



**RESPONSE MATRIX**

**POST-PRE-BID MEETING FOR**

**REQUEST FOR PROPOSAL (RFP)**

**DESIGN, BUILD, FINANCE, OPERATE, MAINTAIN**

**AND TRANSFER -AFFORESTATION,**

**REFORESTATION AND REVEGETATION (ARR)**

**PROJECT IN BALOCHISTAN**

JANUARY 29<sup>TH</sup>, 2026

## BACKGROUND

A pre-bid meeting was also held on 6th January 2026 by Balochistan Public-Private Partnership Authority (BPPPA), as Implementing Agency, for ***Design, Build, Finance, Operate, Maintain And Transfer -Afforestation, Reforestation And Revegetation (ARR) Project In Balochistan***. A total of 39 participants took part in the meeting. This summary response has been generated in response to that meeting. Following the meeting, the Authority received three written submissions, including one from Ahya Technologies (Private) Limited. It is noted that Ahya Technologies (Private) Limited did not participate in the pre-bid process, which is important context regarding their comments.

## SUMMARY OF RESPONSES TO KEY QUERIES / REQUESTS

With regard to the request for an extension of the RFP submission deadline, it is noted that the RFP was originally published on December 4<sup>th</sup>, 2025, providing Bidders with ample time to conduct preliminary assessments, form consortia, and carry out initial evaluations. During this period, Bidders were also provided with the official BPPPA contact details to seek clarifications or additional information as required. While a 2- or 3-months extension is not considered necessary, the Authority may consider a limited extension of up to one month to facilitate final bid preparation without delaying the procurement process.

The concern regarding Sections 2 and 4 of the RFP is mere mis-interpretation. These sections together assess both project development and implementation experience, including successful registration, verification, and issuance of carbon credits. Carbon credit trading is not separately scored because most global developers and investors are project implementers, not traders, and selling or trading can be undertaken through established carbon market platforms once a project is successfully developed. Including a trading-specific criterion would risk biasing the evaluation towards the bidders requesting this and render the assessment overly prescriptive. ARR-specific experience is required because ARR methodologies are materially different from other Nature-Based Solutions, involving baseline land-use modeling, permanence management, leakage accounting, stratified biomass estimation, long-term monitoring, and buffer pool contributions. Section 4 ensures that broader carbon market development, registration, and monetization capabilities are also captured, maintaining a balanced and fair evaluation framework.

Regarding the technical comments on the pre-feasibility study, it is clarified that the primary objective of the assessment was to qualify the areas available for ARR and provide an initial decision-support framework for the Government of Balochistan under limited budgets and resources. Comparisons with Sindh are not appropriate, as Sindh had simpler, riverine geography and higher resources, whereas three out of six locations in Balochistan were being investigated for the first time. In addition, the Government of Balochistan is offering a higher revenue share to the investor compared to similar projects in Sindh, reflecting stronger incentives for participation despite the more challenging terrain. Reviewer comments on technical detail, data sources, and field intensity highlight the limitations of a pre-feasibility study but do not undermine its purpose or validity, which was designed as an initial screening exercise. Full technical methodology, on-ground assessments, and project deliverables will be executed by the successful Bidder after project award.

	Request	Response
<p><b>Ahya Technologies (Private) Limited</b></p>	<p>5.1 Broadening of technical eligibility: That the Technical Criteria be amended to accept cumulative experience in high-integrity carbon projects (including technology-based carbon capture, avoidance of non-natural emissions, renewable energy-based projects and non ARR nature-based solutions) as qualifying experience for the Consortium partners.</p>	<p><b>Section 2 Technical Expertise – Prior Experience Clause 2.1</b></p> <p>It is important to note that carbon market methodologies applicable to Afforestation, Reforestation, and Revegetation (ARR) projects are materially different from other Nature-Based Solutions and technology-based carbon methodologies. ARR methodologies require project-specific expertise in baseline land-use determination, permanence and reversal risk management, leakage accounting, stratified biomass modeling, long-term monitoring obligations, and buffer pool contributions; elements that are unique to forestry-based carbon assets and not directly transferable from other carbon project types.</p> <p>In this context, the requirement under Clause 2.1 ensures that Bidders possess practical, on-ground, and methodological experience specific to ARR projects, which is essential for safeguarding environmental integrity, certainty of credit issuance, and long-term revenue realization for the Project.</p> <p>At the same time, it is clarified that the RFP does not rely solely on ARR experience as the determining factor for technical qualification. Section 4 (Project Development Experience) explicitly evaluates competencies beyond ARR implementation, including experience in AFOLU and non-AFOLU carbon market projects, successful generation and trading of verified carbon credits, and demonstrated expertise in carbon standards, MRV, GHG accounting, and carbon market execution.</p> <p>Accordingly, the evaluation framework adopts a balanced approach, ensuring that both ARR-specific technical credibility and broader carbon market development and monetization capabilities are assessed in a structured and transparent manner.</p>
	<p>Inclusion of market expertise: That "Carbon Market Project Development, Carbon Offset Issuance, and Carbon Offset Trading Expertise" be introduced as a distinct, scoring technical criterion.</p>	<p><b>Section 2 Technical Expertise – Prior Experience and Section 4: Project Development Experience</b></p> <p>It is clarified that the concern raised reflects a misinterpretation of Sections 2 and 4 of the RFP. These sections already assess a Bidder’s development and implementation experience in carbon projects, including successful registration, verification, and issuance of carbon credits under recognized international standards. Such experience inherently encompasses the core competencies required for carbon market execution.</p> <p>While the RFP does not prescribe a separate scoring category exclusively for carbon credit trading, this is by design. Introducing a narrowly defined “trading-specific” criterion would risk biasing the evaluation in favor of the</p>

		<p>organization requesting this change, rather than focusing on project development and long-term implementation, which is the primary objective of the concession. It is important to note that most global developers and investors are project implementers, not traders, and requiring selling/trading as a scored eligibility criterion would be unduly restrictive and not reflective of the broader market reality.</p> <p>It is further noted that carbon credit trading can be undertaken through established carbon trading platforms and intermediaries once a project is successfully developed, registered, and issued. Accordingly, while Bidders are encouraged to demonstrate access to or arrangements with such platforms as part of their commercial strategy, making trading expertise a mandatory or scored eligibility criterion would render the evaluation framework overly prescriptive and unduly restrictive.</p> <p>Therefore, Sections 2 and 4 collectively strike an appropriate balance by assessing project development capability and implementation experience, while allowing commercial flexibility for Bidders to engage trading expertise as required during execution.</p>
	<p>Rationalization of timeline: That the bid submission deadline be extended by a period of no less than ninety (90) days to the month of May to permit the completion of necessary on-site due diligence.</p>	<p>It is clarified that the request for a ninety (90) day extension is not considered justified. The RFP was initially published in December 2025, thereby providing prospective Bidders with ample advance notice to commence preliminary assessments, desktop reviews, consortium formation, and commercial structuring well ahead of the bid submission deadline. Further, Bidders were explicitly provided with official contact details of the Balochistan Public Private Partnership Authority (BPPPA) to seek clarifications or additional information during this period, enabling informed bid preparation.</p> <p>Extending the deadline by ninety days would unnecessarily delay the procurement process without materially improving bid quality.</p>
<p><b>Sardar Mohammad Ashraf D. Baluch (Pvt) Ltd.</b></p>		<p>The primary objective of the pre-feasibility assessment was to qualify the area available for ARR and provide an initial decision-support framework for the Government of Balochistan's investment. This exercise was conducted under limited budgets and resources and was not intended to replace a full project design or MRV-ready study. As mentioned in RFP, Bidders will be required to undertake thorough investigations, technical assessments, and fieldwork during project execution to validate area, soil, hydrology, carbon stock, and other parameters.</p> <p>Comparisons with projects in Sindh are not appropriate, as Sindh's riverine geography, simpler terrain, and higher resource allocation made its assessments inherently less complex. In contrast, three out of six locations in Balochistan were being investigated for the first time, involving complex coastal and inland ecosystems, and required preliminary Project Site Assessment, Area Estimation, and Carbon Stock Methodology under challenging</p>

		<p>conditions. Moreover, the Government of Balochistan is offering a higher revenue share to the investor compared to similar projects in Sindh, providing stronger incentives for participation despite the more difficult terrain.</p> <p>These limitations do not undermine the purpose or validity of the pre-feasibility study, which was designed as an initial screening and decision-support exercise under defined budgetary and time constraints, prior to on-ground project execution. Full project analysis, technical methodology, and deliverables are to be executed by the successful Bidder awarded the Project, and cannot reasonably be completed at the pre-feasibility stage.</p>
	<p>I. The approach used for Project Site assessment and Forest Inventory was based completely on GIS analysis. No field verification was undertaken in the whole exercise which was actually the most important aspect of the area site assessment and without field assessment, verification, data collection on sample plots of mangrove, the site assessment is considered incomplete. Even for GIS analysis, the ground-truthing is undertaken, which was not performed in the site assessment.</p>	<p>The feasibility study primarily adopted a GIS- and remote sensing-based approach to assess project sites due to the large spatial extent, logistical challenges of intertidal mangrove environments, and budgetary constraints inherent to the feasibility phase. The GIS-based assessment followed defined inclusion and exclusion criteria, including existing or historically mapped mangrove areas, intertidal zones exposed during low tide, and areas free from permanent infrastructure or settlements. Areas that were permanently submerged, highly elevated beyond tidal influence, or subject to conflicting land use were excluded. These criteria are consistent with IPCC AFOLU and GOFC-GOLD guidance for screening-level feasibility assessments. While a full plot-based forest inventory and Tier-3 biomass sampling were not undertaken, the study did include targeted Field engagement and validation visits focused on verifying land cover classification, mangrove condition and species presence, tidal exposure, accessibility, and signs of anthropogenic disturbance, as well as confirming that selected sites were representative of dominant carbon pools in the study area.</p> <p><b>References comments I-8:</b></p> <p>Reviewer comments I through 8 primarily relate to the level of technical detail, data sources, and field intensity applied to site assessment, potential area estimation, and carbon stock quantification. While technically valid, these observations highlight the inherent limitations of a pre-feasibility assessment when compared to a full project design or MRV-ready study.</p> <ul style="list-style-type: none"> <li>• GOFC-GOLD (2016). <i>A Sourcebook of Methods and Procedures for Monitoring and Reporting REDD+ Activities</i>. GOFC-GOLD Land Cover Project Office, Wageningen University.</li> <li>• FAO (2018). <i>National Forest Monitoring Systems: Monitoring and Measurement, Reporting and Verification (M&amp;MRV) in the Context of REDD+</i>. FAO Forestry Paper No. 181.</li> <li>• IPCC (2006). <i>Guidelines for National Greenhouse Gas Inventories</i>, Volume 4: AFOLU.</li> </ul>

		 <p>As part of quality assurance and validation, the Balochistan Forest Department was actively engaged in the assessment process. A subset of selected sites was visited and re-measured in the presence of Forest Department officials, allowing for independent verification of site conditions and confirmation that the GIS-based classification reasonably reflected on-ground realities. These visits also ensured alignment with national forest inventory protocols and standardized assessment methodologies.</p> <p>Furthermore, validation visits were planned and conducted to confirm that the selected assessment areas were representative of the broader mangrove ecosystem and associated carbon pools. These visits enabled cross-checking of the spatial distribution, ecological characteristics, and relevance of sampled areas, thereby enhancing confidence in the screening-level conclusions of the study.</p> <p>It is acknowledged that these validation activities do not substitute for a comprehensive field-based forest inventory. Accordingly, detailed ecological zonation, permanent sample plots, and Tier-3 biomass data collection will be undertaken during the project development phase, once dedicated funding is mobilized.</p>
	<p>2. As per the site assessment, the period chosen was Low tide month of December. No seasonal variation or seasonal changes</p>	<p>The use of December imagery was a pragmatic choice to ensure minimal cloud cover, consistent temporal comparison, and clearer land–water delineation. While seasonal variation, monsoon effects, and neap–spring tidal dynamics are critical for plantation success, incorporating full seasonal analysis requires multi-temporal datasets and field validation, which were beyond the feasibility scope. Importantly, this limitation affects micro-site suitability and species selection, not the overall conclusion that significant restoration potential exists. Seasonal and tidal variability will be explicitly addressed in the next phase.</p>

	including the neap and spring tide effects in the intertidal area were considered.	
	<p>3. Also even in GIS assessment, for determining potential area for mangrove plantation, topography / or estimation of high-lying areas was not considered.</p>	<p>The feasibility assessment did not include detailed topographic or elevation-based analysis (e.g., micro-elevation zoning, hydroperiod modeling) as the study was conducted at the pre-feasibility stage, with a focus on screening-level evaluation of restoration potential across a large coastal landscape.</p> <p>At this early stage, acquisition or outsourcing of high-resolution elevation datasets such as LiDAR, UAV-based photogrammetry, or very high-resolution digital elevation models was not feasible within the approved scope, timeline, and budget. These datasets involve substantial costs and are typically justified only after a project has been confirmed as technically and financially viable.</p> <p>The absence of fine-scale elevation analysis does not invalidate the feasibility findings, as the estimated potential area represents a gross suitability envelope, not a final plantable area. Elevation-based differentiation of low, mid, and high-intertidal zones, which is essential for species selection and plantation success, is a standard next-phase activity.</p> <p>Accordingly, detailed topographic assessment and hydro-geomorphic zonation will be undertaken during the project development phase, using high-resolution DEMs supported by field validation. This will allow refinement of site suitability, exclusion of high-lying or permanently inundated areas, and optimization of species-specific planting design in line with international best practices.</p>
	<p>4. For Carbon Stock Estimation, NDVI (GIS based method) as biomass proxy was used. This is the most basic method for carbon stock estimation and it is questionable as it lacks accuracy and the method is used by graduate students in labs where there are no funds available for field visits.</p>	<p>NDVI was used as a screening-level biomass proxy to estimate indicative carbon stocks and sequestration potential. This approach is acknowledged to have lower accuracy, particularly for structurally complex ecosystems such as mangroves. However, at feasibility stage, NDVI-based estimation is widely used to establish order-of-magnitude carbon potential for financial and strategic decision-making. The results were not intended for credit issuance or MRV reporting. More accurate, field-based biomass estimation will replace NDVI proxies during project development.</p> <p>As part of methodological validation at the pre-feasibility stage, the estimated carbon sequestration outcomes derived from GIS-based analysis were benchmarked against published values and operational project data from comparable mangrove ecosystems in Pakistan and the region.</p> <p>In particular, the estimated sequestration rates for Miani Hor were found to be comparable in magnitude to reported sequestration rates from the Indus Delta mangrove system, which is the most extensively studied</p>

		<p>mangrove ecosystem in Pakistan and hosts large-scale blue carbon projects, including the Delta Blue Carbon Project. This comparison provides an important reasonableness check on the feasibility-level estimates generated for coastal Balochistan.</p> <p>While ecological conditions differ most notably with arid mangrove characteristics in Balochistan versus fluviially influenced mangroves in the Indus Delta the order-of-magnitude similarity in sequestration rates supports the conclusion that the results are not anomalous or inflated, but fall within expected national and regional ranges for mangrove systems.</p> <p>This benchmarking exercise was used solely as a validation and sense-checking tool and does not replace the need for site-specific Tier-3 field measurements, which will be undertaken during the project development phase in accordance with Verra and IPCC requirements.</p>
	<p>5. Also, for estimation of NDVI, 10 m resolution imagery was used. At this resolution, canopy cover cannot be accurate and needs higher resolution imagery. For this kind of high-level feasibility study, this should not acceptable.</p>	<p>The feasibility assessment utilized Sentinel-2 imagery with 10 m spatial resolution, which is standard practice for pre-feasibility and screening-level studies covering large geographic extents. This phase of the study was explicitly designed as a pre-feasibility assessment, with the objective of determining initial technical and financial viability, rather than supporting detailed plantation design or MRV-ready carbon accounting.</p> <p>At the pre-feasibility stage, procurement of high-resolution commercial satellite imagery (e.g., sub-meter or <math>\leq 3</math> m resolution) or UAV-based surveys was not feasible, as such data acquisition involves significant costs and specialized processing, which were not provisioned within the approved scope and budget. Outsourcing high-resolution imagery for all proposed sites would not be justified prior to confirmation of project viability.</p> <p>While higher-resolution imagery can improve canopy delineation and reduce classification uncertainty, the use of Sentinel-2 imagery was sufficient for identifying broad land-cover classes, existing mangrove extent, and potential restoration zones at a screening level. Importantly, the results derived from this imagery were not intended for final site demarcation, planting layout, or carbon credit issuance.</p> <p>Accordingly, high-resolution imagery acquisition and/or UAV surveys are planned for the project development and MRV phases, once the project advances beyond pre-feasibility and dedicated funding is secured. These datasets will support detailed micro-site planning, canopy structure assessment, and compliance with international carbon standard requirements.</p>
	<p>6. The study lacks development and use of Tier</p>	<p>The absence of Tier-3 data is acknowledged and reflects both budgetary constraints and the current lack of published allometric equations for arid mangroves in Balochistan. Developing such equations requires extensive field sampling and laboratory analysis, which is not customary at feasibility stage. The study correctly identifies the</p>

	<p>3 data. The allometric equations should have been developed at the feasibility stage as the mangroves of Balochistan are arid mangroves and no Tier 2 data is available for arid mangroves. Hence, Tier-3 data (field level) data should be generated at field level to estimate the actual carbon stock estimation.</p>	<p>need for Tier-3 data and positions it as a critical next-phase activity to ensure compliance with Verra/ART standards.</p>
	<p>7. Even for below ground biomass and soil organic carbon estimation, general IPCC equations were used.</p>	<p>Generic IPCC coefficients were applied as conservative placeholders to provide indicative estimates of below-ground biomass and soil carbon. While site-specific measurements are essential for accurate carbon accounting, their absence at feasibility stage is acceptable and common practice. Importantly, the use of conservative coefficients reduces the risk of overestimation. Field-based soil carbon coring and root biomass assessments will be undertaken prior to project registration.</p>
	<p>8. The estimated potential area of 34,351 ha was based on GIS as mentioned above with no consideration of tidal effects and topography for evaluation of high-lying, mid-lying and low-lying areas. Hence, the potential area seems overestimated.</p>	<p>The estimated 34,351 ha represents a gross potential envelope, derived from GIS-based land cover classification, not a confirmed plantable area. The study clearly intended this figure to support strategic planning and financial modeling, rather than operational deployment. The reviewer's concern is valid; however, any overestimation will be addressed through progressive refinement using tidal, elevation, soil, and socio-environmental exclusion criteria in later phases.</p>
	<p>9. No Institutional, Governance, Legal and Policy Analysis was undertaken as part of feasibility study.</p>	<p>The statement that no institutional, governance, legal, or policy analysis was undertaken is incorrect. These aspects were addressed through a dedicated deliverable focused on conducting extensive legal and regulatory assessment (Deliverable 7), which reviewed the applicable legal, policy, and regulatory framework relevant to mangrove afforestation, carbon markets, and PPP implementation.</p> <p>In addition, institutional and governance considerations were embedded across the feasibility study, including carbon market and verification requirements, benefit-sharing arrangements, financial viability and</p>

		<p>government support assessment, PPP option analysis, and project risk assessment. These components collectively informed institutional roles, governance structure, and compliance pathways required for project development.</p> <p>Accordingly, institutional, governance, legal, and policy dimensions were explicitly considered within the scope and intent of the pre-feasibility study, consistent with international best practice at this stage. Detailed references can be provided as needed.</p>
	<p>10. No environmental and social baseline, water, soil and air quality measurements were undertaken as part of feasibility study.</p>	<p>The study was undertaken as a pre-feasibility assessment with the objective of qualifying land available for mangrove afforestation. Accordingly, primary measurements of water, soil, and air quality were not included in the scope, as these are typically undertaken during baseline establishment and detailed project design, once project boundaries and implementation sites are confirmed.</p> <p>That said, the study did include environmental and social baseline elements appropriate to this stage, particularly on the social and community dimensions. A social baseline assessment was conducted using a multi-tiered approach, combining desk research, site visits and surveys, and stakeholder engagement.</p> <p>The process began with an extensive desk review of published information, including government sources and data from the Balochistan Forest Department, to understand the socio-economic and environmental context of Gwadar and Lasbela districts. This covered livelihoods, land use, biodiversity context, climate vulnerability, and relevant policies, including the Government of Balochistan’s Community-Led Local Governance Policy (CLLGP). Relevant case studies of community-based projects were also reviewed.</p> <p>This was followed by the development of a standard operating procedure (SOP) to guide site visits and surveys. Locally tailored surveys were conducted to assess socio-economic conditions and community willingness to engage with the proposed project. Stakeholder consultations were held with BPPA, the Balochistan Forest Department, and the Sindh Forest Department, including lessons drawn from the Delta Blue Carbon project.</p> <p>The study also explicitly aligned with international carbon market requirements for social safeguards and outlined the Free, Prior and Informed Consent (FPIC) process, a key requirement under Verra and Gold Standard.</p> <p>In addition, a separate, and extensive High Conservation Value (HCV) Assessment Report was delivered, that was focused on identifying, and highlighting critically important environmental and social areas that need to be protected. The Assessment examined ecological significance, conservation challenges, and management considerations for Balochistan’s mangrove forests using the HCV framework. Photographic documentation from community visits is available and attached.</p>

		
	<p>11. No work plan for PPP model was established as part of feasibility study</p>	<p>The comment suggests that the feasibility study did not establish a structured PPP work plan, including implementation steps, roles, risk allocation, and transaction arrangements. This is incorrect.</p> <p>The feasibility study assessed PPP options, selected an appropriate PPP model, and translated this into implementable instruments. As part of the assignment, GGC supported the drafting of the Request for Proposal (RFP), which clearly defines the PPP implementation roadmap, procurement schedule, and the roles and responsibilities of the Government and the private partner.</p> <p>In addition, a draft Concession Agreement was prepared, establishing the PPP structure, institutional arrangements, risk allocation, performance obligations, and Key Performance Indicators (KPIs). Together, the RFP and Concession Agreement constitute a clear and actionable PPP work plan, moving the study beyond a conceptual feasibility and into transaction-ready documentation.</p> <p>Accordingly, a PPP work plan was not only established but operationalized through formal procurement and contractual documents, consistent with international best practice and Balochistan PPP Policy (2020) and Rules (2022).</p>
	<p>12. No MRV framework was developed.</p>	<p>It is not clear what this comment refers to. If the concern is about when third-party verification (VVB) would be scheduled, this was considered as an important input to the financial analysis to estimate potential revenue streams and inform project viability.</p>

		If the comment refers to Balochistan PPPA reporting or performance KPIs, these have already been defined in the RFP and draft Concession Agreement, ensuring clear monitoring and accountability responsibilities for the Government and private partner.
	13. For Biodiversity Assessment, no field visits or field observations were undertaken. Only desk-based data was used. Mangrove ecosystems are rich in biodiversity and biodiversity credits also been acquired as part of carbon credits. This is also one of the major gap in the feasibility study that the field-based biodiversity assessment was not undertaken.	<p>We agree that biodiversity is important; however, the feasibility study primarily focused on afforestation potential. Given that ARR credits are in high demand and command high prices (as identified in the carbon viability assessment we conducted), the study prioritized qualifying areas for afforestation.</p> <p>Even so, we also conducted a High Conservation Value (HCV) assessment and identified deforestation rates and their impact on biodiversity and local communities, highlighting ecological and social considerations. This provides a strong foundation for future detailed field-based biodiversity studies.</p>
	RFP deadline for submission may kindly be extended for a minimum of 6 weeks to allow us to physically visit all the sites and perform our own in-depth analysis	The request for a minimum six (06) week extension is noted. The RFP was published in December 2025, providing adequate time for preliminary assessments. While a six-week extension is not considered necessary, a Limited Extension Of Up To One (01) Month may be considered to facilitate final bid preparation, without delaying the procurement process

# ANNEXURE I: SUBMITTED REQUESTS FROM POTENTIAL BIDDERS



Date: January 23, 2026

1. (HE) Mir Sarfraz Ahmed Bugti  
Hon' Chief Minister,  
Government of Balochistan,  
Chief Minister's Secretariat,  
Quetta, Pakistan  
Through: Mr. Shakeel Qadir Khan, Chief Secretary, Government of Balochistan
2. Technical and Financial Evaluation Committee  
Design, Build, Finance, Operate, Maintain and Transfer  
Afforestation, Reforestation and Revegetation (ARR) Project  
A-49, Jinnah Town, Quetta, Pakistan

SUBJECT: REPRESENTATION REGARDING THE REQUEST FOR PROPOSAL (RFP) FOR THE "DESIGN, BUILD, FINANCE, OPERATE, MAINTAIN AND TRANSFER (DBFCL) - AFFORESTATION, REFORESTATION AND REVEGETATION (ARR) PROJECT"

Honorable Chief Minister,

السلام عليكم

## 1. PRELIMINARY

1.1. This representation is submitted by Ahya Technologies (Private) Limited ("Ahya"), acting for and on behalf of a consortium led by Fauji Fertilizer Company Limited ("FFCL"), in strategic partnership with Ahya and comprising leading global technical experts in the carbon markets (hereinafter referred to as the "Consortium").

1.2. As the nation's leading agriculture and innovation-focused conglomerate, FFCL has extensive carbon markets experience including (i) 49.5 MW Wind Power Project by Fauji Fertilizer Energy Limited, (ii) 50 MW Foundation Wind Energy-1 Wind Farm Project, and (iii) 50 MW Foundation Wind Energy-1 Wind Farm Project.

1.3. Ahya is the Middle East's first sustainability innovation company, operating the first voluntary carbon market - Tawazun, and project development arm with over 200+ projects registered, post-issuance, equivalent to ~24 Mn tCO<sub>2</sub>e of carbon offsets, valued at over USD 1.2 billion with 70% carbon dioxide removal ("CDR"). Ahya is also a winner of

[contact@ahya.ai](mailto:contact@ahya.ai) | [www.ahya.ai](http://www.ahya.ai)  
4th Floor, Building 45-C, Lane-15, Bukhari Commercial,  
Khayaban-e-Ittehad, Phase 6, DHA, Sindh, Karachi, Pakistan  
Ahya Technologies (Private) Limited



the United Nation's AI-for Good award at the 30th Conference of Parties ("COP-30") recognizing our AI-powered technology for bringing transparency and risk-mitigation to projects from the Global South.

1.4. The Consortium refers to the Request for Proposal ("RFP") issued by the Forest & Wildlife Department, Government of Balochistan and the Balochistan Public-Private Partnership Authority ("BPPPA") regarding the subject Project. While we commend the Government of Balochistan ("GoB") for this pioneering initiative to monetize the province's natural capital, we feel obligated to submit this formal representation.

1.5. This submission is made *without prejudice* to our rights and interests, and serves as a technical and commercial advisory. Our review indicates that certain provisions within the RFP constitute *prima facie* impediments to broad-based participation, potentially impacting the principles of competition and "Value for Money" as mandated under the *Balochistan Public Private Partnership Act, 2021*.

## 2. THE ISSUE OF RESTRICTIVE ELIGIBILITY CRITERIA (CLAUSE 2.1)

2.1. It is submitted that Section 2 of the Technical Evaluation Criteria (Annexure B of the RFP) provides that a Bidder will be allocated a maximum of 35 marks (out of 100) for having been awarded Afforestation, Reforestation, and Revegetation ("ARR") projects in the last 5 years. We note that this criterion, read along with the minimum technical evaluation score of 70%, in effect introduces an additional "*Basic Eligibility Criteria*", limiting eligibility to only Bidders possessing prior experience in ARR projects specifically.

2.2. This criterion is restrictively narrow. It fails to account for the fact that ARR is but one type of methodology within the broader carbon market methodologies. The technical competencies required for high-integrity carbon offset generation—namely baseline modeling, additionality assessment, leakage monitoring, and MRV (Monitoring, Reporting, and Verification)—are methodologically consistent across various Nature-Based Solutions ("NbS") and Technology-Based Carbon Capture initiatives.

2.3. By enforcing an "ARR-exclusive" filter, the RFP inadvertently and fundamentally disqualifies consortiums possessing superior financial strength and global carbon trading capabilities but lacking a specific, singular ARR project award of the prescribed acreage. This restriction limits the GoB's exposure to a wider pool of sophisticated developers capable of maximizing the *monetization* of credits, which is the ultimate commercial objective of this concession.

[contact@ahya.ai](mailto:contact@ahya.ai) | [www.ahya.ai](http://www.ahya.ai)  
4th Floor, Building 45-C, Lane-15, Bukhari Commercial,  
Khayaban-e-Ittehad, Phase 6, DHA, Sindh, Karachi, Pakistan  
Ahya Technologies (Private) Limited



### 3. THE MATERIAL OMISSION OF "CARBON MARKET EXPERTISE"

3.1. A forensic review of the scoring matrix reveals a material omission: the absence of a distinct evaluation category for Carbon Market Execution & Trading.

3.2. The commercial viability of this Project rests not merely on the biological act of planting, but on the financial act of *registration, issuance, and trading* under complex international standards (e.g., Verra, Gold Standard).

3.3. It is our considered view that failing to score Bidders on their ability to structure off-take agreements and navigate Article 6 mechanisms introduces significant execution risk. A Bidder may be proficient in forestry yet incapable of navigating the sovereign carbon trade, thereby jeopardizing the revenue stream for the provincial exchequer.

### 4. PROCEDURAL IMPRACTICABILITY OF THE SUBMISSION TIMELINE

4.1. The RFP stipulates a bid submission deadline of February 3, 2026.

4.2. We respectfully submit that this timeline renders the completion of a *bona fide* feasibility study virtually impossible. A project of this magnitude requires rigorous on-ground due diligence, including but not limited to:

- (a) Verification of the "Plantable Area" versus the "Gross Area" to prevent financial modeling errors;
- (b) Assessment of soil salinity and tidal hydrology; and
- (c) Security and social impact assessments in the coastal belts of Gwadar and Lasbela.

4.3. The foregoing activities are critical to ensuring that a proper feasibility study can be undertaken, the outputs of which directly feed into the project financial model and inform the technical, commercial, and risk assumptions underlying any bid. Further, the compressed timeline is impractical for international participants and materially reduces the likelihood of attracting a healthy and competitive pool of Bidders.

4.4. Therefore, compressing these critical workstreams into a window of less than ninety (90) days (further reduced by international holidays) forces credible Bidders to either withdraw or submit speculative bids based on desktop assumptions. You will appreciate that neither of these outcomes serves the GoB's interest in securing a binding, high-fidelity financial proposal.



### 5. SUBMISSIONS AND REQUESTS

In light of the foregoing, and to ensure the procurement process remains robust, competitive, and legally fair and equitable, the Consortium respectfully requests the Competent Authority to direct the issuance of a *corrigendum* effecting the following amendments

**5.1 Broadening of technical eligibility:** That the Technical Criteria be amended to accept cumulative experience in high-integrity carbon projects (including technology-based carbon capture, avoidance of non-natural emissions, renewable energy based projects and non ARR nature-based solutions) as qualifying experience for the Consortium partners.

**5.2 Inclusion of market expertise:** That "Carbon Market Project Development, Carbon Offset Issuance, and Carbon Offset Trading Expertise" be introduced as a distinct, scoring technical criterion.

**5.3 Rationalization of timeline:** That the bid submission deadline be extended by a period of no less than ninety (90) days to the month of May to permit the completion of necessary on-site due diligence.

Please note that the foregoing observations/requests are non-exhaustive. In parallel, we are in the process of compiling additional queries and observations in relation to the RFP and the draft Concession Agreement, with the support of our technical, legal, and financial advisors. These observations will be shared in due course. The purpose of such submissions will be to propose refinements to the RFP and the draft Concession Agreement aimed at enhancing their investability, ensuring alignment with applicable local and international best-practice benchmarks for comparable projects, and broadening the prospective Bidder base. This approach is intended to support the GoB in achieving optimal value for money while maintaining robust standards for Bidder quality.

We remain at your disposal to provide further clarifications regarding global best practices in carbon asset procurement.





Most respectfully,

For and on behalf of the Consortium,

A handwritten signature in black ink is written over a blue circular stamp. The stamp contains the text "AHYA TECHNOLOGIES (PRIVATE) LIMITED" around the perimeter and a central emblem.

Salaal Hasan  
*Chief Executive Officer*  
Ahya Technologies (Private) Limited

E: salaal@ahya.ai | M: (+92) 321 4410001

CC:

- Captain (Retd.) Raja Athar Abbas, Additional Secretary (Staff) to Chief Secretary
- Dr. Faisal Ahmad Khan, Chief Executive Officer, Balochistan Public Private Partnership Authority (BPPPA);
- Mr. Syed Amln, Principal Secretary to Chief Minister;
- Mr. Khalid Mandal, PSO to Chief Minister;
- Mr. Faraz Syed, Director (Projects), Balochistan Public Private Partnership Authority (BPPPA);
- Mr. Ahsanullah, Director Procurement, Balochistan Public Private Partnership Authority (BPPPA)

[contact@ahya.ai](mailto:contact@ahya.ai) | [www.ahya.ai](http://www.ahya.ai)  
4th Floor, Building 45-C, Lane-15, Bukhari Commercial,  
Khayaban-e-Ittehad, Phase 6, DHA, Sindh, Karachi, Pakistan  
Ahya Technologies (Private) Limited





## Sardar Mohammad Ashraf D. Baluch (Pvt) Ltd.

CIVIL ENGINEERS & CONTRACTORS

Dated: Friday, 16<sup>th</sup> January 2026

The CEO  
Balochistan PPP Authority  
49-A, Jinnah Town, Quetta

Sub: Extension in proposal submission deadline

Dear Sir,

Reference to the RFP for Afforestation, Reforestation and Revegetation (ARR) Project document as well as the discussions held at the pre-bid conference held on 6<sup>th</sup> January 2026. In this regard, we have the following observations and comments:

1. The approach used for Project Site assessment and Forest Inventory was based completely on GIS analysis. No field verification was undertaken in the whole exercise which was actually the most important aspect of the area site assessment and without field assessment, verification, data collection on sample plots of mangrove, the site assessment is considered incomplete. Even for GIS analysis, the ground-truthing is undertaken, which was not performed in the site assessment.
2. As per the site assessment, the period chosen was Low tide month of December. No seasonal variation or seasonal changes including the neap and spring tide effects in the intertidal area were considered.
3. Also even in GIS assessment, for determining potential area for mangrove plantation, topography / or estimation of high-lying areas was not considered.
4. For Carbon Stock Estimation, NDVI (GIS based method) as biomass proxy was used. This is the most basic method for carbon stock estimation and it is questionable as it lacks accuracy and the method is used by graduate students in labs where there are no funds available for field visits.
5. Also, for estimation of NDVI, 10 m resolution imagery was used. At this resolution, canopy cover cannot be accurate and needs higher resolution imagery. For this kind of high-level feasibility study, this should not be acceptable.
6. The study lacks development and use of Tier 3 data. The allometric equations should have been developed at the feasibility stage as the mangroves of Balochistan are arid mangroves and no Tier 2 data is available for arid mangroves.



## Sardar Mohammad Ashraf D. Baluch (Pvt) Ltd.

CIVIL ENGINEERS & CONTRACTORS

Hence, Tier-3 data (field level) data should be generated at field level to estimate the actual carbon stock estimation.

7. Even for below ground biomass and soil organic carbon estimation, general IPCC equations were used.
8. The estimated potential area of 34,351 ha was based on GIS as mentioned above with no consideration of tidal effects and topography for evaluation of high-lying, mid-lying and low-lying areas. Hence, the potential area seems overestimated.
9. No Institutional, Governance, Legal and Policy Analysis was undertaken as part of feasibility study.
10. No environmental and social baseline, water, soil and air quality measurements were undertaken as part of feasibility study.
11. No work plan for PPP model was established as part of feasibility study.
12. No MRV framework was developed.
13. For Biodiversity Assessment, no field visits or field observations were undertaken. Only desk-based data was used. Mangrove ecosystems are rich in biodiversity and biodiversity credits also been acquired as part of carbon credits. This is also one of the major gaps in the feasibility study that the field-based biodiversity assessment was not undertaken.

Therefore, in view of the above, it is requested that the RFP deadline for submission may kindly be extended for a minimum of 6 weeks to allow us to physically visit all the sites and perform our own in-depth analysis.

We would be grateful if you take our request into serious consideration.

Thanking you,

(Imtiaz Javed)  
Company Secretary

#### HEAD OFFICE

D-133, KDA Scheme No.5,  
Block 4, Clifton, Karachi.  
Toll : +92 21 35823391, 35823392  
Email: smad1@yahoo.com, info@dbaluch.com  
Web Site www.dbaluch.com

#### LAHORE OFFICE

Bungalow No. B-1, Phase-I  
Defence Housing Society (DHA)  
Lahore.  
Ph: 042-35691490

#### ISLAMABAD OFFICE:

House No. 351, Street No. 70,  
Main Nazimuddin Road, Sector  
F-11/1, Islamabad.  
Ph: +92 51-2110656 Fax: +92-51-2110658  
E-mail: smadbisbo@gmail.com

#### HEAD OFFICE

D-133, KDA Scheme No.5,  
Block 4, Clifton, Karachi.  
Toll : +92 21 35823391, 35823392  
Email: smad1@yahoo.com, info@dbaluch.com  
Web Site www.dbaluch.com

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E-mail: smadbisbo@gmail.com

