

December 16, 2025

TL2025/1216/1A

Dr. Faisal Ahmad Khan  
Chief Executive Officer  
Balochistan Public Private Partnership Authority  
Government of Balochistan

**Subject: TI Pakistan Recommendations for Strengthening Transparency, Governance and Integrity Mechanisms for the Balochistan Carbon Offset Project**

Dear Sir,

Transparency International Pakistan would like to draw your attention to the recommendations from Carbon Market Readiness in Pakistan report, in the context of the recent announcement regarding the carbon offset afforestation, reforestation and revegetation project to be executed under the Public Private Partnership model across Gwadar and Lasbela (**Annex-A**). Given the financial significance and long-term implications of carbon market initiatives, TI Pakistan highlights key recommendations drawn from its national assessment titled *Carbon Markets Readiness in Pakistan: Addressing Governance Gaps and Safeguarding Against Integrity Risks* (**Annex-B**). The report was officially launched on December 09, 2025 by the Coordinator to the Prime Minister of Pakistan on Climate Change.

TI Pakistan is confident that the recommendations from this report will support the Authority in ensuring that the provincial projects are designed and implemented with strong governance, oversight and inclusive public interest safeguards.

TI Pakistan report highlights governance risks that can affect provincial level carbon projects, including unclear ownership structures, weak data systems, fragmented institutional coordination and limited mechanisms for community benefit sharing. In light of these findings, Transparency International Pakistan request the implementation of the following recommendations as part of the project BPP

- BPPPA must ensure clear guidelines and criteria on carbon credit ownership, roles of implementing agencies and processes for oversight and compliance
- Adopt transparent benefit sharing arrangements to ensure fair and equitable participation of local and indigenous communities
- Adopt a robust data and MRV system aligned with national standards, including public documentation of baselines, methodologies and reporting
- Ensure public disclosure of all project related information including audits and performance reports
- Mandate independent third-party audits and an accessible grievance redress mechanism to uphold accountability
- Ensure structured capacity building for provincial departments, technical teams and community institutions involved in project implementation

Transparency International Pakistan believes that BPPPA can set a national example in high integrity and transparent carbon project development. Integrating these measures at the planning stage will strengthen provincial credibility, safeguard public resources and support the successful delivery of climate related outcomes for the people of Balochistan.

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 request to take action under their mandate to:

1. Chief Minister, Government of Balochistan, Quetta
2. Chief Secretary, Government of Balochistan, Quetta
3. Secretary, Forest and Wildlife Department, Government of Balochistan, Quetta
4. Secretary, Environment Department, Government of Balochistan
5. Chairman, Balochistan Public Procurement Regulatory Authority, Quetta
6. Registrar, Balochistan High Court, Quetta

**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”

## Executive Summary: Addressing Governance Gaps & Safeguarding Against Integrity Risks in Carbon Markets in Pakistan

Pakistan faces mounting climate-related risks, including catastrophic floods, glacial melt, water scarcity, and agricultural decline. The adoption of *Policy Guidelines for Trading in Carbon Markets* (2024), marks a critical step toward leveraging carbon markets as a strategic tool for carbon mitigation. This report provides the first comprehensive assessment of Pakistan's readiness for carbon markets. It identifies governance, institutional, and integrity risks and proposes actionable recommendations for establishing a credible, transparent, and inclusive carbon market ecosystem aligned with global best practices and Article 6 of the Paris Agreement.

### Key Findings:

- **High Potential, Low Readiness:** Pakistan's emissions profile offers an opportunity to generate USD 400 million–2.25 billion in annual carbon revenue. Yet weak legal, institutional, and technical systems hinder effective participation.
- **Governance Gaps:** The absence of a legal framework defining carbon credit ownership, fragmented institutional mandates, limited technical capacity, and a lack of robust Measurement, Reporting and Verification (MRV) systems undermine market integrity.
- **Data Deficiency:** Incomplete national emissions baselines and siloed data systems prevent reliable crediting and risk double-counting.
- **Equity and Inclusion Deficits:** Current policy frameworks inadequately address benefit-sharing, community participation, and safeguards for marginalized groups, risking social inequities and reduced public trust.
- **Transparency and Accountability Risks:** Weak disclosure mechanisms, limited grievance redress systems, and insufficient oversight heighten the risk of elite capture and corruption.

### Recommendations:

1. **Legal & Institutional Reform:** Enact legislation defining carbon credits as tradeable assets, clarify institutional mandates, and establish an independent oversight body.
2. **Data & MRV Infrastructure:** Develop a unified national carbon registry, integrate provincial data systems, and ensure transparent emissions reporting.
3. **Integrity & Transparency Mechanisms:** Mandate public disclosure of project data, independent auditing, and transparent benefit-sharing.
4. **Inclusion & Benefit-Sharing:** Establish frameworks ensuring that local communities, especially Indigenous and marginalized groups, equitably benefit from carbon revenue.
5. **Capacity Building:** Strengthen institutional, technical, and governance capacities at federal and provincial levels through targeted training and partnerships.

### Conclusion:

Pakistan stands at a pivotal juncture. If implemented with integrity, transparency, and inclusivity, carbon markets can become a cornerstone of Pakistan's climate finance strategy, mobilizing billions in green investment while empowering communities and safeguarding ecosystems. However, without urgent governance reforms, the same mechanisms risk entrenching inequities and undermining climate action credibility.



## GOVERNMENT OF BALOCHISTAN BALOCHISTAN PUBLIC PRIVATE PARTNERSHIP AUTHORITY

### INVITATION FOR BIDS

**DESIGN, BUILD, FINANCE, OPERATE, MAINTAIN AND TRANSFER CARBON OFFSET PROJECT -  
AFFORESTATION, REFORESTATION AND REVEGETATION (ARR) PROJECT IN BALOCHISTAN**

### INTERNATIONAL COMPETITIVE BIDDING

#### Project Brief

The Balochistan Public-Private Partnership Authority (BPPPA), in lead of Forest & Wildlife Department, Government of Balochistan, is inviting proposal from potential bidders to develop and implement the Balochistan Carbon Offset Project under Public-Private Partnership (PPP) for a concession period of 46 Years (01 Year Development and 45 Years O&M period). The project is for the Afforestation, Reforestation and Revegetation (ARR) Project across 34,351 ha of eligible land across the coast of Balochistan in Districts Gwadar and Lasbela.

**Pre-Bid Meeting:** Jan 06, 2026 at 12:00 pm PST

Meeting ID: 810 7878 0618, Passcode: 036564

Bidders interested to attend the pre-bid meeting physically may inquire the details of the venue from the Balochistan Public Private Partnership Authority.

#### Basic Eligibility Criteria

All interested bidders shall meet the Basic Eligibility Criteria as provided in the RFP.

#### Bidding Procedure

The Project's procurement shall be conducted in accordance with the 'International Competitive Bidding' using 'Single-Stage-Two-Envelope' procedure as per the Balochistan Public Private Partnership Rules, 2022.

**Bid Submission Deadline / Opening Date:** 11:00 AM PST on February 03, 2026. Bids will be opened on the same day at 11:30 AM PST at the address given below.

All Bidders are required to furnish a 'Bid Security', enclosed in the Technical Proposal, equivalent to PKR 200 Million in the form of a bank guarantee issued by a scheduled bank in Pakistan or from a foreign bank duly counter guaranteed by a scheduled bank in Pakistan in favour of the CEO, BPPPA.

Bids that are not prepared on the prescribed formats as contained in the RFP may not be considered for evaluation. The advertisement and request for proposal document can be downloaded from BPPPA website mentioned below.

**BPPPA Office Address:** A-49, JINNAH TOWN, QUETTA, PAKISTAN

**PHONE:** +92-81-250 3098

**EMAIL:** ahsanullah@bpppa.gob.pk, faraz.syed@bpppa.gob.pk **WEBSITE:** <https://bpppa.gob.pk>