

IN THE ELECTION COMMISSION OF PAKISTAN

Representation No. \_\_\_\_/2018

(Through Secretary)

SUBJECT: - REPRESENTATION CUM OBJECTIONS IN TERMS OF SECTION 21 OF THE ELECTIONS ACT, 2017 R/W RULE 12 OF ELECTION RULES, 2017 FURTHER R/W ARTICLE 218 (3) OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973.

The applicant most respectfully submits as under: -

1. That the applicant is a registered voter of Tehsil Gwadar District Gwadar Balochistan (Block Code No. 482090207, Silsila No. 22 Electoral area Mir Lal Baksh Ward) now part of PB-51 and NA-272, as such, interested in democratic norms, election in the country, particularly in the delimitation of his own constituency, hence has a right to make representation and raise a voice against incorrect delimitation process.
2. That the above constituency is part of Balochistan which is the largest province in measurement but smallest in population, the area of this part of country is 3,47,190 Square Kilometers while the population is 12,344,739, to National Assembly sixteen general seats have been allocated for Balochistan in the forthcoming elections, whereas three are meant for women. Similarly, in Provincial Assembly fifty-one seats of Provincial Assembly's candidates are to be elected directly while eleven and three seats have been reserved to women and the minorities respectively.

3. That the constituencies of National Assembly in Balochistan are based on some data which has recently been notified by this Commission, detail whereof is given below: -

Ser	NA	Area	Districts	Population
i).	257	Killa Saifullah cum Zhob cum Sherani	a) Killa Saifullah b) Zhob c) Sherani	806474
ii).	258	Loralai cum Musa Khail cum Ziarat cum Duki cum Harnai	a) Loralai, b) Musakhail, c) Ziarat, d) Duki, e) Harnai	821856
iii)	259	Dera Bugti cum Kohlu cum Barkhan cum Sibi cum Lehri	a) Dera Bugti, b) Kohlu, c) Barkhan, d) Sibi, e) Lehri	950056
iv).	260	Nasirabad	Nasirabad	492609
v).	261	Jaffarabad cum Sohbat Pur	a) Jaffarabad b) Sohbatpur	714351
vi).	262	Kachi cum Jhal Magsi	a) Kachi b) Jhal Magsi	386255
vii).	263	Pishin	Pishin	736481
viii).	264	Killa Abdullah	Killa Abdullah	757578
ix).	265	Quetta-I	Quetta	728296
x).	266	Quetta-II	Quetta	797994
xi).	267	Quetta-III	Quetta	749409
xii).	268	Mastung cum Chagai cum Kalat cum Shaheed Sikandarabad cum Noshki	a) Mastung b) Chagai, c) Kalat, d) Shaheed Sikandarabad, e) Noshki	1083497
xiii).	269	Khuzdar	Khuzdar	802207
xiv).	270	Panjgur cum Washuk cum Kharan cum Awaran	a) Panjgur, b) Washuk, c) Kharan, d) Awaran	770754
xv).	271	Kech	Kech	909116
xvi).	272	Lasbella cum Gwadar	a) Lasbella, b) Gawadar	837806

4. That similar detail in Provincial Assembly (PB) is given below: -

4-5

PB	Area	Population
1	Sherani	153116
2	Zhob	310544
3	Killa Saifullah	342814
4	Musakhail	167017
5	Loralai	244400
6	Duki	153000
7	Ziarat cum Harnai	257439
8	Sibi cum Lehri	251547
9	Barkhan	171556
10	Kohlu	214350
11	Dera Bugti	312603
12	Nasirabad-I	249492
13	Nasirabad-II	243117
14	Jaffarabad-I	252611
15	Jaffarabad-II	261202
16	Sohbat Pur	200538
17	Jhall Magsi	149225
18	Kachhi	237030
19	Pishin-I	241886
20	Pishin-II	244757
21	Pishin-III	249838
22	Killa Abdullah-I	182851
23	Killa Abdullah-II	167404
24	Killa Abdullah-III	407323
25	Quetta-I	237598
26	Quetta-II	267654
27	Quetta-III	223044
28	Quetta-IV	265628
29	Quetta-V	260187
30	Quetta VI	272179
31	Quetta VII	247459
32	Quetta VIII	278446
33	Quetta IX	223504
34	Nushki	178796
35	Chagai	226008
36	Mastung	266461
37	Shaheed Sikandarabad	200752
38	Kalat	211480
39	Khuzdar-I	273999
40	Khuzdar-II	271466
41	Khuzdar-III	256742
42	Washuk-cum-Kharan	332358
43	Panjgur	224111
44	Awaran-cum-Panjgur	214285
45	Kech-I	233765
46	Kech-II	241277
47	Kech-III	204916

6

48	Kech-IV	229158
49	Lasbela-I	282359
50	Lasbela-II	291933
51	Gawadar	263514

5. That reason to reproduce the details of para No.3 & 4 in this representation is to highlight many things unnatural, i.e. areas, population etc. of some constituencies which are apparent on the face of record.

6. That for the purpose of this representation cum objections NA-272 Lasbela-Cum-Gwadar is the subject matter, historically in 1985 Gwadar has an independent seat, it never been a part of Lasbela which is far away as in between the two areas, there is distance of around 449Km, both have separate administrative entities, the people of both the areas never visit the area of other as they are not inter dependent.

7. That according to the previous delimitation Gwadar is connected with Kech and declared as a combined seat of Kech and Gwadar as Kech-Cum-Gwadar (NA-272) which is short in distance and people of both areas are tightly coupled with each other by culture, business and demographically.

8. That by merging Lasbela and Gwadar District/ Administrative Unites, with hard to exist communication facilities, politically impracticable for democratic representation, the ECP has violated its Four key principles that the Constituency shall be

- a. Practicable
- b. Distribution of Population in Geographically Compact Area
- c. Existing Boundaries of Administrative Units

7

d. Facilities of Communication and Public Convenience

9. That preliminary Proposal is in clear violation of the statutory principles of Section 20 of the Elections Act, 2017. As per subsection (1) of Section 20 of the Elections Act, 2017 there is no need to disturb existing boundaries of administrative units as this practice is observed almost in all the districts of Balochistan Province, but this principle has been violated in the constituency in Question, hence not sustainable.

10. That in the circumstances, the petitioner being a registered voter of NA/PB in question i.e. NA-272 and PB-51 is aggrieved/interested to correct the wrong made in preliminary delimitation to file this representation cum objection on the following amongst other grounds: -

GROUND S

- A. That till now the final census report has not been published, as such, the whole exercise appears to be premature.
- B. That preliminary list of National / Provincial Assembly constituencies of District Gwadar have been made in violation of Section 20 of the Elections Act, 2017. As per subsection (1) of Section 20 of the Elections Act, 2017 there is no need to disturb existing boundaries of administrative units as this practice is observed in almost all districts of Balochistan Province, but this has been violated here.



- C. That the maps of the constituencies prepared by this Commission have been supplied late besides are incorrect and do not tally with the maps of Survey department even it is not in consonance of Goggle maps, hence the commission may be looked into.
- D. That the criteria meant in the Elections Act, 2017 and the rules have been ignored resulting miscarriage of justice.
- E. That a part of Lasbela district has been merged in the constituency in question but this area is far away as compare to Kech and Gwadar and not connected directly with the remaining part of the constituency in question, so it is to be considered.
- F. That reasons to make the constituency would be the harmony between the local population and their convenience which principle has been violated while notifying the preliminary constituencies, hence required to be corrected.
- G. The proposed constituency already formed is not in consonance of Section 20 of the Elections Act, the distance between its area are very far while the areas of proposed constituency are near to each other as such more viable.
- J. That a part of the above the CPEC route is in between the proposed area of the constituency Though it is a compact unit now but probably it remains as such hence full fil the need of future also.

9

- K. That needless to point out that Gwadar, Kech and Awaran are the most disturb area of the Balochistan with regard to militancy but when the grievances of its people are readdressed then everything will be calm and proper, hence this commission may have looked into.
- L. That the following may be the appropriate options for making of the constituencies;

Ser	Areas	Population
1	Gwadar, PB-47 and PB-48	697,588
2	Gwadar, PB-45 and Awaran	619,290
3	Gwadar, PB-45 and PB-47	702,195

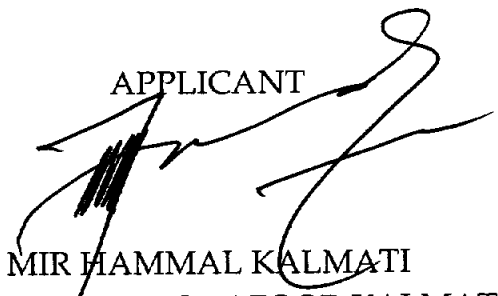
- M. That it is strange that two constituencies of the Balochistan are having less then four lac population which doesn't meet the required criteria, in fact both of it i.e NA-262 (Kachi-Jhalmagsi) and NA-260 (Nasirabad) has / had to be made one and the same constituency and in that case another constituency could be created by this commission to accommodate the deserving area.

- 10 -

It is, therefore, respectfully prayed that preliminary delimitation of NA- 272 may be revised, and out of the following proposal anyone be made as constituency in Question.

Ser	Areas	Population
1	Gwadar, PB-47 and PB-48	697,588
2	Gwadar, PB-45 and Awaran	619,290
3	Gwadar, PB-45 and PB-47	702,195

APPLICANT



MIR HAMMAL KALMATI  
S/O MIR ABDUL GHAFOOR KALMATI  
ADDRESS: HOUSE NO. 115 STREET 9  
PHASE-6 KHAYABAN-E-BUKHARI DHA  
KARACHI, SINDH  
MOBILE NO. 03244004445

DATED: 03-2018