

M/02/09/2018

**OBJECTIONS ON THE CONSTITUENCIES OF P.S 35 and P.S 36,
of District Naushahro Feroze.**

1. The total population of the District Naushahro Feroze is **16,12,373**. District Naushahro Feroze consists of two Seats of National Assembly bearing N.A No. 211 and 212 and four seats of Provincial Assembly i.e. P.S 33, P.S 34, P.S 35 AND P.S 36, allocated by the ECP. The population of the constituencies P.S 35 AND P.S 36 is at more variance than it should have been on the basis of rational division of the whole population of District Naushahro Feroze either on the basis of formula fixed by the ECP or on the basis average distribution or at proportionate distribution of the population between the constituencies of District Naushahro Feroze Sindh. Which comes to:

$$16,12,373 / 4 = 403,093.25 \text{ for each Provincial Assembly Seat}$$

$$16,12,373 / 2 = 806,186.50 \text{ for each National Assembly Seat}$$

2. The total population of PS-33, Naushahro Feroze-I by ECP, is **392,795** while the average number of population as per the formula fixed by Election Commission of Pakistan (ECP) is 403,093.
3. The total population of PS-34, Naushahro Feroze-II by ECP, is **396,214**. While the average number of population as per the formula fixed by Election Commission of Pakistan (ECP) is 403,093.

20 (3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.

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4. The delimitation of the constituency of P.S 33 and 34 have been carved out from Northern end of the District Naushahro Feroze and made Clock wise. The population in both the constituencies is in accordance with the ceiling fixed by the ECP. Hence both the constituencies need not be changed or amended in terms of their boundaries and population.
5. The total population of PS-35, Naushahro Feroze-III by ECP, is **429,980**. While the average number of population as per the formula fixed by Election Commission of Pakistan (ECP) is 403,093. Therefore, the same needs to be amended as proposed by the applicant in the following manner:

No. and Name of Constituency	Extent of Constituency Proposed	Population Proposed	10%	Total Population	Reasons
P.S 35 Naushahro Feroze -III	(a) Padidan STC (b) Padidan Town Committee (c) Darya Khan Marri STC (d) Darya Khan Marri Town Committee (e) STC Kahkat (f) STC Moro (g) Municipal Committee Moro (h) Tappedari Circle Lundki of STC Dooro	90810 25355 53668 11927 51832 83555 95398 11468	Yes	424,013	The proposed constituency of P.S 35 shall be in accordance with the provision of section 20 of the Act, 2017

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No. and Name of Constituency	Extent of Constituency Proposed	Population Proposed	10%	Total Population	Reasons
P.S 36 Naushahro Feroze -IV	(a) STC Sihra (b) STC Dooro excluding T.C Lundki. (c) STC Naushahro Feroze (d) Town Committee Naushahro Feroze (e) TC Mad Alim of STC Bhria (f) TC Tharushah of STC Bhria (g) T.C Dalipota of STC Bhria (h) Tappedari Circle Molhan of STC Bhria (i) T.C Gher Gaju of STC Bhria Road. (j) Town Committee Mithiani	99275 27261 122,494 38181 27659 10769 14448 11541 17337 30386	Yes	399,351	The proposed constituency of P.S 36 shall be in accordance with the provision of section 20 of the Act, 2017

6. That Administrative unites have also been broken in terms of Union Councils of local Government.

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7. That the delimitation authorities have not followed the mandatory provisions of law and the conditions laid down in section 20 of the Election Act, 2017, which provides as under:

Section 20 of the Election Act 2017, provides that (1) All constituency for general seats shall, as far as practicable, be delimited having regard to the distribution of the population in geographically compact areas physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.

(2) For the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal Areas two or more separate areas may be grouped into one constituency.

(3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.

(4) If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, the Commission shall record reasons thereof in the delimitation order.

Even on the basis of the above proposed amendments only minor changes are proposed which would not only save irrational distribution of population but so also shall make the constituencies compact without changing their geographical status.

That this will meet with the ends of justice if your honour may be pleased to consider the representation / objections and allows the proposals made by the applicant.

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APPLICANT NO. 1

Handwritten signature of Applicant No. 2
APPLICANT NO. 2

Handwritten signature of Applicant No. 3
APPLICANT NO. 3

Handwritten signature of Applicant No. 4
APPLICANT NO. 4

