

BEFORE THE LEARNED SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 662 of 2024

Akhtar Hussain s/o Shah Jehan, Senior Research Officer, Agriculture Department
R/O Mohalla: Bakhtmand Khan, Village Rahim Abad, Tehsil Babuzai, District
Swat

..... Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. Secretary, Agricultural Govt. of Khyber Pakhtunkhwa, Peshawar.
3. Director General: Agriculture Research, Peshawar
4. Director Agriculture Research Institute, Swat

..... Respondents

INDEX *****

S. No.	Documents	Annexure	Page No.
1.	Para-wise reply/comments on behalf of Respondents 1,2, 3 & 4	--	1-7
2.	Affidavit	--	08
3.	Authority Letter	--	09
	Judgment/order dated 12.10.2022 in case titled: Civil Petition No. 3813/2019: Ijaz Badshah <i>versus</i> The Secretary Establishment Division Govt. of Pakistan & Others	A	10-15
4.	Copies of Absentee Notices	B1-B3	16-18


Dr. Roshan Ali

Director Agriculture Research Institute Mingora Swat

(Respondent No. 4)

BEFORE THE LEARNED SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 662 of 2024

Akhtar Hussain s/o Shah Jehan, Senior Research Officer, Agriculture Department
R/O Mohalla: Bakhtmand Khan, Village Rahim Abad, Tehsil Babuzai, District Swat

..... Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. Secretary, Agricultural Govt. of Khyber Pakhtunkhwa, Peshawar.
3. Director General: Agriculture Research, Peshawar
4. Director Agriculture Research Institute, Swat

..... Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS: 1 to 4

Respectfully Sheweth:-

Preliminary Objections

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 17930

Dated 14-11-24

1. That as per rules every memorandum of the appeal shall be signed by the appellant.
2. That the instant appeal is barred by law and limitation.
3. That being civil servant, the appellant proceeded abroad without securing NOC and approval from the Competent Authority.
4. That vide judgment/order dated 12.10.2022 in case titled: Civil Petition No. 3813/2019: Ijaz Badshah *versus* The Secretary Establishment Division Govt. of Pakistan & Others, the Hon'ble Supreme Court of Pakistan upheld the judgment of Federal Service Tribunal (Annex-A). The petitioner in that very case too proceeded abroad without securing NOC and approval of the competent authority. Therefore, consistency warrants dismissal of this appeal also.
5. That the instant service appeal is based on illegal demands against the respondents, hence, the instant appeal is strange, alien and not maintainable in its present form and liable to be dismissed.
6. That the appellant wishes to waste the precious time of this Hon'ble Court by filing the instant service appeal which is barred by limitation
7. That the appellant has got no prima facie to file the instant appeal.
8. That the appellant has no locus standi and this instant appeal warrants dismissal in *limine*.
9. That the appellant has deliberately concealed the important facts from this Hon'ble Tribunal.

ON FACTS: -

- Para-1 No comments, it pertains to record (service history of the appellant)
- Para-2 Correct to the extent that the appellant was granted 150 days leave (90 days on full average pay and 60 days on half average pay) w.e.f 01.08.2018 vide notification dated October 01, 2018.
- Para-3 Not admitted. **The appellant proceeded abroad without securing proper NOC and approval of the Competent Authority.** Moreover, the appellant didn't attach any of the following documents

- *Recommendation report from one of local hospitals/Maternity hospitals and or Gynecologist etc mentioning that treatment of appellant's wife is not possible here in Pakistan so she may travel to Canada for treatment.*
- *Medical report of foreign treatment/any medical documents (duly attested by the Embassy of CANADA)*

The appellant is in fact trying to justify the illegality of his travelling abroad without securing NOC and approval on the pretext that due to illness of his wife's health condition, he travelled abroad.

Similarly, it was considered meticulously on the strength of the available record (as attached with the instant appeal) where only some photocopies of medical history/reports of the appellant's wife were attached and it is overtly observed that all the medical certificates/reports are issued by local Gynecologist, and nothing was brought on record which may transpire or substantiate that at any point in time the wife of the appellant was under the care and treatment of a hospital located in any foreign country especially CANADA.

- Para 4-5 Incorrect. The appellant after submitting his arrival again went missing without any approval/sanctioned leave. Moreover, dates of the mentioned letters dated 30.04.2019 and 17.06.2019 will clarify the position in a better way and shall not grant the appellant any condonation in respect of law.

Furthermore, it is also an admitted fact that the appellant travel abroad without securing NOC and the appellant could not produce documentary evidence in the shape of approval of Ex-Pakistan leave/NOC to justify his travelling abroad.

Para-6 Not admitted. Hence, denied. The conduct of the appellant explicates that despite having full knowledge of being a civil servant in BPS-18, he was not allowed to travel abroad without securing NOC and approval of the competent authority. This act of the appellant of travelling abroad without NOC comes under grave misconduct.

Para 7-8 Not admitted. There is no cavil that the appellant again moved abroad in July, 2019 without securing NOC/leave approval from the competent authority and his assertions are misconceived. The appellant is just trying to justify the illegality on the pretext that, due to profound grief, shock and sense of loneliness of his wife, the appellant travelled abroad, which seems to have no legal logic in it, as moving abroad without NOC and ex-Pakistan leave is truly a grave misconduct and punishable offence under the law/rules.

Moreover, attention of this Learned Tribunal is once again brought to this very point that the conduct of the appellant explicates that, despite having full knowledge, that being a civil servant in BPS-18, he was not allowed to travel abroad without securing NOC and approval issued by the competent authority, but he still travelled, which the appellant in a one fell swoop straight away accepted in the instant appeal, and this fact is obviously not deniable (Firstly, he travelled abroad during his sanctioned leave without NOC and secondly in July, 2019 also without securing NOC and ex-Pakistan leave).

Para 9 The appellant cannot bend his assertions for securing some sort of advantage from this Learned Tribunal. This fact is not deniable that the appellant being a civil servant in BPS-18 travelled to CANADA in July, 2019 without NOC and

remained absent from duty (which is indeed a grave misconduct). Therefore, he was liable to be proceeded for disciplinary action under Efficiency & Disciplinary Rules, 2011. Hence, the appellant was served upon absentee notices for his unauthorized willful absenteeism and directed him to join his duties within 15 days. The appellant failed to comply with directions to join duty in stipulated time. Hence while observing all codal formalities and following the procedure envisaged in Rule-9 of the E&D Rules, 2011, the "Removal From Service" order was issued.

Copies of absentee notices (served on home address and in newspapers) are attached as Annex: B1-B3

Para 10 Incorrect as laid. The appeal was barred by law and limitation. The appellant preferred his very first appeal on November 06, 2020 after laps of more than two months from his removal order. Moreover, the instant appeal before this Learned Tribunal is also barred by law and limitation which is filed after laps of four (4) years.

Moreover, his appeal was filed vide letter dated 05/04/2024, the body which is reproduced as under;

"I am directed to refer to your application addressed to the Secretary Agriculture Department on the subject noted above and to state that you were required to submit review petition directly to the Hon`ble Chief Minister Khyber Pakhtunkhwa with in stipulated time under Rule-17 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 instead of addressing application to the Secretary Agriculture Department after laps of four (04) years

Your request/appeal is therefore filed at this stage being not covered under the rules/policy, please"

This very reply from the department does not grant the appellant any condonation in respect of law and limitation, in fact, both of his appeals are time barred.

Para 11 Incorrect as laid. The appellant was treated as per established law and rules in vogue. Moreover, as clearly mentioned in preceding para, his departmental appeal was barred by law and limitation, therefore, the same was filed.

GROUND: -

Para: a-b Not admitted, hence denied. As mentioned clearly in above paras, the appellant failed to comply with the directions to join duty in stipulated time. Hence, while observing all codal formalities and following the procedure envisaged in Rule-9 of the E&D Rules, 2011, the "Removal From Service" order was issued.


Para: c Not admitted. As mentioned in above paras, his departmental appeal was barred by law and limitation, therefore, the same was filed.

Para: d-e Incorrect as laid. The appellant is leveling false allegations against his authorities. The Hon`ble Supreme Court of Pakistan in series of judgments mentioned that absence of duty exhibits lack of devotion on part of an employee towards the duty, leading to indiscipline in the work culture of an organization and such act cannot be countenanced. Similarly, the *dicta* laid down in case of Ijaz Badshah (*supra*) is that "punishment in the case of gross misconduct is not only to maintain balance with the gravity of wrong done by a person but also to make an example for others as a preventive measure in order to maintain discipline for the general administration of the institution or organization".

Para: f No comments as details are given in aforementioned para: 09 of the facts.

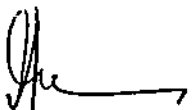
Para: g Not admitted. The appellant was treated as per established Government Laws & Rules and was never discriminated. As depicted from the record, the appellant

left for CANADA without NOC in July, 2019 and remained absent from duty. Therefore, as per established rules, the appellant was served upon absentee notices for his unauthorized willful absenteeism and directed him to join his duties within 15 days, which he failed to to comply with in stipulated time. Hence while observing all codal formalities and following the procedure envisaged in Rule-9 of the E&D Rules, 2011, the "Removal From Service" order was issued.

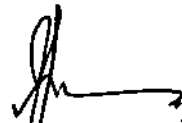
- Para: h No comments as details are given in aforementioned para 3 and 7-8 of the facts.
- Para: i No comments as details are given in aforementioned para 10 of the facts.
- Para: j-k No comments up to the extent that the appellant was awarded major penalty in the case of his gross misconduct (the appellant left for CANADA without NOC in July, 2019 and remained absent).
- Para: l No comments up to the extent that being a civil servant in BPS-18, the appellant was not supposed to leave his country without securing NOC and ex-Pakistan leave.
- Para: m Incorrect as laid. The punishment of removal from service in this case as awarded to the appellant is proportionate and reasonable to the act of misconduct committed by the appellant.
- Para: n-o  The appellant, however, indulge himself in an act of misconduct by travelling abroad without securing NOC/ex-Pakistan Leave.
- Para: p No comments as details are mentioned in above paras
- Para: q With prior permission of this Hon'ble Tribunal, necessary additional grounds and justifications will be provided at time of arguments.

It is therefore, humbly prayed that on acceptance of the above para-wise comments/reply, the instant appeal of the appellant may very graciously be dismissed with cost.

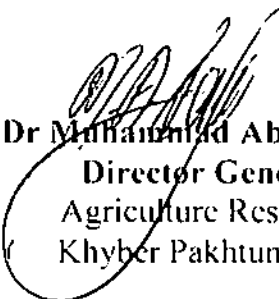
Respondent No. 1


Nadeem Aslam Chaudhry
Chief Secretary
 Govt. of Khyber Pakhtunkhwa, Peshawar


Respondent No. 2


Atta ur Rehman
Secretary
 Agriculture, Govt. of Khyber
 Pakhtunkhwa, Peshawar

Respondent No. 3


Dr Muhammad Abdul Rauf
Director General
 Agriculture Research
 Khyber Pakhtunkhwa

Respondent No. 4


Dr. Roshan Ali
 Director Agriculture Research
 Institute Mingora Swat

BEFORE THE LEARNED SERVICE TRIBUNAL PESHAWAR**SERVICE APPEAL NO. 662 of 2024**

Akhtar Hussain s/o Shah Jehan, Senior Research Officer, Agriculture Department
R/O Mohalla: Bakhtmand Khan, Village Rahim Abad, Tehsil Babuzai, District
Swat

..... Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. Secretary, Agricultural Govt. of Khyber Pakhtunkhwa, Peshawar.
3. Director General: Agriculture Research, Peshawar
4. Director Agriculture Research Institute, Swat

..... Respondents

AFFIDAVIT

I, Dr. Roshan Ali (Director Agriculture Research Institute, Swat) Respondent No: 04, do hereby solemnly affirms that the contents of para-wise reply/comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal. The same has also been vetted/approved by the District Attorney/AAG

It is further stated on the oath that in this appeal, the answering respondents have neither been placed *ex-parte* nor their defense has been struck-off/*cost*.



Dr. Roshan Ali
Director Agriculture Research Institute
Mingora Swat

ATTESTED

(Respondent No. 4)

CNIC# 15602202395147Mob# 03459457240

BEFORE THE LEARNED SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 662 of 2024

Akhtar Hussain s/o Shah Jehan, Senior Research Officer, Agriculture Department
R/O Mohalla: Bakhtmand Khan, Village Rahim Abad, Tehsil Babuzai, District
Swat

..... Appellant

Versus


5. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
6. Secretary, Agricultural Govt. of Khyber Pakhtunkhwa, Peshawar.
7. Director General: Agriculture Research, Peshawar
8. Director Agriculture Research Institute, Swat

..... Respondents


AUTHORITY

We the following hereby authorize Mr. Zia ur Rehman (Research Officer BS-17) o/o the Director Agricultural Research Institute Mingora Swat to submit reply/comments and appear on behalf of respondents before the Hon'ble Tribunal in the above case/appeal and also pursue the case on each and every date till final order/judgment.

He is also authorized to submit all relevant documents in connection with the above case.


Dr Muhammad Abdul Rauf
Director General
Agriculture Research
Khyber Pakhtunkhwa

(Respondent No. 3)


Dr. Roshan Ali
Director Agriculture Research
Institute Mingora Swat

(Respondent No. 4)

IN THE SUPREME COURT OF PAKISTAN
(Appellate Jurisdiction)

PRESENT

Mr. Justice Sardar Tariq Masood
Mr. Justice Amin-ud-Din Khan
Mr. Justice Muhammad Ali Mazhar

Civil Petition No. 3813/2019

(Against the judgment dated 24.07.2019 of the
Federal Service Tribunal, Islamabad passed in
Appeal No. 1860(R)CS/2017)

Ijaz Badshah*Petitioner(s)**Versus*

***The Secretary, Establishment Division, Govt. of
Pakistan, Cabinet Block, Constitution Avenue,
Islamabad & others*** *Respondent(s)*



For the Petitioner(s) : Mr. Abdul Rahim Bhatti, ASC
For the Respondent(s) : Not Represented
Date of Hearing : 12.10.2022

JUDGMENT

Muhammad Ali Mazhar, J. This Civil Petition for leave to appeal is directed against the judgment dated 24.07.2019 passed by the learned Federal Service Tribunal, Islamabad ("**Tribunal**") in Appeal No. 1860(R)CS/2017 with Miscellaneous Petition, whereby the Service Appeal along with the Miscellaneous Petition was dismissed.

2. The transitory facts of the case are that the petitioner was performing his duties as Secretary (PCS/BS-19) in the Federal Board of Revenue, Islamabad. He challenged the notification of major penalty of his dismissal from service issued on 07.10.2016 by the Secretary (Mgt-Customs-II), Federal Board of Revenue, Government of Pakistan ("**Notification**"). For the ease of convenience, the charge sheet/statement of allegations issued to the petitioner is replicated as under:-

*a) That you were granted one month leave by Customs Wing, FBR w.e.f. 09.07.2014. On the expiry of said leave,



TOUHEED IQBAL
Senior Research Officer
Directorate General Agriculture
Research Peshawar

(11)

you again submitted application dated 05.08.2014 for further extension of 04 weeks and then the application dated 22.09.2014 for grant of leave upto 30.10.2014 (calculates period 01 month and 24 days). But at your own will, you remained absent without getting it approved from the Competent Authority/Member (Admn) and issuance of leave Notification by the Management Wing.

b) That you are availing of un-authorized leave w.e.f. 09.08.2014 as reported by the Customs Wing FBR.

c) That is evident from the record (FIA's report) that you are holding various passports bearing Nos. KC869353, AF3417801 KG656679, SS609689 and AF3417802 for which you did not obtain any departmental permission/NOC for the purpose. You mis-declared your profession as "Business Owner" instead of "Government Servant" in the Passport(s).

d) That it is also revealed from the FIA's report that you proceeded abroad on 12.07.2014 on passport bearing No. AF3417802 via Flight No QR615 destined from Doha Qatar bypassing all norms of the Government rules/instructions, without taking prior permission. Moreover, you undertook frequent private visits of various foreign countries (e.g. Dubai-UAE, Glasgow-UK, Istanbul-Turkey, Doha-Qatar etc.) on different passports, without prior approval."

3. In response to the charge sheet/statement of allegations the petitioner sent his reply on 04.11.2014 in which he denied all the allegations, however, he remained absent and did not join the inquiry. After ex-parte inquiry, a further show cause notice was issued but the petitioner did not avail any right of personal hearing, and thereafter the dismissal order was passed.

4. The learned counsel for the petitioner at the very outset invited our attention to paragraph 11 of the impugned judgment of the Tribunal and entreated that, even before the Tribunal, the petitioner was not interested in obtaining reinstatement or setting aside the dismissal order, rather he requested the conversion of his penalty of dismissal from service into compulsory retirement. Before us as well he made a similar request that the dismissal order may be converted into compulsory retirement, but in one fell swoop he straight away admitted that the petitioner travelled abroad on different passports without securing NOC from the Government, but he tried to justify the illegality on the pretext that, due to illness of his mother, the petitioner travelled abroad and by reason of exigency he could not obtain the NOC. The learned counsel further argued, that while awarding the punishment on account of misconduct, the competent

Alleg

bc

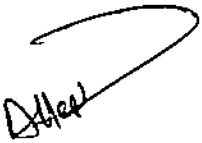
TOUHEED IQBAL
Senior Research Officer
Directorate General Agriculture
Research Peshawar

12

authority should have considered the doctrine of proportionality and reasonableness and in support of his contention he referred to the judgment of Sabir Iqbal vs. Cantonment Board, Peshawar (PLD 2019 SC 189).

5. When in a similar way the plea of the petitioner's mother's illness, which ensued in the travel without NOC or approval, was brought to the notice of the learned Tribunal, it was considered meticulously on the strength of the available record where only some photocopies of medical history/reports of the petitioner's mother were presented and the learned Tribunal overtly observed that all the medical certificates/reports are issued by local hospitals, and nothing was brought on record which may transpire or substantiate that at any point in time the mother of the petitioner was under the care and treatment of a hospital located in any foreign country.

6. No doubt this Court may examine and judicially review the executive discretion on the ground of proportionality and reasonableness but at the same time the gravity of the charges raised in the statement of allegations are also to be considered. The standard of unreasonableness *vis-à-vis* the exercise of powers under the doctrine of judicial review correlated to the judiciary's power to determine the constitutional legitimacy of laws and the lawfulness of decisions made by public bodies was dealt with and mulled over in the case of Associated Provincial Picture Houses Ltd. v. Wednesbury Corporation ((1948) 1 KB 223), which explicates that a reasoning or decision is unreasonable (or irrational) if it is so unreasonable that no reasonable person acting reasonably could have made it, whereas in the test of proportionality, the courts may quash the exercise of discretionary powers in which there is no reasonable relation between the objective which is sought to be achieved and the means used to that end, or where punishments imposed by administrative bodies or inferior courts are wholly out of proportion to the relevant misconduct. The Supreme Court of India in Civil Appeals Nos. 5675-5677/2007, Chairman, All India Railway Rec. Board v. K. Shyam Kumar and others have also discussed the principle laid down in the Wednesbury case, delineating the premise of unreasonableness and proportionality in the following terms:



TOUHEED IQBAL
Senior Research Officer
Directorate General Agriculture
Research Peshawar

(15)

Court is secondary unless the punishment imposed upon the delinquent employee is found to be unreasonable, disproportionate or against the law as it was found out by this Court in the case of Sabir Iqbal (supra). However, at the same time, the rationale of deterrent punishment in the case of gross misconduct is not only to maintain balance with the gravity of wrong done by a person but also to make an example for others as a preventive measure in order to maintain discipline for the general administration of the institution or organisation. If in such cases of grievous misconduct any latitude is shown for conversion of penalty, then it would also seriously prejudice the discipline of the civil servants service structure. The punishment of dismissal from service in this case awarded to the petitioner is proportionate and reasonable to the act of misconduct committed by the petitioner, hence he does not deserve any indulgence for conversion of his punishment from dismissal of service to compulsory retirement.



10. As a result of the above discussion, we do not find any illegality, perversity or impropriety in the impugned judgment. The petition is therefore dismissed and leave to appeal is refused.

Judge

Judge

Judge

Islamabad, the
12th October, 2022
Rizwan
Approved for reporting.



ALI UZ ZUHEED IQBAL
Senior Research Officer
Directorate General Agriculture
Research Peshawar

Annex - B1



GOVERNMENT OF
KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE
DEPARTMENT

599
12/1

NO.SOE(AID)I-170/2012
Dated Peshawar, the 6th November, 2019

To

Mr. Akhtar Hussain Shah S/o Shah Jehan,
Senior Research Officer (BPS-18),
Office of the Director Agriculture Research Institute,
Mingora-Swat.

Mailing Address: - Mr. Akhtar Hussain Shah S/o Shah Jehan,
Village Rahim Abad Mohallah Bakht Mand Khan,
Tehsil Babozai District Swat.

SUBJECT: - ABSENCE FROM DUTY.

I am directed to refer to the subject noted above and to state that it has been reported by Director General Agriculture (Research) Khyber Pakhtunkhwa, Peshawar vide letter No. 7265-66/Estt/DGAR dated 16.04.2019 that after availing of 150 days earned leave, (90 days on full pay and 60 days on half pay) w.e.from 01.11.2018 to 31.03.2019, you have not reported for duty and willfully absented yourself from official duties w.e.f 01.04.2019 without any reason/permission of the competent authority.

You are therefore directed to report for duty within 15 days on receipt of this letter and explain the reasons for your willful absence from duty, failing which disciplinary action would be initiated against you under Khyber Pakhtunkhwa Government Servants (E&D) Rules 2011.

[Handwritten signature]

TOUHEED IQBAL
Senior Research Officer
Directorate General Agriculture
Research Peshawar

[Handwritten signature]
(SHAMS-UL-ISLAM)
SECTION OFFICER-ESTT:
06/11/19

Endst. of even No. & Date.

1. The Director General, Agriculture Research, Khyber Pakhtunkhwa, Peshawar w/r to his letter No. 5187-88/Estt/DGAR dated 22.10.2019 for information and with the request to convey the same to the Mailing Address of the officer please.
2. P.S to Secretary Agriculture department.
3. PA to Deputy Secretary (Admn), Agriculture Department.
4. Master File.

[Handwritten signature]
SECTION OFFICER-ESTT:

DGAR

AOE

11/11/2019

APR 10/11/19



پاکستان کے 11 شہروں سے ایک وقت شائع ہونے والا واحد اخبار
 پتہ: 59، شہر 73، جمالی لاول، 1441، 9، فورس 2020، نمبر 12، قیمت 20 روپے

حکومت خیبر پختونخوا، محکمہ زراعت، امور حیوانات و امداد باہمی

ہرگاہ آپ اختر حسین شاہ ولد شاہ جہان سینئر ریسرچ آفیسر (BPS-18) زرعی تحقیقی انسٹیٹیوٹ منگورہ سوات اپنی جائے ڈیوٹی سے 01.04.2019 سے بغیر کسی منظوری کے مسلسل غیر حاضر ہو۔ آپ کو بذریعہ چٹھی نمبر SOE(AD)1-170/2012 مورخہ 06.11.2019 مطلع کیا گیا تھا کہ اپنی ڈیوٹی کی جگہ پر حاضری کریں لیکن آپ نے سرکاری احکام پر عملدرآمد نہیں کیا۔ آپ کو بذریعہ اخباری نوٹس ہذا مطلع کیا جاتا ہے کہ اس نوٹس کی اشاعت کے پندرہ یوم کے اندر اندر اپنی ڈیوٹی پر حاضر ہو جائیں اور اپنی غیر حاضری کی معقول وجوہات بیان کریں بصورت دیگر آپ کے خلاف نظم و ضبط کے قواعد مجریہ 2011 کے ذیلی قاعدہ 9 کے تحت انضباطی کارروائی عمل میں لائی جائے گی جس کے نتیجے میں آپ کو سرکاری نوکری سے برخاست بھی کیا جاسکتا ہے۔

Attest
 Touheed Iqbal

TOUHEED IQBAL
 Senior Research Officer
 Directorate General Agriculture
 Research Peshawar



مہتمم

محکمہ زراعت و امور حیوانات و امداد باہمی
 حکومت خیبر پختونخوا پشاور

آپ کے

تک وہاں کی اشرافیہ کی خدمت کے نام پر ان کا خون چوتی رہے گی اسلئے آج سب پاکستانیوں کی خدمت میں عرض ہے کہ سستی اور غفلت کو ہنس پشت ڈال کر خوب لگن اور محنت سے تحصیل علم میں لگ جائیں۔
دکار احمد حقہ غلام

ہندوستانی نسل پرست
حکومت کا بغض باطن

ہندوستان کی نسل پرست حکومت نے ایک نیا نقشہ دنیا

یہ ہے کہ لڑائی دینا۔ جس پر پتہ نہیں ہے کہ اس کی طرف سے
مضبوط معاشی حالت کی وجہ سے تعلیم کا حصول قرار
دیا جاتا ہے یعنی دنیا بھر میں ہے کہ تعلیم کا ایک معاشی فائدہ
بھی ہے۔ پچاس کی دہائی میں جنوبی کوریا کا آج کی
افرتی ریاستوں سے بھی بڑا حال تھا۔ مردوں عورتوں
کیلئے مساوی تعلیم کے علاوہ شہرہ صحت میں سرمایہ کاری
نے وہاں کی اقتصادی ترقی میں اہم کردار ادا کیا ہے۔
چین کی تیز رفتار ترقی، تعلیم کے شعبے میں کی جائیداد
اصلاحات کے مردوں منت ہے۔ یہ علم کی وجہ سے ممکن
ہوگا کہ مستقبل میں کوئی بھی غیر دستوری حکومت، اس
قابل نہیں ہوگی کہ وہ تعلیم یافتہ اکثریت کا مقابلہ کر
سکے۔ جب اتنی بڑی تعلیم یافتہ آبادی اس مقام پر آ
جائے گی تو جمہوری تبدیلی کیلئے ذمہ داری کا جہم بھی بڑھ
جائے گا۔ جن ملکوں کی زیادہ تر آبادی غربت کی زندگی بسر
کرتی ہے ان ملکوں میں تعلیم کی شرح آج بھی کم ہے۔
جب تک ایسے ملکوں کی اکثریت تعلیم سے محروم ہے تب

ہاں آپ نے ۱۹۷۲ اور ۱۹۷۳ کے وسط سے ارباب س
دھند کی توجہ اپنے ایک اہم مسئلہ کی جانب مبذول کروانا
چاہتا ہوں، جہاں کچھ مہتر سے ذہن کا جا رہا ہے کہ معاشی
کا نظام بالکل خراب ہے جگہ جگہ گندگی کے ڈھیر لگے
ہوئے ہیں جس سے نکلنے پڑے اور نقصان سے ہر کوئی تالاں
ہیں جبکہ یہاں کی معاشی کا کوئی مناسب بندوبست نہیں
کیا جا رہا ہے جبکہ دوسرا بڑا اہم مسئلہ یہ ہے کہ یہاں آوارہ
کوتوں کی بڑی بھرا ہے جس سے مقامی لوگوں کا علاقہ
میں پیدل چلنا اور سودا سلف کیلئے گھروں سے باہر جانا
بھی محال ہے۔ والدین کو ہر وقت دھڑکا دکھاتا ہے کہ
بچے صحیح سلامت گھروں کو واپس آئیں گے۔ کئی مرتبہ
شکایت کی اور پرنٹ والیکٹرک میڈیا پر بھی اس اہم
مسائل کو اجاگر کیا لیکن کوئی شنوائی نہیں ہوئی۔ میری
متعلقہ حکام سے گزارش ہے کہ ان مسائل کا فوری نوٹس
لے کر مل کیا جائے تاکہ مقامی لوگ سکھ کا سانس لیں۔
شاہد علی پٹا اور یونیورسٹی کیپس

18

19850	-do-	-do-
0 17850	-do-	-do-
2 16890	-do-	-do-
0 15850	-do-	-do-
0 10250	-do-	-do-
0 15250	-do-	-do-
56 82962	-do-	-do-
10 17850	-do-	-do-
10 13850	-do-	-do-
10 8250	-do-	-do-
10 7250	-do-	-do-
10 17850	-do-	-do-
10 9250	-do-	-do-

تصحیح ٹینڈر نوٹس
INF(P)5208/19 مورخہ 20-12-2019 روزنامہ مشرق
بحوالہ اشتہار ٹینڈر نوٹس INF(P)5208/19 برائے یونیفارم دیر لیویز
دیر پائین روزنامہ مشرق پشاور جس میں تاریخ مقررہ مورخہ
15/01/2019 کو 15/01/2020 لکھا اور پڑھا جائے اور آخری
جملہ بابت دوسری بار ٹینڈر کو حذف کیا جاتا ہے۔

ڈپٹی کمشنر
کمانڈنٹ دیر لیویز دیر پائین
INF(P)5208/19

حکومت خیبر پختونخوا، محکمہ
زراعت، امور حیوانات و امداد باہمی
ہر گاہ آپ انجمن شاہ ولد شاہ جہان سینٹر ریسرچ آفیسر (BPS-18) زوی تحقیق
انجمنیوں کی صورت میں اپنی جائے ذیولتی سے 01.04.2019 سے بغیر کسی منظوری کے
مسلحہ غیر حاضر ہو۔ آپ کو بذریعہ چٹھی نمبر SOE(AD)1-170/2012 مورخہ
06.11.2019 مطلع کیا گیا تھا کہ اپنی ذیولتی کی جگہ پر حاضری کریں لیکن آپ نے
سرکاری احکام پر عملدرآمد نہیں کیا۔ آپ کو بذریعہ اخباری نوٹس پتہ مطلع کیا جاتا ہے کہ اس
نوٹس کی اشاعت کے چند روزوں کے اندر اندر اپنی ذیولتی پر حاضر ہو جائیں اور اپنی غیر حاضری
کی منقولہ وجوہات بیان کریں بصورت دیگر آپ کے خلاف قلم بھینٹ کے قواعد بحریہ
2011 کے ذیلی قاعدہ 9 کے تحت انضباطی کارروائی عمل میں لائی جائے گی جس کے نتیجے
میں آپ کو سرکاری نوکری سے برخاست بھی کیا جاسکتا ہے۔

محکمہ زراعت و امور حیوانات و امداد باہمی
حکومت خیبر پختونخوا، پشاور

MOJIB IQBAL
Research Officer
Associate General Agriculture
Research Peshawar

12/11/2019