

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR.

SERVICE APPEAL NO.1961/2023

Muhammad Nauman

VERSUS

Government of Khyber Pakhtunkhwa &
Others

S/No.	Documents.	Annexure	Page.
1	Reply/Comments.	-----	1-3
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4	Detail of visits to Directorate General Fisheries, Khyber Pakhtunkhwa, Peshawar.	A.	6-13
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Report

in administrative & financial disciplines, that too in the best interest of public "Copy is hereby enclosed as Annexure-B". The appellant complied his posting orders, & relinquished himself from Fisheries Department, District Mardan with effect from 14-06-2023 (AN) vide No.273-78/DOF/M dated.14-06-2023 "Copy is hereby enclosed as Annexure-C" & reported for duty in the Fisheries Department, District Nowshera on 15/06/2022 (FN) "Copy is hereby enclosed as Annexure- D" & regularly getting his salary & other allied facilities.

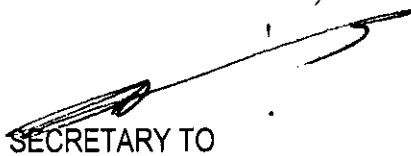
- 2- Incorrect, as already been explained above in para-01.
- 3- Incorrect. The factual position has already been explained above in para-01. Furthermore, both the departmental representation dated.01-06-2023 of the appellant as mentioned in the para was received on 20-06-2023 Annexure- E & the writ petition No.2406-P/2023 was also been disposed of by the Peshawar High Court, Peshawar during the preliminary hearing unilaterally on 15-06-2023, after relinquishing of charge of the post of Assistant Director Fisheries, District Mardan on 14-06-2023 by the appellant was automatically become infructuous in its present form, therefore no further action was taken by the respondents.
- 4- Incorrect, hence denied. The factual position has already been explained above in para-01 & para-03.
- 5- Incorrect. The appellant himself matured the posting/transfer order dated.26-05-2023, then how he aggrieved & considering the instant posting transfer as impugned, therefore, the instant appeal is requested to be dismissed throughout in the larger interest of justice.


GROUND.

- A. Incorrect. The factual position has already been explained above in para-01, para-03 & para-05 of the reply on the facts.
- B. Incorrect. The FIR dated.10-05-2023 mentioned in the instant para, which was lodged against the MNAs/MPAs has no concerned with the appointment process of the Fisheries Department, District Mardan, as no interference/ involvement of any such MNAs/MPAs in the recruitment process was found in the record of the Fisheries Department, District Mardan, therefore the nomination of Respondent No.03 in the said FIR is not understandable. However, the scenario behind the posting/transfer of the appellant has been explained above in para-01, Para-03 & para-05 of the reply on the facts.

- C. Incorrect. The factual position has already been explained above in para-01, Para-03 & para-05 of the reply on the facts.
- D. Incorrect. The factual position has already been explained above in para-01, Para-03 & para-05 of the reply on the facts.
- E. The respondents also seek permission to raise additional grounds at the time of arguments.

It is therefore requested that on acceptance of the instant para wise comments, the appeal of the appellant may kindly be dismissed.


SECRETARY TO
GOVERNMENT OF KHYBER PAKHTUNKHWA
LIVESTOCK, FISHERIES & COOPERATIVE
DEPARTMENT.
(Respondent No.1)
(MUHAMMAD ISRAR)


DIRECTOR GENERAL FISHERIES,
KHYBER PAKHTUNKHWA
PESHAWAR
(Respondent No.2)
(KHISRAD KALIM)

(21)
4

AUTHORITY LETTER.

Mr. Ghulam Muhammad, Superintendent BPS-17, Directorate General Fisheries, 2-Shami Road Peshawar is hereby authorized to submit affidavit & attend Khyber Pakhtunkhwa, Service Tribunal in service appeal No.1961/2023 titled "Muhammad Nauman Vs Government of Khyber Pakhtunkhwa & Others" on behalf of undersigned on each & every date of hearing till the decision.



SECRETARY TO
GOVERNMENT OF KHYBER PAKHTUNKHWA
LIVESTOCK, FISHERIES & COOPERATIVE
DEPARTMENT.
(Respondent No.1)

(MUHAMMAD ISRAR)



DIRECTOR GENERAL FISHERIES,
KHYBER PAKHTUNKHWA
PESHAWAR
(Respondent No.2)

(KHISRAO KALIM)

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

SERVICE APPEAL NO.1961/2023

Muhammad Nauman

VERSUS

Government of Khyber Pakhtunkhwa &
others

AFFIDAVIT.

I, Khisrao Kalim, Director General Fisheries Khyber Pakhtunkhwa Peshawar, do hereby solemnly affirm and declare that the contents of the accompanying parawise comments submitted by the Respondents are true to the best of my knowledge & belief & that nothing has been concealed from this Hon'able Court. It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense have been struck off/*Cost.*



Deponent

(Khisrao Kalim),

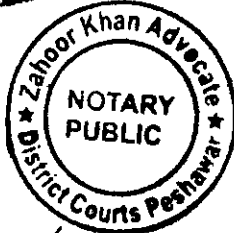
NIC NO. 17101-0425924-7

CELL NO. 0333-9774383

Respondent No-2



ATTESTED



11/12/2023



OFFICE OF THE
DISTRICT OFFICER FISHERIES
CHARSADDA

A 118

6

TOUR PROGRAM IN R/O MUHAMMAD NUMAN, DISTRICT OFFICER
FISHERIES, CHARSADDA FOR THE MONTH OF MAY, 2021.

Sl. No.	Dated	From	To	Purpose of Journey
1.	12/04/2021	Charsadda	Peshawar	Proceeded to Peshawar for pursuance of various cases at Directorate of Fisheries, Khyber Pakhtunkhwa.
2.	20/04/2021	Charsadda	Peshawar	-do-
3.	24/04/2021	Charsadda	Peshawar	-do-

Muhammad Numan

(Muhammad Numan)
District Officer Fisheries
Charsadda

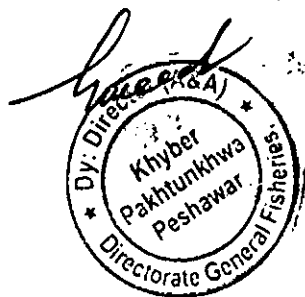
104 /DOF(CHD)/Contingencies/2020-21

Dated 25th May, 2021.

Approved and forwarded to the Director Accounts Officer, Charsadda for
information and payments, please.

Muhammad Numan

District Officer Fisheries
Charsadda





A (2/8) (7)

**OFFICE OF THE
DISTRICT OFFICER FISHERIES
GULBAHAR NO.2 OPP: EDUCATOR SCHOOL
MARDAN ROAD, CHARSAJDA
PHONE # 091-6515158**

**TOUR PROGRAM IN I/O MUHAMMAD NUMAN, DISTRICT OFFICER
FISHERIES, CHARSAJDA FOR THE MONTH OF JULY, 2021.**

S.No.	Dated	From	To	Purpose of Journey
1.	02/07/2021	Charsajda	Peshawar & Back	Checking of Field Area, Palai Dam,
2.	05/07/2021	Charsajda	Shabqdar & Back	Private Fish Farms etc and proceeded
3.	08/07/2021	Charsajda	Tangi & Back	to Peshawar for discussion and
4.	09/07/2021	Charsajda	Peshawar & Back	pursuance of various cases with
5.	12/07/2021	Charsajda	Shabqdar & Back	Director General Fisheries, Khyber
6.	13/07/2021	Charsajda	Tangi & Back	Pakhtunkhwa, Peshawar
7.	16/07/2021	Charsajda	Peshawar & Back	-do-
8.	19/07/2021	Charsajda	Shabqdar & Back	-do-
9.	26/07/2021	Charsajda	Tangi & Back	-do-
10.	27/07/2021	Charsajda	Peshawar & Back	-do-
11.	28/07/2021	Charsajda	Shabqdar & Back	-do-
12.	30/07/2021	Charsajda	Tangi & Back	-do-

M Numan
(Muhammad Numan)
District Officer Fisheries
Charsajda

No. 216-17 /DOF(CHD)/Contingencies/2020-21

Dated 12th Novem,ber, 2021.

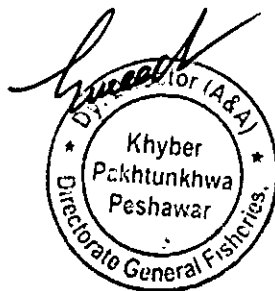
Approved and forwarded to the Director Accounts Officer, Charsajda for information and payments, please.

Approved

M Numan
District Officer Fisheries
Charsajda

No. 777 DGP/B&A
dated 17/11/2021

Qasim Ali
Director General Fisheries





A (37/18) 89

OFFICE OF THE
DISTRICT OFFICER FISHERIES
GULBAHAR NO.2 OPP: EDUCATOR SCHOOL
MARDAN ROAD, CHARSADDA
PHONE # 091-6515158

TOUR PROGRAM IN R/O MUHAMMAD NUMAN, DISTRICT OFFICER
FISHERIES, CHARSADDA FOR THE MONTH OF AUGUST, 2021.

S.No.	Dated	From	To	Purpose of Journey
1.	02/08/2021	Charsadda	Peshawar & Back	Checking of Field Area, Palai Dam.
2.	04/08/2021	Charsadda	Shabqdar & Back	Private Fish Farms etc and proceeded
3.	05/08/2021	Charsadda	Tangi & Back	to Peshawar for discussion and
4.	09/08/2021	Charsadda	Peshawar & Back	pursuance of various cases with
5.	10/08/2021	Charsadda	Shabqdar & Back	Director General Fisheries, Khyber
6.	12/08/2021	Charsadda	Tangi & Back	Pakhtunkhwa, Peshawar
7.	13/08/2021	Charsadda	Peshawar & Back	-do-
8.	16/08/2021	Charsadda	Shabqdar & Back	-do-
9.	17/08/2021	Charsadda	Tangi & Back	-do-
10.	23/08/2021	Charsadda	Peshawar & Back	-do-
11.	26/08/2021	Charsadda	Shabqdar & Back	-do-
12.	30/08/2021	Charsadda	Tangi & Back	-do-

M Numan
(Muhammad Numan)
District Officer Fisheries
Charsadda

No. 216-17 /DOF(CHD)/Contingencies/2020-21

Dated 12th Novem,ber. 2021.

Approved and forwarded to the Director Accounts Officer, Charsadda for information and payments, please.

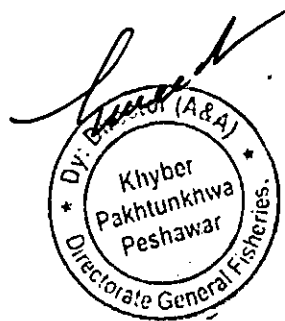
Approved

M Numan
District Officer Fisheries
Charsadda

No. 778 DGP/BFA

*Quoted in
Dy. Director Fisheries
Peshawar*

dated 17/11/2021





OFFICE OF THE
DISTRICT OFFICER FISHERIES
GULBAHAR NO.2 OPP: EDUCATOR SCHOOL
MARDAN ROAD, CHARSADDA
PHONE # 091-6515158

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TOUR PROGRAM IN RO MUHAMMAD NUMAN, DISTRICT OFFICER
FISHERIES, CHARSADDA FOR THE MONTH OF SEPTEMBER, 2021.

S.No.	Dated	From	To	Purpose of Journey
1.	01/09/2021	Charsadda	Peshawar & Back	Checking of Field Area, Palai Dam.
2.	03/09/2021	Charsadda	Shabqdar & Back	Private Fish Farms etc and proceeded
3.	06/09/2021	Charsadda	Tangi & Back	to Peshawar for discussion and
4.	07/09/2021	Charsadda	Peshawar & Back	pursuance of various cases with
5.	10/09/2021	Charsadda	Shabqdar & Back	Director General Fisheries, Khyber
6.	13/09/2021	Charsadda	Tangi & Back	Pakhtunkhwa, Peshawar
7.	14/09/2021	Charsadda	Peshawar & Back	-do-
8.	17/09/2021	Charsadda	Shabqdar & Back	-do-
9.	20/09/2021	Charsadda	Tangi & Back	-do-
10.	23/09/2021	Charsadda	Peshawar & Back	-do-
11.	27/09/2021	Charsadda	Shabqdar & Back	-do-
12.	30/09/2021	Charsadda	Tangi & Back	-do-

M Numan
(Muhammad Numan)
District Officer Fisheries
Charsadda

No. 816-17 /DOF(CHD)/Contingencies 2020-21

Dated 12th Novem,ber, 2021.

Approved and forwarded to the Director Accounts Officer, Charsadda for information and payments. please.

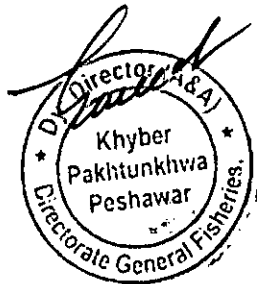
M Numan
District Officer Fisheries
Charsadda

K. P. P. P.

*Director General Fisheries
Khyber Pakhtunkhwa
Peshawar.*

No= 779 DGF/BKA

checked 17/11/2021



A 578 10

**TOUR PROGRAM OF MR. MUHAMMAD NAUMAN, DISTRICT OFFICER FISHERIES,
CHARSADDA FOR THE MONTH OF 04/2022**

DATE	FROM	TO	MODE OF JOURNEY	PURPOSE
04-2022	Charsadda	Peshawar & Back	Govt; Vehicle	To checked and discuss Fish Seed size of the Rahu, Grass, Mori for stocking.
04-2022	Charsadda	Tangi & Back	-do-	Visit the area and checked illegal Fishing and private Fish Farms.
04-2022	Charsadda	River Kabul, Swat & Back	-do-	Visit the rivers and checked illegal fishing.
07-04-2022	Charsadda	Shabqadar & Back	-do-	To checked area for the control of illegal fishing, in River Kabul.
11-04-2022	Charsadda	Peshawar & Back	-do-	Attended the DDF Headquarter for the issue of Dam payment.
12-04-2022	Charsadda	Palay & Back	-do-	Visit to Palay Dam and Checked illegal fishing in Tangi Area.
14-04-2022	Charsadda	Rivers & Back	-do-	Checked Illegal Fishing in various rivers in Charsadda.
15-04-2022	Charsadda	Shakh 6 & Back	-do-	Visit the Area and Checked illegal Fishing and Private Fish Farms.
19-04-2022	Charsadda	Shabqadar & Back	-do-	Checked illegal Fishing in the area and river Charsadda.
20-04-2022	Charsadda	River Kabul & Back	-do-	Visit the river and checked illegal fishing.
22-04-2022	Charsadda	River Jindi & Back	-do-	To Checked Illegal fishing in the river.
25-04-2022	Charsadda	Mardan & Back	-do-	Checked Fish size for stocking of Dam and River.
27-04-2022	Charsadda	Peshawar & Back	-do-	Attend the DG Fisheries KPK about issue of stocking.
28-04-2022	Charsadda	Tangi & Back	-do-	Visit private Fish Farms in the area.
29-04-2022	Charsadda	Mohmand Agency & Back	-do-	Discussion with DOF Mohmand about Dam and River Issues.

No. 761 DOF (CHD)

Dated Charsadda the 24/05/2022

Submitted to Director General Fisheries Khyber Pakhtunkhwa Peshawar for favor of approval please.

Approved

Out

Director General Fisheries
Khyber Pakhtunkhwa
Peshawar

[Signature]

DISTRICT OFFICER FISHERIES
CHARSADDA

No. 1869/DGFIBDA

dated 25/05/2022



(29)
A (6/8) (11)

**TOUR PROGRAM OF MR. MUHAMMAD NAUMAN, DISTRICT OFFICER FISHERIES,
CHARSADDA FOR THE MONTH OF 05/2022**

DATE	FROM	TO	MODE OF JOURNEY	PURPOSE
02-05-2022	Charsadda	Peshawar CH&TC & Back	Govt. Vehicle	To checked and discuss Fish Seed size of the Rahu, Grass, Mori for stocking.
07-05-2022	Charsadda	Shabqadar & Back	-do-	Visit the area and checked illegal Fishing and private Fish Farms.
09-05-2022	Charsadda	Peshawar & Back	-do-	Attended the DDF Headquarter for the issue of Dam payment.
10-05-2022	Charsadda	Tangi & Back	-do-	To checked area for the control of illegal fishing, and Private Fish Farms.
11-05-2022	Charsadda	Mardan & Back	-do-	Attended the DDF Headquarter for the issue of Dam payment.
12-05-2022	Charsadda	Palay & Back	-do-	Visit to Palay Dam and Checked Illegal fishing in Tangi Area.
13-05-2022	Charsadda	River Swat, Kabul & Back	-do-	Checked Illegal Fishing in various rivers in Charsadda.
14-05-2022	Charsadda	Shabqadar & Back	-do-	Visit the Area and Checked illegal Fishing and Private Fish Farms.
16-05-2022	Charsadda	Peshawar & Back	-do-	Attend the DG Fisheries KPK about issue of stocking.
18-05-2022	Charsadda	Mardan & Back	-do-	Checked Fish size for stocking of Dam and River.
19-05-2022	Charsadda	Mardan & Back	-do-	Checked Fish size for stocking of Dam and River.
20-05-2022	Charsadda	Tangi & Back	-do-	Visit the Area and Checked illegal Fishing and Private Fish Farms.
23-05-2022	Charsadda	Peshawar & Back	-do-	Attend the DG Fisheries KPK about issue of stocking.
24-05-2022	Charsadda	Sher Abad, Peshawar & Back	-do-	Checked Fish size for stocking of Dam and River.
26-05-2022	Charsadda	Shabqadar & Back	-do-	Visit the Area and Checked illegal Fishing and Private Fish Farms.
28-05-2022	Charsadda	River Swat, Kabul & Back	-do-	To Checked Illegal fishing in the river.
30-05-2022	Charsadda	Shakh 6 & Back	-do-	Visit private Fish Farms in the area.
31-05-2022	Charsadda	Palay & Back	-do-	Observations in Palay Dam to Check Water level and Other issues.

No. 890 DOF (CHD)

Dated Charsadda the 10/6/2022

Submitted to Director General Fisheries Khyber Pakhtunkhwa Peshawar for favor of approval please.

Amrul
Qadir Khan
Director General Fisheries
Khyber Pakhtunkhwa
Peshawar.

[Signature]
DISTRICT OFFICER FISHERIES
CHARSADDA



(3)
A (7/8) (12)

**TOUR PROGRAM OF MR. MUHAMMAD NAUMAN, DISTRICT OFFICER FISHERIES, CHARSADDA FOR THE
MONTH OF 08/2022**

DATE	FROM	TO	MODE OF JOURNEY	PURPOSE
01-08-2022	Charsadda	Peshawar & back to office	Govt. Vehicle	Discussed Office matters with Director General Fisheries KP
02-08-2022	Charsadda	Nisatta river Kabul bridge and back	-do-	Monitored Nisatta fisheries field group and their activities in the given area.
03-08-2022	Charsadda	Tangi, Jindi area & back	-do-	Checked field staff activities against illegal fishing in Tangi and Kaniwar area.
04-08-2022	Charsadda	Palay Dam, Abazai & back	-do-	Assessed Palay Dam situation, directed staff to control illegal fishing in Abazai area
08-08-2022	Charsadda	Peshawar & back to office	-do-	Discussed Palay Dam matters with Director (HQ), Peshawar
09-08-2022	Charsadda	Munda headworks & back	-do-	Upon complaints regarding electro-fishing visited Munda headworks area
10-08-2022	Charsadda	Peshawar & back to office	-do-	Meeting with the Director General Fisheries KP
11-08-2022	Charsadda	Nisatta, Dheri zardad area and back	-do-	Visited area and monitored staff activities
15-08-2022	Charsadda	Peshawar & back to office	-do-	Meeting with Deputy Director (HQ), Peshawar
16-08-2022	Charsadda	River Khyali and back	-do-	Visited area and monitored staff activities
18-08-2022	Charsadda	Tangi, Kaniwar and back	-do-	Monitored sites and noticed illegal fishing
19-08-2022	Charsadda	River Kabul & back	-do-	Visit River Kabul and River Swat. Checked illegal fishing with field Staff.
22-08-2022	Charsadda	Peshawar & back to office	-do-	Discussed Field related issues with Director General Fisheries KP.
24-08-2022	Charsadda	Palay Dam, Abazai and back to office	-do-	Visited Palay and instructed contractor to submit pending liabilities of Palay Dam.
26-08-2022	Charsadda	Peshawar & back to office	-do-	Discussed Dam Matters with Director (HQ).
30-08-2022	Charsadda	Shabqadar and back	-do-	Checked various sites alongside river Kabul and instructed staff to control illegal fishing

No. 1452 DOF (CHD)

Dated Charsadda on 08/9/2022

Submitted to Director General Fisheries Khyber Pakhtunkhwa Peshawar for favor of approval please.

Muhammad Nauman
DIRECTOR FISHERIES
Khyber Pakhtoon Khwa
Province Peshawar.

Muhammad Nauman
DISTRICT OFFICER FISHERIES
CHARSADDA

Muhammad Nauman
Dy. Director (A&A)
Khyber
Pakhtunkhwa
Peshawar
Directorate General Fisheries.

A (8/8) 13

TOUR PROGRAM OF MR. MUHAMMAD NAUMAN, DISTRICT OFFICER FISHERIES, CHARSADDA FOR THE MONTH OF 09/2022

DATE	FROM	TO	MODE OF JOURNEY	PURPOSE
02-09-2022	Charsadda	Peshawar & back to office	Govt. Vehicle	Discussed Official Matters with Director General Fisheries KP
05-09-2022	Charsadda	Tangl, Jindi area & back	do	Checked field staff activities against illegal fishing in Tangl and Kaniwar area
06-09-2022	Charsadda	Palay Dam, Abazai & back	do	Assessed Palay Dam situation, directed staff to control illegal fishing in Abazai area
08-09-2022	Charsadda	Peshawar & back to office	do	Discussed field matters with Director (HQ), Peshawar
12-09-2022	Charsadda	Nisatta and back	do	Visited area and monitored staff activities
13-09-2022	Charsadda	Palay Dam & back	do	Visited area and monitored staff activities
15-09-2022	Charsadda	Peshawar & back	do	Official meeting with Deputy Director (HQ)
19-09-2022	Charsadda	River Kabul & back	do	Visit River Kabul and River Swat, Checked illegal fishing with field Staff.
22-09-2022	Charsadda	Peshawar & back to office	do	Discussed Field related issues with Director General Fisheries KP.
23-09-2022	Charsadda	Nisatta and back	do	Visited area and monitored staff activities
26-09-2022	Charsadda	Shahqadar and back	do	Checked various sites alongside river Kabul and instructed staff to control illegal fishing
28-09-2022	Charsadda	Abazai and back to office	do	Visited area and monitored staff activities
30-09-2022	Charsadda	Peshawar & back to office	do	Discussed field Matters with Director (HQ).

No. 1296 / DOF (CHD)

Dated Charsadda the 12/10/2022

Submitted to Director General Fisheries Khyber Pakhtunkhwa Peshawar for favor of approval please.

Approved
 District Officer Fisheries
 Khyber Pakhtunkhwa
 Peshawar

[Signature]
 DISTRICT OFFICER FISHERIES
 CHARSADDA

Enter Cash Book
 P: No.

[Signature]
 Dy. Director (A&A)
 Khyber Pakhtunkhwa
 Peshawar
 Directorate General Fisheries



GOVERNMENT OF KHYBER PAKHTUNKHWA
LIVESTOCK, FISHERIES & COOPERATIVE
DEPARTMENT

Civil Secretariat Complex -II (Ex-FATA Sectt.), Warsak Road, Peshawar

(B)

(14)

Dated Peshawar the May 26, 2023

NOTIFICATION

NO.SO (E)LFC/2-4/2023: The posting/transfer of the following officers of Directorate General Fisheries Khyber Pakhtunkhwa are hereby ordered, in the public interest with immediate effect: -

S.No	Name & Designation of the officers	From	To
1	Muhammad Nauman, Assistant Director Fisheries, (BS-17)	Office of Assistant Director Fisheries, Mardan	Office of Assistant Director Fisheries, Nowshera
2	Mr. Tanveer Shahzad, Assistant Director Fisheries (BS-17)	Office of Assistant Director Fisheries, Swabi	Office of Assistant Director Fisheries Mardan & entrusted lookafter charge of the post of Assistant Director Fisheries, Swabi.
3	Mr. Nasir Khan Assistant Director Fisheries (BS-17)	District Officer Fisheries, Mansehra	District Officer Fisheries, Haripur
4	Mr. Mulazim Hussain Assistant Research Officer (BS-16)	O/O Assistant Director Fisheries, D.I Khan	Against the vacant post of Assistant Director Fisheries (BS-17), South Waziristan on his own pay and scale.

SD/-
SECRETARY
LIVESTOCK, FISHERIES & COOP:
DEPARTMENT

Copy forwarded to the:-

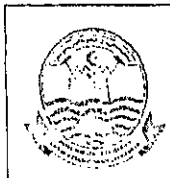
1. Accountant General, Khyber Pakhtunkhwa.
2. Director General Fisheries, Khyber Pakhtunkhwa, Peshawar.
3. District Account Officers, D.I Khan, Haripur, Mardan, Nowshera, Swabi & South Waziristan.
4. PS to Secretary Livestock, Fisheries & Cooperative Department.
5. Officers concerned.
6. Master File.

(Signature)
(Waqar Khan) 26.05.23
Section Officer (Estt.)

(Signature)

ATTESTED
to be true Copy

ATTESTED



www.fisheries.kp.gov.pk
**OFFICE OF THE DISTRICT OFFICER FISHERIES
MARDAN**

Carp Hatchery Charbanda, Mardan ☎ 0937-560040

No. 273-78 /DOF/M

Dated: 14/06/2023



RELINQUISH OF CHARGE

In pursuance of the secretary to the Government of Khyber Pakhtunkhwa Livestock, Fisheries and Cooperative department Notification No. SO (E) LFC/2-4/2023 dated 26-05-2023; I Muhammad Nauman, relinquish the charge of the office of the District Officer Fisheries Mardan on 14-06-2023 (AN).

~~_____~~

District Officer Fisheries
Mardan



Copy forwarded for information to:

1. PS to Secretary Livestock, Fisheries & Cooperative Department
2. The Director General Fisheries Khyber Pakhtunkhwa, Peshawar
3. The Deputy Commissioner Mardan
4. The District Comptroller of Accounts, Mardan
5. District Officer Fisheries Mardan (With Charge note and Pending bills detailed note attached please).

Nauman

[Signature]
District Officer Fisheries
Mardan

(D) (76)

	<p>www.fisheries.kp.gov.pk OFFICE OF THE DISTRICT OFFICER FISHERIES NOWSHERA</p> <p>No-2943-46 /DOF/</p>	
		Dated: 15/06/2023

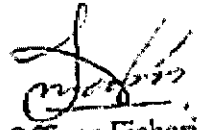
ASSUMPTION OF CHARGE



In pursuance of the secretary to the Government of Khyber Pakhtunkhwa Livestock, Fisheries and Cooperative department Notification No. SO (E) LFC/2-4/2023 dated 26-05-2023; I Muhammad Nauman, assumed the charge of the office of the District Officer Fisheries Nowshera on 15-06-2023 (FN).

District Officer Fisheries
Nowshera

Copy forwarded for information to:

1. PS to Secretary Livestock, Fisheries & Cooperative Department
2. The Director General Fisheries Khyber Pakhtunkhwa, Peshawar
3. The Deputy Commissioner Nowshera
4. The District Account officer Nowshera


District Officer Fisheries
Nowshera



GOVERNMENT OF KHYBER PAKHTUNKHWA
LIVESTOCK, FISHERIES & COOPERATIVE DEPARTMENT
Civil Secretariat Complex-II (Ex-FATA Sectt:), Warsak Road, Peshawar
Ph No. 091-9222752

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No.SO (E) LFC/2-4/ 2023/ 844
Dated Peshawar June 19th, 2023

To

✓
The Director General,
Fisheries, Khyber Pakhtunkhwa.

Subject:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION DATED 26.11.2023 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM THE POST OF ASSISTANT DIRECTOR FISHERIES (BS-17) DISTRICT MARDAN TO THE OFFICE OF ASSISTANT DIRECTOR NOWSHERA PRE-MATURELY AND IN VIOLATION OF THE TRANSFER/POSTING POLICY OF THE PROVINCIAL GOVT.

I am directed to refer to the subject noted above and to enclose herewith a copy of Departmental appeal dated 01.06.2023 addressed to Worthy Chief Secretary, Khyber Pakhtunkhwa by Muhammad Nauman, Assistant Director Fisheries (BS-17), District Mardan which is self-explanatory with the direction to submit comments to proceed further in the matter, please.

Encls: as above

Wasilla
(Waqar Khan) 19/6/23
Section Officer (Estt:)

Arif
Director (A&A)
Khyber
Pakhtunkhwa
Peshawar
Directorate General Fisheries

To,

The Worthy Chief Secretary,
Khyber Pakhtunkhwa, Peshawar.

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Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION DATED 26.11.2023 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM THE POST OF ASSISTANT DIRECTOR FISHERIES (BPS-17), DISTRICT MARDAN TO THE OFFICE OF ASSISTANT DIRECTOR FISHERIES, NOWSHERA PRE-MATURELY AND IN VIOLATION OF THE TRANSFER/POSTING POLICY OF THE PROVINCIAL GOVERNMENT

Secy, Livestock

Deputy Secretary
Chief Secretary

Respected Sir,

With great reverence it is stated that the appellant is the employee of Livestock, Fisheries & Cooperative Department and is serving as Assistant Director Fisheries, (BPS-17) at Mardan quite efficiently and upto the entire satisfaction of his superiors.

That the appellant while performing his duty as Assistant Director Fisheries (BPS-17) at Charsadda was transferred and posted at the Office of Assistant Director, Mardan vide Notification dated 30.11.2022. That in compliance of Notification dated 30.11.2022 the appellant took over the charge against his respective post at District Mardan and started performing his duty with devotion and with all zeal and zest.

That astonishingly the Worthy Secretary, Agriculture, Livestock, Fisheries & Cooperative Department, Khyber Pakhtunkhwa, Peshawar just after the lapse of hardly six months issued the impugned Notification dated 26.05.2023 whereby the appellant has been transferred from the Office of Assistant Director Livestock, Mardan to the Office of Assistant Director, Nowshera and posted his blue eyed person Mr. Tanveer Shehzad, Assistant Director Fisheries (BPS-17) in place of appellant.

That it is pertinent to mention that Mr. Tanveer Shehzad already completed his normal tenure at the Office of Assistant Director, Mardan with effect from 05.04.2021 to 30.11.2022. That vide Notification dated 30.11.2022 Mr. Tanveer Shehzad, Assistant Director Fisheries was transferred from Mardan to District Swabi and after the lapse of 6 months without completion of his normal tenure at District Swabi once again transferred and posted in District Mardan vide Notification dated 26.05.2023 in violation of law and rules ibid.

That the impugned Notification dated 26.05.2023 is based on mala fide intention of the authority concerned which has been just to accommodate his

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7/6/2023

Put up and
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Abdul
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That the impugned Notification dated 26.05.2023 has been in clear violation of Clause-I, IV and XIII of the transfer/posting policy of the Provincial Government which is not tenable and liable to be set aside to the extent of appellant and Mr. Tanveer Shehzad.

That the impugned Notification dated 26.05.2023 is also violative of Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.

That the appellant feeling aggrieved from the impugned Notification dated 26.05.2023 preferred the instant departmental appeal before your good self for redressal of the grievances of appellant.

It is, therefore, most humbly prayed that on acceptance of this departmental appeal the impugned Notification dated 26.05.2023 may very kindly be set aside to the extent of appellant and Mr. Tanveer Shehzad and the authority concerned be directed not to transfer the appellant from the Office of Assistant Director Fisheries (BPS-17), District Mardan till completion of his normal tenure. Any other relief which your good self deems fit that may also be awarded in favor of the appellant.

Dated: 01.06.2023.

Your sincerely

MUHAMMAD NAUMAN,

Assistant Director Fisheries (BPS-17),

District Mardan

Secretary FC

D. No. 1243

Dated 06-06-23

