



**Boon for business... bane for farmers?  
The Ravi Riverfront Urban  
Development Project**

**AN HRCP FACT-FINDING REPORT**



Human Rights Commission of Pakistan

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# **The Ravi Riverfront Urban Development Project**

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## Introduction

Since late 2020, the Human Rights Commission of Pakistan (HRCP) has been alarmed by the launch of the mammoth Ravi Riverfront Urban Development Project (RUDP) by the Punjab government under the direct supervision of the prime minister. The project has been plagued by myriad controversies since the outset – from the expected damage to the environment to the very real loss of livelihoods for small landowners. Moreover, the involvement of private real estate developers in the reportedly multi-trillion-rupee venture makes the entire exercise even more suspect vis-à-vis official claims that the exercise is for the ‘benefit of the masses.’

Farmers, whose lands the government has begun to take over, are up in arms against forcible evictions and various state pressure tactics, while activists continue to voice their concerns about the project’s environmental cost.

With numerous civil society organisations and rights activists stirring into action, HRCP constituted a fact-finding mission to scrutinise the various impacts of the project, most notably violations of human rights, and to present possible mitigation measures to assist landowners as well as other civil society partners. In this regard, a consultation was organised on 26 January 2021, mostly with subject experts, urban planners, environmentalists, lawyers and HRCP members, including chairperson Hina Jilani. HRCP members also attended various protests and meetings to collect data for this report.

A mission comprising Raja Ashraf (HRCP Punjab vice-chair) and Fatima Faisal Khan and Salman Sikandar (staff members) visited several affected villages on 4 March 2021 and interacted with residents to determine first-hand the human cost of the project and see facts as they exist on ground.

This report is based on material collected during these field visits as well as consultations and interviews with numerous stakeholders – including protesting farmers and environmental experts – held from January to March 2021. It concludes with a set of findings emanating from the mission’s work, along with recommendations for civil society partners on the way forward.

## Background

Throughout history, rivers have been a source of livelihood for civilisations while bearing the brunt of their development. The Ravi River is no different. Having sustained life in Lahore and nearby regions for centuries, it stands near-dry today as a waste dump, owing initially to Partition in 1947 and then to politics, as well as population growth and negligence.

For years, successive governments have toyed with the idea of revitalising the ‘dead river’ – perhaps not so much for its environmental benefits than for its potential real estate value. The RUDP – as it is now known – briefly came to light in the Pervez Musharraf era and then saw some progress in 2013 during Nawaz Sharif’s government.<sup>1</sup> However, the plan was reportedly shelved due to high costs. Since then, various civil society groups and semi-government bodies have worked towards the river’s uplift<sup>2</sup> as a means of presenting a counter-proposal to the project, only to be blindsided by the recent announcement of the RUDP.

In August 2020, Prime Minister Imran Khan launched a PKR 5 trillion development project vowing to ‘revive the lost glory of Lahore’ and resolve the provincial capital’s crises of pollution, sewerage and water shortage, along with creating jobs and improving the

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<sup>1</sup> <https://www.dawn.com/news/1521916>

<sup>2</sup> <https://www.thenews.com.pk/tns/detail/691955-marked-by-folly>

environment.<sup>3</sup> However, the reality of the proposed ‘model city’ and the river’s channelisation is that such developments come with serious environmental hazards and evictions of local farmers, along with the destruction of their agricultural land.

A month before the RUDP was inaugurated in July 2020, the Punjab government established the Ravi Urban Development Authority (RUDA) to oversee the project and passed legislation providing it legal cover.<sup>4</sup> The prime minister’s personal involvement in the project—from hiring RUDA’s chairman to holding weekly review meetings—is perhaps unprecedented<sup>5</sup> and shows his determination to see it through.

Explaining the project in January 2021,<sup>6</sup> RUDA chairman Rashid Aziz—who, during the course of this mission, resigned from his post owing to ‘bureaucratic interference’<sup>7</sup>—said that the RUDP was spread over three phases of ten years each and after three decades would result in the development of a new city catering to around 12 million people across 102,074 acres, comprising 12 major zones, including themed sub-zones such as sports, medical, knowledge, and financial cities. He claimed the project would create around 240,000 direct construction jobs and millions indirectly as Pakistan-based allied industries would be given preference during development. Mr Aziz also explained that the RUDP’s basic model was a public-private partnership as the government did not have the funds to go it alone.

He said that the initial focus in the first phase was on a three-year plan—when the country is expected to hold the next general election—which includes lining the river and creating channel walls and a barrage to form a 46-kilometre-long lake. Moreover, the initial work would include two wastewater treatment plants and a residential zone named ‘Sapphire Bay’ on 2,800 acres.<sup>8</sup>

Besides highlighting Lahore’s poor civic and environmental conditions as a basis for the new city, RUDA has repeatedly cited the ‘threat’ of flooding from India as a rationale for the project, specifically channelising the river and clearing riverbed settlements to protect a vulnerable population.<sup>9</sup>

Interestingly, but perhaps not surprisingly, the authority’s grand plans fail to adequately address the devastating issue of resident farmers losing access to livelihoods during the land acquisition phase—as witnessed by the HRCP mission—as well as experts’ concerns over the negative impact that lining the river channel and developing housing societies will have on the local environment. Every time such issues are raised by the media or civil society, the authority, when it chooses to respond, has downplayed or denied them with standard officialese.<sup>10</sup>

## The cost of ‘development’

Environmentalists assert that any mega-development project, despite promises of being ‘eco-friendly’, comes at a huge cost to the environment. Even before the RUDP was formally

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<sup>3</sup> <https://nation.com.pk/08-Aug-2020/pm-launches-rs5-trillion-ravi-urban-development-project>

<sup>4</sup> <https://www.thenews.com.pk/print/684999-cm-usman-buzdar-approves-authority-for-modern-city-in-northern-lahore>; <https://tribune.com.pk/story/2256835/press-gallery-ravi-urban-authority-bill-sails-through-assembly>

<sup>5</sup> As explained by RUDA chairman Rashid Aziz in this interview: <https://youtu.be/9FABvd6c24I>

<sup>6</sup> <https://www.youtube.com/watch?v=9FABvd6c24I>

<sup>7</sup> <https://www.dawn.com/news/1613707>

<sup>8</sup> <https://twitter.com/GovtofPunjabPK/status/1351131554135859200?s=20>

<sup>9</sup> <https://twitter.com/SMImranPK/status/1329849367260516355?s=20>; <https://twitter.com/SMImranPK/status/1333852910057349120?s=20>; <https://twitter.com/SMImranPK/status/1342864182673289219?s=20>; <https://twitter.com/SMImranPK/status/1359099930200080384?s=20>.

<sup>10</sup> <https://tribune.com.pk/story/2286485/ravi-project-not-to-use-agricultural-land-lhc>

launched and its environmental impact assessment (EIA) published, the Lahore Conservation Society had expressed its concerns to the prime minister, stating in June 2020 that (i) the project was unsustainable environmentally, ecologically and financially; (ii) the concept itself contravened the Sustainable Development Goals (adopted by Pakistan); and (iii) the project was in violation of the Lahore High Court (LHC)'s orders in regard to the recommendations of the River Ravi Commission. It stressed that the river's channelisation (the alignment of its natural course) was against all principles of sustainable development and ecological sustainability of a river and its environment.

As part of its fact-finding mission, HRCP organised a civil society consultation on 26 January 2021 to explore the social, legal and environmental aspects of the project.

Dr Ali Usman Qasmi, an academic and activist at the Lahore University of Management Sciences, assessed the politics of such projects, contending that the RUDP was not aimed at resolving the country's severe housing crisis. Instead, he asserted, it represented a typical speculative real estate venture where the approach was to take an abstract space and commodify it for commercial purposes. He affirmed that those with sufficient capital purchase land being developed by the government to make it more profitable and then sell it at an exorbitantly high price.

Prominent architect Fauzia Qureshi attributed the river's poor condition to a decline in water due to the Indus Water Treaty with India and the fact that it had become a dumping ground for Lahore's sewage, which flows into it from the city's myriad minor tributaries. She said that about 70 percent of the area on both sides of the river was agricultural land, while around 2,000 acres comprised forests. While highlighting the project's risk to Mughal-era heritage sites such as Kamran's Baradari and Jahangir's tomb, she said that although the EIA had cleared the former of any kind of risk, the assessment did not even mention the latter, although it is a provisional UNESCO World Heritage Site.

Environmental lawyer Ahmad Rafay Alam underscored the lack of transparency around the RUDA, including its budget, as well as the opaque nature of the project in question with regard to its financing and approval procedures. Environmentalist Vaqar Zakaria reiterated the project's lack of detail, such as the amount of land to be used, its purpose and exact locations. Participants also underscored the absence of a legitimate public purpose behind the project and suggested focusing on the existing city of Lahore and mitigating its damaging environmental impact as well as alternatives to revive the Ravi ecosystem.

When concerns were raised regarding the controversial immunity clause in the RUDA Act 2020, which protects the agency against lawsuits and restricts the jurisdictions of the courts, a RUDA spokesperson claimed that such clauses were 'normal' and referred to Section 4 (2) of the law, which states that the authority 'may be sued.'<sup>11</sup>

## **The project EIA and its counter-assessment**

The EIA of the strategic development plan for RUDA, dated January 2021, describes the 30-year project in detail, outlining the environmental baseline conditions and major project impacts and mitigation measures, and providing an environmental management plan.

Prominent takeaways from the assessment include the following:

- The EIA reveals the presence of **116 fauna** and **147 plant species** in the area.

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<sup>11</sup> <https://www.dawn.com/news/1594417>; <https://www.dawn.com/news/1594626/ruda-act-to-facilitate-project-execution>

- The RUDP's total water requirement is **1,400 cusecs, of which 70 percent will be obtained from groundwater** and the rest from treating canal or river water.
- Almost **77 percent of the site area is agricultural land** while the remaining comprises settlements, forests, river area, orchards, landfills, and barren floodplain.
- Agricultural land over **76,000 acres** will be affected under the 30-year project.
- The total proposed green area in the form of reserved forests, eco-farms, central parks, and botanical garden is 12,172 acres.
- There are **89 settlements/villages** in the project area, of which 20 fall in Lahore and 69 in Sheikhpura.
- There is a risk of **groundwater depletion** once urban structures are raised. **Groundwater quality may also deteriorate** due to construction activities.
- The use of transport vehicles and generators/pumps during construction will **increase air pollution**.

While raising minor impact issues, the EIA claims that the project's strategic development plan is feasible but only at the proposed location if its recommendations/mitigation measures are implemented in 'true spirit.'

Civil society organisations and environmentalists have identified major gaps in the EIA, which could have severe negative impacts if left unaddressed. As for displacement of locals after grossly inadequate compensation, which is scantily addressed in the assessment, they argue that even alternative housing is not the answer since the affected population's means of livelihood will be erased.

Some major concerns vis-à-vis the EIA are as follows:

- Since the project is at an early stage of conception and design, **a full feasibility** is required for a comprehensive assessment.
- The EIA fails to mention important matters such as detailed project costs, construction activities and a sustainability analysis of alternatives, including design alternatives.
- The baseline is outdated and its **data inadequate**, and the social baseline should have maps of the area of the land to be acquired.
- It is unclear how much land and how many other public utilities will be affected by **land acquisition**.
- No estimates of the total amount of **compensation** and cash disbursements are provided.
- The impact of the loss of agricultural land on local incomes and food production is not discussed.
- Stakeholder consultation is poor, with no mention of **input from environmentalists**.
- Consultations with locals should be genuine and **more inclusive**, involving key groups such as women.
- The environmental management plan lacks essential details such as **monitoring mechanisms**.
- Key missing information includes who the affected persons are, how they will be affected, their losses, and on what basis they will be compensated for **loss of livelihood**.
- **Project staff data** is missing and without it, there is no way of knowing or planning for the amount of effluent likely to be emitted by workers' camps or their use of water and its effect on the local population.

- The amount and types of construction material required is missing, as are details of the transport and storage of **hazardous material**.
- Construction equipment details are also missing although it is important to ascertain the extent of **traffic and noise pollution** by knowing how many truck trips will be required
- Concepts such as rainwater harvesting and wastewater treatment have been mentioned only briefly, while there is no mention of **waste disposal** in the proposed ‘medical city.’
- There is no mention of waste recycling facilities or prevention of **solid waste dispersion** in landfills.
- The EIA needs a more quantitative assessment of **expected impacts**. It suggests that the flood risk is low but provides no mathematical reasoning to support his.
- The EIA needs specific commitments on how noise, water and air pollution levels will be controlled, along with traffic.
- Channelisation and waterfront development goes against the principles of **sustainable development**.
- The EIA should specify development densities with affordable costs of construction to give **lower-income groups** access to housing—a ‘priority’ of this government conspicuous by its absence.

Environmentalists fear that the project will encroach on floodplains due to housing construction and irreversibly alter the river’s basic natural landscape if its channelisation is undertaken. After studying the EIA, they have also recommended that RUDA establish sewerage systems and wastewater treatment plants prior to construction so that, at the very least, untreated waste is not discharged into the river.

## **Land acquisition and farmers’ concerns**

The RUDP EIA states that only those villages will be relocated that fall within the riverbed while all other settlements will be retained. According to residents, however, that is not what is happening on the ground.

The EIA adds that the riverbed contains nine settlements (seven in Lahore and two in Sheikhpura) spread over 226.96 acres, comprising 2,966 households and 19,590 persons. To mitigate the impact of their relocation, the EIA lists various options, including cash, land-for-land compensation, model villages, and plots/apartments but does not delve into the crucial details and completely neglects compensation for loss of income vis-à-vis agricultural lands.

In late 2020, the Punjab government began imposing various sections of the Land Acquisition Act 1894, notifying vast tracts of land for the RUDP in Lahore and Sheikhpura.<sup>12</sup> While the law states that a project cannot commence until EIA approval is granted, HRCP observes that this has not been the case with the project in question, as mobilisation and land clearing has already begun.<sup>13</sup> The affected farmers have also accused the government of deceiving them by not following the prescribed timelines, as they were not given the required time to record objections as per the act. Many farmers have already begun to lose their lands and have vowed to resist forcible evictions.

On 25 February 2021, around 60 farmers protested in front of the Punjab Assembly, rejecting the meagre PKR 200,000 per acre compensation they had been offered. Other than the low

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<sup>12</sup> <https://www.dawn.com/news/1600709>

<sup>13</sup> As observed by HRCP’s fact-finding team during its visit to the affected villages on 4 March 2021.

rate, they asserted that their lands were not near the riverbed and thus not liable to be used; they claimed that government officials, in connivance with the 'land mafia', were using the project as an excuse to occupy their land. Some protesters also accused the deputy commissioner of having strangers pose as local farmers at a recent consultation in Bangla Chouhan village to prove that residents supported the project. They alleged that thousands of police officers, under the command of the Ferozewala police force, had been stationed near their villages as a pressure tactic to force them into selling their lands.

The protesters also complained that they had not been informed of any plans for their relocation or substitute means of livelihood. They fear that, if the government acquires their lands, they will not only become homeless but also be deprived of income, leaving their families without a roof over their heads and no means to survive.

On 26 February 2021, HRCP and civil society members met affected landowners at a consultation as part of the fact-finding mission. The farmers were concerned about the social and legal consequences of violating the Land Acquisition Act and feared the population of Lahore would blame them for opposing the idea of raising the city's water table – as the RUDP supposedly envisages. More importantly, they stated that they were not against the river's channelising or refurbishment as long as their lands were not taken from them on the pretext of 'development'.

Noting that those whose lands were at risk were in agreement, they suggested that the best recourse was to fight RUDA in court alongside public pressure and vowed they would resist the project since it was a matter of their livelihoods. They sought assistance in contesting the case by using qualified, experienced lawyers.

Since then, farmers have continued their protests<sup>14</sup> and vowed to resist the project.<sup>15</sup> The matter has also reached the court, where hearings are underway. Multiple petitions against the RUDP have been filed before the LHC and all eyes are on the court to see if any relief is given on legal grounds.

On 26 February 2021, LHC Justice Baqar Ali Najafi temporarily stayed RUDP's acquisition of agricultural land. On 4 March, LHC Justice Shahid Karim halted land acquisition temporarily while hearing a petition contending that no EIA had been carried out before acquisition notices were issued. The judge also took notice of land acquisitions despite a stay order and restrained the government from any such action until the EIA was approved.<sup>16</sup>

Earlier, Justice Karim had directed the Punjab government to engage an international consultant to conduct the EIA instead of a local one. Similarly, on 18 February, LHC Justice Shams Mirza had restrained the Punjab Environment Protection Agency (EPA) from passing any final order on the EIA. The petition was filed by the Public Interest Law Association of Pakistan on the grounds that Engineering Consultancy Services Punjab (Pvt) Ltd, which carried out the EIA, is not registered with the EPA and that this contravenes the prescribed rules.

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<sup>14</sup> <https://twitter.com/TabbySpence8/status/1366698484469030919?s=20>

<sup>15</sup> <https://www.dawn.com/news/1610536/farmer-bodies-want-islands-ordinance-revoked>

<sup>16</sup> <https://www.dawn.com/news/1610741/ravi-riverfront-project-lhc-takes-notice-of-land-acquisition-despite-stay>

### *History repeats itself*

While hearing a case against RUDP's land acquisition on 4 March 2021, LHC Justice Shahid Karim observed that people's lives had been shattered by the acquisition of their properties for the Orange Line Metro Train (OLMT), which began operating in October 2020 at a cost of USD 1.8 billion.

At an EIA hearing for the OLMT project in July 2015, affected residents had complained of the lack of information regarding compensation. Earlier, on the completion of the EIA, activists had criticised authorities for failing to put in place adequate measures to control air pollution.

Media reports also stated that demolitions began without any compensation being awarded: some landowners were not paid for several months and even years, and those resisting were evicted through pressure tactics, while others were forced to sell their homes for less than the market value after taking the PKR 1 million compensation. Moreover, issues of risk to heritage sites were brushed aside by the government and later sanctified by the Supreme Court.

Similarly, in 2014, the EIA hearing of the Rawalpindi Islamabad Metro Bus Project was held after work had already started on the project and was subsequently approved—against the prescribed rules. Similar events followed during the construction of major development projects in Islamabad.

### *On the ground*

HRCP conducted its first field visit to the affected villages on 4 March 2021 to hear first-hand the experiences of villagers vis-à-vis the land acquisitions.

Muslim League Village has between 250 and 300 houses of around 4 *marlas* each, with an average household comprising four to five persons. On 1 March, the deputy commissioner issued the villagers a 15-day notice to evacuate (see Appendix 1).

'I am a single mother raising six children and live with my sister-in-law. I received the deputy commissioner's notice a couple of days ago, directing us to vacate the land. But even weeks before this, *patwaris* (land revenue officials) had been pressuring us to evacuate. With no source of income but the land we live off, we will be devastated if we have to leave. The compensation rate is not enough to put a roof over our heads, let alone pay for my children's school fees.'

*Rukhsana, resident of Muslim League village*

Gul Nawaz is a schoolteacher who lives in a three-*marla* house with six family members in Muslim League village. He took HRCP's fact-finding team<sup>17</sup> around the nearby agricultural land, which appeared fertile and is reportedly known for its high-quality crop. Nawaz claimed that the public hearing in February headed by the deputy commissioner was stacked by 'fake' farmers who had only been brought in to agree with the government.

Local farmer Kamran Tabassum complained that no one from the government had come to their aid, adding that only provincial lawmakers from the opposition had visited them to express solidarity and listen to their grievances. He claimed that the government had not clearly defined the riverbed areas, which was why they were clearing settlements far from the river.

Aya Nagar Khurd is opposite Muslim League village; it is here that the army-run Frontier Works Organisation (FWO) has set up its base camp (see Appendix 2) and land acquisition has taken place. Locals informed HRCP that around six acres of land had already been cleared

<sup>17</sup> The fact-finding team also included a local teacher, Nazeer Awan, who acted as the team's focal point.

by the FWO without any prior indication to residents. Residents Haq Nawaz and Fakir Muhammad both lost their land after it was forcibly bulldozed by the FWO and were threatened when they resisted. HRCP witnessed activity at the FWO camp but none of the officials present responded when approached for comment.

Despite farmers' protests and civil society's concerns regarding evictions, RUDA officials continue to paint a different picture.

On 12 November 2021, RUDA chairman Rashid Aziz denied that any forcible evictions had occurred and claimed that 'locals shall be part of the future city becoming really rich [sic].'<sup>18</sup> In the following weeks, RUDA spokesperson S. M. Imran clarified that, in the first phase, they would develop only vacant land and that there was special consideration to avoid relocation, adding that the prime minister had categorically directed the authority not to disturb industries and residential areas not in the way of the river's realignment.<sup>19</sup> Later, at a press conference on 18 January 2021, Imran – who is also the vice-chair of the Lahore Development Authority – said that only 5–7 percent of all settlements on the riverbed and at risk of flooding would be moved.<sup>20</sup>

Similarly, in an interview on 4 January 2021,<sup>21</sup> the RUDA chairman recalled his response when, during the project's inauguration, someone had suggested removing locals and their livestock with ease. 'I will relocate and not displace them by incorporating those with livestock in the dairy and agri zones of the new city,' he remembered saying, adding that one had to deal with people with compassion and not force.

Discussing farmers' compensation, Aziz stated<sup>22</sup> on 1 March 2021 that, whenever and wherever governments acquired land, people would try to have their lands assessed at higher rates. He added that local reservations would be addressed amicably and the city would be built as planned.

## Conclusion

Along with its civil society partners, HRCP stands firmly with the affected landowners and supports all measures to keep this project from irreversibly damaging the environment.

Following its fact-finding mission, HRCP concludes the following:

- Rather than resolving the problems that plague Punjab's capital, the government wishes to divert attention to developing a new model city.
- Contrary to the government's claims, as of now it appears that the RUDP will neither help provide affordable housing to the needy or improve the local environment. In fact, the development will render homeless poor farmers and their families who rely on agricultural production and ruin the little fauna and flora that remains in the Ravi basin.
- RUDA has completely disregarded the human cost of its 'development' to local farmers and failed to present any sustainable alternative to their relocation/livelihood loss.

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<sup>18</sup> <https://twitter.com/rashidazizpak/status/1326643822831562758?s=20>; <https://twitter.com/rashidazizpak/status/1326632505257189377?s=20>

<sup>19</sup> <https://twitter.com/SMIImranPK/status/1329849762166738947?s=20>; <https://twitter.com/SMIImranPK/status/1342864182673289219?s=20>

<sup>20</sup> <https://twitter.com/GovtofPunjabPK/status/1351131554135859200?s=20>

<sup>21</sup> <https://youtu.be/9FABvd6c24I>

<sup>22</sup> <https://nation.com.pk/01-Mar-2021/ravi-riverfront-project-aimed-at-fighting-water-recession-aggression-ruda-chairman>

- Instead of ensuring more inclusiveness in the project by involving locals, the government is attempting to strongarm farmers into selling their lands by involving the army-run FWO for development work and deploying police to the area as a harassment tool.
- Lessons must be drawn and counter-measures proposed, based on similar evictions and compensation issues during earlier projects such as the OLMT project in Lahore.
- It appears that the government—under the influence of special business interest groups—is aiming to use the project for short-term economic growth to benefit a select few at the cost of dislocating thousands of villagers with nowhere to go, and damaging the environment
- The EIA must be undertaken again by a more competent, independent organisation and cover the issues raised by experts.
- The media has so far failed to give the issue the prominence it deserves and must be taken on board, both during coverage of events such as protests and court hearings, and special features.

## Recommendations

After input from the relevant stakeholders, most importantly the affected landowners and inhabitants, and in consultation with environmental experts, HRCP proposes the following:

- Immediately stop all development work in the area, including land acquisition, until the EIA is revised with input from all stakeholders, including landowners, and compensation issues settled satisfactorily.
- Details of all evictions and land acquisition already carried out or in the pipeline need to be shared with the public, along with testimonies from affected persons.
- No forcible occupation of land should take place and no pressure tactics used to buy land.
- Adequate compensation measures must be ensured, including alternative income support.
- The use of force against protesting farmers must cease and cases against them withdrawn.
- A representative body of affected farmers should be created so that their concerns are better highlighted.
- If farmers' lands have been forcibly occupied or they have been manhandled, criminal complaints should be lodged on their behalf.
- Measures to channelise the river and raise the water table may be carried out so long as the affected farmers are taken on board and input from environmental experts is sought.
- Various legal challenges to the project can be put up:
  - The creation of RUDA could be challenged as the establishing legislation grants it unprecedented power and cross-sectional reach, encroaching on municipal authorities.
  - Since no rules or regulations for the authority have been prescribed, RUDA's work can be challenged as having been done arbitrarily.
  - RUDP could be challenged on the basis of the doctrine of public trust, which has been upheld by the Supreme Court. This states that anyone can file a petition against a project on the grounds that its development is not in the public interest.

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- If reports of the government buying land at district collector rates and then selling it to private developers at ten times the price are true, then the land acquisition could be challenged legally.
- Alternatives such as developing a national park instead of the RUDP could be explored in line with earlier work by experts, including the River Ravi Commission.
- Social media platforms should be widely used to collectively oppose the environmental degradation that the project will bring forth and to identify influential partners to raise awareness of the issue.
- Civil society groups should take a firm, united stand and help farmers in their struggle against state oppression, given that HRCP believes mainstream political parties have failed the poor.
- A wide-ranging consultative process discussing the need for, and impact of, the project – rather than short-term gains benefitting real estate lobbies – should precede such ventures.

HRCP would also like to remind Prime Minister Imran Khan of his earlier stance in 2013, when he had vehemently opposed the then prime minister Nawaz Sharif's plan of establishing a 'New Islamabad' city cutting across the Margalla Hills, along with a highway styled along the lines of Dubai's Sheikh Zayed Road. He was quoted as saying that the federal government was 'succumbing to the greed of developers' and ignoring the project's repercussions for the environment, and that 'we need to give priority to the preservation of our environment and must respect the environment preservation laws. This is our future generation's legacy and we have a responsibility to preserve it.'<sup>23</sup>

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<sup>23</sup> <https://www.dawn.com/news/1042541>



## Appendix 2: FWO camp in Aya Nagar Khurd village

