

11th August 2023

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SUBJECT: Response on behalf of the coal-affected Thari communities to letter dated 18th May 2023 written by Mr. Joonho Hwang on behalf of ADB Board of Directors on Energy Transition Mechanism Pre-Feasibility Study for Pakistan

We, the coal-affected communities of Thar, thank you for your reply to our letter dated 7th April 2023 regarding the ADB-led pre-feasibility study on Pakistan's energy transition mechanism (ETM). The first reading of your reply dated 18th May 2023 gave us hope that the coal-ravaged human lives, livelihoods and non-human life forms in our native desert land could be saved after all. This optimism was caused mainly by your assertion that ADB has updated its multi criteria analysis (MCA) for the pre-feasibility study and re-run this revised MCA's metrics for water stress and heavy metal contamination to account for the effects of coal mining in Thar. The other reason for our optimism was your promise to consider two coal-fired power plants for retirement under the energy transition mechanism and also include Thar-based coal-fired power plants among those being shortlisted for the purpose.

These assertions and promises made us believe that ADB was willing to use the methodology and process being adopted for its pre-feasibility study to reverse the coal-induced social, economic and environmental injustices which are further marginalizing and impoverishing the already marginalized and destitute people of Thar. As we communicated to you in our previous letter, these injustices are manifesting themselves through increased incidence of diseases in local plants, crops, animals and human beings, drying of indigenous trees, decline in local livestock population, worsening of air quality, poisoning of Thar's groundwater resources and degradation of its soil. We, similarly, believed – even though we still had several concerns about the methodology and process of the pre-feasibility study – that you had given due consideration to the social and environmental concerns raised in our letter to ensure a just and transparent energy transition in Pakistan.

We, however, are constrained to note that every reading of your letter subsequent to the first one made us lose our optimism. In fact, the more we read your letter the more

confused we became, lost in the labyrinth of its language which we, the semi-literate desert dwellers of Thar, seriously struggled to understand. Apart from being overladen with ADB's internal jargon, your letter was replete with many ambiguous phrases and sentences. Its overly technical and ambiguous language, indeed, explains why it has taken us so much time to get back to you.

Similarly, your acknowledgement that our voice matters in devising Pakistan's energy transition mechanism initially gave us the impression that ADB is an open and inclusive institution committed, above all, to the principle of a just energy transition. We, therefore, expected that it would now move beyond impersonal means of communication such as letter exchanges and would, instead, offer to hold public hearings to listen directly to the concerns and grievances of the communities adversely impacted by coal mining operations and coal-fired power plants working in Thar. We also hoped to get a solid commitment from ADB that our objections and reservations regarding the energy transition mechanism's methodology and process would be taken fully into consideration before finalizing it.

It was under such optimistic impressions that we looked into your letter again and again to find out if you had suggested any ways and means to ensure our participation in the energy transition mechanism's methodology and process. We could not find any. We also wanted to know exactly at which stage of the energy transition mechanism would ADB listen to us. We could not find any mention of such a stage in your reply.

These gaps have led us to believe that ADB is willing to allow us only cosmetic participation in its energy transition mechanism's methodology and process. Your objective does not seem to enable our meaningful contribution to the finalization of this methodology and process but, instead, you only have the limited objective of seeking our approval for the decisions already made behind closed doors in your faraway offices.

Your assertions about the re-running of MCA metrics for water stress and heavy metal contamination to account for Thar coal mining operations similar ring hollow. Though initially we were led to believe by your letter that ADB might positively consider our proposal to phase out coal mines from our native lands. We, however, were soon to be disappointed as we could not find in your response the detailed results of the MCA re-run and were unable to detect any suggestions for dealing with Thar-based coal mines irrespective of the fact that they happen to be the the most probable source of water stress and heavy metal contamination which had necessitated the MCA re-run in the first place.

We, therefore, have reached the conclusion that ADB's approach to energy transition is quite narrow and short-sighted – confined only to the retirement of a few coal-fired and combined heat power plants. It does not treat coal mines dug amidst our centuries-old habitat as a climatic hazard on its own even when they are wreaking large scale social and environmental havoc to our native ecosystem. Instead, it appears to see these mines as a minor environmental concern – that too because of their relationship with coal-fired power plants.

Like so much else in your letter, your promise that two coal-fired power plants will be included in the first five to be retired under Pakistan's energy transition mechanism looked to us like a positive development at first sight, only to be lost in the fog of ambiguity later. Your failure to share any substantive information in this regard gives us the impression that you made this promise only as an afterthought since it is not backed by any solid commitment to carry out a financial analysis of all ETM candidate power plants in a transparent and evidence-based scoring process.

Most importantly for us, you have chosen not to name any specific Thar-based coal-fired power plant to be included in the five plants being shortlisted for energy transition mechanism. This omission makes us wonder what could be the basis for the shortlisting of power plants if it does not include the social and ecological destruction being caused by coal-fired power plants operating in Thar. Even more worryingly, the language of your reply does not make it clear if any Thar-based coal power plant will be considered at all for decommissioning under the ongoing phase of energy transition mechanism.

We request you – and, by extension, the ADB Board -- to respond to all the queries and questions we have raised above at the earliest. We hope that you will also address our concerns and grievances about the methodology and process being devised for Pakistan's energy transition mechanism. If, however, you failed to do so, we, the powerless residents of a distant desert in Pakistan, will be justified to believe that ADB has left us alone to face the depredations of the companies destroying our lives and livelihoods through coal mining and coal-based power generation right next to our homes, hearths and places of work.

While we look forward to your response, we have also included our detailed response to your letter dated 18th May 2023 in the annex given below.

With regards,

Leela Ram

Advocate, Sindh High Court, Karachi

On behalf of Thar Koilo Rajjounri Katth (People's Tribunal on Thar Coal)

**Pre-feasibility Study on Energy Transition Mechanism Opportunities in Pakistan
Letter on behalf of Thar community sent via email to select ADB Board Members
(07 April 2023)**

<p align="center">Email and attached letter Mr. Leela Ram, Meghwar, Advocate Sindh High Court, Karachi/Representative Thar Community (07 April 2023)</p>	<p align="center">ADB Response (18 May 2023)</p>	<p align="center">Response of Thar’s coal-affected communities on ADB’s Comments (Dated 11th August 2023)</p>
<p>Dear Board Members and Alternative Board Members of ADB, I am writing this email to you on behalf of the inhabitants of many villages located in Tharparkar district of Pakistan’s Sindh province. We have been affected severely by coal-mining and coal-fired power plants operating in our area and have been raising our voices about our grievances at various Pakistani and international forums for the last decade or so. We have organized protest camps, held press conferences and reached out to senior government officials and local parliamentarians to highlight our plight but all these measures have borne no fruit. We have also written letters to the ADB’s Pakistan-based staff and consultants, sharing with them our concerns and problems regarding land acquisition for coal mines and coal-based power plants as well as their impacts on local water sources and other socio-economic resources of our native land. I am attaching with this email a detailed</p>	<p>Dear Mr. Leela Ram, While acknowledging receipt of your email and attached letter on behalf of the community in Thar to select ADB Board members dated 7 April 2023, please see ADB’s response in the preceding cover letter dated 18 May 2023 above. Please note that this Pre-FS is merely a first scoping exercise carried out in accordance with TORs that were agreed by ADB’s GOP counterparts. Any future ETM related work and expansion of scope and TORs would have to be recommended for further consideration and agreement by GOP. Please find below ADB’s responses to selected extracts from your latest letter.</p>	<p>Dear Joonho Hwang!</p> <p>Thanks for acknowledging the receipt of our email and the letter dated 7th April 2023.</p> <p>TORs and scope of a study decide much about its process; the range of issues to be covered and analyzed; and its results/findings. We have already communicated to you our concern regarding the systematic exclusion of the coal-affected communities of Thar in the ADB-led Pre-FS on Pakistan’s ETM. Notwithstanding the fact that any decision regarding Pakistan’s ETM based on Pre-FS and FFS will have critical implications for us—the coal-affected communities of Thar—the ADB didn’t consider us worthy of consultation in drafting the TORs and scope of the Pre-FS. Nor do we see inclusion of our voices in deciding the TORs and scope of the FFS. While reiterating our concern regarding our exclusion in the ADB-led ETM-related work, we will appreciate your response on our following questions regarding the TORs and scope of the current Pre-FS and future ETM related work:</p> <ul style="list-style-type: none"> • If the TORs and scope of the current Pre-FS are unfitting for the initial scoping exercise and do not cater to some contextual realities of Pakistan’s ETM, will the ADB remain obstinately stuck to them or consider the necessary revisions in them? • How will the TORs and scope of future ETM related work be articulated, improved and finalized? Will you consider it a secret exercise to be carried out by the ADB and GOP behind closed doors? Or will ADB consider the voices of the communities affected by coal

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<p>letter written by myself and my fellow Tharis to explain how and why coal-mining and coal-fired power generation have ruined our environment, our socio-cultural fabric, our subsistence-based economy, agriculture and livestock. We have also elaborated how coal-mines and power plants are resulting in large-scale dispossession and displacement of Thar's native residents.</p> <p>We, however, have noted regretfully that ADB's prefeasibility study on the 'Potential for Energy Transition Mechanism Opportunities in the Islamic Republic of Pakistan' has kept Thar-based power plants out of its mandate due to technical reasons. We strongly believe that leaving out these plants is not only shocking for us, it is also unjust given their devastating impacts on the people of Thar. On the basis of these submissions, we have underscored in our letter the need for retiring, or at least scaling down, power plants running in Thar.</p> <p>I sincerely hope that both sets of directors being addressed in this email will find time to read our letter and deliberate upon its contents seriously and empathetically so that ADB revises its prefeasibility study on the 'Potential for Energy Transition Mechanism Opportunities in the Islamic</p>		<p>and other fossil fuel-based power plants and civil society worthy of inclusion in this exercise?</p>

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<p>Republic of Pakistan’ and includes Thar-based power projects in it. The writers of the letter, including myself, eagerly look forward to hearing from you at the earliest.</p> <p>With regards,</p>		
<p>Selected extracts from the letter: In short, coal power generation has devastated Thar beyond what words can convey. Continuity of this operations spells doom for Thar’s land, its water, its air, its non-human inhabitants, and its people who are its children, its stewards and its keepers. Being the direct victims of coal-fired power plants, we are appalled that our testimonies and these socioecological realities are being deliberately and nonchalantly ignored by your team, supposedly for the reason that they “fall outside the agreed scope, TORs and timeline of the ongoing ETM pre-feasibility study.” Such a callous dismissal of our lived reality forces us to question the ADB’s sincerity and commitment to a just transition away from dirty fuels. We have not agreed to your “scope, TOR’s, and timelines”, just as we did not agree to coal-fired power plants, or the pillage, plunder and destruction of our motherland. We strongly question and protest the present methodology and direction of your pre-feasibility study on ETM in Pakistan. We</p>	<p>ADB responses to these letter extracts: We would like to reiterate that Thar CFPPs have been considered under ETM Pre-FS MCA. Please refer to Appendix 3 of Draft Report III (pages 104 – 114) which provides the complete list of CFPPs and HCPPs analysed and their corresponding rankings through the Energy Security, Financial Viability, Environment and Just Transition lenses. Specifically, the following plants using Thar coal (and their rankings based on total score) were included in the initial analysis: Thal Nova (rank 12), Engro Powergen Thar (rank 13), Thar Block I/SSRL power station (rank 14), Thar TEL (rank 15), Siddiq Sons power station (rank 16), Thar Block VI</p>	<p>We appreciate the selection of Thar Block-II Power Station and Lucky Electric for further financial analysis. At the same time, their ranking in the top-5 list and selection for further financial analysis appeared to be quite erratic and confusing to us. Here, we have the following questions regarding the ranking of Thar Block-II Power Station and Lucky Electric in top-five list selection and their selection for further financial analysis:</p> <ul style="list-style-type: none"> • What does the re-running of MCA metrics for the water stress and heavy metal contamination factors to account for Thar coal mining operations imply? • Did the initially run MCA metrics not include water stress and heavy metal contamination factors due to coal mining operations in Thar? If so, did the re-running involve updating of MCA and what parameters in updated MCA were adopted to account for mining-induced water stress and heavy metal contamination? • On the basis of which parameters, Thar Block-II Power Station and Lucky Electric were ranked within the top-5 list? Why and how only these two CFPPs were ranked in the top-five list? If the mining-induced water stress and heavy metal contamination factors is the crucial variable in their ranking in top-five list and selection for further financial analysis, why and how were other CFPPs of Thar—depending on the same coal mines—ranked outside the top-five list? More to the point, if the degradation of water and air in the area is the result of a cumulative harm to the ecology from Thar coal as a whole, why are the Thar coal fleet and mining operations not being considered for retirement in their entirety rather than through the selection of piecemeal projects.

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<p>are, therefore, conveying to you the urgent need to amend the pre-feasibility study design and include Thar coal projects in the final ETM plans. Below we summarize our concerns once again:</p>	<p>power station (rank 17). Each plant was analysed and scored against a set of indicators (a summary provided on page 28 in Report III). Based on the analysis, the initial MCA results suggested that there are other high-carbon emitting assets that take priority over CFPPs using Thar coal in terms of the order of retirement. Based on feedback from CSOs, NGOs and Think Tanks, the Consultants have re-run the MCA metrics for the water stress and heavy metal contamination factors to account for Thar coal mining operations. This has resulted in a higher ranking of plants that use Thar coal (ranking nos. 8-15). Two of these plants (Thar Block II Power Station and Lucky Electric)² are now ranking within the top-5 list and, hence, also selected for further financial analysis.</p>	<ul style="list-style-type: none"> • Lucky Electric is based in Karachi and being currently run on imported lignite, not Thar coal (as mentioned in the footnote of your document). If it is not dependent on the lignite resources of Thar, why and how has it been ranked in the top-five list and selected for further financial analysis? • There is no coal fired power plant specifically named as Thar Block-II Power Station. Will you please specify the CFPP of Thar Coalfield Block-II (TCB-II), which the ADB has selected for further financial analysis? <p>We will really appreciate if the ADB can share the details of re-running of the metrics of MCA, updated metrics of the MCA (if any), the parameters adopted in the updated metrics of the MCA and the evidence on the basis of which the two CFPPs were ranked in the top-five list. Besides, we would also love to be enlightened on the process to be adopted for ‘further financial analysis’ of the selected two CFPPs. And similarly, we ask what has been detailed regarding the financial costs of the health and ecological harms associated with these projects?</p>
<p>Coal-mining has been excluded from the study’s scope: A number of our social, economic, and environmental problems stem from ongoing coal-</p>	<p>The ongoing Pre-FS scope indeed looks at the fleet of power generation facilities (CFPPs and HCPPs) only.</p>	<p>Limitation of Pre-FS’s scope only to the fleet of power generation facilities, or say, exclusion of the coal mining operations in Thar from the Pre-FS is what we already know and are concerned about. Your response to our concern raises further issues/questions in our minds,</p>

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<p>mining operations in Thar whereas the ADB-led pre-feasibility study has excluded the effects of coal mining from its scope.</p>	<p>Being made aware of the prevailing adverse environmental and social safeguards impacts on communities from the Thar coal mining operations, however, the relevant decision-making authorities within GOP may, nonetheless, opt for more of the lower ranking plants (using Thar coal) to be considered with priority for a full feasibility study (FFS) to assess in detail the overall costs and benefits of the early retirement of these plants. Such FFS would be part of future ETM related work to be considered as requested by / agreed with GOP.</p>	<p>which, we hope, you will consider positively and bring clarity on them:</p> <ul style="list-style-type: none"> • Instead of taking ‘coal mining operations in Thar’ as an independent and intrinsic issue of ETM to be considered for ‘phasing out coal mines’, ADB sees it as a less significant, secondary issue merely in relationship to the coal-fired power plants (CFPPs) • ‘Adverse social and environmental impacts of coal-mining operations in Thar’ is something that was missing not only in the scope of Pre-FS but will continue to be missing in that of the FFS because ADB doesn’t consider it having any substantive imperatives for Pakistan’s ETM? • In the processes of Pre-FS and FFS for Pakistan’s ETM, ADB considers ‘adverse social and environmental impacts of coal-mining operations in Thar’ something trivial and hence an ‘optional’ matter to be left entirely on the discretionary bureaucratic powers of ‘the relevant decision-making authorities within GOP’? • Apart from playing the role of only a post office to communicate the concerns of the affected communities to the GOP, ADB has nothing to do with the ‘adverse social and environmental impacts of coal mining operations in Thar’?
<p>Parameters and scope for an environmental assessment of coal-based thermal power plants are inadequate and insufficient: The present data and analytic parameters for the assessment of environmental impact of coal-fired power plants is restricted to CO2 emissions, water stress and air pollution metrics. These parameters are wholly insufficient as they omit significant parameters including, for instance, water contamination, land</p>	<p>In addition to CO2 emissions, water stress, and air pollution metrics, the Environment score considers site degradation in terms of water contamination by heavy metals (ground water, surface water, soil, sediments) whereby plants located in regions with high contamination should be prioritised for early</p>	<p>We, the indigenous communities affected by coal mining operations and CFPPs in Thar, really appreciate the water stress and air pollution metrics and hope that the addition of these metrics to CO2 emissions will lead to prioritization of the Thar-based CFPPs for early retirement. The revised environmental metrics, however, place no special focus on biodiversity losses induced by coal mining operations and CFPPs in Thar. Besides, we found that the ADB has conceived these environmental metrics in isolation from their adverse social impacts, implicating our sources of sustenance—subsistence agriculture and livestock-rearing. Here we urge the ADB to revise the environmental metrics so as to include our livelihood losses caused by coal-induced environmental degradation.</p>

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<p>degradation, long term changes in aquifer flows, local weather changes etc. The health costs, biodiversity losses and long term cumulative and interactive effects of different environmental factors associated with coal mining and coal-fired power plants must also be accounted for in order to develop a sufficient assessment of environmental costs.</p>	<p>retirement (page 38 of Report III). The health costs are considered under the Just Transition score (page 42 of Report III) where community health benefits are quantified by taking the number of people surrounding the plant as a proxy. That is, the larger the population size of the surrounding area of a plant’s location, and the larger the proportion of minority groups in the area, the larger the community benefits are expected to be from the plant’s early retirement. As explained in the cover letter and mentioned in the previous responses, the comments received from stakeholders (including those on behalf of the Thar communities) have resulted in adjustments to the MCA methodology and the preliminary finding that CFPPs using Thar coal are now ranking higher in the list of CFPPs and HCPS to be prioritized for early retirement.</p>	<p>Additionally, we call your attention to a deeper problem with this scoring methodology: it has considered community health benefits in a manner that is unquantified in terms of actual costs to the public in financial terms. The present and continuing financial analysis is therefore itself incomplete.</p>
<p>Draft study and consultation process</p>	<p>We would like to refer you</p>	<p>We welcome the ADB’s acknowledgement of the coal-affected communities’</p>

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<p>ignore the spirit and principles of climate justice: We believe that the question of energy transition is an issue of climate justice. Restitution and rehabilitation of the victims of fossil fuel usage must, therefore, be a high priority. Full participation of communities affected by coal or any other fossil fuel and prioritization of their perspectives are indispensable for designing and carrying out any study on energy transition mechanisms. Their input must also find meaningful incorporation in the design of the consultative process, in the accountability mechanisms and in the transparency, scope, methodologies and execution of the actual study. ADB’s pre-feasibility draft study purports to address matters of just transition and climate justice but in practice it has entirely ignored or disregarded our input even though we have been directly impacted by coal-fired power plants.</p>	<p>once more to our previous response dated 31 January 2023, cited below: <i>“As an initial scoping exercise only, the ETM Pre-FS will not result in any projects being short-listed or selected, nor in clearly identified and/or de facto affected communities that would merit issuing (draft) Pre-FS outputs in local languages at this stage.”</i> Only once a specific asset has been earmarked by Pakistan’s decision- making authority for its potential early retirement under some form of ETM modality, the <i>de facto</i> affected persons and communities in relation to such early retirement will have been identified and consulted in accordance with all prevailing policy and process requirements. In addition, any concerns and grievances raised by such affected persons and/or communities will have been considered and mechanisms will have been agreed aiming to best address</p>	<p>feedback/in-puts in early retirement of the Thar-based CFPPs. But the ADB’s acknowledgement doesn’t give any clue of the mechanisms (e.g. public hearing) to be adopted for ensuring meaningful participation of the communities in the decision-making processes for Pakistan’s transition away from coal and other dirty fossil fuels to the cleaner and greener renewable energy sources. Secondly, community participation, as perceived by the ADB, appears to be cosmetic, a check box exercise. The communities will be consulted only after certain CFPPs have been short-listed for early retirement. Their feedback/in-puts will be systematically confined to the CFPPs already selected for early retirement. Their feedback/in-puts thus procured will be meant only for seeking legitimacy on the decisions already made.</p> <ul style="list-style-type: none"> • Why the ADB isn’t involving the communities in the processes related to short-listing of the CFPPs for early retirement? • Why is the ADB reluctant to listen to the communities’ concerns regarding the CFPPs, which have been affecting them the most? • If communities’ participation falls outside the scope of the Pre-FS, why is the ADB not ready to be creative and devise some mechanisms for having the community’s voices in shortlisting some CFPPs for early retirement?

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	such concerns and grievances as part of any ensuing ETM related work requested by GOP. Any constructive feedback received as a result of the stakeholder consultations in the context of the ongoing Pre-FS will help with the timely determination of the proper design and scope of such future work.	
Draft study has systematically excluded the full range of socio-ecological impacts of coal on Thar’s indigenous communities from the scope of its analysis: As described at length, coal-mining and coal-fired power plants in Thar have resulted in a number of social impacts on local communities but these impacts remain unaddressed under the framework suggested by the draft study. This is against the spirit and principles of a just transition.	While noting that ADB has no standing and involvement in the Thar coal mining operations, the (legacy) issues and concerns raised in relation to these operations are outside of the agreed scope, TORs, timeline and budget of the ongoing ETM Pre-FS. Additionally, we would again like to refer you to our previous response of 31 January 2023, as follows: <i>“While again thanking you for having brought the concerns and grievances of the communities affected by the ongoing Thar mining activities, we appreciate that some of those may require being addressed with priority</i>	<p>We know that the ADB doesn’t have any involvement in the coal mining operation of Thar. And we also know that the legacy issues of coal mining operations in Thar are not part of the TORs/scope of the Pre-FS on Pakistan’s ETM.</p> <ul style="list-style-type: none"> Do these facts absolve the ADB of its commitment to the principles of climate justice and just transition? <p>World over it is a known fact that coal, at each stage of its lifecycle—including mining, transportation and combustion—is toxic and hazardous both for human beings and ecology. The ADB’s approach to Pakistan’s ‘energy transition’ is, however, very narrow, short-sighted and limited only to dealing with the ‘burning of coal for generation of electricity that is supplied through the national grid’.</p> <ul style="list-style-type: none"> Hypothetically, if all the CFPPs currently run by IPPs are shut down today while the mining of Thar coal, its transportation to and combustion in the captive plants of industries goes on unchecked, will Pakistan ever be able to transition away from dirty coal to clean sources? <p>Some fertilizer companies have already signed memorandum of understanding (MoU) for using Thar coal (https://dailytimes.com.pk/1032897/fpcl-signs-mou-</p>

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	<p><i>without being subject to the uncertainty if, and if so, when they might potentially be addressed in the context of future ETM-related work. Under these circumstances, the best we can offer at this stage is refer you to Mr. Munir Abro, Senior Project Officer (Health & Rural Development) at ADB's Pakistan Resident Mission. If/when contacted, he will try to assist by directing you to the appropriate platforms and/or institution(s) where any non-ETM related (legacy) issues / concerns / grievances can be raised. Mr. Arbo can be reached at mabro@adb.org or +92 51 2087 227."</i></p>	<p>with-secmc-for-utilizing-thar-coal/) while some others are in the pipelines. The point we want to raise here is that the industrial use of Thar coal is likely to increase manifold in the years to come.</p> <p>On another note, just two days before you sent us the letter, the government of Sindh, Karachi Electric, Oracle Power and PowerChina signed a MoU for the development of Thar Coalfield Block-VI. (https://www.thenews.com.pk/print/1070687-ke-sindh-govt-sign-mou-to-develop-coal-fired-power-project)</p> <p>The development of TCB-VI, involves both the coal mining operations and coal-based power generation.</p> <ul style="list-style-type: none"> • How does the ADB see this development? Will the development of TCB-VI and establishment of additional CFPPs there implicate the ADB led energy transition in Pakistan? <p>Thanks for prioritizing redressal of mining-related concerns and grievances of Thar's coal-affected communities in the context of future ETM-related work. We are curious to know about the concrete steps ADB is planning to take for the probable redressal of our concern and grievances. Thanks for referring us to Mr. Munir Abro, Senior Project Officer (Health & Rural Development) at ADB's Pakistan Resident Mission and sharing his email address and contact number. Before we contact him, we would love to hear from you the ADB's policy position on 'phasing out of coal mines in energy transition process.</p>
<p>Secondary data used for the study is outdated and inappropriate: A number of reports and studies have been carried out on the environmental impacts of Thar coal projects on local land, water and air. The draft study makes no mention of any of these studies and fails to account for their various findings. The water-related data used in the draft</p>	<p>The report "<i>Pollution Status of Pakistan</i>" was the most comprehensive source we could find that includes available city level data. We do note that this was published in 2014 and, therefore, does not reflect the latest impacts on water contamination in the region.</p>	<p>Kindly refer to the following studies/ reports for details on the water contamination profiles of Thar coal blocks in recent months:</p> <p>https://pakistan.asia-news.com/en_GB/articles/cnmi_pf/features/2023/04/18/feature-01</p> <p>https://tribune.com.pk/story/2411854/thar-coal-poisoning-water-report</p> <p>https://www.brecorder.com/news/40205396/coal-mines-power-plants-</p>

Email and attached letter Mr. Leela Ram, Meghwar, Advocate Sindh High Court, Karachi/Representative Thar Community (07 April 2023)	ADB Response (18 May 2023)	Response of Thar’s coal-affected communities on ADB’s Comments (Dated 11th August 2023)
<p>study, in fact, has been taken from the countrywide generic statistics, containing no information about the actual empirical impacts of coal power projects on local water bodies. We believe that relying on such weak secondary data for the draft study is totally inappropriate.</p> <p>The Environmental score for Thar coal plants in the MCA fails to account for the on-ground realities of heavy metal contamination of Thar’s water aquifers caused by coal-fired power plants: Water tests have revealed alarmingly elevated levels of heavy metal toxins such as Arsenic, Selenium, Chromium, Lead, and Mercury in Thar’s aquifers and drinking water samples taken from dug wells across Thar Coalfield Block II. Mercury levels, for instance, have been recorded at 9400% of the recommended limits in some villages of this area. The draft study fails to consider the long-term socio-ecological effects of such heavy metal contamination and does not factor them into its analysis of environmental scores.</p>	<p>As explained in the cover letter and mentioned in the previous responses, the comments received from stakeholders (including those on behalf of the Thar communities) have resulted in adjustments to the MCA methodology and the preliminary finding that CFPPs using Thar coal are now ranking higher in the long list of CFPPs and HCPS to be prioritized for early retirement. Nonetheless, ADB would appreciate it if you could kindly share, or direct us towards the appropriate sources of, the more recent reports and/or studies referred to in your letter. Upon receipt of the same, the ADB TA team would gladly consider further MCA updates above and beyond the above-mentioned updates already made as a result of the stakeholder feedback.</p>	<p>polluting-thars-groundwater-study</p> <p>“Thar Coalfield Water Impacts: Financial and Social Risks,” conducted by Paul Winn at Hydrocology Consulting. Please share with us your methods for determining which plants to score over and above others in relation to these impacts on the hydrology and water quality which is a system wide impact of Thar coal operations rather than attributable to isolated plants.</p>

Leela’s feedback – do not tag people who did not want to be in the thread.