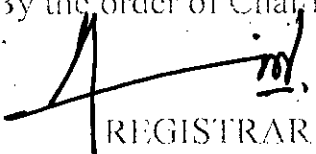


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

2286/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/11/2023	<p>The appeal of Mr. Muhammad Abdus Samad resubmitted today by Mr. Bashir Khan Wazir Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Muhammad Abdus Samad Divisional Wildlife officer Kohat received today i.e on 20.10.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Annexures of the appeal are unattested.
- 3- Check list is not attached with the appeal.
- 4- Memorandum of appeal is not signed by the appellant.
- 5- Affidavit is not attested by the Oath Commissioner.
- 6- Index of the appeal is incomplete.
- 7- Copy of acting charge base promotion in respect of appellant mentioned in para-5 of the appeal is not attached with the appeal be placed on it.
- 8- Copy of impugned seniority list of 2022 and departmental appeal against it mentioned in para-6 of the memo of appeal are not attached with the appeal be placed on it.
- 9- Annexures A, B, C and F of the appeal are illegible which may be replaced by legible/better one.
- 10- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3443 /S.T.

Dt. 23-10 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Bashir Khan Wazir Adv.
High Court Peshawar .

Sir.

objection no 3 removed check list is available
objection no 7 removed as regular promotion
has been issued. no need of acting charge
promotion

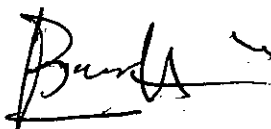
objection no 8 is concerned no seniority list
in the year 2022 has been issued or
served to the appellant, so no need
of the same

objection no 9 removed.

pls be fined before the bench

2/11/2023

Regards



**BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

Service Appeal No 2286 /2023

Muhammad Abd us Samad.....Appellant

V E R S U S

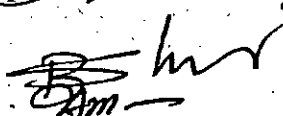
Govt of KPK & others..... Respondents

I N D E X

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Service Appeal	-	1-6
2.	Affidavit	-	7-
3.	Copy of the appointment order	A	8-9
4.	Copy of the Appointment Order dated 03.10.2014	B	10-11
5.	Copy of the Service Rules	C	12-14
6.	Copy of the acting Promotion to BPS-18	D	15
7.	Copy of the impugned Seniority, Departmental Appeal and order dated 20.09.2023	E	16-24
8.	Wakalat Nama		25

Through:


Appellant


(BASHIR KHAN WAZIR)
Advocate, High Court
Peshawar

1

**BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

Service Appeal No 2786 /2023

Office of the Registrar
Peshawar

Case No. 8449

Dated 20-10-23

Muhammad Abd us Samad S/o Abdul Ghafar Khan, Divisional
Wildlife Officer, Kohat Wildlife Division, KDA, Kohat.

.....Appellant

VERSUS

1. Govt of Khyber Pakhtunkhwa, through Chief Secretary, Khyber Pakhtunkhwa Peshawar.
2. Secretary Govt of Khyber Pakhtunkhwa, Climate Change, Forestry, Environment and Wildlife Department Peshawar.
3. Chief Conservator Forest Central Southern Region-I Khyber Pakhtunkhwa Peshawar.
4. Conservator Wildlife, Southern Circle Bannu.

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, FOR
SETTING ASIDE THE IMPUGNED SENIORITY LIST
INITIALLY OF BPS-17 AND NOW THE TENTATIVE
SENIORITY LIST OF 2023 IN BPS-18 ISSUED, WHEREBY
THE SENIORITY OF THE APPELLANT HAS NOT BEEN
GIVEN WITH EFFECT FROM 13.07.2018 AND THE
BENEFITS OF SERVICE IN BPS-16 IN THE SAME
DEPARTMENT HAS NOT BEEN CONSIDERED FOR THE
PURPOSE OF SENIORITY AND ONWARD REGULAR
PROMOTION TO BPS-18 AND AFTER GOT THE
KNOWLEDGE OF THE IMPUGNED SENIORITY LIST THE
APPELLANT FILED DEPARTMENTAL APPEAL FOR
CONSIDERATION THE REGULAR SERVICE IN BPS-16 AS
RANGE OFFICER WILDLIFE. THE APPELLANT WAS
ENTITLED FOR REGULAR PROMOTION AS DEPUTY
CONSERVATOR BPS-18 FROM THE DATE OF
13.07.2018, WHEREBY THE ACTING CHARGE
PROMOTION WAS GIVEN TO THE APPELLANT AND
ACCORDINGLY THE IMPUGNED SENIORITY LIST HAS
BEEN IN QUESTIONED BY THE APPELLANT THROUGH
DEPARTMENTAL APPEAL WHICH WAS REGRETTEED ON
DATED 20.09.2023 AND THE SAME HAS BEEN
COMMUNICATED TO THE APPELLANT ON DATED
25.09.2023.**

Filed to day
30/10/23
Registrar

2

Prayer in Appeal:

On acceptance of the instant Appeal, the Appellant was entitled for regular promotion w.e.f 13.07.2018, rather the promotion was issued on acting charge basis, as per the promotion policy, the competent authority was required to be extended six and half years of the post of Range Officer Wildlife BPS-16 on regular basis to the appellant and according to which the appellant was entitled w.e.f 13.07.2018 as Regular Promotion, but the same benefit was not given to the appellant and impugned Seniority list was issued on the basis of wrong analogy, which is illegal and liable to be set aside, consequently the respondents may kindly be directed to consider the service of Range Officer Wildlife BPS-16 towards the regular promotion and accordingly the Seniority List may be prepared Afresh and counted the previous service of the appellant for promotion.

Respectfully Sheweth:-

The Appellant humbly submits as under:-

1. That the Appellant is peaceful and law abiding citizen of Pakistan and is entitled for all the rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.
2. That the appellant having meritorious qualification to his strength and in pursuance of the advertisement floated by the KP Public Service Commission, the appellant was appointed as Range Officer Wildlife vide Office Order No. 43 dated 18.11.2008. **(Copy of the appointment order is attached as annexure A)**
3. That the appellant was appointed on regular post through Public Service Commission and assume the charge of the above mentioned post and since then he was performing his duty with full devotion, zeal and zest, meanwhile in the year 2014 the KP Public Service Commission advertised various positions of Sub Divisional Forest Officer Wildlife, in pursuance of the said advertisement, the appellant applied for the post of Sub Divisional Forest Officer Wildlife BPS-17 through proper channel as the appellant was performing his duty in the same department on regular basis in BPS-16, therefore the Appellant after gone through all the requisite criteria and finally he was declared as successful candidate by the KP Public Service Commission and accordingly recommendations of appointment in BPS-17 as Sub Divisional Wildlife Officer has been forwarded to the

3

respondents and finally the appointment order was issued on dated 03.10.2014. **(Copy of the Appointment Order dated 03.10.2014 is attached as annexure B)**

4. That the respondents having their own service rules issued vide notification dated 08.10.2007, according to which the promotion to the post of Deputy Conservator Wildlife / Divisional Wildlife Officer BPS-18 **"is required to be fill up by promotion on the basis of Seniority cum fitness, from amongst holders of posts of Sub Divisional Wildlife Officer BPS-17 with five years' service as such, who have successfully completed such training or passed such departmental examination as prescribed by the Government for this purpose"**. Similarly as per the ESTA Code and promotion policy the same criteria has been provided for the promotion to BPS-18. **(Copy of the Service Rules is attached as annexure C)**
5. That the appellant regular promotion was matured in the year 2018, by counting his previous regular service in BPS-16 in the same department, as the post of Divisional Wildlife Officer was lying vacant and he was eligible and entitled for regular promotion as per his length of service, however the respondents, while ignored the promotion policy issued promotion to the upper post in BPS-18 as on acting charge basis and did not consider the previous service of the appellant rendered in BPS-16 in the same department. **(Copy of the acting Promotion to BPS-18 is attached as annexure D)**
6. That the appellant submitted objections over the acts of the respondents and requested for consideration the regular services in BPS-16 as Rang Officer Wildlife with all mutates mutandi, the respondents given assurance for correction of the Seniority list and the consideration of previous service in BPS-16 towards the Seniority and promotion, however in the year 2022 when the seniority list was circulated, the service of the appellant was not considered and thereafter the appellant submitted a Departmental Appeal with all observations, but the same was also regretted on dated 20.09.2023 which was communicated to the appellant on 25.09.2023. **(Copy of the impugned Seniority, Departmental Appeal and order dated 20.09.2023 are attached as annexure E)**
7. That feeling aggrieved from the act of Respondents, the Appellant having no other adequate and efficacious remedy, approaches this Honourable Tribunal on the following grounds inter-alia:-

4

GROUNDS:-

- A) That the Appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- B) That according to the Promotion Policy, it has been provided in para 1 (Length of Service) (b) "Service in the Lower Pay Scale for Promotion to BPS-18 shall be counted as follows;
- (i) Half of the service in BS-16 and one fourth in basic scales lower than 16, if any shall be counted as service in basic scale 17".

The appellant has rendered his previous service in the same department on regular basis in BPS-16 and he was required to have been treated under the said policy, but the respondents violated the same policy and initially the appellant was promoted on dated 13.07.2018 on acting charge basis and thereafter, regularized the same promotion in the year 2020, which is not sustainable in the eyes of law.

- C) That the respondents were required to consider the services of the appellant as per the prevailing policy guidelines and according to which the length of service towards the regular promotion in BPS-18 was matured in the year 2018 and he was entitled to be given the benefits of the previous service, however the respondents ignored the factum of the same and deprived the appellant from his legitimate expectations.
- D) That the acts of the Respondents of not following the same criteria which has been safeguarded by the law and rules, while in the instant case the respondents have not yet considered the appeal of the Appellant, which is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.
- E) That it is worth to mentioned here that the impugned seniority list has been issued on malafide intention and with due diligence by the respondents, as the higher scale positions were lying vacant at the time of when the appellant was promoted to the post of Sub Divisional Officer BPS-18 on acting charge basis and thereafter issued the impugned seniority list, by mentioning the regular service of

5

the appellant w.e.f 2014 and violated the promotion policy, by not considered the previous service of the appellant.

- F) That the fundamental rights of the Appellant has blatantly violated by the Respondents and the Appellant has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- G) That the Appellant is not treated in accordance with law, rules and Regulations.
- H) That the Appellant is appointed according to rules and on adopted procedure by the respondents and after his appointment he has never ever given an opportunity of any complaint to the respondents and performed his duties with full devotions, the Appellant being eligible for Promotion being most Senior employee of the Respondents Department.
- I) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

PRAYER:-

It is, therefore, most humbly prayed that, On acceptance of the instant Appeal, the Appellant was entitled for regular promotion w.e.f 13.07.2018, rather the promotion was issued on acting charge basis, as per the promotion policy, the competent authority was required to be extended six and half years of the post of Range Officer Wildlife BPS-16 on regular basis to the appellant and according to which the appellant was entitled w.e.f 13.07.2018 as Regular Promotion, but the same benefit was not given to the appellant and impugned Seniority list was issued on the basis of wrong analogy, which is illegal and liable to be set aside, consequently the respondents may kindly be directed to consider the service of Range Officer Wildlife BPS-16 towards the regular promotion with all mutates mutandi and benefits and accordingly the

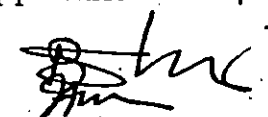
6

Seniority List may be prepared Afresh and counted the previous service of the appellant for promotion.

Any other relief, not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

Through:


Appellant


(BASHIR KHAN WAZIR)
Advocate, High Court
Peshawar

CERTIFICATE:

It is certified that no such like Appeal has earlier been filed before this Hon'ble Tribunal.

DEPONENT

7

**BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

Service Appeal No _____/2023

**Muhammad Abd us Samad.....Appellant
VERSUS
Govt of KPK & others..... Respondents**

AFFIDAVIT

I, Muhammad Abd us Samad S/o Abdul Ghafar Khan, Divisional Wildlife Officer, Kohat Wildlife Division, KDA, Kohat, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

Telephone 9213361



Confidential

NWFP Public Service Commission
2 Fortle Road Peshawar Cantt. 45140
NO. SW-V _____ Date: 6/11/19.

To:

The Secretary to Govt. of NWFP
Environment Department Peshawar

Environment Deptt.
Government of NWFP.
DO. No. 4827
D. 06/11/19

p-226/e

Subject:
Dear Sir,

RECTT: OF SIX RANGE OFFICER WILDLIFE (BPS-16)

I directed to refer to your letter No. SO(ESTT)ENV/11-6/2k4/4083 dated 2-11-2007, on the subject noted above and to state that the Commission recommends the following candidates to the Government for appointment.

1st Block.

Vacancy Rotation	Allocation	Merit Order	Name with Father's Name	Reserve/Zone	Adit	Page No
8 th vacancy	Zone-1	04	Muhammad Abdur Samad S/O Abdul Chaffar	FR Bannu/1	Own Quota	40
9 th vacancy	Merit	1	Muhammad Anjad S/O Abdul Qudous	Mansbrn/5	Merit Quota	44
10 th vacancy	Zone-2	06	Salah Ud Din 'Ayubi' S/O Jamal Ud Din	Peshawar/2	Own Quota	54
11 th vacancy	Zone-3	2	Ejaz Ur Rehman S/O Saif Ur Rehman	ICohistan/3	Own Quota	26
12 th vacancy	Zone-4	17	Haseena Anbarin D/O Safdar Ali Khan	Udman/4	Own Quota	57
13 th vacancy	Merit	3	Naveed Ul Haq S/O Noor Ul Haq	Dir Lower/3	Merit Quota	30

2- Recommendation in favour of the recommenders is provisional subject to passing their prescribed medical test.

3- Original applications (with enclosures) of the recommenders are sent herewith for your record. Please acknowledge receipt.

Handwritten notes: 1760, 17-08, 6/11/19, etc.

Yours faithfully,

(SYED RAZA DIN)
Deputy Secretary-I

OFFICE ORDER NO. 43 DATED PESHAWAR THE 18-11-2008, ISSUED BY
DR. MUHAMMAD MUMTAZ MALIK, CHIEF CONSERVATOR WILDLIFE, N.W.F.P. PROVINCE, PESHAWAR.

Annex-11

9

On recommendations of NWFP Public Service Commission as conveyed vide Section Officer (Estt.) Government of N.W.F.P., Environment Department letter No. SO (Estt.) ENVT/II-6/2K5/3696 dated 12.11.2008 and in pursuance of the provisions contained in Sub Section (2) of Section 19 of the N.W.F.P. Civil Servants Act, 1973 (N.W.F.P. Act No. XVIII of 1973) as amended by the N.W.F.P. Civil Servants (Amendment) Act, 2005 (N.W.F.P. Act No. IX of 2005), the following persons are hereby appointed as Range Officers Wildlife in DPS-10 (Rs. 5550-470-20150) in the NWFP Wildlife Department subject to the terms and conditions mentioned hereunder:-

1. Mr. Muhammad Arjad S/O Mr. Abdul Qados.
2. Mr. Ejaz-Ur-Rehman S/O Mr. Saif-Ur-Rehman.
3. Mr. Navood-Ul-Haq S/O Mr. Noor-Ul-Haq.
4. Mr. Muhammad Abdus Samad S/O Mr. Abdul Ghaffar.
5. Mr. Salah-Ud-Din Ayubi S/O Mr. Jamal-Ud-Din.
6. Miss. Hasoona Anbarin D/O Mr. Saldar Ali Khan.

TERMS AND CONDITIONS

- a) They will, for all intents and purposes, be Civil servants except for the purpose of pension or gratuity. In lieu of pension and gratuity, they will be entitled to receive such amount contributed by them towards Contributory Provident Fund (C.P.F) alongwith the contribution made by the Government to their account in the said fund, in the prescribed manner.
- b) They shall be governed by the N.W.F.P Civil Servants Act, 1973, all the laws applicable to the Civil Servants and the Rules made hereunder.
- c) They shall, initially be on probation for a period of two years extendable upto three years.
- d) The services of each employee will be liable to termination at any time without assigning any reason or serving any notice before expiry of the period of probation/extended period of probation, if his/her work during this period is not found satisfactory.
- e) In case any of the employees wishes to resign at any time, an advance notice of one month's shall be necessary or in lieu thereof a month's pay shall be forfeited to government.
- f) The appointment is subject to the satisfactory report on the verification of his/her character antecedent and production of medical certificate of fitness from Civil Surgeon Police Services Hospital Peshawar.
- g) They will not be entitled to any TA/DA on their first appointment as Range Officer Wildlife.

If the above terms and conditions are acceptable to them, they should report to the office of undersigned within 14 days.

5/11
(Dr. Muhammad Mumtaz Malik)
Chief Conservator Wildlife NWFP
Peshawar.

No. 2248-59 NWL (E)

Copy forwarded to:-

1. Deputy Secretary-I, N.W.F.P Public Service Commission, Peshawar with reference to his No. SR-I/45140 dated: 6.11.2008 for information.
2. Section Officer (Estt.), Government of NWFP, Environment Department, Peshawar with reference to his letter cited above for information, please.

Con/MP-2

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(ANNEX - III)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ENVIRONMENT DEPARTMENT

Dated Pesh: 3rd October, 2014

"B"
10

NOTIFICATION

NO. SO(F&T)Envy/II-G/PSC/2k14: The Competent Authority, on the recommendation of Khyber Pakhtunkhwa Public Service Commission, is pleased to appoint the following Sub Divisional Wildlife Officer BS-17 (Rs.16000-1200-40000), in Wildlife Department, Khyber Pakhtunkhwa, subject to the terms and conditions mentioned hereunder:-

S.No.	Name and Parentage
1-	Mr. Ejaz Ahmad S/O Fazal Khaliq
2-	Mr. Muhammad Abdus Samad S/O Abdul Ghaffar
3-	Mr. Salah Ud Din Ayubi S/O Jamal Ud-Din
4-	Mr. Muhammad Idrees S/O Abdul Haleem
✓ 5-	Miss. Haseena Anbarin D/O Safdar Ali Khan
6-	Miss Maria Marjan D/O Lal Marjan
7-	Mr. Ayaz Ali Shah S/O Nazir Ali Shah
8-	Mr. Niamatullah Khan S/O Sher Ajam Khan
9-	Mr. Ishtiaquloh S/O Amanullah Khan

TERMS AND CONTIONS

- 1- They shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, and other laws applicable to the Civil Servant and the rules made there-under;
 - 2- They shall, initially, be on probation for a period of one year extendable for further two years;
 - 3- Their services shall be liable to termination at any time without assigning any reasons thereof before the expiry of the period of probation/extended period of probation. If their performance during this period is not found satisfactory, in such an event, they shall be given one month prior notice of termination from service or one month pay in lieu thereof;
 - 4- In case they wish to resign at any time, a month prior notice shall be necessary or in lieu thereof, one month's pay shall be forfeited;
 - 5- They shall not be entitled to any TA/DA on their first appointment as Sub Divisional Wildlife Officer (BS-17);
 - 6- Their appointments are subject to the verification of qualification degrees /certifications from concerned Board/University Authorities.
- If the above terms and conditions are acceptable to them, they should report to the Conservator Wildlife, Khyber Pakhtunkhwa for duty, within 14-days, under intimation to the department.

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
ENVIRONMENT DEPARTMENT.

P.T.O.



Encls: No. 52 (Estt) Env/II-6/PSC/2014/4065-4080 Dated Pesh: the 3rd October, 2014.

Copy is forwarded to:

1. PS to Secretary Environment Department.
2. Chief Conservator Wildlife, Khyber Pakhtunkhwa Peshawar.
3. Director Recruitment, Khyber Pakhtunkhwa Public Service Commission w/r to his letter No. SR.IV/67865 dated 09/7/2014.
4. Director Budget & Accounts Cell, Environment Department.
5. Mr. Ejaz Ahmad S/O Faisal Khattak, Village & P.O. Tiana, Mohallah Shaheza... Near Malakand Flour Mills, District Malakand.
6. Mr. Muhammad Abdus Samad S/O Abdul Ghafoor, Village Jangl Killa Pibakhel P.O. Domeh Tehsil and District Bannu.
7. Mr. Mr. Salah ud Din Ayubi S/O Jamal Ud-Din, Village Achinl Payan P.O. Peshawar University Peshawar.
8. Mr. Muhammad Idrees S/O Abdul Haleem, Village & P.O. Shahpur Tehsil Alpur District Shangla.
9. Miss. Hasegna Anbarin D/O Saifdar Ali Khan, H.No.109 St: No.3, Sector K-4, Phase-III Hayatabad Peshawar.
10. Miss Maria Marjan D/O Lal Marjan, Defence Officer Colony Flat 9/C, Khyber Road Peshawar Cantt.
11. Mr. Ayaz Ali Shah S/O Nazir Ali Shah, Saddat Aam Dealer, Near G.P.O. District & Tehsil Mansehra.
12. Mr. Nematullah Khan S/O Sher Ajam Khan, H.No.754/C, Mohallah Gopakhel Bannu City, Near Millad Park, Bannu.
13. Mr. Ishtiaqullah S/O Amanullah Khan, Village Lajal Killa P.O. Azam Killa District & Tehsil Bannu.
14. Personal file of the officer.
15. Master file.
16. Office order file.


(MIR ZALI KHAN)
SECTION OFFICER (ESTT)

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C
12

KH YBER PAKHTUNKHWA

Published by Authority

PESHAWAR, WEDNESDAY, 10TH OCTOBER, 2018.

**GOVERNMENT OF THE NORTH-WEST FRONTIER PROVINCE
ENVIRONMENT DEPARTMENT**

NOTIFICATION

Peshawar dated the 08/10/2007

NO. SO(Estt) /Envt/II-465 /2K5 In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Environment Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in the Forestry, Fisheries and Wildlife Department Notification No. SO (FT. II) AD/1-465/28/Vol-IV dated 26/01/1993, the following further amendments shall be made, namely:

AMENDMENT

In the Appendix, under the heading "WILDLIFE WING PART-I, PROFESSIONAL POSTS" for the existing entries in columns 2 to 5 against S.No.2,3 & 4, the following entries respectively be substituted namely:-

1.	2.	3.	4.	5.
2)	Deputy Conservator Wildlife/Divisional Wildlife Officer (BPS-18)			By promotion, on the basis of seniority-cum-fitness, from amongst holders of posts of Sub Divisional Wildlife Officers (BPS-17) with five years service as such, who have successfully completed such training or passed such Departmental Examination as prescribed by Government for this purpose.
3)	Sub Divisional Wildlife Officer (BPS-17)	(i) Master degree in Wildlife, Forestry or National Park Management; from a recognized University/ Institute; or (ii) M Sc Zoology or Botany in 2nd Division from a recognized University; or (iii) B Sc Wildlife/ Forestry or Bachelor of Veterinary Science/ B Sc Animal Husbandry or Doctor of Veterinary Medicine, from a recognized University/insitute	21-32 Years	(a) Twenty percent by promotion, on the basis of seniority-cum-fitness, from amongst holders of the posts of Range Officers with at least five years service as such; and (b) Eighty percent by initial recruitment NOTE: Appointment of candidates selected for the posts by the Public Service Commission shall be made subject to the following conditions - 1) The selected candidates shall undergo and successfully complete the

13

<p>4) Ranger Officer (RPS-16)</p>	<p>Note: Qualifications at S No I & II will only be considered when no suitable candidate with the qualification at S No I is available.</p> <p>(i) B Sc in Wildlife Management/Wildlife Ecology/Wildlife Biology from a recognized University or Institute with at least 2nd Division or</p> <p>(ii) B Sc Forestry from Pakistan Forest Institute, Peshawar in 2nd Division or</p> <p>(iii) B Sc from a recognized university in Zoology/ Botany as one of the subject in 2nd Division</p> <p>NOTE: Qualifications at serial No I & II will only be considered when no suitable candidate with qualification at serial No I and II is available</p>	<p>training at the Pakistan Forest Institute leading to M Sc Forestry Degree. Those already having MSc Forestry Degree from Pakistan Forest Institute shall be exempted from such training.</p> <p>2) The selected candidates shall produce certificate from the Standing Medical Board at Peshawar regarding their physical and mental fitness for performing the duties required of them.</p> <p>3) The selected candidates undergoing training at Pakistan Forest Institute shall execute a bond with the Wildlife Department to the effect that on successful completion of the training, they shall serve the Government for at least five years or in default shall refund all the expenses incurred in connection with their training and education.</p> <p>(a) Sixty-seven percent by promotion, on the basis of seniority-cum-fitness from amongst the holders of the posts of Deputy Rangers with at least four years service as such and</p> <p>(b) Thirty-three percent by initial recruitment.</p> <p>NOTE: Appointment of candidates selected for the posts by the Public Service Commission shall be subject to the following conditions:-</p> <p>(1) The selected candidates shall undergo and successfully complete the training at the Pakistan Forest Institute leading to B Sc Forestry Degree. Those already having BSc Forestry Degree from Pakistan Forest Institute shall be exempted from such training.</p> <p>(2) The selected candidates shall produce certificate from the Standing Medical Board at Peshawar for physical and mental fitness for performing the duties required of them.</p> <p>(3) The selected candidates shall execute a bond with the Wildlife Department to the</p>
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14

		effect that on successful completion of the training, they shall serve the Government for at least five years or in default shall refund all the expenses incurred in connection with their training and education
--	--	--

-Sd -
Secretary to Govt. of NWFP
Environment Department.

Printed and published by the Manager,
State. Ptg. Dept., Khyber Pakhtunkhwa, Peshawar.

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**GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT**

Dated Peshawar the, 13th July, 2020

NOTIFICATION

No.SO(Estt)FE&WD/II-8/2020: The Competent Authority, in consultation with the Provincial Selection Board, is pleased to promote the following Sub Divisional Wildlife Officers (BPS-17) (already appointed as Divisional Wildlife Officer BS-18) to the post of Divisional Wildlife Officers (BS-18) on regular basis in Wildlife Department, Khyber Pakhtunkhwa, with immediate effect:-

1	Mr. Ejaz Ahmad
2	Miss Haseena Ambarin
3	Mr. Salah ud Din Ayubi
4	Muhammad Abdus Samad
5	Mr. Niamat Ullah
6	Muhammad Idrees

2. Consequent upon their appointment, the following postings/transfers are hereby ordered, in the interest of public service, with immediate effect, till further orders:-

#	Name of Officer/ Designation /BS	From	To
1	Mr. Ejaz Ahmad, Divisional Wildlife Officers (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Malakand Wildlife Division
2	Miss Haseena Ambarin, Divisional Wildlife Officers (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Extension Wildlife Division
3	Mr. Salah ud Din Ayubi, Divisional Wildlife Officers (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Abbottabad Wildlife Division
4	Muhammad Abdus Samad, Divisional Wildlife Officers (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Kohat Wildlife Division
5	Mr. Niamat Ullah, Divisional Wildlife Officers (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Chitral Gol National Park
5	Muhammad Idrees, Divisional Wildlife Officers (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Chitral Wildlife Division

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE
DEPARTMENT

End to: No. SO (Estt) FE&WD/II-8/2016

Dated Pesh: 13th July, 2020

Copy forwarded to:-

1. Chief Conservator Wildlife, Khyber Pakhtunkhwa.
2. Conservators Wildlife, Southern and Northern Circles, Peshawar/Swat.
3. Divisional Wildlife Officers, Kohat, Malakand, Chitral and Abbottabad Wildlife Divisions.
4. Divisional Wildlife Officers, Chitral Gol National Park and Extension Wildlife Divisions.
5. Director Budget & Accounts Cell, Forestry, Environment & Wildlife Department.
6. PS to Secretary FE&W department, Khyber Pakhtunkhwa.
7. Officers concerned.
8. Personal files of the officers.
9. Master file.
10. Office order file.

*Conservator Wildlife
Peshawar
21/7/2020*

Zia-Ur-Rahman
(Zia-Ur-Rahman)
SECTION OFFICER (ESTT)

No. 4116-21 /WLDated Peshawar, 23-07-2020 /2020.

Copy forwarded to all Conservators Wildlife in Khyber Pakhtunkhwa and Divisional Forest Officer Wildlife Extension for information and necessary action.

Chief Conservator Wildlife
Khyber Pakhtunkhwa
Peshawar

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E

GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT AND WILDLIFE DEPARTMENT

NOTIFICATION

No. SO(Est)FE&WD/II-27/2K15. In pursuance of Section S(1) of the Khyber Pakhtunkhwa Civil Servant Act, 1973, read with Rule-17 Civil Servant (Appointment, Promotion and Transfer) Rules, 1989, the Competent Authority is pleased to notify/circulate final seniority list of Sub Divisional Wildlife Officer Wildlife (BPS-17) Khyber Pakhtunkhwa Wildlife Department (as stood on 01-03-2018) for general information.

FINAL SENIORITY LIST OF SUB DIVISIONAL WILDLIFE OFFICERS (BPS-17) KHYBER PAKHTUNKHWA WILDLIFE DEPARTMENT AS STOOD ON 01-03-2018

S#	Name of Officer with academic qualification	Date of Birth & Domicile	Date of First entry into Govt. Service	Regular appointment / promotion to the present post			Departmental examination	Remarks
				Date	BPS	Method of recruitment		
1	2	3	4	5	6	7	8	9
1.	Mr. Aman Ullah B.A	<u>22-12-1958</u> Mardan	<u>1-05-1982</u> BPS-05	19-12-2013	17	By Promotion	Passed	Already appointed as Deputy Conservator Wildlife (BS-18) on acting charge basis.
2.	Mr. Ijaz Ahmad M.Sc Forestry	<u>08-02-1983</u> Malakand	<u>13-10-2014</u> BPS-17	13-10-2014	17	Direct Recruitment	Passed	Already appointed as Deputy Conservator Wildlife (BS-18) on acting charge basis.
3.	Miss Haseena Ambarin M.Sc Forestry	<u>17-02-1984</u> Bannu	<u>20-11-2008</u> BPS-16	13-10-2014	17	Direct Recruitment	Passed	Already appointed as Deputy Conservator Wildlife (BS-18) on acting charge basis.
4.	Mr. Salah-ud-Din Ayubi M.Sc Forestry	<u>25-04-1980</u> Peshawar	<u>20-11-2008</u> BPS-16	13-10-2014	17	Direct Recruitment	Passed	Already appointed as Deputy Conservator Wildlife (BS-18) on acting charge basis.
5.	Mr. Muhammad Abdus Samad M.Sc Forestry	<u>28-01-1986</u>	<u>20-11-2008</u> BPS-16	13-10-2014	17	Direct Recruitment	Passed	Already appointed as Deputy Conservator Wildlife (BS-18) on acting charge basis.
6.	Mr. Niamat Ullah Khan M.Sc Forestry	<u>13-04-1982</u> North Waziristan Agency	<u>13-04-2014</u> BPS-17	13-10-2014	17	Direct Recruitment	Not passed	

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	Qualification Address	10-03-1960 Struggle	13-04-2014 BPS-17	13-10-2014	17	Recruitment	Result	Comments (BS-16) on acting charges basis
8.	Mr. Ishtiaq Ullah M.Sc Forestry	05-03-1986 Kohat	13-04-2014 BPS-17	13-10-2014	17	Direct Recruitment	Not passed	
9.	Miss Mana Marjan M.Sc Forestry	10-03-1985 Karak	13-04-2014 BPS-17	13-10-2014	17	Direct Recruitment	Passed	
10.	Mr. Rehmatullah, F.A.	15-10-1963 Bannu	02-06-1982 BPS-05	12-03-2015	17	By promotion	Passed	
11.	Mr. Muhammad Ayaz, B.A.	07-04-1961 Mardan	13-06-1982 BPS-05	17-11-2015	17	By promotion	Passed	
12.	Syed Taimur Ali Shah M. Sc Forestry	20-12-1985 Swat	31-12-2015 BPS-17	31-12-2015	17	Direct Recruitment	Not passed	
13.	Miss Manahil Wahab M. Sc Forestry	18-01-1992 D.I Khan	31-12-2015 BPS-17	31-12-2015	17	Direct Recruitment	Not passed	
14.	Mr. Kiramat Shah M. Sc Forestry	02-01-1991 Peshawar	31-12-2015 BPS-17	31-12-2015	17	Direct Recruitment	Passed	
15.	Mr. Munsif Ali, MSc Forestry	13-05-1989 Orakzai Agency Fata	31-05-2016 BPS-17	31-05-2016	17	Direct Recruitment	Not passed	
16.	Syed Sarmad Hussain Shah, MSc Forestry	18-08-1993 Mansehra	31-05-2016 BPS-17	31-05-2016	17	Direct Recruitment	Not Passed	
17.	Mr. Naveed-ul-Haq, MSc Forestry	15-05-1988 Dir Lower	20-11-2008 BPS-17	21-06-2016	17	By promotion	Passed	
18.	Mr Niaz Muhammad Matric (Arts)	01-02-1964 Mansehra	15-05-1993 BPS-17	25-05-2017	17	By promotion	Passed	

Secretary
Government of Khyber Pakhtunkhwa
Establishment Department

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18


Dated Peshawar the 03/05/2018

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NO. 9195-99/WL (E)


Copy forwarded to:-

- Chief Conservator Wildlife Khyber Pakhtunkhwa Peshawar
- Director Budget and Account Govt. Khyber Pakhtunkhwa Forestry, Environment and Wildlife Department.
- Conservators Wildlife Southern and Northern Circles.
- Officers concerned


 (HAFIZ ABDUL JALIL)
 SECTION OFFICER (ESTT)

No. 9195-99 /WL (E) Dated Peshawar the 19/6/ 2018.

Copy forwarded to Conservators Wildlife Southern, Northern Circles, PDs/Conservator Wildlife Peshawar Zoo, National Park, and DFO Wildlife Extension Peshawar for information and circulation amongst all concerned under their jurisdiction for necessary action.


 Chief Conservator Wildlife
 Khyber Pakhtunkhwa
 Peshawar

Handwritten initials

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785

GOVERNMENT OF KHYBER PAKHTUNKHWA
CLIMATE CHANGE, FORESTRY, ENVIRONMENT AND WILDLIFE DEPARTMENT

NOTIFICATION

No. SO (Estt) Env/IV-9/2K10. In pursuance of Section 8(1) of the Khyber Pakhtunkhwa Civil Servant Act, 1973, read with Rule-17 Civil Servant (Appointment, Promotion and Transfer) Rules, 1989, the Competent Authority (Chief Secretary Government of Khyber Pakhtunkhwa Peshawar) is pleased to notify/circulate tentative seniority list of Deputy Conservator Wildlife/Divisional Wildlife Officer (BPS-18) Khyber Pakhtunkhwa, Wildlife Department (as it stood on 30-06-2023) for general information.

**TENTATIVE SENIORITY LIST OF DEPUTY CONSERVATOR WILDLIFE/DIVISIONAL WILDLIFE OFFICER (BPS-18) KHYBER PAKHTUNKHWA WILDLIFE DEPARTMENT
AS ON 30-06-2023**

1. Total sanctioned strength =32
2. Total effective strength =26

S #	Name of Officer and Academic Qualification	Date of Birth and Domicile	Date of 1 st Entry into Govt. Service	Regular Appointment/Promotion to the present post			Remarks
				Date	BPS	Method of Recruitment/ Appointment	
1	2	3	4	5	6	7	8
1	Mr. Abdul Ghafoor, M Sc Forestry (Extension) and MS Wildlife Ecology Management	01-01-1968 Swat	28-10-1992 BPS-16	02-05-2012	18	By Promotion	
2	Mr. Mohammad Hussain-II, M.Sc Forestry	05-02-1969 Mohmand Agency	28-10-1992 BPS-16	02-05-2012	18	By Promotion	
3	Mr. Itikhar-uz-Zaman, M.Sc Forestry, Botany and M.S Wildlife Biology	10-04-1971 Abbottabad	29-02-1996 BPS-16	02-05-2012	18	By Promotion	
4	Mr. Mohammad Ayaz Khan, M.Sc Forestry and Wildlife Biology	01-09-1971 Mardan	29-02-1996 BPS-16	02-05-2012	18	By Promotion	
5	Mr. Mohammad Niaz, M.Sc Forestry and MS Wildlife Biology	12-04-1972 Mardan	29-02-1996 BPS-16	02-05-2012	18	By Promotion	
6	Mr. Sajjad Ali, M Sc Forestry, Botany and Wildlife Biology	15-04-1969 Mohmand Agency	29-02-1996 BPS-16	02-05-2012	18	By Promotion	
7	Mr. Mohammad Shakeel, M.S Forestry and Economics	10-06-1972 ✓ Abbottabad	23-02-1997 ✓ BPS-16	02-05-2012	18	By Promotion	
8	Mr. Mohammad Israr, M Sc Forestry and Post Graduate Diploma in GIS	02-01-1973 ✓ Mohmand Agency	12-03-1997 ✓ BPS-16	02-05-2012	18	By Promotion	

S #	Name of Officer and Academic Qualification	Date of Birth and Domicile	Date of 1 st Entry into Govt. Service	Regular Appointment/Promotion to the present post			Remarks
				Date	BPS	Method of Recruitment/Appointment	
1	2	3	4	5	6	7	8
9	Mr Mohammad Faique Khan, M Sc Forestry	✓ 12-03-1974 Swat	12-03-1997 BPS-16	02-05-2012	18	By Promotion	
10	Mr Abdul Haleem Khan, M Sc Zoology, B.Sc Forestry, and B.Ed	✓ 20-03-1971 Lakki Marwat	12-03-1997 BPS-16	02-05-2012	18	By Promotion	
11	Mr Khan Malook Khan, B Sc Forestry	✓ 10-07-1974 Bannu	12-03-1997 BPS-16	02-05-2012	18	By Promotion	
12	Mr Ejaz Ahmad M Sc Forestry	08-02-1983 Malakand	13-10-2014 BPS-17	13-07-2020	18	By Promotion	
13	Miss Haseena Ambarin M Sc Forestry M Phil	17-02-1984 Bannu	20-11-2008 BPS-16	13-07-2020	18	By Promotion	
14	Mr Salah-ud-Din Ayubi M Sc Forestry	25-04-1980 Peshawar	20-11-2008 BPS-16	13-07-2020	18	By Promotion	
15	Mr Muhammad Abdus Samad M Sc Forestry	28-01-1986 F.R Bannu	20-11-2008 BPS-16	13-07-2020	18	By Promotion	
16	Mr Niamat Ullah Khan, M Sc Forestry	13-04-1987 North Waziristan Agency	13-10-2014 BPS-17	13-07-2020	18	By Promotion	
17	Mr Muhammad Idress M Sc Forestry	10-04-1982 Shangla	13-10-2014 BPS-17	13-07-2020	18	By Promotion	
18	Mr Ishtiaq Ullah M Sc Forestry Post Graduate Diploma in GIS/RS	05-03-1986 FR Bannu	13-10-2014 BPS-17	11-08-2021	18	By Promotion	
19	Miss Maria Marjan M Sc Forestry	10-03-1985 Karak	13-10-2014 BPS-17	11-08-2021	18	By Promotion	
20	Mr Rehmatullah, F.A	15-10-1963 Bannu	02-06-1982 BPS-05	11-08-2021	18	By Promotion	
21	Syed Taimur Ali Shah M Sc Forestry	20-12-1985 Swat	31-12-2015 BPS-17	11-08-2021	18	By Promotion	

22	Mrs. Manahil Wahab M Sc Forestry M Phil Wildlife Management	18-01-1992 DI Khan	31-12-2015 BPS-17	11-08-2021	18	By Promotion
23	Mr. Karamat Shah M Sc Forestry	02-01-1991 Peshawar	31-12-2015 BPS-17	11-08-2021	18	By Promotion
24	Mr. Munsef Ali, M Sc Forestry	13-05-1989 Orakazai Agency (FATA)	31-05-2016 BPS-17	11-08-2021	18	By Promotion
25	Syed Sarmad Hussain Shah, M Sc Forestry	18-08-1993 Mansehra	31-05-2016 BPS-17	18-04-2022	18	By Promotion
26	Mr. Naveed-Ul-Haq, M Sc Forestry	15-05-1988 Dir (Lower)	20-11-2008 BPS-16	18-04-2022	18	By Promotion

793

SECRETARY
TO GOVT. OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

Endst No. SO (Estt)FE&WD/II-26/2K15

dated the Peshawar, _____ / _____ / 2023.

- Copy is forwarded to:-
- 1 Chief Conservator Wildlife Khyber Pakhtunkhwa, Peshawar
 - 2 Director Budget and Account Govt. Khyber Pakhtunkhwa Forestry, Environment and Wildlife Department
 - 3 All Conservators Wildlife in Khyber Pakhtunkhwa.
 - 4 Officers concerned.

SECTION OFFICER (ESTT)

Dated: 24/08/2023

The Secretary
Govt of Khyber Pakhtunkhwa
Climate Change, Forestry, Environment and
Wildlife Department,
Peshawar

THROUGH PROPER CHANNEL

Subject: REPRESENTATION FOR ADJUSTMENT OF INTERSE SENIORITY

It is certified that I Mr. Muhammad Abdus Samad Khan, Divisional Forest Officer Wildlife presently working as Divisional Forest Officer Wildlife Kohat National Park with additional charge of Kohat Wildlife Division was first recommended by Public Service Commission (PSC) as Range Officer Wildlife (BPS-16) vide Public Service Commission Recommendation's Notification No.SR-I/45140 dated 06/11/2008 (Annex-I). Subsequently, Chief Conservator Wildlife issued recruitment orders of the undersigned as Range Officer Wildlife vide Officer Order No.43 dated 18/11/2008 (Annex-II). The undersigned joined the service and performed duties at different stations in the province. It is pertinent to mention that Government of Khyber Pakhtunkhwa Forest, Environment and Wildlife Department advertised 07 posts of Sub Divisional Wildlife Officers through Public Service Commission in the year 2011 vide Advt. No.01/2011 Sr.10. The undersigned applied to the post through proper channel and accordingly selected as Sub Divisional Forest Officer Wildlife in the year 2014 and recruited as Sub Divisional Wildlife Officer (BPS-17) vide Government of Khyber Pakhtunkhwa Forest, Environment and Wildlife Department notification No. SO(Estt) Env/II-6/PSC/2k14 dated 03/10/2014 (Annex-III). In the year 2018, the Govt. of KP FE&WD appointed the undersigned as DFO Wildlife (BPS-18) by the PSB vide Administrative Department Notification No.SO(Estt)/FE&WD/1-8/2016/762-66 dated 17/01/2018 on acting charge basis. However, it is pointed out that the service experience of the undersigned as Range Officer Wildlife (BPS-16) comprising over 06 years was not taken into account for promotion according to Promotion Policy whereby mentioned that half of Service of BPS-16 will be counted in the length of service in BPS-17. The undersigned was eligible for promotion in the year 2018. If his half service of BPS-16 was counted, then the undersigned would have been promoted on regular charge basis to DFO Wildlife (BPS-18) in the year 2018 vide Notification No.SO(Estt)/FE&WD/II-9/2018 dated 13/07/2018, however the promotion was made on acting charge basis. As such, the undersigned feels aggrieved of the seniority issued by the Government. Mr. Ijaz Ahmad stands at S.No.02 of the seniority list of the Sub Divisional Wildlife Officer (BPS-17) issued vide notification No.SO(Estt)/FE&WD/II-27/2K15/5423-26 dated 03/05/2018 and the undersigned was placed at serial#03. Whereas, lot of officers were promoted in the year 2018 to post of DFO Wildlife (BPS-18) and by that time the seniority did not affected the undersigned. However, in future the seniority list may affect the undersigned in promotion to Conservator Wildlife (BPS-19). Therefore, the services of the undersigned offered as Range Officer Wildlife (BPS-16) may considered towards seniority and be placed at a right position.


In view of above, it is prayed that seniority list may be revised and the undersigned may be placed at the right place of the seniority, please.

(Muhammad Abdus Samad)
Divisional Wildlife Officer
Wildlife Division Kohat

Copy to Chief Conservator Wildlife, Khyber Pakhtunkhwa, Peshawar for information and necessary action, please.

(Muhammad Abdus Samad)
Divisional Wildlife Officer
Wildlife Division Kohat

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	GOVERNMENT OF KHYBER PAKHTUNKHWA CLIMATE CHANGE, FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
	NO.SO(Estt)/FE&WD/II-39/2023 /8982 Dated Peshawar the, 18 th September, 2023

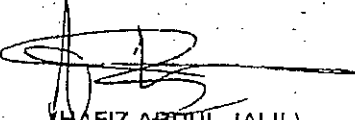
23

To ✓ The Chief Conservator Wildlife,
Khyber Pakhtunkhwa,
Peshawar.

Subject: DEPARTMENTAL APPEAL/ISSUANCE OF FINAL SENIORITY LIST OF DIVISIONAL WILDLIFE OFFICERS (BS-18).

I am directed to refer to your office letter No. 1551/WL (E) dated 28th August, 2023 on the subject cited above and to state that the appeals of the applicants have been examined/considered and rejected being not covered under the rules, however, other financial benefits of previous service in BS-16 may be given to them as per rules/policy.

2. it is therefore, request that final seniority list of DWO's (BS-18) may be prepared and furnished to this department after fulfillment of all codal formalities, for notifying /approval of the competent authority, please.


(HAFIZ ABDUL JALIL)
SECTION OFFICER (ESTT)

Endst: No: & date even

No 2230-33 WL(E)

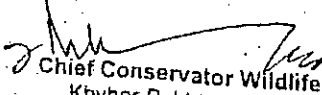
Dated Peshawar the 20/9/2023

Copy forwarded for information and necessary action to the:

1. Conservator Wildlife Southern Circle Bannu.
2. Director/Conservator Wildlife Peshawar Zoo.
3. Divisional Forest officer Wildlife Headquarters Peshawar.
4. Divisional Forest Officer Wildlife Kohat.

They are requested to inform the following concerned officer under their jurisdiction accordingly.

#	Name of DWOs	Office
1.	Mr. Salah Ud Din	DFO Wildlife Headquarter
2.	Mr. Muhammad Abdus Samad	DFO Wildlife Kohat
3.	Miss Haseena Anbarin	Deputy Director Peshawar Zoo


Chief Conservator Wildlife
Khyber Pakhtunkhwa
Peshawar

OFFICE OF THE CHIEF CONSERVATOR WILDLIFE
KHYBER PAKHTUNKHWA PESHAWAR

10

The Secretary
Government of Khyber Pakhtunkhwa
Climate Change, Forestry Environment and Wildlife Department
Peshawar

No 1551

AWL(E)

dated Peshawar the 28-08-2023

24

SUBJECT DEPARTMENTAL APPEAL / ISSUANCE OF FINAL SENIORITY LIST
OF DIVISIONAL WILDLIFE OFFICERS (BPS-18)

Kindly find enclosed herewith self-explanatory appeals preferred by the following three officers of Khyber Pakhtunkhwa Wildlife Department who are working as Divisional Forest Officers Wildlife with the plea that their six years service as Range Officer Wildlife was not considered for promotion from the post of Sub Divisional Wildlife Officer (BPS-17) to the post of Divisional Forest Officer Wildlife (BPS-18) as per Promotion Policy whereby mentioned that half of service of BPS-16 will be counted in the length of service in BPS-17.

S#	NAME OF DWOS	OFFICE	Annexure
01	Mr. Salah Ud Din	DFO Wildlife Headquarters Peshawar	I
02	Mr. Abdus Sammad	DFO Wildlife Kohat	II
03	Miss. Haseena Anbarin	Deputy Director Peshawar Zoo	III

These officers claimed that they were eligible for promotion in the year 2018 and their seniority placement is not correct. Hence, the officers requested that their seniority as DFO Wildlife (BPS-18) may be considered from 2018.

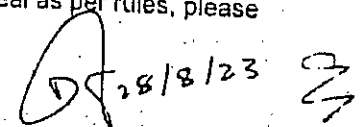
It is worth mentioning that as per service rules of the Sub Divisional Wildlife Officers, 80% candidates will be recruited by initial recruitment and 20 % by promotion. The service rules for promotion to Divisional Forest Officer Wildlife (BPS-18) is 100% promotion quota from the post of Sub Divisional Forest Officers Wildlife (BPS-17) with at-least five years service as such.

It is further added that as per Rule 17 (2) of Civil Servant Appointment, Promotion and Transfer Rules 1989, the seniority of civil servant shall be determined with reference to the date of their regular appointment to the post in that cadre. Therefore, nothing is mentioned for counting of service period from the post of Range Officer Wildlife (BPS-16). In these circumstances plea of the appellant is not based on the factual position.

A copy of the service rules of Sub Divisional Wildlife Officers (BPS-17) and Divisional Forest Officers Wildlife (BPS-18) alongwith Rule 17 (2) are also enclosed herewith for perusal.

Submitted herewith for consideration the appeal as per rules, please

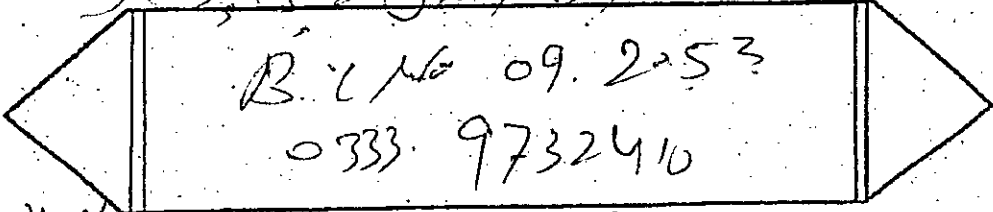
Encl: Attached


Chief Conservator Wildlife
Khyber Pakhtunkhwa
Peshawar

D:\Documents\Arlin\General Letters\Letters 2023.docx

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بعدالت سرور ٹریبیونل (10)



25 مارچ 2023ء منجانب سرور
بنام ضلع

محمد عبداللہ

سرور ٹریبیونل

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام کے لیے سرور ٹریبیونل (10) مقرر کیا گیا ہے۔
مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ برحلف دینے جو جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یا ایکٹیفکیشن یا اپیل کی برادگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ
پرداخت منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی
مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 20 مارچ 2023ء

Accepted
50

بمقام

کے لئے منظور ہے۔

محمد عبداللہ