



CITIZENS FOR  
A  
BETTER  
ENVIRONMENT  
(SHEHRI-CBE)

“Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it’s the only thing that ever has.”  
Margaret Mead

# SHEHRI

CITIZENS FOR A BETTER ENVIRONMENT

JANUARY - JUNE 2023

## NAVIGATING THROUGH DICHOTOMIES: THE MALIR EXPRESSWAY IN KARACHI

By: Fatima Ahtesham and Ashkan Fayyaz

In a world where progress and development often intertwine with environmental concerns and community welfare, the Malir Expressway project is evidence of how a project devoid of public engagement and initiated with a flawed intent and distorted priorities can shape the course of urban transformation. In the bustling city of Karachi, the Malir Expressway is a testament to the intricate interplay between politics, economics, and ecology. Therefore, it is essential to delve into the multifaceted aspects of the Malir Expressway project, from its political implications and connections to elite gated cities to its ecological impact and the potential for sustainable development.

This article explains its inception as a public-private partnership (PPP) endeavor to its recent reevaluation by the Asian Development Bank (ADB), shedding light on the power of dialogue and sustainable decision-making. Hence, in a dynamic interplay between development



aspirations and environmental preservation, the controversy surrounding the construction of the Malir Expressway in Karachi presents a complex web of legal battles, public concern, and the pursuit of sustainable progress.

**So is Malir Expressway an embodiment of Strategic Misrepresentation?**

Bent Flyvbjerg, a prominent

### INSIDE

The Role of Karachi...	P-06
No Transparency...	P-08
Institutionalised Land...	P-12
Civil Society Joins Hands...	P-16
Plastic Pollution...	P-19
The Killer Factories...	P-21
Empowering Women...	P-22
Mera Hunar Mera Kaam...	P-24

**SHEHRI - CBE**

88-R, Block 2, P.E.C.H.S,  
Karachi 75400 – Pakistan.  
Tel/Fax: +92-21-34 53 06 46  
E-mail: info@shehri.org  
URL: www.shehri.org

**EDITORIAL**

Shehri-CBE Team

**MANAGING COMMITTEE****Chairperson:**

Sameer Hamid Dodhy

**Vice Chairperson:**

Saleka Enver

**General Secretary:**

Amber Alibhai

**Treasurer:**

Amra Javed

**Members:**

Danish Azar Zubay  
Mohammad Ali Rasheed  
Engr. Parvez Sadiq

**SHEHRI STAFF****Coordinator:**

Sarwar Khalid

**Assistant Coordinator:**

Mohammad Rehan Ashraf

**Accounts Consultant:**

Irfan Shah

**Office Staff:**

Khursheed Ahmed

**SHEHRI Founding Members**

1. Mr. Kalid Nadvi (Economist)
2. Barrister Qazi Faez Isa
3. Ms. Humaira Rehman (Architect)
4. Mr. Danish Azar Zubay (Architect)
5. Mr. Navaid Husain (Architect)
6. Barrister Zain Sheikh
7. Dr. Kaiser Bengali (Economist)

**CONTRIBUTIONS ARE WELCOME**

Please contact the SHEHRI office for writers guidelines.

Views expressed herein do not necessarily express the views of the Editor/Editorial Board.

**PRODUCTION:****Saudagar Enterprises**

Web: www.saudagar.com.pk  
Ph: 021-34152970, 0333-2276331

**SHEHRI-CBE**

Acknowledges the support of the Friedrich-Nauman Foundation For Freedom for the printing of this newsletter

Danish academic specializing in the domain of megaproject management and strategic planning, has notably introduced the concept of 'Strategic Misrepresentation.' This conceptual framework elucidates the proclivity of project proponents to present a predisposition towards sanguine appraisals concerning the fiscal, utilitarian, and hazard-related facets of their undertakings. The developmental trajectory of the Malir Expressway conspicuously exemplifies the manifestation of this 'Strategic Misrepresentation' phenomenon. The Malir Expressway, emblematic of this phenomenon, of how the calculated underrepresentation and disregard of environmentally consequential facets and societal imbalances can engender the dissemination of erroneous and

fragmentary information to both the general populace and decision-making entities.

Flyvbjerg's theoretical tenets underscore the imperative of an analytical framework that transcends purely financial parameters, encompassing socio-cultural and environmental dimensions. Within the contextual purview of the Malir Expressway, an all-encompassing cost-benefit evaluation necessitates the discerning assessment of not solely pecuniary advantages and vehicular amelioration, but also the prospective ecologic degradation, uprooting of local communities, and the propagation of societal iniquity that is intrinsic to the project's execution. The exclusion of these multifaceted considerations precipitates a

**May 2020**



**June 2022**





distortion of the decisionmaking paradigm, rendering it conspicuously one-sided and ostensibly skewed in the perception of the project's holistic ramifications.

**Urban Segregation and Infrastructure: Decoding the Malir Expressway's Class Divide** The Malir Expressway project stands as a palpable embodiment of the class divide inherent in the urban development landscape of Karachi. The very trajectory and intent of this project underscored the prevailing socioeconomic disparities that often intersect with infrastructural endeavors. First and foremost, the project's alignment and connectivity paint a vivid picture of this class divide. Originally envisioned to improve traffic flow and connectivity, the Malir Expressway project was set to provide a six-lane all-weather road built to international highway standards, complete with bridges, culverts, and underpasses. The road's trajectory connecting affluent gated communities raised eyebrows, sparking discussions about the social divide and economic stratification. The project seems to connect only the elite gated communities (DHA, Bahria Town, and Education City-still under construction). The project casually ignores the repercussions of this development on the Malir River, the agriculture of Malir, and overall, on the ecology of Karachi. Hence, the expressway caters primarily to the elite,

reinforcing the divide between those living within these gated enclaves and the broader population of Karachi. This led to debates on equitable urban development and the need for infrastructure projects that benefit all strata of society.

Furthermore, the project's initiation without substantive public engagement perpetuates a narrative of decision-making that sidelines the interests of marginalized communities. The lack of inclusivity in the planning phase deepens the divide, as those residing within the gated enclaves exert a disproportionate influence on the development trajectory, leading to infrastructural choices that are tailored to their preferences, often at the expense of the broader populace.

The environmental and ecological dimensions of the project similarly illuminate the class disparity prevalent in urban development. The neglect of environmental impacts, indigenous communities, and delicate ecosystems effectively underscores the priority given to the convenience and aspirations of the affluent, potentially marginalizing vulnerable populations that rely on these ecological resources for their livelihoods.

The Malir Expressway's contentious narrative, marked by legal battles, public concern, and a reassessment by international bodies, underscores the power

dynamics at play in urban development. The project's trajectory reflects an urban landscape where the privileged wield substantial influence, steering the direction of infrastructure development to cater to their needs while the less privileged are left grappling with the ramifications. The Malir Expressway serves as a stark emblem of the complex web of class disparities woven into the fabric of urban development in Karachi. It is a tangible example of how infrastructural projects can inadvertently deepen the chasm between social strata, perpetuating a model of development that caters to the privileged while leaving the marginalized to contend with the consequences. This underscores the dire need for more inclusive and equitable urban planning processes that prioritize the well-being and aspirations of all segments of society.

### **Verdict of the Sindh Environmental Protection Tribunal, Karachi<sup>1</sup>**

On April 15, the Sindh Environmental Protection Tribunal, Karachi made a significant decision, allowing construction work on the Malir Expressway to proceed in the interest of the public. However, the approval was not without conditions. The tribunal mandated adherence to around 30 conditions, including addressing concerns related to urban flooding, transparent land acquisition, and the well-being of affected individuals. This ruling signified a pivotal

<sup>1</sup>Residents vs. Sindh Environment Protection Agency and Malir Expressway Limited, (2022). In the Sindh Environmental Protection Tribunal, Karachi.

moment in the project's trajectory, but it also ignited further legal challenges. While the tribunal's conditions aim to address environmental concerns, the legal clash underscores the complexities of ensuring sustainable progress in an urban landscape.

Undeterred by the tribunal's verdict, concerned residents embarked on a new legal journey. They petitioned the Sindh High Court (SHC), seeking a declaration of the Malir Expressway as an adverse environmental project. The residents argued that the project's approval process had disregarded essential regulatory principles, including the absence of consultation with the advisory committee as mandated by the Sindh Environmental Protection Act, 2014. The legal battle has unveiled a series of issues that have sparked debate. Residents, led by Ahmed Shabbar and Abdul Qayoom, represented by lawyer Zubair Abro, contended that the Environmental Impact Assessment (EIA) approval was granted without proper authority. They highlighted alleged procedural lapses, including the initiation of construction before the EIA hearing and a change in the firm responsible for the project.

#### **Voices of Concern:**

#### **A Catalyst for Change: Asian Development Bank Decision<sup>2</sup>**

The narrative surrounding the Malir Expressway took a significant turn when residents, raised concerns about environmental impact,

involuntary resettlement, and climate change. These voices of concern reached the ears of the Asian Development Bank (ADB) through the Office of the Special Project Facilitator (OSPF), leading to a thorough review of the project's implications. Acknowledging the importance of community engagement and addressing stakeholder concerns, OSPF determined the complaint to be eligible for problem-solving, initiating a dialogue between the complainants, the Government of Sindh Province, and the ADB project team. This demonstration of accountability and transparency exemplifies the role of international financial institutions in fostering responsible development. As the Malir Expressway subproject ceased to be an ADB-assisted project, it signifies a pivotal moment in Karachi's development narrative. The engagement between stakeholders, NGOs, and international bodies such as the ADB underscores the significance of voicing concerns and advocating for sustainable, climate-resilient projects that benefit both the environment and communities.

#### **Balancing Progress and Protection: The Malir Expressway Project's Environmental Dilemma**

Progress often comes at a cost, and the ecological impact of the Malir Expressway has not been without controversy. The construction of the project's 38.75-kilometer corridor invariably disrupts natural habitats and indigenous communities in Malir and

adjacent areas that rely on these ecosystems. The affected habitats are but not limited to urail, vultures, ibex, desert jird, small Indian civet, Indian hare, golden jackal, skink red tail, small Indian mongoose, monitor lizard, rough scale sand boa, common shelduck, Eurasian curlew, pallid swift, forest wagtail and more. Some of these species are exclusively found in Malir, Karachi.

Hence there are concerns over the potential displacement and extinction of rare animal species with marginalization of indigenous communities, highlighting the delicate balance between development and preservation. The criticism surrounding the Malir Expressway does not inherently oppose development; rather, it calls for a more conscientious approach. Sustainable development emerges as a potential solution, advocating for infrastructure projects that minimize ecological harm while fostering economic growth. Integrating green spaces, wildlife corridors, and community engagement into the expressway's design can help mitigate its impact, setting a precedent for future projects in Karachi and beyond.

#### **Redirecting Sindh Government Funds for Environmental Conservation and Restoration: A Pathway to Equitable Progress:**

The Malir Expressway project envisioned as a transformative corridor, has become a focal point of contention. As construction advances at a rapid pace, a legal tussle has





erupted between civil society, the construction firm M/s Malir Expressway Limited, and the provincial government of Sindh. The core of the dispute centers on the project's environmental impact and its alignment with regulatory standards. The inception of the Malir Expressway project was not solely rooted in the realm of urban planning; it also carried a distinct political narrative.

Amidst the complexities exemplified by the Malir Expressway project, the Sindh Government has a pivotal opportunity to reorient its financial allocations towards environmental conservation and restoration. By strategically channeling funds, the government can foster

sustainable development while addressing ecological imbalances and socioeconomic disparities. Allocating resources for the rehabilitation of ecosystems, protection of biodiversity, and promotion of green infrastructure can rectify environmental degradation while promoting community well-being. Embracing this approach demonstrates a commitment to both equitable progress and environmental stewardship, ensuring that urban development is harmonized with nature and benefits all segments of society.

#### **Conclusion-Closing the Chapter: The Path Forward**

The Malir Expressway encapsulates a complex narrative encompassing

political motivations, urban dynamics, ecological concerns, and aspirations for sustainable progress. As Karachi continues to evolve, this project serves as a reminder that development should not be divorced from equity, ecological preservation, and the well-being of all citizens. The dichotomy between progress and sustainability can be reconciled through thoughtful planning, cooperation, and a shared commitment to shaping a vibrant, inclusive, and ecologically conscious urban landscape. The story of the Malir Expressway project offers a testament to the power of dialogue, transparency, and collaborative decision-making involving international bodies such as ADB.

## THE ROLE OF KARACHI PARKS AND GREEN SPACES IN CLIMATE CHANGE MITIGATION

Sameer Hamid Dodhy



In this edition of our newsletter, we emphasize the utmost importance of saving parks and green spaces in Karachi for climate change mitigation. As our city grapples with the challenges brought by a rapidly changing climate, the preservation of these natural areas becomes a critical component of our collective efforts to mitigate and adapt to the impacts of climate change. Let us consider why saving parks and green spaces should be prioritized as a top agenda:

**1. Carbon Sequestration:** Parks and green spaces act as carbon sinks, absorbing carbon dioxide (CO<sub>2</sub>) from the atmosphere through the process of photosynthesis. Trees, plants, and green areas play a vital role in mitigating greenhouse gas emissions, reducing the concentration of CO<sub>2</sub> and other harmful pollutants in the air.

**2. Air Quality Improvement:** Trees and vegetation in parks and green spaces help filter and purify the air by absorbing pollutants and releasing oxygen. They reduce the levels of harmful gases, such as nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM), thereby improving air quality and promoting a healthier environment for residents.

**3. Heat Island Effect Reduction:** Urban areas, including Karachi, often experience the heat island effect, where temperatures are higher compared to surrounding rural areas due to extensive concrete and lack of vegetation. Parks and green spaces provide natural cooling through evapotranspiration, reducing

local temperatures and mitigating the urban heat island effect.

**4. Storm water Management:** Parks and green spaces serve as natural storm water management systems by absorbing and slowing down the flow of rainwater. They help prevent flooding and erosion by allowing water to infiltrate the soil, replenishing groundwater reserves and reducing the burden on drainage systems.

**5. Biodiversity Conservation:** Parks and green spaces provide habitats for diverse plant and animal species, contributing to the preservation of biodiversity. Biodiversity is essential for ecosystem resilience and provides crucial ecosystem services, such as pollination and natural pest control, which are vital for sustainable agriculture and food security.

### Preserving Parks and Green Spaces in Karachi:

#### 1. Protecting Existing Parks:

It is essential to safeguard existing parks and green spaces from encroachment, illegal occupation, and development projects that threaten their existence. Strict enforcement of environmental laws and regulations is necessary to ensure their long-term preservation.

**2. Reclaiming Illegally Occupied Spaces:** Efforts should be made to reclaim parks and green areas that have been illegally occupied and converted for other purposes. The preservation of these designated green spaces will not only benefit the environment but

also provide recreational opportunities for the public.

**3. Expanding Green Infrastructure:** Along with protecting existing parks, there is a need to create new green spaces and promote green infrastructure within Karachi. This includes planting trees along streets, establishing community gardens, and integrating green spaces into urban planning to enhance the city's resilience to climate change.

**4. Community Participation:** Engaging communities and fostering a sense of ownership and responsibility towards parks and green spaces is crucial. Encouraging community involvement in maintenance, tree planting drives, and awareness campaigns can promote a culture of environmental stewardship.

We must prioritize the preservation of these invaluable natural assets and take resolute actions to protect and enhance them within the bounds of our beloved Karachi. Together, let us unite and unleash the power of collective action to forge a greener future.

It is our duty, our responsibility to nurture and safeguard these oases of life, ensuring that they flourish and thrive. For in doing so, we breathe life into our city, infusing it with vitality, resilience, and hope. Let us work hand in hand, tirelessly striving to create a greener and more sustainable Karachi, a sanctuary where nature and humanity coexist in harmony.



**Meezan Bank**  
The Premier Islamic Bank

Meezan Bank has received the

**Best Digital Offering in Pakistan award**

by Islamic Finance News (IFN) Best Bank Awards 2022!



**IFN**  
*Awards*  
BEST BANKS  
2022



## NON TRANSPARENCY, THE BENEFIT OF STEALTH - GAZETTE NOTICES [SBCA REGULATION: CHAPTER 24-PARKING REQUIREMENTS]



### Karachi Building & Town Planning Regulations (KB&TPR) 2002

Being transparent is not a weakness, but actually strength at core level. The principle of transparency requires that any information addressed to the public or to the data subject be concise, easily accessible and easy to understand, and that clean and plain language and, additionally where appropriate, visualization be used.

Transparency in government is the governing doctrine which maintains that citizens have the right to access the documents and proceeding of the government to allow for effective public oversight.

What is stealth: It can be something done quietly to avoid notice, done in secret, for example you plan a birthday party by stealth then the guest of honor will be pleasantly surprised, it is a skill to avoid notice.

Stealth can also be applied to activities or actions that are carried out discreetly or covertly, without drawing attention or raising suspicion. This can include secret missions, undercover operations, or clandestine activities.

Gazette Notices are official announcement or publications made by government or regulatory bodies. The notices are typically published in the Gazette, an official government publication. Gazette Notices can contain important information such as new laws or regulations, public notices, and official appointments.

The government Gazette is used by the government as an official way of communicating to the general public. The Gazette includes proclamations by the

President as well as both general and government notices made by its various departments.

The Sindh Building Control Authority (SBCA) has however become very adept at being non transparent and using stealth to approve amendments and gazette them. They are encouraged by their handlers, who cherish, admire and patronize these attributes.

- Before the promulgation of Sindh Building Control Ordinance (SBCO) in 1979, the functions relating to building & town planning activities in Karachi were assigned to different agencies, in different times.

- Therefore in the year 1979, the Govt. of Sindh promulgated Sindh Building Control Ordinance 1979. Its objective was "An Ordinance to provide for the regulation of the (town) planning, construction, control and demolition of buildings and disposal of buildings and plots in the Province of Sindh". It preamble states that '*whereas it is expedient to regulate the planning, quality of construction and buildings control, prices charges and publicity made for the disposal of buildings and plots by builders and societies and demolition of dangerous and dilapidated buildings in the Province of Sindh*'.

- In the SBCO 1979, provisions were made to regulate the building activities as well as sale of units to the general public through the licensed professionals. The spirit behind the creation was to:

1. Ensure the stability of

structures.

2. Keep quality control in the construction activities.
3. Regulate the building and town planning Regulations.
4. Safeguard the interest of general public.

For our understanding of the use of non transparency and stealth, these three (03) sections of the SBCO 1979 are important.

**1) Section 4-A, Sub Section (2)** of Sindh Building Control Ordinance 1979, states that all officers, advisers, experts, consultants, and employees appointed under sub-section (1) shall be deemed to be public servants within the meaning of section 21 of the Pakistan Penal Code (Act XLV of 1860) and shall be subject to such disciplinary action as may be prescribed **[They have forgotten their real status]**.

**2) Section 4-B** of Sindh Building Control Ordinance 1979 "**Supervision over the Authority**" - Government may appoint a Committee which may subject to the control and direction of Government oversee the functioning of an Authority.

- *It has never been in the interest of governing authorities i.e. Chief Minister, Chief Secretary, Secretary HTP/LG, and the officers of KDA/SBCA to have a strong functioning Oversee Committee and last but not the least, the political parties themselves, and their patrons the builders.*

- *By not having an Oversee Committee, the DG SBCA is a puppet in the hands of his handlers, this allows the handlers to enforce amendments*

and changes in the Rules and Regulations at will, for the benefit of a few.

**3) Section 21** - Power to make rules: Government may, make rules for the purpose of giving effect to provisions of this Ordinance.

**Section 21-A 'Regulations'** (1) The Authority may, frame Regulations not in consistent with the provisions of this Ordinance and the rules make thereunder, for carrying out the purposes of this Ordinance. This section had 12 subsections, and in 2014 an addition made it 13. **[Sections 21A inserted by the Sindh Building Control (Amdt) Ordinance 1982 {Ord. No.III of 1982}, the Sindh Govt. Gaz. Extr., Pt. 1, dt. March 6, 1982].**

(2) In particular and without prejudice to the generality of the foregoing power, such regulations may provided for;

A) The recruitment, tenure of office, terms and conditions of service of the officers, advisers, experts, consultants and employees appointed by the Authority and disciplinary action against them;

B) The manner of approval, grant of no objection certificates to builders or developers and rates of fees therefor;

C) The manner of grant of occupancy certificate and fees therefor;

D) The manner of attestation of documents or information;

E) The manner of preparation, supervision and submission of building plans;

F) The qualifications, manner of grant and terms and conditions of and fees for licences to architects, building designers, inspecting engineers, inspecting architects, building supervisors, structural engineers or town planners and regulation of their functions and

remunerations;

G) The manner of grant and terms and conditions of licence to builders or developers and fees for such licences;

H) Procedure for cancellation of transfer or sale;

I) The details of the building or plot required to be mentioned in the advertisement for its sale by the builder or developer, as the case may be;

J) Rates of fees for supplying copies of any document or information;

K) Terms and conditions of compounding of offences;

L) Rates of interest payable under this Ordinance.

In 2014, a further subsection **(KK) 'Framing of Town Planning Regulations'** [this was added in Section 21-A, vide the Sindh Govt. Gaz., Extr., Pt IV. P.No.82, dt. Karachi the 20<sup>th</sup> March 2014].

The 2014 addition was the first step towards legal and regulatory corruption.

This small innocuous amendment has played havoc with the environment of Karachi and Sindh. This has allowed the builders, big and small to have fully captured the regulatory authority and the public servants who are posted therein, from the top public servant to the lowest. This has allowed non transparency, stealth and corruption to be rampant in changing the Karachi Building & Town Planning Regulations (KB&TPR) without public oversight and input.

### **Karachi Building Control Authority (KBCA)**

In 1979, an authority the Karachi Building Control Authority was created under Section 4 of Sindh Building Control Ordinance 1979 and both KDA and KMC areas were brought under the

jurisdiction of KBCA. In October, 1991, the KBCA was again bifurcated into two factions i.e. KBCA(KDA) and KBCA(KMC). It is the prime regulatory body of Karachi and Sindh.

In April, 1996, KBCA(KDA) and KBCA(KMC) were re-unified. Director General, KDA was notified as its Chief Executive. KBCA has its jurisdiction over entire Karachi Division excluding Cantonment areas and SITE.

On 14<sup>th</sup> February 2011, the Sindh Building Control Authority (SBCA) was established and its jurisdiction was extended to whole of Sindh. The five Regions of Sindh Building Control Authority were established which are Karachi, Hyderabad, Mirpurkhas, Sukkur and Larkana, having the Head Quarter at Karachi.

Fundamental essence of the Authority remains the same i.e. to regulate building activities as well as sale of units to the general public through licensed professional.

By not allowing section 4-B of the Sindh Building Control Ordinance 1979 to be followed. The SBCA with its handlers continues to play havoc with Karachi and its citizens. The SBCA only follows Section 21, 21-A and Sub Section 2(KK) "Framing of Town Planning Regulations" of the Sindh Building Control Ordinance 1979.

### **Karachi Building & Town Planning Regulations 2002 (KB&TPR)**

After the SBCO 1979, came the regulations, which are called the Karachi Building and Town Planning Regulations (KB&TPR). These regulations go back to 1961, 1979 and 2002.

Over a period of 18 years, made changes in the Karachi Building & Town Planning Regulations

(KB&TPR), pertaining to Parking Requirements and other important aspects of town planning without any public discourse and inviting public objections.

**Chapter - 24 of KB&TPR "Parking Requirements"**

In Karachi Building & Town Planning Regulations 2002, and from 1961 parking requirements has been present in all the regulations. In 2003 Parking Requirement was a mandatory clause to be filled out in the Public Notice for Change of Land use under the 'Change of Land use and Master Planning Bye Laws 2003' [this policy has torn Karachi environs from within)

After this exclusion from the Public Notice, all hell has broken loose in the built environment of Karachi after the exclusion of Parking Requirement from the Public Notice which was done in a non-transparent manner, with stealth. Changes in Parking requirements continue, this has ensured all subsequent Parking laws to be continuously fudged.

The second addition for fudging Parking Requirements was in November 26, 2010, when Regulation No.24-9 was added in the Parking Requirements (Chapter 24 of the KB&TPR 2002) vide Gazette Extr., Pt. 1A, P.No.34, dt. November 26, 2010. [This clause did not exist from 1961 till this insertion in 2010]. **Clause 24-9 was solely added to facilitate the builders and most especially Bahria Town Tower on Main Tariq Road (Plot No.172/C), to allow the rear residential Plot No.173/C to be used as a parking plaza.**

**"Clause 24-9" read as follows:**  
*"In case of minimum 3 additional public parking floors are proposed in addition to the required parking as per these regulations. An enhanced FAR upto a maximum of 50% of the additional proposed parking area shall be added to the allowable FAR having minimum plot area of 1000 sqyds and above. The additional Public parking may also allowed on the surrounding residential plot declared to be only parking plaza to the main project provided.*

- (i) The area of the residential plot shall be minimum 600 Sqyds.
- (ii) The minimum width of the existing lane between the project and surrounding residential plot shall not be more than 24'-0" wide.
- (iii) The parking plaza with the main project shall be linked

through a bridge on existing lane/road if any having a minimum height of 18-ft. from the existing lane road.

**[the wordings are customized to the requirement of Bahria Town Tower at Tariq Road. There is indeed a bridge linking the two plots at a height, Plot Nos.172/C and 173/C, Block 2, PECHS, Karachi].**

(iv) The provisions of Clause 25-1.8 and "Residential Building Bulk Standards" as mentioned in clause No.25-2 of KB&TPR-2002 along with its related other conditions shall not be applicable on surrounding residential plot i.e. parking plaza.

**[this was substituted by the Karachi Building and Town Planning Regulations (Amendments) 2013, Karachi the 19th March, 2013, the Sindh Govt. Gaz., Extr., Pt. 1, P.No.99 dt. March 28, 2013].**

**This was inserted to fully exempt the rear residential plot from its residential status illegally and comfortably allow the builders to take full advantage of rear plots then and in future which are attached to the front commercial plot (so easy to play around with Town Planning and Master Plan).**

(v) The basic requirement of parking shall be provided as per KB&TPR-2002.

(vi) Betterment charges shall be charged on the FAR including enhance area as prescribed by Authority from time to time, whereas Rs.50/- per Sq.Ft shall also be charged on the 50% of the area of parking plaza.

(vii) On residential plot the number of floors of the parking plaza shall not be restricted.

**[allowing unlimited height restriction which for residential plots is subject to rules etc]**

(viii) The road width for entrance to the parking shall be minimum 40 ft.

**SCHEDULE 3C -PUBLIC NOTICE FOR CHANGE OF LAND USE**

Notice relating to Change of Land Use shall conform to the format provided below.

**PUBLIC NOTICE**

Change of Land Use of Plot No. \_\_\_\_\_ Scheme \_\_\_\_\_ :

Mr. \_\_\_\_\_, owner of Plot No. \_\_\_\_\_ has applied to this Office for Change of Land Use of above plot from \_\_\_\_\_ to \_\_\_\_\_. The City District Government Master Plan and Environmental Control Dept. is examining the proposed conversion and its implications on the amenities and infrastructure. This conversion will result in the following changes to the currently applicable Lease Conditions and Zoning Regulations:

Condition	Current	Converted
Total Floor Area		
No. of Floors/Height of Building		
Compulsory Open Spaces		
Parking Requirements		
Usage of Building		

Anyone having any objections/comments/observations should file the same within 30 days from the date of publication of this notice to the undersigned. A public Hearing will then be held at the office of the undersigned within 5 days of the expiry of the above mentioned 30 day period or an extension thereof and all those having filed objections/comments/observations will be invited to present/explain their point of view. Master Plan & Environmental Control Department decision shall be final.

MP&ECD

This was done via public debate under 'Change of Land use and Master Planning Bye Laws 2003'

**92 THE KARACHI BUILDING & TOWN PLANNING REGULATIONS, 2002**

**Schedule - 3C  
PUBLIC NOTICE FOR CHANGE OF LAND USE**

Notice relating to Change of Land Use shall conform to the format provided below.

**PUBLIC NOTICE**

Change of Land Use of Plot No. \_\_\_\_\_ Scheme \_\_\_\_\_,

Mr. \_\_\_\_\_, owner of Plot No. \_\_\_\_\_ has applied to this Office for Change of Land Use of above Plot from \_\_\_\_\_ to \_\_\_\_\_. The [City District Government Karachi (CDGK)] [Master Plan Group of Offices (MPGO)] is examining the proposed conversion and its implications on the amenities and infrastructure. This conversion will result in the following changes to the currently applicable Lease Conditions and Zoning Regulations:

CONDITION	CURRENT	CONVERTED
Total Floor Area		
Deleted		
Deleted		
Deleted		
Usage of Building		

<sup>1</sup>The words "City District of Karachi" Substituted by the Notification No. SO (Land) (ITP / KBCS-3-9-290), dt. 29th October, 2002, the Sindh Govt. Gaz., Extr., Pt. 1A, P. No. 32, dt. October 16, 2008.

<sup>2</sup>The words "Master Plan & Environmental Control Department (MP&ECD)" Substituted, ibid.

<sup>3</sup>Chart substituted by the Karachi Building and Town Planning Regulation (Amendment) 2005, Karachi the 4th August, 2005, the Sindh Govt., Extr., Pt. 1A, P. No. 32, dt. September 5, 2008.

However this requirement was quietly done away vide Sindh Govt. Gaz. Extr. Pt. 1A, P.No.32, dt. September 5, 2008

**This was the 1<sup>st</sup> change**



(ix) The premises of the parking plaza shall not be used for any other purpose except parking and undertaking be submitted by owner/builder on stamp paper.”

**In clause 24-9, a further Sub-Section (ii) was added in 2019 vide Notification No. Chief Executive/SBCA/2019/03, Karachi the 13<sup>th</sup> June, 2019.**

(i) “In case of minimum 3 additional public parking floors

are proposed in addition to the required parking as per these regulations only on Commercial/Public use building having minimum 40 ft. wide facing road, an enhanced FAR upto a maximum of 50% of the additional proposed visitor parking area shall be added to the allowable FAR having minimum plot area of 950 sqyds and above. The additional public parking may also be

allowed on the surrounding residential plot facing 40ft. Side road declared to be only parking plaza to the main project provided”.

Now another change, non-transparent with stealth has been made. In June 2023, another amendment has been notified and this clause 24-9 (ii) vide Notification No. Chief Executive/SBCA / 2023 / 47, Karachi, 05 June 2023 has been reworded.

Sr. No.	Regulation No.	Existing	Proposed Amendment
1.	24-9 (ii)	“In case of minimum 3 additional public parking floors are proposed in addition to the required parking as per these regulations only on Commercial/Public use building having minimum 40 ft. wide facing road, an enhanced FAR upto a maximum of 50% of the additional proposed visitor parking area shall be added to the allowable FAR having minimum plot area of 950 sqyds and above. The additional public parking may also be allowed on the surrounding residential plot facing 40ft. Side road declared to be only parking plaza to the main project provided”.	“In case of minimum 3 additional public parking floors are proposed in addition to the required parking as per these regulations only on Commercial/Public use building having minimum 40 ft. wide facing road, an enhanced FAR upto a maximum of 50% of the additional proposed visitor parking area shall be added to the allowable FAR having minimum plot area of 850 sqyds and above. The additional public parking may also be allowed on the surrounding residential plot facing 40ft. Side road declared to be only parking plaza to the main project provided”.

The meaning of this amendment in simple language as an example is that, FAR means Floor Area Ratio. If FAR is 5 and Plot area 10,000 sqft, the builder can build 50,000 sqft to sell and 30% (17,000 sqft for Parking/amenities etc). Total he can build 67,000 sqft.

If builder is generous and wants to provide 3 extra floors for more amenities/parking his FAR can be increased by 50%. The builder can provide parking on original plot, but if he buys rear residential plot he can shift

parking there and use/sell original front building for commercial only.

However to further accommodate any future wishes, as per subsection (vii) of Clause 24-9, there is no restriction on the number of parking floors.

As in Bahria Town Tower at Tariq Road, PECHS Block 2, previously this law was for 950 sqyds (or above) area plot. Now proposed amendment allows it for 850 sqyds also, because the present two plots for whom this amendment has been done are smaller plots.

The facilitation target for this latest change are four (4) plots in Sindhi Muslim CH Society. Plot No.101 front and its rear Plot No.87 (both plots next door to a Girls Primary School) and Plot No. B-9

(facing Shahra-e-Faisal) and B-10 the rear plot.

This amendment has been introduced to pass specific benefit for specific builders. It does not matter what havoc it will inflict upon the neighbors, upon the residents, the amenities, the road users. It was not debated and it was done in closed room with the lights off in stealth and no transparency. When will this stop.

You need to understand that the Karachi Building & Town Planning Regulations 2002 (KB&TPR-2002) is in a corrupt free fall managed by the SBCA and its legal handlers and the builders. There is absolutely no transparency and complete and total corruption. Everyone is making money. The environment, the city and citizens can go to hell.

The KB&TPR has become a legal, institutionalized manual for corruption which can be changed at the drop of a few pennies.



## Institutionalised Land Grabbing: The Rehabilitation & Resettlement policy 2022

BY : HAWWA FAZAL



In 2020, Karachi received 484 millimetres (mm) of rain - the highest rainfall recorded in the 90 years. The rain left the city in a shambles and inoperable for the next few weeks, with clogged nullahs - the storm water drains supposed to transport the water from one end of the city all the way to the sea - cited as the primary reason for the urban flooding.

Weeks later, the provincial government reached out to the World Bank (WB), which in turn agreed to put up \$100 million for what came to be known as the Solid Waste Emergency and Efficiency Project (SWEEP). The goal was to improve solid waste management in the city, which also meant cleaning the debris from the storm water drains as well as clearing any illegal structures in their path.

At the same time, the Supreme Court of Pakistan, on Aug 12, 2020, ordered the National Disaster Management Authority (NDMA) to [assist the provincial government in cleaning the nullahs. Thus began the story of horror and agony for the residents of Gujjar Nullah and Orangi Nullah.

Soon after, the Karachi Metropolitan Corporation's senior director for land (anti-encroachment) issued a letter, titled "[cancellation of leases of plots coming in alignment of Gujjar Nullah and Orangi Nullah and other nullahs in Karachi city]". What is ironic is that the order itself was illegal, but it was ultimately used to cancel all leases, even the ones issued decades ago. The letter also did not take into account the actual width of the nullah, and the authorities ended up

demolishing homes that didn't necessarily impede the flow of water.

Within nine days of the letter being issued, the Central district's deputy commissioner issued a notice, informing the residents that the demolitions would start the next day at 7am. What each of these officials, as well as others involved in the 'anti-encroachment operations' failed to appreciate was that while the apex court had ordered the nullahs to be cleared of encroachments, it had also ordered the provincial government to rehabilitate the people who would be impacted by these operations.

"The Government of Sindh shall provide all the necessary assistance and support to the NDMA for rehabilitation of the people, the Government of Sindh shall ensure provision of all necessary facilities which is required for rehabilitation of a civilised society," reads the court order, in case you were wondering.

With no rehabilitation policy in

place, the affectees - many of whom held leases for the land they occupied - knocked on the apex court's doors once again. Again, the supreme court ordered the government to rehabilitate them. But it was already too late, with the World Bank suspending the funding for the project, ostensibly to avoid being embroiled in a controversy where thousands of people were being rendered homeless.

### Policy Discussions

It was at this point that the Sindh government rushed to make a rehabilitation policy, immediately constituting a committee chaired by the Karachi Commissioner.

The committee met for the first time on April 7, 2021, when the commissioner made two sub-committees. One was headed by Amber Alibhai, general secretary of non-governmental organisation, Shehri-CBE, while the other was headed by then KMC Municipal Commissioner Afzal Zaidi.

"When the anti-encroachment drives of 2020 took place, the



government realised that there should be a policy," said Zaidi, adding that the policy was being drafted to serve as a roadmap for the future, whenever there was displacement due to a development project.

Two years on, after multiple consultation sessions, the policy draft is still being debated upon. Meanwhile, anti-encroachment operations are in full swing and departments are preparing and sending out more notices to more people who will have to be evicted to make way for 'development projects'.

As for the other sub-committee, it lost its chairperson within a few months. "I resigned as the chairperson of the sub-committee on Nov 10, 2021, because the commissioner's office was not engaging us in a meaningful way," Alibhai said.

### **The Fault in Our Laws**

When the state wants to acquire private land, it looks to the archaic Land Acquisition Act (LAA), 1894, enacted by the British some 119 years ago. The law's primary purpose was to facilitate the government's acquisition of privately held land for public purposes and for private companies - by paying a small compensation fee.

Unfortunately, even after all these years, the law still prevails in Pakistan. The policy draft, currently in circulation, acknowledges the faults in the law, but does little to address them.

"The Land Acquisition Act, 1894, remains a remnant of the colonial times that should have been timely amended to cater to our evolving socio-economic circumstances," the policy draft states. "Therefore, such an

overhaul becomes necessary in the light of the shortcomings of the current scheme of land acquisition with respect to compensation and matters incidental thereto."

Alibhai explained that the law essentially opened up several avenues for the government to take over any land by paying peanuts. "Under the current law, public purpose can be anything such as an educational institution, a housing scheme, a healthcare facility or slum clearance. It allows the government to acquire any land for a private company without being questioned," she said.

Land acquisition for the Ravi Urban Development Authority (RUDA) project is one such case where the law was allegedly misused to take land from a local community - under the guise of development - to benefit a select few.

According to lawyer Abdul Rafay, "the definition of public purpose in Land Acquisition Act (LAA), 1894 is vague, because of which the government can acquire a private person's land for a private company, without being questioned." Rafay is part of the Alternative Law Collective, a research, litigation and advocacy group comprising lawyers and academics.

As per the procedure laid out by the law, the government is required to listen to and take into consideration the objections of the people inhabiting the land. In most cases, however, Clause 17 of the LAA [special power in cases of urgency] is invoked, enabling the government to take over any land without listening to any objections of the local people.

The policy draft, being

considered in Sindh at the moment, does not really address any of the issues arising out of the application of the LAA. It only makes fleeting references of avoiding, minimising and exploring alternative options - where feasible. It also introduces no standard, criteria or mechanisms for accessing the feasibility in practice, particularly when it comes to the question of taking land for public purposes and under the urgency clause of the LAA.

"The LAA, 1894, needs to be repealed and until that happens, the resettlement policy will hold no value," Rafay added.

### **Ambiguities and Absence of Legal Cover**

Another point of contention with the policy draft is its vague wording. "The policy [draft] takes reference from multiple laws but does not define which sections or clauses of the aforesaid laws would be used," said Alibhai, adding that this ambiguity could be used for mala fide purposes.

What is perhaps the biggest point of contention is that the policy has no legal cover, with the provincial government justifying that "the policy does not need explicit legal cover through legislation since it clarifies principles enshrined in other laws ..."

According to environmental lawyer, Advocate Zubair Abro, if the policy has no legal cover, resettlement and rehabilitation will not be a right of the people. It needs to be made a right or the displaced will be left at the mercy of the government. "If there is no legal cover, we cannot challenge it in writ petition because it is just a policy, and cannot approach any court for enforcement



because it is unenforceable," said Abro. Citing the example of Thar Coal, he said that despite having a resettlement policy framework, only a few affectees have had recourse to the entitlements, while the majority have been left unprotected. "Thar Coal Block 2 was developed in 2016 but to date, we have seen little to no compensation," said Leela Ram, an affectee of Thar Coal. The compensations have been denied, restricted, delayed, incomplete and given favourably.

If the policy is turned into a law, there will also be a mechanism under which each government official and department will be given a responsibility. Those who do not fulfill their responsibility or discriminate can be held accountable.

The Sindh government, however, denies there is any mala fide intention to any of this. "If we wait for amendments to the law, it's going to take time," said Faisal Ahmed Uqaili, Secretary to Government of Sindh, Planning and Development Department.

"The laws that are relevant to this policy should be amended but the deliberations to those amendments will come from the implementation of this policy on the ground ... the policy will be the first stepping stone," he added.

### **Unequal Treatment**

According to experts, the current policy draft is also discriminatory towards the affectees.

It states: "While resettlement is the preferred approach from a sustainable development perspective, cash compensation based on entitlements, can also be provided if preferred by eligible

persons and/or required by government due to the contextual reasons (non-availability of resettlement sites and/or land and/or resources for developing new resettlement sites that are or can easily be connected to sources of livelihood and provided requisite services). "The decision to provide resettlement or cash compensation may be done on a case-by-case basis."

While giving the affectee the right to choose the compensation they desire is vital, giving the government discretionary power to make that decision without defining 'guidelines' would lead to discrimination, say experts. It would be an injustice to those who get the less desirable remedy.

"The entitlement matrix is incomplete and flawed ... it fails to take the current scenario on the ground into context," said Syed Zainuddin, director of Alternative Law Collective. He said that the on-ground issues are complex. Generations have been born and lived in places, which the government wants to acquire, in the last several decades. The people have their own customs, history, traditions, way of life and livelihood practices.

Zainuddin added that the Sindh government had never shown any interest in getting the people the required documentation. "Today, when they have interest in the land, they're asking them to prove their ownership based on legal documentation?" he questioned rhetorically.

Based on those papers, the government is making distinctions between which affectee deserves what type of compensation, he said. The title-holder and the non-title

holder both are losing their economic and social status-in equal measure. "How will they do justice when they only rehabilitate one of them? The value of any rehabilitation and resettlement policy is restitution of the people. This policy is failing to achieve that," he stressed.

### **Generational Customs and Communal Spaces**

The entitlement matrix too does not take into account the customary practices of the areas. "Each region has a distinct socio-economic reality in which people have lived for centuries. They had their own set of rules and regulations," said Rafay.

For instance, the agricultural land owners, who have title deeds, will be given land for land. It, however, fails to incorporate the landless farmers, who are in the majority and will be affected the most.

In rural Sindh, the 'makata' practice is followed in which the wadera (landowner) gives the landless farmer the land for the season or the year. The tenant lives on the land and cultivates it. The profit from the yields is then shared by both the land owner and the tenant.

Rafay explained that the matrix states the tenant will be given 'cash compensation of a value proportional to the remaining tenancy period or three months'. "This is gross injustice," he said. "What will he do after three months?"

What the policy draft fails to appreciate is that the pre-displacement status includes not just tangible private assets, but also communal resources and aspects of cultural life and livelihood practices.

“Where displacement and/or social and economic impacts are unavoidable, to provide adequate compensation, resettlement and rehabilitation assistance and support to affected people and communities can at least maintain their pre-displacement socioeconomic status or improve their overall well-being due to new opportunities made available to them,” reads the draft.

“In Thar, there was a dedicated piece of land which was called ‘gaon-char’, on which the entire community’s livestock would graze,” said Noor Bajeer, CEO of Civil Society Support Programme. “If you take that away, you’re taking away an essential resource of the community.”

“Similarly, there are many other communal resources that need to be taken into account when rehabilitating and resettling the people ... the current policy is failing to do so.”

**Haste Makes Waste**

While many point to the contradictions in the draft, renowned Architect/Town

Planner Arif Hasan believes it is simply hogwash. “It seems to me that the policy is being made so that the government can keep taking loans from the World Bank,” he said.

Hasan explained that all policies have a background paper, which is very detailed and made after consultations from all provinces, districts and communities. It takes years to conduct those consultations and reach a consensus with the community.

According to Uqaili, the Sindh government has undertaken all efforts to consult as many stakeholders as possible. He explained that the policy draft has been uploaded on the respective websites of three different government departments. It has also been translated and advertised in regional languages, as well as Urdu, and the recommendations received are being compiled.

Moreover, said Uqaili, there have been multiple consultation sessions. “The civil society is even holding some consultation sessions to make their recommendations

stronger,” he said, adding that once the policy was implemented, it could always be amended to fill the gaps.

Again, not everyone is convinced. “Each community that lives in the area has its own customs, cultures and history. Without taking all of this into account, how can the government make a policy?” questioned Abira Ashfaq, a lawyer and activist affiliated with Karachi Bachao Tehreek (KBT), which describes itself as an “evolving and growing movement of demolition affected people and their allies in Karachi.”

Bajeer agrees with Ashfaq, “the policy is being made in consultation with academics ... the real beneficiaries of the policy are unaware of it,” he said. “The policy needs to be delayed, it cannot be hurried to fulfill the formalities of the donor agencies and banks. The policy is for all of Sindh and will rehabilitate people who are affected by all forms of displacement, be it climate change, anti-encroachment or development projects. It needs more deliberation.”



Again, Uqaili disputed this notion. “The policy is not for flood affectees... the government has different projects and provisions for them. It is also not for the

displacement of affectees displaced before the effective date of policy implementation,” he said. According to Uqaili, back in March, the policy would

be presented to the cabinet for discussion and approval. There seems to be confusion all around, and we can safely conclude that it is simply land grab.

# CIVIL SOCIETY JOINS HANDS AGAINST CLIMATE CHANGE



People gathered in Karachi on 16<sup>th</sup> July 2023 to protest against climate injustice, demanding proper action to address climate change. The Climate March started from Frere Hall while passing through the Governor House and culminated at the Karachi Press Club.

Protesters carried signs criticizing the government, its mismanagement of the climate crisis, while placards emphasized the importance of a clean city and a healthy future. Despite having a low carbon footprint, Pakistan remains vulnerable to the effects of climate change, as evidenced by the devastating floods experienced last year.

Activists and organizers pointed to how local authorities were seemingly unable to prevent climate disasters such as floods, heavy rainfall and extreme heat and how their own development projects are exacerbating environmental harm. Others pointed to how pollution from plastic, sewage



and industrial waste and irresponsible construction was damaging the Indus Delta and its communities and criticized the national obsession with Thar coal in an era where the world is moving or must move towards renewable energy. The Malir Expressway project in particular came under intense scrutiny, with calls for the project to be abandoned as it is a cause of ecological damage and is not benefiting local residents.

**“They are unable to save us**

**from climate disasters such as floods, heavy rainfall, urban floods or heat,”** said climate activist and Climate March organiser Yasir Husain aka Darya.

Salman Baloch, a participant hailing from Malir, called attention to the negative environmental impacts of the construction of Bahria Town, Malir Expressway and the Defence Housing Society (DHA) in the periphery of Kirthar National Park.

While speaking about the consequences of the Malir Highway, Baloch said, “We used to see so many birds in Malir. There were parrots, cranes and butterflies there. But, sadly, the greed in people let them only eye the land there.”

He emphasized the terrible conditions of the River Indus which has been affected by solid pollutants.

“The Indus Delta has been destroyed by plastic garbage







and sewage mixed with industrial waste, and reckless development on wrongfully 'reclaimed' coastal lands," said Baloch.

Transgender rights activist Hina Pathani aka Surkhina said that nature should not be meddled with. In the name of cleanup efforts, Pathani advised people to "first clean their hearts and minds."

The transgender community

was uprooted by the floods last year, particularly in Punjab and Khyber Pakhtunkhwa, she said, adding that the displaced people arrived in Karachi at that time, but the government has yet to offer assistance in their rehabilitation. She said that affectees were forced to seek shelter on their own in the slums, where the locals were as resistant to accepting them.

A majority of participants of Climate March 2023 were

women, transgender people, fisherfolk and indigenous peoples. The presence of marginalized communities strengthened the manifesto of the march.

Climate change is a larger threat to women and minorities residing in Pakistan. An international study has found strong links between climate change and incidents of violence against women, particularly in South Asian countries.





The research concluded that each 1°C increase in the annual mean temperature contributed to a mean increase of 4.49 per cent in the prevalence of violence against women.

Pakistan is one of the most vulnerable countries to climate

change even though its carbon footprint is not significant compared to the developing world.

Devastating floods submerged large parts of Pakistan last year, leading to a renewed emphasis on fighting the effects of climate change and improving

preparedness.

Apart from raising awareness and calling for more action from the government, the march on Sunday also called for more proactiveness from the government over flood reconstruction efforts.

# PLASTIC POLLUTION

Saleka Enver



A historic resolution (resolution 5/14) was adopted in February 2022 at the resumed fifth session of the United Nations Environment Assembly (UNEA-5.2) with the goal of concluding the negotiations by the end of 2024. The resolution calls for the development of an international legally binding instrument on plastic pollution, including in the marine environment.

Plastic pollution is a severe global environmental problem that has an adverse effect on sustainable development's environmental, social, economic, and health facets. The amount of plastic garbage entering aquatic environments might nearly quadruple from 9 to 14 million tonnes per year in 2016 to an estimated 23 to 37 million tonnes per year by 2040 under a "business as usual" scenario and in the absence of critical actions.

Every year, 400 million tonnes of plastic garbage are produced, of which 288 million tonnes-up to 70% of the total-come from municipal solid waste streams. Furthermore, the majority of the most underdeveloped metropolitan regions are where uncollected waste contributes to plastic pollution.

Biodiversity is seriously threatened by plastic pollution. The ability of ecosystems, animal, and plant species to

provide vital services to humanity is threatened. While the effects of plastic pollution on marine life and the ocean's following effects have received the greatest attention, freshwater and terrestrial ecosystems are also impacted by plastic pollution. In fact, there may be plastic and chemical leaks into the environment at different stages of the plastics life cycle, and the resulting contaminants are spread throughout the world by air and ocean currents.

Over the past few years, there has been a steady rise in the manufacturing and consumption of plastic on a global scale. Since most plastic is either discarded in or ends up in the waters, marine life is finding the oceans increasingly uninhabitable. The pollution caused by non-biodegradable plastic, which has no boundaries, has been elevated to a top issue for humanity due to the amount of waste that is continually generated.

Plastic pollution is a major environmental problem in Pakistan. The country generates around 20 million tons of plastic waste every year, and much of it ends up in landfills or the ocean.

One of the main sources of plastic pollution is the lack of proper waste management systems. Many areas of the

country do not have access to regular waste collection services, which leads to plastic waste being dumped in open areas, waterways, and other natural areas. This can lead to a range of problems, including the spread of disease, the contamination of water sources, and the destruction of wildlife habitats. Another source of plastic pollution is the use of plastic bags and other single-use items. These items are often discarded after just one use, and can take hundreds of years to break down in the environment. This can lead to a buildup of plastic waste in landfills and in natural areas, which can have a negative impact on the environment and on human health.

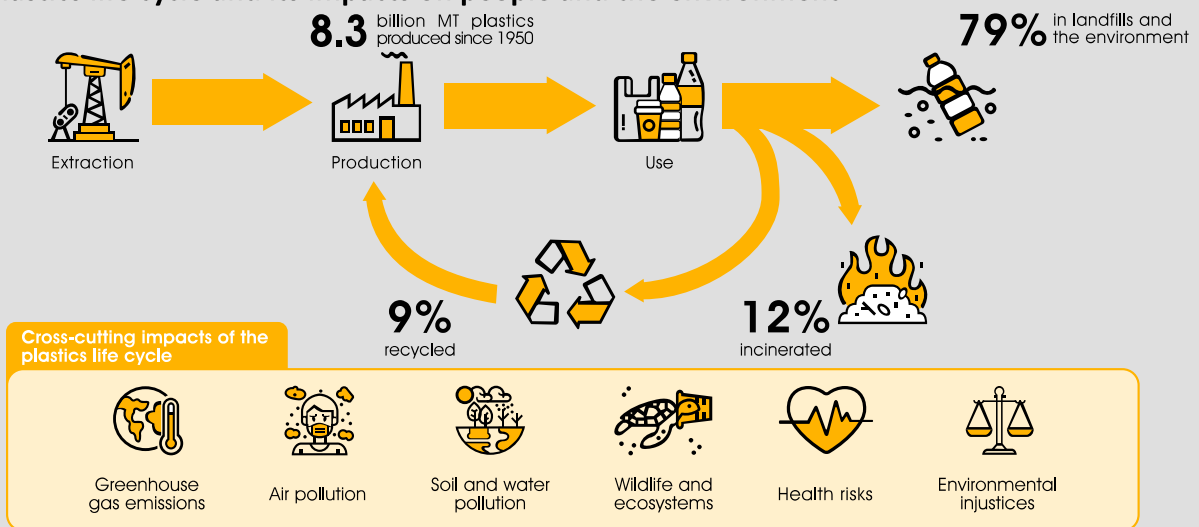
The ecology in Pakistan is under serious threat from the quickly growing plastic pollution. In order to critically evaluate the problem, policy, and political strands of Pakistan's plastic pollution, this paper will focus on all three. Additionally, utilizing the Policy Analysis Framework, this policy analysis will assess a number of efficient policy choices.

The impact of plastic pollution in Pakistan is significant. It affects the environment, economy, and human health. Here are some of the main impacts.





**The plastics life cycle and its impacts on people and the environment**



Source: Geyer, Jambeck & Lavender Law. *Production, use, and fate of all plastics ever made. Sciences Advances.* 2017.

**1. Environmental impact:**

Plastic pollution harms the environment by contaminating soil, water, and air. It also harms wildlife, as animals can mistake plastic for food or become entangled in it.

**2. Economic impact:**

Plastic pollution can have a negative impact on the economy, as it can reduce the value of land and water resources. It can also increase the costs of waste

management and damage tourism.

**3. Health impact:**

Plastic pollution can have a negative impact on human health, as it can release toxic chemicals into the environment. These chemicals can contaminate food and water sources, leading to health problems such as cancer, birth defects, and developmental disorders.

To address the issue of plastic pollution, the government and civil society need to work together to reduce plastic waste and promote sustainable alternatives. This can include implementing policies to ban or restrict the use of single-use plastics, promoting recycling and waste management, and raising awareness among the public about the impacts of plastic pollution.

## THE KILLER FACTORIES OF GOTH ALI MOHAMMAD

“Katriyon aur galiyon, muhallon ke naam Jinki napaak khashaak se chand raaton Ko aa-aa ke karta hai aksar vuzu” (Faiz Ahmad Faiz)

NAEEM SADIO



The moon no longer performs 'vuzu' in the dusty narrow streets of Goth Ali Mohammad—a small village located about two miles from the main Hub River Road in District Keamari, Karachi. Goth Ali Mohammad, forcibly and illegally occupied by greedy unscrupulous merchants of death, has now become a large open cauldron, emitting poisonous smoke and deathly particulate matters. Loaded with flammable oils, caustic chemicals and hazardous materials, 30-40 illegal factories have sprung up next to every other house, empty piece of land and every street, nook and corner of Goth Ali Mohammad. Trucks loaded with waste plastic, tankers full of chemicals and hundreds of drums filled with discarded engine oil arrive each day to conduct their unethical, illegal and deathly business. They block the already narrow streets of the goth, making it impossible for the residents and vehicles to move about. Even the funeral of a minor, one of the 19 persons who died of the poisonous gases, had to wait for hours, before the burial procession could proceed.

What is common between the 2012 Baldia factory (260 deaths), the 2021 Mehran Town Korangi fire (16 deaths) and the January 2023 Goth Ali Mohammad incident (19 deaths)? All three major disasters occurred because: a) The factories were operating illegally; b) They had not been approved or registered with the Labour Department; c)

They had not been approved by the Building Control Authority; d) They had never been visited by a Labour Inspector; e) They had never been registered or visited by Sindh Environment Protection Department; f) They had never been visited by Civil Defence or Fire Brigade Department; g) They were never registered with EOBI or SESSI; h) They had no system for Health and Safety; i) Not a single person was punished for negligence, commission, corruption or complicity in any of these disasters; and j) Not a single lesson was learnt nor a single reform was implemented after any of the three industrial disasters.

Goth Ali Mohammad, a quiet residential suburb of about 200 houses, is infiltrated by 30 to 40 illegal factories that are environmentally destructive and highly hazardous to human health. A number of these makeshift set-ups produce grease by crude methods of boiling and stirring used engine oil (UEO) and thickeners in open cauldrons at high temperatures. UEOs are a very dangerous polluting product. They contain polynuclear aromatic hydrocarbons (PAH) and high levels of heavy metals, well known for their high carcinogenicity. The environment degradation occurs due to disposal of UEO, burning, land filling, accidental spillages, and seepage into surface or ground water. This degradation poses a threat to humans and other living

organisms.

A number of other factories are engaged in recycling waste plastics by melting them at high temperatures. The burning of wasted plastic releases toxic gases like dioxins, furans, mercury, nitrogen oxides and volatile organic chemicals (VOCs) into the atmosphere and poses a serious threat to human and animal health. Phthalates, the very chemicals that give plastic their desirable qualities, are endocrine disruptors, associated with a plethora of health problems, from neonatal impacts on babies to allergies, rashes and asthma.

We are trapped in a system of government organisations that are not just inept, unprofessional, unethical and archaic, but also unwilling to learn or reform. It is impossible in today's age for so many factories to spring up in a small village, begin spewing poisonous fumes, toxic chemicals, blocking streets, killing residents and remain unnoticed and unchecked. The Heads of Labour, Environment, Building Control and other delinquent organisations ought to be held accountable for the murder of 19 innocent lives. Each and every factory in the residential areas of the goth ought to be shut down and dismantled. Only then the moon and the angels may return to perform 'vuzu' in the narrow dusty streets of the grief-stricken Goth of Ali Mohammad.

## Empowering Women to become self-reliant and take benefit from Government Schemes



Shehri-Citizens for a Better Environment in partnership with the Friedrich Naumann Foundation for Freedom Pakistan has been working for the social-economic development of Pakistan through advocacy, awareness raising, exchange of good practice.

To carry out this objective, Shehri has held workshops in Rohri, Salehpart, Mirpurkhas and Karachi. Our topic was **"Empowering Women to become self-reliant and take benefit from Government Schemes"** and our target audience is women and the transgender.

Empowering women to become self-reliant and take advantage of government schemes is a vital step towards gender equality and inclusive development.

We engage the women by informing them about Utilizing Government Schemes for Economic Empowerment, which have created for the social and economic welfare and uplift.

The objective of the workshops aimed to introduce and provide information about the registration procedure of different government schemes (BISP and EOBI programs) and empower women who have no access to the traditional banking system on how to access these schemes, and how the participants could take

advantage of them.

### **The Benazir Income Support Program (BISP)**

*(To check the eligibility, send [SMS] the CNIC number at 8171)*

The primary objective of BISP is poverty alleviation by providing cash transfers to eligible families. The program targets women as the primary beneficiaries, as they are often the most vulnerable and marginalized in society. It aims to empower women by providing them with financial resources and opportunities to improve their living conditions.

Eligible families receive monthly cash transfers of Rs. 2,000 to Rs. 6,000 (depending on the family's category). In addition to providing financial assistance, the BISP also offers skills training and vocational education programs to help beneficiaries increase their income and improve their economic status over the long term.

BISP identifies eligible beneficiaries through a comprehensive survey conducted by the government. The survey collects information on household demographics, income, and assets to determine eligibility for the program. Once identified, eligible families receive regular cash transfers through a transparent and efficient payment system.

In addition to cash transfers, BISP also offers various

initiatives to support the socio-economic development of its beneficiaries. These initiatives include vocational and skills training, health and education programs, and access to microfinance services.

### **Employees' Old-Age Benefits Institution (EOBI),**

Employees' Old-Age Benefits Institution (EOBI), Act is a federal Act. The law relates to old age benefit for persons employed in Industrial, Commercial and other organizations, employing at least 10 persons. Why we inform the women because they have no knowledge of this benefit nor do their husband. We make them aware about making sure that herself or her spouse/father/brother/son/daughter working in any industrial/commercial enterprise has been registered by their employer and their name has been added as beneficiary. Whether the EOBI card has been issued etc.

Employees' Old-age Benefit Institution (EOBI) is a government of Pakistan scheme, providing for compulsory social insurance. It extends Old-Age Benefits to insured persons or their survivors. Under EOBI Scheme, Insured Persons are entitled to avail benefit like, Old-Age Pension (on the event of retirement), Invalidity Pension (In case of permanent disability), Old-Age Grant (an Insured Person attained





March 04, 2023 at Rohri



March 05, 2023 at Salehpat



March 18, 2023 at Mirpurkhas



March 21, 2023 at St. Jausha Nursing Centre, Karachi

superannuation age, but does not possess the minimum threshold for pension) Survivor's Pension (in case an Insured Person is expired, e.g. wife). **This scheme presently pay approx Rs.10,000/- per month.**

EOBI also provides survivor benefits to the dependents of deceased employees, and invalidity benefits to employees who become disabled or unable to work due to illness or injury.

The EOBI scheme is mandatory for all employees in the private sector who are between the ages of 18 and 60 and earn below a certain income threshold. These workshops were held on these dates.

1. March 4, 2023 at Rohri"
2. March 5, 2023 at Salehpat"
3. March 18, 2023 at Mirpurkhas
4. March 21, 2023 at St. Joshua Nursing School, Karachi

Our findings after holding these workshops are that the rural women are extremely disadvantaged.

They have no knowledge about any government scheme or its benefits. They have no bank accounts, mostly illiterate. The benefits of EOBI and BISP are not on their radar. However, we gave them information and how to go about availing these beneficial government

sponsored schemes. In Mirpurkhas, we had a bank officer from UBL Mirpurkhas Branch, who attended as a resource person and informed and guided the women, the process and method to open a bank account. Sarwar Khalid informed the women in Rohri and Salehpat about the process for bank opening.

We also discovered that small NGO's such Akhuwat Foundation and Sindh Rural Support Organization (SRSO) are active in these areas and provide small soft loans to economically empower these women. Most of them were aware of these organizations.

## MERA HUNAR MERA KAAM – A SOCIAL ENTERPRISE FOR COMMUNITY EMPOWERMENT



(A Project of Urban Collaborative)

Stable economies providing innovative, inclusive revenue generation options for communities can help build an equitable and healthy society. Creating gainful employment opportunities or an enabling space for facilitating entrepreneurship is not only a government function, private citizens and organizations can also create opportunities through innovation and enterprise.

**Mera Hunar Mera Kaam** is just such an endeavor that aims to work with communities for enhancing their knowledge and skills, providing access to employment, facilitating entrepreneurship, and supporting social causes. The work finds resonance from the

**Sustainable Development Goal 8** that calls for promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.


As Wajeeha Farooqi, Project Manager, Mera Hunar Mera Kaam states, *'in the present times of increasing financial stress, we can't expect the cost of living to go down much. What is more within our reach is to innovate and build capacities to increase our earnings and diversify options for livelihood support. This is what Mera Hunar Mera Kaam aims to facilitate, focusing on the more marginalized communities'*.



This is Kiran and Her Story

**About Kiran**

Kiran, a 16-year-old and the youngest of 3 sisters and a brother, lives with her mother, who works as a house-help. Kiran has all her creative energies running and she wants to use them to make people feel special.



"While I work on my own parlour setup, I want to complete my education."

**Connecting with Mera Hunar, Mera Kaam**

When Kiran's mother first reached out to the Mera Hunar Mera Kaam team, they quickly put Kiran in touch with a salon close to her residence in Orangi and arranged for financial assistance to cover the cost of her training programme and purchase of cosmetics products.

**Struggles**

Kiran had to abruptly discontinue her studies after middle school owing to her father's demise. She found a passion in the beauty care work. She desperately wanted to enroll in a certification base training course but limited household earnings were not allowing her to follow her passion.

**Way forward**

Kiran has now enrolled into a beautician course and will be spending the next 4 months training as a beautician. In order to get more practice, she simultaneously tests out different makeup looks at home and takes mock exams as part of her training program. Kiran wishes to open a small parlour setup at her home and take up clients through her own social circle. With the earnings she makes, Kiran now also hopes to pick up from where she left off in her schooling.

**Mera Hunar Mera Kaam sets the following Agenda for Community Empowerment!**

**A) Building Knowledge and Skills**

The team collaborates with knowledge and skill based individuals and organizations around a diversified basket of knowledge and skill sets for training people belonging to less privileged, low income households and communities. Aim is to empower them for better living through gainful income generation - benefits it is felt would not just be financial, but also social and societal through improved access to quality education and healthcare and avoidance of engaging in non-productive, unhealthy life pursuits.

**B) Access to Employment and Entrepreneurship**

Knowledge enhancement and

**Our Knowledge and Skills Set Basket Like This**

- E-Commerce
- Auto Repairs
- Appliance Repair
- IT Skills
- Stitching
- Driving
- Carpentry
- Embroidery
- Cooking | Baking
- Beautician | Parlor
- Plumbing | Electrician
- Sporting Skills
- Arts & Music



**Knowledge and Skills Set Basket goes like this!**

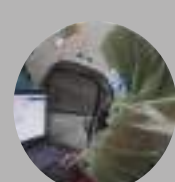
skills development would follow by assisting communities in accessing gainful employment or on treading the path of entrepreneurship. Here again,

the team of **Mera Hunar Mera Kaam** would collaborate with individuals and organizations that could act as employers or as facilitators in setting up businesses.

○○○ This is Mahnoor and Her Story

**About Mahnoor**

Mahnoor is one of 5 Siblings to a mother who teaches Quran online and a father who drives a rickshaw for a living. While enrolled in her BS in Mathematics from Karachi University, her growing interest was to enter into the IT based digital age to diversify her options for gainful earning to contribute to meeting her household expenses.



**"I want to be the support of my family."**

**Connecting with Mera Hunar, Mera Kaam**

When Mahnoor's parents made contact with team of mera Hunar Mera Kaam, the team provided her access to a learning institute that offered good quality education, where timings and was also accessible to her. Helped by sponsorship, her fees and associated costs were covered.

**Struggles**

Influenced by Mahnoor's interest, her parents encouraged her to pursue a domain within IT. She undertook extensive research to determine what appeals to her and attended an IBM webinar on digital marketing and was enthralled with the concept. However, prior understanding of graphics was a need for success in digital marketing; as a result, she made the decision to enroll in a course in graphic design first but financial constraints stood in the way of her achieving her dreams.

**Way forward**

Mahnoor has now enrolled in a graphics design course after completing which, she will continue her learning by taking more advanced courses in digital marketing. With the encouragement of her parents and financial support and guidance of Mera Hunar, Mera Kaam, Mahnoor now hopes to pursue a career in digital marketing as an IT specialist with a background in graphics design. She also intends to take the CSS or ISSB exam at the same time.



**Financial Support** - When it comes to setting up of businesses – financial support would be provided after careful assessment of the business plan.

At a later stage, **Mera Hunar Mera Kaam** aims to start in-house training for skills development.

### **C) Supporting Social Causes**

Another area of work involves supporting existing social causes where we have made a beginning by setting up a Book Bank - collecting books from people willing to donate, or buying from low budget vendors and then distributing them in schools run for low income communities

So, if you can

Help build a skill,

- Provide financial support for our program/for setting up a business
- Employ our trained communities

Connect and help Mera Hunar Mera Kaam make all this happen!!

Contact:

**Wajeaha Farooqi**

Project Manager,

Mera Hunar, Mera Kaam

Email: [info@urban.org.pk](mailto:info@urban.org.pk)

**A Project of Urban Collaborative**  
([www.urban.org.pk](http://www.urban.org.pk))

Innovating for a more livable tomorrow

Urban  
Collab  
orative

# SHEHRI - CITIZENS FOR A BETTER ENVIRONMENT



## INTRODUCTION

Shehri-CBE is a Karachi-based voluntary advocacy group established by concerned citizens in 1988 to project their apprehensions about the deterioration of the built and natural environment.

There is a special emphasis on tackling illegal construction and zoning violations, and their related symptoms, e.g., drainage, encroachments, parking and infrastructure. Shehri monitors the regulatory bodies and government agencies and encourages civil society to do the same.

### SUCSESSES

Passing of Sindh Senior Citizens Welfare Bill 2014 Demolition of Glass Towers illegal encroachment on the notified road-widening of Clifton Road.

Saving of 480-acre Gutter Baghicha Park on Manghopir Road. This is the largest open recreational space in a low income congested area of Lyari-inhabited by approximately one million people.

Saving of 62-acre Kidney hill Park in Karachi Cooperative Housing Society Union inclusive of 18-acre notified KWSB installations.

Establishment of the Oversee Committee of the KBCA and a

Public Information Counter.

Halting commercialization and sale of 11 KTC and 15 SRTC bus-depot plots in Karachi and Sindh. Today these plots are to be used by the CDGK for intercity bus terminals and other related transportation activity.

Saving (Makro) webb Ground playfield in Lines Area, Karachi.

Demolition of apartment structure Costa Linina in amenity Bagh-e-Ibne-Qasim, Clifton. CDGK has now developed it as a park.

Preventing commercialization of Doongi Ground park / playfield in Lahore.

Reducing, as part of Lahore Bachhao Tehrik, the amount of damage from Canal Bank Widening Project.

Reaffirmation of seismic building code in Quetta.

Training 1600 (Approx) police officers all over Pakistan on participatory citizen-police interaction, human rights violations and police reforms.

Over the years, Shehri's expertise has been recognized by superior courts and it has been called as amicus curiae (friend of the court) in cases dealing with built environment violations.

### OBJECTIVES

Establishment of an aware and pro-active civil society, good governance, transparency and rule of law.

Promotion of research, documentation, dialogue with and influence of public policies.

Setting up an effective and representative local government system.

Preparation of a representative Master Plan / Zoning plan for Karachi city and effective implementation of the same.

Observance of basic human rights in society.

### HOW IS SHEHRI RUN?

A volunteer Managing Committee, duly elected by the General Body for a term of two years, thereby functioning in an open and democratic manner. Membership is open to all who subscribe to its objectives and memorandum.

### SHEHRI needs Volunteers

to work in the following areas:

- Legal Affair
- Media and Outreach
- Million Trees Campaign
- Conservation and Heritage
- Fund Raising
- Gun Free Society

Name: \_\_\_\_\_

Occupation: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Contact No.: \_\_\_\_\_

E-mail: \_\_\_\_\_

### JOIN SHEHRI

#### To Create a Better Environment

Submit A Cross Cheque of PKR 5000/= in favor of Shehri-CBE Along with 2 passport size photos to become a member

Address: 88-R, Block-2,  
P.E.C.H.S., Karachi-75400.  
Tel / Fax : 021-3453-0646

### SHEHRI MEMBERSHIP

Don't forget to renew your membership for 2023 (Rs. 5000/=)

Join Shehri and play your role as a good citizen to make this city a clean, healthy and environmentally friendly place to live in!



# HBL

JANUARY - JUNE 2023

# More than just a bank

HBL contributes over Rs. 4 billion in the social uplift of Pakistan.\*

HBL is committed to support growth and improve the quality of life for its staff, clients, and the people of Pakistan.

HBL invites you to read its **Impact and Sustainability Report 2022** to learn how profitability and sustainability together make a real difference.



Scan for Impact & Sustainability Report 2022

From 2009 - 2022