

FORM OF ORDER SHEET

Court of _____

Appeal No. 743/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	31/05/2024	<p>The appeal of Mr. Muhammad Waseem presented today by Mr. Muhammad Arshad Khan Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 27.06.2024. Parcha Peshi given to the counsel for the appellant .</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

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

Service Appeal No. 743/2024

Muhammad Waseem Forester Khyber Pakhtunkhwa Forest School, Thai,
Abbottabad.

...APPELLANT

VERSUS

Chief Conservator of Forests Central southern Forest Region-I Khyber
Pakhtunkhwa Peshawar and others.

....RESPONDENTS

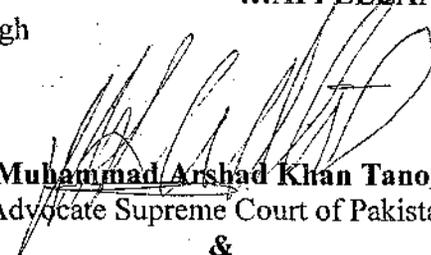
**SERVICE APPEAL
INDEX**

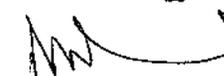
S. #	Description	Page #	Annexures
1.	Service appeal alongwith affidavit	1 to 11	
2.	Copy of appointment order dated 22/11/2017 of the appellant	12	"A"
3.	Copy of order of merger of seniority list dated 29/08/2023 and copy of order	13-14	"B" & "C"
4.	Copy of Khyber Pakhtunkhwa Appointment, Promotion and Transfer) Rules 1989	15-16	"D"
5.	Copy of seniority list of appellant maintained in the office of respondent No.4	17-20	"E"
6.	Copy of seniority list dated 31/10/2023	21-24	"F"
7.	Copy of departmental appeal dated 16/02/2024 and rejection order dated 02/05/2024	25-32	"G"
8.	Wakalatnama	33	

...APPELLANT

Dated: 25/5/2024

Through


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan


(Muhammad Ibrahim Khan)
Advocate High Court

1

BEFORE THE KP SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No. 743/2024

Muhammad Waseem Forester Khyber Pakhtunkhwa Forest School, Thai,
Abbottabad.

...APPELLANT

VERSUS

1. Chief Conservator of Forests Central southern Forest Region-I Khyber Pakhtunkhwa Peshawar.
2. Chief Conservator of Forests Southern Region -II Abbottabad.
3. Conservator of Forests Lower Hazara Forest Circle Abbottabad.
4. Principal Khyber Pakhtunkhwa Forest School Thai, Abbottabad.
5. Muhammad Alam son of Fazal Ahmad, Siran Forest Division, Mansehra.
6. Muhammad Nazir son of Ghulam Nabi, Siran Forest Division, Mansehra.
7. Muhammad Nazir, Haripur Forest Division Haripur.
8. Jahangir Shafqat Khan, Haripur Forest Division Haripur.
9. Muhammad Saddique, Siran Forest Division, Abbottabad.
10. Mr. Abdul Qayyum, Galis Forest Division, Abbottabad
11. Mr. Chanvez, Haripur Forest Division, Abbottabad
12. Mr. Mursaleen Akhtar, Haripur Forest Division, Abbottabad
13. Muhammad Zahoor, Haripur Forest Division, Abbottabad
14. Muhammad Nisar, Haripur Forest Division, Abbottabad
15. Muhammad Fiaz, Galis Forest Division, Abbottabad,
16. Muhammad Yousaf, Galis Forest Division, Abbottabad.
17. Ghulam Mujtaba Shah, Galis Forest Division, Abbottabad.
18. Mr. Wajid Hussain, Galis Forest Division, Abbottabad.
19. Azmat Hussain Shah, Kaghan Forest Division Mansehra.
20. Muhammad Riaz, Kaghan Forest Division Mansehra.
21. Mr. Liaqat Ali, Kaghan Forest Division Mansehra.
22. Mr. Khairullah, Kaghan Forest Division Mansehra.
23. Mr. Latif Hussain, Kaghan Forest Division Mansehra.
24. Muhammad Fareed-II, Kaghan Forest Division Mansehra.
25. Mr. Akhtar Zaman, Kaghan Forest Division Mansehra.
26. Muhammad Tariq, Galis Forest Division Abbottabad.
27. Mr. Bilal Ahmed, Galis Forest Division Abbottabad.

28. Muhammad Asif, Petrol Squad Division, Haripur.
29. Muhammad Khalid, Haripur Forest Division, Abbottabad.
30. Sajjad Hussain Shah, Haripur Forest Division, Haripur.
31. Mr. Waqar Ahmed, Kaghan Forest Division, Mansehra.
32. Mr. Chanzeb, Kaghan Forest Division, Mansehra.
33. Mr. Mahwali, Kaghan Forest Division, Mansehra.
34. Mr. Basharat Ali, Kaghan Forest Division, Mansehra.
35. Mr. Asif Khan, Galis Forest Division, Abbottabad.
36. Mr. Ghulam Murtaza, Galis Forest Division, Abbottabad.
37. Mr. Imdad Hussain Shah, Galis Forest Division, Abbottabad.
38. Mr. Sher Afzal, Petrol Squad Division, Abbottabad.
39. Mr. Noman Shah, Petrol Squad Division, Abbottabad.
40. Mr. Shah Hussain, Petrol Squad Division, Abbottabad.
41. Mr. Zohaib Khan, Petrol Squad Division, Haripur.
42. Syed Ahsan Shah, Petrol Squad Division, Abbottabad.
43. Syed Tahir Hussain Shah, Petrol Squad Division, Abbottabad.
44. Muhammad Javed, Galis Forest Division, Abbottabad.
45. Muhammad Mumtaz, Galis Forest Division, Abbottabad.
46. Muhammad Pervaiz, Galis Forest Division, Abbottabad.
47. Muhammad Aftab Mehmood, Galis Forest Division, Abbottabad.
48. Muhammad Maqbool, Galis Forest Division, Abbottabad.
49. Mr. Akhtar Nawaz, Galis Forest Division, Abbottabad.
50. Mr. Zahid Hussain Shah, Galis Forest Division, Abbottabad.
51. Mr. Nafees-ur-Rehman, Kaghan Forest Division, Mansehra.
52. Mr. Abdur Rasheed, Kaghan Forest Division, Mansehra.
53. Mr. Amir-ur-Rehman, Kaghan Forest Division, Mansehra.
54. Syed Imdad Hussain Shah, Kaghan Forest Division, Mansehra.
55. Mr. Fiaz Ali Shah, Kaghan Forest Division, Mansehra.
56. Mr. Rafiullah, Kaghan Forest Division, Mansehra.
57. Mr. Iftikhar Hussain, Kaghan Forest Division, Mansehra.
58. Muhammad Farash, Kaghan Forest Division, Mansehra.
59. Muhammad Faisal, Kaghan Forest Division, Mansehra.
60. Mr. Shafique Hussain Shah, Kaghan Forest Division, Mansehra.
61. Mr. Rustam Khan, Siran Forest Division Mansehra.
62. Mr. Niaz Ahmed Shah, Siran Forest Division Mansehra.
63. Muhammad Mushtaq Ahmed son of Muhammad Janas, Siran Forest Division Mansehra.
64. Muhammad Ilyas, Siran Forest Division Abbottabad.
65. Muhammad Ghulab, Siran Forest Division Mansehra.
66. Muhammad Saddique son of Mehboob, Siran Forest Division Mansehra.
67. Muhammad Jamshaid, Haripur Forest Division, Abbottabad.
68. Sajjad Khan, Haripur Forest Division, Haripur.
69. Gul Hamid, Haripur Forest Division, Haripur.
70. Syed Sabir Hussain Shah, Haripur Forest Division, Abbottabad.
71. Rehm Nawaz Khan, Haripur Forest Division, Haripur.
72. Shoukat Khan, Haripur Forest Division, Abbottabad.
73. Muhammad Saeed, Haripur Forest Division, Abbottabad.
74. Muhammad Siddique, Haripur Forest Division, Abbottabad.

75. Muhammad Azam, Haripur Forest Division, Haripur,
76. Bashir Ahmed, Haripur Forest Division, Haripur,
77. Ayaz Ahmed, Haripur Forest Division, Haripur,
78. Shah Alam, Kaghan Forest Division, Mansehra.
79. Shahnawaz, Kaghan Forest Division, Mansehra.
80. Noor-ul-Arfeen, Kaghan Forest Division, Mansehra.
81. Muhammad Hanif, Kaghan Forest Division, Mansehra.
82. Muhammad Saleem, Kaghan Forest Division, Mansehra.
83. Ejaz Ahmed, Kaghan Forest Division, Mansehra.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 FOR DECLARATION TO THE EFFECT THAT THE APPELLANT GOT APPOINTMENT IN RESPONDENTS' DEPARTMENT AS FORESTER ON 22/11/2017 AND HIS PROMOTION TO THE NEXT HIGHER RANK OF DEPUTY RANGER BPS-12 IS DUE. AS A RESULT, THE RESPONDENTS' DEPARTMENT MERGED SENIORITY OF THE APPELLANT AS FORESTER WITH THE FORESTER OF LOWER HAZARA FOREST CIRCLE ABBOTTABAD UNDER THE CONTROL OF THE RESPONDENT NO. 3. THE APPELLANT HAS BEEN PLACED AT SERIAL NO. 94 INSTEAD OF SERIAL NO. 14 OF THE FINAL SENIORITY LIST DATED 31/10/2023, WHICH IS PERVERSE, DISCRIMINATORY, AGAINST THE LAW AS WELL AS SECTION 17 OF THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES 1989. THE SENIORITY OF FORESTER IS REQUIRED TO BE MAINTAINED FROM THE DATE

OF APPOINTMENT BUT WITHOUT LAWFUL JUSTIFICATION, THE APPELLANT HAS BEEN PLACED AT THE BOTTOM OF THE SENIORITY LIST WHICH IS LIABLE TO BE RECTIFIED/RECONCILED AND THEREAFTER ISSUE REVISED SENIORITY LIST AFTER PLACING HIM AT SNO. 13 AND PROMOTE THE APPELLANT ON HIS TURN AS DEPUTY RANGER BPS-12.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, IMPUGNED SENIORITY LIST DATED 31/10/2023 MAY GRACIOUSLY BE SET-ASIDE AND RESPONDENTS MAY BE DIRECTED TO ISSUE REVISED SENIORITY LIST AFTER PLACING THE APPELLANT AT SERIAL NO. 13 AND THEREAFTER PROMOTE THE APPELLANT TO THE RANK OF DEPUTY RANGER ON HIS TURN. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEM APPROPRIATE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth;-

1. That the appellant got appointment as Forester on 22/11/2017 in KP Forest School Thai Abbottabad and he is serving in the department smoothly to run the show from the date of his appointment to till date. Copy of appointment order dated

22/11/2017 of the appellant is annexed as Annexure "A".

2. That basically, the appellant is the employee of respondent No.4 but there is /was no service structure for promotion for the appellant in the next rank/designation therefore, as a last resort, seniority of the appellant has been merged with the Foresters of respondent No. 3. Copy of order of merger of seniority list dated 29/08/2023 is annexed as Annexure "B" and copy of order is annexed as Annexure "C".
3. That seniority, on merger, is fixed from the date of appointment as per Section 17 of Khyber Pakhtunkhwa Appointment, Promotion and Transfer) Rules 1989. Copy of Khyber Pakhtunkhwa Appointment, Promotion and Transfer) Rules 1989 is annexed as Annexure "D".
4. That as per seniority list in Khyber Pakhtunkhwa Forest School Thai Abbottabad, the appellant is placed at Serial No. 3. Copy of seniority list of appellant maintained in the office of respondent No.4 is annexed as Annexure "E".

5. That the respondents' department instead of issuing tentative seniority list directly issued final seniority list after the merger of seniority list with foresters of respondent No. 3 and placed the appellant at Serial No.94 in the final seniority list instead of placing him at Serial No. 14 vide impugned seniority list dated 31/10/2023. Copy of seniority list dated 31/10/2023 is annexed as Annexure "F".

6. That feeling aggrieved, the appellant filed Departmental Appeal to the concerned respondents' which has been rejected with the remarks that the seniority has rightly been fixed from the date of arrival in the Lower Hazara Forest Circle Abbottabad, instead of date of appointment of the Appellant vide rejection order dated 02/05/2024. Copy of departmental appeal dated 16/02/2024 and rejection order dated 02/05/2024 are annexed as Annexure "G". Hence, the service appeal of the appellant is being filed inter-alia on the following grounds:-

GROUND:

- a) That the appellant is still employee of respondents' department as Forester BPS-10 in the office of respondent No. 4 and his promotion is due to the next rank of Deputy Ranger BPS-12 Hence, seniority has been merged with the seniority of Lower Hazara Forest Circle Abbottabad (respondent No. 3) only for the purposes of promotion. Whenever, seniority is merged from one circle to another circle by the respondents' themselves, no employee shall be placed at the bottom of the seniority list. However, when the employee makes request from transfer from one circle to another circle for his personal reason in such eventuality employee shall lose his seniority. The act of respondents towards the appellant is perverse and the seniority list dated 31/10/2023 is liable to be set-aside.
- b) That the appellant is senior from respondents No.5 to 84 therefore, as a matter of right, the respondents' department is

supposed to reconcile/rectify the impugned seniority list and after placing the appellant at serial No.14 instead of serial No.94.

- c) That the respondents' department is trying to accommodate some other juniors employees to the appellant who are blue eyed and have bureaucratic influence in the respondents' department, good governance demands that the employees shall be treated in accordance with law and particularly service laws invagued.
- d) That the superior courts has held in so many cases that seniority is to be fixed according to order of merit assigned to the employee at the time of appointment and there is no concept of maintaining the seniority from the date of the taking over the charge of the post Hence, seniority is always fixed from the date of appointment according to order of merits and not from the date of taking over the charge of the post.

- e) That the respondents' department, sorry to say is not following the criteria prescribed in the law for fixing of seniority. It is further submitted that there is no concept of fixing of seniority at the bottom on merger in the seniority between employees of different circles.
- f) That it is the golden principle of law, that whatever is due to civil servant that must be allowed to him, but here in this case, seniority of the appellant is not fixed according to the law but respondents' department is fixing the seniority of the appellant on their own whims and wishes vide seniority list dated 31/10/2023 which is liable to be set-aside.
- g) That the matter relates to terms and condition of service. Hence, this Honourable Tribunal has jurisdiction to adjudicate the lis.
- h) That service appeal is within the period of limitation and this Honourable Court has jurisdiction to entertain the appeal of the

appellant under Article 212 of the constitution of Islamic Republic of Pakistan 1973.

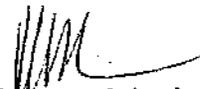
- i) That the other grounds shall be urged at the time of arguments.

It is therefore humbly prayed that on acceptance of the instant service appeal, impugned seniority list dated 31/10/2023 may graciously be set-aside and respondents may be directed to issue revised seniority list after placing the appellant at serial No. 14 and thereafter promote the appellant to the rank of deputy ranger on his turn. Any other relief which this Honourable Tribunal deem appropriate may also be granted to the appellant.


...APPELLANT

Dated: 25/3 /2024

Through

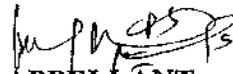

(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

&


(Muhammad Ibrahim Khan)
Advocate High Court

VERIFICATION:-

Verified on oath that the contents of foregoing service appeal are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable tribunal.


...APPELLANT

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

Service Appeal No. _____/2024

Muhammad Waseem Forester Khyber Pakhtunkhwa Forest School, Thai,
Abbottabad.

...APPELLANT

VERSUS

Chief Conservator of Forests Central southern Forest Region-I Khyber
Pakhtunkhwa Peshawar and others.

....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Muhammad Waseem Forester Khyber Pakhtunkhwa Forest School,
Thai, Abbottabad, do hereby solemnly affirm and declare that the contents
of foregoing service appeal are true and correct to the best of my knowledge
and belief and nothing has been concealed therein from this Honourable
Court.




DEPONENT

P-12

OFFICE ORDER NO. 55 DATED THAI, ABBOTTABAD THE 22 /11/2017 ISSUED BY MAZHAR IQBAL, PRINCIPAL, KHYBER PAKHTUNKHWA FOREST SCHOOL, THAI, ABBOTTABAD

Consequent upon the recommendation of Departmental Selection Committee constituted vide this office order No. 36 dated 29/09/2017, Mr. Muhammad Waseem S/O Mr. Muhammad Saleem, Resident of Mohallah Tauheed Abad, Pasala, PO Ayubia, Tehsil & District, Abbottabad is hereby appointed as Forester in BPS-09 (1:1770-730-33670) per month with usual allowances as admissible under the rules. The order will take effect from the date of arrival for duty.

His appointment is subject to the following terms and conditions:

i. His appointment as Forester is purely temporary and his services/employment is also purely temporary and such his services can be terminated in accordance with the Government of Khyber Pakhtunkhwa Establishment & Administration Department (Regulation Wing) Notification No. SO (O&M) E&AD/5-14/2013 dated 4.4.2013 at any time, irrespective of the fact that he is holding the charge of post other than that for which he is originally recruited.

ii. The appointee shall join duty at his own expenses within 15 days from the date of issue of this order. If the appointee fails to join the duty within 15 days after issuance of this order, his appointment will be considered as cancelled.

iii. The appointee shall remain on one-year probation period in accordance with section 6(2) of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule 15(i) of the Khyber Pakhtunkhwa Civil Servant (appointment, Promotion and Transfer) Rules 1989. If the appointee failed to complete the probation period un-successfully or any adverse remarks received from his superior officer then his services will be terminated without any further notice.

iv. In case the appointee wish to resign at any time, one month notice will be necessary or in lieu thereof one month pay will be forfeited.

v. He will be governed by such rules and orders relating to leave, travelling allowance, medical attendance, pay etc, or any other orders and rules issued by the Government for the category of Government servant to which he belongs.

vi. The appointment is subject to the production of health/medical certificate from Medical Superintendent District Headquarter Hospital, Abbottabad as well as production of his original testimonials.

vii. His appointment is subject to the production of a certificate of character from the principal, academic officer of the academic institution last attended and also certificates of character from two responsible persons, not being his relatives, who are well acquainted with his character and antecedents.

viii. His appointment is also subject to the provision of surety bond of worth Rs. 500,000/- (Five Hundred Thousand Rupees) to the effect that he will carry out continued five years service in the Khyber Pakhtunkhwa Forest School, Thai, Abbottabad.

ix. His appointment is further subject to the verification of his character and antecedents from Police Station concerned.

X. The appointee shall successfully complete two years mandatory training course from Khyber Pakhtunkhwa Forest School, Thai, Abbottabad.

(Mazhar Iqbal)
Principal,

Khyber Pakhtunkhwa Forest School
Thai, Abbottabad

No. 1104-8/GE dated Thai, Abbottabad the 22 /11/2017

Memorandum:

1. The Conservator, Lower Hazara Forest Circle, Abbottabad with reference to his office No. 2748-60/GE dated 28.9.2017 for information, please.
2. The Director, Institutional & Human Resource Development & Management, Peshawar for information, please.
3. Head Clerk/Accountant, KP Forest School, Thai, Abbottabad for information & necessary action.
4. Mr. Muhammad Waseem S/O Mr. Muhammad Saleem, Resident of Mohallah Tauheed Abad, Pasala, PO Ayubia, Tehsil & District, Abbottabad for information & necessary action.
5. Personal File for record.

Principal,

OFFICE ORDER NO. 38 DATED PESHAWAR THE 29 /08/2023 ISSUED BY
Sd/- MUQTADA SHAH, CHIEF CONSERVATOR OF FORESTS CENTRAL SOUTHERN
FOREST REGION-I, KHYBER PAKHTUNKHWA PESHAWAR

P-13

WHEREAS, the Khyber Pakhtunkhwa Forest School Thai Abbottabad was established in 1974 under the presidential Proclamation of 1958 resting absolute control over Forest School with Chief Conservator of Forests Khyber Pakhtunkhwa as per Para 11-1 of Chapter -XI of Forest Manual Vol-II.

Annex-B

AND WHEREAS, after abolition of one unit system, the School administration was placed under the administrative control of Conservator of Forest Hazara Forest Circle Abbottabad, now working as Conservator of Forests Lower Hazara Forest Circle Abbottabad. Consequent to promulgation of Provincial Forest Policy, 1999 and resultant Institutional of legal reform of the Forest Department, the School was placed under the control of I&HRD & M Directorate without any consideration for the career path/promotion of the four number foresters available in the school and neither a post of Deputy Ranger has been provided at the strength of School nor the Foresters employed in School were placed for the purpose of promotion to the post of Deputy Ranger against any other Forest Circle.

NOW THEREFORE, keeping in view the above ex-position and to provide career path to the Foresters appointed against sanctioned posts in Khyber Pakhtunkhwa Forest School, and exercising the power as Head of Attached Department, the seniority of the Foresters employed in Khyber Pakhtunkhwa Forest School Thai Abbottabad is hereby ordered to be placed & maintained with seniority of Foresters of Lower Hazara Forest Circle Abbottabad. Presently against 15 posts of Deputy Ranger in Lower Hazara Forest Circle Abbottabad, the number of forester post available are 110 that are for less in ratio compared to the other Forest Circles, hence this arrangement shall not be deemed to adversely affect the promotion opportunities of the staff of Lower Hazara Forest Circle.

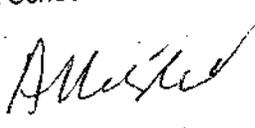
Sd/-
(Syed Muqtada Shah)
Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar

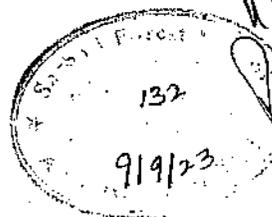
No. 1276-79 /E.

Copy forwarded to the:-

1. Chief Conservator of Forests Northern Region-II, Abbottabad
2. Director, I&HRD&M Peshawar
3. Conservator of Forests Lower Hazara Forest Circle Abbottabad
4. Principal Khyber Pakhtunkhwa Forest School Thai Abbottabad


Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar


Muhammad Arshad Khan
Assistant Conservator of Forests
Lower Hazara Forest Circle Abbottabad



Annex-C

Muhammad Yousaf Khan Conservator of Forests Lower Hazara Forest Circle Abbottabad		Civil Line Forest Offices Abbottabad ☎ 0992-9310232 FAX 0992-9310233 E-mail: cflhfc@gmail.com
No. 3788 /GE dated Abbottabad the 27.11.2023		

All Divisional Forest Officers
In Lower Hazara Forest Circle
Abbottabad (Including DFO Demarcation)

P-134

The Principal
Khyber Pakhtunkhwa
Forest School Thal Abbottabad

Subject: **FINAL SENIORITY LIST OF FORESTS AT IT STOOD ON 31.10.2023 IN RESPECT OF LOWER HAZARA FOREST CIRCLE ABBOTTABAD**

Memo

Enclosed please find herewith final seniority list of Forests as it stood on 31.10.2023 in respect of Lower Hazara Forest Circle Abbottabad for information and further necessary action and circulate the seniority list amongst all the Foresters.

Encl. As Above

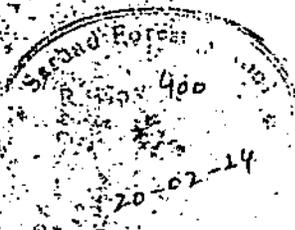
Conservator of Forests
Lower Hazara Forest Circle
Abbottabad

No. /GE

Copy alongwith copy of Seniority list forwarded to the Chief Conservator of Forests, Northern Forest Region-II Abbottabad for favour of information please.

Encl. As Above

Conservator of Forests
Lower Hazara Forest Circle
Abbottabad



EC
Inform all
Concerned
RPF 4
9/10/24

Attested

[Signature]

Thal School

Annex. C, D

ESTA CODE [Establishment Code Khyber Pakhtunkhwa] 27

(4) In case of extension of probation period, through specific order for another year, under sub-rule (2), the probation shall stand automatically terminated on the completion of extended period.]

16. Confirmation.---After satisfactory completion of the probationary period, a civil servant shall be confirmed; provided that he holds a substantive post; provided further that a civil servant shall not be deemed to have satisfactorily completed his period of probation, if he has failed to pass an examination, test or course or has failed to complete successfully a training prescribed within the meaning of sub-section (3) of Section 6 of the Khyber Pakhtunkhwa Civil Servants Act, 1973.

**PART-VI
SENIORITY**

17. Seniority.---(1) The seniority inter se of civil servants [appointed to a service, cadre or post] shall be determined.--

- (a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission² [or, as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and
- (b) in the case of civil servants appointed otherwise, with reference to the dates of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

Explanation-I.---If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher post, it would not adversely effect the interest of his seniors in fixation of his seniority in the higher post.

Explanation-II.---If a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incompleteness of record or for any other reason not attributing to his fault or demerit.

Explanation-III.---A junior person shall be deemed to have superseded a senior person only if both the junior and the senior persons were considered for the higher post and the junior person was appointed in preference to the senior person.

1. Substituted for the words "appointment to post in the same Basic Pay Scale in a cadre" by Notification No. SOR.I(S&GAD)4-1/80, dated 17-05-1989.
2. Inserted by Notification No. SOR.I(S&GAD)4-1/80(V.II), dated 04-02-1996.

(2) Seniority in various cadres of civil servants appointed by initial recruitment vis-a-viz those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre; provided that if two dates are the same, the person appointed otherwise shall rank senior to the person appointed by initial recruitment.

[(3) In the event of merger/restructuring of the departments, attached departments or subordinate Offices, the inter se seniority of civil servants affected by the merger / restructuring as aforesaid shall be determined in accordance with the date of their regular appointment to a cadre or post.]

18. **General Rules.**---In all matters not expressly provided for in these rules, civil servants shall be governed by such rules as have been or may hereafter be prescribed by Government and made applicable to them.

19. **Repeal.**---The Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, are hereby repealed.

Initial Appointment to Civil Posts (Relaxation of Upper Age Limit) Rules, 2008

[Gazette of Khyber Pakhtunkhwa, Extraordinary, Page No: 504-506, 15th March, 2008]

NO. SOE-III(E&AD)2-1/2007, Dated 01-03--2008.---In pursuance of the powers granted under Section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (N.-W.F.P Act XVIII of 1973), the competent authority is pleased to make the following rules, namely:

THE KHYBER PAKHTUNKHWA INITIAL APPOINTMENT TO CIVIL POSTS (RELAXATION OF UPPER AGE LIMIT RULES, 2008)

PART -- I GENERAL

1. (1) These rules may be called the Initial Appointment to Civil Posts (Relaxation of Upper Age Limit) Rules, 2008.
(2) These shall come into force with immediate effect.
2. (1) Nothing in these rules shall apply to the appointment in BS-17 and the posts of Civil Judge-Cum-Judicial Magistrate / Illaqa Qazi, BS-18 to be filled through the competitive examination of the Public Service Commission, in which case two years optimum relaxation shall be allowed to:

1. Added by Notification No. SOR-I(E&AD)4-1/80 (Vol. IV), dated 28-05-2002.
2. Rule 2 substituted by Notification No. SO-III(E&A)2-1/2007 dated 03-09-2008.

1. Rule:
2. Adder:

Attested
M. M. Khan
Secretary, Government of Khyber Pakhtunkhwa
Office No. 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

ANNEX-E

PRINCIPAL		KHYBER PAKHTUNKHWA FOREST SCHOOL THAI ABBOTTABAD
Murree Road, Thai, Abbottabad Phone No. (0992)410184, FAX No. (0992)410215 Email: kpfs.thai@gmail.com		
No. <u>291</u> /GE. Dated <u>25</u> /September, 2023.		

To,

P-17

The Conservator of Forests
Lower Hazara Forest Circle
Abbottabad

SUBJECT:-

SENIORITY LIST OF FORESTERS AS IT STOOD ON 31.12.2022

Memorandum;

Reference your good office letter No.1502/GE dated 07.09.2023.

Enclosed please find herewith Seniority List of Foresters, Khyber Pakhtunkhwa Forest School Thai Abbottabad on 31.12.2022 on the proper format, for favour of information and further necessary action, please.

Encl: As above.

No. 292-94 /GE


PRINCIPAL
KHYBER PAKHTUNKHWA
FOREST SCHOOL
THAI ABBOTTABAD

Copy forwarded to the:

- 1) Chief Conservator of Forests, Central Southern Forest Region-I Peshawar for favour of information, with reference to your good office order No.38 dated 29.08.2023, please.
- 2) Chief Conservator of Forests, Northern Forest Region-II Abbottabad for favour of information, with reference to CF Lower Hazara Forest Circle Abbottabad letter No.1503-05/GE dated 07.09.2023, please.
- 3) Director I&HRD Peshawar for favour of information, with reference to CF Lower Hazara Forest Circle Abbottabad letter No.1503-05/GE dated 07.09.2023, please.



Muhammad Aslam Khan
Advocate High Court


PRINCIPAL
KHYBER PAKHTUNKHWA
FOREST SCHOOL
THAI ABBOTTABAD

Annex-E P-18

SENIORITY LIST OF FORESTER OF KHYBER PAKHTUNKHWA FOREST SCHOOL, THAI, ABBOTTABAD AS IT STOOD ON 31-8-2023										
S. No.	Name OF FORESTER	Qualification	Home District	Division/ Circle	Any Test Passed	Date of Birth	Date of Appointment		Cadre	Remarks.
							Govt. Service	Present Grade		
1	Mr. Ghulam Mustafa	B.A	Mansehra	HT /Upper Hazara	42 nd F/Guard Course	15/06/1966	13/01/1991	01/02/2015	Forester	promoted as Forester vide CCF Peshawar office order No.105 dated 27-4-2011
2	Mr. Zeeshan Iqbal	B.E	Abbottabad	KP Forest School / Lower Hazara Circle	40 th Forester Course	15/03/1987	27/11/2017	27/11/2017	Forester	BPS-10
3	Mr. Muhammad Waseem	MSc	Abbottabad		40 th Forester Course	31/12/1994	24/05/2016	08/12/2017	Forester	BPS-10
4	Mr. Yasir Khan	DAE	Abbottabad		30 th Forester Course	13/03/1977	06/04/2005	11/03/2021	Forester	BPS-10

Attested

[Signature]
 35 Adjacent
 Abbottabad

[Signature]
 PRINCIPAL
 KHYBER PAKHTUNKHWA
 FOREST SCHOOL
 THAI ABBOTTABAD

P-19

PRINCIPAL



KHYBER PAKHTUNKHWA
FOREST SCHOOL THAI
ABBOTTABAD

Murree Road, Thai, Abbottabad Phone No. (0992)410184, FAX No. (0992)410215 Email: kpfs.thai@gmail.com

No. 1021 /GE,

Dated 19 /Nov, 2018.

four

Dispatch
Conserved
L.H.F.

To

The Conservator of Forests,
Lower Hazara Forest Circle,
Abbottabad.

SUBJECT:-

**TENTATIVE SENIORITY LIST OF FORESTERS IN RESPECT
OF LOWER HAZARA FOREST CIRCLE ABBOTTABAD AS IT
STOOD ON 30-11-2018.**

Memorandum:

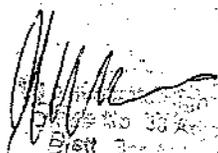
Reference your office letter No.4738-40/GE dated 12-11-2018.

As desired, the seniority list of Foresters working in this Institute on
prescribed format is enclosed herewith for favour of further necessary action in your office
please.

Encl: As above.


PRINCIPAL
KHYBER PAKHTUNKHWA
FOREST SCHOOL
THAI ABBOTTABAD

Alleshad


Page No 36
Dist

P 20

SENIORITY LIST OF FORESTER OF KHYBER PAKHTUNKHWA FOREST SCHOOL, THAI, ABBOTTABAD AS IT STOOD ON 30-11-2018.

S.No.	Name OF FORESTER	Qualification	Home District	Any Test Passed	Date of Birth	Date of Appointment		Cadre	Remarks
						Govt. Service	Present Grade		
1	Mr. Mahmood	Matric	Abbottabad	Trained	1/1/1960	13/7/1980	2/12/2015	Forester	BPS-10
2	Mr. Ghulam Mustafa	B.A	Mansehra	Un-Trained	15/6/1966	13/1/1991	2/12/2015	Forester	BPS-10
3	Mr. Zeeshan Iqbal	BSC (Eng)	Abbottabad	Under Training	15/3/1987	27/11/2017	27/11/2017	Forester	BPS-09
4	Mr. Muhammad Waseem	B.Sc	Abbottabad	Under Training	31/12/1994	24/5/2016	6/12/2017	Forester	BPS-09

Muhammad

Muhammad

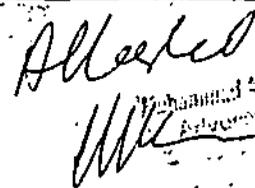
PRINCIPAL
KHYBER PAKHTUNKHWA
FOREST SCHOOL
THAI, ABBOTTABAD

Annex-F P-21

(E)

FINAL SENIORITY LIST OF FORESTERS IN RESPECT OF LOWER HAZARA FOREST CIRCLE ABBOTTABAD AS IT STOOD ON 31.10.2023

#	Name of Forester	Qualification	Home District	Any test Passed	Date of Birth	Date of Appointment In		Code	Remarks
						Govt. Service	Present grade		
1	2	3	4	5	6	7	8	9	10
1	Mr. Ishdaq Ahmad	Matric	Mansehra	Un-trained	04-04-1970	27-04-1988	06.03.2015	Siran Forest Division	Seniority restored vide CF, LHFC Abbottabad office order No. 61 dated 06.06.2023
2	Muhammad Itaf	Matric	Mansehra	Un-trained	01-03-1967	09-12-1989	06-03-2015	Siran Forest Division	Seniority restored vide CF, LHFC Abbottabad office order No. 49, dated 21-03-2023
3	Mr. Zafeer Ahmad	B.A	Mansehra	Un-trained	01-10-1971	12-12-1989	06-03-2015	Siran Forest Division	Seniority restored vide CF, LHFC Abbottabad office order No. 48, dated 21-03-2023
4	Muhammad Tasleem	Matric	Mansehra	Un-trained	01-02-1968	22-01-1990 28-02-1990	06-03-2015	Siran Forest Division	Seniority restored vide CF, LHFC Abbottabad office order No. 48, dated 21-03-2023
5	Mr. Tahir Ayub S/O Muhammad Ayub	F.A	Mansehra	Un-trained	01-06-1970	15-07-1990 17-01-1993	06-03-2015	Siran Forest Division	Seniority restored vide CF, LHFC Abbottabad office order No. 26, dated 06-12-2022
6	Muhammad Haroon	Matric	Abbottabad	Un-trained	20-04-1970	13-09-1991 09-09-1996	06.03.2015	Siran Forest Division	Seniority restored vide CF, LHFC Abbottabad office order No. 61 dated 06.06.2023
7	Mr. Sajjad Ahmad	Matric	Mansehra	Un-trained	20-03-1970	27-01-1990 19-11-1996	06.03.2015	Siran Forest Division	Seniority restored vide CF, LHFC Abbottabad office order No. 58 dated 25.03.2023
8	Syed Ejaz Hussain Shah	Matric	Mansehra	Un-trained	01-03-1972	01-09-1992 13-01-1999	06.03.2015	Siran Forest Division	Seniority restored vide CF, LHFC Abbottabad office order No. 61 dated 06.06.2023
9	Mr. Jawad Ahmed Masroor	B.S Honors	Mansehra	Trained	07-04-1985	01-02-2016	01-02-2016	Demarcation Division	-
10	Syed Tauqeer Ahmed Shah	BCS /MA	Haripur	Un-trained	17-12-1980	08-03-2016	08-03-2016	Haripur Forest Division	-
11	Mr. Shahid Hussain Shah	B.A	Haripur	Trained	03-04-1984	08-03-2016	08-03-2016	Haripur Forest Division	-
12	Mr. Umer Shah S/O Bahadar Shah	B.S Honors	Haripur	Un-trained	08-10-1989	03-02-2017	03-02-2017	Haripur Forest Division	-
13	Muhammad Alam S/O Fazal Ahmad	Matric	Mansehra	Un-trained	03.07.1968	17.08.1987 06-04-2000	04.12.2017	Siran Forest Division	-
14	Muhammad Nazir S/O Ghulam Nabi	Matric	Mansehra	Un-trained	01.05.1967	10.10.1987 14-05-2002	04.12.2017	Siran Forest Division	-
15	Muhammad Nazir	Matric	Haripur	Un-trained	20.06.1966	03.10.1984	20.03.2018	Haripur Forest Division	-
16	Jahangir Shafiqat Khan	MBA	Haripur	Trained	02-02-1990	01-01-2019	01-01-2019	Haripur Forest Division	-
17	Muhammad Siddique	Matric	Abbottabad	Un-trained	01-04-1965	02-12-1985 20-02-2010	06-03-2019	Siran Forest Division	-
18	Mr. Abdul Qayyum	Matric	Abbottabad	Un-trained	01-08-1964	01-10-1983	02-05-2019	Galls Forest Division	-
19	Mr. Charvez	Matric	Abbottabad	Un-trained	01-01-1966	24-02-1988	18-09-2019	Haripur Forest Division	-
20	Mr. Mursaleen Akhtar	Matric	Abbottabad	Un-trained	13.05.1965	20.10.1988	21.07.2020	Haripur Forest Division	-
21	Muhammad Zahoor	Matric	Abbottabad	Un-trained	01.01.1970	20.10.1988	21.07.2020	Haripur Forest Division	-
22	Muhammad Hissar	Matric	Abbottabad	Un-trained	23.04.1968	22.10.1988	21.07.2020	Haripur Forest Division	-
23	Muhammad Riaz	Matric	Abbottabad	Un-trained	20.03.1965	15.11.1987	06.08.2020	Galls Forest Division	-


 Muhammad Arshad Khan Tanoli
 Assistant Commr.

P-22

	3	4	5	6	7	8	9	10
				15.10.1968	16.02.1987	06.08.2020	Galls Forest Division	--
	Matric	Abbottabad	Un-trained	02.02.1968	10.04.1988	06.08.2020	Galls Forest Division	--
25	D.Com.	Abbottabad	Un-trained	01-02-1969	12-04-1988	02-03-2021	Galls Forest Division	--
26	F.A	Abbottabad	Un-trained	15-03-1966	13-11-1984	16-04-2021	Kaghan Forest Division	--
27	Matric	Manshra	Un-trained	06-06-1967	13-11-1984	16-04-2021	Kaghan Forest Division	--
28	BA	Manshra	Un-trained	12-04-1966	22-11-1984	16-04-2021	Kaghan Forest Division	--
29	FA	Manshra	Un-trained	02-03-1967	24-11-1984	16-04-2021	Kaghan Forest Division	--
30	F.A	Manshra	Un-trained	13-07-1964	05-12-1985	15-04-2021	Kaghan Forest Division	--
31	F.A	Manshra	Un-trained	19-12-1965	14-10-1986	16-04-2021	Kaghan Forest Division	--
32	Matric	Manshra	Un-trained	14-04-1966	10-10-1986	16-04-2021	Kaghan Forest Division	--
33	Matric	Manshra	Un-trained	25-12-1967	28-07-1988	03-05-2021	Galls Forest Division	--
34	Matric	Abbottabad	Un-trained	17-06-1994	04-05-2021	04-05-2021	Galls Forest Division	--
35	BSA	Abbottabad	Un-trained	04.04.1971	19.11.1989	16.07.2021	Patrol Squad Division	--
36	Matric	Haripur	Un-trained	12.02.1967	21.06.1990	17.06.2021	Haripur Forest Division	--
37	Matric	Abbottabad	Un-trained	19.03.1969	02.05.1992	17.06.2021	Haripur Forest Division	--
38	Matric	Haripur	Un-trained	20.03.1969	14.10.1986	23.09.2021	Kaghan Forest Division	--
39	Matric	Manshra	Un-trained	01.01.1965	22.10.1986	28.09.2021	Kaghan Forest Division	--
40	B.A	Manshra	Un-trained	29-04-1955	08-02-1987	28-09-2021	Kaghan Forest Division	--
41	Matric	Manshra	Un-trained	28-03-1969	05-10-1988	28-09-2021	Kaghan Forest Division	--
42	F.A	Manshra	Un-trained	20-03-1969	28-07-1988	02-02-2022	Galls Forest Division	--
43	B.A	Abbottabad	Un-trained	05-03-1969	12-07-1989	01-02-2022	Galls Forest Division	--
44	Matric	Abbottabad	Un-trained	07-05-1956	12-07-1984	02-02-2022	Galls Forest Division	Transfer from Saka Nuhah to Galls Forest Division and reported arrival on 24-12-1989 in Galls Forest Division
45	Matric	Abbottabad	Un-trained		24-11-1989		Galls Forest Division	
46	Matric	Abbottabad	Un-trained	04-03-1953	24-03-2007	29-01-2022	Patrol Squad Division	--
47	F.Sc	Abbottabad	Un-trained	19-12-1989	16-13-2015	28-02-2022	Patrol Squad Division	--
48	S.Com	Abbottabad	Un-trained	21-03-1997	17-12-2015	28-02-2022	Patrol Squad Division	--
49	B.A	Haripur	Un-trained	17.01.1995	30.12.2016	18.07.2022	Patrol Squad Division	--
50	DAE	Abbottabad	Un-trained	19.03.1992	08.05.2013	18.07.2022	Patrol Squad Division	--
51	BA	Abbottabad	Un-trained	30.06.1988	08.11.2016	18.07.2022	Patrol Squad Division	--
52	Matric	Abbottabad	Un-trained	01-03-1970	21-05-1990	19-07-2022	Galls Forest Division	--
53	Matric	Abbottabad	Un-trained	16-11-1957	12-02-1957	19-07-2022	Galls Forest Division	Transfer from Saka Nuhah to Galls Forest Division and reported arrival on 13-05-1990 in Galls Forest Division
54	Matric	Abbottabad	Un-trained	15-04-1967	22-10-1990	19-07-2022	Galls Forest Division	--
55	F.A	Abbottabad	Un-trained	13-03-1969	22-10-1990	19-07-2022	Galls Forest Division	--
56	Matric	Abbottabad	Un-trained	01-02-1969	29-09-1991	19-07-2022	Galls Forest Division	--
57	Matric	Abbottabad	Un-trained	03-07-1974	04-08-1992	19-07-2022	Galls Forest Division	--
58	Matric	Abbottabad	Un-trained	05-02-1971	13-10-1993	19-07-2022	Galls Forest Division	--

Allesha
 Advocate for the forest

Handwritten signature

P-24

	3	4	5	6	7	8	9	10
Mr. Ghulam Mustafa	BA	Mansehra	Un-trained	15.06.1966	13.01.1991	01.02.2015	KPK Forest School That	Transfer to Lower Hazara Forest Circle for maintaining their seniority vide CCF-I Office order No. 38 dated 29.08.2023 and reported arrival on 21.11.2023
93 Mr. Zeeshan Iqbal	BA	Abbottabad	Trained	15.03.1987	27.11.2017	27.11.2017	-do-	-do-
94 Muhammad Waseem	MSC	Abbottabad	Trained	31.12.1994	24.05.2016	06.12.2017	-do-	-do-
97 Mr. Yousaf Khan	DAE	Abbottabad	Trained	13.03.1977	01.04.2015	11.03.2021	-do-	-do-

Conservator of Forests
Lower Hazara Forest Circle
Abbottabad

Attested

Mohammad Yousaf Khan Tanoli
Deputy Forest Officer
Abbottabad

PRINCIPAL		KHYBER PAKHTUNKHWA FOREST SCHOOL THAI ABBOTTABAD
Murree Road, Thai, Abbottabad Phone No: (0992)410184, FAX No. (0992)410215 Email: kpfs.thai@gmail.com		
No. 798 /GE,	Dated 16 Feb 2024.	

To
The Chief Conservator of Forests,
Northern Forest Region-II
Abbottabad

Annex-G

Subject:-
APPEAL FOR CORRECTION OF SENIORITY LIST OF FORESTERS OF LOWER HAZARA FOREST CIRCLE

P-25

Memorandum: Reference Conservator of Forests, Lower Hazara Forest Circle, Abbottabad letter No. 3788/GE, dated 27-12-2023.

Enclosed please find herewith a combined application dated 16-2-2024 along with annexures preferred by M/S Zeeshan Iqbal & Muhammad Waseem, Foresters, Khyber Pakhtunkhwa Forest School Thai Abbottabad, which is self explanatory for favour of information and further necessary action at your end please.

Encl: As above.

PRINCIPAL
KHYBER PAKHTUNKHWA
FOREST SCHOOL
THAI ABBOTTABAD

No. 799-800 /GE,

Copy along with its enclosure forwarded for favour of information forwarded to the:-

- 1- Director, I&HRD&M, Directorate, Peshawar.
- 2- Conservator of Forests, Lower Hazara Forest Circle, Abbottabad, with reference to his office letter cited above please.

PRINCIPAL
KHYBER PAKHTUNKHWA
FOREST SCHOOL
THAI ABBOTTABAD

Seen

PKPFS

Received

Received CCF-II letter
No. 798/E of CF Lower Hazara
No. 799-800/E dated 16 Feb 2024

By hand Zeeshan
Sb. P. 16/02/24

Allected

Annex G

خدمت جناب چیف کنزرویٹر آف فارسٹ ناردرن ریجن-II ایبٹ آباد

پر سہیل خیر پختوخواہ فارسٹ سکول شمالی ایبٹ آباد

بوساطت:

P-26

اجل برائے درجہ سنیاری لسٹ آف فارسٹ لوئر ہزارہ سرکل ایبٹ آباد مورخہ 30/10/2023

عنوان:

جناب عالی!

موردیہ گزارشات ذیل ہیں:-

- مندرجہ بالا فائل سنیاری لسٹ کی کاپی بحوالہ کنزرویٹر آف فارسٹ لوئر ہزارہ فارسٹ سرکل ایبٹ آباد لٹر نمبر GE/3788 مورخہ 27/12/2023 تمام DFO صاحبان نیز پر سہیل خیر پختوخواہ فارسٹ سکول شمالی ایبٹ آباد کیلئے جاری ہوئی لیکن مطلوبہ تاریخ کے ایک ماہ اور 14 دن گزرنے کے بعد مورخہ 09/02/2024 کو پر سہیل آفس خیر پختوخواہ فارسٹ سکول جو کہ ایبٹ آباد ہی میں ہے منوصول ہوئی۔
- مندرجہ بالا سنیاری لسٹ جاری ہونے کی تاریخ سے فائل تصور کی گئی حالانکہ بمطابق سیکشن 8(1) خیر پختوخواہ سول سروس ایکٹ 1973 رولز 17 سول سروس (بھرتی، ترقی و تبادلہ) رولز 1989 سنیاری لسٹ کو ایک ماہ کیلئے عارضی یعنی Tentative جاری ہونے کے بعد اسے تمام متعلقہ ملازمین کو کاپی ارسال کی جاتی ہے اعتراضات کی صورت میں تمام متعلقہ ملازمین کو ایک ماہ کا وقت دیئے جانے کے بعد فائل سنیاری لسٹ جاری کی جاتی ہے۔ لیکن اس پر کوئی عمل نہیں ہوا۔
- بحوالہ چیف کنزرویٹر آف فارسٹ سنٹرل سدرن فارسٹ ریجن-1 پشاور آفس آرڈر نمبر 38 مورخہ 29/08/2023 (کاپی A لف حذا ہے) کے تحت حکم صادر فرمایا گیا کہ مندرجہ ذیل فارسٹران کو لوئر ہزارہ فارسٹ سرکل ایبٹ آباد میں سنیاری دی جائے۔ ہماری بھرتی بطور فارسٹ بحوالہ پر سہیل خیر پختوخواہ فارسٹ سکول شمالی ایبٹ آباد آفس آرڈر نمبر 55 اور آفس آرڈر نمبر 56 مورخہ 22/11/2017 کو ہوئی (کاپی B, C لف حذا ہے) لیکن ہمیں مندرجہ بالا سنیاری لسٹ میں مورخہ 21/11/2023 سے تصور کیا گیا جس بنا پر ہم سے بعد میں تمام بھرتی اور ترقی پانے والے فارسٹران کو Senior قرار دیا گیا حالانکہ ہماری سنیاری تاریخ بھرتی بطور فارسٹران 27/11/2017 اور 06/12/2017 ہونی چاہئے تھی۔ بھرتی کو ایشیاد کنزرویٹر آف فارسٹ لوئر ہزارہ فارسٹ سرکل ایبٹ آباد کے نام سے اخذ میں جاری کیا گیا تھا (کاپی D لف حذا ہے)۔
- سنیاری لسٹ کے ریویو کے کالم میں Date of Arrival اور ٹرانسفر کا ذکر کیا گیا ہے حالانکہ ہماری بحوالہ چیف کنزرویٹر آف فارسٹ سنٹرل سدرن فارسٹ ریجن-1 پشاور آفس آرڈر نمبر 38 مورخہ 29/08/2023 میں ٹرانسفر نہیں ہوئی بلکہ سنیاری کے متعلق لکھا گیا ہے۔
- کالم نمبر 8 (Date of Present Grade) میں ہماری تاریخ مورخہ 27/11/2017 اور 06/12/2017 درج کی گئی ہے اور ہم سے بعد میں بھرتی اور ترقی پانے والے فارسٹران کو Senior قرار دیا گیا ہے جو کہ متعلقہ رولز 17، 1989-APT کی نئی ہے فائل سنیاری لسٹ (کاپی E لف حذا ہے)۔

سہیل

Office No. 33, Government
District, Abbottabad

P-27

Appointment letter کے مطابق جاری سنیارٹی لسٹ میں 13 ویں سیریل نمبر پر (ڈیپان اقبال) اور 16 ویں سیریل نمبر پر (محمد نسیم) آئے

۱۱

لہذا آپ سے گزارش کی جاتی ہے کہ مندرجہ بالا سنیارٹی لسٹ کو درجگی کا آرڈر فرمایا جائے اور ہمیں بھرتی کے دن سے سنیارٹی دی

جائے، تفصیل ذیل ہے۔

#	Name of Forester	Qualification	Home District	Any Test Passed	Date of Birth	Date of Appointment		Cadre
						Govt. Service	Present Grade	
1	2	3	4	5	6	7	8	9
93	Mr. Zeeshao Iqbal	BE	Abbottabad	Trained	15.03.1987	27.11.2017	27.11.2017	KPK Forest School Thal
94	Muhammad Waseem	MSC	Abbottabad	Trained	31.12.1994	24.05.2016	06.12.2017	KPK Forest School Thal

آپ کی مین نوڈرز ہوگی۔

العارض

16/02/2024
ڈیپان اقبال فار سٹریٹریجی پختونخواہ فارسٹ سکول تھالی ایسٹ آباد

محمد نسیم فار سٹریجی پختونخواہ فارسٹ سکول تھالی ایسٹ آباد

تاریخ: 16/02/2024

Attested
16/02/2024

MUHAMMAD YOUSAF KHAN

Conservator of Forests
Lower Hazara Forest Circle
Abbottabad



☎ 0999-9910932
☎ 0999-9910233
✉ glowerhazaraforestcircle@gmail.com

The Principal,
Khyber Pakhtunkhwa Forest School,
M.A. Abbottabad.

No. 5817/GE Dated 02/15/2024

P-28

Subject: APPEAL FOR CORRECTION OF SENIORITY LIST OF FORESTERS OF LOWER HAZARA FOREST CIRCLE ABBOTTABAD.

Memo: Reference your letter No. 798-800/GE dated 16/02/2024 addressed to GSP NFR-II, Abbottabad copy endorsed to this office and others.

The Government of Khyber Pakhtunkhwa Environment Department Notification No SO (Estt) 1/281/11020-80 dated 8/10/2018 is broad enough laying down the principles that the Seniority of Foresters will be maintained on the basis of Parent Circle wherein the initial appointment has been made. (Copy enclosed for ready reference). Furthermore, the Administrative Department has also advised that out of Circle posting/transfer of Foresters/Forest Guards be avoided to turn down such problems and litigation vide letter No SO (Estt)/FE & WD/1-11/2018/3031-38 dated 8/8/2019 (photo copy enclosed)

In such circumstances, the seniority of appellants will ultimately go at the behest of the seniority list which has rightly been placed at their turn i.e from the date of arrival in Lower Hazara Circle instead of date of appointment.

In view of above circumstances, the appeal in hand can not be considered. Please inform the appellants accordingly.

Encl: As above

[Signature]
Conservator of Forests
Lower Hazara Forest Circle
Abbottabad

No. 5818-19/GE

Copy forwarded to the:-

- 1- Chief Conservator of Forests, NFR-II, Abbottabad for favour of information with reference to his letter No. 7240/A-10 dated 21/2/2024, please.
- 2- Director, Institutional & Human Resource Development and Management, Directorate Pestawar for information with reference to Principal, Khyber Pakhtunkhwa Forest School. That letter cited above.

[Signature]
Conservator of Forests
Lower Hazara Forest Circle
Abbottabad

[Signature]
Conservator of Forests
Lower Hazara Forest Circle
Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
 FORESTRY/ENVIRONMENT & WILDLIFE DEPARTMENT
 (NO. SO (EAW)/FEAWO/1-111/2018) O.A. = 30
 Dated Peshawar the 02nd August, 2018

Kayra

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P-29

- To
- 1) The Chief Conservator of Forests,
Central Southern Forest Region-I,
Khyber Pakhtunkhwa,
Peshawar.
 - 2) The Chief Conservator of Forests,
Northern Forest Region-II,
Civil Line Forest Offices,
Abbottabad.
 - 3) The Chief Conservator of Forests,
Malakand Forest Region-III,
Gaidu, Sharni, Swat.

Subject: **POSTING/TRANSFER OF FORESTERS/FOREST GUARDS/OTHERS
ACROSS REGIONS/CIRCLES/DIVISIONS**

I am directed to refer to the subject captioned above and to say that the post of Forest Guard is divisional cadre and as per the service rules, the post of Forest Guard is to be filled in among the bonafide residents/domicile holders of the areas/districts falling within the jurisdiction of the Forest Division in which the post falls vacant.

2) It has been observed that Forest Department issues posting/transfer orders of Foresters and Forest Guards etc from one Forest Circle/Forest Division to another Forest Circle/Forest Division. As a result, this department receives certain appeals from Foresters and Forest Guards through your respective offices and lower offices as well directly from the applicants regarding seniority disputes arising due to their transfers from one Forest Circle/Forest Division to another Forest Circle/Forest Division as they claim seniority from the date of their initial appointment. This practice is against the rules. This avoidable practice gives rise to litigation due to which organizational work suffers.

3) In view of above, it is advised that henceforth no Forester and Forest Guard etc shall be transferred from their initially appointed Forest Circle/Forest Division to other Forest Circle/Forest Division in order to avoid such issues and litigation.

4) It is, therefore, requested that the above instructions may be complied with in letter & spirit and also be circulated amongst lower formation/offices for strict compliance.

(HAfiz ABDUL JALIL)
SECTION OFFICER (ESTT)

Encls: No: & date even

Copy is forwarded to:-

- 1) All Conservators of Forests/Divisional Forest Officers in Forest Department. They are directed to ensure compliance of the above directions in letter & spirit.
- 2) PS to Secretary, FE&W department, Khyber Pakhtunkhwa.
- 3) PA to Additional Secretary, FE&W department, Khyber Pakhtunkhwa.
- 4) PA to Deputy Secretary-I, FE&W Department, Khyber Pakhtunkhwa.

SECTION OFFICER (ESTT)

Conservator of Forests
Lower Pisham Forest Circle
Abbottabad

P-30

0	0	0	0	0	0	0	0	0	0
5	8	0	0	0	0	0	0	0	0
5	8	1	0.495	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
6.568	50.377	2.483	12.945	0	0	0	0	0	0
70	164.5	36.675	62.929	0	0	0	0	0	0
1.333	3.631	1.227	1.227	0	0	0	0	0	0
0.119	0.923	0.146	0.296	0	0	0	0	0	0
37	6.476	32	1.647	0	0	0	0	0	0
0	637.14	0	154.171	0	0				37.32
		0							
		0							
		0							

M. Medici
M

Mohammed Abdul Wahid
Advocate High Court
Office No. 23 Adraoni
Distt. Bar Abotabad

M. Medici
Office No. 23 Adraoni
Distt. Bar Abotabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ENVIRONMENT DEPARTMENT

Dated Pesh. 5th Oct, 2012

P-31

(30)

NOTIFICATION

No. SO(Estt)Env/1-4/2k11/6475 In supersession of this department Notification No. SO(Estt)Env/1-4/2k11/6475 dated 2/1/2012, the Competent Authority, in exercise of the powers vested vide Item 3-B Part-I of defunct West Pakistan Manual Volume-II, is pleased to order reconstitution/revision of the following Circles for the purpose of initial appointment of Foresters and Deputy Rangers and promotion of Foresters to the rank of Deputy Rangers, in each circle, on the basis of circlewise seniority lists of the Foresters, with immediate effect.

#	Name of Circles constituted	Name of Circle
1.	Upper Hazara Circle	Upper Hazara Circle
2.	Lower Hazara Circle	Lower Hazara Circle
3.	Malakand West Circle	Malakand West Circle
4.	Malakand East Circle	Malakand East Circle
5.	FATA Circle	FATA Circle
6.	Southern Circle	Southern Circle
7.	Watershed Management Circle	Watershed Management Circle
8.	Forestry Planning & Monitoring Circle	Forestry Planning & Monitoring Circle

The seniority of the Foresters and Deputy Rangers shall be determined and fixed in the respective Circles on the basis of their initial appointment.

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
ENVIRONMENT DEPARTMENT

Endst. No. SO(Estt)Env/1-4/2k11

1629-50

Dated Pesh. 5th Oct, 2012

Copy is forwarded for information to:-

- 1) PS to Secretary, Environment Department.
- 2) Chief Conservator of Forests, Central & Southern Forest Region-I, Peshawar.
- 3) Chief Conservator of Forests, Northern Forest Region-II, Abbottabad.
- 4) Chief Conservator of Forests, Malakand Forest Region-III, Mungora at Saidu Sharif, Swat.
- 5) All Conservators of Forests, Khyber Pakhtunkhwa C/O. CCF-I, with the direction that tentative seniority lists of their respective circles may be issued by calling thereby objections within one month time period, if founding objection from any official(s), then final seniority lists may be issued accordingly.
- 6) All Directors Integrated Specialized Units, Forest Department.
- 7) Master file.
- 8) Officer order file.



No. 2071/15 dated Abbottabad the 16/10/2012

- Copy for information and immediate necessary action to the:
1. Conservator of Forests, Lower Hazara Forest Circle Abbottabad.
 2. Conservator of Forests, Upper Hazara Forest Circle Muzaffargarh.
 3. Conservator of Forests, Watershed Management Circle Abbottabad.

Please do the following:

- i. Circulate the above notification amongst all the DFOs of your respective circle.
- ii. Inform the concerned Foresters and direct them to withdraw their appeals, who have preferred appeals in various courts.
- iii. Prepare synopsis of all concerned for promotion.

LA: immediate

Adil Jaleel
Chief Conservator of Forests
Northern Forest Region-II Abbottabad
Khyber Pakhtunkhwa

Muzaffar
Conservator of Forests
Lower Hazara Forest Circle
Abbottabad

Abdullah
Director
Integrated Specialized Units
Forest Department

mal

P-32

Payable beyond 30/06/2025	
Completion date	Balance Period for completion after 30/06/22 (months)
1.7.2025	12 months
1.7.2025	12 months
0	0
0	0
0	0
0	0
0	0
0	0
13.2025	10 months
0	0
0	0
0	0
0	0
0	0
13.2025	10 months
13.2025	10 months
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Address: High Court
Office No. 38 Adjacent
Distt. Gar Abhattokh

کورٹ فیس

P. 33

وکالت نامہ

Y. Q. Service Tahsildar Peshawar

بہالت

کسٹم کنٹریبیوٹرز آف ٹرانس و غیرہ

عنوان: گلد و سب

Appellant

مخالفینہ

زوجیت مقدمہ سروس ایبل

باعث تحریر نمونہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے جبری و جواب دہی کی کارروائی منقطع آنکر نظام
می ادیت حد عالی کی طرف سے ایڈجسٹمنٹ - عیال بر وضع خان (بیگ وکیل

کوویل منتظر کر کے تقرر کرنا ہوں کہ صاحب کو مقدمہ میں کل کارروائی کا مکمل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راہی نامہ و تقرر ثالث و فیصلہ بر طرف دوسرے اقبال و دعویٰ اور بصورت دیگر ڈگری

کرا نے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے مہر ادا ہائی

بجائے تقرر کا اختیار رکھی ہوگا و صاحب مقرر شدہ کو بھی دعویٰ اور ویسے ہی اختیار رات ہوں گے اور اس کا

ساختہ پر داختہ محکمہ منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ ہر جانب التوائے مقدمہ کے سبب ہوگا اس کے

سستی کو مکمل صاحب ہوں گے۔ نیز تالیق رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دوم پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف اپنا ہوں گے کہ جبری و مقدمہ مذکور کریں اور اگر مختار مقرر کردہ ہیں

کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی جبری کے پابند نہ ہوں گے۔ نیز درخواست بہراد

استجارت تاش یعنی مفلسی کے دائرہ کرنے اور اس کی جبری کا بھی صاحب موصوف کا اختیار ہوگا۔

لہذا احکامت نامہ تحریر کیا تاکہ سند ہے۔

الرقوم: 25 - 5 - 26

بتام:

Acceptance

Muhammad Ibrahim Khan

MUHAMMAD IBRAHIM KHAN

Muhammad Arshad Khan

MUHAMMAD ARSHAD KHAN
A.S.C
Amoli