

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,  
PESHAWAR

SERVICE APPEAL No.....2285/2023

Salah Ud Din Ayubi S/o Jamal Ud Din R/o Peshawar University, Achini Payan,  
Tehsil & District Peshawar, Divisional Wildlife Officer Headquarters,  
Peshawar

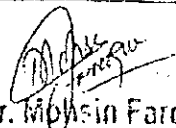
..... (Appellant)

Versus

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

INDEX

S. No.	Description of documents	Annex	Pages
1.	Para wise Comments	-	1-3
2.	Copy of Service Rules of the Deputy Conservator Wildlife/ Divisional Wildlife Officer (BPS-18), Sub Divisional Wildlife Officer (BPS-17) etc. on 08/10/2007	I	4-8
3.	Promotion Notification of officers on Acting Charge Basis dated 17/01/2018	II	9-10
4.	Promotion Notification of Officers on Regular Basis dated 13/07/2020	III	11-12
5.	Salary slip of Salah-Ud-Din Ayubi, DFO Wildlife for the month of 06/2020 for authenticating that the officer has received financial benefits of BPS-18 during his appointment on A.C. B	IV	13
6.	Final Seniority list of Deputy Conservator Wildlife/Divisional Wildlife Officer (BPS-18) as it stood on 30-06-2023	V	14-16
7.	Vetted Copy of Parawise comments	-	17-18
8.	Affidavit	-	19
9.	Authority Letter	-	20

  
(Dr. Mohsin Farooque)  
Chief Conservator Wildlife Deponent  
Khyber Pakhtunkhwa  
Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**SERVICE APPEAL NO.2285/2023**

Mr. Salah-Ud-Din Ayubi  
Divisional Forest Officer Wildlife Headquarter  
Peshawar ..... (Appellant)

**VERSUS**

1. Government of Khyber Pakhtunkhwa through  
Chief Secretary Khyber Pakhtunkhwa, Peshawar
2. The Secretary to Government of Khyber Pakhtunkhwa  
Climate Change, Forestry, Environment and  
Wildlife Department, Peshawar.
3. The Chief Conservator Wildlife,  
Khyber Pakhtunkhwa, Peshawar ..... (Respondents)

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS**

Respectfully Sheweth;

**PRELIMINARY OBJECTIONS**

1. The appeal is not maintainable in the present form.
2. The Appellant has no locus standi and cause of action to bring the present appeal.
3. The appeal is time barred and hit by limitations.
4. The appeal is non-maintainable for mis-joinder and non-joinder of proper parties.

**ON FACTS:**

1. No comments.
2. Correct to the extent that the appellant was appointed as Range Officer Wildlife (BPS-16) on 20/11/2008 upon recommendation of Khyber Pakhtunkhwa Public Service Commission. *Amir Raza*
3. Correct to the extent that the appellant applied afresh for the post of Sub-Divisional Wildlife Officer (BPS-17) and after going through fresh competition, he was recommended by the Khyber Pakhtunkhwa Public Service Commission as Sub-Divisional Wildlife Officer (BPS-17) and appointed on 03/10/2014 against the post of Sub Divisional Wildlife Officer falling to the initial recruitment quota.
4. In Correct. The appellant has concealed the facts from the Tribunal because the Method of Recruitment to the post of Divisional Wildlife Officer (BS-18) is "by promotion from amongst the holder of the post of Sub Divisional Wildlife Officer (BPS-17) on seniority-cum fitness having five years' Service as such & passing of departmental Examination". According to online

2

to its inherent nature, or when used after a noun it means considering a thing on its own, separately from other things / factor. Therefore, 05-Years Regular Service in BS-17 is must for promotion to BS-18 in *accord with existing Service Rules of Wildlife Department Khyber Pakhtunkhwa*. The Appellant mentioned the relevant portion of Promotion Policy 2008. However, Service Rules for a post framed on the recommendation of Standing Service Rules Committee (SSRC) are superior to the policy. Policy guidelines are issued by the Govt as a general procedure for all kind of promotions and length of service prescribed in the policy is applied when no specific length is mentioned in the Rules, as promotion is always made on existing Service Rules of the concerned Deptt: to specific post / vacancy subject to many other fitness parameters. (Copy of notification dated 08/10/2007 of Service Rules relating the post of Divisional Wildlife Officer is attached for ready reference **Annex-I**). Moreover, the appellant has already availed the Benefits of BS-18 w.e.f. 17/01/2018 on appointment on Acting Charge Basis according to Rule 9(1) of the APT Rules, 1989 (**Annex-II**) and when she completed 05 Years' Service in BS-17, then promoted on regular basis on 13/07/2020 vide notification No. SO(Estt)/FE&WD/II-8/2020 (**Annex-III**). ***It is noteworthy that service in lower grade (BS-16 & below) is countable towards length of service for promotion to BS-18 only if the holder of BS-16 post moves to BS-17 and BS-18 through promotion, whereas the appellant was selected to BS-17 as a fresh candidate by the Khyber Pakhtunkhwa Public Service Commission through competitive process.***

- Jamir Raza*
5. In-correct. As already explained in Para 4 above, the applicant has concealed the facts from the Tribunal.
  6. Incorrect. The appellant is misleading the Tribunal. The fact is that the appellant filed departmental appeal for alteration of Seniority List of the post of Deputy Conservator Wildlife/Divisional Wildlife Officer (BPS-18), however the appeal of the appellant was rejected by the competent authority **partially** as per prevailing rules with the condition that all financial benefits of previous service in BS-16 may be given to the applicant as per rules and policy. As confirmed from the Budget & Accounts Cell of this Department all previous financial benefits of BS-16 as well as financial benefit of appointment on Acting Charge Basis (A.C.B) in BS-18 have already been given to the appellant properly (**Annex-IV**). It is pointed out that as evident from Column 4 Sr. No. <sup>14</sup>~~13~~ of the Seniority List **20.11.2008** is reflected as date of 1<sup>st</sup> entry into Government Service and 13.07.2020 reflected as the date of appointment to the present post i.e. BS-18 (**Annex-V**). It is pointed out that length of service alone is not determining factor in determination of seniority in a cadre or service. In terms of Section-8(3) read with Rule-17(1) (a) and 17 (2), seniority, in case of initial appointment, is determined on the

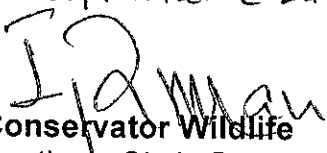
basics of merit assigned by the Khyber Pakhtunkhwa Public Service Commission and date of regular appointment. As pointed out at para-1 above, the appellant was appointed to BS-17 through initial recruitment by the Khyber Pakhtunkhwa Public Service Commission.

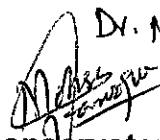
7. As already explained in paras 5 & 6, the appellant is not an aggrieved person and merely wasted the precious time of the Court/Tribunal as well as the Govt/Deptt. Therefore, the Instant Service Appeal may be dismissed straightaway with cost.

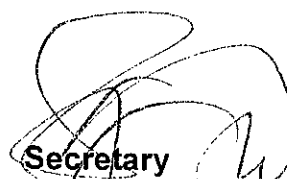
**ON GROUNDS**

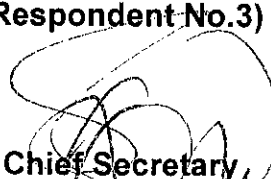
- A). Pertains to record, hence needs no comments.
- B). As already explained in Para 4, 5 & 6 of the facts.
- C). As already explained in Para 4, 5 & 6 of the facts.
- D). Incorrect, The appellant is misleading this Hon'ble Tribunal because her appeal was considered by the competent authority and rejected **partially** on grounds mentioned in para-6 of the facts.
- E). Incorrect, as already explained in para 4, 5 & 6 of the facts.
- F). Incorrect, no discrimination with appellant has been made by the department.
- G). Incorrect, as already explained in para 4, 5 & 6 of the facts.
- H). Incorrect. The appellant was appointed to BS-18 on Acting Charge Basis and then promoted as Deputy Conservator Wildlife/Divisional Wildlife Officer (BPS-18) on regular basis vide Notification dated 13/07/2020 in accordance with the rules and the policy.
- I). The respondents also seek leave to raise additional grounds at the time of arguments.

In view of the above exposition, it is most humbly prayed that the instant service appeal may kindly be dismissed with cost being devoid of merit as the appellant has been treated according to existing Service Rules & Policy of the Provincial Govt, please.

Iftikhar-e-zaman  
  
 Conservator Wildlife  
 Southern Circle Bannu  
 (Respondent No.4)

Dr. Mohsin Farooque  
  
 Chief Conservator Wildlife  
 Khyber Pakhtunkhwa  
 Peshawar  
 (Respondent No.3)

  
 Secretary  
 Government of Khyber Pakhtunkhwa  
 Climate Change, Forestry,  
 Environment and Wildlife Department  
 (Respondent No.2)

  
 Chief Secretary  
 Khyber Pakhtunkhwa  
 (Respondent No.1)

SYED NAZAR HUSSAIN SHAH (Respondent No.1 & 2)

EXTRA

GOVE



REGISTERED NO. P.III

G A Z E T T E

# KHYBER 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/I-465/88/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/institute.	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. <b>NOTE:</b> 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

Attested

Superintendent  
Wildlife Head Office  
Peshawar

		<p><b>Note:</b> Qualifications at S.No. ii &amp; iii will only be considered when no suitable candidate with the qualification at S.No. i 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>
4)	<p>Ranger Officer (BPS-16)</p>	<p>(i) B.Sc. in Wildlife Management/Wildlife Ecology/Wildlife Biology from a recognized University or institute with at least 2<sup>nd</sup> Division; or</p> <p>(ii) B.Sc Forestry from Pakistan Forest Institute, Peshawar in 2<sup>nd</sup> Division; or</p> <p>(iii) B.Sc from a recognized university in Zoology/ Botany as one of the subject in 2<sup>nd</sup> Division. <b>NOTE:</b> Qualifications at serial No. iii will only be considered when no suitable candidate with qualification at serial No. i and ii, is available.</p>	<p>(a) <b>Sixty-seven</b> 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) <b>Thirty-three</b> percent by initial recruitment.</p> <p><b>NOTE:</b> Appointment of candidates selected for the posts by the Public Service Commission shall be subject to the following conditions:- (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>

*Attested*

*[Signature]*

Superintendent  
Wildlife Head Office  
Peshawar

			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
--	--	--	--

*Attested*

*M. J. T.*  
 Superintendent  
 Wildlife Head Office  
 Peshawar

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

Printed and published by the Manager,  
 Staty. Ptg. Deptt., Khyber Pakhtunkhwa, Peshawar.

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

**NOTIFICATION.**

Peshawar dated the 10/02/2009

SO(FT:II)AD/I-465/88/Vol-IV, dated 26/01/1993, the Wildlife Department's Notification No. SO(FT:II)AD/I-465/88/Vol-IV, dated 26/01/1993, the following further amendments shall be made, namely:

**AMENDMENT**

In the Appendix, under the heading "WILDLIFE WING", in PART-I, PROFESSIONAL POSTS, :-

in Column 5, against S.No.2, after the words "Sub Divisional Wildlife Officers", the words "and Assistant Conservator Wildlife" shall be inserted; and

in Column 2, against S.No.3, for the words "Sub Divisional Wildlife Officer" the words "Sub Divisional Wildlife Officer/Assistant Conservator Wildlife" shall be substituted.

SECRETARY TO GOVT: OF NWFP  
ENVIRONMENT DEPARTMENT.

NO.SO(Estt)/Env/II-465/2K8: 3186-3221

Dated: 10/02/2009

Copy is forwarded for information to :-

- 1) All Administrative Secretaries, Govt: of NWFP.
- 2) Accountant General, NWFP.
- 3) All Heads of Attached Departments in NWFP.
- 4) Chief Conservator of Forests, NWFP.
- 5) Chief Conservator Wildlife NWFP.
- 6) All Conservators of Wildlife NWFP.
- 7) All District Coordination Officers in NWFP.
- 8) Registrar Peshawar High Court/Service Tribunal, NWFP.
- 9) Secretary, NWFP Public Service Commission.
- 10) All Executive District Officers Finance in NWFP.
- 11) Director Budget & Accounts Environment Department.
- 12) All District Accounts Officers in NWFP.
- 13) Librarian, Government of NWFP, Establishment Department.
- 14) Manager Government Printing Press, NWFP, Peshawar for publication in the Official Gazette with the request that twenty printed copies of the Notification, when published may be furnished to this department.
- 15) PS to Secretary Environment Department NWFP.
- 16) PA to Additional Secretary Environment Department.
- 17) PA to Deputy Secretary-I & II, Environment Department.
- 18) Master file.
- 19) Concerned file.

AHested

*Mutahir Shah*  
(MUTAHIR SHAH)  
SECTION OFFICER (ESTT.)

Scanned with CamScanner

*Mutahir Shah*  
Superintendent  
Wildlife Head Office  
Peshawar



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

**NOTIFICATION**

Peshawar dated the 10/02/2009

NO.SO (Estt)/Env/II-465/2K8:--- In pursuance of the provisions contained in sub-rule (2) of Government 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's Notification No. SO(FT:II)ADI-465/88/VOL-IV, dated. 26/01/1993 the following further amendments shall be made, namely:

**AMENDMENT**

In the appendix, under the heading "WILDLIFE WING". In Part-I,

**PROFESSIONAL POSTS:-**

**Divisional**

In Column 5, against S.No. 2, after the words " Sub

**Wildlife Officers", the words and Assistant Conservator Wildlife" shall be inserted; and**

In Column 2, against S.No. 3, for the words " **Sub Divisional Wildlife Officers", the words "Sub Divisional Wildlife Officer/ Assistant Conservator Wildlife" shall be substituted.**

**Secretary to Govt: of NWFP  
Environment Department.**

NO.SO (ESTT)/ENV/II-465/2K8:

Copy is forwarded for information to:-

*Assessed*

1. All administrative Secretaries, Govt. of NWFP.
2. Accountant General, NWFP.
3. All Head of Attached Departments in NWFP.
4. Chief Conservator of Forests, NWFP.
5. Chief Conservator of Wildlife, NWFP.
6. All Conservators of Wildlife, NWFP.
7. All District Coordination officers NWFP.
8. Registrar Peshawar High Court/ Service Tribunal, NWFP.
9. Secretary, NWFP Public Service Commission.
10. All Executive District Officers Finance in NWFP.
11. Director Budget & Accounts Environment Department.
12. All District Accounts Officers in NWFP.
13. Librarian, Government of NWFP, Establishment Department.
14. Manager Government Printing Press, NWFP, Peshawar for publication in the Official Gazette with the request that twenty printed copies of the notification, when published may be furnished to this department.
15. PS to Secretary Environment Department NWFP.
16. PA to Additional Secretary Environment Department.
17. PA to Deputy Secretary-I & II, Environment Department.
18. Master file.
19. Concerned file.

*M. Shah*  
**Superintendent  
Wildlife Head Office  
Peshawar**

**(MUTAHIR SHAH)  
SECTION OFFICER (ESTT).**

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT

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23/1/18

Dated Peshawar the, 17<sup>th</sup> January, 2018

**NOTIFICATION**

No.SO(Estt)FER/WD/1-8/2016: The Competent Authority, in consultation with the Provincial Selection Board, is pleased to appoint the following Sub Divisional Wildlife Officers (BPS-17) to the post of Divisional Wildlife Officers (BS-18), Wildlife Department, Khyber Pakhtunkhwa, on acting charge basis, with immediate effect:-

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

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. Aman Ullah, Divisional Wildlife Officers (BS-17)	On promotion	To continue as Divisional Wildlife Officer, Mardan Wildlife Division
2	Mr. Ejaz Ahmad, Divisional Wildlife Officers (BS-17)	On promotion	To continue as Divisional Wildlife Officer, Chitral Wildlife Division
3	Miss Haseena, Divisional Wildlife Officers (BS-17)	On promotion	Deputy Director/Divisional Wildlife Officer, Wildlife Peshawar Zoo
4	Mr. Salah ud Din Ayubi, Divisional Wildlife Officers (BS-17)	On promotion	Divisional Wildlife Officer, Chitral Gol National Park only for actualization of his promotion.
5	Muhammad Abdus Samad, Divisional Wildlife Officers (BS-17)	On promotion	To continue as Divisional Wildlife Officer, Kohat Wildlife Division
6	Muhammad Idress, Divisional Wildlife Officers (BS-17)	On promotion	To continue as Divisional Wildlife Officer, Buner Wildlife Division
7	Miss Maria Marjan	Lecturer in Forestry, Pakistan Forest Institute, Peshawar (In her own pay & scale)	Education Officer/Sub Divisional Wildlife Officer, Peshawar Zoo

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

Endst: No. SO (Estt) FER/WD/1-8/2016/702-66

Dated Pesh: 17<sup>th</sup> January, 2018

Copy is forwarded to:-

1. PSO to Chief Secretary, Khyber Pakhtunkhwa.
2. Chief Conservator Wildlife, Khyber Pakhtunkhwa.
3. Conservators Wildlife, Southern and Northern Circles, Peshawar/Swat.
4. Director Budget & Accounts Cell, Forestry, Environment & Wildlife Department.
5. PS to Secretary Forestry, Environment & Wildlife Department, Khyber Pakhtunkhwa.
6. Officers concerned.
7. Personal files of the officers.
8. Master file.
9. Office order file.

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(TARIQ JAMAL)  
SECTION OFFICER (ESTT)

Superintendent  
Wildlife Head Office  
Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA  
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT

**BETTER COPY**

**Dated Peshawar the, 17<sup>th</sup> January, 2018**

**NOTIFICATION:**

**No. So (Estt) FE&WD|1-8/2016:** The Competent Authority, in consultation with Provincial Selection Board, is pleased to appoint the following Sub Divisional Wildlife Officers (BPS-17) to the post of Divisional Wildlife officers (BS-18), Wildlife Department, Khyber Pakhtunkhwa, on acting charge basis, with immediate effect:

1.	Mr. Aman Ullah
2.	Mr. Ejaz Ahmed
3.	Miss Haeena
4.	Mr. Salah ud Din Ayubi
5.	Muhammad Abdus Samad
6.	Muhammad Idress

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 Officers/Designation/BS	From	To
1.	Mr. Aman Ullah Divisional Wildlife officers (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Mardan Wildlife Division
2.	Mr. Ejaz Ahmed Divisional Wildlife officers (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Chitral Wildlife Division
3.	Miss Haeena Divisional Wildlife officers (BS-18)	On promotion	Deputy Director/Divisional Wildlife Officer, Wildlife Peshawar Zoo
4.	Mr. Salah ud Din Ayubi Divisional Wildlife officers (BS-18)	On promotion	Divisional Wildlife Officer, Chitral Gol National Park only for actualization of his promotion
5.	Muhammad Abdus Samad Divisional Wildlife officers (BS-18)	On promotion	To Continue as Divisional Wildlife Officer, Kohat Wildlife Division
6.	Muhammad Idress Divisional Wildlife officers (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Buner Wildlife Division
7.	Miss Maria Marjan	Lecturer in Forestry, Pakistan Forest Institute, Peshawar (in her own pay scale)	Education Officer/Sub Divisional Wildlife officer, Peshawar Zoo.

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

**Endst: No. So (Estt) FE&WD|1-8/2016: /76266**

**Dated Peshawar: 17<sup>th</sup> January, 2018**

Copy is forwarded to: -

1. PSO to Chief Secretary, Khyber Pakhtunkhwa.
2. Chief Conservator Wildlife, Khyber Pakhtunkhwa.
3. Conservator Wildlife. Southern and Northern Circles, Peshawar/Swat.
4. Director Budget & Accounts Cell, Forestry, Environment & Wildlife Department.
5. PS to Secretary Forestry, Environment & Wildlife Department.
6. Officers concerned.
7. Personal files at the office.
8. Master file.
9. Office order file.

*Attested*

-SD-  
(Tariq Jamal)  
Section Officer (Estt)

*M. J. Khan*  
Superintendent  
Wildlife Head Office  
Peshawar

Annex-III

11

GOVERNMENT OF KHYBER PAKHTUNKHWA  
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT

Date: 13<sup>th</sup> July, 2020

**NOTIFICATION**

**No. SO (Estt) FE&WD/II-B/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
6	Muhammad Idrees, Divisional Wildlife Officers (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Chitral Wildlife Division

Attended

M. H. Khan

Joint Head of Office  
Peshawar

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

Endst: No. SO (Estt) FE&WD/II-B/2016

Dated Pesh: 13<sup>th</sup> July, 2020

Copy is 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.

Copy forwarded to  
all concerned  
for circulation  
21/7/20

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

No. 416-21 /WLDated Peshawar 22-07-2020.

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

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT**  
Dated Peshawar the 12<sup>th</sup>, July, 2020

12

**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 Officer (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	Mr. 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.

S#	NAME OF OFFICERS/ 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 Officer BS-18	On promotion	To continue as Divisional Wildlife Officer, Extension Wildlife Division
3	Mr. Salah Ud Din Ayubi, Divisional Wildlife Officer (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Abbottabad Wildlife Division
4	Muhammad Abdus Samad, Divisional Wildlife Officer (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Kohat Wildlife Division
5	Mr. Niamat Ullah, Divisional Wildlife Officer (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Chitral Gol National Park
6	Muhammad Idrees, Divisional Wildlife Officer (BS-18)	On promotion	To continue as Divisional Wildlife Officer, Chitral Wildlife Division

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

Endst: No. SO (Estt) FE&amp;WD/II-8/2016

dated Pesh: 13<sup>th</sup> July 2020**Copy is 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 Parks 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

*AHesteed*

(Zia- Ur- Rehman)  
Section Officer (ESTT)

*Muhammad*  
**Superintendent**  
**Wildlife Head Office**  
**Peshawar**

PAYMENT BILL OF GOVERNMENT OF KHYBER PAKHTUNKHWA.

OFFICERS TUNKHWA. appropriation in respect of

Amex-1v

13

\*Note:- Government accepts no responsibility for a money or cheque, bill made over to a member.  
Name of Government Officer: Mr. Salah Uddin

DFO WILDLIFE ABBOTTABAD

District Audit No.	Major Function Minor Function Detailed Function	ue No.	Voucher No. of List of payment 06/2020.	Monthly Rate Rs.	Amount Rs.
Salary		Received for the month of 06/2020			
		0 10			
		O1101		46960.00	46,960
		O1101			
		0.10			46,960.00
		0.20			
	Regular Allowance	A O1202		0	0
	House Rent Allowance	A O1203		0	0
	Convenence Allowance	A O1217		1500	1500
	Medical Allowance	A0122Y		4696	4,696
	Adhoc Releif Allowance 10% (2017)	A0121T		0	800
	Adhoc Releif Allowance 5% (2013)	A0123G		4696	4,696
	Adhoc Releif Allowance 10% (2018)	A0123M		2348	2,348
	Adhoc Releif Allowance 10% (2019)	A0122C		2930	2,930
	Adhoc Releif Allowance 10% (2016)			556	556
	Adhoc Releif Allowance 2.5% (2015)				
	Total Regular Allowances	0.20			17526
	Other Allowances (Excluding T.A)	0.30			0
	Travelling Allowance				0
	Honoraia	0.33			0
	Medical Charges	0.34			0
	Total Other Allowances (Excluding T.A)	0.30			0
	Gross Claim, Establishment Charges	0.000			64,486.00
	<b>Less:- Fund Deduction:-</b>				
	General Provident Fund (Account No. 0618)	11502		5360	5,360.00
	G.P.F W/D	13336		0	-
	Benevolent Fund	13336		800	800.00
	Retirement Benefit and Death Compensation	13337		1350	1,350.00
	Net Claim	..		7510.00	7,510.00
	<b>Deduction:-</b>				
	I/Tax	0.112		0	724
	recovery over payment	C-03870		0	0
	House Rent 5 %	C02701		0	2348
	House Building Advance	2251		0	0
	<b>Total Net Amount Payable</b>				<b>53,904.00</b>

Net Amount Payable Rs. 53904/= In words (Rupees Fifty Three Thousand Nine hundred and four Only.) through cheque No. .

Attested

Divisional Forest Officer  
Abbottabad Wildlife Division  
Abbottabad

(Signature of Officer)

Superintendent  
Wildlife Head Office  
Peshawar

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

**NOTIFICATION**

**No. SO (EsII)/FE&YOM/1-26/2023**

In pursuance of Section 8(1) of the Khyber Pakhtunkhwa Civil Servant Act, 1973, read with Rule-17 of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989, the Competent Authority (Chief Secretary, Government of Khyber Pakhtunkhwa) is pleased to notify / circulate final 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.

Sl. No.	Name of Officer and Academic Qualification	Date of Birth and District	Date of Entry into Govt. Service	Regular Appointment / Present Post		Remarks
				Date	BPS	
1	Mr. Abdul Ghafoor, M.Sc Forestry (Extension) and MS Wildlife Ecology Management	<u>01-01-1968</u> Swat	<u>28-10-1992</u> BPS-16	02-05-2012	18	By Promotion Already appointed as Conservator Wildlife BS-19 on A.C.B/Conservator Wildlife/ Project Director, Mini Zoo Swat (on deputation basis)
2	Mr. Mohammad Hussain-II, M.Sc Forestry	<u>05-02-1969</u> Mohmand Agency	<u>28-10-1992</u> BPS-16	02-05-2012	18	By Promotion Already appointed as Conservator Wildlife BS-19 on A.C.B. Conservator Wildlife, National Park
3	Mr. Ifkhar-uz-Zaman, M.Sc Forestry, Botany and M.S Wildlife Biology	<u>10-04-1971</u> Abbottabad	<u>29-02-1996</u> BPS-16	02-05-2012	18	By Promotion Already appointed as Conservator Wildlife BS-19 on A.C.B. Presently posted as Conservator Wildlife, Central Wildlife Circle, Peshawar
4	Mr. Mohammad Ayaz Khan, M.Sc Forestry and Wildlife Biology	<u>01-09-1971</u> Mardan	<u>29-02-1996</u> BPS-16	02-05-2012	18	By Promotion Divisional Wildlife Officer, Mardan Wildlife Division

*Attested*

*M. J. Khan*  
Superintendent  
Wildlife Head Office  
Peshawar

*P.T.O.*

*S*

15

5.	Mr. Mohammad Niaz, M.Sc Forestry and MS Wildlife Biology	<u>12-04-1972</u> Mardan	<u>29-02-1996</u> BPS-16	02-05-2012	18	By Promotion	Already appointed as Conservator Wildlife BS-19 on A.C.B. Presently posted as Conservator Wildlife/Director Peshawar Zoo
6.	Mr. Sajjad Ali, M.Sc Forestry, Botany and Wildlife Biology	<u>15-04-1969</u> Mohmand Agency	<u>29-02-1996</u> BPS-16	02-05-2012	18	By Promotion	Divisional Wildlife Officer, Dir Wildlife Division
7.	Mr. Mohammad Shakeel, M.S Forestry and Economics	<u>10-06-1972</u> Abbottabad	<u>23-02-1997</u> BPS-16	02-05-2012	18	By Promotion	Assistant Professor of Forestry, PFI, Peshawar
8.	Mr. Mohammad Israr, M.Sc Forestry and Post Graduate Diploma in GIS	<u>02-01-1973</u> Mohmand Agency	<u>12-03-1997</u> BPS-16	02-05-2012	18	By Promotion	Divisional Wildlife Officer, Peshawar Wildlife Division
9.	Mr. Mohammad Faique Khan, M.Sc Forestry	<u>12-03-1974</u> Swat	<u>04-07-1997</u> BPS-16	02-05-2012	18	By Promotion	Divisional Wildlife Officer, Kohistan Wildlife Division
10.	Mr. Abdul Haleem Khan, M.Sc Zoology, B.Sc Forestry, and B.Ed	<u>20-03-1971</u> Lakki Marwat	<u>27-10-1999</u> BPS-16	02-05-2012	18	By Promotion	Divisional Wildlife Officer/ Monitoring Officer, NMA, in the AIP Project (on deputation basis)
11.	Mr. Khan Malook Khan, B. Sc Forestry	<u>10-07-1974</u> Bannu	<u>27-09-1999</u> BPS-16	02-05-2012	18	By Promotion	Divisional Wildlife Officer, Bannu Wildlife Division
12.	Mr. Ejaz Ahmad M.Sc Forestry	<u>08-02-1983</u> Malakand	<u>13-10-2014</u> BPS-17	13-07-2020	18	By Promotion	Divisional Wildlife Officer, Buner Wildlife Division
13.	Miss Haseena Anbarin M.Sc Forestry M. Phil.	<u>17-02-1984</u> Bannu	<u>20-11-2008</u> BPS-16	13-07-2020	18	By Promotion	Deputy Director Peshawar Zoo
14.	Mr. Salah-ud-Din Ayubi M.Sc Forestry	<u>25-04-1980</u> Peshawar	<u>20-11-2008</u> BPS-16	13-07-2020	18	By Promotion	Divisional Wildlife Officer (Headquarter) Peshawar
15.	Mr. Muhammad Abdus Samad M.Sc Forestry	<u>28-01-1986</u> F.R Bannu	<u>20-11-2008</u> BPS-16	13-07-2020	18	By Promotion	Divisional Wildlife Officer, Kohat Wildlife Division
16.	Mr. Niamat Ullah Khan M.Sc Forestry	<u>13-04-1987</u> North Waziristan Agency	<u>13-10-2014</u> BPS-17	13-07-2020	18	By Promotion	Divisional Wildlife Officer, Nowshera Wildlife Division
17.	Mr. Muhammad Idress M.Sc Forestry	<u>10-04-1982</u> Shanqla	<u>13-10-2014</u> BPS-17	13-07-2020	18	By Promotion	Divisional Wildlife Officer, Abbottabad Wildlife Division

Attested

M. J. b  
Wildlife Head Office  
Peshawar.



18.	Mr. Ishliaq 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	Divisional Wildlife Officer, North Waziristan Wildlife Division
19.	Miss Maria Marjan M.Sc Forestry	10-03-1985 Karak	13-10-2014 BPS-17	11-08-2021	18	By Promotion	Divisional Wildlife Officer, Haripur Wildlife Division
20.	Mr. Rehmatullah, F.A.	15-10-1963 Bannu	02-06-1982 BPS-05	11-08-2021	18	By Promotion	Divisional Wildlife Officer
21.	Syed Taimur Ali Shah M. Sc Forestry	20-12-1985 Swat	31-12-2015 BPS-17	11-08-2021	18	By Promotion	Divisional Wildlife Officer, National Park Mansehra
22.	Mrs. Manahil Wahab M. Sc Forestry M.Phil Wildlife Management	18-01-1992 D.I. Khan	31-12-2015 BPS-17	11-08-2021	18	By Promotion	Posted at PFI Peshawar
23.	Mr. Kiramat Shah M. Sc Forestry	02-01-1991 Peshawar	31-12-2015 BPS-17	11-08-2021	18	By Promotion	Divisional Wildlife Officer, Mohmand Wildlife Division
24.	Mr. Munsef Ali, M.Sc Forestry	13-05-1989 Orakzai Agency (FATA)	31-05-2016 BPS-17	11-08-2021	18	By Promotion	Divisional Wildlife Officer, Kurram Wildlife Division
25.	Syed Sami ad Hussain Shah, M.Sc Forestry	18-08-1993 Mansehra	31-05-2016 BPS-17	18-04-2022	18	By Promotion	Divisional Wildlife Officer, Mansehra Wildlife Division
26.	Mr. Naveed-Ul-Haq, M. Sc Forestry	15-05-1988 Dir (Lower)	20-11-2008 BPS-16	18-04-2022	16	By Promotion	Divisional Wildlife Officer, Malakand Wildlife Division

Attended

*[Signature]*

Superintendent  
Wildlife Head Office  
Peshawar

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
CLIMATE CHANGE, FORESTRY, ENVIRONMENT & WILDLIFE  
DEPARTMENT

Idst: No. SO (Estt) /FE&WD/II-26/2023

17467-70

Dated Peshawar the, 28<sup>th</sup> December, 2023

Copy is forwarded to:-

Chief Conservator Wildlife Khyber Pakhtunkhwa, Peshawar.  
Conservators Wildlife, Wildlife Department, Khyber Pakhtunkhwa.  
Officers concerned.

*cc all*  
*I agreed copy may be send to all*  
*cc all and for your info in idst. for*  
*copy: 9 ma pm*

Agreed.  
*[Signature]*  
3/1/24

*[Signature]*  
(HAFIZ ABDUL JALIL)  
SECTION OFFICER (ESTT) 28/12/2023

17

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

**SERVICE APPEAL NO.2284/2023**

Miss Haseena Anbarin  
Deputy Director/Divisional Wildlife Officer  
Peshawar Zoo ..... (Appellant)

**VERSUS**

1. Government of Khyber Pakhtunkhwa through  
Chief Secretary Khyber Pakhtunkhwa, Peshawar
2. The Secretary to Government of Khyber Pakhtunkhwa  
Climate Change, Forestry, Environment and  
Wildlife Department, Peshawar.
3. The Chief Conservator Wildlife,  
Khyber Pakhtunkhwa, Peshawar ..... (Respondents)

**PARAWISE COMMENTS ON BEHALF OF  
RESPONDENTS NO. 1,2 & 3**

Respectfully Sheweth;

**PRELIMINARY OBJECTIONS**

1. The appeal is not maintainable in the present form.
2. The Appellant has no locus standi and cause of action to bring the present appeal.
3. The appeal is time barred and hit by limitations.
4. That the appeal is non-maintainable for mis-joinder and non-joinder of proper parties.

~~Parawise comments on behalf of Respondents are submitted as under:~~

**ON FACTS:**

1. Correct. The appellant is serving as Divisional Wildlife Officer BPS-18 in Khyber Pakhtunkhwa Wildlife Department.
2. Correct. The appellant was selected as Range Officer Wildlife (BPS-16) being recommended by the Khyber Pakhtunkhwa Public Service Commission.
3. Correct. The appellant was recommended and selected by the Khyber Pakhtunkhwa Public Service Commission as Sub-Divisional Wildlife Officer (BPS-17).
4. Correct.
5. In-correct. As per service rules of the Department, the post of Deputy Conservator Wildlife/Divisional Wildlife Officer (BPS-18) is required to be filled up by promotion on the basis of seniority-cum-fitness, from amongst holders of the posts of Sub-Divisional Wildlife Officers (BPS-17) with five years' service as such (Annex-1). The length of service of the appellant in BPS-17 was less than five years; therefore,

*Attested*

*M. A. K.*  
Superintendent  
Wildlife Head Office  
Peshawar

she was appointed as Deputy Conservator Wildlife/Divisional Wildlife Officer (BPS-18) on Acting Charge Basis on 17/01/2018 (Annex-II).

18

- 6. Correct to the extent that the appellant filed departmental appeal for alteration of Seniority List of the post of Deputy Conservator Wildlife/Divisional Wildlife Officer (BPS-18), however the appeal of the appellant was rejected by the competent authority as per prevailing rules (Annex-III).

⑦ The appellant has got no cause of return to file instant service appeal.  
**ON GROUNDS**

- A). Correct. *Need no comments.*
- B). Correct, however as explained in Para-5 above, the conditions mentioned in Para-B, do not apply to the appellant.
- C). In-correct. *As replied in above paras.*
- D). Incorrect, the appeal was considered by the competent authority and rejected on grounds mentioned in para-6 above.
- E). Incorrect, as explained above.
- F). Incorrect, no discrimination with appellant has been made by the department.
- G). Incorrect, as explained above.
- H). Incorrect, the appellant has been promoted as Deputy Conservator Wildlife/Divisional Wildlife Officer (BPS-18) on regular basis vide Notification dated 13/07/2020 (Annex-IV).
- I). *No comments. The respondents seek leave to raise additional grounds at the time of arguments.*

In view of the above exposition, it is most humbly prayed that the instant service appeal may kindly be dismissed being devoid of merit, please.

Other connected appeal having similar facts and contents may also be vetted on the same terms.

**Secretary**  
 Government of Khyber Pakhtunkhwa  
 Climate Change, Forestry, Environment and Wildlife Department  
 (Respondent No.2)

**Chief Conservator Wildlife**  
 Khyber Pakhtunkhwa Peshawar  
 (Respondent No.3)

*Attested*

*Filed subject to condition, compliance of bills at 29/11/23, AH/MSU and approval of AAQ/MSU*

**Chief Secretary**  
 Khyber Pakhtunkhwa  
 (Respondent No.1)

*[Signature]*  
 Superintendent  
 Wildlife Head Office  
 Peshawar

*30-01-2024*  
 Assistant Advocate General  
 Khyber Pakhtunkhwa  
 Services Tribunal Peshawar

*AAQ/MSU 1.9*  
*12/11/24*  
*30/11/24*

19

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO.2285/2023

Mr. Salah-Ud-Din Ayubi  
Divisional Forest Officer Wildlife Headquarter  
Peshawar

..... (Appellant)

**VERSUS**

1. Government of Khyber Pakhtunkhwa through  
Chief Secretary Khyber Pakhtunkhwa, Peshawar
2. The Secretary to Government of Khyber Pakhtunkhwa  
Climate Change, Forestry, Environment and  
Wildlife Department, Peshawar.
3. The Chief Conservator Wildlife,  
Khyber Pakhtunkhwa, Peshawar.
4. The Conservator Wildlife  
Southern Circle Bannu

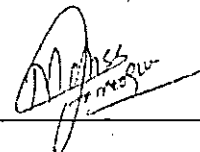
..... (Respondents)

**AFFIDAVIT**

I Mr. Mohsin Farooque, Chief Conservator Wildlife, Khyber Pakhtunkhwa, do hereby solemnly affirm and declare on oath that the contents of the instant comments are true and correct to the best of my knowledge and belief, and that nothing has been concealed from this honorable court.

It is further stated on oath that the answering respondent have neither been placed ex-parte nor their defense has been struck off/cost.

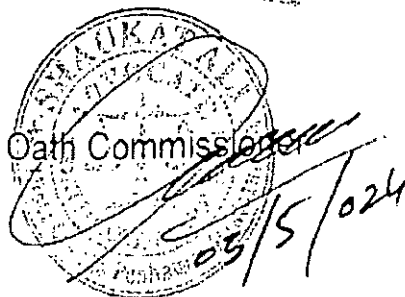
Signature

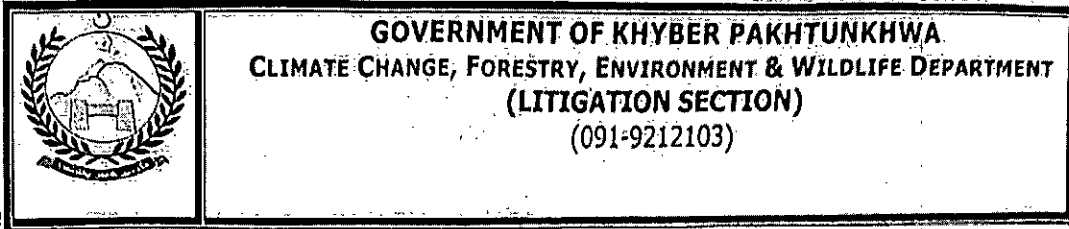


Chief Conservator Wildlife  
Khyber Pakhtunkhwa  
Peshawar.

CNIC No. 17301-1354080-3

ATTESTED

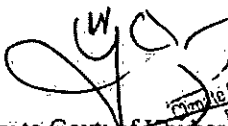




**AUTHORITY LETTER**

**NO. SO(Lit:)/CCFE&WD/3-419/2023:-** Mr. Aamir Shahzad Khattak, Section Officer (Litigation), Climate Change, Forestry, Environment & Wildlife Department bearing C.N.I.C No. **17301-8876189-3** and Cell No. **0314-9900975** is hereby authorized to appear in the Khyber Pakhtunkhwa Service Tribunal Peshawar to file reply / comments, attend the Court on every hearing in Service Appeals No. 2284/2023, 2285/2023 & 2286/2023 titled "Hascena Anbarin, Salah-ud-Din Ayubi & Abd-us-Samad v/s Government of Khyber Pakhtunkhwa & others" on behalf of Secretary to Govt. of Khyber Pakhtunkhwa, Climate Change, Forestry Environment & Wildlife Department till final decision of the Court.

He is also authorized to file written reply, produce record and record evidence on his behalf, if any, required in the Court mentioned above.

  
 SECRETARY  
 Climate Change, Forestry, Environment  
 & Wildlife Department  
 Secretary to Govt. of Khyber Pakhtunkhwa  
 Climate Change, Forestry, Environment & Wildlife Department