



TRANSPARENCY INTERNATIONAL - PAKISTAN

October 28, 2025

Ms. Maryam Nawaz Sharif,
Chief Minister Punjab,
CM House, Lahore

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TL2024/1028/1A

Subject: Complaint Against Illegal Deforestation for commercial purposes in Jand, District Attock in Violation of the Punjab Forest Act, 1927 and the Punjab Environmental Protection (Amendment) Act, 2012

Dear Madam,

Transparency International Pakistan has received a complaint pertaining to illegal deforestation for commercial purposes in Jand, District Attock, in violation of the Punjab Forest Act, 1927 and the Punjab Environmental Protection (Amendment) Act, 2012, resulting in severe environmental degradation, loss of biodiversity, soil erosion, and depletion of vital natural resources in the region.

The complainant has made the following allegations that;

1. That large-scale illegal logging operations are taking place across villages in Jand and adjoining areas of northern Attock district. Truckloads of freshly cut timber are transported daily to markets in Kohat, Swabi, and Peshawar.
2. The illegal operations are carried out during late hours to evade forest department checks, with the alleged collusion of certain local officials and police personnel.
3. Punjab's total forest cover accounts for approximately 3 percent of the province's land (about 0.5 million hectares), as per the Punjab State of Environment Report 2024. However, data from Global Forest Watch indicates a further loss of 125 hectares of natural forest between 2020 and 2024, reflecting the accelerating pace of deforestation.
4. The local administration has failed to take any action to stop the timber trucks.

Transparency International Pakistan Comments

Transparency International Pakistan has reviewed the allegations of the complaint. Prima facie, the allegations seem correct. Following are TI Pakistan's comments:

1. The illegal felling, cutting, and removal of trees constitute a clear violation of Section 26(1)(c), (e), (f), and (q) of the Punjab Forest Act, 1927 (as amended), which prohibits unauthorized cutting, damage, or commercial conversion of forest timber, and prescribes penalties for such offences, including imprisonment of up to six months or a fine not less than the value of the damage caused, or both.
2. The large-scale deforestation and environmental degradation caused by the timber sell also fall within the ambit of Section 16(1) of the Punjab Environmental Protection (Amendment) Act, 2012, which empowers the Provincial Environmental Protection Agency to take immediate action against any act or omission likely to cause an adverse environmental effect. The Rule is quoted below for your reference;

16. Environmental protection order.- 72[(1) Where the Provincial Agency is satisfied that the discharge or emission of any effluent, waste, air pollutant or noise, or the disposal of waste, or handling of hazardous substance, or any other act or omission is likely to occur, or is occurring, or has occurred, in violation of any provision of this Act, rules or regulations or of the conditions of a license, or is likely to cause, or is causing, or has caused an adverse environmental effect, the Provincial Agency may, after giving the person responsible for such discharge, emission, disposal, handling, act or omission an opportunity of being heard, by order, direct such person to take such measures as the Provincial Agency may consider necessary within such period as may be specified in the order.]

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3. As a signatory of Paris Agreement and the fifth most vulnerable country to climate change, Pakistan is obligated to preserve its forest ecosystems and natural vegetation, which serve as vital carbon sinks and buffers against climate change. Deforestation and illegal tree cutting undermine these commitments and accelerate land degradation, desertification, and loss of biodiversity.

Transparency International Pakistan Recommendations

Transparency International Pakistan requests the Chief Minister Punjab to examine the allegations of the complaint in light of Punjab Forest Act, 1927, the Punjab Environmental Protection (Amendment) Act, 2012, and applicable laws, and if found correct, issue directives to take action against the illegal cutting of trees.

Transparency International Pakistan is striving for across-the-board application of the Rule of Law, which is the only way to stop illegal practices and achieve Zero tolerance against corruption.

Regards,


Advocate Daniyal Muzaffar,
Trustee/Legal Advisor
Transparency International Pakistan

Copies forwarded for the information with request to take action under their mandate to:

1. Chief Secretary, Government of Punjab, Lahore
2. Director General, Environmental Protection Agency, Punjab, Lahore.
3. DG, Provincial Disaster Management Authority, Punjab, Lahore.

Note:

This is to clarify that Transparency International Pakistan is not a complainant, it acts as a whistleblower and operate under Article 19-A, of the Constitution of Pakistan which gives the right to public to know how government is being run by public officers. Article 19-A makes the right to access of information pertaining to a public authority a fundamental right, and a three member bench in case of Mukhtar Ahmad Ali vs the Registrar, Supreme Court of Pakistan, Islamabad, headed by Chief Justice Qazi Faez Isa in the landmark judgment on 16 October 2023, in CP No. 3532/2023, has declared that

“What previously may have been on a need-to-know basis Article 19A of the Constitution has transformed it to a right-to-know, and the Access to information is no longer a discretion granted through occasional benevolence, but is now a fundamental right available with every Pakistani which right may be invoked under Article 19A of the Constitution”