



Mr. Katsuya Nakanishi
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July 26, 2022

Subject: Follow -up Letter on concerns regarding TABEER LNG Terminal

Dear Mr. Takehiko Kakiuchi,

We address you today as members of civil society concerned by the human and environmental impact of your Corporation's decision to finance the construction of another LNG terminal in Pakistan. We are particularly troubled by what this will mean for local communities and ecology.

We also believe that this decision signals a clear **abdication of responsibilities** to keep the temperature of the planet below 1.5. It is unfortunate that your corporation is seizing **the narrative of transition** to forward the agenda of gas lock-in and in doing so fundamentally undermining the renewable energy potential of the country.

We have laid out a number of these concerns in two previous letters to you. The **lackadaisical response from your office**, the developing **severity of the situation**, and a number of **emergent concerns** has compelled us to, once again, share with you the concerns and grievances of local communities and stress the shortcomings of an outdated Environmental Impact Assessment (EIA) report of this project.

1. The EIA was approved in 2018 by Sindh Environment Protection Agency while the EIA itself was conducted much before that. As of April 2022, it has been almost 4 years since the ESIA was conducted by EMC Consultants for the Tabeer Energy (Private) Limited. Since that time **the environmental, social and the economic conditions have radically shifted** – partly due to the Russia-Ukraine war – requiring an urgent reappraisal of the project. A fresh iteration of EIA taking into consideration all the latest factors has become *sine-qua-none*. Failure to undertake a new EIA in light of these transformed realities is an egregious abdication of your environmental responsibilities. Even under the domestic laws, the approval granted to EIA



- expires after three years if the project does not commence within that period¹.
2. As it stands the current EIA suffers from a number of shortcomings. Significantly, it fails to discuss, predict and quantify **the volume of methane** that the entire operation of LNG value chain is expected to produce. The only criterion utilized by the consultant firm to **judge air pollution and climate change concerns is the degree of CO2 that will be produced** in the process of combustion. This is an inadequate assessment. LNG experts have warned that the environmental *impacts of* LNG can be worse than even coal considering methane is more potent than CO2 in warming the planet. According to a recent Guardian report on the 'carbon bomb', almost 2% of the total value supply chain of LNG goes into the atmosphere as methane.² The silence of the EIA on the impact of methane emission on the environment is therefore, alarming.³
 3. The social and economic baseline analysis in EIA notes the bleak situation vis-à-vis water quality, mangroves and the declining sustenance index of local fishing communities. It strongly links this to the reckless industrial pollution and the ongoing trajectory of State policy to build dams across the Indus watershed. However, it fails to assess the specific damage that the construction of LNG terminal will have on the lives and livelihoods of the fishers and other communities tied to this local ecology. This is an extraordinary omission that undermines the express purpose of an EIA.
 4. We have previously iterated that the criteria by which the EIA examines dangerous pollutants is fundamentally and dangerously flawed. Without evaluating the proposed project cumulatively in the context of previous as well as future developments, the simulations and modeling exercises are unduly restricted to the narrow impacts of the proposed project alone analyzing its environmental effects in an atomized manner, which is entirely inadequate given that extensive industrial activity has already led to the creation of a dead-zone around Port Qasim.
 5. The EIA also fails to register that the site selected for the construction of Terminal constitutes major hotspot of fishing for local communities and that

¹ Rule 18 of The Sindh Environmental Protection Agency (Review of Initial Environmental Examination and Environmental Impact Assessment) Regulations, 2014.

² <https://www.theguardian.com/environment/series/carbon-bombs-2022>

³ 5.2.12 Socioeconomic Impacts EIA.



its construction will have a **permanent impact** on the traditional fishing grounds. Instead, the report downplays this impact, claiming this restricted access will be only temporary.⁴ As we speak, the entire zone has been turned into a no-go area; the impact is devastating on fisher communities and it is drawing them into direct conflict with authorities policing the securitized zone. The EIA's failure to assess the permanent condition is another glaring omission.

6. Pakistan Fisher folk Forum, an NGO devoted to the issues of fishing communities have noted the exponential growth in the use of illicit substances among the local communities. The devastation of livelihoods subsequent to development of the LNG zone is a clear and unambiguous change in local condition. The EIA's failure to elucidate the consequences of livelihood loss and its failure to propose mitigatory steps to maintain and guarantee social and cultural cohesion among these local communities is another fundamental omission. Where the EIA does propose a supportive grant to 'community groups', there is no sustained analysis or study as to whether tourism⁵ is a viable replacement of traditional livelihoods, nor a description of the mechanisms by which such community based project will be undertaken, or how its proceeds will be shared. **The consequences of such a fundamental shift in livelihood remains undisguised and the well-being of traditional communities a footnote.**

7. Finally in lieu of Japan signing onto the **G7 commitment to end fossil fuel financing by the end of 2022**, it surely is incumbent upon Mitsubishi to divert its resources to clean energy infrastructures and restrain from fossil fuel infrastructure in Pakistan. Failure to do so portends a breach of this important shared commitment.

It is hoped that this outline of issues and concerns will draw Mitsubishi into a re-assessment of its involvement in Tabeer LNG, and we hope for a more substantive response from you than we have previously received.

⁴ 5.2.3 LNG Terminal Installations of EIA

⁵ Page 83- 5.2.13 Support to Coastal Community under CSR of EIA



Following community leaders, civil society members and organizations of Pakistan have endorsed the letter to the Mitsubishi for raising concerns on Tabeer LNG Project, Port Qasim, Karachi:

S#	Civil Society Member//CSO's Name	District/ Province	Affiliation/ CSO's Logo
1	Mr. Saeed Baloch	Karachi, Sindh	Pakistan Fisherfolk Forum
2	Indus Consortium	Islamabad	
3	Policy Research Institute for Equitable Development (PRIED)	Islamabad	
4	Alternative Law Collectives	Lahore, Punjab	
5	The Knowledge Forum	Sindh	
6	Visionary Forum	Sindh	
7	Grow Green Network, Pakistan	Sindh & Punjab	
8	Health Education and Life Protection (HELP) Foundation	Rajanpur, Punjab	
9	Initiative for Participatory Development through Peace (IPDP)	Rahimyar Khan, Punjab	
10	Social Youth Council of Patriots (Sycop)	Muzafargarh, Punjab	
11	Participatory Welfare Services (PWS)	Layyah, Punjab	
12	Tanzeem Tahafuz-e-Maholiat, Environmental Protection Organisation (EPO)	Bhakkar, Punjab	
13	Al- Rehmat Welfare Society (ARWS)	Gujranwala, Punjab	



14	Social Welfare and Community Development Society (SWCDS)	Vehari, Punjab	
15	Cholistan Development Council (CDC)	Bhawalpur, Punjab	
16	Good Thinker Organization (GTO)	Lahore , Punjab	
17	Saiban Kissan Society (SKS)	Multan , Punjab	
18	Village Shadabad Organization (VSO)	Dadu, Sindh	
19	National Disability & Development Forum (NDF)	Nawabshah, Sindh	
20	Laar Humanitarian Development Program (LHDP)	Badin, Sindh	
21	Advocacy, Research, Training and Services (ARTS) Foundation	Mirpurkhas, Sindh	
22	Sustainable Development Foundation (SDF)	Sanghar, Sindh	
23	National Advocacy for Rights of Innocent (NARI) Foundation	Sukkur, Sindh	
24	Village Development Organization (VDO)	Ghotki , Sindh	
25	Marvi Rural Development Organization (MRDO)	Khairpur, Sindh	
26	Sindh Community Foundation (SCF)	Hyderabad , Sindh	
27	Sukaar Foundation	Tharparkar, Sindh	