC), and BRI environmental standards. Community-based oversight is institutionalized through the inclusion of Village Volunteer Organizations (VVOs), who work alongside company representatives and government authorities in tripartite GRM committees. These committees oversee the intake, investigation, resolution, and dissemination of complaints within clearly defined timelines.

Where grievances are not resolved within 60 days, the model includes a structured escalation pathway to relevant financial institutions and regulatory bodies, such as Chinese development banks, Pakistani regulators, or international lenders, ensuring that redress does not stagnate at the local level. Regular audits, public dashboards, and community reporting loops further strengthen accountability. This proposed GRM model is aligned with both Chinese and international standards under the BRI and CPEC guidelines. By embedding local legitimacy with global oversight, the model seeks to enhance accountability, reduce the risk of social conflict, and support a socially just and inclusive energy transition in Pakistan.

Introduction

1.1. Understanding Grievance Redressal Mechanisms (GRMs)

Grievance Redressal Mechanisms (GRMs) are formal systems that allow individuals or communities affected by development projects to raise concerns, seek remedy, and ensure accountability. These mechanisms serve as crucial tools for conflict prevention and for building community trust, particularly in high-impact sectors like energy and extractives. Without credible GRMs, unresolved grievances can escalate into disputes, undermine social cohesion, and delay project implementation.

According to the World Bank's Environmental and Social Framework (2017), GRMs are mandatory under Environmental and Social Standard 10 (ESS10), which emphasizes meaningful stakeholder engagement throughout a project's lifecycle.¹ The United Nations Development Programme (UNDP) stresses on the importance of timely, transparent, culturally sensitive, and confidential processes to address community complaints.²

In this context, GRMs play a dual role: it protects project-affected communities, and helps project authorities identify, manage, and mitigate risks before they escalate. In large-scale energy projects involving land acquisition, displacement, or pollution that undermines natural resources and livelihoods, grievance mechanisms become essential for safeguarding human rights, securing a social license to operate, and ensuring fair and equitable benefit sharing.

1.2. Theoretical and Legal Foundations of GRMs

Grievance redress procedures are not meant to take the place of established legal avenues for wrongdoer prosecution. Good grievance and redress procedures supplement pertinent national legal and administrative procedures by acting as a "first line" of response to stakeholder issues. A grievance resolution mechanism's ability to operate effectively may depend on its seamless integration into the national judicial system and its explicit referral policies.³

GRMs are not just administrative tools; they are grounded in principles of social justice and accountability. The UNDP defines a GRM as a structured process through which stakeholders can raise concerns about adverse impacts on their daily livelihood and seek resolution in a timely and impartial manner. These systems may include complaints desks, mediation forums, community liaison offices, and third-party review boards.⁴ The theoretical underpinning of GRMs lies in procedural justice theory, which emphasizes fairness in decision-making processes, and deliberative democracy, which stresses inclusive participation and accountability.⁵ In practice, it is a formalized process through which the institution deals with a grievance or complaint. It includes the procedures and systems for receiving complaints of any sort and facilitating their resolution. Resolutions may include steps to enable complainants to seek remedy while safeguarding their human rights.⁶

Effective grievance systems are guided by core principles: accessibility, predictability, equity, transparency, cultural appropriateness, and rights-compatibility, as outlined in the UN Guiding Principles on Business and Human Rights (2011).⁷

1 <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>

2 https://www.undp.org/sites/g/files/zskgke326/files/2024-12/grm.disclosure_projectstakeholdermechanism_1.docx

3 chrome-extension://efaidnbmninnibpcjpcglclefindmkaj/https://climateactiontransparency.org/wp-content/uploads/2020/10/Stakeholder-Participation-Guide_ch9.pdf

4 <https://documents1.worldbank.org/curated/en/701141468175762553/pdf/626260WP0Addre00Box0361488B0PUBLIC0.pdf>

5 <https://www.undp.org/accountability/audit/social-and-environmental-compliance-review-and-stakeholder-response-mechanism>

6 <https://www.unepfi.org/humanrightstoolkit/grievance-mechanisms/#:~:text=An%20effective%20grievance%20mechanism%20can,in%20'Taking%20Action'>

7 https://www.ohchr.org/sites/default/files/Documents/Issues/Business/Intro_Guiding_PrinciplesBusinessHR.pdf

Similarly, the World Bank's Environmental and Social Framework (ESF) requires borrowers to establish project-level GRMs under Environmental and Social Standard 10 (ESS10), enabling affected stakeholders to raise concerns

and obtain timely redress (World Bank, 2018). Comparable requirements are set out in the IFC Performance Standards (IFC, 2012) and the OECD Guidelines for Multinational Enterprises (OECD, 2011), which embed grievance systems into corporate accountability and due diligence frameworks.

At the national level, legal underpinnings for GRMs often derive from constitutional rights such as the right to life, dignity, livelihood, and access to justice. In Pakistan, for example, Article 9 (security of person), Article 10A (right to fair trial), and Article 19A (right to information) provide a normative foundation for demanding grievance redress.⁸ In addition, administrative law principles oblige public authorities to act lawfully, fairly, and reasonably in addressing citizen complaints.⁹

Furthermore, sectoral statutes and statutory bodies institutionalize grievance redress. The Pakistan Environmental Protection Act (1997) empowers Environmental Protection Agencies (EPAs) to address complaints relating to environmental harm.¹⁰ Independent oversight bodies such as the Federal and Provincial Ombudspersons also provide citizens with formal avenues to seek remedy against maladministration and rights violations.¹¹ In energy and extractive industries, regulators such as the National Electric Power Regulatory Authority (NEPRA) require utilities and project developers to maintain complaint-handling systems, community liaison offices, and grievance desks.¹²

Thus, GRMs stand at the intersection of theory and law: they are grounded in justice and participation theories while reinforced by constitutional guarantees, administrative norms, statutory provisions, and international legal obligations. This dual foundation ensures that grievance systems are not mere "soft" engagement tools but are embedded within the broader legal architecture of rights protection and accountability.

1.3. Why Are GRMs Essential for Large Infrastructure Projects?

Large-scale infrastructure projects, especially those involving energy and extractive industries like coal mining and thermal power generation, often result in significant social, environmental, economic, and cultural disruptions. In contexts like the Thar coalfields of Pakistan, such disruptions manifest as displacement of communities, involuntary resettlement, loss of traditional livelihoods, land, water and air pollution, and cultural disintegration. These risks amplify the need for structured, accessible, and fair GRMs.

In coal-rich but socially vulnerable regions such as Tharparkar, the cumulative impact of extractive projects, including health hazards from particulate matter and emissions, land and groundwater contamination and depletion, and forced relocation necessitates a grievance system sensitive to local socio-cultural contexts. International experience shows that proactive grievance systems can reduce litigation, enable participatory decision-making, and ensure that vulnerable groups are not excluded from benefit-sharing.¹³ Moreover, when designed with community input, GRMs can serve as both early warning systems and platforms for constructive dialogue between project stakeholders.¹⁴

8 https://na.gov.pk/uploads/documents/1333523681_951.pdf

9 <chrome-extension://efaidnbmnnnibpcajpcgiclfndmkaj/https://lib.zu.edu.pk/ebookdata/Law/Constitutional%20and%20Politcal%20History%20of%20Pakistan-by%20Hamid%20Khan.pdf>

10 <https://epd.punjab.gov.pk/system/files/PEPA%201997.pdf>

11 chrome-extension://efaidnbmnnnibpcajpcgiclfndmkaj/https://mohtasib.gov.pk/Sitelimage/Downloads/Annual%20Reports/annual_report_2020.pdf

12 chrome-extension://efaidnbmnnnibpcajpcgiclfndmkaj/https://khalidzafar.com/wp-content/files_mf/1713873512CONSUMERSER-VICEMANUAL_Revised_nepra.pdf

13 https://www.scribd.com/fullscreen/21356198?access_key=key-d387qdvel3wbc9nnmxk

14 <https://www.ifc.org/en/insights-reports/2000/publications-gpn-grievances>

1.4. International Grievance Redress Mechanisms (GRMs) Models

Many countries with prevalent environmental and social challenges caused and exacerbated by large scale power projects have developed localized approaches that embed GRMs in national law, integrate third-party oversight, and ensure inclusive community engagement. Both the developed and developing countries have ensured that some aspect of human rights and complaint registration and resolution is incorporated in the planning of large scale infrastructure projects, especially in the energy sector. Some examples based on specific power projects are highlighted in Table 1.1.

Table 1.1. Lessons from Global Case Studies of Coal Power Plants

Region	Key Standards & Practices	Project Example	Key Features of GRM	Committee Formation & Transparency
India	Environmental Impact Assessment (EIA) Notification (2006); National Green Tribunal Act; IFC Performance Standards.	Tata Mundra Ultra Mega Power Project ¹⁵	<ul style="list-style-type: none"> – Local committees with multilingual access – World Bank's Inspection Panel involved – Third-party audits and ombudspersons involved 	GRM committees formed under EIA guidelines with public consultations; Local Representation via <i>Gram Sabhas</i> ¹⁶ ; Issues logged digitally; <i>Weak on gender inclusion.</i>
Indonesia	Presidential Regulation No. 16/2012 on Land Acquisition; Enhanced under Just Energy Transition Plan (JETP); ADB social safeguard policies also apply.	Cirebon Coal-Fired Power Plant (West Java) ¹⁷	<ul style="list-style-type: none"> – GRM built under Japanese and Korean financing conditions – Includes village grievance desks, public hearings, SMS/text-based complaints – Independent monitoring by NGOs like WALHI (Friends of the Earth) 	Independent GRM teams linked with affected village units; Uses "Kampung-level consultations" ¹⁸ ; Annual disclosure required; Committees include CSOs.
South Africa	Just Transition Framework (2022); Integrated Resource Plan (IRP); Section 24 of Constitution on environmental rights.	Kusile Coal Power Station (Mpumalanga) ¹⁹	<ul style="list-style-type: none"> – Required under South Africa's (EIA) regulations – Eskom²⁰ implemented public grievance cells and community liaison offices – Involves Social Performance Units to handle socio-environmental grievances – Delayed redressal response will undermine credibility of South Africa's Just Transition Framework (2022) and the Integrated Resource Plan (IRP) 	Community Liaison Forums used to establish GRMs; Legal empowerment of mining-affected communities; Open hearings and minutes published.

¹⁵ https://justtransition.in/wp-content/uploads/2023/09/Just-Transition-September-2023_compressed.pdf

¹⁶ Gram Sabhas: A Gram Sabha is a village assembly in India, comprising all adult members registered to vote within a Gram Panchayat's jurisdiction.

¹⁷ https://odi.org/documents/8984/Putting_the_just_in_Just_Energy_Transition_Partnerships-what_role_for_the_MDBs.pdf

¹⁸ Kampung-level consultations: This means that the consultations are being conducted at the village or neighborhood level, ensuring that grassroots community members are directly involved.

¹⁹ <https://www.sei.org/wp-content/uploads/2024/09/just-transition-coal-south-africa.pdf>

²⁰ Eskom: Eskom is a South African state-owned power utility responsible for generating, transmitting, and distributing electricity.

Germany	Coal Phase-Out Act; Environmental Appeals Act; Aarhus Convention. ²¹	Lusatia Coal Transition Projects ²²	<ul style="list-style-type: none"> – Public hearing mandates – Financial compensation tied to grievance redress [EU Just Transition Mechanism] 	Public environmental ombudsman, local councils, and digital GRM dashboards; Mandatory public disclosures and appeal rights; Strong procedural and data transparency.
Canada	Impact Assessment Act (2019); UNDRIP compliant; Mining Watch standards adopted.	Alberta Power Projects ²³	<ul style="list-style-type: none"> – Multicultural grievance committees – Online dashboards for tracking complaints in real-time 	Joint Review Panels with Indigenous participation; Federal registry for grievances; Case-by-case mediated resolutions; 30-day public comment rule.
USA	National Environmental Policy Act (NEPA); Clean Air Act; EPA's Environmental Justice and Community Engagement Plan.	Brayton Point Coal Plant (Massachusetts) ²⁴	<ul style="list-style-type: none"> – Environmental Justice Taskforce – EPA-compliant community outreach programs 	Formal administrative appeals; Public comment periods; Stakeholder sessions and litigation rights; Federal Register publications; Focus on transparency and evidence-based decisions.

1.5. Applying Global Lessons to the Thar Coalfields

Global GRM practices discussed above offer key insights for improving grievance redressals in coal mining and coal based power generation affected regions across Pakistan. Effective GRMs must be locally anchored, engaging trusted Community-Based Organizations (CBOs), using local languages, and institutionalize these mechanisms through provincial environmental and mining laws.

The Thar coalfields, especially Blocks 1 and 2, represent flagship energy investments under the China-Pakistan Economic Corridor (CPEC). However, these developments have occurred in a region home to indigenous Thari communities, whose traditional livelihoods, health, and environment are increasingly under strain.

Projects led by the Sindh Engro Coal Mining Company (SECMC) and Shanghai Electric have drawn criticism for inadequate compensation, forced relocations, and non-transparent grievance processes.²⁵²⁶ Reports from the Asian Development Bank (2021) and Human Rights Commission of Pakistan (2020) highlight systemic weaknesses including poor outreach, lack of gender sensitivity, and barriers to access.²⁷

Globally, well-functioning Grievance Redress Mechanisms (GRMs) share several core characteristics that should also guide local implementation. These include early and inclusive community consultations, especially with women, youth, and marginalized groups to foster ownership and trust. Effective GRMs typically feature digital tracking systems for complaints and resolutions, ensuring transparency and accountability. Independent third-party oversight, regular audits, and defined timelines for addressing grievances are also standard features. Furthermore,

21 https://climate-laws.org/document/law-on-the-reduction-and-termination-of-coal-fired-power-generation-and-the-amendment-of-further-laws-kohleausstiegsgesetz_76d0#:~:text=On%20July%203rd%2C%202020%2C%20the,Main%20document

22 https://klimagesund.de/wp-content/uploads/2020/12/Lancet-Countdown-Policy-Brief-Germany_ENG.pdf

23 <https://laws.justice.gc.ca/eng/acts/i-2.75/index.html>

24 <https://www.epa.gov/environmentaljustice>

25 <https://www.brecorder.com/news/40065225/thar-coal-mine-villagers-demanding-compensation-for-forced-acquisition-of-land>

26 <https://dailytimes.com.pk/168911/secmc-flayed-ignoring-local-job-seekers>

27 <https://www.crisisgroup.org/asia/south-asia/pakistan/297-china-pakistan-economic-corridor-opportunities-and-risks>

ideal GRMs incorporate user feedback through satisfaction surveys and offer mobile-access options to ensure accessibility for remote and underserved populations²⁸

While global frameworks offer essential guidance, the unique ecological fragility and cultural dynamics of Thar demand localized, community-driven solutions. The Thar region, with its unique environment and culture, needs solutions that come from its own communities and their indigenous knowledge. In the next section, we will explore the socio-political and environmental realities of Tharparkar and why a customized grievance mechanism is urgently needed.



Context of Tharparkar

2.1. Tharparkar's Socio-Environmental Context

Tharparkar, situated in southeastern Sindh, Pakistan, spans approximately 19,638 square kilometers and is home to over 1.6 million people with over 95% living in rural areas, according to the Pakistan Bureau of Statistics (PBS) 2023 Census, as shown in figure 2.1. It is characterized by a dry, arid climate and is part of the larger Thar Desert ecosystem. Most of the population consists of the indigenous communities (Meghwar, Kohli, Bheel), and relies on pastoralism and rain-fed agriculture for subsistence.^{29 30} Ethnically, the district is unique, with a sizable Hindu minority making up about 40–45% of the population, contributing to its rich cultural diversity. Over 87% of the population lives below the poverty line, with a high multidimensional poverty index score.^{31 32}

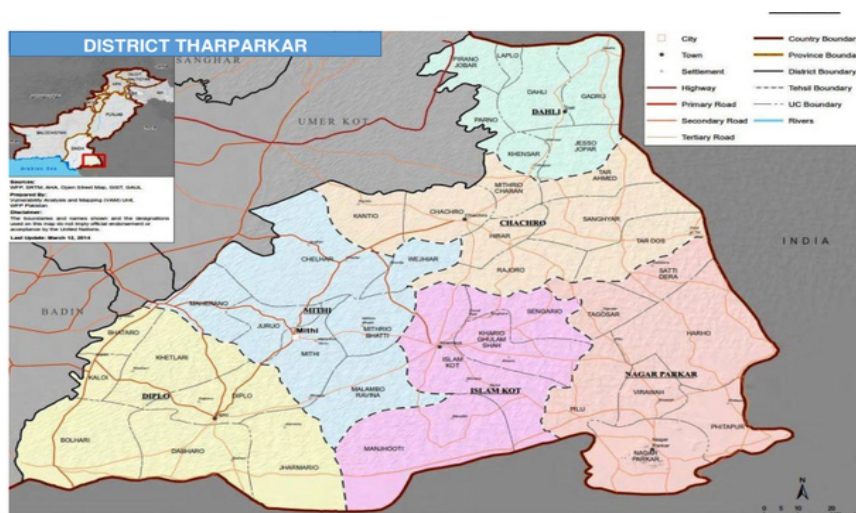


Figure 2.1. Map of Tharparkar (Source: Relief-Web ³³)

Food insecurity, child malnutrition, and gender disparities in access to resources are widespread, exacerbated by recurring droughts.³⁴ Water scarcity is turning out to be the most pressing environmental challenge. Groundwater, which is often brackish or contaminated with fluoride or arsenic, is the primary source of drinking water. Whereas, over 70% of people in Tharparkar lack access to clean drinking water. According to a research conducted by the Pakistan Council for Scientific and Industrial Research (PCSIR) and Dow University of Health Sciences (DUHS), which was reported by Reuters, only 5% of the population in Tharparkar has access to portable water that is free of contaminants and clean.³⁵ These stressors, coupled with under-resourced public services, have resulted in extremely low literacy rates and poor health outcomes, especially among women and children as shown in Figure 2.2.

Women and girls also disproportionately bear the burden of water collection, walking long distances daily – 2 – 5 kilometers to nearby villages – to fetch water for daily use, often under extreme weather conditions.³⁶ The fragile desert ecosystem, characterized by sand dunes, sparse vegetation, and unpredictable rainfall, is highly susceptible to climate change and unintended depletion and destruction of groundwater, land, and native vegetation,

²⁹ <https://ideas.repec.org/a/pid/journal/v57y2018i3p307-321.html>

³⁰ <https://www.pbs.gov.pk/sites/default/files/population/2017/results/04903.pdf>

³¹ <https://www.dawn.com/news/1774959>

³² <https://historypak.com/tharparkar/>

³³ <https://reliefweb.int/map/pakistan/pakistan-district-tharparkar-12-march-2014>

³⁴ https://www.researchgate.net/publication/330415301_Climate_Change_and_Drought_Impact_of_Food_Insecurity_on_Gender_Based_Vulnerability_in_District_Tharparkar

³⁵ <https://appna.org/thar-water-wells/>

³⁶ <https://ojs.ahss.org.pk/journal/article/download/687/729/1235#:~:text=Ironically%2C%20the%20household%20members%20of%20such%20households,from%20the%20wells%20is%20an%20arduous%20one.>

often driven by unchecked mining, infrastructure development, and resource extraction, which accelerates desertification and undermines local livelihoods.

Increasing aridity and extreme weather events caused by anthropogenic forces are driving climate-induced migration, altering the demographics and social fabric of the region.³⁷



Figure 2.2. Living Realities in Thar. Water Scarcity, Livelihoods, and Community Resilience³⁸

2.2. Development and Evolution of Thar Coal Projects – Timeline and Stakeholders

Thar coalfields, holding the world's seventh-largest lignite coal reserves, were discovered in 1992, revealing over 175 billion tons of lignite coal. For years, development of these coalfields was stalled due to logistical, financial, and infrastructural challenges. Despite its potential, it was not explored until the mid-2000s when significant investments began to transform the site into an operational mining and energy generation hub. The momentum gathered only after 2009 when Pakistan's energy crisis and international investment opened pathways for large-scale exploration.³⁹

The energy crisis of the early 2010s peaked in 2013 with a 7,000 MW supply shortfall (one-third of peak demand). The crisis, as a result, highlighted the need for energy diversification. Under the China-Pakistan Economic Corridor (CPEC), Thar coal was designated as a strategic national asset. To enable the development of Thar's coal resources, the Government of Pakistan introduced key policy instruments between 2013 and 2022.⁴⁰ These included the Power Generation Policy 2013, which offered upfront tariffs for coal-based Independent Power Producers (IPPs), and the Framework for Power Co-Generation 2013 (Bagasse/Coal), which incentivized private sector participation.⁴¹ Thar coal was also declared a 'Project of National Importance' under CPEC, facilitating fast-track approvals and financial support.⁴² In this way, The government addressed the shortfall by prioritizing energy projects under

37 <https://thepdr.pk/index.php/pdr/article/download/2787/2058/1835#:~:text=in%20District%20Tharparkar%20Climate%20change%20has%20now,in%20the%20semi%20arid%20desert%20of%20district%20Tharparkar.>

38 <https://www.aljazeera.com/gallery/2017/1/2/tharparkar-the-history-and-culture-amid-catastrophe>

39 https://d1wqtxts1xzle7.cloudfront.net/90306703/2-libre.pdf?1661547667=&response-content-disposition=inline%3B+-filename%3DAssessing_the_Socio_Economic_and_Environ.pdf&Expires=1749555419&Signature=eXF3eOdB13KNEZ86OodBplpRL-N~eoMP-p3jwLfx2beTSmVJEswDh8g6LkceW5~2Ti4EbxiHtW0B--W8HU-MC~FCsSNcV1blsJEd61NivKjjd8TnacRRlym-alhSww-J~n5x3x8V4kMd3mv4-r5o0MNNWPaxfeD1QCJQ6w7CEvj322NhvpV02yUiOOBWtyaAAp5WIWqR4EA1pUiP74Co-t6~Qf8Jx-ar-2d2fjN8Vdz3sRJQX3Z3LTFaJSBJPI49lp3d2AMBBSqr5YfmgIBq5AEI53PZyb4Z4du9sdi05wpgBK4135iJsYUa-ZkXVQKN-B1AKm8zbJkmLTUKlmyEZ1xA__&Key-Pair-Id=APKAJLOHF5GGSLRBV4ZA

40 <https://www.nation.com.pk/08-Feb-2013/nepra-determines-upfront-tariff-for-coal-based-power-plants>

41 <https://policy.asiapacificenergy.org/ru/node/798>

42 <https://www.brecorder.com/news/4201268/upfront-tariff-of-coal-fired-power-plants-ti-p-receives-complaints-against-nepra-for-approving-rs-150-per-unit-hike-201405311188025>

CPEC, focusing on coal, hydropower, and renewables.

In 2011, the Sindh Engro Coal Mining Company (SECMC), was formed as a public-private partnership between the Government of Sindh, Engro Energy Limited, Thal Limited, Hub Power Company (HUBCO), and Chinese investors including China Machinery Engineering Corporation (CMEC).

By 2018, installed capacity rose by 30%, from 22,812 MW (2012–13) to 29,573 MW, alleviating, though not fully resolving the crisis.^{43 44 45} By 2019, Block II of the Thar coal project, operated by the Sindh Engro Coal Mining Company (SECMC) in partnership with the Government of Sindh and Engro Powergen Thar Limited (EPTL), successfully commenced commercial-scale coal extraction and electricity generation. This marked a historic milestone, as it was the first time Pakistan began using its indigenous lignite coal reserves to produce electricity. The integrated project includes a 3.8 million tons of coal extraction per annum from an open-pit coal mine and a 660 MW mine-mouth power plant, developed under CPEC. This achievement not only contributed to national energy security but also signaled a shift toward reducing reliance on imported fuels.^{46 47}

Building on this foundation, Block I coal-fired power plant, led by Shanghai Electric, was commissioned in December 2022 with a capacity of 1,320 MW. In 2024, Thar Coal Power Plant Block 1 & Block 2, collectively contribute approximately 2,640 MW to Pakistan's national grid, with expansion plans targeting 3,280 MW by 2025.^{48 49} The Thar coal project remains a central component of the CPEC, representing a strategic initiative to enhance Pakistan's energy security by reducing dependence on imported fuels.^{50 51 52}

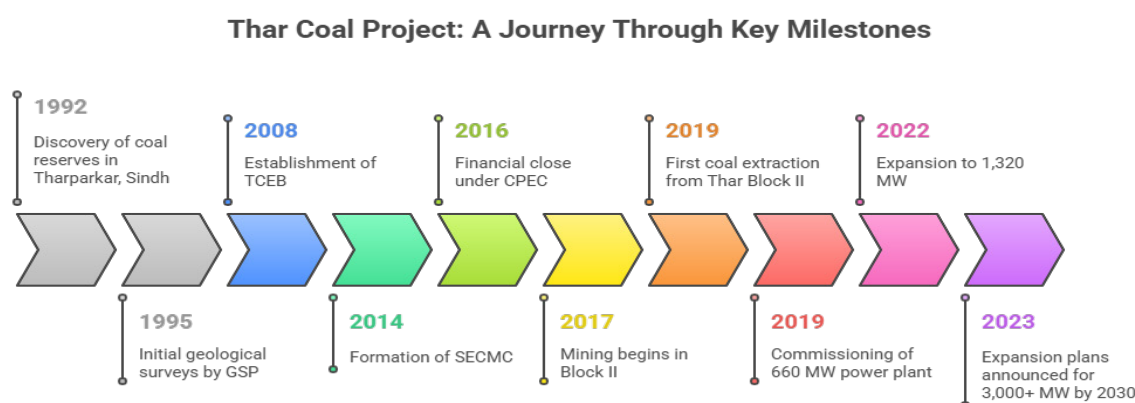


Figure 2.3. Thar Coal Project: A journey through Key Milestones⁵³

The timeline and key milestones of the Thar coal project; beginning with the discovery of coal, followed by exploration, feasibility studies, and the planning of coal mining and power plants, are illustrated in the figure 2.3. The figure also highlights the project's development under CPEC, its subsequent expansion, and future plans, based

43 https://www.boell.de/sites/default/files/2019-12/Thar_Coal_Project.pdf

44 <https://sindhenergy.gov.pk/sindh-coal-authority/#::~text=ESTABLISHMENT%20OF%20TCEB%20To%20fast%20track%20the,with%20representation%20from%20Provincial%20and%20Federal%20Governments.>

45 https://pid.gov.pk/site/press_detail/22008

46 https://www.boell.de/sites/default/files/2019-12/Thar_Coal_Project.pdf

47 <https://www.engroenergy.com/secmc>

48 <https://cpec.gov.pk/project-details/9>

49 <https://www.newswire.ca/news-releases/shanghai-electric-complete-pakistan-s-largest-thermal-power-project-with-local-fuel-thar-block-1-integrated-coal-mine-and-power-project-for-30-days-888455760.html>

50 <https://cpec.gov.pk/project-details/3>

51 <https://cpec.gov.pk/project-details/9>

52 <https://www.reuters.com/business/energy/pakistan-push-chinese-utilities-pakistan-switch-domestic-coal-2024-07-21/>

53 https://www.gem.wiki/Thar_Block_II_power_station

on the information discussed above.^{54 55 56}

The key investors and stakeholders involved in the Thar coal project include:

- SECMC (a public-private partnership involving the Government of Sindh and Engro),
- Shanghai Electric and Engro Powergen Thar Limited (Operator of Block I and Block 2)
- Hub Power Company (HUBCO)
- ThalNova
- TEL (Power producers)

Financial support from institutions (Financiers) such as:

- China Development Bank
- Industrial and Commercial Bank of China (ICBC)
- China Exim Bank

While coal development brings the promise of energy security and economic uplift, it also introduces significant social, environmental, and cultural disruptions. The Communities near Block I and II have experienced land dispossession, water depletion, and worsening air quality. The coal boom has prompted concerns over displacement, significant social and cultural disruption, and environmental degradation, necessitating a strong grievance redressal.^{57 58}

2.3. The Urgent Need for Effective Community-Centric GRMs in Tharparkar

If the existing Grievance Redress Mechanism (GRM) is weak or absent, the project may face significant operational risks such as protests, delays, and even sabotage. It may also lead to reputational damage at both national and international levels, legal challenges, investor withdrawal, social instability, and non-compliance with global standards such as the SDGs, IFC Performance Standards, and Equator Principles which ultimately weakens Pakistan's credibility in multilateral partnerships.^{59 60} The lack of formal platforms for airing grievances has led to neglect, distrust and periodic local resistance.

Similarly, negative perceptions deter foreign investment and trigger scrutiny from international financing bodies (like the World Bank and Asian Development Bank (ADB)) mandate GRMs under environmental and social safeguards.^{61 62} Moreover, the absence of credible grievance channels may radicalize disenfranchised communities, undermining national security in a geopolitically sensitive region.

54 <https://www.brecorder.com/news/4392709>

55 <https://hubpower.com/semc/>

56 <https://www.engro.com/press-releases/a-historic-milestone-for-mining-and-power-projects-in-thar-block-ii-as-sindh-engro-coal-mining-company-and-engro-powergen-thar-limited-achieve-financial-close/>

57 <https://www.sciencedirect.com/science/article/abs/pii/S0305750X24000949>

58 https://d1wqtxts1xzle7.cloudfront.net/38395760/1-s2.0-S2214790X15000465-main-libre.pdf?1438831695=&response-content-disposition=inline%3B+filename%3DReligious_Identity_and_Coal_Development.pdf&Expires=1749635409&Signature=eW-U-s0ipfLXRMFRLRwyc4WH43nzreHgqsljfsJCSqfJUeCKzsOKcFob-h9pc8kvVHs2PDhMwxV7Sdt6A3yoCfBx2LUgxRP4T896Gs7WUz-mvUmi7s1fzJU9XEnszl2dOkzvJ1mYvLqzIMI9CmpJuY0ui8ZTApsVZKJpVzv3LTf6z27gOILwBPk1Qg-PAeB3L9apJAF4RZWQBvVzL-ObUO-Wsf5b-gMLeG9xhlhI92iTaWbARsHoKaXR23NAIpXA3vHmZkaA4G35zABQwrHJkCXA7TbaPrWUKE~C-HMpzL3jdOjUvzuqrqxbbm6XwEezlr2mDaa~Silrq1lkidlfKWQIA__&Key-Pair-Id=APKAJLOHF5GGSLRBV4ZA

59 https://m.moam.info/international-finance-corporations-guidance-notes-ifc_6479b145097c4768028b6afd.htm

60 <https://www.dawn.com/news/1860115>

61 <https://www.dawn.com/news/1908188>

62 <https://defence.pk/threads/world-bank-withdraws-support-to-thar-coal-project.58122/>

Large-scale coal development in Tharparkar has magnified and altered socio-environmental impacts. Field studies and consultations reveal that many residents were not adequately consulted prior to land acquisition, while compensation and resettlement programs remain contentious.⁶³

The Thar coalfields' development hinges on balancing corporate-state interests with local community welfare. GRMs serve as an institutional buffer, ensuring stability, transparency, and legitimacy in project execution. Without them, the project risks operational disruptions, reputational damage, and long-term instability. The International Finance Corporation's (IFC) Performance Standards mandate that affected communities must have access to structured, predictable channels for raising grievances.⁶⁴

A robust, inclusive, and transparent GRM is not just an ethical obligation, it has become a strategic imperative. It will ensure that community concerns are addressed before they escalate and will build long-term trust, aligning Thar's development with Pakistan's international environmental and social commitments. In the next chapter, our focus will be on existing GRM practices in Thar coalfields Blocks I and II, including institutional gaps and community perceptions based on our fieldwork findings.



63 <https://www.sciencedirect.com/science/article/abs/pii/S0305750X24000949>

64 https://m.moam.info/international-finance-corporations-guidance-notes-ifc_6479b145097c4768028b6afd.html

Review of Existing GRM Mechanisms in Thar Coal Blocks

Large-scale infrastructure projects in Pakistan, including coal mining and power generation in Thar, are legally required to conduct comprehensive Environmental Impact Assessments (EIAs) before implementation. Under the Pakistan Environmental Protection Act (PEPA) and the Sindh Environmental Protection Act (SEPA) 2014, an EIA is mandatory for project approval (PC-1 and PC-2 stages). A key component of the EIA is the inclusion of a Grievance Redress Mechanism (GRM), designed in consultation with communities to ensure affected people can raise concerns and seek redress.⁶⁵

Sindh Environmental Protection Agency (SEPA), along with the federal Environmental Protection Agency (EPA) and the Ministry of Climate Change and Environmental Coordination, is responsible for EIA oversight. Additionally, environmental guidelines under China's Belt and Road Initiative (BRI) and the CPEC also require inclusive, transparent GRMs, particularly for projects involving state-owned enterprises such as Shanghai Electric. These frameworks stress public participation, especially for vulnerable communities, as a baseline safeguard.^{66 67}

This chapter critically reviews the Grievance Redress Mechanisms (GRMs) outlined in the Environmental Impact Assessment (EIA) documents of two major coal power development projects in Tharparkar: Block I, operated by Shanghai Electric and SSRL, and Block II, operated by EPTL. Given the scale of environmental and social disruption caused by coal-based energy development in these areas, effective and inclusive GRMs are essential for safeguarding community rights, promoting transparency, and preventing conflict.

The review draws on the EIA reports for both projects and assesses their commitments in light of international best practices, national legal expectations, and field findings gathered during this study.

3.1. Key GRM Provisions and Critical Gaps Identified in Block I and Block II

The acquisition of the Environmental Impact Assessments (EIAs) for Block I and Block II involved a protracted and resource-intensive process. These documents were eventually obtained through formal Right to Information (RTI) applications, which required several months to be fulfilled. Prior to this, multiple efforts were undertaken, including extensive online searches, formal written requests to the respective companies, and direct engagement with both corporate representatives and relevant government authorities. Despite repeated assurances from various stakeholders, the provision of these documents was subject to significant delays, highlighting systemic challenges in accessing critical environmental governance information.

Despite the formal legal obligations for community engagement and environmental accountability, a critical review of the EIA reports for Thar Block I (Shanghai Electric) and Thar Block II (Engro Powergen Thar Limited) reveals significant gaps in the design, accessibility, and implementation of GRMs. The company's official website also hosts no publicly accessible documentation or details related to its grievance redress mechanism, indicating a lack of transparency in publicly communicating such critical frameworks.

65 [https://emis.gob.pk/Uploads/GRADES-B_and_STEP-B_Environmental_and_Social_Management_Framework_\(ESMF\).pdf](https://emis.gob.pk/Uploads/GRADES-B_and_STEP-B_Environmental_and_Social_Management_Framework_(ESMF).pdf)

66 [https://sindhlaws.gov.pk/setup/publications_SindhCode/PUB-15-000258.pdf#:~:text=\(1\)%20These%20regulations%20may%20be%20called%20the,Examination%20and%20Environmental%20Impact%20Assessment\)%20Regulations%2C%202014.&text=\(2\)%20Notwithstanding%20anything%20contained%20in%20regulations%203%2C,to%20file%20an%20EIA%20with%20the%20Agency.](https://sindhlaws.gov.pk/setup/publications_SindhCode/PUB-15-000258.pdf#:~:text=(1)%20These%20regulations%20may%20be%20called%20the,Examination%20and%20Environmental%20Impact%20Assessment)%20Regulations%2C%202014.&text=(2)%20Notwithstanding%20anything%20contained%20in%20regulations%203%2C,to%20file%20an%20EIA%20with%20the%20Agency.)

67 [https://www.hec.gov.pk/english/services/RnD/RRIF/Documents/ENVIRONMENTAL%20AND%20SOCIAL%20MANAGEMENT%20FRAMEWORK%20%28ESMF%29/Annexure%204-%20Pakistan%20Environmental%20Protection%20Agency%20%28IEE%20and%20EIA%29%20Regulations.docx#:~:text=1\)%20No%20proponent%20of%20a,being%20contrary%20to%20environmental%20objectives.](https://www.hec.gov.pk/english/services/RnD/RRIF/Documents/ENVIRONMENTAL%20AND%20SOCIAL%20MANAGEMENT%20FRAMEWORK%20%28ESMF%29/Annexure%204-%20Pakistan%20Environmental%20Protection%20Agency%20%28IEE%20and%20EIA%29%20Regulations.docx#:~:text=1)%20No%20proponent%20of%20a,being%20contrary%20to%20environmental%20objectives.)

While both EIAs acknowledge and mandate the importance of grievance mechanisms for achieving stakeholder cooperation and “**social license to operate**” theoretically, they fall short of establishing concrete, enforceable, and accessible GRM systems. The existing GRM sections tend to emphasize generic sustainability principles and public relations language rather than providing functional and accountable frameworks for complaint handling.

3.1.1. Block I (Shanghai Electric) – EIA Commitments & Gaps

The GRM commitments in the Block I EIA are significantly vague and largely non-operational. The EIA for Block I (2×660 MW Coal Power Plant) reveals a critical absence of a structured or community-accessible GRM in Section 7.16 “Grievance Redress Mechanism” of the EIA report. The document briefly states that a grievance mechanism will be developed “to cater for the issues of the people that can be affected by the Project,” but it does not provide any operational details. The Framework for Grievance Redress Mechanism mandates that “The owners will develop a stakeholder grievance redress mechanism.” It also admits that no specific legal requirement mandates a GRM, suggesting a weak institutional foundation for accountability.

3.1.1.1. GRM Provisions in Block I EIA (Shanghai Electric)

The EIA for Block I proposes a multi-tiered grievance redress mechanism, it suggests the establishment of a Public Complaints Unit (PCU) to receive, log, and resolve complaints, alongside a Grievance Redress Committee (GRC) tasked with overseeing the PCU and serving as the final non-judicial authority for unresolved cases. Additionally, it refers to the appointment of Grievance Focal Points (GFPs) from within the community, who would be trained by the project owners to report grievances. The document also loosely references non-judicial resolution pathways and supervisory structures, implying some intent toward procedural escalation within the company’s internal framework.

3.1.1.2. Critical Weaknesses

Despite this basic outline, it mentions that the owners of the project will develop a functional and operational GRM framework. The use of non-committal language such as “may include” and “will be developed” indicates that a formal mechanism does not exist hence cannot be operationalized, and lacks formal commitment. There is no detailed plan for how community complaints will be received, processed, or resolved. The proposed GRM omits essential design elements, such as defined timelines, responsible implementing institutions, and accessible complaint channels whether mobile, written, oral, or anonymous.

Moreover, there is a complete absence of legally binding provisions such as gender-sensitive features, local language support (Sindhi or Thari), and culturally appropriate outreach. The framework does not include any stakeholder communication strategy or public awareness component to inform communities about the GRM. Crucially, the EIA admits that no legal mandate requires a GRM, signaling a lack of urgency and accountability on the part of the project proponents.

There is also no mention of independent oversight, escalation procedures to government regulators or financiers, or monitoring systems to assess effectiveness. Unlike Block II, there are no commitments to multilingual accessibility, gender-balanced staffing, or sustained community engagement. As such, the proposed GRM in Block I appears to be a tokenistic compliance measure rather than a functional or community-centered system of redress.

The Block I framework lacks basic design features of a credible GRM. The absence of structure, timelines, and oversight makes it more of a symbolic gesture than a functional mechanism. It does not reflect the severity of grievances on the ground, especially in highly affected villages in close vicinity.

3.1.2. EIA Report of Block II (Engro Powergen Thar Limited) – GRM Commitments & Gaps

The EIA report for Block II outlines a theoretical framework for a GRM that aims to promote cooperation between project developers and local stakeholders. Compared to Block I, Block II (330 MW project) as mentioned in section 7.5. “Grievance Redress Mechanism” of the EIA report that demonstrates a slightly more evolved approach to community engagement and grievance management, though still far from adequate. It states that grievance redress will contribute to *“forming and strengthening relationships between project management and stakeholder community groups”* and help secure the project’s *“social license to operate.”*

3.1.2.1. GRM Provisions in Block II EIA (Engro Powergen Thar Limited)

The EIA for Block II presents a more structured approach to grievance redress, with several institutional components outlined. It proposes the establishment of a Public Complaints Unit (PCU), responsible for receiving, logging, and resolving community grievances. The mechanism includes Grievance Focal Points (GFPs) having one male and one female literate representative from each affected community, tasked with reporting grievances to the PCU. A Public Liaison Officer is designated to lead the PCU, supported by two coordinators (one male, one female), while female outreach staff are assigned to conduct community visits to ensure gender-sensitive engagement.

The EIA also mentions the creation of a Community Liaison Office (CLO), which would serve as a hub for communication and feedback. On paper, these commitments indicate an intent toward inclusivity, gender responsiveness, and multilingual accessibility. Operational principles such as transparency, accountability, and confidentiality are referenced, along with a pledge to use local languages and multiple channels of communication. An awareness campaign is also promised to inform communities about the purpose and functions of the PCU.

The scope and mandate of the CLO are not clearly defined, and it appears to function more as a corporate social responsibility (CSR) initiative rather than an independent grievance mechanism. Although the EIA refers to a “mechanism for community feedback,” it does not describe any formal procedures for complaint intake, verification, resolution, or escalation. The structure lacks detail on how feedback would be recorded, tracked, or evaluated.

3.1.2.2. Critical Weaknesses

The proposed GRM does not include specific timelines or deadlines for resolving complaints, making the redress process potentially ineffective and open-ended. The PCU is entirely company-operated, with no provision for external oversight, undermining the trust of community stakeholders. While the presence of GFPs appears participatory, these individuals are selected and trained by the company, raising concerns about their independence and capacity to represent marginalized groups, such as women, religious minorities, or lower-caste community members.

Although gender balance is acknowledged in staffing, the implementation of gender-sensitive approaches remains superficial. There is no mention of safe spaces, confidential complaint channels, or procedures tailored to vulnerable populations. Furthermore, while the EIA asserts that the GRM will be multilingual, it offers no detail on how translation, interpretation, or cultural mediation will be carried out in practice.

Ultimately, while the Block II GRM is more thoughtfully constructed than that of Block I, it still reflects a top-down, company-controlled architecture. It lacks legal enforceability, independent verification, and public accountability mechanisms such as complaint dashboards or regular reports. The absence of robust procedural clarity, external monitoring, and culturally embedded trust-building elements means that the mechanism, despite its promising structure on paper, remains insufficiently grounded in community empowerment and rights-based principles.

3.1.3. Comparative Evaluation

While the GRM proposed for Block II demonstrates a comparatively better understanding of participatory structures than Block I, it still suffers from a top-down, company-dominated design that risks alienating affected communities. They lack independent oversight, legal enforceability, and the culturally embedded elements needed to build community trust. Essential components of a robust GRM are absent, such as clear complaint-handling procedures, defined timelines for resolution, public grievance dashboards, and third-party verification.

The review of both EIA reports reveals a shared pattern of minimal compliance, corporate-led stakeholder engagement, and the absence of functional, enforceable grievance structures. These gaps highlight a significant disconnect between the GRM frameworks presented on paper and the lived experiences of impacted communities in Tharparkar. Most concerning is the failure of both projects to align with national and international standards on grievance redress, such as the IFC Performance Standards, ADB Safeguard Policies, and China's BRI Green Development Guidelines. This represents a missed opportunity for regulatory compliance, legitimacy, and meaningful stakeholder engagement.

Importantly, the objectives of both GRMs are not rights-based. Rather than being mechanisms to ensure justice or redress for harm, they appear designed to protect corporate interests and maintain operational harmony. Neither mechanism is rooted in local cultural norms, nor do they integrate with community governance structures or legal accountability mechanisms. Community ownership is entirely absent, residents are treated as passive recipients of corporate systems, not as co-creators or rights-holders in the grievance process.

The key gaps in the proposed GRMs within both EIA are highlighted in table 3.1.

Table 3.1. Comparative Evaluation of Block I and Block II

Criteria	Block I (Shanghai Electric)	Block II (Engro Powergen)
GRM Type	Symbolic/Unstructured	Semi-Structured
Gender Sensitivity	✗ Absent	⚠ Mentioned, not defined
Local Language Accessibility	✗ Not addressed	✓ Promised
Escalation Process	⚠ GRC Mentioned	✗ None
Community Participation	⚠ Tokenistic	⚠ Limited to trained GFPs
Awareness Campaign	✗ Not included	✓ Planned
Independence	✗ Fully company-run	✗ Fully company-run
Operational Clarity	✗ Lacking	⚠ Partial

Despite being included in formal EIA documentation, the GRMs for Block I and Block II are largely non-operational and lack credible enforcement pathways. While Block II offers a marginal improvement in structure, both frameworks fail to meet basic thresholds of transparency, inclusion, and accountability. Most notably, they lack:

- Accessibility for women, non-literate individuals, and remote communities
- Third-party monitoring or oversight mechanisms
- A clear pathway for escalation to government regulators or project financiers

These shortcomings underline the urgent need for a community-approved, independent, and culturally sensitive grievance mechanism. It also aligns with international good practices, including those mandated under BRI and CPEC frameworks, to ensure that grievance redress in Tharparkar meets global standards of justice, transparency, and social equity.

3.2. Disparities Between Policy and Practice

Given the limitations in documented GRM structures, our review conducted fieldwork in Tharparkar to engage directly with the communities adjacent to Thar coal power plants in Block I and Block II. Communities in Shanghai Electric (Block I) reported zero awareness of any GRM. No records of focal persons, liaison officers, or GRM tools were available. In contrast, Block II had a partial structure under ThalNova,⁶⁸ involving limited collaboration with CSOs like Thardeep and Aware.⁶⁹ However, even there, the system lacked transparency and responsiveness. Table 3.2, below is a summary of GRM availability in both blocks:

Table 3.2: Summary of GRM Accessibility in Block 1 and Block 2

Project	Public GRM Available	Focal Person	CSO Representative	Key GRM Elements Noted
Block 1 (Shanghai Electric)	✗	Not Identified	None	None
Block 2 (Engro Powergen Thar Limited)	✓	Limited Info (Un-official)	Thardeep, Aware NGOs	Complaint form, hotline (non-functional), suggestion box

The stark inconsistency in the documentation and operationalization of GRMs prompted our team to conduct Focus Group Discussions (FGDs) with the affected populations. These discussions highlighted key concerns: the absence of functional grievance platforms, unawareness of rights under environmental Acts, and the lack of community representation in the design and implementation of the GRM systems. These findings underline the non-compliance of responsible agencies and companies with environmental law, especially in terms of transparency, accountability, and inclusivity.

⁶⁸ <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://urckarachi.org/wp-content/uploads/2020/07/EIA-report-vol-1-330MW-Thar-Energy-HubPower-Company-2.compressed.pdf>

⁶⁹ <https://www.nation.com.pk/31-Dec-2022/330mw-coal-fired-thalnova-power-project-commissioned>

Methodology for Development of Community Centric GRM

To evaluate the effectiveness of GRMs in Tharparkar, we adopted a targeted, field-based qualitative methodology grounded in community participation and expert validation. The research followed a multi-stage approach as shown in figure 4.1, beginning with key informant interviews and culminating in a closed-door consultation to verify findings and refine the proposed GRM model.

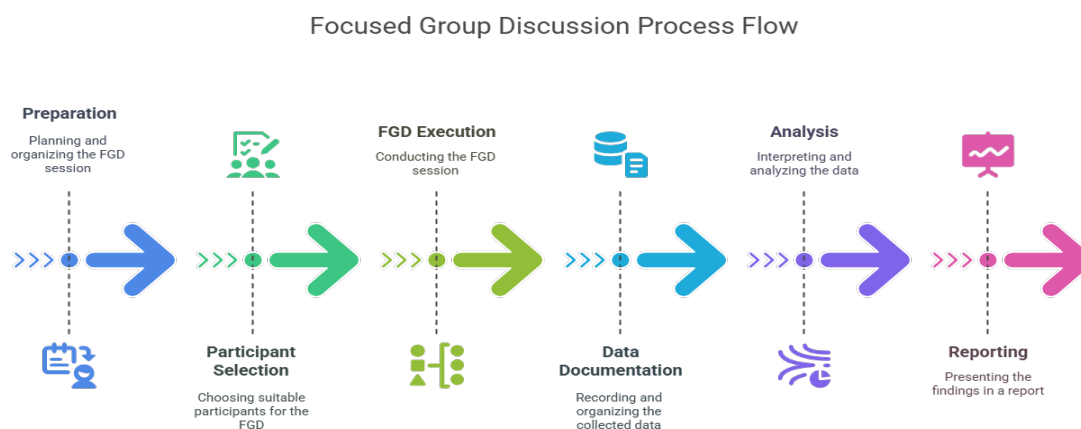


Figure 4.1. Flow Diagram of Methodology

4.1. Preliminary Design and Expert Input

The research process began with a series of semi-structured interviews with community activists, legal experts, environmental practitioners, and social accountability specialists. These initial consultations helped the research team conceptualize a preliminary structure for a contextually appropriate GRM tailored to the socio-cultural landscape of Tharparkar. This early input informed the design of field tools. This initial feedback was instrumental in shaping the field tools, the selection of study locations, and the development of our qualitative instruments.

Based on these insights, two villages were purposely selected for in-depth fieldwork: Khario Ghulam Shah (adjacent to Block I, operated by Shanghai Electric and SSRL) and Thario Halepoto (near Block II, where Engro Energy and ThalNova operate). These sites were chosen due to their geographic proximity to coal infrastructure, exposure to project-related risks such as displacement and land acquisition, and varying levels of community engagement with corporate-led programs. The contrast between a largely disengaged population in Block I and a partially-engaged one in Block II allowed for a comparative analysis of GRM presence and functionality.

4.2. Community-Driven Tool Development

Following village selection, the research team worked closely with local community representatives to co-develop a context-sensitive questionnaire. Demographic, religious, and caste-based diversity were key considerations, ensuring inclusive coverage of all major groups including Muslims, Hindus, Meghwaris, Kohlis, Bheels, Halepotos, and Mehranpotos. Feedback from these stakeholders helped tailor the structure and content of our tools to reflect ground realities and local expectations.

A structured questionnaire (attached in Annexure) was prepared to extract insights on community awareness, perceptions, accessibility, and expectations from grievance redress systems. Different language versions of the questionnaire were developed and used where necessary to accommodate women, youth, and elders. To better accommodate women, youth, and elders, different language versions of the questionnaire were developed and utilized as needed. The final questionnaire was pilot-tested informally with a few community activists to ensure

cultural appropriateness and linguistic clarity.

4.3. Focus Group Discussions (FGDs) and Field Methods

At the heart of our methodology were two Focus Group Discussions (FGDs)—a qualitative research technique where a small group of participants engages in moderated dialogue around a specific issue. FGDs are ideal for capturing collective experiences, understanding community dynamics, and surfacing group-level perceptions.⁷⁰

One FGD was conducted in each village, with efforts made to hold parallel sessions for women, men, and youth where feasible. Discussions were facilitated in Sindhi and Thari, using oral and written note-taking, and were supported by female facilitators to ensure gender-sensitive engagement. Each FGD, lasting 45 minutes to an hour, brought together a diverse group of participants varying in gender, age, and occupation, including farmers, laborers, housewives, students, and unemployed youth. The duration was determined by the number of individuals in the group.

In addition to FGDs, ten key informant interviews (KIIs) were held with schoolteachers, village elders, community-based organization leaders, and informal authority figures. The team surveyed the village surroundings for public sites to ascertain the presence or absence of visible GRM infrastructure, including complaint boxes, public notices, and community meeting areas. Informal community mapping exercises were carried out to understand spatial relationships between community resources and corporate/government touchpoints.

4.4. Sample Profile and Data Collection

Fieldwork was conducted over two consecutive days in April 2025, with one day allocated per village. In total, 46 individuals directly participated: 24 through FGDs (12 per site), 10 as key informants, and 12 others engaged via informal conversations and observation. Both villages reflected high levels of social complexity, marked by religious diversity, multi-caste compositions, and gendered social roles. Population estimates place Khario Ghulam Shah between 8,000–9,000 and Thario Halepoto between 2,800–3,600 residents.

All field interactions were conducted in local languages, Sindhi, Urdu, and Thari, to ensure inclusivity and mutual understanding. Verbal informed consent was obtained from all participants.

For analysis, we encoded the data into key categories such as transparency, institutional responsiveness, gender exclusion, and environmental harm. Findings were cross-validated using direct quotes and contextual triangulation from field observations and interviews.

4.5. Drafting the GRM Model

The GRM model was drafted through a participatory and evidence-based process, combining international best practices with local realities of Tharparkar. We began by reviewing global grievance redress frameworks from multilateral institutions, lenders, and large-scale energy projects, identifying features that ensure accessibility, transparency, and accountability. This was followed by an in-depth analysis of existing GRMs in Thar's coal blocks, highlighting systemic gaps such as limited community outreach, lack of independent oversight, and weak enforcement mechanisms. Extensive field consultations were then conducted with local communities, civil society groups, district officials, and project operators to understand ground-level challenges and preferences.

70 https://www.swisstph.ch/fileadmin/user_upload/SwissTPH/Topics/Society_and_Health/Focus_Group_Discussion_Manual_van_Eeuwijk_Angehrn_Swiss_TPH_2017.pdf

This framework is designed to be practical, fair, and community-driven. The final model includes six components:

- 1. Multiple grievance submission channels**
- 2. Independent verification**
- 3. Urgency protocols for critical cases**
- 4. Public complaint tracking**
- 5. Escalation to financial institutions and regulators**
- 6. Transparency through open meetings and public reporting**

The feedback shaped core design principles—local language communication, gender inclusion, strict timelines, independent verification, and structured escalation pathways. The model was iteratively refined through stakeholder workshops to ensure it was both practical in implementation and responsive to community needs, resulting in a framework that blends global standards with locally driven solutions.

4.6. Validation Through Closed-Door Consultation

After field data was compiled and the draft GRM model developed, a closed-door consultation was organized to validate the findings and gather expert feedback. Participants included:

- **Government officials from the Energy Department, Environmental Protection Agency (SEPA), and Local Administration;**
- **Community representatives and activists from the Thar region;**
- **Members of non-governmental organizations (NGOs) working on environmental justice, governance, and community rights.**

The consultation served as a tripartite peer-review platform, enabling refinement of the GRM model through technical feedback, policy alignment, and local verification. Stakeholders assessed the draft framework's feasibility, cultural legitimacy, and operational structure. Suggestions from this forum were incorporated into the final design of the community-centric GRM and Policy Recommendations for coal-affected areas of Tharparkar.

Field Findings and Results

5.1. Awareness of Existing GRM Structures and Shortcomings

In Thar coal power plant Block I, no formal or visible GRM is in place. Residents reported that they had never seen any grievance system run by Shanghai Electric, its subsidiaries or the government institutions. Instead, people resort to informal ways to raise issues, which include: writing letters and applications to elected officials, organizing press conferences, or staging peaceful protests. One such protest reportedly lasted 280 days^{71 72}, a striking sign of local frustration. Yet no official channel exists to register complaints or provide responses. The only corporate outreach anyone could recall was the distribution of Ramadan ration packages, which also excluded minority groups like Hindus.

In Block II, a formal GRM has been set up by Engro Powergen Thar Limited. This includes a Public Complaints Unit (PCU) and designated Grievance Focal Points (GFPs). According to ThalNova's Environmental and Social Impact Assessment (ESIA).⁷³ The PCU is meant to act as a direct link between the community and the company, responsible for receiving and resolving complaints. GFPs, ideally a mix of male and female community members are expected to support villagers in navigating the process. There is no criteria mentioned for the selection or election of GFPs. Company representatives also conduct weekly field visits using Thar Foundation vehicles, and complaint boxes have been installed at central spots like the Khushal Thar Office.

But in reality, the system rarely works as intended. During focus group discussions in Thario Halepoto, community members shared that while the GRM structure exists, its outreach is limited. Company interactions often take the form of quarterly or sometimes monthly, closed-door meetings with a few elderly male representatives chosen by the company, typically those seen as aligned with corporate interests. Most villagers remain unaware of the process, its outcomes, or how to raise their concerns, leaving them excluded and unheard.

Across both coal power plant blocks, people often approach local political or administrative figures (Minister of Provincial Assembly, Minister of National Assembly, tehsildars, or assistant commissioners) for help. But according to both communities, these officials usually ignore them, fail to provide updates, or worse, retaliate. Even protestors from communities residing near Block I were labelled anti-development and even faced FIRs. Whereas those residing near Block II told that officials are seen siding with the company in private while offering vague promises in public.

5.2. Accessibility of Locals Around GRMs

In Block II, awareness about the existing GRM mechanisms is present but it is shallow and inequitably disseminated. According to residents of Thario Halepoto, announcements are made using mosque loudspeakers, and village meetings. However, these communication efforts mostly reach the older male representatives of Village Organizations (VOs), who are often seen as biased and aligned with the company. Consequently, the broader community (including youth and women) is excluded from meaningful participation. The FGD participants emphasized that Engro's VOs do not reflect the will of the people, and many villagers are unaware of meeting agendas or grievance outcomes due to this narrow channel of communication.

In Block I, the entire concept of a GRM is absent in public awareness. According to the residents of Khario Ghulam Shah, the company has never communicated the existence of any complaint system. There were no follow-ups, no community engagement meetings, and no transparency regarding any complaint or grievance structures. Villagers mostly rely on word-of-mouth and personal connections to report issues to the government. Unfortunately, these complaints are rarely acknowledged or addressed by officials.

⁷¹ <https://acjce.com/?event=tharis-take-part-in-protest-sit-in-against-atrocities-of-coal-power-plant-companies>

⁷² <https://www.youtube.com/watch?v=LfwRsOYri2k>

⁷³ <https://urckarachi.org/wp-content/uploads/2020/07/EIA-report-vol-1-330MW-Thar-Energy-HubPower-Company-2.compressed.pdf>

5.3. Key Grievances Recorded from FGDs

5.3.1. Environmental Grievances

Participants in both Khario Ghulam Shah (Block I) and Thario Halepoto (Block II) expressed serious environmental concerns directly linked to the operations of nearby coal power plants and mining activities. The most recent grievance was water contamination due to mining waste, with underground water rendered unsafe and undrinkable due to alarmingly high levels of Total Dissolved Solids (800–1000 TDS)⁷⁴. The community is facing a striking drop in groundwater levels due to high quantities of groundwater used for extraction, which has exacerbated water scarcity in an already arid region.

The environmental degradation was further compounded by air and noise pollution, particularly from blasting and coal dust emissions, which were linked to increased cases of respiratory illnesses in both children and adults. These impacts include skin diseases, cardiovascular ailments, illnesses related to the brain, blood and lungs and different cancers. The emission of carbon dioxide during power generation changes the air quality when it mixes particulate matter (PM 2.5) and leads to increased asthma attacks and other respiratory diseases. The ash residue of coal combustion contains toxic elements such as mercury, lead, sulfur and over a dozen heavy metals which can cause birth defects, loss of livestock, degradation of biodiversity and soil erosion.⁷⁵

In Block II, the presence of toxic smoke, acid rain, and lightning arresters near the plant heightened both health and safety risks. Pastoral livelihoods were also severely impacted; grazing lands were contaminated, and livestock reportedly died after consuming toxic grass, likely due to elevated nitrogen levels and polluted water, resulting in reduced agricultural productivity and heightened food insecurity. Vegetation loss is widespread, with formerly green areas now barren, leaving communities to confront the twin threats of environmental collapse and economic marginalization.

5.3.2. Socio-Economic Grievances

A consistent theme across both FGDs was the grievance surrounding uncompensated or under-compensated land acquisition. Generations of families in Thar have been denied rightful compensation, with lands owned by their grandparents still awaiting redress for acquisition linked to coal development projects. In Block II, communities lamented the exploitative nature of the acquisition process, with many never receiving the promised payments or facing ambiguous ownership documentation that blocked disbursement. Similarly, in Block I, residents stated that although their lands were directly affected by mining and construction, they were told they were “not on the map” and thus ineligible for compensation.

People showed discontent and were mostly unhappy with unfulfilled promises of job opportunities offered by the project organizers. Despite repeated promises of local hiring, both communities reported that jobs were handed out based on political favoritism or personal connections, with little regard for local needs. This has led to rising unemployment, frustration, and feelings of exclusion among the youth and working-age population.

Additional grievances included the loss of traditional livelihoods, such as those dependent on agriculture, livestock, or other climate-sensitive income sources. The influx of outsiders was identified as a source of social tension, resource conflict, gender-based risks, and crime. Furthermore, constant noise from machinery and light from power plants were reported to disrupt sleep, disturb animals, and interfere with rural routines, contributing to negative impacts on health and mental well-being. This situation has also led to forced migration for employment to other cities, resulting in significant demographic shifts (age-wise) at the site, with a greater proportion of elderly or aged individuals.

Essential services such as education and healthcare have also deteriorated or failed to develop. In Block II, community members criticized the incomplete construction of the Thar Foundation Hospital and the presence of un-

⁷⁴ <https://www.priedpk.org/wp-content/uploads/2024/08/Thars-hydrology.pdf>

⁷⁵ <https://www.google.com/url?q=https://www.priedpk.org/wp-content/uploads/2024/06/Health-Hazards-R07.pdf&sa=D&source=docs&ust=1752561269567388&usg=AOvVaw26V-IyDIQGj8WVUfLQ2L93>

derpaid and incompetent teachers in primary schools. The gap between Community Social Responsibility (CSR) promises and ground realities reflects a deeper governance failure to protect community welfare amidst large-scale industrialization.

The coal power generation company's preference for hiring higher-waged, non-local workers due to lower regional literacy creates human resource competition. This deprives locals of opportunities and forces them to share resources like food and water with migrants, leading to increased regional stress and conflict.

5.3.3. Community Perceptions

Most people deeply distrust GRMs. In Block II, even though a formal GRM is officially in place, people perceive it as symbolic and not truly effective. Meetings between Engro Powergen Thar Limited officials and Village Organization elders occur behind closed doors, without any transparency or public involvement. Complaint boxes, such as the one placed at the Khushal Thar Office, are viewed as superficial, with no tracking, no response, and no accountability.

In Block I, the situation is even worse. The community is completely unaware of any existing GRM, and all interactions with the company have been either absent or limited to one-off charity gestures for followers of a specific religion. The prevailing sentiment is that communities are excluded by design, and that even peaceful engagement results in retaliation and marginalization.

There is a growing consensus across both blocks that only a government-regulated, multi-stakeholder GRM platform, incorporating audits, deadlines, and community-elected representatives, can restore faith and ensure justice. As one resident from Block I powerfully stated, "We are labeled as anti-development just for asking what was promised". This quote encapsulates the sense of betrayal and institutional neglect felt by those most affected by Thar's "development".

5.4. Community Proposals for Effective GRM Model

This section details the GRM structural issues highlighted during our FGD and effective management of community proposals that may emerge within the project's operational framework. It outlines a systematic approach designed to ensure transparency, inclusivity, and efficiency in responding to community input and maintaining the integrity of the project's infrastructure.

5.4.1. Village Organization (VO) & Volunteer VO (VVO)

While companies operating in Thar Coal Blocks promote top-down Village Organizations (VOs) as intermediaries between communities and project stakeholders, local residents across both Khario Ghulam Shah (Block I) and Thario Halepoto (Block II) find them unrepresentative and biased. In Block II, VOs are dominated by male elders aligned with companies like Engro Powergen Thar Limited, lacking community endorsement and operating without transparency or accountability.

Communities instead advocate for Village Volunteer Organizations (VVOs), being inclusive, community-led, and transparent grassroots bodies. VVOs would be community-elected with balanced representation (youth, women, elders) and tasked with monitoring grievance redress mechanisms (GRM), publishing minutes, and communicating outcomes.

FGD participants favor a tripartite GRM model where VVOs, government, and company representatives address grievances transparently. Communities also want technology integration (mobile apps for complaints, digital dashboards for tracking, community-based audit systems). The community views VOs as corporate-serving, and VVOs as the legitimate path to inclusive governance, local empowerment, and trust-building.

5.4.2. Systemic Suppression

In Khario Ghulam Shah (Block I), peaceful protests against coal power were met with severe state-backed suppression, including FIRs, arrests, and terrorism charges. Despite non-violent demands for fair compensation and environmental accountability, protesters were labeled “anti-development,” stifling dissent and instilling fear, undermining democratic expression. The community demanded implementation of independent investigations and accountability for protest suppression, ensuring the right to peaceful assembly and fair compensation. Facilitate community dialogue, support detainees, promote public awareness, and reform relevant laws.

5.4.3. Broken Promises

In Thario Halepoto (Block II), community members expressed distrust due to unfulfilled political promises, particularly the Chief Minister of Sindh’s 2021 pledge of land acquisition and royalty payments for ancestral land use. Despite public commitments, no funds materialized, deepening distrust toward both the provincial government and corporate actors, seen as exploiting local resources without delivering benefits. The community sought a fair share of mining royalties, energy revenues, and compensation for their ancestral lands, including protecting sacred sites and establishing a community development fund.

5.4.4. Cultural Exclusion of Women

Women are excluded from formal grievance mechanisms in both blocks, despite their active participation in protests and exposure to mining impacts. In Block I, women faced violence for protesting and are now deterred from formal complaints. In Block II, no women have filed official complaints due to cultural norms and institutional neglect, limiting them to informal protest roles. Addressing these challenges is crucial for the election of female representatives and the establishment of secure environments for reporting gender-based violence, as well as for the implementation of female employment and income generation initiatives.

5.4.5. Youth Advocacy

Younger members of both communities have emerged as key voices demanding reform, calling for digital inclusion, training programs, and leadership roles within GRM structures. Youth participants in Thario Halepoto argued for the use of mobile applications, real-time dashboards, and transparent complaint tracking systems to replace opaque, paper-based or informal processes. They also expressed a desire to be involved in decision-making, particularly because they possess the technical skills and awareness needed to challenge exploitative practices. Their inclusion is viewed by the community as essential to creating a functional, modern, and accountable redress system.

These gaps necessitate a functioning, inclusive redress mechanism that bridges the trust and connection between coal project operators and affected communities. The creation of a people-approved, culturally embedded GRM is important and will reflect the realities, identities, and needs of the Thari population. A functional and inclusive redress mechanism is crucial to bridging the trust and connection between coal project operators and affected communities. Establishing a culturally embedded, people-approved Grievance Redress Mechanism (GRM) is crucial. This mechanism should accurately reflect the affected community’s realities, identities, and needs. Furthermore, a capacity building program for local youth will enhance their employment prospects within the coal power generation company or help them explore alternative income-generating opportunities.

5.4.6. Comparative Analysis of GRM Experiences

Based on the findings discussed above, we have compared the GRM experience of communities of Block I and Block II. Table 3.3 summarizes key aspects like reporting methods, transparency, accessibility, and follow-up across the two blocks, showing their differences and similarities in handling problems.

Table 5.1: Comparative GRM Performance: Block I vs Block II

Aspect	Block I (Khario Ghulam Shah)	Block II (Thario Halepoto)
Ways to Report	Protests, political letters	Complaint box, visits from VO reps
Transparency	None; verbal complaints disappear	Meetings held privately, no disclosures
Accessibility	No access for women/youth	Costly and difficult; women excluded
Follow-up Mechanism	None	Promises made, but never fulfilled
Community Involvement	Absent	Selective and biased towards agreeable elders

5.5. Comparison of the GRM in Reported EIAs with Field Findings

The findings from community fieldwork stand in stark contrast to the Grievance Redress Mechanisms (GRMs) outlined in the EIA documents for Thar Block I and Block II.

- In Khario Ghulam Shah (Block I), community members reported the complete absence of any formal grievance platform, as Shanghai Electric has mentioned that the project owners will develop a GRM. Due to this, grievances related to land disputes, environmental degradation, and health impacts from coal-based operations were either ignored or redirected through informal and opaque local power structures, offering no credible channel for resolution or accountability.
- In Thario Halepoto (Block II), residents acknowledged the existence of a company-operated liaison office, as mentioned in the EIA. However, they emphasized that grievance handling remains ad hoc, inconsistent, and lacking transparency. Participants noted that complaints are rarely followed up, and no records of resolution are made available to the community. Women and youth, in particular, reported no access to any complaint mechanism, also there are no female PCU, they also highlighted exclusion from decision-making processes.

This **empirical evidence gathered** through FGDs, KIs, and direct community engagement confirms a clear gap between the commitments stated in the EIA documents and the on-ground reality. Despite the formal provisions for GRMs, the systems either do not exist in practice or operate in ways that are functionally ineffective, exclusionary, and unaccountable.

Proposed GRM Model for Thar Coal Blocks

The lack of effective GRMs has eroded the trust between coal project developers and Thari communities, causing unaddressed grievances, resentment, and social unrest. A locally legitimate, community-approved GRM, reflecting Tharparkar's culture and realities, is essential. This GRM must be rooted in indigenous values, traditional dispute resolution, and community participation, while meeting international standards of fairness, transparency, and accountability. It must be accessible in Thari and Sindhi, endorsed by local stakeholders, and actively responsive to complaints to gain credibility.

A transparent and independent GRM is a vital social safeguard for conflict reduction, rights protection, and ensuring Thar's coal development doesn't marginalize its people. We propose a multi-tiered, community centric GRM that offers various grievance submission channels and ensures timely resolution. Independent oversight by elected community representatives is crucial, ensuring the mechanism remains free of political or corporate influence, focusing on restorative development over extractive exploitation.

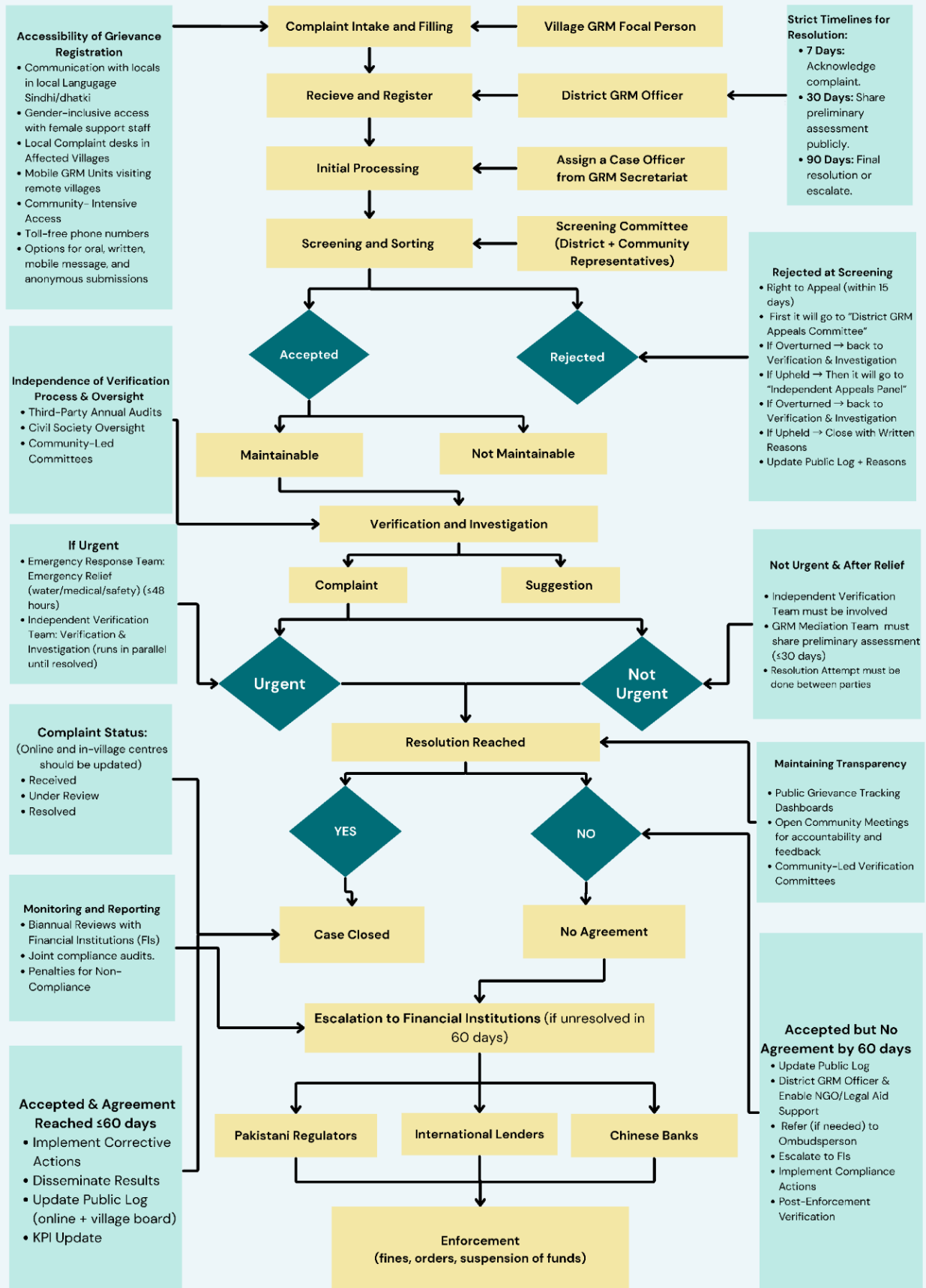
The model is structured around four fundamental principles, developed through extensive field and expert consultations and incorporating both local customs and global best practices:

1. **Accessibility:** This model welcomes everyone and offers various submission methods (verbal, written, digital) in local languages, and can be converted to English after the complaint is being processed.
2. **Inclusion:** It ensures women, youth, and marginalized communities actively participate in both lodging and resolving grievances.
3. **Independence:** Community organizations and neutral parties, including respected community figures, oversee and monitor the model.
4. **Responsiveness:** The model is committed to handling grievances within specific timeframes, with transparency and accountability.

Unlike existing GRM structures in Blocks I and II which are either ad hoc or lack transparency, this model prioritizes community ownership over corporate control, inclusivity across gender and age groups, multilingual access, and independent monitoring.

This proposed GRM is a reformative policy tool and represents a moral and political shift toward participatory governance and environmental justice. It bridges the gap between Pakistan's national energy ambitions and the need for equitable, rights-based local development. By embedding justice and accountability at the grassroots level, it transforms the trajectory of coal development in Thar from exclusion to empowerment.

A Model Grievance Redress Mechanism (GRM) for Coal Field Blocks in Tharparkar, Sindh



The presented model outlines a community-centric Grievance Redress Mechanism (GRM) designed specifically for coal field projects in Tharparkar, Sindh. It focuses on making the process accessible, transparent, and independent, ensuring that affected communities can raise concerns effectively. Accessibility is ensured through communication in local languages (Sindhi/Urdu), gender-inclusive support with female staff, toll-free numbers, anonymous submissions, mobile GRM units for remote villages, and community outreach desks in affected areas.

The process begins with the intake and registration of complaints at the village or district level, followed by initial processing and screening by a committee comprising district and community representatives. Complaints may be accepted or rejected at this stage. If rejected, complainants have the right to appeal within 15 days, first to the District GRM Appeals Committee and, if needed, to an Independent Appeals Panel. Accepted complaints are further classified as maintainable and then move into verification and investigation. Urgent cases, such as those involving health, safety, or access to water, trigger an emergency response within 48 hours while verification continues in parallel.

Following verification, complaints are categorized as urgent or non-urgent. Non-urgent cases involve mediation between parties, with a preliminary assessment shared within 30 days. If resolution is reached, the case is closed, corrective actions are implemented, and results are publicly shared. If no agreement is reached within 60 days, the matter is escalated to financial institutions and may subsequently be taken up by Pakistani regulators, international lenders, or Chinese banks, with enforcement measures such as fines, orders, or suspension of funds.

To maintain independence and transparency, the model incorporates third-party audits, civil society oversight, community-led committees, public grievance tracking dashboards, and open community meetings for accountability. Strict timelines are built into every stage: 7 days to acknowledge a complaint, 30 days to share preliminary findings, and 90 days for final resolution or escalation. This structured, step-by-step approach ensures that grievances are addressed promptly, fairly, and with the active participation of local communities.

6.1. Community-Centric Approach:

The proposed model is built on the foundational principle of community ownership. Recognizing the historical exclusion of local populations, particularly women, religious minorities, and youth, from formal redressal processes, this model prioritizes localized access, language inclusion, and social trust. It establishes complaint intake mechanisms directly within affected villages, staffed by gender-inclusive support teams and operated in local dialects such as Sindhi and Dhatki. Community members can register complaints through oral narration, written forms, text messages, or anonymous submissions. Mobile GRM units extend access to remote areas, while toll-free numbers and public drop-boxes provide additional layers of accessibility. This intensive, village-level integration ensures that redressal is not just a procedural formality, but a living, breathing process embedded in the community's daily life and social norms.

6.2. Institutional Design and Integration of Community Findings

The institutional structure of the proposed GRM draws from global grievance redress frameworks, such as the IFC Performance Standards, UN Guiding Principles on Business and Human Rights, and BRI environmental guidelines, while adapting them to the specific socio-political context of Thar. The model follows a structured workflow:

Complaint Intake → Registration → Screening → Verification → Resolution.

At each stage, transparency is maintained through community-led monitoring, public dashboards, and open village meetings. This reflects key theoretical pillars of procedural justice; fairness, transparency, accessibility, and accountability.

Importantly, this model is not top-down. It integrates direct insights from Focus Group Discussions (FGDs) and Key Informant Interviews (KIIs) conducted by Khario Ghulam Shah and Thario Halepoto. In response, the model incorporates Tripartite Committees that verify and investigate complaints, disseminate outcomes, and update

a public grievance log. As a result, the model not only resolves disputes but builds institutional trust, empowers marginalized groups, and promotes social accountability.

6.3. Escalation, Oversight, and Enforcement

If a grievance remains unresolved after the 60-day resolution period, the model activates a structured escalation process. Unresolved cases are automatically forwarded to higher-level oversight bodies and financial institutions. These include Pakistani regulators such as SEPA and NEPRA, Chinese banks engaged under Belt and Road Initiative (BRI) protocols, and international lenders like the Asian Development Bank (ADB) and the World Bank, depending on project ownership and financing. Notification occurs through joint compliance portals, requiring these institutions to intervene either by applying funding-linked conditions, mandating corrective actions, or initiating independent arbitration.

The model also mandates biannual review meetings between regulators and financial institutions to conduct joint compliance audits. These audits may trigger penalties for non-compliance, such as fines, suspension of funds, or enforcement orders. This structured oversight reinforces accountability by linking grievance outcomes directly to financial and regulatory consequences.

This third-tier escalation reflects global best practices in grievance governance, where financial leverage and reputational accountability are used to enforce redress and transparency. By embedding cross-institutional pathways, the mechanism ensures that grievances cannot be indefinitely stalled at the local level, while also empowering communities with meaningful leverage despite unequal power relations.

In effect, the model creates a closed-loop system in which every grievance is acknowledged, tracked, and reported—whether resolved locally or escalated to external institutions. This ensures that community concerns in Tharparkar are not only heard but also enforced through a transparent and community-centric accountability framework.

Aligning GRMs in Thar with Chinese and International Standards

Many of Thar's coal power plants are financed and operated by Chinese entities. As such, their operational GRMs must not only address local expectations but also align with the rigorous social and environmental standards embedded in China's overseas investment. Chinese regulatory frameworks that are used by its leading companies and major financiers are widely recognized for their emphasis on stakeholder engagement, transparency, and sustainability.

To ensure consistency with the principles of the BRI and CPEC, we recommend that all CPEC-linked coal and energy infrastructure projects formally integrate relevant Chinese GRM policies into their operational frameworks. Doing so will enhance accountability, foster long-term community trust, and demonstrate alignment with both investor standards and international norms. These standards should be harmonized with Pakistan's legal framework and global safeguards to build a grievance system that is culturally sensitive, locally legitimate, and globally compliant.

Although CPEC does not yet have a centralized public GRM framework, Chinese-financed projects are expected to adhere to broader BRI policies that emphasize participatory, transparent, and effective grievance resolution systems. Key policies supporting alignment include the BRI Green Development Guidance (2021)⁷⁶, which was issued by the Belt and Road Initiative Green Development Coalition (BRIGC). This guidance promotes environmental and social impact assessments (ESIAs) that meet international standards, the establishment of accessible grievance channels, and meaningful stakeholder engagement.

The Guidelines for Environmental Protection in Foreign Investment and Cooperation (2013), issued jointly by China's Ministry of Commerce (MOFCOM) and Ministry of Environmental Protection (MEP), stipulate that Chinese enterprises investing abroad, whether as financiers or under legally binding contracts with the host country, must comply with the host country's environmental laws, adopt international best practices where local standards are inadequate, and establish mechanisms for public consultation and grievance handling.⁷⁷

Integrating these policies as international standards in Chinese-funded or operated projects is crucial. This integration will reimagine existing grievance redressal frameworks, particularly for energy infrastructure projects. The goal is to cultivate a legally enforceable model for environmental justice, accountability, and long-term sustainability for affected communities. This refined framework will protect local populations' rights and well-being while enhancing the legitimacy and ethical standing of energy developments globally.

By grounding the framework in local voices, aligning it with Chinese and global standards, and embedding escalation pathways to regulatory and financial bodies, the model serves as both a conflict prevention tool and a social justice instrument.

76 http://en.brigc.net/Reports/Report_Download/2020/202012/P020210202120471013629.pdf

77 https://english.mee.gov.cn/News_service/news_release/201303/t20130305_248785.shtml#:~:text=The%20Environmental%20Guidelines%20provide%20guidance,and%20building%20a%20harmonious%20world.

Policy Recommendations

A robust, people-approved GRM is not just a compliance tool, it is a foundation for inclusive development and social peace. These recommendations aim to institutionalize grievance redress as a participatory, accountable, and dynamic process that respects cultural identity, promotes justice, and fosters trust between communities, state actors, and investors. With climate stress, displacement, and development pressures converging in Thar, a functional GRM can serve as the cornerstone of environmental and social resilience.

1. Legal Reforms and Enforcement

GRMs need a solid legal foundation. This means updating outdated laws like the Land Acquisition Act of 1894 and requiring that all energy and infrastructure projects, especially those under CPEC, include enforceable, rights-based GRM provisions. EIAs should also be revised to include clear requirements for grievance systems that are operational, budgeted, and gender-sensitive, with proper oversight by SEPA, NEPRA, and relevant provincial authorities.

2. Independent Oversight and Monitoring

An independent Federal Grievance Oversight Authority should be established under the Ombudsman's office to monitor how grievance systems function across major infrastructure projects. At the provincial level, agencies like SEPA must be empowered to carry out regular audits, enforce standards, and publish public reports, especially in ecologically and socially sensitive areas like Thar.

3. Community Participation and Inclusion

For GRMs to work, communities must have a seat at the table. Tripartite Committees, with representatives from government, project developers, and affected communities, should co-design and manage the grievance process. These committees must be inclusive of women and youth. Local-level Village Volunteer Organizations (VVOs) should also be formed or strengthened to ensure local ownership. All communication materials should be available in local languages (Sindhi and Thari), and safe, trusted channels for women to report grievances must be guaranteed.

4. Digital Access and Timely Redress

Technology can make grievance systems more transparent and responsive. Mobile apps and digital dashboards should allow real-time, anonymous complaint submission and tracking. Standard timelines must be enforced, such as acknowledging complaints within 48 hours and resolving them within 15–30 days. Outcomes should be publicly shared to build credibility and trust.

5. Align with International and Chinese Standards

Energy projects under CPEC must align with Chinese ESG frameworks like the BRI Green Development Guidelines, the China Development Bank's Green Investment Principles, and MOFCOM protocols. Independent assessments by NGOs, academics, or ombudspersons should evaluate how well grievance systems are working, while also ensuring alignment with global best practices such as those of the IFC and ADB.

6. Dedicated Community Grievance Fund

Every large-scale project should allocate a dedicated GRM fund as part of its financing package. This fund should be used solely for handling complaints, facilitating dispute resolution, and providing post-resolution support. It must be independently managed, drawing inspiration from models used in IFC- and World Bank-supported projects.

7. Independent Mediation

To ensure fairness, projects should appoint an independent mediator or ombudsperson, who is neutral and unaffiliated with either the government or the company. This role should follow international mediation standards and be trusted by the local community.

8. Structured Dialogue Between Companies and Communities

Regular meetings between companies and affected communities should be institutionalized, not just for crisis response but to proactively address concerns. These meetings must be documented, and summaries should be publicly available.

9. Independent GRM Monitoring Council

A national or provincial-level GRM Monitoring Council should be created, made up of civil society representatives, legal professionals, academic experts, and community leaders. This council should monitor grievance trends, protect whistleblowers and complainants from retaliation, and publish monthly or quarterly performance reports.

10. Build Community Capacity for Long-Term Impact

While Chinese companies have launched several CSR programs, many have not been sustained due to a lack of local capacity. GRM policies should include capacity-building measures, like technical training and institutional support, to empower communities to manage and sustain development projects over the long term.

11. Confidentiality and Transparency

Confidentiality is critical, especially for sensitive issues like gender-based violence, corruption, or worker mistreatment. At the same time, GRMs should release anonymized, aggregated data about complaints and resolutions to build public confidence and demonstrate accountability.

12. Efficient GRMs in a Weak Governance Context

Even where government institutions are weak, GRMs can still work, if they're designed with strong community oversight and third-party facilitation. The government's role should be to enable, monitor, and enforce compliance, not to directly control the grievance process.

Annexure

Questionnaire for Understanding an Effective Grievance Redressal Mechanism for the People of Thar

SECTION A: Village Profile Questionnaire

گاؤں کی پروفائل کا سوالنامہ: A سیکشن
گوت جي پروفائل بابت سوالنامو: A سیکشن

1. Basic Information

بنیادی معلومات
۱. بنیادی معلومات

- Village Name:

گاؤں کا نام:
گوت جو نالو:

- Union Council/Tehsil/District:

یونین کونسل/تحصیل/ضلع:
یونین کاؤنسل/تعلقو/ضلعو:

2. Location and Proximity

مقام اور قربت
۲. مقام ۽ ویجھو هجڻ

- Distance from nearest power project (km):

قريبی پاور پراجیکٹ سے فاصلہ (کلومیٹر):
(ویجھو پاور پراجیکٹ کان مفاصلو) (کلو میٹر)

- Name and Type of nearest power project:

قريبی پاور پراجیکٹ کا نام اور قسم:
ویجھو پاور پراجیکٹ جو نالو ۽ قسم

- Road access and distance from nearest main road or highway (km):

قريبي مرڪزي سڙڪ يا شاھپراھ ۽ فاصلو اور رسائي (ڪلوميٽر):
ويجهو مين روڊ يا هاءِ وي کان مفاصلو ۽ رسائي (ڪلو ميٽر):

☐ پڪي سڙڪ ☐ ڪچي سڙڪ ☐ ڪوئي براھ راست رسائي نھي
☐ پڪي سڙڪ ☐ ڪجهي سڙڪ ☐ سڌي رستي جي سهولت ناھي

- Total population of the village:

گاؤن کي ڪل آبادي:
: ڳوٺ جي ڪل آبادي

3. Age-wise and Gender-Wise Population Distribution

عمر جو گروپ	فردن جو تعداد
سال 0 – 17	
سال 18 – 35	
سال 36 – 60	
سال 60+	

عمر اور جنس ڪے لحاظ ۽ آبادي کي تقسيم
عمر ۽ جنس جي حساب سان آبادي جي ورڇ

3.1. Profession-wise Distribution

پيشه ڪے لحاظ ۽ تقسيم
پيشن جي حساب سان ورڇ

فردن جو تعداد	پيشو
	زميندار/ڪسان
	مزدور
	سرڪاري ملازم
	نجي ادارن جا ملازم
	شاگرد
	گهر واريون عورتون
	بيروزگار
	(ٻيا) تفصيل ڏيو

3.2. Gender Composition of Village Population:

گاؤن کي آبادي کي جنس کي ترتيب:
گون جي آبادي جي جنس جو جوڙجڪ

Male: _____%	مرد: _____% مرد: _____%
Female: _____%	عورت: _____% عورت: _____%
Other: _____%	ديگر: _____% ٻيو: _____%

4. Religious Composition

مذهبي ترتيب
مذهبي جوڙجڪ

Islam (Sunni/Shia)	اسلام (سني/شيعة) اسلام (سني/شيعة)
Hinduism	هندومت هندومت
Christianity	عيسائيت عيسائيت
Others (specify):	ديگر (واضح ڪريو): ٻيا (واضح ڪريو):

5. Caste Composition

ذات کا ترکیب
ذات جوڑجک

Please list main castes or biradaris in the village and their estimated proportion:

براہ کرم گاؤں کی اہم ذاتوں یا برادریوں کی فہرست بنائیں اور ان کا تخمینی تناسب بتائیں:
مہربانی کریں کہ ذاتوں یا برادریوں کی فہرست دیوئے انھن جو تخمینو تناسب بیان کیو

6. Land-Holding Composition

زمین کے مالکانہ حقوق کی ترکیب
زمین جا مالک حقن جو جوڑجک

Land Ownership Type	زمین کے مالکانہ حقوق کی قسم زمین جي مالڪي جو قسم
Percentage of Households	گھروں کا فیصد گھرن جو سیکڑو
Government-owned land	حکومتی ملکیتی زمین حکومتي ملکيت واري زمین
Privately-owned land	نجی ملکیتی زمین ذاتی ملکيت واري زمین
Community land	کمیونٹی کی زمین کمیونتي جي زمین
No land ownership	زمین کی ملکیت نہیں زمین جو مالکائو ناھي

7. Infrastructure and Services

انفراسٹرکچر اور خدمات
انفراسٹرکچر ۽ خدمتون

Number of educational institutions (schools, colleges, madrasas):	تعليمي اداروں کی تعداد (اسکول، کالج، مدارس): تعليمي ادارن جو تعداد (اسکول، کاليج، مدارس):
Primary schools: _____	پرائمري اسکول: _____ پرائمري اسکول: _____
Middle/High schools: _____	مڈل/ہائی اسکول: _____ مڈل/ہاء اسکول: _____
Colleges: _____	کالج: _____ کاليج: _____
Madrasas: _____	مدارس: _____ مدارس: _____

Number of health facilities in the village:

گاؤں میں صحت کی سہولتوں کی تعداد:
: گوت ۾ صحت جون سہولتون

Basic Health Unit (BHU): _____	بنیادی صحت یونٹ (BHU): _____ بنیادی صحت یونٹ (BHU): _____
Private clinics: _____	نجی کلینک: _____ ذاتی کلینک: _____
Traditional healers/hakeems: _____	روایتی معالج / حکیم: _____ رواجی علاج کندز / حکیم: _____

SECTION B: Existing Complaint / Grievance Redressal Practices

موجودہ شکایات یا ازالے کے طریقہ کار: B سیکشن
موجودہ شکایتیں یا نیبرن جي طریقن بابت: B سیکشن

1. To assess whether a complaints or grievance redressal system (formal or informal) is in place for communicating and addressing concerns related to nearby coal power plants. Can you please describe the nature of any complaints you have regarding the coal power plants?

یہ جانچنے کے لیے کہ آیا قریبی کوئلے کے پاور پلانٹس سے متعلق شکایات کے اظہار اور ان کے ازالے کے لیے کوئی نظام (رسمی یا غیر رسمی) موجود ہے۔ کیا آپ براہ کرم پاور پلانٹس سے متعلق اپنی شکایات کی نوعیت بیان کر سکتے ہیں؟

هي ڏسن لاء ته پاڙيسري کوئلے جي پاور پلانٹن بابت شکایتیں جي اظہار ۽ نیبرن لاء کو نظام (رسمي یا غیر رسمي) موجود آهي؟
مهرباني ڪري ٻڌايو ته اوهان جون شکایتون ڪهڙي نوعیت جون آهن؟

2. Where do local people usually go to register or address these complaints or concerns? (e.g., local authorities, power company representatives, community leaders, etc.)

مقامی لوگ عام طور پر کہاں جاتے ہیں ان شکایات یا تحفظات کو درج کرانے یا ان کے ازالے کے لیے؟ (مثلاً: مقامی حکام، بجلی کمپنی کے نمائندے، برادری کے رہنما، وغیرہ)

مقامی ماٹھو عام طور تي اهي شکایتون يا خدشا کي رجسٹر کرائين ٿا يا حل کرائين ٿا؟ (مثال طور: مقامی اختيارين، پاور کمپني جا نمائندا، برادري جا اڳواڻ، وغيره)

3. Who do you think should be responsible for addressing your complaints about the power plants?

آپ کے خیال میں پاور پلانٹس سے متعلق شکایات کو حل کرنے کی ذمہ داری کس کی ہونی چاہیے؟

اوهان جي خيال ۾ پاور پلانٽن سان لاڳاپيل شکايتن جي نيڀرڻ جي ذميواري ڪنهن تي هئڻ گهرجي؟

4. Have you ever personally registered a complaint or raised a concern with any relevant stakeholders? If yes, please describe the nature of the complaint and what response you received.

کیا آپ نے کبھی خود سے کسی متعلقہ فریق کے ساتھ شکایت درج کروائی یا کوئی مسئلہ اٹھایا؟ اگر ہاں، تو شکایت کی نوعیت اور موصولہ جواب کی وضاحت کریں۔

چا اوهان ڪڏهن ذاتي طور ڪنهن لاڳاپيل ڌر سان شڪايت داخل ڪرائي آهي يا خدشو ظاهر ڪيو آهي؟ جيڪڏهن ها، ته شڪايت جي نوعيت ۽ مليل جواب بابت ٻڌايو.

5. Are you aware of any Grievance Redressal System (or complaints registration system) set up by the coal power plant management?

کیا آپ کو کوئلے کے پاور پلانٹس کی انتظامیہ کی طرف سے قائم کردہ کسی شکایات ازالہ نظام (یا شکایت درج کرنے کے نظام) کے بارے میں علم ہے؟
چا اوهان کي کوئلي جي پاور پلانٽ جي انتظاميا طرفان قائم ڪيل ڪنهن به شڪايت نيڀرڻ واري نظام جي خبر آهي؟

6. Are you aware of any announcements or advertisements that the coal power company has made about the presence of a GRM? If yes, what was the mode of that information (e.g., news, TV, mosque announcements)? Do you think the mode used was effective in dissemination?

کی موجودگی کے بارے میں دیا ہو؟ اگر ہاں، تو اس GRM کیا آپ کو ایسے کسی اعلان یا اشتہار کا علم ہے جو کوئلے کی بجلی کمپنی نے معلومات کا ذریعہ کیا تھا (خبریں، ٹی وی، مسجد کا اعلان)؟ کیا آپ کے خیال میں یہ طریقہ مؤثر تھا؟

بابت کیل کنہن اعلان یا اشتہار جو علم آہی؟ جیکڈھن ھا، تہ اھو اطلاع GRM چا اوھان کی کوئلے جي بجلی کمپنی طرفان ڈین جو طریقو کھڑو ھو (مثال طور خبروں، ٹی وی، مسجد جو اعلان)؟ چا اوھان سمجھو ٿا تہ اھو طریقو اثرائتو ھو؟

7. How often do the representatives of the coal power company visit the area to understand the community's concerns?

بجلی کمپنی کے نمائندے کتنی بار علاقے کا دورہ کرتے ہیں تاکہ برادری کے مسائل کو سمجھ سکیں؟

بجلی کمپنی جا نمائندا کیتري وقت کان بعد علائقي جو دورو کن ٿا تہ جيئن ماڻھن جا مسئلا سمجھي سگھن؟

8. Did you or any local person ever file a complaint using the system set up by the company or government? If yes, what was the nature of the complaint? Were those complaints ever addressed?

کیا آپ یا کسی مقامی فرد نے کبھی کمپنی یا حکومت کے بنائے گئے نظام کے ذریعے شکایت درج کروائی؟ اگر ہاں، تو شکایت کی نوعیت کیا تھی؟ کیا ان شکایات کا ازالہ ہوا؟

چا اوھان یا کنھن مقامی ماڻھو کڈھن کمپنی یا حکومت جي مقرر کیل نظام تحت شکایت داخل کئی؟ جیکڈھن ھا، تہ شکایت جي نوعیت کھڑي ھئی؟ چا انھن شکایتن جو نیرو ٿیو؟

9. How was your complaint handled?

آپ کی شکایت کو کیسے ہینڈل کیا گیا؟

اوھان جي شکایت کی کیئن حل کیو ویو؟

10. How much time did it take to communicate your complaint?

شڪايت ڪو پهچائڻ ۾ ڪتنا وقت لڳو؟

شڪايت پهچائڻ ۾ ڪيترو وقت لڳو؟

11. How much time did it take to address your complaint by the company?

ڪمپني ٺهه ڏيڻ لاءِ شڪايت ڪي ڪتنا وقت لڳو؟

ڪمپني شڪايت ٺهه ڏيڻ ۾ ڪيترو وقت لڳو؟

12. Is the process of filing a complaint intimidating? Please explain.

ڪيا شڪايت درج ڪرڻ ۾ ڪمپني ڪو عمل پريشان ڪن يا خوفناڪ ٿئي ٿو؟ وضاحت ڪريو.

ڪيا شڪايت ڏيڻ جو عمل ڏکي يا ڊڄارو لڳي ٿو؟ مهرباني ڪري وضاحت ڪريو.

13. Do you feel any hesitation about sharing your concerns with the relevant authorities?

ڪيا آپ متعلقہ حڪام ڪو ساٿہ اپنہ تحفظات ڪو اظهار ۾ ٻڌڻ ۾ محسوس ڪرڻ ۾ ٿئي ٿو؟

ڪيا اوهان ڪي خدشا ظاهر ڪرڻ ۾ ڪا هٻڪ محسوس ٿئي ٿي؟

14. Is the complaint system accessible to women in the area?

ڪيا اس شڪايت ڪو نظام خواتين ڪو لاءِ قابل رسائي ٿئي ٿو؟

ڪيا هي شڪايت ڪو نظام علائقي جي عورتن لاءِ پهچ ۾ آهي؟

15. How do you feel about the treatment of your complaint with the coal power plant company? Do they treat it fairly? Do the concerns of the community matter to them?

کوئلے کی بجلی کمپنی کی طرف سے شکایت کے ساتھ کیے جانے والے سلوک کے بارے میں آپ کا کیا خیال ہے؟ کیا وہ منصفانہ سلوک کرتے ہیں؟ کیا برادری کے مسائل ان کے لیے اہم ہیں؟

کوئلے جي بجلی کمپنی طرفان شکایت سان جيڪو ورتاء ڪيو ويو، ان بابت اوهان جو ڇا خيال آهي؟ ڇا هو منصفائي ورتاء ڪن ٿا؟ ڇا کين برادري جا خدشا اهم لڳن ٿا؟

SECTION-C: Community Perception of an Effective Grievance Redressal Mechanism (GRM)

کے بارے میں کمیونٹی کا تاثر (GRM) سیکشن-سی: مؤثر شکایتوں کے حل کے نظام

بابت کمیونٹی جو تاثرات (GRM) سیکشن-سی: مؤثر شکایتن جي حل ڪرڻ جو طريقو

1. What do you think an effective system for communicating complaints should look like?

آپ کے خیال میں شکایات کو پہنچانے کے لئے ایک مؤثر نظام کس طرح کا ہونا چاہئے؟

توهان جي خيال ۾ شڪايتن جو پهچائڻ لاءِ هڪ مؤثر نظام ڪهڙو هجڻ گهرجي؟

2. Should a local person from the community be appointed as a focal point by the power plant to receive complaints?

کیا پاور پلانٹ کو شکایات وصول کرنے کے لئے کمیونٹی سے کسی مقامی شخص کو فوکل پوائنٹ کے طور پر تعینات کرنا چاہئے؟

ڇا پاور پلانٽ کي شڪايتن وصول ڪرڻ لاءِ ڪميونٽي مان ڪنهن مقامي شخص کي فوڪل پوائنٽ طور مقرر ڪرڻ گهرجي؟

3. Should a local complaints office be set up by the company?

ڪيا ڪمپني ڪو مقامي شڪايت ڪا دفتر قائم ڪرنا چاهين؟

ڇا ڪمپني ڪي مقامي شڪايتن جو آفيس قائم ڪرڻ گهرجي؟

4. Should complaints be communicated through community elders or leaders?

ڪيا شڪايت ڪميونٽي ڪي بزرگوں يا رهنماؤن ڪي ذريع ٻهڻچائي جاني چاهين؟

ڇا شڪايتون ڪميونٽي جي بزرگن يا اڳواڻن جي ذريعي ٻهڻچائڻ گهرجي؟

5. Any other ideas?

ڪيا آپ ڪي پاس ڪوئي اور تجاويز پين؟

ڇا توهان وٽ ڪا ٻي تجويز آهي؟

6. Once the power plant company receives a complaint, what do you think an effective system for addressing the complaint should look like?

جب پاور پلانٽ ڪمپني ڪو شڪايت موصول ٻو جائ، تو آپ ڪي خيال مي اس شڪايت ڪو نمٽان ڪي لئ ايڪ مؤثر نظام ڪس طرح ڪا ٻونا چاهين؟

جڏهن پاور پلانٽ ڪمپني ڪي شڪايت ملي ٿي، ته توهان جي خيال ۾ ان شڪايت جو حل ڪرڻ لاءِ هڪ مؤثر نظام ڪهڙو هجڻ گهرجي؟

7. In your opinion, what should be the ideal time period to resolve a complaint after it has been submitted?

آپ ڪي راءِ مي، شڪايت جمع ڪروان ڪي بعد اس ڪو حل ڪرڻ ڪي لئ مثالي وقت ڪا عرصه ڪيا ٻونا چاهين؟

توهان جي راءِ ۾، شڪايت جمع ڪرڻ کان پوءِ ان ڪي حل ڪرڻ لاءِ مثالي وقت جو عرصو ڇا هجڻ گهرجي؟

☐ Immediately (1–2 days) ☐ Within 1 week ☐ Within 2 weeks ☐ Within 1 month ☐ Other

فوراً (۱-۲ دن) ☐ ایک ہفتے کے اندر ☐ دو ہفتوں کے اندر ☐ ایک مہینے کے اندر ☐ دیگر ☐

فوراً (۱-۲ مہینے) ☐ ہفتہ اندر ☐ دو ہفتوں کے اندر ☐ ایک مہینے کے اندر ☐ بیو ☐

Additional Notes / Comments from Respondent:

جواب دہندہ سے اضافی نوٹس / تبصرے

جواب دیندہ کان اضافی نوٹس / تبصرے



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