

To:
The Director General
Pakistan Sports Board
Islamabad

Date: September 2, 2026

Subject: Grievance Regarding Eligibility & Qualification Criteria for Pre-Qualification of Air Travel Agencies / Services under Framework Agreement

Dear Sir,

We respectfully submit this grievance regarding the Eligibility & Qualification Criteria prescribed by the Pakistan Sports Board for the Pre-Qualification of Air Travel Agencies / Services under Framework Agreement.

Upon reviewing the pre-qualification requirements, we are concerned that the prescribed eligibility criteria appear to restrict participation based on the type or legal structure of the business entity. As a result, established sole proprietor travel agencies may be excluded from participating, despite being legally registered, tax compliant, IATA accredited, financially capable and experienced in providing air travel services.

We believe such a restriction requires reconsideration in light of the principles of fair competition, transparency, equal opportunity and value for money embodied in the Public Procurement Rules, 2004.

1. Unnecessary Restriction on Sole Proprietor Travel Agencies

There are numerous reputable travel agencies in Pakistan operating as sole proprietorships that have been providing airline reservation, ticketing, corporate travel, group travel and other related services for many years.

The fact that a business operates as a sole proprietorship does not, by itself, determine its financial strength, technical capability, experience, service quality or ability to perform a government contract.

A sole proprietor travel agency may possess substantial industry experience, IATA accreditation, established airline relationships, qualified staff, financial capacity and a strong market reputation.

Therefore, excluding such agencies merely because of their legal/business structure may unnecessarily restrict competition and prevent experienced service providers from participating in a public procurement process.

2. PPRA Rule 15 and Ability to Perform the Required Services

We respectfully draw attention to Rule 15 of the Public Procurement Rules, 2004, concerning pre-qualification of suppliers and contractors.

The purpose of pre-qualification is to determine whether an interested party has the ability to satisfactorily perform the required work. Relevant considerations include experience and past performance, personnel and operational capability, financial position and managerial capability.

In the case of air travel services, these are the factors that directly demonstrate whether an agency is capable of performing the required services.

Accordingly, we believe that qualification should primarily be based upon relevant experience, past performance, financial capacity, technical capability, IATA accreditation, qualified personnel and operational resources, rather than the legal form under which the travel agency operates.

3. Concern Under PPRA Rule 32

We also draw attention to Rule 32 of the Public Procurement Rules, 2004, relating to discriminatory and difficult conditions.

The Rules provide that a procuring agency should not introduce conditions that discriminate between bidders or create conditions that are unnecessarily difficult to meet with reference to the ordinary practices of the relevant trade or service.

If a sole proprietor travel agency is legally recognized, properly registered, tax compliant, IATA accredited and capable of providing the required services, a condition that excludes such an agency solely because of its business structure may have the effect of unnecessarily limiting competition.

We respectfully request that the Pakistan Sports Board consider whether such a restriction is genuinely necessary for the performance of the Framework Agreement or whether the same objective can be achieved through objective technical, financial and experience-based qualification requirements.

4. Legal Structure Should Not Replace Actual Capability

For an Air Travel Services Framework Agreement, the primary concern should reasonably be whether the selected agency can:

- Provide airline reservation and ticketing services efficiently;
- Maintain appropriate ticketing and reservation facilities;
- Provide competitive fares and service;
- Handle corporate and group travel;
- Manage urgent and emergency travel requirements;
- Provide qualified and experienced personnel;
- Maintain financial capacity to support the required operations;
- Provide 24/7 travel assistance where required; and

- Demonstrate satisfactory past performance.

These capabilities can be independently verified through documentary evidence, references, financial documents, IATA accreditation and previous contracts.

The business structure alone does not establish any of these capabilities.

5. Fair Competition and Value for Money

As a public sector organization, the Pakistan Sports Board has a responsibility to ensure that its procurement process promotes fair, transparent and competitive participation.

Rule 4 of the Public Procurement Rules, 2004 emphasizes the principles of fairness, transparency, efficiency, economy and value for money.

Similarly, Rule 20 recognizes open competitive bidding as the principal method of procurement.

Unnecessarily limiting the number of eligible travel agencies may reduce competition and potentially deprive the Pakistan Sports Board of the opportunity to obtain better commercial terms and services from other experienced market participants.

A well-established sole proprietor travel agency with extensive industry experience should not be considered less capable merely because another bidder has been incorporated as a company.

6. Disparity Between Business Form and Industry Practice

The travel industry includes businesses operating under different legally recognized structures, including sole proprietorships, partnerships and companies.

If the objective of the pre-qualification process is to identify financially sound, experienced and technically capable travel service providers, then the qualification criteria should reasonably apply the same substantive standards to all eligible forms of business.

For example, an agency with 10 or 15 years of relevant experience, IATA accreditation, strong financial standing and an established portfolio of corporate and institutional clients should not be excluded merely because its business is registered as a sole proprietorship.

Such a restriction may result in the exclusion of experienced industry participants without necessarily improving the quality, reliability or security of the procurement.

7. Request for Reconsideration

In view of the above, we respectfully request the Pakistan Sports Board to review the Eligibility & Qualification Criteria and reconsider any condition that excludes sole proprietor travel agencies solely on the basis of their legal/business structure.

We are not seeking any relaxation in the required standards. We fully support the Pakistan Sports Board's requirement that only competent, financially sound and experienced agencies should be pre-qualified.

Our grievance is that capability should be demonstrated through objective qualification requirements rather than presumed from the legal structure of the business.

We therefore request that sole proprietor travel agencies be permitted to participate where they can demonstrate the required:

- Relevant experience;
- IATA accreditation or recognized ticketing authority;
- Financial capacity;
- Tax and regulatory compliance;
- Technical and operational capability;
- Qualified personnel;
- Proven past performance; and
- Ability to provide the required air travel services.

We respectfully request the Pakistan Sports Board to review the relevant conditions in light of Rules 4, 15, 16, 20 and 32 of the Public Procurement Rules, 2004, and ensure that the pre-qualification process does not unnecessarily restrict competition or exclude otherwise qualified service providers.

We further request that, where necessary, the Eligibility & Qualification Criteria be appropriately amended or clarified before the closing date so that all genuinely qualified travel agencies have an equal opportunity to participate.

This grievance is submitted in good faith with the objective of ensuring a fair, transparent, competitive and legally compliant procurement process, while enabling the Pakistan Sports Board to select the most capable and commercially suitable travel service provider.

Thank you for your consideration.

Yours faithfully,

Saeed Akhtar

CEO

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