



November 14, 2025

TL2025/1114/2A

Chief Executive Officer
Sindh Healthcare Commission
Karachi

Subject: Complaint Against Allegations of Non-Compliance by Private Diagnostic Laboratories with Revised Fees for Dengue, Malaria, and CBC Tests

Dear Sir,

Transparency International Pakistan has received a complaint against allegations of non-compliance by private diagnostic laboratories with revised fees for dengue, malaria and CBC tests in the Sindh province.

The complainant has made the following allegations:

1. The Sindh Healthcare Commission's issued notification on 21 October 2025 mandating revised maximum fees for dengue, malaria, and complete blood count (CBC) tests.
2. However, many private diagnostic laboratories and hospital-based labs continue to charge patients rates above the prescribed limits.
3. Major laboratories are implementing the revised rates only partially, while other private hospitals' in-house laboratories and some government-affiliated diagnostic labs continue to charge patients their own rates.
4. This non-compliance persists even when patients present valid prescriptions, undermining the purpose of the revised fee structure which aims to ensure affordable diagnostic testing amid rising dengue and malaria cases in Sindh.

Transparency International Pakistan Comments and Recommendations

Transparency International Pakistan has reviewed the allegations of the complaint, prima facie, the allegations seem correct.

Following are TI Pakistan comments:

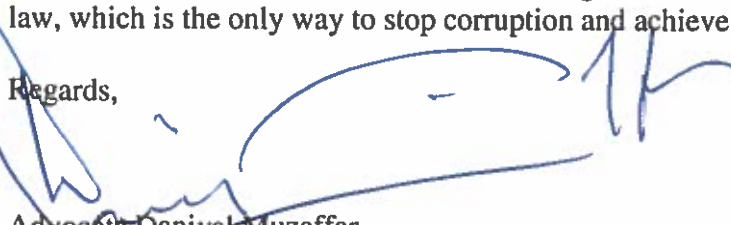
1. The Sindh Healthcare Commission (SHC) has issued compliance letters and reiterated the applicability of revised rates; however, such complaints indicate that enforcement remains inconsistent. Non-compliance not only burdens low-income patients but also diminishes public confidence in regulatory mechanisms and healthcare governance.
2. The SHC must initiate monitoring of diagnostic laboratories to verify compliance as well as issue instructions reminding all laboratories of mandatory adherence to the revised rates.
3. The SHC must publicize its reporting mechanism for patients to lodge complaints regarding overcharging along with proactive display of revised rates at all diagnostic facilities for transparency and patient awareness
4. Access to affordable healthcare services is a fundamental right, and consistent enforcement of regulatory compliance is essential to uphold transparency, accountability, and integrity in the health sector.



Transparency International Pakistan requests the Chief Executive Officer, Sindh Healthcare Commission, to take action to ensure full implementation of the revised fee structure across all private and hospital-affiliated laboratories in the province.

Transparency International Pakistan is striving for the across-the-board application of the 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 with a request to take action under their mandate to:

1. Chief Minister Sindh, CM House, Karachi
2. Chief Secretary, Government of Sindh, Karachi.
3. Minister Health, Govt of Sindh, Karachi
4. Secretary Health, Health Department, Karachi
5. Registrar, High Court Sindh, Karachi.

Note:

This is to clarify that Transparency International Pakistan is not a complainant, it acts as a whistleblower and operate under Article 19-A, of the Constitution of Pakistan which gives the right to public to know how government is being run by public officers. Article 19-A makes the right to access of information pertaining to a public authority a fundamental right, and a three member bench in case of Mukhtar Ahmad Ali vs the Registrar, Supreme Court of Pakistan, Islamabad, headed by Chief Justice Qazi Faez Isa in the landmark judgment on 16 October 2023, in CP No. 3532/2023, has declared that

“What previously may have been on a need-to-know basis Article 19A of the Constitution has transformed it to a right-to-know, and the Access to information is no longer a discretion granted through occasional benevolence, but is now a fundamental right available with every Pakistani which right may be invoked under Article 19A of the Constitution”