

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,

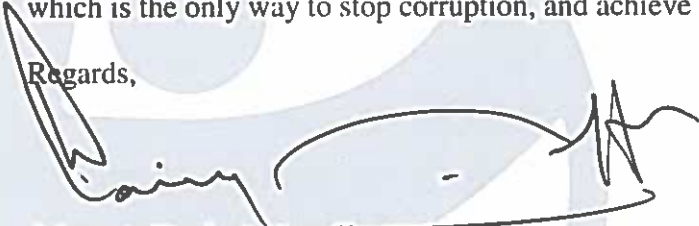
Pakistan lies at the center of climate crisis and is ranked as the 5th most vulnerable country to be impacted by Climate Change. Transparency International Pakistan is striving to make climate action transparent and inclusive by working in partnership with communities and civil society to ensure participative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

A NON-PARTISAN, NON-PROFIT COALITION AGAINST CORRUPTION

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.