

BEFORE THE KHYBER PAKHTUNKHWASERVICE TRIBUNAL, PESHAWAR

Appeal No.1803/2023

Asad Ullah s/o Sarfaraz Khan, Naib Qasid, Soil & Water Conservation Agriculture Department
Dir Upper.

Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Agriculture.
2. Director General Soil and Water conservation Khyber Pakhtunkhwa, Peshawar
3. Director Soil & Water Conservation, Dir Upper.
4. District Officer Soil and Water Conservation, Dir Upper.

RESPONDENTS

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Director General
Soil & Water Conservation
Khyber Pakhtunkhwa

07-11-24
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 1803/2023

Asad Ullah s/o Sarfaraz Khan, Naib Qasid, Soil & Water Conservation Agriculture Department
Dir Upper

.....Appellant

Versus

**Khyber Pakhtunkhwa
Service Tribunal**

1. Government of Khyber Pakhtunkhwa through Secretary Agriculture.
2. Director General Soil and Water conservation Khyber Pakhtunkhwa, Peshawar
3. Director Soil & Water Conservation, Dir Upper.
4. District Officer Soil and Water Conservation, Dir Upper.

Diary No. 16824
Dated 16-10-24

..... Respondents

REPLY ON BEHALF OF RESPONDENTS NO. 1,2,3&4

Respectfully Sheweth,

PRELIMINARY OBJECTIONS

1. That the appellant has no cause of action/ locus standi to file the instant appeal.
2. That the appellant has concealed the material facts from this Honorable Tribunal hence is liable to be dismissed.
3. That this Honorable Tribunal has no jurisdiction to entertain the instant appeal.
4. That the appellant wishes to waste the precious time of this Tribunal by filing the instant appeal.
5. That the appellant has not approached this Tribunal with clean hands.
6. That the appeal of the appellant is time barred.
7. That in the similar nature case this Hon'ble Tribunal passed the judgment dated 20.01.2023 in service appeal No. 534/2020, wherein operative part is "*It is as settle proposition that the government is entitle to make service rules in the interest of expediency of service and to remove anomaly in service rules, which in the absence of demonstrable malafide could not be assailed*" (Annex-I). Reliance is place on 2004 SCMR 1427 (Annex-II).

ON FACTS

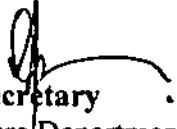
1. Correct to the extent that the appellant was appointed as Naib Qasid (BPS-01) on 16-02-2015 in Soil and Water Conservation Directorate of Agriculture Department.
2. The service rules for the promotion under 33% quota of Naib Qasid, Chowkidar and Sweeper to the post of Junior Clerk were framed on 18-04-2018 (Annex-III), which were further amended to include Field Watcher and Khalasi on 18-09-2019 for eligibility under the same quota (Annex-IV).
3. Incorrect. Muhammad Abbas and Hayat Khan were promoted in light of Honorable Tribunal Judgment dated 02.02.2022 (Annex-V) under the said quota, however the appellants were not promoted as they did not qualify as per notified seniority list, wherein the appellant is at serial No.40 (Annex-VI) and will be promoted on his own turn as per rules.

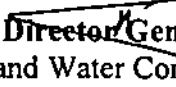
4. Incorrect. As explained in Para-3 above.
5. Incorrect. Amendment to the Service Rules was a policy matter and the government is empowered to amend the service rules as in similar nature case this Hon'ble Tribunal passed the judgment dated 20.01.2023 in service appeal No. 534/2020, wherein operative part is "*It is as settle proposition that the government is entitle to make service rules in the interest of expediency of service and to remove anomaly in service rules, which in the absence of demonstrable malafide could not be assailed*" (Annex-I). Reliance is place on 2004 SCMR 1427 (Annex-II).
6. Incorrect. No such appeal has been found on the record.
7. Needs no comments.


GROUND:

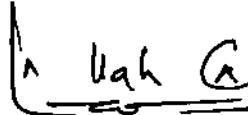
- A. Incorrect. Muhammad Abbas and Mr. Hayat Khan were promoted under the same quota in light of the judgement of this Honorable Tribunal. The appellant was not promoted as he did not qualify for promotion as per notified seniority list (Annex-IV).
- B. The Petitioner has been treated in accordance with Law and amendment to the Service Rules was a policy matter and the government is empowered to amend the service rules as in similar nature case this Hon'ble Tribunal passed the judgment dated 20.01.2023 in service appeal No. 534/2020, wherein operative is "*It is as settle proposition that the government is entitle to make service rules in the interest of expediency of service and to remove anomaly in service rules, which in the absence of demonstrable malafide could not be assailed*". Reliance is place on 2004 SCMR 1427.
- C. Incorrect. The Directorate General Soil and Water Conservation Khyber Pakhtunkhwa has always adopted the policy of promotion according to the notified service rules.
- D. Incorrect. The Directorate General Soil and Water Conservation Khyber Pakhtunkhwa has not violated any article of Islamic Republic of Pakistan 1973 and has treated all the persons in accordance with law.
- E. Incorrect. Amendment to the existing service rules is made for promotion purely as per the policy/rules of the Provincial Government.
- F. Incorrect. The appellant has not been discrimination against.
- G. That this Honorable Tribunal has no jurisdiction to entertain the instant appeal.
- H. That additional ground will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is therefore humbly prayed that the instant appeal having no lawful grounds may graciously be dismissed with cost along with directions to the appellant to wait for their turn for promotion on the basis of seniority cum-fitness as per rules.


Secretary
 Agriculture Department
 Government of Khyber Pakhtunkhwa.
 (Respondent No.1)
 ATTA-UR-REHMAN


Director General
 Soil and Water Conservation
 Khyber Pakhtunkhwa Peshawar
 (Respondent No2)
 MUHAMMAD YASEEN


Director
 Soil & Water Conservation
 Dir Upper
 (Respondent No.3)
 ABDULLAH KHAN

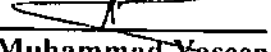

District Officer
 Soil & Water Conservation
 Dir Upper
 (Respondent No.4)
 ABDULLAH KHAN



AUTHORITY LETTER

Mr. Ali Muhammad, Superintendent (BS-17) office of the Director Soil & Water Conservation, Swat is hereby authorized to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Swat Camp on 07-11-2024 at 09:00 am on behalf of respondents in Service Appeal No. 1802/ 2023 Fazal Muhammad and appeal No. 1803/ 2023 Asad Ullah v/s Government of Khyber Pakhtunkhwa through Secretary Agriculture and others. He is further directed to pursue the case in the Honorable Khyber Pakhtunkhwa Service Tribunal Swat Camp till decision of the case.

attested
Deputy Director
Soil Conservation
Khyber Pakhtunkhwa Peshawar.


Muhammad Yaseen
Director General
Soil & Water Conservation
Khyber Pakhtunkhwa
Peshawar

BEFORE THE KHYBER PAKHTUNKHWASERVICE TRIBUNAL, PESHAWAR

Appeal No. 1803/2023

Asad Ullah s/o Sarfaraz Khan, Naib Qasid, Soil & Water Conservation Agriculture Department
Dir Upper.

Appellant

Versus

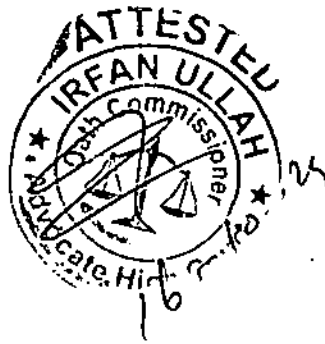
1. Government of Khyber Pakhtunkhwa through Secretary Agriculture.
2. Director General Soil and Water conservation Khyber Pakhtunkhwa, Peshawar
3. Director Soil & Water Conservation, Dir Upper.
4. District Officer Soil and Water Conservation, Dir Upper.

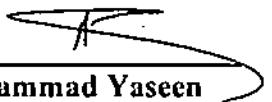
RESPONDENTS

Affidavit

I, Muhammad Yaseen, Director General Soil and Water Conservation Khyber Pakhtunkhwa, Peshawar do hereby solemnly affirm on oath that the contents of accompanying comments on behalf of respondent No. 1 to 4 are correct to the best of my knowledge and behalf. Nothing has been concealed from this Honorable Tribunal.

Respondents through




 Muhammad Yaseen
 CNIC: 11101-8977676-3
 Cell No. 0335-9524262
 Respondent No. 02



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No.534/2020

Date of Institution

22.01.2020

Date of Decision

20.01.2023

RECORDED
AT
Peshawar

Mr. Naseem Khan, Soil Conservation Assistant (BPS-17), O/O the
Director General Soil & Water Conservation, Khyber Pakhtunkhwa,
Peshawar.

(Appellant)

VERSUS

The Government of Khyber Pakhtunkhwa through Chief Secretary
Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and five others.

(Respondents)

Noor Muhammad Khattak
Advocate

For Appellant

Muhammad Adeel Butt
Additional Advocate General

For Respondents

Muhammad Asif Yousafzai
Advocate

For Private Respondent

Mrs. Rozina Rehman
Miss Farzha-Paúl


Member (J)

Member (E)

JUDGMENT

Rozina Rehman, Member (J): Through this single judgment, we intend to
dispose of instant service appeal as well as connected Service Appeals
which are mentioned as below:

1. Service Appeal No.535/2020 titled "Noor Muhammad Vs.
Government of Khyber Pakhtunkhwa & others"


Deputy Director
Soil Conservation

Khyber Pakhtunkhwa Peshawar

ATTESTED


SUGGESTIONER

2. Service Appeal No:536/2020 titled "Asad Ullah Vs. Government of Khyber Pakhtunkhwa & others"
3. Service Appeal No:537/2020 titled "Sami Ullah Vs. Government of Khyber Pakhtunkhwa & others"
4. Service Appeal No:538/2020 titled "Sajjad Hussain Vs. Government of Khyber Pakhtunkhwa & others"
5. Service Appeal No:539/2020 titled "Umer Rehman Vs. Government of Khyber Pakhtunkhwa & others"
6. Service Appeal No:540/2020 titled "Bilal Ahmad Vs. Government of Khyber Pakhtunkhwa & others"
7. Service Appeal No:541/2020 titled "Aqib Nouman Vs. Government of Khyber Pakhtunkhwa & others & others"
8. Service Appeal No:542/2020 titled "Navced Hashim Vs. Government of Khyber Pakhtunkhwa & others"
9. Service Appeal No:543/2020 titled "Ayesha Riaz Vs. Government of Khyber Pakhtunkhwa & others"
10. Service Appeal No:544/2020 titled "Muhammad Amir Vs. Government of Khyber Pakhtunkhwa & others"

as common questions of law and facts are involved in all the appeals. The prayer sought by the appellants is copied as below:

"That on acceptance of this appeal the impugned notification dated 18.09.2019 may kindly be declared as Ultra Vires, illegal, unconstitutional and ineffective upon the rights of the appellant. That the respondents may kindly be directed to restore the 100% promotion quota of the appellant to the posts of

Abdul
 Deputy Director
 Soil Conservation
 Khyber Pakhtunkhwa Peshawar

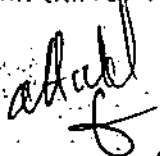
ATTESTED

B

Deputy Director Soil Conservation, Deputy Director Planning, Deputy Director Soil Survey and District Officer Soil Conservation (BPS-18) and as such the appellant may kindly be considered for promotion to the higher scale of (BPS-18). Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellant".

2. Brief facts of the case are that the appellant was appointed through Khyber Pakhtunkhwa Public Service Commission as Soil Conservation Assistant (BPS-17) vide notification dated 07.09.2018. The appellant served the respondent department quite efficiently, whole heartedly and up to the entire satisfaction of his superiors. The respondent department issued notification dated 18.04.2018 whereby proper service structure for the employees of the respondent department has been approved/notified and according to the said service structure the employees of respondents department have categorized in twenty five different cadres for the purpose of seniority and their prospects of promotions. In the notified service rules/structure the post of Deputy Director Soil Conservation, Deputy Director Planning, Deputy Director Soil Survey and District Officers Soil Conservation shown at serial No. 3 of the appendix were given the method of recruitment by promotion on the basis of seniority-cum-fitness from amongst the Assistant Director (Planning Supervisory), Soil Conservation Assistants (Technical), Soil survey Research Officer and Assistant Soil Survey Research Officer and Assistant Soil

8-7


Deputy Director
Soil Conservation
Khyber Pakhtunkhwa Peshawar


ATTESTED

Survey Research Officer having qualification as prescribed in column No. 2 against serial No. 4 of the said Notification through joint seniority list. According to those service rules employees belonging to said cadres were promoted from time to time on the basis of joint seniority lists. This is the impugned notification dated 18.09.2019 the 100% promotion quota reserved for the appellant was reduced to 75% and as such rest of the 25% were allocated to the cadre of Field Assistant which would certainly affect the seniority and promotion of the appellant and the other cadres to the BPS-18 because according to the mentioned rules a Field Assistant (BPS-9) with a diploma course of three years after matric without a specialized degree will not validate the running of post of purely technical in nature and supervising over post graduates and Ph.D degree holders. Feeling aggrieved from the terms of impugned notification dated 18.09.2019, the appellant filed departmental appeal before competent authority (respondent No.1) which was not responded to, hence the present service appeal.

3. We have heard Nour Muhammad Khattak Advocate learned counsel for appellant and Muhammad Adeel Butt learned Additional Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

4. Learned counsel for the appellant submitted that the impugned notification is ultra vires, against facts, law, norms of natural justice and material on the record hence not tenable and liable to be modified.

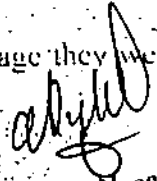
adil
Deputy Director
 Soil Conservation
 Muzher Pakhtunkhwa Peshawar

TESTED

 Deputy Director
 Soil Conservation
 Muzher Pakhtunkhwa Peshawar

He contended that appellant was not treated by the respondent department in accordance with law and rules on the subject and the respondents violated Article 4 & 25 of the Constitution of Islamic Republic of Pakistan, 1973. He further contended that treatment meted out to the appellant is a clear violation of the fundamental Rights of the appellant as enshrined in the Constitution of Pakistan 1973. It was submitted that appellant has been discriminated by the respondents on the subject and they violated the principles of natural justice. Lastly, he submitted that the amendment in the service rules will also pave way for awarding charge of the DDO post to incapable Field Assistant in own pay and scale and that simple degree holder will not hold the post of Director/District Officer Soil & Water Conservation (BPS-18) without any relevant field/professional degree; he, therefore, requested for acceptance of the instant service appeal.

5. Conversely, learned counsel for private respondent No. 6 assisted by learned Additional Advocate General submitted that amendments in the service rules are made by the Government. As the said notification dated 18.09.2019 regarding revised service rules has been based by the government in consultation with Establishment, Law and Finance Department in the best interest of public service and for better opportunities to the employees. He contended that from the notification dated 18.09.2019, no one has been effected from their promotion. He argued that appellants were having less than two years of service, as per seniority list, at this stage they were not entitled for promotion to


Deputy Director
Soil Conservation
Khyber Pakhtunkhwa Peshawar

ATTESTED



6.

the post of Deputy Director, Soil Conservation, Deputy Director (Monitoring), Deputy Director Soil Survey and District Officers Soil Conservation and that in the said notification 75% quota had been reserved for the cadre of appellant and they will avail benefit of promotion according to seniority-cum-fitness, having at least Second Class Master's Degree in Agriculture or at least Second Class Bachelor's Degree in Agriculture. He, therefore, requested for dismissal of instant service appeal.

6. We have heard learned counsel for the parties and perused the record. From the record it is evident that the appellant has made impugned the notification dated 18.09.2019, whereby the 100% promotion quota reserved for the cadre of the appellant was reduced to 75% and as such the rest of 25% was allocated to the cadre of Field Assistant. Perusal of record would reveal that the respondent department had issued notification dated 18.04.2018 whereby proper service structure for the employees of respondent department had been notified/approved and according to the said service structure the employees were categorized in 25 different cadres for the purpose of seniority and their prospect for promotion. In the above mentioned notified service rules/structure, the post of Deputy Director Soil Conservation, Deputy Director Planning, Deputy Director Soil Survey and District Officer Soil Conservation shown at Serial No. 3 of the appendix were given the method of recruitment under column 5 which is hereby reproduced for ready reference:

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Deputy Director
Soil Conservation
Mhyber Pakhtunkhwa Peshawar

APPEALED
[Signature]
EXAMINED
18/09/2019

"By promotion on the basis of seniority-cum-fitness from amongst Assistant Directors, (Planning Supervisory), Soil Conservation Assistants, Soil Conservation Assistants (Technical), Soil Survey Research Officer and Assistant Soil Survey Research officer having 5 years as such with minimum qualification as prescribed in column No. 2 against Serial No. 4 of the said notification"

According to the above mentioned service rules employees belonging to the above mentioned cadres were promoted from time to time on the basis of joint seniority list. The impugned notification dated 18.09.2019 reveals that 100% promotion quota reserved for the appellant was reduced to 75% and as such the rest of 25% was allocated to the cadre of field Assistant. The above mentioned 25% quota was impugned before this bench by submitting that the amendment in service rule will pave way for awarding charge of the DDO post to incapable field Assistant and that a simple degree holder will hold the post of Director. The appellant was appointed on the recommendation of Khyber Pakhtunkhwa Public Service Commission as Soil Conservation Assistant in BS-17 vide notification dated 07.09.2018. One Mr. Jaffar Shah, respondent No.6 was promoted in view of 25% quota as the appellant had not completed the prescribed length of service required for promotion. The appellant was neither superseded nor deferred as the same is evident from the date of his appointment. The Department has not refused promotion to the appellant and they would be promoted when become eligible for promotion. Their promotion was not delayed by the respondent No. 6

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ahmad
 Deputy Director
 Soil Conservation
 Khyber Pakhtunkhwa Peshawar

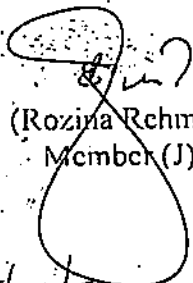
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[Signature]
 Secretary
 Soil Conservation

and they would be promoted according to law subject to availability of post and the prescribed length of service required for promotion. Amendment made to the service rules in question was a policy matter and the government was empowered to reduce the promotion quota of Deputy Directors Soil Conservation etc. and to allocate 25% of quota to the Field Assistant. We have observed that no allegation of any malafide was raised by the appellant. It is a settled proposition that government is entitled to make service rules in the interest of expediency of service and to remove anomaly in service rules, which in the absence of demonstrable malafide could not be assailed. Reliance is placed on 2004 SCMR 1427.

7. In view of the above discussion, the appeal in hand as well as connected Service Appeals No. 535/2020, 536/2020, 537/2020, 538/2020, 539/2020, 540/2020, 541/2020, 542/2020, 543/2020, 544/2020, being devoid of merit stands dismissed. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
20.01.2023



(Narecha Paul)
Member (I)


(Rozina Rehman)
Member (J)

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 25/01/23
 Number of Page 8
 Copying Fee 40/-
 Urgent 40/-
 Total 40/-
 Name of 14/3/23
 Date of Completion of 14/3/23
 Date of Delivery of Copy 14/3/23


Deputy Director
Soil Conservation
Khyber Pakhtunkhwa Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

Service Appeal No. 6338/2020

Date of Institution ... 30.06.2020

Date of Decision ... 02.02.2022



Muhammad Abbas, Naib Qasid (BPS-03), Soil & Water Conservation, Agriculture Department, Haripur.

...(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Agriculture, Civil Secretariat, Peshawar and two others.

...(Respondents)

MR. SHAH FAISAL ILYAS,
Advocate

For appellant.

MR. NOOR ZAMAN KHATTAK,
District Attorney

For respondents.

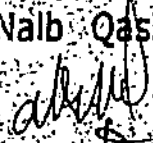
MR. SALAH-UD-DIN
MS. ROZINA REHMAN

MEMBER (JUDICIAL)
MEMBER (JUDICIAL)

JUDGMENT:

SALAH-UD-DIN, MEMBER:- Through this single judgment we intend to dispose of instant service appeal as well as connected Service Appeal bearing No. 6339/2020 titled "Hayat Khan Versus Government of Khyber Pakhtunkhwa through Secretary Agriculture, Civil Secretariat, Peshawar and two others" as common questions of law and facts are involved in both the appeal.

2. Brief facts forming the background of the instant service appeal as well as connected service appeal mentioned above are that the appellants Muhammad Abbas as well as Hayat Khan were appointed as Naib Qasids in Soil and Water


Deputy Director
Soil Conservation
Khyber Pakhtunkhwa Peshawar

RECEIVED

MEMBER (JUDICIAL)
Khyber Pakhtunkhwa
Services Tribunal

Conservation Wing (Agriculture Department) In the year 1993 and 2009 respectively. No Rules were formulated for promotion of employees in Soil and Water Conservation Wing, however so many employees working in Extension as well as Engineering Wings of the same Department were promoted on the basis of rules notified on 21 November 1983, in pursuance of Rule-3(2) of APT Rules, 1989. The appellants were eligible for promotion to the post of Junior Clerks but they were not promoted, therefore, they filed separate Writ Petitions seeking their promotion to the post of Junior Clerks. In the meanwhile, rules were notified for the posts in Directorate of Soil Conservation, whereby 33% quota for promotion to the post of Junior Clerk was reserved for Naib Qasids, Chowkidars and Sweepers on the basis of seniority-cum-fitness. Upon commitment of learned AAG that the aforementioned quota will be fully observed in future, the Writ Petition No. 946-A/2017 filed by the appellant Muhammad Abbas was disposed of with the directions that the respondents shall fully observe and implement the 33% quota in letter and spirit. Similarly, Writ Petition No. 96-P/2018 filed by the appellant Hayat Khan, was disposed of with the observations that learned AAG had stated at the bar that rules were though framed, however seniority list was not prepared and that the appellant would be considered for promotion to the post of Junior Clerk, subject to availability of post. The appellants being senior most Naib Qasids were required to have been promoted to the post of Junior Clerks under the rules notified vide Notification dated 18.04.2018, however they were ignored, therefore, they filed COC in the august Peshawar High Court, Peshawar. On 20.11.2019, learned AAG stated before the worthy High Court that the appellants alongwith other candidates would be considered for promotion against the posts of Junior Clerks within a period of 04 months, therefore, COC Petition was disposed of with the directions to the respondents to live up to their commitment so made before the court and consider the appellants alongwith others for desired promotion within a period of 04 months. The order of

Abdul
Deputy Director

Soil Conservation

Ministry Pakhtunshwa Peshawar

ATTENDED

[Signature]
Deputy Director
Soil Conservation
Ministry Pakhtunshwa Peshawar

worthy Peshawar High Court was, however flouted by the respondents and posts of Junior Clerks were advertised despite the fact that no promotion to the post of Junior Clerk was made by the department since its establishment. The appellants filed another Writ Petition No. 3271-P/2019, which was disposed of on 19.08.2019 with the directions to the respondents to fully observe and implement the promotion policy of 33% quota reserved for Class-IV employees, in letter and spirit. The grievance of the appellants was still not redressed by the respondents rather they introduced amendments in the rules and categories of Field Watchers and Khalasis were also included in the categories of employees eligible for promotion to the post of Junior Clerks. The appellants thus filed COC Petition in the august Peshawar High Court, Peshawar, which was disposed of vide order dated 18.03.2020 with the observations that the appellants were civil servants and the controversy agitated in the Writ Petition pertained to promotion, therefore, the High Court was having no jurisdiction in the matter. It was further held that the appellants would, however be at liberty to approach the proper forum, against any action of respondents, detrimental to their rights. The appellants then filed separate departmental appeals, which were not responded within the statutory period of 90 days, therefore, the appellants preferred instant as well as connected service appeal for redressal of their grievance.

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3. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions made by the appellants in their appeals.

4. Learned counsel for the appellants has contended that the appellants being senior most Naib Qasids were having prescribed educational qualification and were eligible for promotion to the posts of Junior Clerks but their promotions were not made despite availability of seats; that the appellants filed various Writ Petitions and after adopting of rules notified vide Notification dated 18.04.2018, it was committed by the respondents before the august Peshawar High Court that the

Abdul
Deputy Director
Soil Conservation
Mhyber Pakhtunkhwa Peshawar

ATTESTED
[Signature]
Mhyber Pakhtunkhwa
Muzir, Peshawar

promotions to the post of Junior Clerk shall be made in compliance of the said rules but later on the respondents introduced amendments in the rules by inclusion of Field Watchers and Khalasis in the category of Class-IV for promotion to the post of Junior Clerk, thereby depriving the appellants of their due rights of promotion; that the Impugned amendments in the rules have been made with mala-fide intention for the purpose of defeating the order dated 08.11.2018 passed by august Peshawar High Court, Abbottabad Bench in Writ Petition No. 946-A/2017 filed by the appellant Muhammad Abbas; that the respondents were required to have circulated the Impugned amendments before notifying us, however the same were kept secret with mala-fide intention; that each cadre post has its own seniority and promotion quota, therefore, including of Field staff with office cadres is ultra vires of service law/rules; that the right of the appellants for their promotion to the post of Junior Clerk had already matured prior to the Impugned amendments in the concerned rules, therefore, the same are ineffective upon the rights of the appellant and are liable to be struck down.

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5. On the other hand, learned District Attorney for the respondents has contended that according to newly framed Service Rules of Directorate of Soil and Water Conservation, 33% quota for promotion of Class-IV employees to the post of Junior Clerk is observed strictly and three Class-IV employees have already been promoted vide order dated 21.10.2020; that the appellants as per their seniority position in the seniority list of Class-IV employees shall be considered for promotion on their turn; that the impugned amendments in the Service Rules were made as per policy/rules of the Provincial Government, therefore, the appellants are having no *locus standi* to challenge the same.

6. Arguments heard and record perused.

7. The appellants are serving on the posts of Naib Qasid in Soil and Water Conservation Department. The appellant Muhammad Abbas filed Writ Petition No. 946-A/2017, seeking

[Handwritten signature]
 Deputy Director
 Soil Conservation
 Mhyber Pakhtunkhwa Peshawa.

ATTESTED
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 JAMNAR
 Khyber Pakhtunkhwa
 Service Tribunal

promotion to the post of Junior Clerk. The aforementioned writ petition was disposed of by august Peshawar High Court, Abbottabad Bench vide order dated 08.11.2018, which is reproduced as below:-

"Through this petition, petitioner seeks his promotion as Junior Clerk against 33% quota reserved for Class-IV employees.

2. Perusal of the record would reveal that vide Notification dated 18.04.2018, 33% quota for promotion to the posts of Junior Clerks has been reserved for the Naib Qasids, Chowkidars and Sweepers on the basis of seniority-cum-fitness. Learned AAG submitted at the bar that the prescribed quota will be observed in future on which learned counsel for the petitioner did not press this petition anymore.

3. In view of the above, this petition stands disposed of with directions to the respondents to fully observe and implement the 33% quota in letter and spirit."

8. Similarly, Writ Petition No. 96-P/2018, filed by the appellant Hayat Khan for his promotion to the post of Junior Clerk was disposed of by august Peshawar High Court, Peshawar vide order dated 18.12.2018, the relevant portion of which is reproduced as below:-

"When the case was taken up for hearing, learned AAG stated at the bar that rules in this regard has been framed but at the moment seniority list has not been prepared for the purpose. Further deposed that matter is in pipeline, though as and when completed petitioner will be considered for promotion to the post of Junior Clerk, subject to availability of post. Learned counsel for the petitioner when confronted with the situation, he also solicited the same.

3. With these observations, the petition in hand is disposed of."

9. While going through the orders so passed by august Peshawar High Court in the Writ Petitions filed by the appellants, it is crystal clear that the rules notified vide Notification dated 18th April 2018 were made applicable for

Attested
Deputy Director

Soil Conservation,
District Paktunkhwa Peshawar

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Khyber Pakhtunkhwa
Service Tribunal

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Initial recruitment/promotion to various posts in the Directorate of Soil and Conservation Department. According to serial No. 18 column No. 05 of the said rules, 33% posts of Junior Clerk were to be filled on basis of seniority-cum-fitness from amongst the Naib Qasids, Chowkidars and Sweepers with two years service as such, who have passed Secondary School Certificate from recognized Board. Admittedly, not a single post of Junior Clerk was filled through promotion till the rules notified vide Notification dated 18.04.2018. The appellants were serving as Naib Qasids and were having the prescribed educational qualification, therefore, respondents were required to have considered them for promotion on the basis of the rules notified vide Notification dated 18th April 2018 but promotions to the posts of Junior Clerks were delayed and in the meanwhile, vide Notification dated 18.09.2019, column No. 05 of serial No. 18 of the rules notified vide Notification dated 18.04.2018 was amended and categories of Field Watchers and Khalasis were also included in the category of employees for 33% quota of promotion to the post of Junior Clerk. The amendment so introduced vide impugned Notification dated 18.09.2019 affected seniority of the appellants adversely and their prospects for promotions were also affected adversely for the reason that Field Watchers and Khalasis were also included in the category of employees to be considered for promotion to the post of Junior Clerk. It is well settled that any amendment which deprives a person of his right has to be construed prospectively. August Supreme Court of Pakistan in its judgment reported as 2012 SCMR 965 has observed as below:-

"8. The argument of the learned counsel for the appellant that such an approach of the Tribunal was against the spirit of the amended rule, is misconceived. The rule does not permit the department to overlook the rights of the employees created under the law by applying the amended rule to extend benefits to those who were not in run at the time when the right of the respondents for promotion was matured, but on account of unexplained reasons they were not

attest
Deputy Director
Soil Conservation
Chamber Pakhtunkhwa Peshawar

ATTESTED

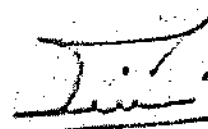
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Secretary
Service Tribunal

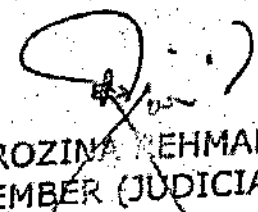
considered for promotion inspite of the fact that their names were mentioned in the seniority list besides the availability of the vacancies".

While seeking wisdom from the judgment of august Supreme Court of Pakistan reported as 2012 SCMR 965, we are of the view that the amendments introduced vide Notification dated 18.09.2019 could not be made applicable to the appellants, as they were entitled to be dealt with for their promotion to the posts of Junior Clerk under the rules notified vide notification dated 18.04.2018.


10. In light of the above discussion, respondents are directed to consider the appellants for their promotion to the posts of Junior Clerk on the basis of rules notified vide Notification dated 18.04.2018 as existed prior to amendments made vide Notification dated 18.09.2019. The appeal in hand as well as connected Service Appeal bearing No. 6339/2020 titled "Hayat Khan Versus Government of Khyber Pakhtunkhwa through Secretary Agriculture, Civil Secretariat, Peshawar and two others", are disposed of accordingly. Parties are left to bear their own costs. File be consigned to the record room.

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02.02.2022

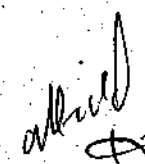

(SALAH-UD-DIN)
MEMBER (JUDICIAL)


(ROZINA REHMAN)
MEMBER (JUDICIAL)

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Peshawar

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Soil Conservation
Khyber Pakhtunkhwa Peshawar

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. PIII

GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 19TH SEPTEMBER, 2019.

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK AND COOPERATION DEPARTMENT.

NOTIFICATION

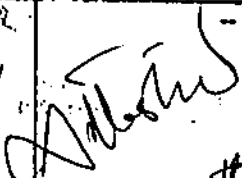
Peshawar, dated the 18/04/2018

No. SOE(AD)II(2)429/2015-16/SC: ... In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment Promotion and Transfer) Rules, 1989 and in supersession of all previous Notifications issued in this behalf, the Agriculture, Livestock and Co-operation Department, in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment qualification and other conditions specified in column No.3 to 5 of the Appendix appended to this Notification, which shall be applicable to the posts mentioned in column No.2 of the said Appendix in the Directorate of Soil Conservation.

APPENDIX

PART-I

PROFESSIONAL STAFF.

S/No	Nomenclature of the post.	Minimum qualification for appointment by Initial recruitment.	Age Limit.	Method of Recruitment.
1	1. Director General.			
				By promotion, on the basis of seniority-cum-fitness, from amongst the Directors Soil Conservation and Directors Soil Survey with at least five years' service as such in BPS-19 or seventeen years' service in BPS-17 and above, having undergone Senior Management Course. Note: A joined seniority list of Director Soil Conservation and Director Soil Survey shall be maintained for the purpose of promotion.
2.	Director Soil Conservation/ Director Soil Survey.	 Superintendent To Director General Soil & Water Conservation KPK Peshawar.		By promotion, on the basis of seniority-cum-fitness, from amongst the Deputy Directors Soil Conservation, Deputy Directors (Planning), Deputy Directors Soil Survey and District Officers Soil Conservation, having seven years' service in BPS-18 or twelve years' service in BPS-17 and above. Note: A joined seniority list of Deputy Directors Soil Conservation, Deputy Directors (Planning), Deputy Directors Soil Survey and District Officers Soil Conservation, shall be maintained for the purpose of promotion.

18.	Junior Clerk.	(i) At least Second Division Secondary School Certificate or equivalent qualification from a recognized Board; and (ii) A speed of thirty words per minute in typing.	18 to 30 years.	(a) Thirty three percent by promotion, on basis of seniority-cum-fitness from amongst the Naib Qasid, Chowkidar and Sweeper with two year service as such, who have passed Secondary School Certificate from recognized Board; and (b) sixty-seven percent by initial recruitment. Note: For the purpose of promotion, there shall be maintained a joined seniority list of the officials i.e Naib Qasid, Chowkidar and Sweeper with reference to the dates of their acquiring the Secondary School Certificate. Provided that:- (a) If two or more officials having acquired the Secondary School Certificate in the same session, the inter-se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post; and (b) where a senior official does not possess the requisite qualification at the time of filling of the vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.
19.	Driver.	Literate having valid LTV driving license. Preference shall be given to those who have sufficient experience in driving, repairing, and maintenance of vehicles.	18 to 32 years.	By initial recruitment.
20.	Tracer.	At least Second Class Secondary School Certificate with (Science) from a recognized Board.	18 to 32 years.	By initial recruitment.
21.	Khansi.	Literate.	18 to 40 years.	By initial recruitment.
22.	Field Watcher.	Literate.	18 to 40 years.	By initial recruitment.
23.	Naib Qasid.	Literate.	18 to 40 years.	By initial recruitment.
24.	Chowkidar.	Literate having sound physique.	18 to 40 years.	By initial recruitment.
25.	Sweeper.	Literate.	18 to 40 years.	By initial recruitment.

Sd/xxx
SECRETARY AGRICULTURE

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

Attested
[Signature]
Superintendent
To Director General
Soil & Water Conservation
KPK Peshawar

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. P.III

GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 24TH SEPTEMBER, 2019.

GOVERNMENT OF THE KHYBER PAKHTUNKHWA AGRICULTURE LIVESTOCK AND COOPERATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the 18 / 09 / 2019

No.SOE(AD)II(2)429/2019/SC.- In pursuance of the provisions contained in sub-rules(2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Agriculture, Livestock & Cooperation Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. SOE(AD)II(2)429/2015-16/SC, Dated: 18th April, 2018, the following amendments shall be made, namely:

AMENDMENTS

In the Appendix,

(a) in PART-I. under the heading PROFESSIONAL STAFF, -

(i) for the existing entries, against Serial No. 03, the following shall be substituted in the respective columns, namely:

1	2	3	4	5
3.	"Deputy Directors Soil Conservation, Deputy Directors (Planning), Deputy Director (Monitoring), Deputy Directors Soil Survey, District Officers Soil Conservation.			(a) Seventy-five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Soil Conservation Assistants, Soil Conservation Assistants (Technical), Soil Conservation Officers, Soil Survey Research Officers and Assistant Soil Survey Research Officers having at least Second Class Master's Degree in Agriculture (Soil Sciences); or at least Second Class Bachelor's Degree (Hons) in Agriculture with (Soil Sciences) from a recognized University with five years service as such; and (b) twenty-five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Soil Conservation Assistants, having at least Second Class Bachelor's Degree from a recognized University with twenty-five years total service as Field Assistant and above. Note: For the purpose of promotion, a joint seniority list of the Soil Conservation Assistants, Soil Conservation Assistants (Technical), Soil Conservation Officers, Soil Survey Research Officers and Assistant Soil Survey Research Officers, shall be maintained."; and

[Signature]
[Signature]
Superintendent
To Director General
Soil & Water Conservation
APK Peshawar

(ii) against Serial No. 4, in Column No. 2, for the words "Assistant Director (Planning Supervisory)", the words "Soil Conservation Officer" shall be substituted; and

(b) in PART-II, under the heading MINISTERIAL STAFF, -

(i) against Serial No. 12, in Column No. 5, for the existing entries, the following shall be substituted, namely:

5
By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants and Senior Scale Stenographer with at least five years service as such or twelve years total service as Junior Clerk, Senior Clerk and Assistant.
Note: For the purpose of promotion, a joint seniority list of the Assistants and Senior Scale Stenographers to the post of Superintendent shall be maintained.
Provided that if the date of continuous officiating of an Assistant and Senior Scale Stenographer is the same, the Assistant shall rank senior to the Senior Scale Stenographer. and

(ii) against Serial No. 18, in Column No. 5, for the existing entries, the following shall be substituted, namely:

5
(a) Thirty-three percent by promotion, on the basis of seniority-cum-fitness, from amongst the Naib Qasids, Chowkidars, Field Watchers, Khalasis and Sweepers having Secondary School Certificate from a recognized Board with two years service as such; and
(b) sixty seven percent by initial recruitment.

Sd/-

SECRETARY TO
GOVERNMENT OF THE KHYBER PAKHTUNKHWA
AGRICULTURE, LIVESTOCK AND
COOPERATION DEPARTMENT.

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

Attested
HC
Superintendent
To Director General
Soil & Water Conservation
KPK, Peshawar

VI

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NOTIFICATION

IN PURSUANCE OF SECTION-8 (1) OF KHYBER PAKHTUNKHWA CIVIL SERVANT ACT, 1973 READ WITH RULES 17 OF KHYBER PAKHTUNKHWA CIVIL SERVANT (APPOINTMENT PROMOTION AND TRANSFER) RULES 1989 FINAL SENIORITY LIST OF CLASS-IV (NAIB QASID, CHOWKIDAR, FIELD WATCHER, KHALASI AND SWEEPER) BS-03 OF SOIL AND WATER CONSERVATION DEPARTMENT AS IT STOOD ON 01-01-2024 NOTIFIED/CIRCULATED AS UNDER.

S.No	Name	Designation	Qualification	CNIC No	Date of Birth	Home District.	Date of 1 st appointment	Date of present position
1.	Anayatullah shah	Field Watcher	Matric	13301-1338460-5	14-02-1965	Haripur	24-10-1992	24-10-1992
2.	Atta Ullah Jan	Field Watcher	Matric	13301-0601500-1	30-10-1968	Haripur	24-10-1992	24-10-1992
3.	Asmat Nawaz	Field Watcher	F. A	13301-1320470-5	01-01-1971	Haripur	01-08-1993	01-06-1995
4.	Fayaz Ahmad	Field Watcher	FA	15602-0955359-7	01-01-1975	Swat	15-09-1993	15-09-1993
5.	Rashid Ali	Field Watcher	Metric	13101-5131746-1	01-06-1973	Abbottabad	26-12-1994	01-08-1995
6.	Naik Nawaz	Field Watcher	Metric	11101-1442083-5	01-01-1975	Bannu	17-08-1995	07-01-2007
7.	M. Aziz	Chowkidar	Matric	12101-7490702-7	25-01-1976	D.I. Khan	16-10-1995	16-10-1995
8.	Muhammad Javed	Field Watcher	Metric	13101-0899755-9	01-01-1973	Abbottabad	10-09-1996	10-09-1996
9.	Dilawar Khan	Field Watcher	Matric		29-04-1967	Lakki Marwat	03-02-1999	03-02-1999
10.	Mehtab Alam	Field Watcher	Metric		14-05-1983	Kohat	01-07-2004	01-07-2004
11.	Mukhtiar Ahmad	Chowkidar	F. A	16202-0898252-9	20-07-1979	Swabi	06-12-2004	06-12-2004
12.	Amjad Ali	Field Watcher	F. A	15402-7826612-3	11-02-1987	Malakand	09-03-2005	05-11-2013
13.	Shabab Hussain	Field Watcher	B. A		18-03-1986	Hangu	01-07-2006	01-07-2006
14.	Habib ur Rehman	Field Watcher	M.A	12201-1485172-9	08-09-1988	Tank	27-10-2008	01-11-2008
15.	Mushiaq Ahmed	Field Watcher	F. A	12201-1867995-3	08-08-1988	Tank	27-10-2008	01-11-2008
16.	Noor Aslam	Field Watcher	F.A	12201-8025725-1	01-03-1989	Tank	27-10-2008	01-11-2008
17.	Azeem Khan	Field Watcher	B. A	15402-5816668-7	16-06-1972	Malakand	04-11-2008	04-11-2008
18.	Jamshad Iqbal	Field Watcher	Matric		02-03-1979	Lakki Marwat	27-02-2009	27-02-2009
19.	Taj Ali	Field Watcher	F. A	17201-2298356-5	11-04-1977	Nowshera	15-04-2009	15-04-2009
20.	M.Kamran	F/Watcher	F. A	12101-0375691-9	10-05-1986	D.I. Khan	01-07-2009	08-01-2015
21.	Sabir Hussain	Field Watcher	S.S.C	14202-1318670-3	16-02-1981	Karak	16-10-2009	16-10-2009
22.	Fahim Khan	F/W	F. A	17301-0670024-9	30-04-1985	Peshawar	07-12-2009	01-03-2012
23.	Abdul Malik	Chowkidar	BBA (hons)	13504-3404360-3	05-02-1991	Mansehra	14-01-2010	14-01-2010
24.	Ajmal Hussain	Field Watcher	F. A	15302-0845902-1	07-03-1989	Dir Lower	01-02-2010	
25.	Muhammad Naeem	Field Watcher	Matric	16202-9086671-1	10-04-1977	Swabi	23-09-2010	23-09-2010
26.	Abdul Waheed Khan.	F/W	D.Com	17301-3417825-9	25-10-1984	Peshawar	20-09-2011	23-10-2018
27.	Ismail Babo	Chowkidar	Matric	17201-3971147-1	08-03-1983	Nowshera	20-03-2012	01-10-2013
28.	Faiz Muhammad	F/W	Matric	17301-8176950-3	16-01-1979	Peshawar	31-05-2012	17-02-2015
29.	Muhammad Idrees	Chowkidar	Matric	15602-0483035-1	03-04-1980	Swat	29-06-2012	29-06-2012

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Superintendent
To Director General
Soil & Water Conservation
KPK Peshawar

30.	Muhammad Raees	Chowkidar	Matric	13503-0621453-9	05-02-1982	Mansehra	22-10-2013	22-10-2013
31.	Sohail Anjum	Naib Qasid	F. A.	13503-8172420-5	11-04-1983	Mansehra	23-10-2013	23-10-2013
32.	Bilal	Chowkidar	Matric	16201-5044305-7	01-01-1994	Swabi	06-01-2014	06-01-2014
33.	Fazal Mohammad	Chowkidar	F. A	14301-1979753-3	13-06-1978	Malakand	06-03-2014	06-03-2014
34.	Mustafa Kamal	Naib Qasid	Missing		18-04-1983	Shangla	21-03-2014	21-03-2014
35.	Nadeem Ahmad	Chowkidar	Metric	15302-6517191-9	04-04-1995	Dir Lower	15-09-2014	15-09-2014
36.	Said Nawab	Chowkidar	Matric	15102-0350775-7	03-03-1994	Buner	02-10-2014	25-11-2015
37.	Fazal Haq	Chowkidar	B. A	15306-3685480-9	02-05-1983	Dir Lower	26-11-2014	26-11-2014
38.	Shafi Ullah	Field Watcher	Matric	15701-0602316-9	10-04-1990	Dir Upper	24-02-2015	16-02-2015
39.	Roohullah	Field Watcher	Matric	15704-5648153-3	01-01-1991	Dir Upper	24-02-2015	16-02-2015
40.	Asad Ullah	Naib Qasid	B. A	15701-2291214-3	08-02-1992	Dir Upper	24-02-2015	16-02-2015
41.	Shamsul Hassan	F/W	F. A	15201-6816377-3	03-03-1991	Chitral	01-04-2015	01-04-2015
42.	S. Muneer Ali	F/W	Matric	15201-0876166-1	02-02-1993	Chitral	01-04-2015	01-04-2015
43.	Saifur Rehman	Naib Qasid	Matric	15201-1507009-1	17-10-1976	Chitral	01-04-2015	01-04-2015
44.	Muhammad Osman	Chowkidar	Matric	15202-5795427-7	-	Chitral	01-04-2015	01-04-2015
45.	Asad Ali	Field Watcher	Matric	15701-2195922-1	20-04-1997	Dir Upper	04-06-2015	04-06-2015
46.	Taj Nabi	Field Watcher	F. A	42101-8774454-3	04-01-1989	Torghar	31-07-2015	03-08-2015
47.	Zakirullah	Field Watcher	F.A	13502-6816222-7	04-03-1991	Torghar	31-07-2015	03-08-2015
48.	Gul Malik Khan	Field Watcher	Metric	13601-0500968-5	15-04-1994	Torghar	31-07-2015	03-08-2015
49.	Anwar Ali	Field Watcher	F. A	16202-0861078-7	15-02-1983	Swabi	01-11-2015	01-11-2015
50.	Raj Mohammad	Field Watcher	F.Sc	15402-7462757-3	04-02-1987	Malakand	09-12-2015	09-12-2015
51.	Muhammad Amin	Field Watcher	Matric	42401-1638926-9	06-09-1982	Swabi	31-03-2017	31-03-2017
52.	Ahmad zaman	Field Watcher	Metric	13302-4262875-1	26-04-1993	Haripur	01-04-2017	01-04-2017
53.	Sheryar Ahmad	Field Watcher	B.Sc	15607-0362542-7	15-02-1997	Swat	31-08-2017	31-08-2017
54.	Taib Rehman	F/W	Matric			Hangu	13-10-2017	
55.	Minhajudin	Chowkidar	B.A			Hangu	14-10-2017	
56.	Amjid Ahmad	Field Worker	Metric	17201-2187918-7	10-04-1977	Nowshera	09-11-2017	09-11-2017
57.	Haris Hussain	Field Worker	F.SC	17201-7968349-1	29-04-1997	Nowshera	13-11-2017	13-11-2017
58.	Saad Ali Shah	Chowkidar	Metric	17201-8371422-5	03-10-1995	Nowshera	13-11-2017	13-11-2017
59.	Rahayat Shah	Chowkidar	Metric	17201-2264822-9	06-08-1981	Nowshera	13-11-2017	13-11-2017
60.	Taimur jan	F/W (BPS 3) -	S.S.C	17101-4766248-5	06/02/1999	Charsadda	07-12-2017	07-12-2017
61.	Riaz Muhammad	Field Watcher	Metric	17201-2368555-5	17-06-1984	Nowshera	05-01-2018	05-01-2018
62.	Farooq Ahmad	Field Watcher	Matric	12201-8921512-7	02-07-1999	Tank	06-02-2018	07-02-2018
63.	Mohammad Qaiser	Chowkidar	F.A	13101-3425879-7	24-02-1984	Abbottabad	02-07-2018	02-07-2018
64.	Yousaf khan	Chowkidar	Matric	12201-4159284-9	07-03-1996	Tank	30-07-2018	30-07-2018
65.	Muhammad Noman	Naib Qasid	MBA	13503-1368730-7	26-02-1989	Mansehra	06-12-2018	06-12-2018
66.	Munir Ahmad	Field watcher	Matric	13503-0674613-3	01-11-1982	Mansehra	06-12-2018	06-12-2018

Muhammad
Shah
Superintendent
 To Director General
 Soil & Water Conservation
 KPK Peshawar

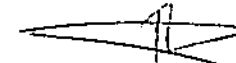
67.	Raza Muhammad Khan	Field Watcher	Matric	17102-5351510-7	28-01-1978	Charsadda	18-06-2019	18-06-2019
68.	Naveed Anjum	Field Watcher	MA	12101-8771738-1	02-04-1985	D.I. Khan	24-06-2019	24-06-2019
69.	Ali Rehman	Chowkidar	Metric	17101-0250378-1	12-05-1977	Charsadda	26-06-2019	26-06-2019
70.	Haidar Hayat	Field Watcher	F. A	14202-9780799-7	30-05-1991	Karak	23-07-2019	23-07-2019
71.	Kashif Shah	Chowkidar	F.SC	17301-2575897-9	10-03-1999	Peshawar	23-09-2019	23-09-2019

Certified that the above list is final and undisputed.

End: No. 09 /DGSC/KP

dated at Pesh: the 01/01 /2024

Copy forwarded to all Concerned Officials for information.



DIRECTOR GENERAL
SOIL & WATER CONSERVATION,
KHYBER PAKHTUNKHWA,
PESHAWAR

Attested

[Signature]
Superintendent
To Director General
Soil & Water Conservation
KPK Peshawar