

January 16, 2025

TIP2025/0116/1A

Syed Murad Ali Shah
Chief Minister
CM House, Karachi

**Subject: TI Pakistan Recommendations on Enhancing Inclusiveness and Integrity in
Draft Provincial Inclusive Disaster Response Plan (PIDRP), Sindh**

Dear Sir,

Transparency International Pakistan appreciates the efforts of the Government of Sindh for formulating the *Provincial Inclusive Disaster Response Plan (PIDRP)*, Sindh. The initiative demonstrates commitment to safeguarding the province and its citizens from the increasing risks posed by climate change and natural disasters.

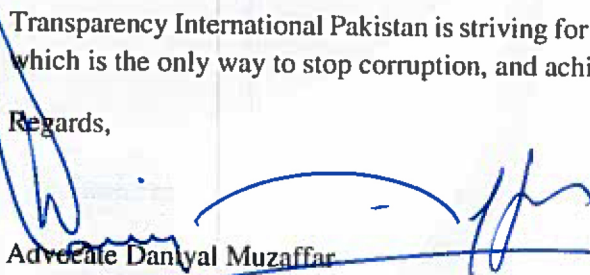
Sindh remains one of the most vulnerable provinces in Pakistan, with its unique geographical location exposing it to frequent floods and extreme weather events. The climate challenges are further exacerbated by the socioeconomic vulnerabilities of the population. It is crucial to ensure that disaster response and climate adaptation and mitigation measures address these challenges comprehensively to build resilience among communities.

In this regard, Transparency International Pakistan under its Climate Governance Integrity Programme is working at federal and provincial levels to ensure that climate policies and implementation plans are inclusive and include integrity measures which are necessary for an effective climate action. TI Pakistan had earlier shared recommendations with your office vide letter No. TIP2023/0616/1A dated 16th June 2023 (**Annex-A**). The honorable Chief Minister vide letter No. SO(VII)/CMS/CMD/513/2023, dated 5th July 2023 issued directives to the Secretary Environment Department, GoS for necessary action (**Annex-B**).

As that the Provincial Inclusive Disaster Reduction Plan is in the process of being drafted, TI Pakistan requests the Chief Minister Sindh to consider the recommendations which are necessary to incorporate community needs and civic voices in the draft plan and enhance transparency and accountability.

Transparency International Pakistan is striving for across-the-board application of Rule of Law, which is the only way to stop corruption, and achieve Zero tolerance against corruption.

Regards,



Advocate Daniyal Muzaffar
Trustee/Legal Advisor
Transparency International Pakistan



Copies forwarded for the information:

1. Chief Secretary, Government of Sindh, Karachi
2. Minister, Ministry of Climate Change, Karachi
3. Secretary, Environment Department, GoS, Karachi
4. Director General, Provincial Disaster Management Authority (PDMA), Karachi
5. Country Head, WHH Pakistan, Islamabad
6. Regional Director, CESVI Pakistan, Islamabad
7. DG ECHO, Islamabad



RECOMMENDATIONS FOR THE GOVERNMENT OF SINDH ON DRAFT PROVINCIAL INCLUSIVE DISASTER RESPONSE PLAN (PIDRP) TO ENHANCE INCLUSIVENESS AND INTEGRITY IN DISASTER MANAGEMENT

1. Draft Sindh Provincial Inclusive Disaster Response Plan (PIDRP) must establish District Disaster Management Committees (DDMCs) and Union Disaster Management Committees (UDMCs) at the district levels comprising of multi-stakeholders, local communities and civil society.
2. The guiding principles of the PIDRP must emphasize on disaster management bodies to ensure transparency in aid flows, allocation procurement and distribution process through a provincial centralized tracking system which may be established by Provincial Disaster Management Authority (PDMA). The provincial centralized tracking system must contain all information from relevant line departments working on disaster response, including information on projects, budget and expenditures, in an easily accessible format.
3. To improve disaster response, focal persons dedicated to disaster management should be appointed at the district level. This will enhance coordination and operational efficiency.
4. Develop a digital platform that integrates disaster updates, progress on disaster efforts and establish a toll-free hotline to address grievances and provide disaster-related information to the public.
5. Strengthen the capacity of communities, particularly women and vulnerable groups, by conducting training sessions on climate resilience strategies and disaster preparedness.
6. Implement and maintain advanced early warning systems to minimize the impact of natural disasters and ensure timely communication to at-risk communities.
7. Introduce citizen-friendly complaints and a grievance redress mechanism including corruption reporting channels to ensure that the concerns of communities are acknowledged and heeded. A Complaint Hotline shall be established PDMA and DDMA's where complaints can be reported to a toll-free telephone number, web, email and fax or by mail, and handled effectively.
8. Ensure strict compliance with Sindh Public Procurement Regulatory Authority Rules (SPPRA 2010) in emergency response and climate related projects and upload all contract information along with BOQ (Bill of Quantities) rates on the SPPRA Authority's website



9. Introduce and enforce whistleblower protection mechanisms to encourage the reporting of corruption or environmental violations during disaster relief and recovery efforts.
10. Develop and implement policies that prevent conflicts of interest in disaster finance and project implementation, ensuring transparency and integrity in decision-making processes.
11. Designate Public Information Officers (PIO) as per Section 7, for PDMA and all District Disaster Management Authorities (DDMAs) and proactively disclose information of all initiatives on the website of the PDMA as per Section 6 of Sindh Transparency and Right to Information Act 2016.
12. Enable community-led monitoring systems by institutionalizing mandatory social audits for all disaster-related projects, ensuring public participation in evaluating project outcomes and resource utilization. Annual audit reports must be made publicly available in Urdu to foster transparency and encourage public trust in disaster response efforts.
13. Strict action must be taken against the staff found involved in corrupt practices.

June 16, 2023

TIP2023/0616/1A

Syed Murad Ali Shah
Chief Minister
Government of Sindh
CM House,
Karachi

Subject: TI Pakistan Recommendations on Draft Sindh Climate Change Policy 2022 to Enhance Inclusiveness and Integrity in Provincial Climate Governance Framework

Dear Sir,

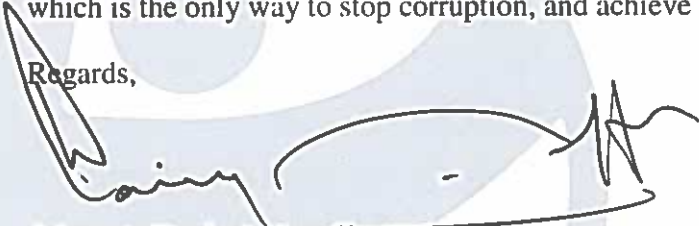
Pakistan lies at the center of climate crisis and is ranked as the 5th most vulnerable country to be impacted by Climate Change. Transparency International Pakistan is striving to make climate action transparent and inclusive by working in partnership with communities and civil society to ensure participative policy making processes and the highest standards of transparency.

In this regard, TI Pakistan in consultation with Civil Society Organizations have prepared recommendations on Draft Sindh Climate Change Policy 2022 for enhancing inclusiveness and Integrity in Sindh's Climate Governance Framework. The recommendations are enclosed for your reference.

Transparency International Pakistan requests the Chief Minister Sindh to consider the recommendations which are necessary to incorporate community needs and civic voices in the draft policy and enhance transparency and accountability.

Transparency International Pakistan is striving for across the board application of Rule of Law, which is the only way to stop corruption, and achieve Zero tolerance against corruption.

Regards,



Advocate Daniyal Muzaffar
Trustee/Legal Advisor
Transparency International Pakistan

Copies forwarded for the information:

1. Principal Secretary to PM, PM House, Islamabad
2. Federal Minister, Ministry of Climate Change, Islamabad
3. Federal Minister, Ministry of Planning, Development and Special Initiatives, Islamabad
4. Federal Minister, Finance and Revenue, Islamabad
5. Chief Secretary, Government of Sindh, Karachi

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Donations exempted from tax U/S 2 (36) (c) of I. Tax Ordinance 2001



6. Minister, Ministry of Climate Change, Karachi
7. Minister, Planning and Development Department, Karachi
8. Chairman, National Disaster Management Authority (NDMA), Islamabad
9. Director General, Provincial Disaster Management Authority (PDMA), Karachi
10. Director General, Pakistan Environmental Protection Agency, Islamabad
11. Director General, Sindh Environmental Protection Agency, Karachi
12. Chairman, Public Accounts Committee, National Assembly, Islamabad
13. Chairman, Public Accounts Committee, Sindh Assembly, Karachi
14. Chairman, National Accountability Bureau, Islamabad
15. Country Head, World Bank Group, Islamabad
16. Country Head, International Monetary Fund (IMF), Islamabad
17. Country Head, UNOCHA Pakistan, Islamabad
18. Country Head, UNFPA Pakistan, Islamabad
19. Country Head, UNICEF Pakistan, Islamabad
20. Country Head, UNODC Pakistan, Islamabad
21. Country Head, WHO Pakistan, Islamabad
22. Country Head, FAO Pakistan, Islamabad

RECOMMENDATIONS FOR THE GOVERNMENT OF SINDH ON DRAFT SINDH CLIMATE CHANGE POLICY 2022 TO ENHANCE INCLUSIVENESS AND INTEGRITY IN PROVINCIAL CLIMATE GOVERNANCE FRAMEWORK

1. Draft Sindh Climate Change Policy 2022 lacks stakeholder consultation and participation. Recommendations must be invited from Civil Society Organizations (CSOs) and Citizens through public tender/invitation to incorporate community needs and voices in the draft policy.
2. Design and Implement Sindh Climate Action Plan for next 10 years. The Action Plan must focus on key sectors such as Agriculture, Livestock, Forest and Wildlife to develop mitigation roadmap.
3. Draft Sindh Climate Change Policy 2022 must have a specific policy guideline on the increase of forest cover and preservation of existing forest cover which is less than 5%.
4. Strengthen Sindh Environment Protection Agency (EPA) and Provincial Disaster Management Authority (PDMA) structure at the District level.
5. Ensure transparency in aid flows, allocation procurement and distribution process through a provincial centralized tracking system which may be established by Provincial Disaster Management Authority (PDMA) or the Ministry of Planning & Development, Sindh. The provincial centralized tracking system must contain all information from relevant line departments working on climate change, including information on climate finances, budget and expenditures, in an easily accessible format.
6. Introduce citizen-friendly complaints and a grievance redress mechanism including corruption reporting channels to ensure that the concerns of communities are acknowledged and heeded.
7. A Complaint Hotline shall be established under Chief Minister Secretariat where complaints can be reported to a toll-free telephone number, web, email and fax or by mail, and handled effectively.
8. Focus on capacity building of affected communities, including women and vulnerable social groups on climate related issues including building resilience strategy to minimize the risks and vulnerability.

10. Enhance the role of Provincial Public Accounts Committee (PAC) on Climate Financing with the assistance of members representing Standing committees on Environment, Agriculture, Livestock and Wildlife Departments and anti-corruption agencies to ensure environmental crimes are investigated and prosecuted.
11. Ensure environmental impact assessments are conducted independently, include stakeholder consultations, aid beneficiaries and ensure that their recommendations are dealt with during projects implementation and evaluation.
12. Ensure strict compliance with Sindh Public Procurement Regulatory Authority Rules (SPPRA 2010) in emergency response and climate related projects and upload all contract information along with BOQ (Bill of Quantities) rates on the SPPRA Authority's website
13. Develop and implement robust whistleblower protection policy to encourage and protect those who report environmental crimes and corruption in relief and reconstruction efforts.
14. Develop and Implement Conflict of Interest Policy for climate finance and project staff to ensure integrity.
15. Designate Public Information Officers (PIO) as per Section 7, and proactively disclose all climate related projects information and agreements on the website of the Ministry of Climate Change as per Section 6 of Sindh Transparency and Right to Information Act 2016.
16. Conduct regular training of officers of Ministry of Climate Change and relevant line departments on Right to Information to facilitate public access to climate information.
17. Establish independent monitoring, evaluation and audits, including community-led social accountability tools, that reinforce public participation and accountability towards affected people.
18. Publish Audit and Annual Reports on the performance and climate related activities/projects of the Ministry of Climate Change and different line departments, to promote transparency and accountability. All reports must also be available in URDU to improve public perception.
19. Strict action must be taken against the staff found involved in corrupt practices.



Annex-B

No.SO(VII)/CMS/CMD/513/2023

CHIEF MINISTER'S SECRETARIAT, SINDH
KARACHI
Karachi dated 5th July, 2023

C.M DIRECTIVE

To,

The Secretary,
Environment Department,
Government of Sindh,
Karachi.

SUBJECT: TI PAKISTAN RECOMMENDATIONS ON DRAFT SINDH CLIMATE CHANGE POLICY 2022 TO ENHANCE INCLUSIVENESS AND INTEGRITY IN PROVINCIAL CLIMATE GOVERNMENT FRAMEWORK.

I am directed to forward herewith an original letter No.TIP2023/0616/1A dated 16-06-2023, alongwith its enclosures, received from Advocate Daniyal Muzaffar, Trustee / Legal Advisor, Transparency International Pakistan, on the subject noted above. The Hon'ble Chief Minister, Sindh has passed the following remarks thereon:-

**"For necessary action."
Sd/- Dated 04.07.2023
Chief Minister, Sindh**

2. It is, therefore, requested to kindly take necessary action in the matter, as per rules / policy, under intimation to this Secretariat.


(SARANG ALI)
SECTION OFFICER -VII

C.C. to:-

- I. The Additional Secretary (Staff) to Chief Minister, Sindh
- II. PS to Principal Secretary to Chief Minister, Sindh, Karachi.
- III. Advocate Daniyal Muzaffar, Trustee / Legal Advisor, Transparency International Pakistan, Plot 72-F/2, 1st Floor, 9th Street, Jami Commercial Phase VII, Defence Housing Authority, Karachi.
- IV. Master File.



2042-2023



TRANSPARENCY INTERNATIONAL - PAKISTAN

Plot 72-F/2, 1st Floor, 9th Street, Jami Commercial, Phase VII, Defence Housing Authority, Karachi
Phone: +92-21-35390408, 35311898
Fax: +92-21-35390410
Email: ti.pakistan@gmail.com
Website: www.transparency.org.pk

June 16, 2023

TIP2023/0616/1A

Syed Murad Ali Shah
Chief Minister
Government of Sindh
CM House,
Karachi

For necessary action

(Environment)

[Signature]
Chief Minister
Sindh
4/7/2023

PS to DS-III
Diary No. 155
Dated 05.07.23

Subject: TI Pakistan Recommendations on Draft Sindh Climate Change Policy 2022 to Enhance Inclusiveness and Integrity in Provincial Climate Governance Framework

Dear Sir,

Pakistan lies at the center of climate crisis and is ranked as the 5th most vulnerable country to be impacted by Climate Change. Transparency International Pakistan is striving to make climate action transparent and inclusive by working in partnership with communities and civil society to ensure participative policy making processes and the highest standards of transparency.

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Transparency International Pakistan requests the Chief Minister Sindh to consider the recommendations which are necessary to incorporate community needs and civic voices in the draft policy and enhance transparency and accountability.

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Regards,

[Signature]

Advocate Danijal Muzaffar
Trustee/Legal Advisor
Transparency International Pakistan

[Signature]
5/7
Go (nil)

Copies forwarded for the information:

1. Principal Secretary to PM, PM House, Islamabad
2. Federal Minister, Ministry of Climate Change, Islamabad
3. Federal Minister, Ministry of Planning, Development and Special Initiatives, Islamabad
4. Federal Minister, Finance and Revenue, Islamabad
5. Chief Secretary, Government of Sindh, Karachi

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12516
26/6

PATOS
Diary No. 791
Dated 26/6/23
4-7-23

PS / Secy. to CM
Diary No. 640
Dated 04.07.2023

Diary No. 2116
Date 05-07-23

[Signature]
5/7
3-6
[Signature]

PS Additional Secretary-V
Diary No. 1319
Dated 05.07.2023