

# INCEPTION REPORT

ON

## ESTABLISHMENT & OPERATIONALIZATION

OF

### KHYBER PAKHTUNKHWA MINERALS DEVELOPMENT AND MANAGEMENT COMPANY LIMITED (KP-MDMCL)

(A Public Limited Company formed under the relevant provisions of the Companies Act, 2017)

*Submitted to*



## MINERALS DEVELOPMENT DEPARTMENT

Government of Khyber Pakhtunkhwa

**May-2025**

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## DOCUMENT CONTROL

### DOCUMENT TITLE

<b>Document</b>	Inception Report
<b>Document Status</b>	Submission to the Secretary to Government of Khyber Pakhtunkhwa Minerals Development Department
<b>Abstract</b>	<p>This document presents the strategic vision and foundational context for the establishment and operationalization of the Khyber Pakhtunkhwa Minerals Development and Management Company Limited (KP-MDMCL), a Public Limited Company incorporated in September 2024 under the Companies Act, 2017. The consultancy assignment aims to make the Company fully functional through the preparation of key strategic and operational deliverables, including a forward-looking Business Plan, a comprehensive Legal and Regulatory Framework Report, an HR Plan and Organizational Structure, a Financial Model and Investment Strategy, and a Sustainability and Environmental Management Plan. The assignment will culminate in the submission of a Final Consolidated Report, which will serve as a roadmap for the Company's operationalization, anchored in the tentative Business Plan, HR Manual, and supported by the other core deliverables. Post-Consultancy Support Services are also intended to assist in the early-stage implementation and transition to full-scale operations.</p>

### SUBMISSION DETAILS

Date	Author	Version	Remark
May 28, 2025	IECnet S.K.S.S.S., Chartered Accountants & Management Consultants	Final	The Inception Report is being submitted to initiate deliberations and formalize the execution protocols.

### DISTRIBUTION

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### CONFIDENTIALITY

This Inception Report is intended to serve as a foundational reference for understanding the consultant's proposed approach to the establishment and operationalization of the Khyber Pakhtunkhwa Minerals Development and Management Company Limited (KP-MDMCL). Accordingly, the contents of this report may only be shared or reproduced with relevant stakeholders or associated entities, subject to prior authorization from the Minerals Development Department, Government of Khyber Pakhtunkhwa.



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**Section-01****EXECUTIVE SUMMARY**

The project titled “*Establishment and Operationalization of the Mineral Development Company (MDC)*”, formally known as Khyber Pakhtunkhwa Minerals Development and Management Company Limited (KP-MDMCL), has been initiated by the Minerals Development Department (MDD), Government of Khyber Pakhtunkhwa. The overarching objective of this initiative is to establish a fully-functional, efficient and sustainable corporate entity capable of unlocking and managing the province’s considerable mineral potentials. To achieve this vision, IECnet Pakistan has been engaged to provide end-to-end technical and strategic support throughout the operationalization process.

The assignment encompasses a broad range of deliverables aimed at creating an economically and financially viable institution. These include the preparation of a comprehensive feasibility study, the development of a detailed business plan and operational roadmap, formulation of an appropriate legal and regulatory framework and the design of a forward-looking institutional and environmental sustainability strategy. The consultancy also addresses key institutional support mechanisms and capacity-building needs essential for the long-term success of KP-MDMCL.

As part of the inception phase, IECnet Pakistan conducted a robust desk review, combining document analysis with direct interactions and observations of key institutional processes. This involved an in-depth examination of the current organizational and governance structures within the Minerals Development Department and its attached entities, including the Directorate of Mines and Minerals, the Inspectorate of Mines, and the Commissionerate of Mines, GoKP. The legal and policy landscape was comprehensively reviewed, focusing particularly on the Khyber Pakhtunkhwa Mineral Development Policy and Strategic Action Plan–2022, the Khyber Pakhtunkhwa Minerals Development Bill – 2025, *the* KP Mines and Minerals Act, 2017 (as amended in 2019), *the* Safety, Inspection and Regulation Act, 2019, and the Excise Duty on Minerals (Labor Welfare) Act, 1967. These instruments provided critical insights into the regulatory and institutional frameworks currently governing mineral development in the province.

Building upon this foundational review, IECnet Pakistan is in the process of finalizing the core deliverables. These include a detailed business plan outlining KP-MDMCL’s strategic direction and operational objectives; a comprehensive Human Resource Management Plan, inclusive of a tailored HR Manual; a legal and regulatory framework customized for the company’s functional needs; a financial management and investment strategy; and an environmental sustainability and management plan. These outputs will not only guide the company’s formation but also ensure its alignment with national laws and international best practices. In addition to these primary deliverables, IECnet will support KP-MDMCL during its initial operationalization phase. This includes assisting the company in obtaining the Certificate of Commencement of Business from the Securities and Exchange Commission of Pakistan (SECP), advising on recruitment of key personnel and facilitating smooth initiation of company operations.



As part of post-consultancy engagement, IECnet will extend advisory support for the identification and development of other critical operational documents, such as an operational manual, and conduct feasibility studies for prospective mineral projects on a rolling basis and under future engagement frameworks. This ongoing support is aimed at ensuring the continuity, scalability and institutional sustainability of KP-MDMCL in line with the broader development vision of the Government of Khyber Pakhtunkhwa.

**IECnet Pakistan**

May 28, 2025

## INTRODUCTION

The introductory part of the inception report covers the following:

- Background and Context
- Purpose of the Inception Phase
- Structure of the Report

### 1. Background and Context

The Government of Khyber Pakhtunkhwa, through the Minerals Development Department (MDD), has embarked on a major institutional reform initiative aimed at transforming the province's mineral sector into a structured, commercially viable, and professionally managed industry. This vision is being realized through the establishment of the Khyber Pakhtunkhwa Minerals Development and Management Company Limited (KP-MDMCL), a dedicated, government-owned corporate entity mandated to promote investment, enhance governance, and unlock the full economic potential of mineral resources across the province. Recognizing the complexities inherent in mineral development, including legal, environmental, institutional, and financial challenges, the government has appointed IECnet Pakistan to support the operationalization of KP-MDMCL through a structured consultancy. The assignment is expected to guide the transition from policy intent to institutional reality by providing a comprehensive operational roadmap, legal and regulatory instruments, and institutional mechanisms necessary to ensure that the company becomes a sustainable and functional entity capable of delivering long-term socioeconomic benefits to the region.

*A key structural challenge lies in the existing governance model, wherein the Minerals Development Department (MDD) and its attached-departments simultaneously perform both regulatory and operational roles. This duality has led to perceived conflicts of interest, diminished regulatory transparency and suboptimal utilization of the province's mineral resources. As part of the ongoing reforms agenda, it is understood that the government aims to minimize its direct involvement in commercial functions by shifting its focus toward policy formulation and regulatory oversight. Core operational responsibilities, such as mineral exploration and development, asset management, support for royalty-collection, and the investors' facilitation functions previously assigned to the Mineral Investment Facilitation Authority (MIFA), particularly in attracting both local and foreign investment, are expected to be delegated to the newly established KP-MDMCL.*

*In this context, KP-MDMCL is envisioned to operate as an umbrella organization, enabling structured engagement with the private sector and serving as the central institutional platform for the promotion and sustainable development of mineral resources in Khyber Pakhtunkhwa. Its establishment is aligned with the strategic objectives outlined in the KP-Mineral Development Policy and Strategic Action Plan–2022, which emphasizes the separation of regulatory and commercial functions, the promotion of public-private partnerships (PPPs), the safeguarding of environmental and community interests, and the enhancement of institutional efficiency.*

## 2. Purpose of the Inception Phase

This inception phase consolidates the findings of a detailed desk review to establish the legal, institutional, and policy foundations for the operationalization of the Khyber Pakhtunkhwa Minerals Development and Management Company Limited (KP-MDMCL). Consequently, it serves as foundational stage for sharing eventual deliverables with an opportunity to refine the approach based on a critical review of the existing documentation. Envisioned as one of the province’s largest public sector entities, KP-MDMCL will function as a Public Limited Company under a robust corporate governance framework. The review assessed the statutory basis for incorporation, regulatory compliance requirements, and the company's alignment with existing provincial institutions, particularly the Directorate of Mines and Minerals, to ensure clear functional delineation and institutional synergy. Within the broader reform agenda of the Government of Khyber Pakhtunkhwa, this inception work is pivotal to advancing governance reforms, attracting structured investment, and separating regulatory oversight from commercial functions. By identifying legal and operational gaps, as a result of the desk reviews, and proposing actionable reforms, the report lays the groundwork for KP-MDMCL to emerge as a credible and strategically positioned vehicle for mineral sector development.

## 3. Structure of the Report

Section	Description
Executive Summary	<i>A concise overview of the assignment, key findings, and the proposed way forward.</i>
Introduction	<i>Provides the contextual background, outlines the purpose of the inception phase, and report structure.</i>
Assignment Objectives	<i>Articulates the primary and specific objectives of the consultancy.</i>
Scope of Work	<i>Describes the key thematic areas and components to be addressed throughout the assignment.</i>
Methodology and Approach	<i>Details the methodological framework and execution approach adopted for the assignment.</i>
Desk Review Findings	<i>Summarizes key insights from the legal, institutional, and policy landscape reviewed.</i>
Findings against Other Deliverables	<i>Presents preliminary content and frameworks for business planning and HR strategy.</i>
Deliverables and Work Plan	<i>Outlines the timeline, milestones, and key outputs for successful completion of the assignment.</i>
Key Assumptions and Risks	<i>Identifies major internal and external risks and proposes mitigation strategies.</i>
Roles and Responsibilities	<i>Defines the roles of the consulting team, client, and other key stakeholders, including coordination mechanisms.</i>
Annexures	<i>Includes supporting documents, reference materials, and supplementary information relevant to the assignment.</i>

#### 4. The Project Team Conference

Immediately upon the signing of the agreement on April 23, 2025, a formal Kick-Off Meeting was convened between the Project Team and top-tier management of the Minerals Development Department (MDD), Government of Khyber Pakhtunkhwa. The Department was led by the Secretary, MDD, who outlined the strategic rationale for engaging management consultants to support the establishment and operationalization of the Khyber Pakhtunkhwa Minerals Development and Management Company Limited (KP-MDMCL). In doing so, the worthy Secretary highlighted the pressing challenges currently facing the mineral development sector, along with the evolving priorities of the provincial government at this critical juncture.

The purpose of the meeting was to formally introduce the core consulting team, reaffirm the scope of the engagement, agree on communication protocols; and review proposed work plan for the inception and initial implementation phases until issuance of the final roadmap report(s). The session facilitated a shared understanding of key timelines, deliverables, and mutual expectations and also helped identify critical stakeholders to be engaged throughout the course of the assignment.

Constructive feedback and strategic input provided by the departmental leadership during the session have been duly incorporated into the refined execution framework presented in the Inception Report. The meeting concluded on a positive and forward-looking note, with a vote of thanks from both sides and a formal accord to proceed with the kick-off of project activities in accordance with the agreed roadmap.



## ASSIGNMENT OBJECTIVES

The project titled “Establishment of the Mineral Development Company (MDC) Khyber Pakhtunkhwa” includes both a Primary Objective and a set of Specific Objectives. While both are interconnected and essential to the project's success, they differ in scope and purpose.

### 1. Primary objective

To support the establishment of a fully functional MDC, formed under the name and style of Khyber Pakhtunkhwa Minerals Development and Management Company Limited (KP-MDMCL);

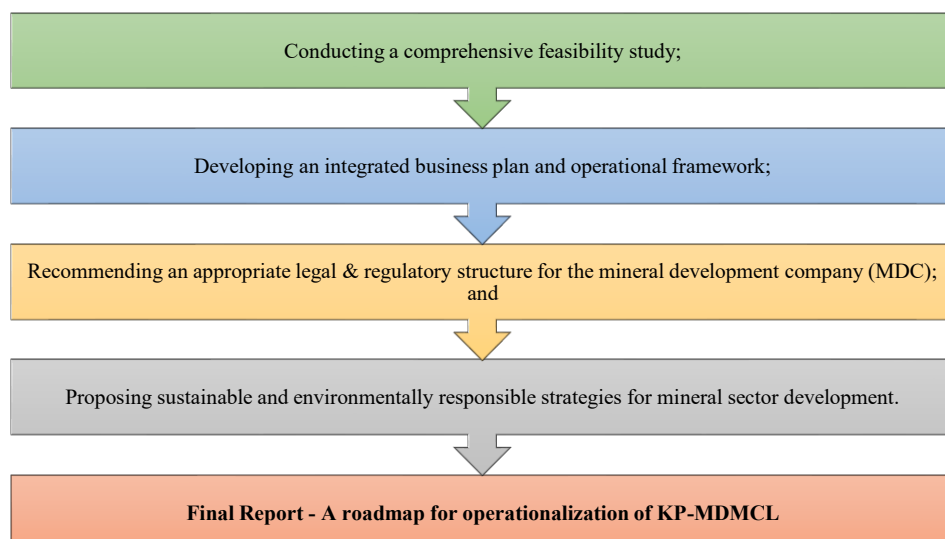
### 2. Specific objectives

The specific objectives of the assignment in hand, are briefly described as follows:

- ❖ *Conducting a feasibility study for the establishment of the KP-MDMCL*
- ❖ *Developing a comprehensive business plan and operational framework*
- ❖ *Recommending a legal and regulatory structure for MDMC*
- ❖ *Proposing sustainable and environmentally responsible development strategies*

### 3. Strategic vs. Operational Focus

The Primary Objective is strategic in nature. It defines what is to be ultimately achieved, the creation of MDMCL as a sustainable and effective institution. On the other hand, specific objectives are operational and tactical in nature, outlining the means through which the primary objective will be accomplished. These objectives translate the overarching goal into actionable steps and tangible deliverables to be provided by the consultants. They include: (a) conducting a comprehensive feasibility study as a roadmap for the establishment and operationalization of KP-MDMCL; (b) developing an integrated business-plan and operational framework; (c) recommending an appropriate legal and regulatory structure for the KP-MDMCL; and (d) proposing sustainable and environmentally responsible strategies for mineral development through KP-MDMCL.



## SCOPE OF WORK

This Inception Report outlines the preliminary understanding and structuring of the scope of work to be undertaken by *IECnet Pakistan (the "Management Consultants")* under the assignment. It is important to note that, as is standard practice, the scope of work is inherently confined to the Terms of Reference (TORs) and Standard Bidding Documents (SBDs), which shall be complied with in both letter and spirit throughout the consultancy. This report is intentionally focused on highlighting the key thematic areas identified for implementation, in line with the MDD's expectations and the agreed contractual framework. The scope of work comprises the following core components:



### 1. Desk Review

Desk review is the foremost essential step of the **'scope of work'** outlined for the entire assignment. IECnet Pakistan completed its initial desk review by studying and reviewing the existing organizational and governance structure of MDD and its attached departments. While it has adequately covered the review of the Mineral Policy & Strategic Action Plan- 2022 and also the laws and regulations in field, it also successfully completed a study demonstrating comparative analysis of the companies already incorporated and established in Pakistan in other provinces working in the same regime and model. A full-fledged desk review report (DRR) containing over 80 pages in all, forms an integral part of this inception report.

### 2. Business Plan Development

The scope of work envisages the next very important deliverable, the development of Business Plan, which the consultants intend to formulate tailored to the MDD's strategic vision for KP-MDMCL, incorporating market dynamics, operational models, institutional roles and realistic implementation timelines. The aforementioned document shall include organization and governance structure of KP-MDMCL besides addressing operational processes comprising exploration, mining, extracting and commercialization of minerals, being the core activities.



### 3. Legal and Regulatory Framework

At the desk review stage, a comprehensive preliminary assessment of the existing legal structure has been conducted, with key findings documented in the Desk Review Report (DRR). However, we intend to revisit and further analyze the legal framework, with particular focus on advising the most suitable structure for the Minerals Development Company (MDC), whether as a wholly state-owned entity or through a Public-Private Partnership (PPP) model, in alignment with the prevailing mineral sector laws of the province. This analysis will also benchmark against international best practices to ensure legal robustness and operational viability. With respect to regulatory requirements, our support will include detailed guidance on applicable permits, licenses, and statutory approvals, along with the identification of any potential regulatory overlaps or conflicts of interest that may impede efficient operations.

### 4. Financial Management and Investment Strategy

Being the most critical pillar of the entire assignment, IECnet Pakistan fully recognizes that no project can sustain over the long term unless it is financially and economically viable. Indeed, in today's global landscape, virtually no initiative is devoid of financial implications. The proposed venture will inevitably entail significant fiscal responsibilities for all stakeholders—foremost among them, the Government of Khyber Pakhtunkhwa. In line with the requirements outlined in SBDs, IECnet Pakistan will undertake the development of a detailed financial model that identifies and analyzes potential funding sources, including but not limited to, government budgetary allocations, private sector investments, blended financing mechanisms, and donor-supported schemes. The model will project revenue streams, operational and capital costs, and profitability scenarios under various structuring options, particularly hybrid PPP arrangements and other financing models deemed appropriate for the mineral development sector. Considering the nature of industry, IECnet Pakistan thinks it appropriate to develop Mineral Development Fund, out of the savings from Royalty Collection at present, which the provincial government, especially Finance Department, could be convinced to allocate this particular fund like KP Hydel Development Fund, for the sector's promotion and exploration projects, through KP-MDMCL. Nonetheless, our approach will include stress testing of assumptions, scenario analysis and risk mitigation measures to ensure the financial model is both resilient and adaptable to market and policy fluctuations. This will ultimately guide decision-makers on the financial feasibility and bankability of the proposed operational structure for KP-MDMCL.

### 5. Sustainability and Environmental Considerations

IECnet Pakistan, through its dedicated Environmentalists and Geologists will develop strategies for environmentally sustainable mineral development by aligning operations with UN Sustainable Development Goals (SDGs), mitigate adverse environmental impacts and proposing strategies for social responsibility and local engagements. In this connection, we are at the initial stages for a better understanding recommendable for KP-MDMCL.

### 6. Capacity Building and Institutional Support

This assignment necessitates the formulation of a robust Human Resource (HR) structure, including the identification of essential staffing needs, clearly defined roles and responsibilities, required qualifications, and Key Performance Indicators (KPIs). In addition, recommendations will be made for suitable technologies relevant to mineral exploration and processing, along with guidance on means of procurement and sources of innovation. With respect to institutional support, we will assess and outline the institutional arrangements and external support mechanisms essential for the successful establishment and operationalization of KP-MDMCL.



IECnet Pakistan has already developed a preliminary organogram reflecting the governance structure of KP-MDMCL and has proposed an initial list of required personnel. However, in the absence of concrete information regarding specific projects and their respective geographic locations, a precise determination of overall human resource needs remains subject to further assessment. Work has also commenced on the development of a comprehensive HR Manual, which will be finalized following stakeholder workshops and interactive consultations to ensure consensus-based, contextually relevant outcomes.

7. **Final Reporting – Roadmap for Operationalization**

The Final Report will comprehensively address all areas outlined in the TORs/SBDs, culminating in a practical and actionable Roadmap for the operationalization of KP-MDMCL. This report will synthesize findings, recommendations, and implementation strategies across all components of the assignment, ensuring alignment with the project’s objectives and stakeholder expectations.



## METHODOLOGY AND APPROACH

The methodology for establishing and operationalizing KP-MDMCL is designed to ensure a structured, inclusive and strategic rollout across all phases of the assignment. The approach focuses on vigorous planning, stakeholder alignment, institutional capacity building, and timely regulatory compliances, including the processing and obtaining the Commencement of Business Certificate from the Securities and Exchange Commissioner of Pakistan (SECP). This part of inception phase covers the following:

1. Execution Strategy
2. Methodological Framework
3. Stakeholder Engagement Plan

1. Execution Strategy

The execution strategy will follow a phased and milestone-based plan aligned with best practices in public sector corporate setup, ensuring agility, regulatory compliance, and stakeholder inclusion. The phases are:

**Phase-I: Inception and Planning**

- Conduct a comprehensive situational analysis to understand existing Organizational and Governance Structure of the MDD and its allied attached departments;
- Map stakeholder expectations and align project scope accordingly.
- Initiate legal processes for pursuing issuance of the Commencement of Business Certificate from SECP;
- Develop an implementation roadmap outlining tasks, responsibilities, timelines, and resources.
- Ensure synchronization with KP Government’s mineral policy and governance objectives.

**Phase-II: Capacity Building & HR Manual**

- Develop a contextually relevant HR Manual covering recruitment policies, organizational hierarchy, code of conduct, employee benefits, and performance appraisal.
- Conduct a training needs assessment for the newly established company
- Design and execute capacity-building workshops focusing on corporate governance, project management, and mineral sector operations.

**Phase III: Development of Business Plan**

- Draft a comprehensive **Business Plan** that includes sectoral outlook, strategic positioning, SWOT analysis, financial projections, and investment models.
- Align the business strategy with national and provincial mineral development goals, sustainability standards, and public-private partnership models.

## Phase IV: Implementation Framework & Institutional Setup

- Finalize the governance model including roles of the Board of Directors, Board Committees, Central Procurement Committee and management down the line.
- Define functional departments and establish reporting lines and Standard Operating Procedures (SOPs).
- Establish KP-MDMCL's operational presence including office setup, ICT infrastructure, and administrative support systems.
- Ensure onboarding of key staff and rollout of institutional performance tools.

### 2. Methodological Framework

The methodology is guided by a Results-Based Management (RBM) and Participatory Planning approach, structured into the following components:

Diagnostic Assessment: Baseline analysis using existing data, stakeholder interviews and legal documentation review.

Design and Development: Formulation of HR Manual to start with, and extend guidance to the company's management to identify need for creation of additional policies, procedures, manuals and frameworks tailored to KP- MDMCL's operational requirements on future engagement basis.

Validation and Review: Presentation of drafts to key stakeholders for inputs and revisions.

Implementation Support: Advisory support during execution including preparation of internal policies and regulatory submissions.

Monitoring and Feedback Loops: Use of milestone-based reviews and performance tracking mechanisms for timely course correction.

### 3. Stakeholder Engagement Plan

The success of KP-MDMCL depends on the buy-in and coordination with a diverse group of stakeholders, both internal and external. Our engagement strategy comprises the following:

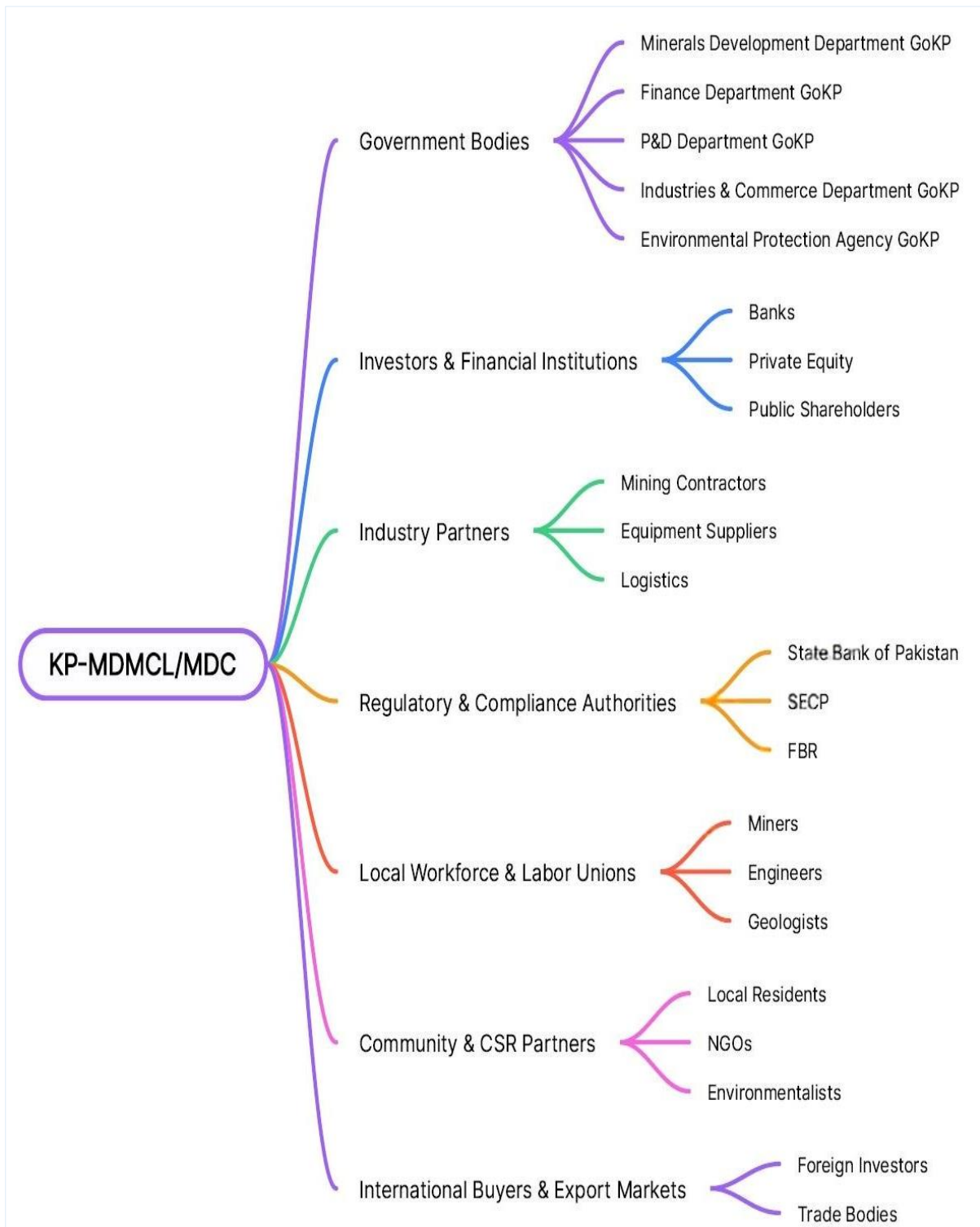
Stakeholder Identification & Mapping: Classify stakeholders based on influence and interest including the Directorate of Mines & Minerals, GoKP, Inspectorate and Commissionerate of Mines, GoKP, private sector investors, regulatory bodies, and community representatives.

Engagement Platforms: Kick-off Meetings with relevant departments for alignment. Workshops and Seminars for consensus building on operational policies and governance structures. One-on-One Consultations with SECP and legal advisors to expedite regulatory approvals. Advisory Group Formation comprising public sector, private sector, and legal experts to provide strategic direction and oversight.

Feedback Integration: Develop structured feedback tools (e.g., surveys, feedback forms) to capture inputs from stakeholders.

Incorporate feedback in draft documents and share final versions for endorsement.

Communication Strategy: Periodic updates through email bulletins, presentations, and meetings. Maintenance of a document repository and stakeholder log to ensure traceability and transparency.



## KEY FINDINGS FROM DESK REVIEW

The Initial Desk Review represented a critical starting point of the assignment and was identified as the foremost requirement under the scope of work. This phase laid the foundation for all subsequent activities by enabling a comprehensive understanding of the existing institutional, policy, legal, and comparative landscape of the minerals sector in Khyber Pakhtunkhwa (KP). The desk review was conducted with the objective of establishing a knowledge base and analytical context for proposed institutional reforms and strategic interventions. Considering the importance and detailed requirement of the desk review, a full-fledged and standalone report spanning 90 pages has been meticulously developed. This report provides in-depth analyses, findings, observations, and recommendations emerging from the review process. It also includes relevant annexures, comparative matrices, and legal references for further study. The scope of this **review** focused on the following core components:



### 1. Existing Organization & Governance Structure of MDD

As previously mentioned, a comprehensive Desk Review Report (DRR) has been compiled, with Section II (pages 10 to 30) specifically addressing this aspect in detail for thorough perusal, reference, and record. This section primarily examines potential areas where KP-MDMCL can support the Government of Khyber Pakhtunkhwa in assuming control of commercial activities currently managed by the Directorate of Mines and Minerals, as well as the Inspectorate and Commissionerate of Mines. While key recommendations are presented on page 30 and further elaborated on pages 71 to 73 of the DRR, a summary of these recommendations is also provided at the conclusion of this section for ease of reference.

### 2. KP Minerals Development Policy & Strategic Action Plan–2022

We have studied the Mineral Policy as well as the Action Plan–2022, with particular reference to assess the prospects of the Khyber Pakhtunkhwa Mineral Development and Management Company Limited (KP-MDMCL), and found that the policy framework and strategic directives present substantial opportunities for KP-MDMCL to play a pivotal role in unlocking the province’s mineral potential analysis, summarized in the table below, which highlights critical areas where KP-MDMCL can align its operational focus to maximize value creation, ensure regulatory compliance, and attract sustainable investment.

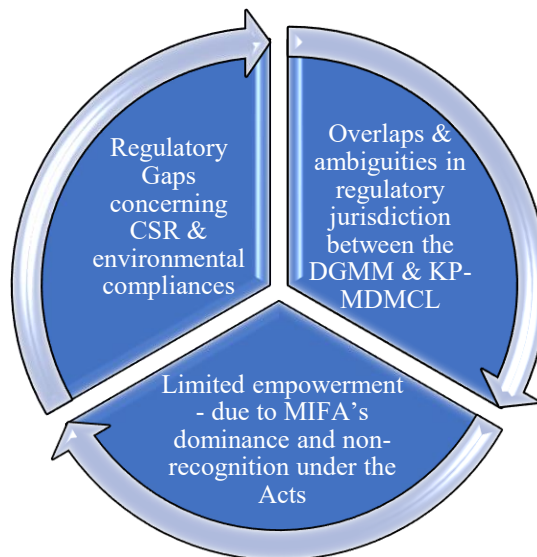


S#	Recommendation	Objective	Proposed Action	Responsible Entity
1	Align Structure with Policy Mandate	Ensure KP-MDMCL fulfills its strategic role per KP Mineral Policy	Develop an institutional charter aligned with commercial and supportive functions	Planning/Legal Teams
2	Define KP-MDMCL as Commercial Arm	Enable the company to operate distinctly from regulators	Formalize operational boundaries and areas of jurisdiction	Mines Dept. & KP-MDMCL
3	Regulatory Stakeholder Engagement	Avoid overlap and ensure coordination	Sign MoUs or engagement protocols with regulatory bodies	KP-MDMCL & Directorate/Inspectorate
4	Public-Private Partnership (PPP) Framework	Mobilize investment and joint development ventures	Draft and adopt PPP policy tailored to mineral sector	Legal & Commercial Teams
5	HR Capacity Building Plan	Ensure availability of qualified sector-specific staff	Prepare HR Manual, conduct gap assessment, and initiate recruitments	HR & Board of Directors
6	Launch Pilot Commercial Projects	Demonstrate early success and generate revenue	Identify 2–3 mineral blocks and initiate commercial pilot projects	KP-MDMCL Technical Team
7	Develop Tech & Data Infrastructure	Improve transparency, investor confidence, and operational readiness	Procure GIS tools, establish digital mining registry and data centers.	IT Cell & Mineral Mapping Unit
8	Establish Legal & Compliance Unit	Ensure conformity with regulatory frameworks	Set up legal cell and ensure compliance with SECP, labor, and environmental laws	Legal Advisor & Company Secretary

(Note: The management of KP-MDMCL, under the leadership of its CEO, is encouraged to evaluate the relevance of these recommendations in alignment with the company’s strategic vision and to set appropriate timelines for their implementation.)

### 3. Existing and Emerging Legal and Regulatory Frameworks

We have adequately reviewed and analyzed the laws and regulations in Pakistan with particular reference to the compliances obligations at the KP-MDCML's end, with special emphasis of the Companies Act, 2017, Public Sector Companies (Corporate Governance) Rules, 2013, Independent Directors Regulations, 2018, State-Owned Enterprises (Governance and Operations) Act, 2023, Khyber Pakhtunkhwa Mines and Minerals Act, 2017 (amended-2019), Khyber Pakhtunkhwa Public Private Partnership Act, 2020, Mines Safety Act, 2019, Excise Duty on Minerals (Labor Welfare) Act, 1967. We have also reviewed and analyzed Khyber Pakhtunkhwa Mines and Mineral Bill- 2025, currently under consideration in the Provincial Assembly. As of the date of this inception report, the Khyber Pakhtunkhwa Mines and Minerals Bill, 2025, remains under consideration in the Provincial Assembly of Khyber Pakhtunkhwa. Introduced on April 4, 2025, the bill aims to modernize the province's mining sector by establishing new regulatory bodies, including a Mineral Investment Facilitation Authority (MIFA), and enhancing licensing and enforcement mechanisms. Nonetheless, the bill has encountered significant opposition from civil society groups. As reliably ascertained, the provincial government scheduled a briefing session on April 14, 2025, to address lawmakers' concerns and build consensus. Despite these efforts, the bill has not yet been passed. According to our analysis, while the Bill strengthen regulatory mechanisms, it does not explicitly authorize the establishment or operational mandate of a state-owned mineral development company such as KP-MDMCL. This omission presents a potential legal gap, as KP-MDMCL's role, licensing procedure, and relationship with regulatory bodies are not currently defined under the proposed framework.





#### 4. Public-Sector Entities in similar regime/model in other provinces of Pakistan.

A comparative analysis of the companies established under similar regimes in other provinces and regions also remained a subject matter of the desk review. The analysis made revealed critical insights into the enabling factors and structural reforms necessary for the successful operationalization of KP-MDMCL. Entities such as the Punjab Mineral Company (PMC), Sindh Lakhra Coal Mining Company (SLCMC), and Baluchistan Mineral Exploration Company (BMEC), or such other as described herein this document, offer valuable lessons in terms of governance frameworks, legal empowerment, investor facilitation models, and public-private partnership mechanisms. These companies have benefited from well-defined mandates, political ownership, independent boards, streamlined regulatory linkages, and targeted resource mobilization strategies. In contrast, organizational inefficiencies, overlapping functions with line departments, and unclear strategic direction have hampered performance where institutional clarity and financial autonomy were lacking. This comparative exercise underscores the need for KP-MDMCL to adopt a **“fit-for-purpose”** governance-model, ensure operational and financial independence, and establish integrated coordination with sectoral regulators. Drawing on best practices from these comparable models can significantly enhance KP-MDMCL’s institutional design, strategic positioning, and long-term sustainability within the framework of the KP Mineral Development Policy and Strategic Action Plan – 2022. To supplement our findings, we give hereunder some of the companies operating under similar regimes/ models in other provinces of Pakistan and there is a dire need to evaluate their operational challenges as lesson for KP-MDMCL.



**COMPANIES UNDER SIMILAR REGIMES – COMPARATIVE ANALYSIS**

	<b>Punjab</b>		<b>Sindh</b>	<b>Baluchistan</b>	
<b>Feature</b>	Punjab Mineral Company (Pvt) Ltd <b>PMC</b>	Punjab Mineral Development Corporation <b>PUNJMIN</b>	Sindh Lakhra Coal Mining Company <b>SLCMC</b>	Baluchistan Mineral Exploration Co Ltd <b>BMEC</b>	Baluchistan Mineral Resources Limited <b>BMRL</b>
<b>Legal Entity</b>	Private Limited	PMDC Act, 1975	Private Limited	Public Limited	Public Limited
<b>Established</b>	<b>2009</b>	<b>1975</b>	<b>2016</b>	<b>2020</b>	<b>2020</b>
<b>Ownership</b>	Government of Punjab	Government of Punjab	Government of Sindh	Government of Baluchistan	Government of Baluchistan
<b>Core Focus</b>	Exploration & evaluation of Punjab’s mineral resources	Mining and marketing of minerals like coal, salt, gypsum	Coal mining and supply (Lakhra Coalfield)	Geological surveys & exploration across multiple mineral sectors	Commercial mining projects, JV facilitation, value addition
<b>Key Minerals</b>	Iron ore, Copper, Bauxite, Silica, Limestone	Coal, Salt, Gypsum	Lignite coal	Copper, Lead, Zinc, Iron, Sulfur	Copper, Gold, Lead, Zinc, Barite, Chromite
<b>Major Projects</b>	Chiniot-Rajoa Iron-Copper Project, Kalabagh Iron	Supply of minerals to chemical, ceramics, and cement industries	Lakhra coal supply to power plants, new block exploration	Provincial exploration blocks, technical assessments	Strategic partner in Reko Diq revival, foreign JV mining projects
<b>Current Operations</b>	Feasibility studies, geological assessments, PPP deals	Active mining and supply of minerals to various industries	Underground coal mining, field medical facilities	Mineral exploration & mapping (no commercial production yet)	Active in MoUs and joint ventures for mine development and mineral exports
<b>Workforce Size</b>	51–200 employees	Not specified	~100+ personnel (on-ground and administrative)	Small technical staff (~50 employees)	Medium-size team with mining engineers, legal & policy experts
<b>Business Model</b>	Public-sector funding + Public–Private Partnerships	State-run operations with focus on mineral supply chain	State-run mining operations	Technical mapping to inform future investment	JV model with both local & international private sector
<b>Challenges</b>	Delays in licensing, bureaucratic hurdles	Modernization of equipment, expansion of operations	Environmental compliance, equipment modernization	Lack of infrastructure, difficult terrain	Security in mineral zones, policy clarity for private partners
<b>Social/ESG Impact</b>	Not actively publicized	Supplies essential minerals to key industries, contributing to economic development	Miner health insurance, site clinics	Job creation goal (early stage)	Aims to boost provincial revenue and local employment through responsible mining

Note: The above analysis didn’t include several other entities operating in Mineral Exploration like Baluchistan Mineral & Rocks (Pvt) Limited, formed in year 2024, and likewise companies incorporated in the private sector.

## 5. Institutional and Legal Challenges

The establishment of KP-MDMCL under the Companies Act, 2017, marks a progressive step toward strengthening Khyber Pakhtunkhwa's mineral development capabilities. However, its operational environment is challenged by legislative shortcomings and stakeholder apprehensions, particularly concerning the KP Mines and Minerals Bill, 2025. Unlike the more participatory 2017 Act (amended in 2019), the 2025 Bill is perceived as overly centralized, raising fears of sidelining private sector and community roles. Although KP-MDMCL's corporate structure allows it functional autonomy, its government ownership means it remains reliant on public support and strategic guidance, underscoring the need for robust legal backing. Additionally, the recognized existence of MIFA, with its broad and overlapping authority, creates institutional confusion and risks inefficiencies. A clear, harmonized legal framework is essential to delineate the roles of MIFA, the Directorate General Mines & Minerals, and KP-MDMCL to ensure the sector's successful reform and avoid operational gridlock. The initial desk review resulted in the following:

- Legislative Gaps – existing and proposed laws
- 2025 Bill – in positive perspective
- Proposal legislative support

### 1. Legislative Gaps

While the company has been incorporated under the relevant provisions of the Companies Act, 2017 and that too, as a Public Limited Company, allowing for autonomous commercial operations, there is a notable absence of enabling provisions with the KP Mines and Minerals Development Act, 2017 (amended -2019) and the proposed KP Mines and Minerals Bill- 2025 to clearly define the company's statutory mandate and institutional alignment within the broader mineral governance ecosystem. Few other aspects (including above) denoting the aforesaid legislative gaps are also indicated below:

- a. Absence of legislative mandate for KP-MDMCL
- b. Stakeholders concerns and reduced acceptability
- c. Functional overlap with MIFA

### 2. 2025 Bill – in positive perspective

The KP Mines and Minerals Bill, 2025, proposes comprehensive legal and institutional reforms to modernize the province's mineral governance framework. Key provisions include the establishment of a real-time digital Mining Cadastre System (Section 5) for greater transparency and efficiency; formation of the Mineral Investment Facilitation Authority (MIFA) and Special Mines Force (Section 19) to expedite investment and enforce compliance; and enhanced Environmental and Social Governance (Section 23), requiring EIAs, community engagement, and equitable benefit-sharing. The Bill also enables public-private partnerships through joint ventures involving state-owned enterprises like KP-MDMCL (Section 35). However, concerns arise over the functional overlap between MIFA and KP-MDMCL, potentially leading to institutional confusion. *It is recommended that the facilitation role envisioned for MIFA be integrated within KP-MDMCL to streamline mandates, avoid duplication, and strengthen the company's role as the province's lead entity for mineral sector development.*



## 6. Gist of Recommendations

Some of the key recommendations detailed in our Desk Review Report are strongly encouraged for consideration, keeping in view the broader interests of the mineral development sector in Khyber Pakhtunkhwa and Pakistan at large. If adopted in a phased and systematic manner, these recommendations have the potential to transform KP-MDMCL into a commercially viable and professionally governed entity, one that can unlock the province's mineral wealth and contribute meaningfully to sustainable economic growth. A brief summary of select recommendations is outlined below:

Strategic Pillar	Initiative	Purpose / Impact
Corporate Structure	Corporate Consolidation of SML	Streamline governance and enhance efficiency through mergers or restructuring.
Testing Infrastructure	Realignment of the Mineral Testing Laboratory	Align testing services with market demand and strategic priorities.
Quality Assurance	Accredited Commercial Laboratory	Ensure international standards, enabling export readiness and trust.
Investment Promotion	Development of Mineral Investment Zones (MIZs)	Attract FDI and facilitate sectoral clustering in mineral-rich areas.
Brand & Outreach	Institutional Branding and Investor Outreach	Build credibility, increase visibility, and attract global partners.
Project Development	Formation of a Project Preparation Cell (PPC)	Ensure high-quality, bankable project pipelines for investors.
Revenue Management	Restructuring Systems for Royalty Collection and Management	Improve transparency and revenue capture from mineral operations.
Data & Forecasting	Integration of Mineral Sector Projections	Enable strategic planning through reliable sector forecasts.
Knowledge Sharing	Develop a Centralized Knowledge Repository	Consolidate research, geodata, and reports for accessible insights.
Human Capital	Capacity Building and Technical Training	Enhance skills to meet future mineral sector demands.
Financing	Minerals Development Fund	Provide catalytic financing for exploration and infrastructure.
Legal Enablement	Legislative Support for KP-MDMCL	Strengthen KP-MDMCL's mandate through targeted legal reforms.
Strategic Positioning	Positioning KP-MDMCL at the Forefront of Mineral Sector Development in MIFA	Establish KP-MDMCL as a national leader in mineral governance.

## FINDINGS AGAINST KEY DELIVERABLES

It is worth noticing that we have already initiated working on various deliverables we are obligated to submit after the inception phase. As a matter of priority, a primary focus has been given on the development of a comprehensive Human Resource Management (HRM) framework, which is rightly recognized as a cornerstone for the effective establishment and operationalization of the KP Minerals Development and Management Company Limited (KP-MDMCL). At the heart of this effort lies the recognition that no institutional structure can achieve operational efficiency without capable human capital. These initial activities serve not only as a foundation for the final deliverables but also as a practical step toward ensuring that KP-MDMCL can commence operations in a phased, well-supported, and legally compliant manner. These roles are critical not only to meet compliance and governance needs but also to drive strategic growth, investor engagement, and project execution.

A gist of works in hand are as follows:



### 1. **Organogram of KP-MDMCL**

In support of this objective, an initial organogram for KP-MDMCL has been prepared, reflecting the proposed reporting hierarchies, departmental structures, and operational lines. S

### 2. **Devising and developing draft HR Manual**

A draft HRM manual is under development, which outlines core HR strategies, including recruitment, performance evaluation, compensation, training, and retention mechanisms. The framework ensures alignment with best practices and legal requirements, while also considering the unique demands of the mineral sector in Khyber Pakhtunkhwa.

### 3. **Developing a customized Business Plan**

In parallel, initial content has been developed for the business plan, including a preliminary articulation of the company's vision, mission, and strategic goals. These elements are informed by an assessment of the mineral potential of the region, institutional gaps, and the broader policy environment. Furthermore, early-stage identification of potential projects has commenced, laying the groundwork for a dynamic project pipeline to be further refined in subsequent phases of the assignment.

## KEY ASSUMPTIONS AND RISK MITIGATION

As part of inception phase, it is considered important to highlight the assumptions underlying intended working on the assignment, while focusing to bring timely delivery of the Roadmap for Operationalization of the KP-MDMCL. It may therefore, be noted that the successful establishment and operationalization of KP Minerals Development and Management Company Limited (KP-MDMCL) is predicated on the several underlying assumptions and external conditions. Identifying these assumptions early in the project lifecycle helps in outlining potential risks and in formulating proactive mitigation strategies to safeguard the consultancy's objectives and ensure smooth implementation.

### 1. External Dependencies

The project is influenced by several external variables beyond the immediate control of the consulting team of IECnet Pakistan and/or the Top-tiers of Minerals Development Department (MDD), GoKP. These include:

- Policy Continuity and Legislative Support: The success of KP-MDMCL relies heavily on continuity in mineral development policy, legislative backing for enabling reforms and timely enactment of key instruments such as the KP Mines and Minerals Development Bill – 2025, and/or any other legislative support through an independent enactment with efforts of the MDD.
- Stakeholder Cooperation: Effective collaboration and data-sharing from relevant public sector entities, such as the Directorate of Mines & Minerals, the Inspectorate of Mines, the Commissionerate of Mines and Minerals, GoKP, are vital. The studies already undergone on the geological studies, exploration reports, maps, feasibility assessments and other technical document currently held by the Directorate of Mines and Minerals KP or the MDD, GoKP.
- Investment Climate: An enabling economic environment and sustained interest from both domestic and foreign investors are essential to ensure the commercial viability of KP-MDMCL. The continuity of the government and its development-focused priorities, particularly in unlocking the economic potential of underutilized sectors, presents a positive signal for long-term investments. Notably, the mineral development sector has been identified as a strategic area for economic growth, with policy frameworks, regulatory facilitation, and institutional reforms increasingly aligned to attract and protect mining-related investments. If the current policy direction is maintained, Pakistan, especially Khyber Pakhtunkhwa, could witness a surge in exploration activities, technology transfer, and public-private partnerships, strengthening investor confidence and positioning the region as a mineral development hub in South Asia.
- Law and Order situation: Pakistan has improved its security environment, though localized challenges persist. Continued law enforcement efforts are vital to protect investments, particularly in mineral-rich areas, where stability is key to sustaining investor confidence and long-term development.
- SECP Facilitation: Timely support and approvals from the Securities and Exchange Commission of Pakistan (SECP), including for the issuance of the Certificate of Commencement of Business, remain critical milestones.



## 2. Institutional and Political Risks

The timely commencement of business remains a critical milestone for KP-MDMCL. However, beyond external dependencies, internal institutional and political risks present significant challenges. The dual role of the Minerals Development Department (MDD) as both regulator and operator creates a conflict of interest that may restrict KP-MDMCL's operational autonomy. Additionally, delays in recruiting qualified personnel, resistance to new hiring structures, and a shortage of skilled human resources could hinder early-stage operations. Political shifts, leadership changes, and bureaucratic inertia further risk slowing decision-making and project momentum.

## 3. Institutional and Political Risks

To keep the company's operationalization on track despite regulatory, political and institutional complexities, several mitigation strategies are embedded in the implementation framework. These include a structured stakeholder engagement plan to align expectations and resolve issues, an accelerated HR strategy to fast-track recruitment and close coordination with legislative bodies to support legal progress. Adaptive planning through flexible timelines and scenario-based approaches, alongside institutional capacity building and change management, are also key components.

## PROPOSED POTENTIAL PROJECTS

This section briefly highlights proposed potential projects to be undertaken by KP-MDMCL. It is worth noticing that the Khyber Pakhtunkhwa province is endowed with significant mineral wealth, yet much of its potential remains underexplored and underutilized. Further, the lack of advanced geological assessments, outdated mining techniques and uncoordinated efforts have largely resulted in suboptimal exploitation of the valuable and non-renewable resources. The establishment of KP-MDMCL provides a timely opportunity to institutionalize and spearhead systematic mineral development initiatives. By identifying high-potential zones, modernizing mining practices, and supporting artisanal and small-scale miners with knowledge, skills, and technology, KP-MDMCL can help unlock the true economic value of the province's mineral resources in an environmentally sustainable and commercially viable manner. The initial projects that can be executed with optimum utilization are as follows:

### Inception Phase Investment Proposals For KP-MDMCL

Following incorporation and obtaining the certificate for commencement of business from the Securities and Exchange Commission of Pakistan (SECP), KP Mineral Development & Mining Company Limited (KP-MDMCL) intends to prioritize scalable, sustainable, and strategically aligned initiatives that can deliver economic value in the short to medium term. Based on available resource data, sectoral dynamics, and institutional capacity at inception, the following projects are proposed for inclusion in the inception phase roadmap:

#### 1. Establishment of Gypsum Mineral Processing Facility at Kohat/Karak

Gypsum is among Pakistan's most abundantly available non-metallic minerals, with approximately 5.5 billion tons of reserves in Khyber Pakhtunkhwa alone, accounting for over 92% of national reserves (source: Geological Survey of Pakistan, 2023). The Kohat Division, particularly the districts of Kohat and Karak, holds **89%** of Khyber Pakhtunkhwa's gypsum deposits, amounting to **4.9 billion tons** (estimated). Annual production is estimated at **4.2 million tons**, primarily from **70 mines** operating on a small to medium scale. Currently, mineral processing activity is limited to basic crushing and powdering, with minimal value addition. The absence of organized large-scale processing results in underutilization of resource potential and loss of economic value to informal middlemen or out-of-province processors. KP-MDMCL can initiate a Gypsum Processing and Value Addition Zone (GPVZ) at a suitable site in Kohat or Karak. This will serve as a mineral-industrial park for gypsum-based industries such as:

- Plaster of Paris (POP) production
- Gypsum board and panel manufacturing
- Agricultural gypsum processing

The proposed financial model is based on a hybrid Public-Private Partnership (PPP) structure, wherein KP-MDMCL will provide land and base infrastructure, while the private sector will invest in plant and machinery under a revenue-sharing or long-term lease arrangement. Environmental approvals, utility connections, and local facilitation will be coordinated with relevant provincial departments to ensure smooth implementation.



The expected impact includes the creation of approximately 250 to 300 direct jobs in Phase I, an estimated annual revenue generation of PKR 750 million, and a significant boost to local economic activity through increased fiscal contributions in the form of royalties and sales tax.

## 2. Pilot J.V Framework – Copper Leaseholders In Waziristan

The Waziristan region is geologically endowed with Volcanogenic Massive Sulphide (VMS) copper deposits. Recent assessments suggest the area holds approximately 120 million tons of copper ore with an average grade of **0.4%**. Several small-scale prospecting licenses in Dawagarh, Muhammad Khel, and Datta Khel represent 5–6 million tons of exploitable deposits at similar grades. The current challenge is that small leaseholders lack capital, technology, and processing capability to extract and commercialize these low-grade, high-tonnage ores. While large-scale beneficiation plants are capital-intensive, modular processing units can offer a near-term solution.

The proposed action involves initiating a Copper Joint Venture (JV) Framework, under which KP-MDMCL will enter into revenue-sharing agreements with small-scale leaseholders. As part of this initiative, KP-MDMCL will invest in modular copper beneficiation plants with a processing capacity of 300 to 500 tons per day. A pilot project is proposed at Muhammad Khel, building on insights gained from the successful 1,500 tons/day copper beneficiation plant operated by FWO. The financial model may be structured as an equity joint venture or a royalty buyout arrangement, where KP-MDMCL contributes technical expertise and financial resources, while leaseholders provide mining rights and access to sites. Offtake agreements will be established to ensure operational sustainability. The expected impact includes initial production of 15,000 to 20,000 tons of beneficiated copper ore annually, generation of local employment in underdeveloped and previously conflict-affected regions, and progressive scaling to additional blocks through private and institutional co-investment.

## 3. Strategic Exploration MOU – Chitral Gemstone & Rare Metal Pegmatite Belt

Recent geochemical surveys and satellite imagery suggest that western Chitral District, particularly in the vicinity of Kafirstan and Garam Chashma plutons, may host significant pegmatite bodies containing lithium, tantalum, niobium, beryllium, and other rare earth elements. The proximity to the Nuristan Pegmatite Belt of Afghanistan, where such occurrences are confirmed, increases confidence in the mineralogical continuity across borders. Stream sediment anomalies and informal gemstone extractions (e.g., aquamarine, tourmaline, garnet) already indicate high mineral potential. The proposed action includes KP-MDMCL entering into Memorandums of Understanding (MoUs) with both national and international exploration firms, as well as academic institutions. This will be followed by the launch of a systematic geological mapping and sampling campaign, conducted in collaboration with the Geological Survey of Pakistan (GSP) and local universities. The financial model for this initiative will follow an Exploration Alliance Model, which offers a low-cost, low-risk approach to acquiring geological data while allowing KP-MDMCL to retain the rights for future mineral development. The expected impact includes the identification of new mineral prospects, particularly for strategic and battery minerals, and the potential to attract foreign direct investment in rare metals.



### Conclusion & Implementation Roadmap

These proposals represent a blend of low-hanging fruit and strategic groundwork that aligns with KP-MDMCL’s objectives of enabling mineral-led development, economic inclusion, and long-term sustainability. The projects are sequenced as:

Sr #	Project	Timeline	Model	Priority
1	Gypsum Processing Facility	Year 1–2	Hybrid PPP	High
2	Copper JV with Leaseholders	Year 1–3	Equity JV	Medium
3	Chitral Pegmatite Exploration	Year 1	MoU-based	Strategic

Project	Revenue	COGS	Operating Expenses	EBITDA	EBIT	EBT	Tax	Net Income
Gypsum Processing Facility (Kohat/Karak)	PKR 750M	PKR 300M	PKR 150M	PKR 300M	PKR 250M	PKR 230M	PKR 69M	<b>PKR 161M</b>
Copper Beneficiation Plant (Waziristan)	PKR 850M	PKR 400M	PKR 180M	PKR 270M	PKR 210M	PKR 180M	PKR 54M	<b>PKR 126M</b>
Gemstone & Rare Metals Exploration (Chitral)	PKR 150M	PKR 60M	PKR 50M	PKR 40M	PKR 30M	PKR 25M	PKR 6.25M	<b>PKR 18.75M</b>

*(Note: The basic financial assumptions used for projecting income statements and net profits for the three proposed projects under KP-MDMCL, are based on publicly available data, industrial benchmarks and region-specific insights. Hence, the figures are illustrative and required to be revalidated while preparing detailed feasibility studies)*



## TEAM COMPOSITION

### Core Team

Mr. Muhammad Ahmad Shahid, FCA	Team Lead
Mr. Manzoor Ahmed Savul, FCA	Chartered Accountant – Financial Model Expert
Mr. Malik Mirza, FCA	Chartered Accountant – Capacity Development Specialist & Financial Model Expert
Mr. Ashraf Khan	Institutional Development Expert & Chief Co-Ordinator
Mr. Javed Iqbal Khattak	Corporate Governance Expert
Barrister Syed Saad Ali Shah	PPP Model / Investment Expert
Dr. Kashif Mushtaq	ICT Expert
Mr. Shumail Ahmad Butt	Advocate Supreme Court
Mr. Safer Qaiser Malik	Advocate High Court
Mr. Zahid Aman	Advocate Supreme Court
Ms. Laiba Khan	Advocate
Dr Khalid Farooq Akhtar	Environmentalism
Mr. Altaf Hussain	Environmentalism
Mr. Muhammad Mussadiq	Geologist
Mr. Umar Ammar Mehmood	Geologist
Mr. Muhammad Ahsan Shahid, FCCA	Business Planning Expert
Mr. Kamal Mehmood	Financial Analyst & Reporting Expert
Ms. Bushra Yaseen	CSR Specialist

### Steering Committee (Think-Tank)

<b>Mr. Zia ur Rehman</b>	Ex-Sectary Finance & Ex-Secretary Mines & Mineral Deptt.
<b>Mr. Muhammad Ahmad Shahid</b>	Chartered Accountant
<b>Mr. Javed Iqbal Khattak</b>	Corporate Governance Expert
<b>Dr. Syed Said Badshah Bukhari</b>	Ex-Secretary, Finance Departmen

## TECHNICAL TASK & REPORTING

Task	Duration (Work Days)	Number of weeks														
		1	2	3	4	5	6	7	8	9	10	11	12			
Project Initiation Kick-off meeting	1	█														
Initial desk review	7	█	█													
Meetings with DGMM, IM & CM	5		█													
Desk Review Report	5			█												
Inception Reporting	17				█	█										
Business Plan Development	12					█										
HR Plan & Governance Structure	7							█								
Legal & Regulatory Framework	5								█							
Financial Model & Investment Strategy	10									█	█					
Sustainability & Environmental Plan	7												█			
Final Roadmap Report	14														█	█
<b>Total work days</b>	<b>90</b>															

**NOTE:**

The total duration of 90 days refers strictly to working days, calculated based on 5-days work week, These excludes all public holidays, Eid and other gazette holidays, and/or time consumed for arranging official presentation meetings or on coordination efforts. The schedule has been designed accordingly to reflect realistic and practice timelines for all deliverables apprehended to conclude by or before August 31, 2025.



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## TABLE OF ABBREVIATIONS

Abbreviation	Full Form
ADS	Administrative District Short-Codes
BMEC	Baluchistan Mineral Exploration Company Limited
BMRL	Baluchistan Mineral Resources Limited
CMSI	Consolidated Mining Standard Initiative
EIAs	Environmental Impact Assessments
ESG	Environmental, Social, and Governance
GoKP	Government of Khyber Pakhtunkhwa
GRI	Global Reporting Initiative
GSP	Geological Survey of Pakistan
HR	Human Resources
HRM	Human Resource Management
IFC	International Finance Corporation
JV	Joint Venture
KP-MDMCL	Khyber Pakhtunkhwa Minerals Development and Management Company Ltd
MDD	Minerals Development Department
MDF	Minerals Development Fund
MIFA	Mineral Investment Facilitation Authority
MSP	Minerals Security Partnership
OECD	Organization for Economic Co-operation and Development
PMC	Punjab Mineral Company (Pvt) Limited
PMDC	Pakistan Mineral Development Corporation
PPP	Public-Private Partnership
PUNJMIN	Punjab Mineral Development Corporation
RFZ	Reshun Fault Zone
SDA	Sarhad Development Authority
SDGs	Sustainable Development Goals
SECP	Securities and Exchange Commission of Pakistan
SLCMC	Sindh Lakhra Coal Mining Company Limited
SOEs	State-Owned Enterprises
SPV	Special Purpose Vehicle
UNDP	United Nations Development Program
USAID	United States Agency for International Development



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