



December 22, 2025

TL2025/1222/1A

Capt. (Retd) Asadullah Khan  
Chairman and CEO  
National Highway Authority (NHA)  
Islamabad.

**Subject: Complaint Against Allegations of Violation of Public Procurement Regulatory Authority (PPRA) Rules 2004 by NHA South Zone, Karachi, for 18 Different Work Orders Amounting to Rs. 1.496 Billion**

Dear Sir,

Transparency International Pakistan has received a complaint against allegations of violation of Public Procurement Regulatory Authority (PPRA) Rules 2004 by NHA South Zone, Karachi, for 18 different work orders amounting to Rs. 1.496 billion (Annex-A).

The complainant has made the following allegations that;

1. National Highway Authority (NHA), South Zone, Karachi has awarded 18 different work orders on Lyari Express Way on direct contracting without inviting open tenders.
2. As per PPRA Rules 2004, the emergency procurement can only be invoked in situations which pose serious risk to public safety. However, none of the work order awarded by NHA under direct contracting, meets the criteria of emergency procurement.
3. In the last year, no emergency, accident or disaster occurred on Lyari Expressway and it is clear that the NHA could have planned for the current procurement under its procurement plan to be awarded through competitive bidding.
4. NHA is in consistent practice of awarding single NITs without transparent competition, potentially causing loss of millions to the exchequer.

**Transparency International Pakistan Comments and Recommendations**

Transparency International Pakistan has reviewed the allegations of the complaint, prima facie, allegations seem correct. Following are TI Pakistan comments:

1. The exemption from PPRA Rules 2004 will cause loss to the exchequer due to non-competitive rates.
2. NHA must invite open tenders to allow for the widest competition, in line with PPRA Rules. This will reduce the contract award cost, resulting in savings to the exchequer.

Transparency International Pakistan requests the Chairman and CEO of National Highway Authority (NHA) to look into the serious allegations of the complaint, and issue directives for the compliance with PPRA Rules 2004 in all procurements of NHA.

Transparency International Pakistan is striving for across-the-board application of the Rule of Law, which is the only way to stop illegal practices and achieve Zero tolerance against corruption.

Regards,

  
Advocate Daniyal Muzaffar,  
Trustee/Legal Advisor  
Transparency International Pakistan



Copies forwarded for the information with request to take action under their mandate to:

1. Advisor to Prime Minister, Prime Minister House, Islamabad.
2. Chairman, Prime Minister Inspection Commission (PMIC), Islamabad.
3. Federal Minister, Ministry of Communications, Islamabad.
4. Secretary, Ministry of Communications, Islamabad.
5. Managing Director, Public Procurement Regulatory Authority (PPRA), Islamabad.
6. Registrar, Supreme Court of Pakistan, Islamabad.

**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”**

AMB

Annex-A  
Phone: 022-3882822  
Cell: 0333-2528786

**AMB & CO**

Add: Allah Bux Brohi, P.O Alr Port Road, Latifabad, Hyderabad

Ref: AMB/HYD/25/7214

Date: 12-12-2025

To,  
The Justice (R) Zia Parwez  
Chairman Transparency International Pakistan

**Subject: Formal Complaint Regarding Violation of PPRA Rule 42(c) (IV), Misconduct, and Suspected Corruption Amounting to Rs. 1,496 Billion in NHA South Zone, Karachi**

Respected Sir,

We, M/s AMB & Co., respectfully submit this formal complaint regarding serious violations of PPRA Rules—specifically Rule 42(c) (IV)—along with grave concerns of misconduct, non-transparency, and suspected mega corruption in the award of multiple contracts by the National Highway Authority (NHA), South Zone, Karachi, Sindh.


It has come to our notice that 18 work orders amounting to approximately Rs. 1,496 billion were awarded on the pretext of "emergency works" on the Lyari Expressway (LEW). However:

1. No Notice Inviting Tender (NIT) was published on the NHA website or the PPRA portal, as required under PPRA Rules.
2. No tender documents, evaluation reports, or procurement records are available publicly, indicating clear non-compliance with PPRA transparency requirements.
3. As per PPRA Rule 42(c) (IV), emergency procurement may only be invoked in situations involving:
  - serious risk to public safety,
  - road washouts,
  - bridge collapse,
  - flood damage, or
  - other unforeseen disasters.

However, no such emergency, accident, or disaster occurred on the Lyari Expressway during the relevant period that would justify bypassing the competitive bidding process. Instead, beautification and routine works were awarded directly to a select group of favored contractors, which clearly does not meet the criteria for emergency procurement under PPRA rules.

Furthermore, it is concerning that:

- More than one year has passed without a single NIT being published by NHA South Zone.

  
**AMB & CO**  
Proprietor

AMB

Phone: 022-3882822

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**AMB & CO**

Add: Allah Bux Brohi, P.O Air Port Road, Latfabad, Hyderabad

Ref: \_\_\_\_\_

Date: \_\_\_\_\_

- Millions of rupees in payments to various contractors are still pending
- Meanwhile, certain preferred contractors continue to receive direct contracts and immediate payments, indicating discriminatory practices and possible misuse of authority.

### Request for Action

In light of the above serious violations, we respectfully request Honorable Chairman & Honorable Members of Standing Committee to:

1. Conduct a comprehensive inquiry into the award of the 18 contracts claimed as "emergency works."
2. Verify compliance with PPRA Rules, specifically Rule 42(c) (IV) and Rules 4, 12, and 59.
3. To order to Produce Complete procurement details, including:
  - Copies of approval notes declaring emergency,
  - Justification reports,
  - Work orders,
  - Contractor selection criteria,
  - Payment details,
  - Internal evaluations.
4. Initiate disciplinary action against officers responsible for violating procurement laws and causing loss to the national exchequer.

Thank you.

\*List of works and other detail is attached\*

Regards,

Ali Ahmed Brohi

M/s AMB & Co.

**AMB & CO**  
Proprietor

#	Route No	Contract No	Date of Award	Engineer Estimate Cost (PKR)	Date of Completion
1	LEW (SBC)	EM (S)-2024-25 SS-5003	27-06-2025	92,376,397.00	26-07-2025
2	LEW (NBC)	EM (S)-2024-25 SS-5004	27-06-2025	58,623,779.00	26-07-2025
3	LEW (NBC)	EM (S)-2024-25 SS-5005	27-06-2025	99,231,390.00	26-07-2025
4	LEW (SBC)	EM (S)-2024-25 SS-5006	27-06-2025	98,971,240.00	26-07-2025
5	LEW (NBC)	EM (S)-2024-25 SS-5007	27-06-2025	396,410,028.06	26-07-2025
6	LEW (SBC)	EM (S)-2024-25 SS-5008	27-06-2025	326,610,693.00	26-07-2025
7	LEW (NBC)	EM (S)-2024-25 SS-5012	08-09-2025	49,208,050.00	07-10-2025
8	LEW (NBC)	EM (S)-2024-25 SS-5013	08-09-2025	77,768,303.00	07-10-2025
9	LEW (NBC)	EM (S)-2024-25 SS-5014	08-09-2025	26,971,988.00	07-10-2025
10	LEW R/S	EM (S)-2024-25 SS-5015	08-09-2025	25,781,664.00	07-10-2025
11	LEW (NBC)	EM (S)-2024-25 SS-5016	08-09-2025	27,899,951.00	07-10-2025
12	LEW (SBC)	EM (S)-2024-25 SS-5017	08-09-2025	18,168,731.00	07-10-2025
13	LEW (NBC)	EM (S)-2024-25 SS-5018	08-09-2025	30,000,618.00	07-10-2025
14	LEW (SBC)	EM (S)-2024-25 SS-5019	08-09-2025	73,743,901.00	07-10-2025
15	LEW (NBC)	EM (S)-2024-25 SS-5020	08-09-2025	43,268,305.00	07-10-2025
16	LEW (SBC)	EM (S)-2024-25 SS-5021	08-09-2025	96,387,40.00	07-10-2025
17	KNB to NBC	EM (S)-2024-25 SS-5022	08-09-2025	20,220,571.00	07-10-2025
18	KNB to NBC	EM (S)-2024-25 SS-5023	08-09-2025	21,485,514.00	07-10-2025
			<b>TOTAL</b>	<b>1,496,379,863.06</b>	