# Objections to the Environmental Impact Assessment (EIA) for the Construction of Malir Expressway

**To:** Director, SEPA, Karachi **Dated:** 9th March, 2022

The conducted EIA for the construction of Malir Expressway fails to address several key environmental impacts, the most important of which is the personal, social, and economic cost of the project on the residents of areas affected by the Malir Expressway project.

Before venturing into the detailed responses to the assertions made in the EIA with regards to its effect on local population, flora and fauna, environment, and heritage sites, it is imperative to keep in view the estimated beneficiaries of the project. The project's conservative estimate of per day traffic volume is around 9000 vehicles, saving an average of 14.3 minutes per vehicle per day. It is important to contextualize these numbers with regards to impact that the project will create on the residents of rural and urban Karachi and the critical flora and fauna in the project area.

It is also imperative to understand that the project's primary beneficiaries are going to be the residents of DHA and Clifton area, areas that are highly susceptible to sea-level rise projections due to climate change. Below is a screenshot of the sea-level rise coverage of the said areas by the year 2040; whereas the project estimates growth in the traffic between these parts of the city to the south, scientific estimations portray a more accurate picture of how sea level rise will submerge large parts of these areas .

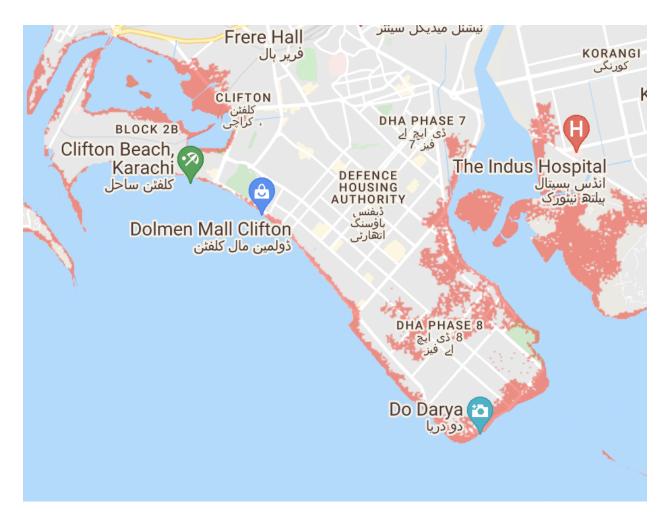


Figure 1: LAND PROJECTED TO BE BELOW 10-YEAR FLOOD LEVEL IN 2040 (Climate Central)

The project worth USD 160 million with its current design, in summary, is a project saving a small time for a small number of beneficiaries who will be one of the main victims of sea-level rises due to climate change, and this is being achieved by affecting a key region which is one of the only areas in Karachi with a potential to mitigate the impact of climate change. The lack of sheer logic in pursuing the project with its current design is both surprising and concerning.

More detailed comments on these aspects are below:

#### 1. Claims made regarding ground water resources do not reflect ground realities

The report states the "ground water resources are limited in the Project Area,
where small amounts of groundwater is extracted for private use." and mentions
Dumlottee well as an example of well field located in the project area, and further
states remains almost dry for the majority of the year. This does not reflect the

reality on ground. As per local sources, at least 27 wells irrigating a large area of agricultural land will be directly affected by the project, whereas, the project will affect the recharge of wells by affecting the flow of the Malir river tributaries. The extent of damage caused will include the loss of agricultural land in the area leading to a loss of employment for locals and the loss of affordable agricultural produce for a large number of residents in Karachi.

- In the EIA report, Section 7 titled 'Anticipated Project Impacts and Mitigation Measures page', the Table 7.1 (on page 7-1), point no. 4 talks about the Change in Hydrologic Regime and the impact significance is noted to be within the "low to medium" range, with the potential impact being of permanent nature (as stated in the table).
- Furthermore, point no. 5 on Seismicity (same page, 7-1), states that the expressway project falls in the Seismic Zone 2B region and the impact significance is noted to be "medium" and permanent in nature; additionally the potential impact is assessed to cause damage to the Project, as well as economic and human loss.

### 2. Ecological context stated in the report does not represent ground realities

- The report states the use of the Integrated Biodiversity Assessment tool (IBAT) as an important reference point for study the impact of the project, which identifies 118 listed species in IUCN red list, which collates the species at risk of extinction. While the list is smaller as compared to locally recorded species, the report even rejects that list by stating its own primary research conducted in the area.
- The report identifies 16 bird species in the project area, an online database "Ebird" identifies 176 bird species at Malir Dam, just one location along the project site (Annex A) which also includes near threatened bird species.
- The report states no endangered species have been identified in the project area, however, as per the list of species locally recorded and documented, at least two identified species have endangered status as per the IUCN red list. The screenshot below provide evidence of this (the status as well as the area they are present in). Both these species have been recorded on the project site as per the online Ebird database available publicly at <a href="https://ebird.org/hotspot/L12365576">https://ebird.org/hotspot/L12365576</a>.

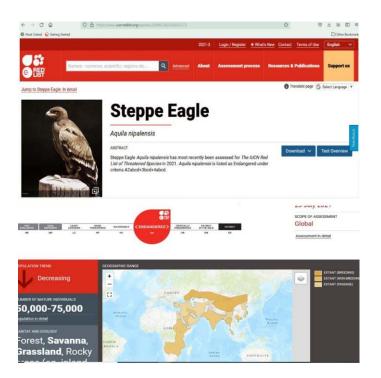


Figure 2: Steppe Eagle habitat and Status (IUCN)



Figure 3: Egyptian Vulture Habitat and status

• Similarly, a local researcher has identified 73 butterfly species in the area, which have no mention in the report (Annex A). It is important to note the importance of

butterflies and moths as they have been recognized by scientists as indicators of the health of biodiversity. Their fragility makes them quick to react to change, and their loss would be a major loss for the eco-system in Karachi. They indicate the presence of other invertebrates, which comprise over two-thirds of all species. These collectively provide a wide range of environmental benefits, including pollination and natural pest control. Butterflies are an important element of the food chain and are prey for birds, bats and other insectivorous animals. Butterflies support a range of other predators and parasites, many of which are specific to individual species, or groups of species. Butterflies have been widely used by ecologists as model organisms to study the impact of habitat loss and fragmentation, and climate change.

- The report states, "wildlife populations can tolerate some fragmentation if critical movement corridors are maintained otherwise a single change and alteration can lead to habitat modification." This point is extremely crucial as the expressway will affect the movement of wildlife across the 39 km project. Malir river supports the fuana on both sides of the bank and the project will block the movement in a significant manner, a reality that the report entirely evades.
- Similarly, the habitat of 10 mammal species and 15 reptilian species will affected due to the project current design, most of which are not included in the report. (list included in Annex A)
- Para 451 highlights 15% surcharge will be paid for loss to orchards, crops, and trees. In multiple places the EIA (para 599) recommends tree plantation as a viable form of rehabilitation of the environment. It also mentions that the project will avoid on purpose or chance killing of animals (para 559). Para 238 falsely asserts that wildlife in the areas has disappeared because of human induced activities and climate change. They also mention hunting and grazing as one of the reasons for loss of wildlife. However, they fail to mention that is projects like MEX and Bahria Town, Education City, and DHA City (that MEX is trying to make accessible) that are mostly responsible for the destruction and disappearance of the wildlife in the area. Constant noise, light and air pollution and movement associated with construction has damaged the sensitive habitat of native and migratory species. Therefore, these mitigation measures are unsatisfactory, cosmetic, and superficial and do not account for the damage to biodiversity, the ecosystem and animal habitat. It does not consider that areas in Malir and Gadap have been traditionally rich farming areas adjoining UNESCO protected forest area of Khirthar. Khirthar was designated a national park by the Sindh Wildlife Department in 1974 and is the first of Pakistan's parks to be included in the UN's listing of National Parks of

1975. In para 38, the EIA estimates that PKR 37.67 million will be needed to plant new trees. This is a cost being incurred after destroying the area's natural biodiversity including trees and is unreasonable and wasteful. These mitigation measures are in direct violation of domestic and international laws (Paris Agreement, Kyoto Protocol, UNFCCC) that Pakistan has ratified. It violates Pakistan Climate Change Act 2017 as these mitigation strategies are non-comprehensive and do not satisfy international law. Section 8(a) of this Act says the state must "formulate, comprehensive adaptation and mitigation policies, plans, programmes, projects and measures designed to address the effects of climate change and meet Pakistan's obligations under international conventions and agreements relating to climate change and within the framework of a national climate change policy as may be approved by the Federal Government from time to time." The EIA does not satisfactorily explain how such laws are being met.

#### 3. The report does not include the significant impact on the local population

- Based on local data collection, 210 permanent houses accommodating 1500 local resident will be demolished for the project, 66.35 acres of private agricultural land will be acquired for the project and 49 temporary structures will demolished. These are in addition to the religious and heritage sites that will be demolished to achieve the current project design. The demand from local population has been to alter the project design, however, the report does not include the strong opposition to the project. National media has reported the protests carried out in the area against the current project design: <a href="https://www.thenews.com.pk/print/771794-fearing-displacement-villagers-take-to-streets-against-malir-expressway">https://www.thenews.com.pk/print/771794-fearing-displacement-villagers-take-to-streets-against-malir-expressway</a>
  - You can found Annex D, where singed rejection of proposed project by locals villagers, direct and indirect affectees.
- The EIA states that a Land Acquisition and Resettlement Plan (LARP) should be prepared (see para 451) to compensate and resettle people. In the past, the GoS has reneged on providing resettlement and rehabilitation to evictees of operations and projects at Karachi Circular Railway (KCR), Gujjar and Orangi Nullahs. There is no assurance from the state that they will not once again lapse on their promises of rehabilitation. Hence project affectees need to be engaged in urgent dialogue on resettlement. As natives of Malir, as local traditional farmers, and as people who identify as indigenous, laws that pertain to the special rights of such people should be reviewed. The GoS must first obtain free, prior and informed consent as to whether resettlement is even an agreeable option for these residents. International laws and policies pertaining to farmers' rights have not been discussed at all in the EIA document.

- Only 10 days were given to review EIA for residents and concerned citizens, when SEPA with all its technical resources took 5 months. Residents of Malir, who the primary stakeholders of the project are and already face a language barrier are given no accessibility considerations in this public participation process. In fact, their participation is made functionally impossible due to time constraints and systemic barriers (of language, technical complexity).
- Nine local members of national and provincial assembly submitted a letter to Chief Minister Sindh on the negative impact of the current design of the project and requested a route change. The letter serves as evidence that the local population does not support the project as the EIA claims. (Letter attached in Annex B)
- In Para 315 the "land use" of the area is wrongly described as residential, educational, industrial, and commercial. In Para 215, however, the EIA does mention agricultural use of the land. However, nowhere in the EIA is it stated what processes are involved to change existing land use to the one proposed by this project.

### 4. Project is violating the EIA and EPA regulation itself

- EIA needs to be done before the project has started. However, in this case the EIA is being conducted a year after work was started.
- The validity of SEPA itself is under question considering SEPC is not functional. SEPA's standing under the provincial or local government is also under question.

## 5. The environmental and transportation justification for the road project is extremely weak

- Which demographics or areas residents or motorists is the expressway going to benefit most? Has there been a study done on the impact of heavy vehicles on the environment and the expressway itself. How much traffic congestion will this expressway avoid and divert from other roads of the city.
- The report does not include the additional transportation time and cost and the social cost of disconnecting the local population on both sides of the river bank. There are 13 main and link roads and 25 kacha roads that connect the local population on both sides of the bank, as the centuries old villages were formed on both sides of the bank due to the access of water the river brings. These roads and particularly kacha roads will be closed due to the construction of the project, the negative impact of which are both economic and social. The significant impact is not even discussed in the EIA, which weakens the argument of economic benefits that the project brings.

#### 6. The impact on heritage sites not included in the report

• The EIA does not identify any notified archeological site and instead posits that in case of a chance archeological site is discovered, then the project shall be halted immediately (paras 22, 570). In order to avoid irreparable and irreversible harm to our heritage sites, the GoS must utilize its laws (Sindh Cultural Heritage Preservation Act 1994, Antiquities Act 1975) and first conduct a thorough and detailed study of the area and then notify existing historic sites. Considering that the entire area of Malir and Gadap has a number of antiquities dating back to the 13th century with immeasurable cultural and monetary worth, the GoS has a legal obligation to preserve these sites which will be completely destroyed by MEX. This loss of cultural capital and history will be borne by future generations of Pakistan and indeed the rest of the world especially archeological academics and researchers. Pictorial evidence of some archeological sites that will be demolished due to the project is provided in Annex C.

### 7. The report fails to account for increased air and noise pollution due to greater traffic volumes in the area as a result of the project.

 Ambient air quality measured using Laser Particle Multifunctional Detector and not Beta-Ray Absorption as mandated by Sindh Environmental Quality Standards 2016 (p.618 Environmental Testing Laboratory Test Report, Annex VIII – Monitoring Reports) and (p.71 All projects to be implemented in Sindh must conform to SEQS during all the phases i.e., construction and operation.")

### 8. The project fails to investigate alternate methods to achieve stated goals with minimal environmental and social impacts:

 This EIA only mentions ideas and suggestions and no real solutions to the issues are mentioned.

### 9. Inadequate systems suggested to manage sewage and garbage produced along the route

 No adequate waste management solutions are mentioned for the postconstruction phase. No adequate sewage management or drainage solutions are mentioned for post construction phase

#### 10. Path of seasonal river and stormwater

• Part of the expressway is built on the riverbed. Although the report mentions that overhead bridges, and box and pipe culverts will be constructed to allow for the water to flow, this does not consider the structural integrity of these structures

during heavy urban floods. Additionally, has the integrity of the foundations of these structures within the riverbed been studied? The path of the river and storm water will be impacted causing the river to change paths, has that impact been considered? Additionally, the impact these structures will have on the ecology (flora and fauna) of the river has been glossed over.

### 11. Other objections to the EIA

- Traffic Study Report does not provide adequate planning for increasing mass transit (Annex V), is basically for private motor vehicles, and also has no lane for motorcyles, rickshaws, or non-motorized transport.
- Grievance Redressal Mechanism, focal person not communicated
- Traffic Management Plan (TMP) is not available, EIA requires that it "will be under Contractor obligation to notify the traffic management plan and its later changes to CSC, WSD, emergency services and Traffic Police, and also publish weekly programme in the local newspaper." (p.742 Annex XIII – Guide Traffic Management Plan) and "A comprehensive Traffic Management Plan (TMP) will be developed by Contractor" (p.342)
- Quarry management plan is not available, EIA recommends "selection of a site, sequencing of quarrying and rehabilitation and final land-use should all be carefully planned prior to commencement of work." (p.769 Annex XVIII – Quarry Management Plan)

# Annex A: List of Bird and Butterfly Species identified at only one location of the project site

6	8: 1.6	
Sr.#	Birds Species	
1	Rock Pigeon Columba livia	
2	Laughing Dove Streptopelia senegalensis	
3	Black-winged Stilt Himantopus himantopus	
4	Yellow-wattled Lapwing Vanellus malabaricus	
5	Red-wattled Lapwing Vanellus indicus	
6	Little Stint Calidris minuta	
7	Common Sandpiper Actitis hypoleucos	
8	Green Sandpiper Tringa ochropus	
9	Great Egret Ardea alba	
10	Cattle Egret Bubulcus ibis	
11	Indian Pond-Heron Ardeola grayii	
12	Steppe Eagle Aquila nipalensis	
13	Shikra Accipiter badius	
14	Black Kite Milvus migrans	
15	Isabelline Shrike Lanius isabellinus	
16	Plain Prinia Prinia inornata	
17	Common Babbler Argya caudata	
18	Purple Sunbird Cinnyris asiaticus	
19	Little Egret Egretta garzetta	
20	Egyptian Vulture Neophron percnopterus	
21	Bonelli's Eagle Aquila fasciata	
22	Green-winged Teal Anas crecca	
23	Yellow-footed Green-Pigeon Treron phoenicopterus	
24	Black-bellied Plover Pluvialis squatarola	
25	Black-headed Gull Chroicocephalus ridibundus	
26	Black Stork Ciconia nigra	
27	Black-winged Kite Elanus caeruleus	
28	Greater Spotted Eagle Clanga clanga	
29	Eurasian Sparrowhawk Accipiter nisus	
30	Rufous-fronted Prinia Prinia buchanani	
31	Red-vented Bulbul Pycnonotus cafer	
32	White-eared Bulbul Pycnonotus leucotis	
33	Black Redstart Phoenicurus ochruros	
34	Little Swift Apus affinis	
35	White-tailed Lapwing Vanellus leucurus	
36	Gull-billed Tern Gelochelidon nilotica	

37	Whiskered Tern Chlidonias hybrida
38	River Tern Sterna aurantia
39	Western Reef-Heron Egretta gularis
40	Booted Eagle Hieraaetus pennatus
41	Barn Swallow Hirundo rustica
42	Common Myna Acridotheres tristis
43	Asian Koel Eudynamys scolopaceus
44	Little Ringed Plover Charadrius dubius
45	Ruff Calidris pugnax
46	Temminck's Stint Calidris temminckii
47	Marsh Sandpiper Tringa stagnatilis
48	Great Cormorant Phalacrocorax carbo
49	Gray Heron Ardea cinerea
50	Brahminy Kite Haliastur indus
51	Long-legged Buzzard Buteo rufinus
52	White-throated Kingfisher Halcyon smyrnensis
53	Pied Kingfisher Ceryle rudis
54	Green Bee-eater Merops orientalis
55	Eurasian Kestrel Falco tinnunculus
56	Black Drongo Dicrurus macrocercus
57	House Crow Corvus splendens
58	Crested Lark Galerida cristata
59	Common Tailorbird Orthotomus sutorius
60	Bank Swallow Riparia riparia
61	Common Chiffchaff Phylloscopus collybita
62	Lesser Whitethroat Curruca curruca
63	Jungle Babbler Argya striata
64	Indian Robin Copsychus fulicatus
65	Indian Silverbill Euodice malabarica
66	House Sparrow Passer domesticus
67	White Wagtail Motacilla alba
68	Common Snipe Gallinago gallinago
69	Little Cormorant Microcarbo niger
70	Eurasian Hoopoe Upupa epops
71	Delicate Prinia Prinia lepida
72	Western Yellow Wagtail Motacilla flava
73	Citrine Wagtail Motacilla citreola
74	Red-backed Shrike Lanius collurio
75	Gadwall Mareca strepera
76	Common Kingfisher Alcedo atthis

77	Paddyfield Pipit Anthus rufulus	
78	Eurasian Collared-Dove Streptopelia decaocto	
79	Wood Sandpiper Tringa glareola	
80	Spotted Redshank Tringa erythropus	
81	Common Greenshank Tringa nebularia	
82	Indian Roller Coracias benghalensis	
83	Bay-backed Shrike Lanius vittatus	
84	Long-tailed Shrike Lanius schach	
85	Rosy Starling Pastor roseus	
86	Zitting Cisticola Cisticola juncidis	
87	Eurasian Wigeon Mareca penelope	
88	Mallard Anas platyrhynchos	
89	Gray Francolin Ortygornis pondicerianus	
90	Little Grebe Tachybaptus ruficollis	
91	Imperial Eagle Aquila heliaca	
92	Common Redshank Tringa totanus	
93	Bluethroat Luscinia svecica	
94	Eurasian Spoonbill Platalea leucorodia	
95	Bank Myna Acridotheres ginginianus	
96	Eurasian Hobby Falco subbuteo	
97	Garganey Spatula querquedula	
98	Pallid Swift Apus pallidus	
99	Black-tailed Godwit Limosa limosa	
100	Glossy Ibis Plegadis falcinellus	
101	Ashy-crowned Sparrow-Lark Eremopterix griseus	
102	Gray-throated Martin Riparia chinensis	
103	Red-rumped Swallow Cecropis daurica	
104	Great Gray Shrike Lanius excubitor	
105	Kentish Plover Charadrius alexandrinus	
106	Caspian Tern Hydroprogne caspia	
107	Dalmatian Pelican Pelecanus crispus	
108	Intermediate Egret Ardea intermedia	
109	Rose-ringed Parakeet Psittacula krameri	
110	Pied Avocet Recurvirostra avosetta	
111	Rufous-tailed Scrub-Robin Cercotrichas galactotes	
112	White-browed Wagtail Motacilla maderaspatensis	
113	Great White Pelican Pelecanus onocrotalus	
114	Oriental Honey-buzzard Pernis ptilorhynchus	
115	Eurasian Marsh-Harrier Circus aeruginosus	
116	Eurasian Wryneck Jynx torquilla	

117	Eastern Orphean Warbler Curruca crassirostris		
118	Lesser Sand-Plover Charadrius mongolus		
119	Rufous Treepie Dendrocitta vagabunda		
120	Variable Wheatear Oenanthe picata		
121	Curlew Sandpiper Calidris ferruginea		
122	Striated Heron Butorides striata		
123	Black-headed Bunting Emberiza melanocephala		
124	Chestnut-bellied Sandgrouse Pterocles exustus		
125	Pied Cuckoo Clamator jacobinus		
126	White-eyed Buzzard Butastur teesa		
127	Rock Eagle-Owl Bubo bengalensis		
128	Red Collared-Dove Streptopelia tranquebarica		
129	Eurasian Moorhen Gallinula chloropus		
130	European Roller Coracias garrulus		
131	Scaly-breasted Munia Lonchura punctulata		
132	Red-headed Bunting Emberiza bruniceps		
133	Pied Bushchat Saxicola caprata		
134	White-breasted Waterhen Amaurornis phoenicurus		
135	Yellow-bellied Prinia Prinia flaviventris		
136	Clamorous Reed Warbler Acrocephalus stentoreus		
137	Streaked Weaver Ploceus manyar		
138	Painted Stork Mycteria leucocephala		
139	Yellow-throated Sparrow Gymnoris xanthocollis		
140	Common Quail Coturnix coturnix		
141	Lesser Black-backed Gull Larus fuscus		
142	Northern Shoveler Spatula clypeata		
143	White-browed Fantail Rhipidura aureola		
144	Tree Pipit Anthus trivialis		
145	Striated Babbler Argya earlei		
146	Isabelline Wheatear Oenanthe isabellina		
147	Tawny Pipit Anthus campestris		
148	Brown-headed Gull Chroicocephalus brunnicephalus		
149	Greater Coucal Centropus sinensis		
150	Common Hawk-Cuckoo Hierococcyx varius		
151	Eurasian Nightjar Caprimulgus europaeus		
152	Spotted Owlet Athene brama		
153	Eurasian Skylark Alauda arvensis		
154	Red-breasted Flycatcher Ficedula parva		
155	Siberian Stonechat Saxicola maurus		
156	Water Pipit Anthus spinoletta		

157	Common Crane Grus grus
158	Indian White-eye Zosterops palpebrosus
159	Common Buzzard Buteo buteo
160	Indian Paradise-Flycatcher Terpsiphone paradisi
161	Oriental Skylark Alauda gulgula
162	Ashy Prinia Prinia socialis
163	Paddyfield Warbler Acrocephalus agricola
164	Blyth's Reed Warbler Acrocephalus dumetorum
165	Pale Sand Martin Riparia diluta
166	Greenish Warbler Phylloscopus trochiloides
167	Caspian Gull Larus cachinnans
168	Short-toed Snake-Eagle Circaetus gallicus
169	Tawny Eagle Aquila rapax
170	Black-rumped Flameback Dinopium benghalense
171	Desert Wheatear Oenanthe deserti
172	Alexandrine Parakeet Psittacula eupatria
173	Spotted Flycatcher Muscicapa striata
174	Slender-billed Gull Chroicocephalus genei
175	Common Woodshrike Tephrodornis pondicerianus
176	Rufous-tailed Rock-Thrush Monticola saxatilis

### List of Butterflies species found within the range of Project area.

S.No.	Species Name	Scientific Name
1	Common Rose	Pachliopta aristolochiae
2	Lime Butterfly	Papilio demoleus
3	Common Mormon	Papilio polytes
	Clouded Yellows	Colias
4	Spotless Grass Yellow	Eurema laeta
5	Common Grass Yellow	Eurema hecabe
6	Psyche	Leptosia nina
7	Small Cabbage White	Pieris rapae
8	Desert Bath White	Pontia glauconome
9	Large Salon Arab	Colotis fausta
10	Small Salmon Arab	Colotis amata
11	Blue-Spotted Arab	Colotis protractus
12	White Arab	Colotis vestalis
13	Little Orangetip	Colotis etrida
14	Crimsontip	Colotis danae
15	White Orangetip	Ixias marianne
16	Yellow Orangetip	Ixias pyrene

17	Common Albatross	Appias albina
18	Pioneer White	Belenois aurota
19	Common (or Lemon) Emigrant	Catopsilia pomona
20	Mottled Emigrant	Catopsilia pyranthe
21	Zebra Blue	Leptotes plinius
22	Pointed Ciliate Blue Anthene lycaenina	
23	Tailless Line Blue	Prosotas duboisa
24	Pea Blue	Lampides boeticus
25	Gram Blue	Euchrysops cnejus
26	Plains Cupid	Luthrodes pandava
27	Small Cupid	Chilades parrhasius
28	Forget-me-not	Catochrysops starbo
29	Black-spotted Pierrot	Tarucus balkanicus
30	Indian Pierrot	Tarucus indica
31	Spotted Pierrot	Tarucus nara
32	Striped Pierrot	Tarucus calllinara
33	Tiny Grass Blue	Ziula hylax
34	Lesser Grass Blue	Zizina otis
35	Dark Gras Blue	Zizeeria karsandra
36	African Grass Jewel	Freyeria trochylus
37	Small Grass Jewel	Freyeria putli
38	Dull Babul Blue	Azanus uranus
39	Bright Babul Blue	Azanus ubaldus
40	Common Copper	Lycaena phlaeas
41	Scarce Shot Silverline	Spindasis elima
42	Tawny Silverline	Cigaritis acama epargyros
43	Indian Red Flash	Rapala iarbus
44	Common Guava Blue	Virachola isocrates
45	Plain Tiger	Danaus chrysippus
46	Common/Striped Tiger	Danaus genutia
47	Blue Tiger	Tirumala limniace
48	Common Crow	Euploea core
49	Common Evening Brown	Melanitis leda
50	Common Three-ring	Ypthima asterope
51	Joker Butterfly	Byblia ilithyia
52	Common Leopard	Phalanta phalantha
53	Tropical Fritillary	Argynnis hyperbius
54	Painted Lady	Vanessa cardui
55	Lemon Pansy	Junonia lemonias
56	Yellow Pansy	Junonia hierta

57	Blue Pansy	Junonia orithya
58	Peacock Pansy	Junonia almana
59	Danaid Eggfly	Hypolimnas misippus
60	Great Eggfly	Hypolimnas bolina
61	Tawny Coster	Acraea violae
62	Brown Awl	Badamia exclamationis
63	Common Banded Awl	Hasora chromus
64	African Straight Swift	Parnara bada
65	White-braned Swift	Pelopidas thrax
66	Dark Branded Swift	Pelopidas mathias
67	Bevan's Swift	Pseudoborbo bevani
68	Dingy Swift	Gegenes nostrodamus
69	Spotted Small Flat	Sarangesa purendra
70	Indian Grizzled Skipper	Spialia galba
71	Sindhi Skipper	Spialia doris
72	African Marbled Skipper	Gomalia elma
73	Indian Palm Bob	Suastus gremius

Sr.#	Mamal Species	
1	White-footed Fox (Vulpes vulpes pusilla)	
2	Jungle cat (Felis chaus)	
3	Golden jackal (Canis aureus)	
4	Small Indian Civet (Viverricula indica)	
5	Indian crested porcupine (Hystrix indica)	
6	Indian Hare (Lepus nigricollis)	
7	Small Indian Mongoose (Urva auropunctata)	
8	Indian Grey Mongoose (Urva edwardsii)	
9	Indian hedgehog (Paraechinus micropus)	
10	Indian Desert Jird (Meriones hurrianae)	
Sr. #	Amphibians & Reptiles Species	
1	Indian cobra (Naja naja)	
2	Saw-scaled Viper (genus Echis)	
3	Russell's Viper (Daboia russelii)	
4	Sindhi Krait (Bungarus sindanus)	
5	Common Wolf Snake (Lycodon aulicus)	
6	Russell's Kukri (Oligodon taeniolatus )	
7	Rough-Scale Sand Boa (Gongylophis conicus)	
8	Indian spiny-tailed Lizard (Saara hardwickii)	
9	Oriental Garden Lizard (Calotes versicolor)	
10	Minor Snake-eyed Skink (Ablepharus grayanus)	
11	Bengal monitor (Varanus bengalensis)	

12	Indian fringe-fingered lizard (Acanthodactylus cantoris)	
13 Common sun skink (Eutropis multifasciata)		
14	Common Leopard Gecko (Eublepharis macularius)	
15	Marbled Toad (Bufo stomaticus)	

### Annex B: Letter of Local Representatives to Chief Minister Sindh on the Project Design

To,

Syed Murad Ali Shah,

Honorable Chief Minister Sindh.

### SUBJECT: REQUEST FOR CHANGE THE ROUTE OF MALIR EXPRESSWAY FROM MALIR RIVER RIGHT BANK TO LEFT BANK.

Dear Syed Murad Ali Shah,

With reference to above mentioned subject, it is to bring to your kind notice that We, the representatives of District Malir had a combined meeting regarding subject mentioned above and it is to state here that the current proposed route on right bank of Malir Expressway will demolish the oldest villages of the area.

That the approved route of Malir Expressway will also destroy the Green belt and agricultural land existing in District Malir. Whereas the current route will convert the indigenous people of the area into a minority and displacing thousands of them after demolishing their villages.

We would like to also state hereby that considering the compensation of private land the Government will have to pay more than 5 billion rupees but if route is changed from right bank to left bank, about 4 billion rupees of Government money will be saved.

We hereby request your honor to consider the content of this letter and direct the concerned for the change of the route of Malir Expressway from Malir River right bank to left bank in order to facilitate the indigenous people of the area.

Thanking You in Anticipation.

M. Sajid Jokhio Minister

Syed Agha Rafiullah MNA

Jam Abdul Karcem Jokhio MNA

M. Saleem Baloch MPA

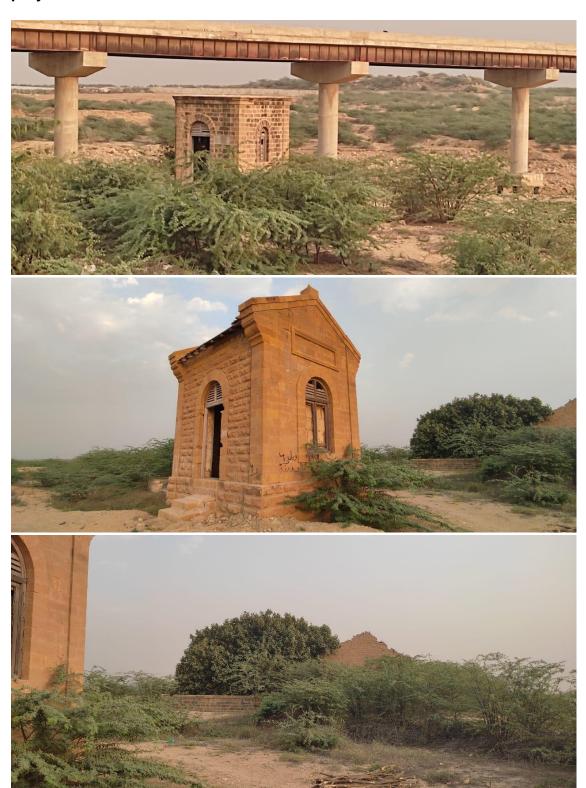
Mehmood Alam Jamot MPA

Raja Abdul Razzaq MPA

M. Yousuf Murtaza Baloch MPA

Shaheena Sher Ali MPA Abdul Hakeem Baloch Ex-MNA

Annex C: Examples of heritage sites that will be demolished as a result of the project



Annex D: Signature of direct and indirect affectees of Malir Expressway.

ہم المیان طیر اور متاثرین طیر ایکیریں وے شلک وستاویزے متفق ال اور سندھ الوائر نمنشل پروفیکش ایجنی (سیا) ے مطالب کرتے این کہ طیر ایکیریس وے کے	
ہم اہلیان میر اور متاثرین میر ایسپری وسے مسلمان رساویوں میں اور اور ان اور کردہاہے بلکہ نورے کراچی کے ماحول کے لئے تباہ کن ثابت ہو گا۔ منصہ رر نظر شانی کرے جونہ صرف ملیر کی عوام، لیز ؤ مکانات وزمینوں اور زراعت کو اثر انداز کر دہاہے بلکہ نورے کراچی کے ماحول کے لئے تباہ کن ثابت ہو گا۔	
منصہ رر نظر بنانی کر بے جونہ صرف بلیر کی عوام، کیز ڈرمکانات ور میٹول اور زراعت تو اسراندار سردہتے بلیہ پورے سرب	

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ہم المیان میر اور متاثرین ملیر ایکسیریس وے شکل و ستاویز سے شغق ایل اور سدھ الوائر نمنٹل پروفیش ایجینی (سیل) سے مطالبہ کرتے ہیں کہ ملیر ایکسیریس وے کے مصوبے پر نظر ٹائی کرے جونہ میری حوام ، لیز ڈ مکانات وزمینوں اور زواعت کواٹر انداز کردہاہے بلکہ پورے کرا پھی کے ماحول کے لئے تباہ کن ثابت ہوگا۔

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ہم المیانِ ملیر اور متاثرین ملیر ایکیپریس وے شلک وستاویزے مثلق بین اور سندہ انواز نمنٹل پر وقیاش ایجنٹی (سیبا) سے مطالبہ کرتے ہیں کہ میں آئے ہے۔ اے کے معصوبے پر نظر ٹائی کرے جونہ صرف ملیر کی عوام، لیزؤمکانات وزمینول اور زراعت کواٹراند از کررہا ہے بلک بورے کر ابقی سے ماحول کے لئے تباہ کئن جب ہوا۔

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(سیا) ے مطالبہ کرتے ہیں کہ جیر ایک اس	، وستاویز سے متفق ایل اور سندہ انوائز تمفل پرو قیکش ایجنسی	ہم اہلیان طیر اور متاثرین طیر ایکسیریں دے مسلک
ورائی کاول کے اعلامی جبت دو او	ز قرمکانات وزمیتول اور زراعت کواثر انداز کرر با به بلک پر -	منصوبے پر فظر ٹائی کرے جونہ صرف ملیر کی عوام، لی
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		1
ے مطالبہ کرتے ہیں کہ میں ایسی ہاں ہے۔ کے ماحول کے لئے تباہ کن ثابت اور اور	سے منفق بیں اور سندھ انوائر تمنشل پروفیکش ایجنسی (سیم) ۔ موز معند رادن در ویس کے اور ان کر ساتھ ساتھ ہو سے کرا تھا۔	ہم المیان ملیر اور متاثرین طیر ایکپریس وے مسلک وستاویز . متصوبے پر نظر ٹائی کرے جونہ صرف ملیر کی عوام ولیز ڈمکانات
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mo	4250 L 13716716.7	M. Sdeem
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16200	42501-3728160-9	
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-M	42501-73/1579-2	مريم
CP4	41302-1916555-6	المثاريم جاويد
Juli &	42501-13685-29-4	41,40,16.
Dazart	42501-4570949-0	ا درياد
Marker	42501-567-7665-6	مريع
Rote	42801-5372085-4	C. Crop
Pes	44103-8367499-8	رئسان
Nut	42501-0458902-8	
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5	42801-4929147-5	. 5 . 5
- to	425'01-669844-4	ورني:
Jul	42801-7252005-0	
Kaxmbibi	42801-5334874-8	فیده خبری ج
Shedi	42801-55-36247-0	فيزادى
Johila	42801-0423985-8	
FunNoz	4224-9624559-8	سويله .
Hande	42501-1607341-4	
Aziza	425-01-2193135-0.	one
Mare	42801-145-3144-8	الزيره
Paren	40301-957357-6	auest
SIED	192501-70989.75-4	ilen.
Saline	42501-3946882-4	سر الم
		026

یم اطبیان ملیر اور متاثرین ملیر ایکیریس وے مسلک دستاویز سے متفق بین اور شدہ افوائر نمنٹل پروکیش ایجنی (سیا) سے مطالبہ کرتے ہیں کہ بلیر ایکی ہے۔ سے کا مطالب کرتے ہیں کہ بلیر کا عام البیر ڈیم عاب ہوگا۔ مضوبے پر نظر ٹائی کرے جوند صرف ملیر کی عوام البیرڈ مکانات وزمینوں اور زراعت کو اٹر انداز کر دہاہے بلکہ پورے کراہی کے ماحول کے لیے جاہ کس جاری ہے۔

	يور مينول اور زراعت والرامداد مرواب	مویدیر نظر ٹانی کرے جو نہ صرف طیر کی عوام الیز ؤ مکانات
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ہم المیان طیر اور متاثرین طیر ایکیوریس وے مسلک و متاویز سے متفق ہیں اور سندھ انواز نمغنل پروفیکش ایجنبی (سیپا) سے مطالبہ کرتے ہیں کہ ملیر ایکیو ہی دے کے مصاف کے انتہا کہ مسلم مصاف کے باعد لکے تباہ کو عاب ہو گا۔ مصاف کے انتہا کی عاب ہو گا۔

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Ad.	94206238806.5	Amit
m. Habel	42501-9653332-9	M. Amis
Alth	42501-78024009	Asal
Alludin 1	42201-0773003-7	Alladin
Huzar,	42501-1711966:5	#/aron
(3) ley	42121-380382006	James - lehotor
M.Bato,	425017066174-3	M. Booka
Cserlo	423015213819-4	Sirus.
lullu'	4280172738645	latchan
Ash ni	425017975.8813	ALINAWUZ
Sarwan	4143036089141-9	Salwam
Culan Alkaro	4210154927281	Gulan AK bal
Johnner	425012713247-5	Jumma
Hage	14250 175 76642-0	HYREL
Shawin	4250169232731	Shamin Ahemas
Naus ut	42501-15011746-	NOON BAND
man Just	413048782598	Man 2000
Adduti	4250139303937	Abdul Johez
Municip	4250102179497	Nawaz Ai
ADDIM	425011375406-4	163i34
Shak Sol	42501-1132714-7	Sakidad
Boreler	428012755 1880	Bismin
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Minunepul	4210176118327	m. munawas
Alesto	4280148716791	Ab dullah
mercy	42501844629	7 mu Red
Kunt	4220199123617	Kushit.

ہم المبان طیر اور متاثرین طیر ایکسریں و مسلک وستاویز سے منفق بی اور سندھ انوائر نمنٹل پروفیکش ایجنی (سیم) سے مطالبہ کرتے ہیں کہ طیر ایکسیریس اور در اعت کوائرانداز کردہاہے الکہ پورے کرایی کے ماحول کے لئے تباہ کن جات ہو گا۔

وسخط	ع فی کارو قبر	Pt.
Ad.	94206238806.5	Amit .
m. Halale	42501-9653332-9	M. Amis
Alth	42501-78024009	Asal
Alludi r	42201-0773003-7	Alledon .
Huzar,	42501-1711966:5	#/aroun
Bley	42381-380388006	James - le hotor
M. Baton	425017066174-3	M. Booka
Cserlo	423015213819-4	Sirus.
(allen	428017273864	letchan !
Alv ni	425017975.8813	ALINAWA 2
Servin	4143036089141-9	Salwam
Culan Alkalo	4210154927281	Gulan AKbal
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Hagh	4250 175 76642-0	HYRE
Shawin	4250169232731	Shamin Ahemas
Naws It	142501-15011746-	NOON BAND
man Just	-413048782593	Man 2000
Aldura	4250139303937	Abdul Joher
Municipal	4250102179497	Nawaz Ai
ASSAM	425011375406-4	163i34
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	74330272843313	M Yusout
the lain	4250119537811	Hussain
Nuver	4250141147587	Naveed
Minunewas	4210176118327	m. munawak
Alesto	4280148716791	Hedullah
mary	42501844629	of murrand
Kund	4220199123617	Kushit.

ہم المیانِ طیر اور متاثرین ملیر ایکسیریس وے مسلک دستاویز سے مشفق ہیں اور سندہ انوائر نمنٹل پروفیکش ایجنبی (سیپا) سے مطالبہ کرتے ہیں کہ ملیر ایکسیریس وے کے متحق ہیں کہ میٹر ایک اور زراعت کوائرانداز کردہاہے بلکہ پورے کراچی کے ماحول کے لئے تباہ کن ثابت ہوگا۔

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and.	425011795272-5	Mo Argrad Baloer
- Jethi	12104-7617357-6	Lesham
Carlo.	414091412494-9	Whard Baloch
Cumb	425018074556-1	jamalliseen
- Av Sb	45402-4865328-7	Asif Hullan
Hauf	4250155340435	M. Hanry
(AWX)	425016247071-3	M-ehsab
I Sout	425014929736-5	M. ISMail
Able	534621956215-5	Abdul Gatous
Samper	42401-890.62969	Sameers
enjub	425616153357-3	sajjad
G. Rent	428016264021-9	
Alm	4280182470141	Abdil Razal
Jan mols	4250119749997	Jan Muham d
Gwine	4176305346813	Rul Hassain
PIABLE	428011502204-3	Peer Buse
Hum	42519239978-8	1tuma
Andu	4280184788345	Abdul mayeed
M. Nalsel	4250145760379	MiNesas
Babystor	425016420686-5	
Dive 4201	426040370550-1	Babbs Ali
TO MA.	101/04/1	426046376550-1 Taki Q Ali
Day 1	4286/74684561	
	4250189424495	Dost Muhammed
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M. Ada	428018611177 4280161013297	muhammad Ali
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