THE FEDERATION OF PAKISTAN
CHAMBERS OF COMMERCE & INDUSTRY
وفـاق ایـوان هـائے تجـارت وصنعت - پاکسـتان

FPCCI.EL2027-28/2026/ 5246
November 24, 2026

THROUGH EMAIL, WEBSITE, WHATSAPP

DECISION NO. 008 (034)
PASSED BY THE SECRETARY GENERAL FPCCI

MR. MUSLIM MOHAMEDI
NOMINEE ON EC&GB CORPORATE, FROM PAKISTAN FISHERIES EXPORTERS ASSOCIATION,
PARTNER
M/S. M.A. MOHAMEDI AND CO.
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SYED MINHAJ UD DIN SHAH
NOMINEE ON EC&GB CORPORATE, FROM **ALL PAKISTAN COMMERCIAL EXPORTERS ASSOCIATION OF ROUGH & UN-POLISHED PRECIOUS & SEMI PRECIOUS STONES**
PROPRIETOR
M/S PAK BUSINESS INTERNATIONAL
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HANAN KHAN
NOMINEE ON GB CORPORATE, FROM **ALL PAKISTAN COMMERCIAL EXPORTERS ASSOCIATION OF ROUGH & UN-POLISHED PRECIOUS & SEMI PRECIOUS STONES**
PROPRIETOR
M/S GEMS CITY
ROOM NO. 6, AL-MAMOOR GEMS
CHAMBER, ZAMAN BLOCK, NAMAK
MANDI PESHAWAR
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SUBJECT: **REPLY TO THE OBJECTION UNDER RULE 18(4) OF THE TRADE ORGANIZATIONS RULES 2013 AGAINST THE INCLUSION OF NOMINATIONS SUBMITTED BY ALL PAKISTAN COMMERCIAL EXPORTERS ASSOCIATION OF ROUGH AND UNPOLISHED PRECIOUS AND SEMI-PRECIOUS STONES OF AT SERIAL NOS. 10, Mr. SYED MINHAJUDDIN SHAH (EC/GB CORPORATE) AND 11, MR. HANAN KHAN (GB CORPORATE) IN THE ADDITIONAL LIST OF NOMINATIONS DATED 23-11-2026, FPCCI ELECTION 2027-28.**

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This is with reference to objections received on 24th November 2026 in FPCCI Head Office Karachi, from Mr. Muslim Mohomedi, nominee on EC&GB (Corporate) from Pakistan Fisheries Exporters Association, on the nominations of Syed Minhaj Ud Din Shah (EC&GB Corporate) and Mr. Hanan Khan (GB Corporate) from All Pakistan Commercial Exporters Association of Rough & Un-Polished Precious & Semi Precious Stones for FPCCI Elections 2027-2028.

Objections raised by the Appellant:

Objections raised regarding the classification of nominations non-renewal of the License of the Association, business activities of the nominees does not relate to the association and nominees' ineligibility and less than 50 million turnover.

FPCCI's Findings:

a) Both the nominations of the Association, were Included under the directives of DGTO, vide Order F.No. 17(31)/2026 dated 16th November 2026.
b) FBR Tax Certificate pertains to the year / period 2019.
c) Tax returns for the year 2024-25 and 2025-26 not provided.
d) Various essential and necessary documents are missing.
e) Business activities does not relate to Rough and Unpolished Precious and Semi-Precious Stones as per NTN Certificate.

Decision by the Secretary General:

In view of the above findings and non-availability of various documents, the objections raised qualify to be considered and nominations are rejected, on the following reasons:

1) Syed Minhaj ud Din Shah, as per FBR Business activities does not relate to the Association,
2) Mr. Hanan Khan, tax return filing provided for the period 2019-20.

As per FPCCI record, the renewal of License is in process in the Office of Directorate General Trade Organization.

Brig Iftikhar Opel, SI(M), Retd
Secretary General

Copy to:

1. The Regulator of Trade Organizations (DGTO), Islamabad
2. The Election Commission, FPCCI

M.A. MOHAMEDI AND CO.

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Ph: +92 21 32316312 Email: mamco2017@gmail.com

Date: 24-11-2026,

The Secretary General,
Federation of Pakistan Chamber of Commerce and Industry,
Federation House, Main Clifton Block 5,
Main Abdullah Shah Ghazi Road,

Through; By Hand

FPCCI DATE 24/11/26 R. NO: 008 KARACHI

Subject:- Objection under Rule 18(4) of the Trade Organizations Rules, 2013 upon the provisional voter list issued on 24-11-2026 regarding inclusion of the representative of the All Pakistan Commercial Exporters Association of Rough & Un-Polished Precious & Semi Precious Stones Peshawar, as Ccorporate Member (GB) Hanan Khan , Proprietor M/s Gems City & Syed Minhaj Din Proprietor Ms Park Business International nominated by All Pakistan Ccommercial Eexporters Association of Rough and Unpolished and Semi precious stones Peshawar, in the provisional voter list issued on 23-11-2026, pursuant to DGTO letter dated 13-11-2026.

Dear Sir,

The undersigned hereby raises the following objections against the inclusion of the above-named nominees of the All Pakistan Commercial Exporters Association of Rough and Unpolished Precious and Semi-Precious Stones, Peshawar (hereinafter referred to as the "Association"), in the provisional voter list for the FPCCI Elections 2027–2028, on the grounds that neither of the nominees fulfils the prescribed eligibility criteria for the respective membership class, nor does the Association appear to possess a valid and subsisting licence, having failed to comply with the statutory requirements concerning renewal of its licence under the Trade Organizations Act, 2013 and the Trade Organizations Rules, 2013.

1. Statutory requirements for eligibility to participate in FPCCI elections

That Article 15 of the Memorandum and Articles of Association of the Federation of Pakistan Chambers of Commerce & Industry (FPCCI) provides that the members of the Electoral College shall be eligible to vote only if they fulfil the conditions prescribed under Section 10 of the Trade Organizations Act, 2013 (hereinafter referred to as the "2013 Act") and the Trade Organizations Rules, 2013 (hereinafter referred to as the "2013 Rules").

That Rule 15(1) of the 2013 Rules, subject to the provisions of Section 10 of the 2013 Act, prescribes the following conditions for eligibility of a member of a trade organization to vote in its elections:

"(a) the member has completed two years of valid membership of the trade organization as on the date of announcement of election schedule by the executive committee of the trade organization;

Provided that old members shall be eligible to vote on completion of one year of their enrollment and payment of all dues; and

For M. A. Mohamedi & Co.
Muslim S. Mohamedi

(b) the member has fulfilled the conditions of membership and renewal thereof of the respective trade organization under rule 11."

That the above provisions are mandatory in nature and require that a person seeking representation in the FPCCI Electoral College must first establish valid membership of a duly licensed trade organization and fulfil the applicable conditions of membership, renewal and eligibility under the 2013 Act and the 2013 Rules.

Consequently, neither an unlicensed or non-compliant trade organization nor a person who does not fulfil the prescribed membership criteria can lawfully claim representation in the electoral process of the FPCCI.

2. Non-renewal of the licence of the Association in violation of the statutory framework

That the All Pakistan Commercial Exporters Association of Rough and Unpolished Precious and Semi-Precious Stones, Peshawar, was granted its licence for a specific trade, namely, the commercial export of rough and unpolished precious and semi-precious stones. The Association is, therefore, required to maintain its legal status and comply with the mandatory statutory and regulatory requirements governing the licensing, renewal and functioning of trade organizations under the 2013 Act and the 2013 Rules.

However, the licence of the Association has not been renewed in accordance with the requirements of Rule 11 of the 2013 Rules and the applicable provisions of the 2013 Act. The failure to obtain the requisite renewal raises a serious question regarding the Association's subsisting legal entitlement to function and exercise the privileges of a licensed trade organization.

That the Association cannot claim the privilege of nominating representatives to the FPCCI Electoral College while remaining in violation of the statutory requirements relating to renewal of its licence. The eligibility of the Association to participate in the FPCCI elections must necessarily be determined with reference to its valid licensing status and compliance with the applicable statutory provisions.

Accordingly, the FPCCI is required to verify from the office of the Director General Trade Organizations whether the Association's licence was validly renewed and remained in force for the relevant period. In the absence of a valid and subsisting licence, the Association cannot lawfully forward nominations for participation in the FPCCI elections.

3. Nominees must carry on business falling within the specific trade for which the Association was licensed

That, without prejudice to the above objection regarding the licensing and renewal status of the Association, it is submitted that the eligibility of both nominees is independently defective because neither nominee has established that he carries on an actual business relating to the specific trade for which the Association was granted its licence.

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Muslim S. Mohamedi

The Association was specifically licensed to represent the trade of commercial exporters dealing in rough and unpolished precious and semi-precious stones. Consequently, its membership cannot be extended indiscriminately to persons carrying on unrelated businesses or commercial activities having no nexus with the specific trade for which the Association was established and licensed.

The very object of licensing a trade organization for a particular trade is to ensure that its membership represents persons genuinely engaged in that trade. A person carrying on an unrelated business cannot acquire eligibility merely by obtaining membership of such an Association or securing nomination through it.

The business activities of both nominees must, therefore, be examined in the context of the specific licensed trade of the Association, rather than merely on the basis of their descriptions as proprietors of business concerns.

4. Mr. Hanansan Khan, Proprietor M/s Gems City, does not fulfil the eligibility criteria for Corporate Membership (GB)

That the Association has nominated Mr. Hanan Khan, Proprietor of M/s Gems City, as its representative from the Corporate Class for the General Body of the FPCCI.

However, the said nominee does not fulfil the prescribed eligibility criteria for Corporate Membership. In particular, the business concern represented by him does not meet the mandatory annual turnover threshold of Rs.50 million prescribed for the relevant category of Corporate Membership.

It is submitted that the Corporate Class eligibility cannot be established merely by describing a business concern as a commercial enterprise or by claiming that the nominee is its proprietor. The prescribed turnover requirement must be established through the relevant income tax returns, audited financial statements, sales tax records and other verifiable financial documents.

Furthermore, no satisfactory evidence has been furnished to establish that M/s Gems City is actually engaged in the commercial export business of rough and unpolished precious and semi-precious stones, which constitutes the specific licensed trade of the Association.

Thus, the nominee suffers from two independent disqualifications: firstly, failure to meet the prescribed Rs.50 million annual turnover threshold for Corporate Membership; and secondly, failure to establish that his business activities fall within the specific trade for which the Association was licensed.

Consequently, the nomination of Mr. Hanansan Khan as Corporate Member (GB) is contrary to the applicable statutory and regulatory requirements and is liable to be rejected.

5. Mr. Syed Minhaj Din, Proprietor M/s Park Business International, does not fulfil the eligibility criteria for Associate Membership

For M. A. MOHAMEDI & CO.

Nusrin S. Mohamedi

That the Association has also nominated Mr. Syed Minhaj Din, Proprietor of M/s Park Business International, as its representative from the Associate Class.

However, the said nominee does not fulfil the prescribed eligibility requirements for Associate Membership, as he has failed to establish that M/s Park Business International is actually engaged in the commercial export business of rough and unpolished precious and semi-precious stones or any other activity falling within the specific trade for which the Association was licensed.

More importantly, the Income Tax Return filed by the said nominee reflects **zero turnover**, which itself constitutes material evidence that no business turnover has been declared by him during the relevant tax period.

The filing of an income tax return, by itself, does not establish eligibility for membership of a trade organization. What is material is whether the individual is genuinely engaged in the trade represented by the Association and whether the business concern satisfies the applicable membership requirements.

A person having no declared business turnover and no demonstrated commercial activity relating to the specific licensed trade cannot be treated as a genuine Associate Member merely on the basis of a proprietorship designation or an NTN registration.

Accordingly, Mr. Syed Minhaj Din has failed to establish the fundamental requirement of carrying on a business falling within the specific trade of the Association. His nomination as Associate Member is, therefore, legally unsustainable and liable to be rejected.

6. Ineligibility of nominees whose underlying membership does not fulfil the statutory requirements

That the Honourable Islamabad High Court, in its judgment reported as **2021 CLD 204, titled Aftab Ahmed Barlas v. Director General Trade Organizations and Others (W.P. No. 4172/2019)**, has recognized the principle that where an individual does not fulfil the legal requirements for membership of a trade organization, such individual cannot claim eligibility to represent that trade organization in the electoral process of the FPCCI.

The principle laid down by the Honourable Islamabad High Court squarely applies to the present matter. The eligibility of the nominees cannot be determined merely on the basis of nomination letters forwarded by the Association or their inclusion in the provisional voter list. Their underlying membership must independently satisfy the statutory requirements, including the requirement that their business activities fall within the specific trade represented by the Association.

Where the underlying membership itself is defective, the consequential nomination to the FPCCI Electoral College cannot be sustained.

7. Consequences under Article 15 of the FPCCI Memorandum and Articles of Association read with Rules 11 and 15 of the 2013 Rules

For M. A. MOHAMEDI & CO.

Muslim S. Mohamedi

That Article 15 of the Memorandum and Articles of Association of the FPCCI, read with Rule 15(1) and Rule 11 of the 2013 Rules, makes it incumbent upon the FPCCI to ensure that only duly qualified members of legally compliant and duly licensed trade organizations are included in its Electoral College.

The Association, having failed to establish renewal of its licence in accordance with the statutory requirements, cannot claim an automatic right to forward nominees for participation in the FPCCI elections. Independently, both nominees have failed to establish that their respective business concerns are engaged in the specific trade for which the Association was licensed.

Furthermore, the Corporate nominee has failed to satisfy the prescribed annual turnover threshold of Rs.50 million, whereas the Associate nominee's income tax return reflects zero turnover and does not establish any actual business activity relating to the licensed trade.

Therefore, the Association's nominations are not merely deficient on account of procedural irregularities; rather, they suffer from fundamental defects concerning the legal status of the nominating Association and the substantive eligibility of the nominees themselves.

PRAYER

In view of the foregoing, it is respectfully requested that:

a. The present objection may kindly be entertained under Rule 18(4) of the Trade Organizations Rules, 2013, against the inclusion of the representatives nominated by the All Pakistan Commercial Exporters Association of Rough and Unpolished Precious and Semi-Precious Stones, Peshawar, in the provisional voter list issued on 23-11-2026.

b. The licensing and renewal status of the Association may kindly be verified from the office of the Director General Trade Organizations, particularly whether its licence has been validly renewed and remains subsisting in accordance with the 2013 Act and the 2013 Rules.

c. The nomination of **Mr. Hanansan Khan, Proprietor M/s Gems City, as Corporate Member (GB)** may kindly be rejected and his name deleted from the provisional voter list on account of his failure to meet the prescribed annual turnover threshold of Rs.50 million and his failure to establish that his business falls within the specific licensed trade of the Association.

d. The nomination of **Mr. Syed Minhaj Din, Proprietor M/s Park Business International, as Associate Member** may likewise be rejected and his name deleted from the provisional voter list, as his income tax return reflects zero turnover and he has failed to establish any actual business activity relating to the specific trade for which the Association was licensed.

e. The Association may be directed to produce its valid licence and renewal order, membership registers, admission forms, relevant income tax returns, audited financial statements, sales tax records and documentary evidence establishing that both nominees are genuinely engaged in the specific licensed trade.

For M. A. MOHAMEDI & CO.

Muslim S. Mohamedi

f. Unless and until the legal status of the Association and the individual eligibility of both nominees are established in accordance with law, they may not be permitted to participate in the FPCCI Elections 2027–2028.

The objection is submitted in the interest of transparency, legality and fairness in the electoral process of the FPCCI.

Regards,

For M. A. MOHAMEDI & CO.

Muslim S. Mohamedi

Muslim Mohamedi,
EC & GB Member of FPCCI 2027-28