

August 19, 2026

TL2026/0819/1A

Syed Murad Ali Shah
Chief Minister Sindh
CM House Karachi

Subject: Complaint Against Allegations of Restrictive and Non-Competitive Bidding Criteria in Violation of World Bank Procurement Guidelines by SWEEP Project in the Tender for Construction of Dumpsite Closure Works at Jam Chakro (Project ID: P172221 – SWEEP; Tender Ref: PK-PIU SSWMB-564405-CW-RFB)

Dear Sir,

Transparency International Pakistan has received a complaint alleging that the Sindh Water and Wastewater Emergency and Efficiency Project (SWEEP) has adopted restrictive and non-competitive bidding criteria in violation of World Bank procurement principles in the tender for Construction of Dumpsite Closure Works at Jam Chakro (Project ID: P172221 – SWEEP; Tender Ref: PK-PIU SSWMB-564405-CW-RFB). The complainant has made the following allegations:

The complainant has raised the following allegations:

1. The Bidding Documents contain arbitrary, non-technical, and highly restrictive qualification criteria that serve no engineering purpose and have the effect of excluding specialized, and technology-oriented environmental firms while favoring pre-selected civil construction companies.
2. A minimum registration-age threshold is included as part of the qualification criteria rather than relevant project execution experience. This is in direct violation of World Bank Procurement Regulations as well as limits the ability of competent local firms to participate in the tender.
3. The Specific Construction Experience matrix mandates exact, high-volume benchmarks including:
 - Earthworks excavation of 1,000,000 m³ and compacted fill of 300,000 m³.
 - Continuous HDPE Water/Sewer Line (Min 200mm Dia) of at least 1,500 meters.
 - Grouted Riprap Works of exactly 5,000 m³.
4. These volume combinations are standard for multi-billion-rupee contracts and do not represent the engineering balance of an active environmental dumpsite capping envelope.
5. The SWEEP has forced an arbitrary 5,000 m³ grouted stone riprap requirement onto a landfill profile, which naturally relies on synthetic geomembranes and horizontal leachate line networks rather than river-barrage masonry, creating a pre-tailored framework designed to screen out environmental experts in favor of standard civil contractors.
6. The bidding documentation requires all members combined must meet requirements. By linking registration timelines and civil volumes as an absolute standalone pass/fail element, the PIU has effectively blocked specialized engineering firms from forming viable joint ventures, leaving the project exposed to severe execution and environmental risks.

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 World Bank Procurement Regulations mandate that bidding documents must not create conditions that restrict open and fair competition.
2. It may be noted that the Jam Chakro site, could hold potential for future landfill-gas capture and carbon market engagement, much like the Mehmood Booti dumpsite in Punjab, which has since moved forward as a carbon credit project.
3. If the current work is meant to support a future Article 6.2 or similar carbon initiative, then the integrity and transparency of this procurement matter even more. Any weakness at the contractor-selection or design stage now could affect the site's eligibility, credibility, or revenue potential later.



4. The PIU must conduct technical review of the BDS criteria, firms registration, and volumetric requirements against comparable dumpsite/landfill closure contracts, to ensure widest possible competition.

Transparency International Pakistan requests the Chief Minister Sindh to look into the allegations of the complaint and if found correct issue directives to update Bidding Documents in compliance with the World Bank procurement regulations.

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. Chief Secretary, Govt of Sindh, Karachi
2. Minister, Local Government & Housing Town Planning Department, Karachi
3. Secretary, Local Government & Housing Town Planning Department, Karachi
4. Project Director, SWEEP, Karachi
5. Managing Director, SPPRA, Karachi.
6. World Bank Integrity Unit
7. Registrar, High Court of 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”