

PRIME MINISTER'S OFFICE
PRIME MINISTER'S INSPECTION COMMISSION
ISLAMABAD

F.No.1(1)/Dir/TIP-Misc.Complaints/PMIC/2023

September 2nd, 2026

Subject: **Complaint Against Allegations of Violation of PPRA Rules 2004 by Sui Northern Gas Pipelines Limited (SNGPL) in Tender No. SNT-2296-25 & P.O No. T-2912/26 for CIP Survey Equipment**

I am directed to enclose a self explanatory letter dated 09.07.2026 from Transparency International Pakistan, Karachi on the subject cited above (***copy enclosed***).

2. The competent authority has desired that "MD, SNGPL, Lahore" may look into the observation raised by Transparency International Pakistan (TIP) and ensure transparency / compliance with PPRA Rules, 2004 / applicable laws in the aforementioned tendering for 'CIP Survey Equipment' under intimation to this office.

3. This issues with the approval of competent authority.


(Muhammad Farrukh Saleem)
Assistant Director-II
051-9201699

Managing Director,
Sui Northern Gas Pipelines Limited (SNGPL),
Lahore.

Copy to:

1. Secretary, Ministry of Energy (Petroleum Division), Islamabad.
2. ✓ Advocate Daniyal Muzaffar, Trustee / Legal Advisor, TIP at "Plot 72F/2, Floor 1, 9th Street, Jami Commercial Street, DHA Phase 7, Karachi.
3. PS to Chairman, PMIC.
4. PS to Member-V, PMIC.



TRANSPARENCY INTERNATIONAL - PAKISTAN

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July 09, 2026

TL2026/0709/1A

Mr. Amer Tufail
Managing Director,
Sui Northern Gas Pipelines Limited (SNGPL)
Lahore

Subject: Complaint Against Allegations of Violation of PPRA Rules 2004 by Sui Northern Gas Pipelines Limited (SNGPL) in Tender No. SNT-2296-25 & P.O No. T-2912/26 for CIP Survey Equipment

Dear Sir,

Transparency International Pakistan has received a complaint against allegations of violation of Public Procurement Regulatory Authority (PPRA) Rules 2004 by SNGPL in Tender No. SNT-2296-25 & P.O No. T-2912/26 for procurement of CIP Survey Equipment.

The complainant has made the following allegations:

1. The SNGPL invited bids through Tender No. SNT-2296/25 for the procurement of CIP Survey Equipment.
2. M/s MAS Associates, the successful bidder had quoted Interrupter model SMART 150A which do not meet the tender clause 3.2b & 3.2c of the General Terms and Conditions of Tender (Annex-A).
3. The specification of tender mentions 2 major components i.e. Equipment (Meter) with GPS Synchronised current Interrupter and with 1 CIP meter 3 Interrupters.
4. The Accessories mentioned in tender documents include Data probes and wire dispenser and no other items is mentioned as accessories beyond these two. However, the evaluation has put the most expensive component i.e INTERRUPTER which cost approx. US \$4000 each unit, (total 3 interrupters cost approx 12000 US\$ with each meter) and put the same in accessories and evaluated accordingly. This is in complete violation of specifications defined in tender documents as accessories (Annex-B).
5. The offered interrupter model, SMART 150, has been manufactured for only about two years, which can also be verified online. This contradicts with clause 3.2 b & 3.2 c of tender general terms and conditions (Annex-C).
6. In complete violation of PPRA Rule 35, SNGPL has also published purchase order on and dispatched on the same day i.e. June 18, 2026.

Transparency International Pakistan Comments

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

Following are TI Pakistan's comments:

1. The Rule 30(1) of the Public Procurement Rules, 2004 requires that the procuring agency evaluate all bids strictly in accordance with the evaluation criteria and other terms and conditions specified in the bidding documents. In the present case, if allegations are correct, the evaluation is in contravention of tender specifications. The Rule is quoted below for your reference;

30. Evaluation of bids.--- (1) All bids shall be evaluated in accordance with the evaluation criteria and other terms and conditions set forth in the prescribed bidding documents. Save as provided for in sub-clause (iv) of clause (c) of rule 36 no evaluation criteria shall be used for evaluation of bids that had not been specified in the bidding documents.



2. Where an unauthorized breach of the Public Procurement Rules, 2004 is established, Rule 50 provides that such breach shall amount to mis-procurement.

50. Mis-procurement.--- Any unauthorized breach of these rules shall amount to mis-procurement.

Transparency International Pakistan Recommendations

Transparency International Pakistan requests the MD SNGPL to review the allegations of the complaint, and if found correct, issue directives to for compliance with PPRA Rules, 2004 to avoid mis-procurement.

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

1. Advisor to PM, PM House, Islamabad
2. Federal Minister, Ministry of Energy, Islamabad.
3. Chairman, Prime Minister Inspection Commission, Islamabad.
4. Managing Director, Public Procurement Regulatory Authority (PPRA), Islamabad.
5. 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”