



Mr. Takehiko Kakiuchi

January 21, 2022

President & CEO, Mitsubishi Corporation  
3-1, Marunouchi 2-Chome  
Chiyoda-ku, Tokyo, 100-8086

**Subject: Socio-Environmental Concerns regarding the Tabeer LNG Project**

Dear Mr. Takehiko Kakiuchi,

The **TABEER LNG PROJECT** (the Project) is an integrated LNG supply project by Tabeer Energy Private Limited (Tabeer Energy), a wholly owned subsidiary of Mitsubishi Corporation (MC) that seeks to build a terminal at Port Qasim, Karachi for the import and regasification of Liquefied Natural Gas (LNG) in Pakistan. As members of Pakistani civil society and representing the concerns of local communities we would like to appreciate Mitsubishi aimed at taking interest for investing in energy sector in Pakistan but bring the following considerations to your attention:

**1 Transparency and Procedural Concerns:**

- a. The Environmental Impact Assessment Report (EIA) of the project is inaccessible. It is neither available on Sindh Environmental Protection Agency (SEPA) website,<sup>1</sup> at their physical office, or on the website of Tabeer Energy.<sup>2</sup> Since EIAs are public documents, its unavailability raises questions on principles of **transparency and accountability** of the development of the LNG Terminal.
- b. Similar considerations of **accessibility to information** are found in accessing relevant reports such as the 2016 Cumulative Impact Assessment for Industrial and Port Development at Port Qasim & Ecosystem Service Review. Numerous other reports remain inaccessible leaving any meaningful engagement in project planning seriously compromised.

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<sup>1</sup> SEPA is the mandated government agency to approve or otherwise the EIAs of the projects,  
<http://epasindh.gov.pk/>

<sup>2</sup> <https://tabeerenergy.com/>



- 2 Impact on mangroves:** the project site, the Indus Delta's Mangrove Forest, is a particularly environmentally sensitive area. The project has the potential for having an exponential impact on environmentally/ecologically and economically important mangroves:
- a. The Project will be sited at Port Qasim within the dedicated LNG Zone at Chhan Waddo – Chara Creek. The creeks are usually rich with fish and have many mangroves having protection under Ramsar convention which was ratified by the state of Pakistan on 23 July, 1976<sup>3</sup>. They are also a **common resource** sites benefiting and important for public at large. It is remarkable that open public consultation with communities and civil society has not been forthcoming.
  - b. Mangroves are interconnected with various other ecologies such as sea-grass, meadows and coral reef systems. They cover just 0.5% of the world's coasts but account for an estimated 10-15% of coastal carbon capture. In other words, they are powerhouses when it comes to carbon storage. According to the project documents, the project shall uproot/affect 9.8 hectares of mangroves land.<sup>4</sup> Questions around mitigation of the destabilization of the shoreline, sedimentation of streams flowing through the mangrove reserve and the damage caused to the **carbon sinks** remain unanswered.
  - c. Mangroves are also protective walls against the cyclone and gusty winds. Mangrove roots can break up the force of a storm surge, soaking up some of its energy and protecting people living on coasts from cyclone damage.<sup>5</sup> Thus, mangroves can contribute to **coastal defense** strategies.<sup>6</sup>
  - d. In the area of Indus Delta that includes project area too, the mangroves have declined to a mere 82,000 acres from 600,000 acres. Although according to the Project Document, Taber Energy will provide 572,040 USD for the **rehabilitation of mangroves**. Lessons from past rehabilitation strategies both locally and internationally seem to have been ignored. From these it is clear that local communities are best placed to preserve and manage natural resources, in this case the mangroves. That there has been no commitment to involve them in the rehabilitation plans and processes indicates a failure to understand the nature and importance of the mangroves. It is similarly submitted that previous experience in mangrove restoration has been largely

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<sup>3</sup> [https://www.iucn.org/sites/dev/files/pakistan\\_mangroves\\_matrix\\_july\\_2019.pdf](https://www.iucn.org/sites/dev/files/pakistan_mangroves_matrix_july_2019.pdf)

<sup>4</sup> In the Matter of Public Comments- Application for Construction & Operation of LNG Terminal by Taber Energy (Pvt) Ltd Part II Dated April 06, 2021, <https://ogra.org.pk/lng-department>

<sup>5</sup> <https://theconversation.com/how-mangroves-protect-people-from-increasingly-frequent-and-powerful-tropical-storms-118200>

<sup>6</sup> <https://core.ac.uk/download/pdf/25493015.pdf>



ignored – it is clear that there is a very low percentage of survival of the planted mangroves,<sup>7</sup> suggesting that any rehabilitation process will yield negligible results. Given this, it is incumbent that any destruction of this complexed ecology requires deeper consideration and deliberation.

- e. The **LNG Zone** at Port Qasim already contains two other terminals under construction - Engro Elengy Terminal Limited (EETL) and PGP Consortium Limited (PGPCL). The ***cumulative impact*** of three terminals in such a sensitive site has not been assessed, publicly deliberated, and/or shared in a publicly accessible form.
- f. Fundamentally your ***methodology for assessing and accounting for the value of mangroves and hence the impact*** of your project is unknown and we believe compromised.

**3 Livelihoods:** whilst mangroves have a foundational ecological and environmental role, they also have a significant role in the livelihoods of local fisher communities. Concerns that appear to have been simply overlooked. As such the project has the following implications:

- a. The zone has become a ***'No Go'*** area for local communities resulting in significantly longer journeys for fishing and in their role as stewards of the mangroves. The LNG interventions have similarly forced fish resources to migrate to deeper seas leaving fishers with far longer journeys with the associated considerable economic hardship.
- b. As stewards of the mangroves a significant ***livelihood economy*** has been erased, whereby food products, stray firewood and other sustainable resources are no longer accessible to local communities. This has a similar, unaccounted for, economic impact on their lives.
- c. Given this deleterious impact on livelihood, no consideration of ***economic rehabilitation and resettlement*** have been made.

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<sup>7</sup> See a report at <https://news.trust.org/item/20131203123452-q63ki>.



Following CSOs of Pakistan have endorsed the letter to the Mitsubishi for raising concerns on Tabeer LNG Project, Port Qasim, Karachi:

S#	CSO's Name	District/ Province	CSO's Logo
1	Indus Consortium	Islamabad	
2	Health Education and Life Protection (HELP) Foundation	Rajanpur, Punjab	
3	Initiative for Participatory Development through Peace (IPDP)	Rahimyar Khan, Punjab	
4	Social Youth Concil of Patriots (Sycop)	Muzafargarh, Punjab	
5	Participatory Welfare Services (PWS)	Layyah, Punjab	
6	Tanzeem Tahafuz-e-Maholiat, Environmental Proteciton Organisation (EPO)	Bhakkar, Punjab	
7	Al- Rehmat Welfare Societty (ARWS)	Gujranwala, Punjab	
8	Social Welfare and Community Development Society (SWCDS)	Vehari, Punjab	
9	Cholistan Development Council (CDC)	Bhawalpur, Punjab	
10	Good Thinker Organization (GTO)	Lahore , Punjab	
11	Saiban Kissan Society (SKS)	Multan , Punjab	
12	Village Shadabad Organization (VSO)	Dadu, Sindh	
13	National Disability & Development Forum (NDF)	Nawabshah, Sindh	
14	Laar Humanitarian Development Program (LHDP)	Badin, Sindh	



15	Advocacy, Research, Training and Services (ARTS) Foundation	Mirpurkhas, Sindh	
16	Sustainable Development Foundation (SDF)	Sanghar, Sindh	
17	National Advocacy for Rights of Innocent (NARI) Foundation	Sukkur, Sindh	
18	Village Development Organization (VDO)	Ghotki, Sindh	
19	Marvi Rural Development Organization (MRDO)	Khairpur, Sindh	
20	Sindh Community Foundation (SCF)	Hyderabad, Sindh	
21	Sukaar Foundation	Tharparkar, Sindh	
22	Grow Green Network, Pakistan	Sindh & Punjab	
23	The Knowledge Forum	Sindh	
24	Visionary Forum	Sindh	
25	Policy Research Institute for Equitable Development (PRIED)	Islamabad	
26	Alternative Law Collectives	Lahore, Punjab	