


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 1627/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27 /09/2024	<p>The appeal of Mr. Qaiser Abbas Khan presented today by Mr. Saleemullah Khan Ranazia Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on 21.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

service appeal No. 1627/2024

Qaisar Abbas Khan Versus Government of Khyber Pakhtunkhwa, etc.

INDEX

<u>S.NO.</u>	<u>PARTICULARS OF THE CASE.</u>	<u>ANNEXURES.</u>	<u>PAGES.</u>
1.	Memo and grounds of appeal.		1 to 7
2.	Copy of appointment order	'A'	8 to 9
3.	Copy of order	'B'	10
4.	Copy of regularization order	'C'	11
5.	Copy of order	'D'	12 to 13
6.	Copy of seniority list	'E'	14 to 20
7.	Copy of transfer order	'F'	21
8.	Copy of promotion order	'G'	22
9.	Copy of departmental appeal/representation	'H'	23 to 27-27-1
10.	Copy of notification	'I'	28
11.	Copies of transfer orders	'J'	29-30
12.	Copies of orders	'K'	31-34
13.	Vakalatnama.		

Your Humble appellant:  
(Qaisar Abbas Khan)  
Forester  
Cell No. 03467861810

Dated:

Through counsel

(Saleemullah Khan Ranzai)  
Advocate Supreme Court.  
Stationed at D.I.Khan  
Cell No.03339159808

①

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

Service Appeal

/2024

Qaiser Abbas Khan , D.I.Khan Forest Division, Bannu Forest Circle

(Appellant)

**Versus**

1. Government of Khyber Pakhtunkhwa through Secretary Environment & Forest Department Khyber Pakhtunkhwa , Peshawar.
2. Chief Conservator of Forest (Central Southern Region-1), Khyber Pakhtunkhwa Peshawar.
3. Muhammad Asif Khan, Deputy Ranger , Ranger , Range Management Circle Peshawar

(Respondents)

**SERVICE APPEAL UNDER SECTION 4 OF KP SERVICE TRIBUNAL ACT 1973**  
**AGAINST THE NON-REPLY OF THE DEPARTMENTAL APPEAL**  
**/REPRESENTATION DATED 30.05.2024, WHEREBY THE APPELLANT**  
**QUESTIONED THE PROMOTION OF JUNIORS TO THE APPELLANT TO THE**  
**POST OF FORESTER BPS-10 TO THE POST OF DEPUTY RANGER BPS-12**  
**DATED 14.05.2024, ISSUED BY CHIEF CONSERVATOR OF FOREST**  
**(CENTRAL SOUTHERN REGION-1)**

**Respectfully Sheweth,**

The appellant prefers the instant service appeal on the grounds hereinafter submitted apropos the following facts.

(Note:- The addresses of respondents as given above are sufficient for the purpose of service.)

**BRIEF FACTS**

- i. That the appellant was initially appointed in a project vide order dated 14.03.1998 as forester at forestry sector project Peshawar. Copy of order is enclosed herewith as (Annexure-A).

- ii. That the appellant was appointed as forester vide order 09<sup>th</sup> October 2009 in D.I.Khan forest division. Copy of order is enclosed herewith as Annexure-B.
- iii. That as the services of almost all the employees were regularized, who were already working on contract / temporary basis, therefore, the appellant filed a writ petition, which was allowed and thereafter, the services of the appellant was adjusted as forester from 22<sup>nd</sup> November 2006 vide order dated 02.04.2023. Copy enclosed herewith as Annexure-C.
- iv. That one Muhammad Asif Khan was appointed as forester vide order dated 24<sup>th</sup> march 2017 at D.I.Khan forest Division. Copy enclosed herewith as Annexure-D.
- v. That the department issued seniority list of the foresters BPS-10 of Bannu Circle on 13.12.2022, wherein the name of the appellant appears at serial No.26, whereas the said Muhammad Asif Khan is at serial No.35 and it is pertinent to mention here that in the relevant column he has been shown as untrained. Copy of seniority list enclosed herewith as Annexure-E.
- vi. That the said Muhammad Asif Khan got himself transferred vide order dated 07.09.2023 to Range Management Circle Peshawar. Copy of order enclosed herewith as Annexure-F.
- vii. That astonishingly the Chief conservator of forest central southern forest region-I Khyber Pakhtunkhwa Peshawar vide order dated 14.05.2024 promoted as many as 24 foresters BPS-10 to deputy Ranger BPS-12, wherein the name of Muhammad Asif Khan is mentioned at Serial No.7 who was initially appointed in Bannu Circle and it is evident from his appointment order that he has been appointed in the year 2017 in Bannu Circle, which promotion order dated 14.05.2024 is totally illegal against the rules and the violation of service laws. Copy of impugned order is enclosed herewith as Annexure-G.

- viii. That being aggrieved, the appellant has preferred departmental appeal / representation on 30.05.2024 through proper channel to the respondent No.1. Copy of appeal /representation is enclosed herewith as Annexure-H.
- ix. That the appeal / representation of the appellant was never replied till the statutory period and even thereafter till date, therefore, being aggrieved, the appellant is approaching this honourable Tribunal for the redressal of his grievances on inter-alia the following grounds:

GROUNDS

- i. That the impugned promotion order in violate of the service laws and the said Muhammad Asif Khan managed all the transfer orders and subsequent promotion in league with superiors of the department, whereas it is evident from the seniority list that he was placed at serial No.35, whereas the appellant is at serial No.26, keeping in view the initial orders.
- ii. That the non-reply / decision of the departmental appeal/ representation by the secretary in the statutory period prompted the appellant to file the instant appeal, which non reply smells malafide on the part of the department that they cannot justify the impugned order dated 14.05.2024.
- iii. That it is also evident from the notification dated 05<sup>th</sup> October 2012 by referring the powers vested in the competent authority of the item 1-6 part -1 of defunct West Pakistan Manual volume-II, for the purpose of initial appointment of forester and promotion of forester to the rank of deputy rangers, in each circle on the basis of circle wise seniority list of the foresters, which are as under.
- Upper Hazara Circle
  - Lower Hazara Circle
  - Malakand west Circle
  - Malakand east Circle

- e. FATA circle
  - f. Southern Circle (now Kohat, Bannu and Peshawar Circle)
  - g. Water shad management circle
  - h. Forestry planning and monitory circle
- iv. It is pertinent to mention here that in the same notification it has specifically been highlighted that, "the seniority of the foresters and deputy rangers shall be determine and fixed in the respective circles on the basis of their initial appointment".
- v. It is pertinent to mention here that the said Muhammad Asif Khan was appointed in Bannu circle and that is why in the seniority list prepared in the year 2022 his name is appearing in the said list but in clear violation of this notification dated 05<sup>th</sup> October 2012, the said Muhammad Asif Khan has been promoted to deputy Ranger by ignoring his initial appointment at Bannu circle. Copy of notification is enclosed herewith as Annexure-I.
- vi. It is also pertinent to mention here that the said Muhammad Asif Khan managed his transfer and promotion through backdoor, as if at all after creation of new circle, instead of fresh appointment, the senior most foresters and other employees were required to be transferred to the newly established circle then in Bannu circle the petitioner should have been transferred to range Management circle but the said Muhammad Asif Khan was transferred and got promoted because he once again managed his promotion by bypassing the senior most foresters in the said circle. It is pertinent to mention here that one Siddique Akbar forester was transferred to the range management circle on 28.02.2024 and one Arshad Ali forester was also transferred to Range Management circle from Unit-IV Mangora Swat vide order dated 24.04.2024, both of them are senior to the said Muhammad Asif Khan as transferred prior to the said Muhammad Asif Khan to the newly created circle Range Management circle. Copies of transfer orders are enclosed herewith as Annexure-J.

- 5
- vii. That if at all the said Muhammad Asif Khan was required to be promoted then why once again the seniority list of Range Management circle was violated.
- viii. That it is pertinent to mention here that although said Muhammad Asif Khan managed his transfer from Bannu circle to Range management circle in documents but infact he also managed order dated 20.02.2024, whereby he never went to Peshawar rather he was posted and adjusted as SDFO D.I.Khan (Bannu circle) as stop gap arrangement and then after promotion he remained on the same post till date and he also managed another order, whereby after getting promotion he was directed to work at D.I.Khan division (Bannu Circle), meaning thereby in the documents he has been transfer to Peshawar but practically he never went to Peshawar and remained at D.I.Khan division. Copies of the orders are enclosed herewith as Annexure-K.
- ix. That it is pertinent to mention here that in the appointment order it is clearly mentioned that the forester BPS-10 must undergo the compulsory training and to pass the exam for one year and in case of failure or avoid to undergo training, he should be removed from service soon after declaration of result but the said Muhammad Asif Khan never undergone the one year training nor has passed the said training as required by the terms and condition No.IV of the appointment order, whereas the appellant did passed the said training well within time as mentioned in the terms and conditions, within the probation period, therefore, the said Muhammad Asif Khan was not only eligible for promotion but was required to have been removed from service under the condition mentioned above.
- x. That keeping in view the notification dated 05 October 2012, in Bannu Circle D.I.Khan division the appellant is the senior most forester and he should have been promoted instead of said Muhammad Asif Khan.
- xi. That counsel for appellant may also be allowed to raise additional grounds at the time of arguments.

**PRAYER**

It is therefore requested that on acceptance of instant service appeal, the promotion order of Muhammad Asif Khan dated 14.05.2024 may be declared against the law and ineffective upon the rights of appellant and the appellant may be ordered to be promoted to the post of Deputy Ranger BPS-12 from the date, when the said Muhammad Asif Khan was promoted with all back benefits.



Your Humble appellant:  
(Qaisar Abbas Khan)  
Forester  
Cell No. 03467861810

Dated:

Through counsel



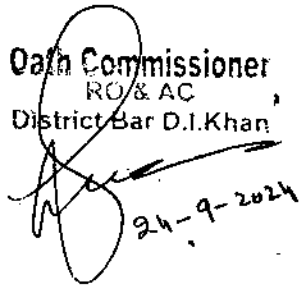
(Saleemullah Khan Razvi)  
Advocate Supreme Court.  
Stationed at D.I.Khan  
Cell No.03339159808

**AFFIDAVIT**

I, Qaisar Abbas Khan forester, appellant do hereby solemnly affirm on Oath that the contents of the petition are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.

Dated

Oath Commissioner  
RO & AC  
District Bar D.I.Khan

  
21-9-2024

Deponent.  
(Identified by)



(Saleemullah Khan Razvi)  
Advocate Supreme Court.  
Stationed at D.I.Khan  
Cell No.03339159808



7

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

service appeal No. \_\_\_\_\_/2024

**Qaisar Abbas Khan** Versus **Government of Khyber Pakhtunkhwa, etc.**

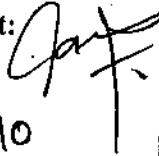
**Memo of addresses of the parties**

Qaisar Abbas Khan forester, D.I.Khan forest division, Bannu Forest Circle  
**(Appellant)**

Versus


1. Government of Khyber Pakhtunkhwa through Secretary Environment & Forest Department Khyber Pakhtunkhwa, Peshawar.
2. Chief Conservator of Forest (Central Southern Region-1), Khyber Pakhtunkhwa, Peshawar
3. The Conservative of Forest, Southern Forest Circle Bannu.
4. Divisional Forest Officer, D.I.Khan forest Division D.I.Khan
5. Muhammad Asif Khan Deputy Ranger, Range Management Circle Peshawar.

**(Respondents)**

Your Humble appellant:  
(Qaisar Abbas Khan)   
Forester  
Cell No. 03467861810

Dated: 26.9.2024

Through counsel

  
(Saleemullah Khan Ranazai)  
Advocate Supreme Court.  
Stationed at D.I.Khan  
Cell No.03339159808



# NWFP Forestry Sector Project

## A Sector Support Project

11

191

A-8

ORDER NO. 48

Dated 14-03-1998

Consequent upon the recommendation of the Selection Committee constituted vide Project Director office order No. 37 dated 27/2/98 the following candidates are hereby appointed as Senior Forest Technician in BPS-07 in NWFP Forestry Sector Project, on contract basis.

Sr. No.	Name	Father Name
1.	Mr. Kiramat Ullah	Ahmad Jan
2.	Mr. Nisar Ahmad	Said Akbar
3.	Mr. Akhtar Saeed	Muhammad Jan Aurakzai
4.	Mr. Syed Asad Inran	Syed Mushtaq Hussain
5.	Mr. Mohanmad Tahir	Mati Ullah
6.	Mr. Mohammad Nazir Ahmed	Miandad
7.	Mr. Sanaullah	Shehzad Khan
8.	Mr. Arshad Ali	Hussain Shah
9.	Mr. Asmat Ullah	Hamidullah Khan
10.	Mr. Qaisar Abbas Baloch	Qayum Nawaz Baloch

The contract is renewable on year to year basis, subject to their satisfactory performance and subject to continuation of the Project. The appointment is further subject to the following terms and conditions:

1. The terms and conditions of their appointment to the post will be regulated by NWFP Civil Servants Act, 1973 and NWFP Civil Servant (Appointment, Promotion and Transfer) Rules, 1989.

Their appointment will purely temporary and their services can be terminated at 15 days notice without any reason being assigned at any time irrespective of the fact that they are holding the post other than the one to which they were originally recruited or on the payment of 15 days salary in lieu of the notice or on the winding up of the project.

In case they wishes to resign at any time, one month's notice will be necessary or in lieu thereof a month's pay shall be forfeited.

153 (17) A-9  
They will be governed by such rules, orders and instructions relating to pay, leave, T.A. & Medical Attendance etc: as may be issued by the Govt. for the status of Govt. servants to which they belongs.

5 Their appointment to the above posts will not confirm on them any right of regular appointment/absorption or any other post and nor their services will count towards seniority/promotion.

6 Their appointment will be subject to the satisfactory report on the verification of their character antecedents.

7 They will have to produce a Medical Certificate of fitness from a Standing Medical Board.

8 The offer is valid for 30 days.

9 The offer is subject to the condition that they will execute an agreement with the Conservator of Forests/Project Director, NWFP Forestry Sector Project, Peshawar.

(Sher Mohammad)  
Incharge/D.F.O. HRD Unit

No. 1510-16 N.F.S.P(24) Dated 14-7-98.

Copy forwarded to:

1 Project Director, Conservator of Forests, NWFP Forestry Sector Project, Peshawar.  
2 All Unit Incharge  
3 Admin. Officer  
4 Account Officer  
5 All concerned  
Office Order File.  
Personal File.

(Sher Mohammad)  
Incharge/D.F.O. HRD Unit

401  
B-10  
OFFICE ORDER NO. 27 DATED D.I.KHAN THE 09 TH OCTOBER 2009 ISSUED BY ABDULLAH KHAN  
DIVISIONAL FOREST OFFICER, D.I.KHAN FOREST DIVISION D.I.KHAN.

In compliance with the Judgment / orders of the August Peshawar High Court Bench D.I.Khan dated 14/05/2009 in the writ petition No. 359/2006 as well as advise / opinion of the Deputy Advocate General NWFP, D.I.Khan vide letter No. 565/DAG dated 08/10/2009, Mr. Qaisar Abbas S/O Qayyum Nawaz is hereby appointed as Forester in revised Basic Pay Scale No. 7 scale of (Rs. 3530 - 190 - 0230) against the existing vacancy available in D.I.Khan Forest Division with effect from the date of his arrival for duty.

The appointment to the post will be governed by the following terms and conditions as contained in the Government of NWFP Finance Department letter No. FD (SOSR - H) 12 - 1/ 2002 dated 26/10/2002:

1. The appointment is purely temporary on "Contract Basis" against the existing vacancy in D.I.Khan Forest Division and can be terminated at any time without showing him any cause and reason or opportunity. In case he wishes to resign at any time a notice for (2) two months in advance will be necessary or remit an amount equal to (2) two months pay in lieu thereof, or on abolition of the post whichever ever is earlier.
2. He will appear in the test and interview for appointment of Forester as & when called by this office and will get himself selected for the post of Forester otherwise his services will be terminated and the candidate recommended by the Departmental selection committee will be appointed against the vacancy.
3. He will be entitled to all facilities relating to pay, leave, Traveling Allowance, House rent allowance and Medical allowance except pension / gratuity as may be admissible to the contractual Government servants of equivalent status to which he belongs.
4. As long as approval of this post is continued to receive from Finance Department Government of N.W.F.P on year to year basis, his appointment will continue to be valid and in case the approval of Finance Department ceased to exist for any reason, he will automatically be terminated from service. In that case he will have no right or claim what so ever for further continuation / absorption against any of the post falling vacant in D.I.Khan Forest Division or Circle or Province.
5. He will be governed by such rules and regulations announced by the Government of NWFP as applicable to class of service to which he belongs.
6. He will have to undergo training of Forester at Sarhad Forest School Thal at Abbottabad, and will successfully pass the examination / training. In case he avoided undergoing training (on nomination for training) under the shelter of any reason i.e. Medical illness, domestic affairs or political influence etc; he will automatically be terminated from service. In case he failed to successfully pass Forest Guard training / examination, he will be removed from service soon after declaration of results.
7. Initially he will remain on probation of (2) two years (subject to continuation of posts) extendable up to (4) four years and his services can be terminated at any time without assigning any notice if his performance or conduct is found unsatisfactory during the probation period and extended probation period.
8. He will have to produce Medical fitness Certificate from the Medical Superintendent District Teaching Hospital D.I.Khan within (10) Ten days from the date of joining his service.
9. His appointment to the above post shall neither confer on him any right of regular appointment / absorption against the post nor shall his services count towards pension.
10. He will be removed from service if his antecedent is found unsatisfactory after verification from the District Police Officer, D.I.Khan.

If he accepts the post on the terms and conditions mentioned above he should report himself for duty within (10) ten days and produce original certificates in connection with his qualification and domicile etc.

(ABDULLAH KHAN)  
DIVISIONAL FOREST OFFICER  
D.I.KHAN FOREST DIVISION  
D.I.KHAN

No. 1186-89 IG,

Copy for information & necessary action is forwarded to:-

1. The Chief Conservators of Forests, NWFP Peshawar.
2. Conservator of Forests, Southern Circle Peshawar.
3. Mr. Qaisar Abbas S/O Qayyum Nawaz resident of Khanpur Shumali post office Rangpur Shumali Tehsil Pataipur district D.I.Khan for information and necessary action.
4. Head Clerk and Accountant Divisional Office D.I.Khan.

Received  
09/10/09

(ABDULLAH KHAN)  
DIVISIONAL FOREST OFFICER  
D.I.KHAN FOREST DIVISION  
D.I.KHAN

In light of record note of the meeting of the minutes dated; 07.11.20220, issued vide Chief Conservator Forest NWFP Peshawar wherein, Secretary Environment has directed that both trained as well as un-trained official will be considered for re-appointment and no fresh candidates will be considered by the respective DFOs until and unless absorption of FSP staff has been completed.

Two batch mate of the appellant has been appointed vide DFO D.I.Khan office order No. 32 & 33 dated; 21<sup>st</sup> November, 2006 and later on the appellant was appointed vide DFO D.I.Khan office order No. 27 dated 09<sup>th</sup> October, 2009, which badly effect his seniority.

Keeping in view the above ex-position and judgment Issued honorable Khyber Pakhtunkhwa Service Tribunal Peshawar dated; 18.12.2021, with the remarks that "this tribunal finds that the appellant has not been assigned his correct seniority alongwith his batch-mates, thus, the mere fact that he was appointed later which would not deprive him of his seniority. As such, this tribunal holds that the appellant be assigned seniority with effect from the date, his batch-mates of the same selection process were appointed"

Therefore, the competent authority is pleased to order restoration / adjustment of inter-seniority of Mr. Qaiser Abbas Forester BPS-10 of D.I.Khan Forest Division from the date of his senior batch-mates were appointed i.e with the staff recruited from the FSP in 2006 with effect from 21<sup>st</sup> November, 2006 in the best interest of public.

The intervening period i.e from 22<sup>nd</sup> November, 2006 to 08<sup>th</sup> October, 2009, will not be counted towards other back benefits as the appellant has not performed duty during this period with the Department.

Sd/-  
(Amin-Ul-Islam)  
Divisional Forest Officer  
D.I.Khan Forest Division  
D.I.Khan

No. 9031-33 IE

Copy forwarded for information to the: -

1. Chief Conservator of Forests Central & Southern Forest Region-I Khyber Pakhtunkhwa Peshawar, please.
2. Conservator of Forests Southern Forest Circle Bannu.
3. Mr. Qaiser Abbas Forester for information and necessary action.
4. Office Order file.

Sd/-  
Divisional Forest Officer  
D.I.Khan Forest Division  
D.I.Khan

0-12

On the recommendation of departmental selection committee constituted vide Divisional Forest Officer D.I.Khan Office Order No. 41 dated 03/03/2017, Muhammad Asif Khan S/O Muhammad Ismail Khan resident of Mochan in Bumbin Kbel Village and Post Office Gul Imam Tehsil & District Tank is hereby appointed as Forester in basic pay scale No. 10 (Rs. 10180-670-30280) with usual allowances as admissible to him by the Government from time to time against the vacant post of Forester due to approval of SNE "Creation bifurcation of Kutachi Range" vide Finance Department letter No: BO-11/PD/ (1-3) (A/SNE/Forests/2016/2017 dated 30.01.2017 for the year 2016-17 in D.I.Khan Forest Division with effect from the date of his arrival for duty.

His appointment shall be subject to observing the following terms and conditions;

- i. He will receive pay at the minimum of BPS-10 plus usual allowances as admissible under the rules. He will also be entitled to Annual Increment as per existing policy.
- ii. The appointment is purely on temporary "contract basis". His services can be terminated at any time without showing him any cause and reason or opportunity after giving him with (14) fourteen days notice. In case he wishes to resign at any time, (14) days notice will be necessary or in lieu thereof 14 days pay will be forfeited.
- iii. In case of re-tenement of staff, if desired by the department due to either abolishment of this vacancy or any other reason the appointee will be having no right or claim for transfer or adjustment against any vacancy in this Division or Circle of Province.
- iv. He will have to undergo training of Forester at Sarhad Forest School Tank Abbottabad and will successfully pass the examination / training. In case he avoided undergoing training (on home leave for training) under the shelter of any reason i.e. medical illness, domestic affairs or political influence etc. he will automatically be terminated from service. In case he failed to successfully pass Forester training / examination he will be removed from service soon after declaration of result.
- v. Initially, he will remain on probation of (2) two years subject to continuation of post extendable up to four years and his services will be terminated at any time without assigning any notice if his performance or conduct is found unsatisfactory during the probation period and extended probation period.
- vi. He will be governed by the relevant KP (Government Servants) Civil Servants Act 1973, KP Government Servants (Efficiency & Discipline) Rules 2011, KP Government servants Removal from service Special Powers Ordinance 2002 and all other relevant Rules applicable to KP Civil servants and framed by the Government of KP from time to time.
- vii. He will have to produce medical fitness certificate from Medical Superintendent District Teaching Hospital D.I.Khan with in (10) ten days from the date of joining his services.

D-13

- viii. He will be removed from service if his antecedents are found unsatisfactory after verification from the District Police Officer, D.I.Khan.
- ix. He will have to tender one month notice for resignation as and when he desire to leave Forest Department else in lieu of that he will have to deposit one month pay in advance.
- x. As long as he will on the effective strength of D.I.Khan Forest Division, he can be posted / transferred/adjusted anywhere throughout territorial jurisdiction of D.I.Khan Forest Division or Southern Circle or Province.

If he accepts the post on the terms and conditions mentioned above, he should report himself for duty within (10) ten days and will produce original certificates in connection with his qualification and domicile etc.

*[Signature]*  
 (MUSA KHAN BAEQI)  
 DIVISIONAL FOREST OFFICER  
 D.I.KHAN FOREST DIVISION  
 D.I.KHAN

5038-40 IG

Copy forwarded for information to:

The Conservator of Forests, Southern Circle Peshawar.  
 Muhammad Asif Khan S/O Muhammad Ismail Khan resident of Mohallah  
 Ibrahim Khel Village and Post Office Gullinam Tehsil & District Tank  
 Accountant Divisional office, D.I.Khan Forest Division D.I.Khan.

*[Signature]*  
 DIVISIONAL FOREST OFFICER  
 D.I.KHAN FOREST DIVISION  
 D.I.KHAN

FINAL SENIORITY LIST OF FORESTERS (BFS-10) IN RESPECT OF SOUTHERN FOREST CIRCLE AT BANGALURU  
 STOOD ON 13/12/2022

Sr	Name of Forester	Qualification	Date of Birth with domicile	Date of Entry into Govt Service	Regular Appointment/Promotion to the present post.			Method of Recruitment / Appointment	Trained / Un-Trained	Parent Service
					Date	BFS	10			
1	Kam Ullah	M.A	01/04/1964	06/01/1988	10	Direct	Un-Trained	D.Khan	10	
2	Ahmad Ahmed	M.A	03-01-1969 D.Khan	31/08/1989	10	Direct	Trained	D.Khan	10	
3	Muhammad Farooq-	M.A	20/02/1967	21/06/1990	10	Direct	Trained	D.Khan	10	
4	Nageeb Ullah	B.A	02/02/1970 LAKKI	25/09/1990	10	Direct	Trained	Bannu	10	
5	Shaukat Hayer	B.A	06/01/1973 LAKKI	13/10/1990	10	Direct	Trained	Bannu	10	
6	Nasir Ullah	F.A	01/07/1969 Bannu	19/12/1990	10	Direct	Trained	Bannu	10	
7	Ahmad Ullah	B.Sc	13/07/1965 FR Bannu	22/09/1990	10	Direct	Trained	North Waziristan	10	
8	Shahid Ullah	M.A	01/02/1971 FR Bannu	03/05/1992	10	Direct	Trained	North Waziristan	10	
9	Nasir Muhammad	B.A	21.11.1970 South Waziristan	30/04/1992	10	Direct	Trained	South Waziristan	10	
10	Syed Muhammad Dawood Shah	B.A	25/04/1969 South Waziristan	30/04/1993	10	Direct	Trained	South Waziristan	10	
11	Muhammad Ishaq Shah	M.A	15/03/1971 South Waziristan	03/11/1994	10	By Promotion	Trained	South Waziristan	10	
12	Ishaq Ullah	M.A	07/05/1976 North Waziristan	20/06/1996	10	Direct	Trained	North Waziristan	10	
13	Ishaq Ullah Wazir	F.A	06/02/1979 North Waziristan	20/06/1996	10	Direct	Trained	North Waziristan	10	
14	Muhammad Idris	B.A	15/03/1968	19/12/1996	10	Direct	Trained	D.Khan	10	

E-14



E-15

Sl. No.	Name of Forester	Qualification	Date of Birth with Domicile	Date of Entry into Govt. Service	Regular Appointment / Promotion to the present post.			Trained / Un-Trained	Forest Division
					Date	BPS	Method of Recruitment / Appointment		
15	Muhammad Arif	B.A.	30/06/1966 North Waziristan	03/01/1994	31/12/1998	10	Direct	Trained	North Waziristan
16	Zar Gulfa Jan	B.Sc.	21/04/1968 North Waziristan	03/11/1994	01/07/2000	10	Direct	Trained	North Waziristan
17	Muhammad Khalid Alan Shah	Matric	22/11/1968 South Waziristan	25/06/1996	01/07/2000	10	Direct	Un-Trained	South Waziristan
18	Mir Sahib Khan	F.A.	15/05/1972 South Waziristan	14/03/1996	01/07/2000	10	Direct	Trained	South Waziristan
19	Laiq Shah	Matric	20/05/1972 South Waziristan	20/06/1996	01/07/2000	10	Direct	Trained	North Waziristan
20	Ibrahim Abdullah	F.A.	06/04/1973 North Waziristan	20/06/1996	01/07/2000	10	Direct	Trained	North Waziristan
21	Hidayat Ullah	Matric	14/08/1975 FR Bannu	20/06/1996	01/07/2000	10	Direct	Trained	D.I.Khan
22	Kaleem Ullah	Matric	18/03/1975 D.I.Khan	21/11/2006	21/11/2006	10	Direct	Trained	D.I.Khan
23	Muhammad Iqbal-II	F.Sc	20/06/1975 D.I.Khan	21/11/2006	21/11/2006	10	Direct	Trained	D.I.Khan
24	Lal Khan	F.Sc	15/01/1937 D.I.Khan	23/11/2006	23/11/2006	10	Direct	Trained	Bannu
25	Dinar	Matric	03/01/1980 Lakki Marwat	18/01/2007	18/01/2007	10	Direct	Trained	D.I.Khan
26	Qaiser Abbas	F.A.	04/01/1976 D.I.Khan	10/10/2009	10/10/2009	10	Direct	Un-Trained	D.I.Khan
27	Abou Tawab	M.A.	09/11/1963 D.I.Khan	01/02/2010	01/02/2010	10	Direct	Un-Trained	South Waziristan
28	Noor Muhammad	Matric	15/01/1969 D.I.Khan	13/03/1983	06/01/2011	10	By Promotion	Trained	North Waziristan
29	Iffat Ullah	B.A.	07/04/1983 North Waziristan	23/05/2012	23/05/2012	10	Direct	Un-Trained	South Waziristan
30	Aminullah	F.A.	15/10/1964 South Waziristan	07/04/1983	28/05/2013	10	By Promotion	Un-Trained	South Waziristan

S#	Name of Forester	Qualification	Date of Birth with Domicile	Date of Entry into Govt. Service	Regular Appointment / Promotion to the present post.			Trained / Un-Trained	Forest Division
					Date	BPS	Method of Recruitment / Appointment		
31	Zulfiqar Ali Shah	Matric	04/03/1965 South Waziristan	16/12/1989	25/03/2015	10	By Promotion	Un-Trained	South Waziristan
32	Qismat Khan	Matric	01/01/1965 Tank	21/01/1990	01/03/2015	10	By Promotion	Un-Trained	South Waziristan
33	Tanveer Ahmad	MBA	01/08/1989 Lakki Marwat	07/02/2017	07/02/2017	10	Direct	Trained	Bannu
34	Saddam Ullah	MBA	14/07/1991 Bannu	07/02/2017	07/02/2017	10	Direct	Trained	Bannu
35	Asif Khan	BS (Hon's)	06/05/1992 D.I.Khan	24/03/2017	24/03/2017	10	Direct	Un-Trained	D.I.Khan
36	Munawar Khan	Matric	03/02/1963 Bannu	05/09/1984	09/10/2013	10	By Promotion	Un-Trained	Bannu
37	Mumtaz Khan	Matric	04/04/1965 FR Lakki Marwat	08/10/1985	28/02/2019	10	By Promotion	Un-Trained	North Waziristan
38	Muhammad Imran	M.Com	13/01/1985 D.I.Khan	24/04/2019	24/04/2019	10	Direct	Un-Trained	D.I.Khan
39	Arif Ullah	Matric	10/04/1984 Lakki Marwat	01/03/1987	28/05/2019	10	By Promotion	Un-Trained	Bannu
40	Muhammad Din	Matric	15/03/1968	31/07/1990	28/05/2019	10	By Promotion	Un-Trained	Bannu
41	Noor Zada	Matric	01/01/1968 South Waziristan	01/02/1990	01/01/2020	10	By Promotion	Un-Trained	South Waziristan
42	Mehr Khan	Matric	08/01/1969 Tribal Sub Division Tank	23/01/1990	01/01/2020	10	By Promotion	Un-Trained	South Waziristan
43	Din Muhammad	Matric	13/03/1970 South Waziristan	07/02/1990	01/01/2020	10	By Promotion	Un-Trained	South Waziristan
44	Anwar Saeed	Matric	10/12/1971 South Waziristan	27/12/1989	01/01/2020	10	By Promotion	Un-Trained	South Waziristan
45	Baitullah	F.A	10/01/1972 Tribal Sub Division Bannu	25/09/1990	01/01/2020	10	By Promotion	Un-Trained	South Waziristan
46	Shahid Ullah	M.A	02/09/1969 FR Bannu	17/09/1990	01/12/2020	10	By Promotion	Un-Trained	North Waziristan
47	Hamid Ullah Jan	Matric	07/04/1971 North Waziristan	17/09/1990	01/12/2020	10	By Promotion	Un-Trained	North Waziristan
48	Munir Ahmad	Matric	25/10/1964 Bannu	01/03/1987	15/03/2021	10	By Promotion	Un-Trained	Bannu

#	Name of Forester	Qualification	Date of Birth with Domicile	Date of Entry into Govt. Service	Regular Appointment / Promotion to the present post.			Trained / Un-Trained	Forest Division
					Date	BPS	Method of Recruitment / Appointment		
49	Dilawar Khan	Matric	01/09/1970 Bannu	26/08/1990	15/03/2021	10	By Promotion	Un-Trained	Bannu
50	Muhammad Iqbal	BA	15/03/1971 Lakki Marwat	31/07/1990	15/03/2021	10	By Promotion	Un-Trained	Bannu
51	Farman Ali Shah	Matric	01/03/1972 Bannu	04/08/1990	15/03/2021	10	By Promotion	Un-Trained	Bannu
52	Ismail Khan	BA	10/02/1964 Bannu	01/05/1983	29/03/2022	10	By Promotion	Un-Trained	Bannu
53	Sher Alam	FA	11/04/1969 Bannu	08/07/1993	29/03/2022	10	By Promotion	Un-Trained	Bannu
54	Rashid Ullah	Matric	09/05/1975 Bannu	23/01/1996	29/03/2022	10	By Promotion	Un-Trained	Bannu
55	Saudad Khan	MA	19/11/1975 Bannu	31/05/2004	29/03/2022	10	By Promotion	Un-Trained	Bannu
56	Muhammad Jabbar	MA	03/02/1982 Bannu	31/05/2004	29/03/2022	10	By Promotion	Un-Trained	Bannu
57	Tehseen Amjad	Matric	28/02/1965 D.I.Khan	04/12/1985	08/04/2022	10	By Promotion	Trained	D.I.Khan
58	Hameed Ullah	Matric	08/01/1967 D.I.Khan	14/11/1987	08/04/2022	10	By Promotion	Trained	D.I.Khan
59	Habib Ullah	Matric	01/09/1968 D.I.Khan	14/11/1987	08/04/2022	10	By Promotion	Trained	D.I.Khan
60	Muhammad Jan	Matric	21/11/1958 D.I.Khan	29/02/1983	08/04/2022	10	By Promotion	Trained	D.I.Khan
61	Qayyum Nawaz	Matric	05/09/1969 D.I.Khan	01/03/1988	08/04/2022	10	By Promotion	Trained	D.I.Khan
62	Waris Khan	B.A	10/04/1966 North Waziristan	25/09/1995	19/04/2022	10	By Promotion	Untrained	North Waziristan
63	Farid Ullah	Matric	15/06/1967 FR Bannu	19/03/1994	19/04/2022	10	By Promotion	Untrained	North Waziristan
64	Zair Ullah	B.A	15/04/1983 FR Bannu	25/04/1991	19/04/2022	10	By Promotion	Untrained	North Waziristan
65	Muhammad Shahid	M.A	23/08/1968 North Waziristan	25/09/1995	19/04/2022	10	By Promotion	Untrained	North Waziristan
66	Shahidar Khan	Matric	07/03/1969 North Waziristan	19/03/1994	19/04/2022	10	By Promotion	Untrained	North Waziristan
67	Mainullah	B.A	01/05/1969 FR Bannu	25/09/1995	19/04/2022	10	By Promotion	Untrained	North Waziristan

5-18

Name of Forester	Qualification	Date of Birth with Domicile	Date of Entry into Govt. Service	Regular Appointment / Promotion to the present post.			Trained / Un-Trained	Forest Division
				Date	BPS	Method of Recruitment / Appointment		
Jan Bahadar	F.A	10/09/1969 North Waziristan	15/06/1996	19/04/2022	10	By Promotion	Untrained	North Waziristan
Atta Ullah	F.A	27/03/1971 North Waziristan	25/09/1995	19/04/2022	10	By Promotion	Untrained	North Waziristan
Muhammad Farooq	F.A	07/04/1971 North Waziristan	03/11/1994	19/04/2022	10	By Promotion	Untrained	North Waziristan
Noor Zahid Din	Matric	19/09/1971 North Waziristan	16/05/1992	19/04/2022	10	By Promotion	Untrained	North Waziristan
Muhammad Amir	F.A	06/05/1972 FR Bannu	03/11/1994	19/04/2022	10	By Promotion	Untrained	North Waziristan
Tikka Khan	B.A	15/02/1973 FR Bannu	25/04/1991	19/04/2022	10	By Promotion	Untrained	North Waziristan
Mir Kamali Khan	Matric	11/04/1973 North Waziristan	25/09/1995	19/04/2022	10	By Promotion	Untrained	North Waziristan
Noor Alam	Matric	01-12-1967/South Waziristan	16/11/1994	30/05/2022	10	By Promotion	Trained	South Waziristan
Akhtar Muhammad	Matric	20-04-1968/South Waziristan	02/04/1994	30/05/2022	10	By Promotion	Trained	South Waziristan
Muhammad Riaz Shah	Matric	05-07-1968/South Waziristan	26/5/1992	30/05/2022	10	By Promotion	Trained	South Waziristan
Syed Amanullah Shah	Matric	03-01-1970/South Waziristan	09/07/1996	30/05/2022	10	By Promotion	Trained	South Waziristan
Habib-Ur-Rehman	Matric	20-10-1971/South Waziristan	28/03/1993	30/05/2022	10	By Promotion	Trained	South Waziristan
Shehzad Alam	Matric	10-05-1972/South Waziristan	01/10/1995	30/05/2022	10	By Promotion	Trained	South Waziristan
Muhammad Ajmal	Matric	03-01-1973 Tribal Sub Division D.I.Khan	06/11/1994	30/05/2022	10	By Promotion	Trained	South Waziristan
Zain-Ud-Din Shah	F.A	10-07-1973/South Waziristan	19/11/1992	30/05/2022	10	By Promotion	Trained	South Waziristan

S#	Name of Forester	Qualification	Date of Birth with Domicile	Date of Entry Into Govt. Service	Regular Appointment / Promotion to the present post.			Trained / Un-Trained	Forest Division
					Date	BPS	Method of Recruitment / Appointment		
83	Ahmad Khan	Matric	19-09-1973/ Tribal Sub Division Tank	9/3/1993	30/05/2022	10	By Promotion	Trained	South Waziristan
84	Falak Sher	Matric	12-04-1974/South Waziristan	23/06/1996	30/05/2022	10	By Promotion	Trained	South Waziristan
85	Noor-Ul-Ameen	Matric	10-06-1974/ Tribal Sub Division D.I.Khan	27/06/1996	30/05/2022	10	By Promotion	Trained	South Waziristan
86	Jamshed Khan	Matric	20-03-1975/South Waziristan	10/03/1993	30/05/2022	10	By Promotion	Trained	South Waziristan
87	Manzoor Khan	Matric	01-07-1975/South Waziristan	01/10/1995	30/05/2022	10	By Promotion	Trained	South Waziristan
88	FatehUllah	Matric	20-10-1975/South Waziristan	04/09/1995	30/05/2022	10	By Promotion	Trained	South Waziristan
89	Maroof Din	Matric	22-03-1976/ Tribal Sub Division D.I.Khan	23/06/1996	30/05/2022	10	By Promotion	Trained	South Waziristan
90	Syed Sajjad Shah	FA	13-04-1976/South Waziristan	18/02/1996	30/05/2022	10	By Promotion	Trained	South Waziristan
91	Rehmat Ullah	Matric	06-06-1976/South Waziristan	08/03/1994	30/05/2022	10	By Promotion	Trained	South Waziristan
92	Aba Ullah	BA/ CIM	10/04/1984 Bannu	31/05/2004	27/06/2022	10	By Promotion	Untrained	Bannu
93	Inamullah Khan	Matric	01/03/1985 Lakki Marwat	06/09/2008	27/06/2022	10	By Promotion	Untrained	Bannu
94	Aba Muhammad	FA	03/01/1984 D.I.Khan	14/09/1982	16/09/2022	10	By Promotion	Trained	D.I.Khan
95	Sheer Zaman	FA	03/03/1984 D.I.Khan	24/04/1983	16/09/2022	10	By Promotion	Trained	D.I.Khan
96	Abdul Malik	Matric	11/02/1986 D.I.Khan	06/03/1983	16/09/2022	10	By Promotion	Trained	D.I.Khan
97	Mirza Abub	Matric	19/02/1986 D.I.Khan	02/03/1985	16/09/2022	10	By Promotion	Trained	D.I.Khan

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Sr	Name of Forester	Qualification	Date of Birth with Domicile	Date of Entry into Govt. Service	Regular Appointment / Promotion to the present post.			Trained / Un-Trained	Forest Division
					Date	BPS	Method of Recruitment / Appointment		
99	Muhammad Rafiq	Matric	21/04/1966 D.I.Khan	16/12/1989	16/09/2022	10	By Promotion	Trained	D.I.Khan
100	Moula Dad	Matric	10/09/1969 D.I.Khan	05/03/1988	16/09/2022	10	By Promotion	Trained	D.I.Khan

No. 176-80 /Estt Dated 14/12/2022

Copy forward for information to the:

1. Chief Conservator of Forests, Central Southern Forest Region-I, Peshawar with reference to this office order No.01 dated 05-12 endorsed vide Endst: No. 84-89/G of even dated
2. Divisional Forest Officer Bannu Forest Division at Bannu
3. Divisional Forest Officer D.I.Khan Forest Division at D.I.Khan
4. Divisional Forest Officer South Waziristan Forest Division at Tank
5. Divisional Forest Officer North Waziristan Forest Division at Bannu Township

Conservator of Forests  
Southern Forest Circle  
Bannu

*[Handwritten Signature]*

12-1-2023  
733

F-21

Consequent upon request from Conservator of Forests Range Management Circle Peshawar vide his letter No. 36/E, dated 23/08/2023 regarding non-availability /appointment of requisite Forest staff and consequent willingness shown by Forester concerned, communicated through Conservator of Forests Southern Forest Circle Bannu, Muhammad Asif Khan, Forester presently posted as Incharge SDFO Wanna is hereby posted in Range Management Circle (Region-I) in the interest of public service with immediate effect.


Consequent upon his transfer, the Inter-se-seniority of Muhammad Asif Khan Forester shall be maintained in Range Management Circle.

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

No. 1492-94 IE.

Copy forwarded for information and necessary action to the:-

1. Conservator of Forests Range Management Circle Peshawar with reference to his letter cited above.
2. Conservator of Forests Southern Forest Circle Bannu
3. Divisional Forest Officer South Waziristan Forest Division Tank

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

OFFICE ORDER NO. 188 DATED PESHAWAR THE 14/05/2024 ISSUED BY  
FAZAL ILLAHI, CHIEF CONSERVATOR OF FORESTS CENTRAL SOUTHERN FOREST  
REGION-I, KHYBER PAKHTUNKHWA PESHAWAR.

9-22

On the recommendations of Departmental Promotion Committee, the following Foresters (BPS-10) are hereby promoted to the post of Deputy Ranger (BPS-12) on regular basis with immediate effect as per approved minutes of DPC meeting held on 03/05/2024:-

S.#	Name of Foresters	Name of Circle
1.	Syed Ibrar Hussain Shah	Forestry Planning & Monitoring Circle Peshawar
2.	Muhammad Ishaq	
3.	Mr. Aziz Ahmad	Central Forest Circle Peshawar
4.	Mr. Shah Khalid	
5.	Mr. Noor Muhammad-I	
6.	Mr. Sadique Ullah	
7.	Muhammad Asif Khan	Range Management Circle Peshawar
8.	Muhammad Zada	Malakand East Forest Circle
9.	Mr. Liaqat Ali-I	
10.	Mr. Toti Rehman	
11.	Muhammad Zubair	
12.	Mr. Arshad Ali Khan	Lower Hazara Forest Circle Abbottabad
13.	Mr. Ishfaq Ahmad	
14.	Mr. Zafeer Ahmad	Malakand West Forest Circle
15.	Mr. Rehman Salih	
16.	Mr. Irshad Ullah	
17.	Mr. Muzaffar Khan	
18.	Mr. Zahoor Ahmad	Watershed Forest Circle Abbt;
19.	Rashid Ullah	Southern Forst Circle Bannu
20.	Shakir Ullah	
21.	Naik Muhammad	
22.	Syed Zulfiqar Ali Shah	
23.	Mr. Amjad Ali	Kohat Forest Circle Peshawar
24.	Noor Ahmad	

This order is purely temporary and will not constitute any right for continuity in case of abolition of the post. In such an eventuality they will automatically stand reverted to original post without any notice.

They will remain on probation for a period of one year extendable for another one year in terms of Section-6 (2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rules 15 (1) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989.

Their posting order will be issued separately.

Sd/-

(Fazal Illahi)

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

No. 5983-94 IE

Copy forwarded for information and necessary action to the:-

1. Chief Conservator of Forests Northern Region-II, Abbottabad
2. Chief Conservator of Forests Malakand Forest Region-III, Saidu Sharif Swat
3. Conservator of Forests Forestry Planning & Monitoring Circle Peshawar
4. Conservator of Forests Central Forest Circle Peshawar
5. Conservator of Forests Range Management Circle Peshawar
6. Conservator of Forests Malakand East Forest Circle Saidu Sharif Swat
7. Conservator of Forests Lower Hazara Forest Circle Abbottabad
8. Conservator of Forests Malakand West Forest Circle Timergara
9. Conservator of Forests Watershed Circle Abbottabad
10. Conservator of Forests Southern Forest Circle Bannu
11. Conservator of Forests Kohat Forest Circle at Peshawar
12. Section Officer (Establishment) Govt. of Khyber Pakhtunkhwa Climate Change, Forestry, Environment & Wildlife Department Peshawar

Chief Conservator of Forests  
Central Southern Forest Region-I



(H-23)

To,

THE SECRETARY,  
Environment, Khyber Pakhtunkhwa Peshawar

Through: Proper Channel

Subject: DEPARTMENTAL APPEAL/ REPRESENTATION AGAINST THE ORDER DATED 14.05.2024, ISSUED BY CHIEF CONSERVATOR OF FOREST (CENTRAL SOUTHERN REGION-I), VIDE WHICH ONE MUHAMMAD ASIF KHAN FORESTER BPS-10 HAS BEEN PROMOTED TO THE POST OF DEPUTY RANGER BPS-12, WHO IS JUNIOR TO THE APPELLANT AND HAS ILLEGALLY BEEN PROMOTED

Respected Sir,

That the applicant humbly submits as under:

1. That the appellant was initially appointed in a project vide order dated 14.03.1998 as forester at forestry sector project Peshawar. Copy of order is enclosed herewith.
2. That the appellant was appointed as forester vide order 09<sup>th</sup> October 2009 in D.I.Khan forest division. Copy of order is enclosed herewith.
3. That as the services of almost all the employees were regularized, who were already working on contract / temporary basis, therefore, the appellant filed a writ petition, which was allowed and thereafter, the services of the appellant was adjusted as forester from 22<sup>nd</sup> November 2006 vide order dated 02.04.2023. Copy enclosed herewith.
4. That one Muhammad Asif Khan was appointed as forester vide order dated 24<sup>th</sup> march 2017 at D.I.Khan forest Division. Copy enclosed herewith.
5. That the department issued seniority list of the foresters BPS-10 of Bannu Circle on 13.12.2022, wherein the name of the appellant appears at serial No.26, whereas the said Muhammad Asif Khan is at serial

Kalim

31-5-2024

(124)

No.35 and it is pertinent to mention here that in the relevant column he has been shown as untrained. Copy of seniority list enclosed herewith.

6. That the said Muhammad Asif Khan got himself transferred vide order dated 07.09.2023 to Range Management Circle Peshawar. Copy of order enclosed herewith.
7. That astonishingly the Chief conservator of forest central southern forest region-I Khyber Pakhtunkhwa Peshawar vide order dated 14.05.2024 promoted as many as 24 foresters BPS-10 to deputy Ranger BPS-12, wherein the name of Muhammad Asif Khan is mentioned at Serial No.7 who was initially appointed in Bannu Circle and it is evident from his appointment order that he has been appointed in the year 2017 in Bannu Circle, which promotion order dated 14.05.2024 is totally illegal against the rules and the violation of service laws. Copy of impugned order is enclosed herewith.
8. That being aggrieved, the appellant is preferring instant departmental appeal / representation inter alia the following grounds.

#### GROUNDS

- A. That the impugned promotion order in violate of the service laws and the said Muhammad Asif Khan managed all the transfer orders and subsequent promotion in league with superiors of the department, whereas it is evident from the seniority list that he was placed at serial No.35, whereas the appellant is at serial No.26, keeping in view the initial orders.
- B. That it is also evident from the notification dated 05<sup>th</sup> October 2012 by referring the powers vested in the competent authority of the item 1-6 part -1 of defunct West Pakistan, Manual volume-II; for the purpose of initial appointment of

H-25

forester and promotion of forester to the rank of deputy rangers, in each circle on the basis of circle wise seniority list of the foresters, which are as under.

- i. Upper Hazara Circle
- ii. Lower Hazara Circle
- iii. Malakand west Circle
- iv. Malakand east Circle
- v. FATA circle
- vi. Southern Circle (now Kohat, Bannu and Peshawar Circle)
- vii. Water shad management circle
- viii. Forestry planning and monitory circle

It is pertinent to mention here that in the same notification it has specifically been highlighted that, "the seniority of the foresters and deputy rangers shall be determine and fixed in the respective circles on the basis of their initial appointment".

It is pertinent to mention here that the said Muhammad Asif Khan was appointed in Bannu circle and that is why in the seniority list prepared in the year 2022 his name is appearing in the said list but in clear violation of this notification dated 05<sup>th</sup> October 2012, the said Muhammad Asif Khan has been promoted to deputy Ranger by ignoring his initial appointment at Bannu circle. Copy of notification is enclosed herewith.

- C. It is also pertinent to mention here that the said Muhammad Asif Khan managed his transfer and promotion through backdoor, as if at all after creation of new circle, instead of fresh appointment, the senior most foresters and other employees were required to be transferred to the newly established circle then in Bannu circle the petitioner should have been transferred to range Management

circle but the said Muhammad Asif Khan was transferred and got promoted because he once again managed his promotion by bypassing the senior most foresters in the said circle. It is pertinent to mention here that one Siddique Akbar forester was transferred to the range management circle on 28.02.2024 and one Arshad Ali forester was also transferred to Range Management circle from Unit-IV Mangora Swat vide order dated 24.04.2024, both of them are senior to the said Muhammad Asif Khan as transferred prior to the said Muhammad Asif Khan to the newly created circle Range Management circle. Copies of transfer orders are enclosed herewith.

D. That if at all the said Muhammad Asif Khan was required to be promoted then why once again the seniority list of Range Management circle was violated.

E. That it is pertinent to mention here that although said Muhammad Asif Khan managed his transfer from Bannu circle to Range management circle in documents but infact he also managed order dated 20.02.2024, whereby he never went to Peshawar rather he was posted and adjusted as SDFO D.I.Khan (Bannu circle) as stop gap arrangement and then after promotion he remained on the same post till date and he also managed another order, whereby after getting promotion he was directed to work at D.I.Khan division (Bannu Circle), meaning thereby in the documents he has been transfer to Peshawar but practically he never went to Peshawar and remained at D.I.Khan division. Copies of the orders are enclosed herewith.

F. That it is pertinent to mention here that in the appointment order it is clearly mentioned that the forester BPS-10 must undergo the compulsory training and to pass the exam for one year and in case of failure or avoid to undergo training, he should be removed from service soon after declaration of result but the

said Muhammad Asif Khan never undergone the one year training nor has passed the said training as required by the terms and condition No.IV of the appointment order, whereas the appellant did passed the said training well within time as mentioned in the terms and conditions, within the probation period, therefore, the said Muhammad Asif Khan was not only eligible for promotion but was required to have been removed from service under the condition mentioned above.

G. That keeping in view the notification dated 05 October 2012, in Bannu Circle D.I.Khan division the appellant is the senior most forester and he should have been promoted instead of said Muhammad Asif Khan.

H. That the appellant wishes to be heard in person to clarify the entire situation before your goodself.

It is therefore requested that the promotion order of Muhammad Asif Khan dated 07.09.2023 may be declared against the law and ineffective upon the rights of appellant and the appellant may be promoted to the post of deputy ranger BPS-12 from the date, when the said Muhammad Asif Khan was promoted with all back benefits.

Thanking you in anticipation,

Your humble appellant



(Qaisar Abbas Khan)  
Forester,  
D.I.Khan forest Division,  
Bannu Forest circle.

Dated: 30.05.2024

H 27-1

**Amin-Ul-Islam**  
Divisional Forest Officer  
D.I.Khan Forest Division

Bungalow No. 29 - Allama Iqbal  
Road D.I.Khan Cantt.  
Phone No. 0966-9280181



Dated D.I.Khan the **31** / May / 2024

The Conservator of Forests,  
Southern Forest Circle  
Hannu.

8337

OBJE:

DEPARTMENTAL APPEAL/REPRESENTATION GAINST THE ORDER DATED 14-05-2024 ISSUED BY CHIEF CONSERVATOR OF FOREST CENTRAL SOUTHERN REGION-I VIDE WHICH ONE MUHAMMAD ASIF KHAN FORESTER BPS-10 HAS BEEN PROMOTED TO THE POST OF DEPUTY RANGER BPS-12 WHO IS JUNIOR TO THE APPELLANT AND HAS ILLEGALLY BEEN PROMOTED.


Enclosed please find herewith the Appeal of Mr. Qaiser Abbas Forester (in  
ad) for the favour of information and further necessary action,

Above.

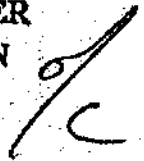
8338

/R.

Copy forwarded to Mr. Qaiser Abbas Forester for information.

  
DIVISIONAL FOREST OFFICER  
D.I.KHAN FOREST DIVISION  
D.I. KHAN

  
DIVISIONAL FOREST OFFICER  
D.I.KHAN FOREST DIVISION  
D.I. KHAN







GOVERNMENT OF KHYBER PAKHTUNKHWA  
ENVIRONMENT DEPARTMENT

Dated Pesh 5<sup>th</sup> Oct., 2012

I-28

B-XII-4/CAI  
h

**NOTIFICATION**

No. SO(Estt)Env/I-4/2k11: In supersession of this department Notification No. SO(Estt)Env/I-4/2k11/6475 dated 2/1/2012, the Competent Authority, in exercise of the powers vested vide Item 1-6 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 circle-wise 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/I-4/2k11

1629-50

Dated Pesh: 5<sup>th</sup> 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, Mingora 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 months time period; if found no 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.

D-No. 1030

11/10/12 512 400

11/12

Sent to: All offl  
Director 160  
for information and  
no. P. 1 11 20

(ASHFAQ KHAN)  
SECTION OFFICER (EST)

J-29

OFFICE ORDER NO. 154 DATED PESHAWAR THE 28 /02/2024 ISSUED  
BY SYED MUQTADA SHAH, CHIEF CONSERVATOR OF FORESTS CENTRAL  
SOUTHERN FOREST REGION-I, KHYBER PAKHTUNKHWA PESHAWAR.


As requested by Conservator of Forests Range Management Circle Peshawar vide letter No. 36/E, RM, dated 23/08/2023 and recommended by Conservator of Forests Central Forest Circle Peshawar vide letter No. 3246/E, dated 28/02/2024 and willingness shown by Forester, Mr. Saddique Akber Forester is hereby transferred from Bajaur Forest Division to Range Management Circle Peshawar in the interest of public service with immediate effect.

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

No. 4854-57 IE.

Copy forwarded for information and necessary action to the:-

1. Conservator of Forests Central Forest Circle Peshawar
2. Conservator of Forests Range Management Circle Peshawar
3. Divisional Forest Officer Bajaur Forest Division
4. Regional Accountant Head Office Peshawar

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



OFFICE ORDER NO. 187 DATED PESHAWAR THE 24 /04/2024 ISSUED  
BY MR. FAZAL ILLAHI, CHIEF CONSERVATOR OF FORESTS CENTRAL SOUTHERN  
FOREST REGION-I, KHYBER PAKHTUNKHWA PESHAWAR.

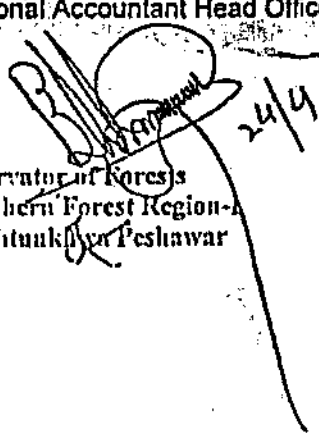
As requested by Conservator of Forests Range Management Circle Peshawar vide letter No. 36/E.RM, dated 23/08/2023 and willingness shown by Forester, Mr. Arshad Ali Forester is hereby transferred from Working Plan Unit-VI Mingora Swat to Range Management Circle Peshawar in the interest of public service with immediate effect. The seniority of the Forester concerned for the purpose of promotion to the post of Deputy Ranger will be maintained in Forestry Planning and Monitoring Circle Peshawar as per issued notification bearing No. SO(EsII)/Env/1-4/2k11, dated 05/10/2012 by the Administrative Department.

Sd/-  
(Fazal Illahi)  
Chief Conservator of Forests  
Central Southern Forest Region-I  
Khyber Pakhtunkhwa Peshawar

No. 5706-08 /E, B-11-7

Copy forwarded for information and necessary action to the:-

1. Conservator of Forests Forestry Planning & Monitoring Circle Peshawar
2. Conservator of Forests Range Management Circle Peshawar
3. Regional Accountant Head Office Peshawar

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

K-31

OFFICE ORDER NO. 152 DATED PESHAWAR THE 20 /02/2024 ISSUED BY SYED MUQTADA SHAH, CHIEF CONSERVATOR OF FORESTS CENTRAL SOUTHERN FOREST REGION-I, KHYBER PAKHTUNKHWA PESHAWAR.

Muhammad Asif Khan Forester is hereby transferred from Range Management Circle Peshawar and posted as SDFO D.I.Khan relieving Mr. Abdul Tawab Forester from the additional charge of D.I.Khan Forest Sub Division as stopgap arrangement till further orders in the interest of public service with immediate effect.

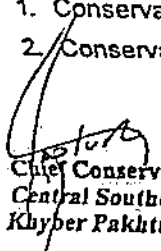
His Inter-se-seniority will be maintained as provided in this office order No. 42, dated 07/09/2023.

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

No. 4692-93 /E.

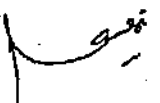
Copy forwarded for information and necessary action to the:-

- 1. Conservator of Forests Range Management Circle Peshawar
- 2. Conservator of Forests Southern Forest Circle Bannu

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

No. 1232 /Estt: Dated: 21 /02/2024

Copy of the above is forwarded to Divisional Forest Officer D.I Khan Forest Division for information and necessary action.

  
Conservator of Forests  
Southern Forest Circle  
Bannu

OFFICE ORDER NO. 201 DATED PESHAWAR THE 22/10/2024  
 ISSUED BY FAZAL ILLAHI, CHIEF CONSERVATOR OF FORESTS CENTRAL  
 SOUTHERN FOREST REGION-I, KHYBER PAKHTUNKHWA PESHAWAR.

(K32)

Consequent to promotion/appointment to the post of Deputy Ranger (BS-12) already made vide this office order No. 188 & 189, dated 14/5/2024, the following posting/transfer amongst the newly promoted/appointed Deputy Rangers are hereby made in the interest of public service with immediate effect:-

S.#	Name of Deputy Ranger	Place of Posting
1.	Syed Ibrar Hussain shah	To actualize his promotion on the post of Deputy Ranger in Forestry Planning & Monitoring Circle Peshawar for one day and then to continue as Incharge Aljai Forest Sub Division of Hazara Tribal Forest Division Battagram.
2.	Muhammad Ishaq	Forestry Planning & Monitoring Circle Peshawar
3.	Mr. Aziz Ahmad	Forestry Planning & Monitoring Circle Peshawar
4.	Mr. Shah Khalid	To actualize his promotion on the post of Deputy Ranger in Patrol Squad Division Central Forest Circle Peshawar for one day and then to continue as Incharge Charsadda Forest Sub Division of Peshawar Forest Division.
5.	Mr. Noor Muhammad-I	Mardan Forest Division against the vacant post of Deputy Ranger.
6.	Mr. Sadique Ullah	Khyber Forest Division against the vacant post of Deputy Ranger for one day actualization.
7.	Muhammad Asif Khan	To actualize his promotion on the post of Deputy Ranger in Range Management Circle for one day and then to continue as Incharge D.I.Khan Forest Sub Division of D.I.Khan Forest Division.
8.	Muhammad Zada	Buner Forest Division against the vacant post of Deputy Ranger
9.	Mr. Toti Rehman	Kalam Forest Division against the vacant post of Deputy Ranger
10.	Muhammad Zubair	Alpuri Forest Division against the vacant post of Deputy Ranger
11.	Mr. Arshad Ali Khan	Upper Swat Forest Division against the vacant post of Deputy Ranger
12.	Mr. Ishliaq Ahmad	Kaghan Forest Division against the vacant post of Deputy Ranger
13.	Mr. Zafeer Ahmad	Sirah Forest Division against the vacant post of Deputy Ranger
14.	Mr. Rehman Saif	Patrol Squad Malakand West Timergara against the vacant post of Deputy Ranger
15.	Mr. Irshad Ullah	Upper Dir Forest Division against the vacant post of Deputy Ranger
16.	Mr. Muzaffar Khan	Chitral Forest Division against the vacant post of Deputy Ranger
17.	Mr. Zahoor Ahmad	To actualize his promotion on the post of Deputy Ranger in Buner Watershed Division for one day and then to continue as Incharge Sherghar Forest Sub Division of Agror Tanawal Forest Division.
18.	Rashid Ullah	Bannu Forest Division against the vacant post of Deputy Ranger
19.	Shakir Ullah	Bannu Forest Division against the vacant post of Deputy Ranger
20.	Naik Muhammad	D.I.Khan Forest Division against the vacant post of Deputy Ranger
21.	Syed Zulfiqar Ali Shah	Kohat Forest Division against the vacant post of Deputy Ranger
22.	Mr. Amjad Ali	Kohat Forest Division against the vacant post of Deputy Ranger for one day actualization.
23.	Noor Ahmad	Kohat Forest Division against the vacant post of Deputy Ranger
24.	Mr. Niaz Muhammad	Forestry Planning & Monitoring Circle Peshawar against the vacant posts of Deputy Ranger
25.	Mr. Zulfiqar Khan	Forestry Planning & Monitoring Circle Peshawar against the vacant posts of Deputy Ranger

26.	Sultan Akbar	Demarcation Forest Division Peshawar against the vacant post of Deputy Ranger
27.	Mr. Qaisar Jehan	Mardan Forest Division against the vacant post of Deputy Ranger
28.	Mr. Rooh ul Amin	Mardan Forest Division against the vacant post of Deputy Ranger
29.	Mr. Waheed Jan	Peshawar Forest Division against the vacant post of Deputy Ranger
30.	Mr. Mukamil Jan	Peshawar Forest Division against the vacant post of Deputy Ranger
31.	Mr. Rasool Khan	Mardan Forest Division against the vacant post of Deputy Ranger
32.	Mr. Liaqat Ali -II	To actualize his appointment on the post of Deputy Ranger in Malakand Forest Division for one day and then to continue as Incharge Gagra Range of Buner Forest Division.
33.	Muhammad Imran	Lower Swat Forest Division against the post of Deputy Ranger
34.	Mian Karim Shah	Kalam Forest Division against the vacant post of Deputy Ranger
35.	Mr. Waqar Ahmad	To actualize his appointment on the post of Deputy Ranger in Patrol Squad Upper Hazara for one day and then to continue as Incharge Kandar Range of Torghar Forest Division.
36.	Diar Muhammad	Torghar Forest Division against the vacant post of Deputy Ranger
37.	Muhammad Khalid	Upper Kohistan Forest Division against the vacant post of Deputy Ranger
38.	Mr. Sajjad Hussain Shah	To actualize his appointment on the post of Deputy Ranger in Lower Kohistan Forest Division for one day and then to continue as Incharge Pattan Forest Sub Division of Lower Kohistan Forest Division.
39.	Mr. Tahir Ayub S/O Muhammad Ayub	Siran Forest Division against the vacant post of Deputy Ranger
40.	Muhammad Haroon	Demarcation Forest Division Mansehra against the vacant post of Deputy Ranger
41.	Mr. Jawad Ahmad Masroor	Patrol Squad Forest Division Lower Hazara against the vacant post of Deputy Ranger
42.	Syed Tauqeer Ahmad Shah	To actualize his appointment on the post of Deputy Ranger in Haripur Forest Division for one day and then to continue as Incharge Haripur Forest Sub Division.
43.	Mr. Bashir Ullah	To actualize his appointment on the post of Deputy Ranger in Chitral Forest Division for one day and then to continue as Incharge Sheringal Range of Dir Kohistan Forest Division.
44.	Mr. Sultan Haneef Shah	To actualize his appointment on the post of Deputy Ranger in Kohistan Watershed Division Besham for one day and then to continue as Incharge Kohistan Watershed Range of Kohistan Watershed Division Besham.
45.	Mr. Sadiq Amin	To actualize his appointment on the post of Deputy Ranger in Kunhar Watershed Division for one day and then to continue as Incharge Battagram Watershed Range of Unhar Watershed Division Mansehra.
46.	Syed Muhammad Dawood Shah	D.I.Khan Forest Division against the vacant post of Deputy Ranger
47.	Muhammad Ishaq Shah	South Waziristan Forest Division against the vacant post of Deputy Ranger
48.	Mr. Ihsan Ullah Dawar	To actualize his appointment on the post of Deputy Ranger in South Waziristan Forest Division (Lower) for one day and then to continue as Incharge Jamrud Range of Khyber Forest Division.

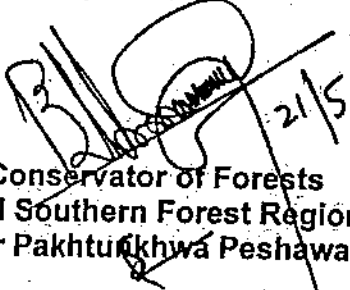
(1533)

Sd/-  
(Fazal Illahi)  
Chief Conservator of Forests  
Central Southern Forest Region-I

No. 6149-61 JE,

Copy forwarded for information and necessary action to the:-

1. Chief Conservator of Forests Northern Region-II, Abbottabad
2. Chief Conservator of Forests Malakand Forest Region-III, Saidu Sharif Swat
3. Conservator of Forests Forestry Planning & Monitoring Circle Peshawar
4. Conservator of Forests Central Forest Circle Peshawar
5. Conservator of Forests Range Management Circle Peshawar
6. Conservator of Forests Malakand East Forest Circle Saidu Sharif Swat
7. Conservator of Forests Upper Hazara Forest Circle Mansehra
8. Conservator of Forests Lower Hazara Forest Circle Abbottabad
9. Conservator of Forests Malakand West Forest Circle Timergara
10. Conservator of Forests Watershed Circle Abbottabad
11. Conservator of Forests Southern Forest Circle Bannu
12. Conservator of Forests Kohat Forest Circle at Peshawar
13. Section Officer (Establishment) Govt. of Khyber Pakhtunkhwa Climate Change, Forestry, Environment & Wildlife Department Peshawar

  
21/5

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

