

CSO Comments on FP085 ADB Pakistan (BM21, October 2018)

Green Bus Rapid Transit (BRT) Karachi

This is a large-scale category A bus rapid transit project proposed by the Asian Development Bank for the city of Karachi, Pakistan.

We find the project, a large-scale category A bus rapid transit project proposed by the Asian Development Bank for the city of Karachi, Pakistan, well articulated and thought out and are supportive of the proposal overall. We are appreciative in particular about efforts made in this proposal to thoroughly consider gender not as an add-on but a core-part of the project by integrating both transportation sector and location-specific gender dimensions into the proposed rapid bus transit line design and operation. This could set a good practice standard for other public transport projects the GCF might fund in the future.

Nevertheless, we want to point out two serious concerns regarding the project, one procedural and one conceptual as it relates to the project's potential for replicability:

- On the procedural issue – while the project proposal was categorized as a Category A high risk proposal due to the potential for involuntary resettlement, the GCF active observers were only notified about this project 30 days prior to the Board consideration, instead of the 120 day prior disclosure on environmental and social safeguards issues related to the project as required under the GCF Information Disclosure and Environmental and Social Policies. As this was not the only instance, this points to serious challenges and failures in the application of the IDP and related communication requirements between the GCF Accredited Entities and the Secretariat with respect to their duty to inform the public, civil society, and local communities sufficiently early about projects such as this one to enable them to voice their concerns and participate in and influence decision-making. If nothing else, these instances must be used to trigger review of and improvements to the ongoing implementation of the GCF IDP.
- On the conceptual issue – We agree with the Secretariat and ITAP assessments that the project using biomethane as supposedly zero-emission has the potential to be a game-changer for the transport sector, particularly given the difficulty around mass transportation emissions, as this energy source is readily available and will not add any significant additional greenhouse gas emissions beyond what would have already been produced from the industrial agriculture facility. However, this approach is not transformational on larger scales and in the longer term as it is based on re-using emissions from industrial agricultural productions which actually have to be curbed drastically to achieve a truly low-carbon pathway. Although it seems to make sense in Karachi's immediate situation—it may lock-in a practice that is unsustainable in the longer term. Furthermore, a wide-spread and large scale replication of the biomethane approach for bus rapid transit is not tenable as the Karachi model is based on already ongoing significant methane emissions. We would argue against a widespread adoption of this approach. More consideration should be taken to phase out methane emissions from agroindustrial production and promote long-term transformation. In this case, the 'sustainability' of the project should not be its ability to be continued indefinitely without further GCF support, but its ability to facilitate a transition away from methane and other GHGs in the short term and act as a bridge toward other more renewable forms of energy and sustainable modes of production.