



Dated: 10<sup>th</sup> March, 2023

To

The Chairman,  
Transparency International Pakistan (TIP),  
Plot 72-F/2, 1<sup>st</sup> Floor, 9<sup>th</sup> Street,  
Jami Commercial, Phase VII,  
DHA, Karachi

Attention: Advocate Daniyal Muzaffar, Trustee / Legal Advisor TIP

Subject: COMPLAINT AGAINST ALLEGATION OF VIOLATION OF PUNJAB  
PUBLIC PRIVATE PARTNERSHIP ACT 2019 IN THE EXPRESSION OF  
INTEREST (EOI) FOR WASTE TO ENERGY PROJECT IN LAHORE

I am directed to refer to your letter No.TL2023/0209/IA, dated 09.02.2023, on the subject cited above, addressed to Chief Minister Punjab with copy to Secretary Energy Punjab.

2. Energy Department, GoPb accords priority to promotion and development of renewable power projects based on indigenous resources. Power projects using Waste to Energy (WtE) technology are amongst top priorities of Energy Department in view of their huge environment benefits and scientific disposal of Municipal Solid Waste (MSW). MSW generation in Pakistan and Punjab is about 34 million tons/year & 18 million tons/year respectively. The ever-increasing waste generation trend has created public concerns with regard to the resultant serious health and environmental hazards.
3. Lahore Waste Management Company (LWMC) has reported that over 20 million tons of legacy waste is already deposited at two dumping sites in Lahore; Mehmood Booti is already full to its capacity and Lakhodair landfill site has more than 10 million tons of dumped MSW. Open dumping of MSW is a serious threat to the environment as it releases methane gas into the ambient air. As per global reports, the methane emissions are 25 times more harmful than CO<sub>2</sub>. In addition, untreated leachate from wet MSW make under-ground water contaminated and unfit for drinking purposes. The above risks can trigger air and water borne diseases and deteriorate Air Quality Index (AQI).
4. Punjab Power Development Board (PPDB), Energy Department GoPb provides one window facility to private investors for development of power generation projects based on all fuels and technologies under the Punjab Power Generation Policy 2009. PPDB invited EOI for pre-qualification of local and foreign investors for development of approximately 50 MW WtE project at Lahore (the "Project").

5. LWMC provided waste availability range of 2000-3000 tons of MSW/day at the pre-qualification stage. The participating companies are to be pre-qualified on basis of their financial and technical strength against the indicated project capacity of 50 MW. The provided waste availability range has no impact on pre-qualification. Later, on request of PPDB, LWMC confirmed precise waste supply assurance for 3000 tons of MSW/day. This waste supply assurance will be shared with the pre-qualified sponsors during next stage of bidding i.e. for preparation of bids.

6. PPDB has initiated development of the Project under the Punjab Power Generation Policy 2009 through private investment. The Project does not involve public-private partnership and hence does not fall under the purview of Punjab Public Private Partnership Act 2019 (PPP Act 2019).

7. PPDB has reported that the Transparency International Pakistan (TIP), while examining the contents of the complaint did not engage with PPDB. It is further reported that TIP has framed its recommendations, unilaterally, without soliciting viewpoint of PPDB. Regardless of the above, it is apparent that the contents of the complaint filed by the complainant before the TIP are frivolous and reflect malicious intent to sabotage the 50 MW Lahore WtE project of national and provincial interest.

8. In view of the above, it is requested that the subject complaint, being void of merits, may please be discarded.

With best regards,



**SECTION OFFICER (CONSV.)  
ENERGY DEPARTMENT**

**C.C:**

1. PS to Prime Minister, Prime Minister House, Islamabad
2. PS to Governor Punjab, Governor House, Lahore
3. PS to Chief Minister Punjab, Chief Minister's Secretariat, Lahore
4. Chairman, National Accountability Bureau (NAB), Islamabad
5. Registrar, High Court of Punjab, Lahore
6. Chief Executive Officer, Punjab Public Private Partnership Authority, Lahore
7. Chief Executive Officer, Lahore Waste Management Company, Lahore
8. Managing Director, Punjab Power Development Board, Lahore
9. Focal Person, Pakistan Citizen Portal (PCP) / Prime Minister Delivery Unit (PMDU) / Section Officer (Companies), Energy Department.
10. PS to Secretary, Government of the Punjab, Energy Department
11. PS to Addl. Secretary (Dev.), Government of Punjab, Energy Department