Government of Pakistan
Public Procurement Regulatory Authority
(Cabinet Division)
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No. 1/266/2013/Legal/PPRA Islamabad, the 16th November, 2026

Subject: **GUIDELINES FOR CONSTITUTION AND FUNCTIONING OF GRIEVANCE REDRESSAL COMMITTEES UNDER RULE 65 OF THE PUBLIC PROCUREMENT RULES, 2026**

1. Background and purpose

1.1. Rule 65 of the Public Procurement Rules, 2026, provides for the constitution of a Grievance Redressal Committee (GRC) to address complaints of bidders or other parties arising before the entry into force of a procurement contract.

1.2. To facilitate uniform implementation of Rule 65 and address recurring queries received from procuring agencies, the following guidelines are issued to clarify the constitution, composition and functioning of GRCs.

1.3. These guidelines shall be read with Rule 65 of the Public Procurement Rules, 2026, and the applicable provisions of the public procurement regulatory framework. Nothing in these guidelines shall be construed as amending, overriding or relaxing any mandatory requirement of the Rules.

2. Constitution and independence of the GRC

2.1. In accordance with Rule 65(1), the Principal Accounting Officer, Head of the Procuring Agency or any authorized officer shall constitute a GRC comprising an odd number of members, completely outside the procuring agency, from another procuring agency or from the pool of independent experts maintained by the Authority and accessible through EPADS.

2.2. The GRC shall remain completely outside the Procuring Agency (PA) whose procurement is the subject of the complaint. For this purpose, the requirement that members be outside the PA means that they must be entirely external to the organization concerned, irrespective of the number of offices, units or subordinate establishments through which it operates. Accordingly, no officer or official belonging to the same organization shall be included in the GRC.

2.3. Members may be drawn from other procuring agencies of the Federal Government, possessing relevant qualifications, experience or technical expertise, provided that they are outside the procuring agency concerned and meet the independence requirements under Rule 65.

2.4. Where a procuring agency requires members from another procuring agency for constitution of a GRC, the Head of the requesting procuring agency shall make a formal written request to the Head of the concerned procuring agency for nomination of suitable member(s). Members of a GRC shall be of at least officer level. The requesting procuring agency shall not approach or communicate directly with individual officers of the other procuring agency for their nomination or engagement as GRC members.

2.5. Where members are selected from outside the pool of independent experts, the procuring agency shall ensure, before their appointment, that no actual or potential conflict of interest exists that may compromise their independence or impartiality. The same principle

shall apply to members selected from the pool of independent experts.

2.6. A procuring agency may constitute a standing GRC to deal with grievances relating to multiple procurements or constitute a separate GRC for each procurement, as deemed appropriate, subject to compliance with Rule 65 of the Public Procurement Rules, 2026, including the prescribed requirements regarding composition, independence and impartiality of the GRC.

2.7. Where a GRC is constituted from the pool of independent experts, its members shall observe the applicable code of conduct and disclose any actual or potential conflict of interest before undertaking an assignment. The Authority may issue further instructions regarding the code of conduct and its implementation, as and when required.

3. Composition of the GRC

3.1. A GRC may ordinarily comprise three members, subject to the requirement under Rule 65(1) that the committee consist of an odd number of members.

3.2. Where a complaint involves a specialized technical, financial, legal or other subject requiring additional expertise, the GRC may co-opt a relevant specialist as a non-voting member with the approval of the Head of Procuring Agency. Such co-option shall be for the purpose of obtaining expert assistance and shall not affect the prescribed composition of the GRC.

3.3. The procuring agency shall ensure that the members constituting the GRC are duly notified and possess the necessary powers and authorizations to examine and decide complaints in accordance with Rule 65.

4. Remuneration of GRC members

4.1. Where members are engaged from outside the pool of independent experts, the respective organizations may make arrangements, with or without remuneration, on mutually agreed terms, subject to the applicable financial rules, administrative approvals and other relevant requirements. The arrangement shall not compromise the independence, impartiality or decision-making of the GRC.

4.2. Remuneration, where applicable, shall be determined on a per-procurement basis. Only one payment shall be admissible for a procurement, irrespective of the number of grievances received in relation to that procurement. No separate or additional payment shall be admissible for multiple grievances arising from the same procurement.

4.3. Remuneration shall become payable only where a grievance relating to the procurement has actually been received and the GRC has undertaken the corresponding grievance redressal assignment. The mere constitution or notification of a GRC, in the absence of a grievance, shall not entitle its members to payment.

5. Meetings of the GRC

5.1. A GRC may conduct its meetings physically or through virtual means, as appropriate to the circumstances of the complaint.

5.2. Where a virtual meeting is held, the GRC shall ensure that all members can participate effectively, relevant parties are afforded a fair opportunity to present their submissions where required, and the confidentiality and integrity of the proceedings are maintained.

5.3. The proceedings, submissions considered, deliberations and decision of the GRC shall be properly documented and retained on record in accordance with the applicable

requirements. The mode of meeting shall not affect the GRC's obligation to decide the complaint within the period prescribed under Rule 65(6).

6. Compliance with statutory timelines and record

6.1. The constitution and functioning of the GRC shall not delay or otherwise affect the statutory timelines prescribed under Rule 65 for the filing, examination and disposal of complaints.

6.2. The procurement cell of the procuring agency shall maintain the notification constituting the GRC, details of its members, declarations regarding conflicts of interest, relevant proceedings and the decision rendered by the GRC, as applicable.

6.3. All members shall exercise their functions impartially and in accordance with the public procurement regulatory framework. The GRC shall examine and decide complaints within its jurisdiction and shall not exercise powers beyond those conferred by the applicable law.

7. General

7.1. Procuring agencies shall ensure that GRCs are constituted in a timely manner and in accordance with Rule 65 and these guidelines.

7.2. The Authority shall maintain a pool of independent experts to facilitate procuring agencies in constituting GRCs. However, the Authority shall not recommend or nominate any member for a particular GRC. The selection and engagement of members from the pool, or from another procuring agency, shall remain the responsibility and discretion of the procuring agency constituting the GRC.

7.3. These guidelines are intended to facilitate consistent implementation of the existing regulatory framework. In the event of any inconsistency between these guidelines and the Public Procurement Rules, 2026, the Rules shall prevail.

(NISA SYED)
Legal Expert/Staff Officer

CC,
Director IT PPRA, with a request to upload the same on the Authority's website for information of the procuring agencies, bidders and general public.