

THE JURISDICTION OF THE HIGH COURT UNDER ARTICLE 199 OF THE CONSTITUTION OF PAKISTAN: A CASE STUDY OF THE OIL AND GAS REGULATORY FRAMEWORK

RIZWAN AHMAD

AFFILIATION INDEPENDENT RESEARCHER

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ABSTRACT:

This research paper critically examines the role of judicial review in preventing executive overreach in Pakistan, with a particular focus on the constitutional jurisdiction exercised by courts under Article 199. It highlights the judiciary's role in reinforcing regulatory compliance, ensuring procedural fairness, and protecting economic rights against arbitrary administrative actions. By analyzing key judicial precedents, including recent rulings by the Courts, this paper illustrates how courts have maintained the supremacy of law in regulatory matters, particularly within the petroleum sector governed by the Oil and Gas Regulatory Authority Ordinance, 2002. Additionally, the paper explores how judicial intervention serves as a safeguard against the misuse of administrative authority, compelling regulatory bodies such as OGRA to function within their legally defined scope. A comparative analysis of judicial review frameworks in the UK and USA provides further insight into how courts in different jurisdictions balance executive discretion with constitutional oversight. The research concludes that judicial vigilance remains crucial for upholding constitutionalism, regulatory transparency, and economic freedoms in Pakistan, reinforcing the principle that no administrative authority is above the law. This research paper critically examines the role of constitutional jurisdiction in preventing executive overreach in Pakistan, focusing on the regulatory framework governing petroleum businesses. It explores the significance of judicial review in administrative actions, emphasizing the limitations imposed by the Oil and Gas Regulatory Authority Ordinance, 2002, and the Pakistan Oil (Refining, Blending, Transportation, Storage, and Marketing) Rules, 2016. The paper delves into the broader implications of constitutional jurisdiction on regulatory governance, the protection of economic rights, and the role of the judiciary in ensuring fair and lawful administrative practices. By analyzing judicial precedents, statutory frameworks, and governance principles, this paper highlights the importance of lawful authority in executive decision-making and its impact on the business environment in Pakistan.

Key Words: Judicial review, Executive Overreach, Constitutional jurisdiction, Regulatory compliance.

INTRODUCTION

The judiciary plays a crucial role in upholding the rule of law by ensuring that administrative authorities operate within their legal mandate. In Pakistan, constitutional jurisdiction under Article 199 of the Constitution serves as a safeguard against arbitrary executive actions. The ability of the judiciary to intervene in matters where executive actions exceed their lawful authority is central to maintaining a balanced legal system. By interpreting constitutional provisions and ensuring adherence to statutory regulations, the courts act as a check on governmental overreach, preventing unlawful actions that could infringe upon citizens' fundamental rights.

Judicial intervention is especially significant in regulatory frameworks, where overlapping laws and delegated authority often create ambiguity. The regulation of industries such as petroleum and energy require clear guidelines to prevent

administrative bodies from exercising powers beyond their statutory mandate. Over the years, legal precedents have shaped the understanding of how administrative discretion should be exercised within constitutional limits. Courts have consistently ruled that regulatory authorities must operate within the confines of the law, ensuring that decisions affecting businesses and individuals are justified and proportional.

This research paper examines how courts have interpreted constitutional limits on administrative authority, particularly in the regulation of the petroleum sector, and the implications for governance and economic rights. It discusses the extent to which judicial oversight contributes to transparency in administrative decision-making and ensures that executive actions remain legally sound. Furthermore, the paper explores the relationship between the constitutional right to conduct business and the limitations imposed by regulatory bodies, highlighting instances where the judiciary has intervened to protect economic freedoms against arbitrary restrictions.

By analyzing key judicial precedents and statutory frameworks, this paper aims to contribute to the academic discourse on the judiciary's role in maintaining a balance between administrative discretion and legal accountability. The paper also provides insights into how Pakistan's courts have defined the scope of executive powers and the remedies available to aggrieved parties when government functionaries act beyond their legal mandate. In doing so, this research underscores the importance of judicial review in promoting a fair and lawful regulatory environment.

LITERATURE REVIEW

Legal scholarship on constitutional jurisdiction in Pakistan underscores the judiciary's responsibility in reviewing executive actions (Cheema & Gilani, 2021). Academic discussions on administrative law, separation of powers, and regulatory compliance provide insights into the evolving legal landscape. The concept of regulatory oversight, particularly in energy and petroleum governance, has been a focal point of many legal discussions (Ahmed, 2020). Legal Scholars have debated the extent to which judicial intervention can ensure the protection of fundamental rights while maintaining a balance with administrative discretion.

Several studies have explored the role of the judiciary in ensuring the legitimacy of executive decisions. Some legal scholars argue that while judicial oversight is essential for maintaining constitutional order, excessive intervention by courts can disrupt governance (Khan, 2019). The principle of separation of powers suggests that executive, legislative, and judicial functions should remain distinct, yet courts have occasionally been required to step in when administrative authorities exceed their jurisdiction. Judicial rulings in Pakistan have played a vital role in shaping how administrative agencies exercise their regulatory functions. This includes not only decisions concerning petroleum regulation but also broader economic and industrial regulatory matters (Malik, 2022).

In the context of regulatory governance, comparative legal studies provide valuable insights into how different jurisdictions balance administrative autonomy and judicial oversight (Smith, 2018). In countries with strong regulatory frameworks, such as the United Kingdom and the United States, judicial review mechanisms ensure that regulatory bodies act within their legal mandate. The case of *Council of Civil Service Unions v. Minister for the Civil Service* [1985] AC 374 in the UK established key principles of judicial review, emphasizing illegality, procedural impropriety, and irrationality as grounds for challenging administrative decisions. Similarly, in the United States, *Chevron U.S.A., Inc. v. Natural Resources Defense Council, Inc.*, 467 U.S. 837 (1984), set forth the Chevron deference, guiding courts on the extent to which they should defer to administrative agency interpretations of statutes.

However, courts in these jurisdictions typically adopt a more restrained approach, intervening only when there is a clear violation of legal principles. By contrast, in developing legal systems such as Pakistan's, the judiciary often plays a more proactive role in ensuring compliance with constitutional and statutory provisions (Rahman, 2021).

Another important aspect of the literature on administrative law relates to the efficiency of judicial remedies. Some scholars argue that legal proceedings can be time-consuming and burdensome for businesses seeking relief from regulatory overreach (Zafar, 2020). Alternative dispute resolution mechanisms, such as administrative tribunals, have been proposed as a means

of providing a more efficient remedy while reducing the caseload of higher courts. However, in cases where fundamental rights are at stake, judicial intervention remains an essential safeguard against executive misuse of power (Jamil, 2017).

This section also highlights historical developments in judicial review and its application in Pakistan. Early case law established the principle that executive actions must conform to the law, while more recent judgments have reinforced the necessity of maintaining procedural fairness in regulatory decisions (Nasir, 2022). As judicial review continues to evolve, scholars continue to debate the extent to which courts should intervene in regulatory matters, balancing the need for legal oversight with the importance of allowing administrative agencies to function independently.

Furthermore, scholars have analyzed how judicial review impacts economic development (Hussain, 2019). Some legal researchers argue that excessive judicial intervention can create regulatory uncertainty, deterring foreign investment and slowing economic progress. Others counter this view by asserting that a strong judiciary is necessary to ensure that government agencies operate fairly and transparently. In the case of Pakistan, judicial activism has played a pivotal role in setting standards for regulatory compliance, which in turn fosters trust in the legal and business environment (Saeed, 2020). Case law from other jurisdictions, including India and South Africa, has been examined to draw parallels on how courts manage conflicts between administrative power and judicial oversight.

Overall, the literature review underscores the judiciary's role in ensuring lawful regulatory practices while also examining the potential challenges associated with judicial intervention. The body of legal research suggests that while constitutional jurisdiction is a crucial mechanism for protecting individual and business rights, it must be exercised with caution to avoid unnecessary disruptions to administrative governance. More research is needed to determine the long-term effects of judicial intervention in regulatory matters and its impact on economic growth and governance efficiency.

METHODOLOGY

This study adopts a doctrinal legal research methodology, focusing on the analysis of constitutional provisions, judicial precedents, and statutory frameworks to assess the role of judicial oversight in regulating administrative discretion within Pakistan's petroleum sector. This methodology is chosen due to its effectiveness in analyzing legal principles, statutory interpretations, and judicial reasoning, which are central to understanding the judiciary's role in administrative regulation (Hutchinson & Duncan, 2012). The doctrinal approach allows for a structured and systematic examination of legal texts and judicial decisions, facilitating an in-depth understanding of constitutional and regulatory frameworks (McCrudden, 2006).

A qualitative research approach is employed, relying on primary and secondary legal sources, including constitutional texts, legislative enactments, case law, and scholarly commentary. The study critically examines Article 199 of the Constitution of Pakistan, which grants the judiciary authority to review executive actions, ensuring they comply with legal and constitutional mandates. The research further explores the judicial application of regulatory statutes such as the Oil and Gas Regulatory Authority Ordinance, 2002, and the Pakistan Oil (Refining, Blending, Transportation, Storage, and Marketing) Rules, 2016, assessing how courts have interpreted these laws to maintain a balance between regulatory control and economic freedoms.

A case law analysis is integral to this study, providing insight into judicial reasoning in cases where administrative authorities have allegedly exceeded their jurisdiction. Landmark judicial decisions, including *Export Promotion Bureau v. Qaiser Shafiullah* (1994 SCMR 859) and *Dilawar Jan v. Gul Rehman* (PLD 2001 SC 149), are examined to illustrate the scope and limitations of constitutional jurisdiction. Additionally, the research incorporates comparative legal analysis by reviewing judicial approaches in jurisdictions such as the United Kingdom and the United States. Notable cases like *Council of Civil Service Unions v. Minister for the Civil Service* [1985] AC 374 and *Chevron U.S.A., Inc. v. Natural Resources Defense Council, Inc.*, 467 U.S. 837 (1984), provide comparative insights into how judicial oversight operates in established regulatory frameworks. Comparative analysis further enhances the doctrinal method by offering alternative judicial perspectives on administrative discretion (Siems, 2018).

Secondary sources such as legal journals, academic books, and reports from regulatory bodies are also analyzed to contextualize judicial trends and their implications for regulatory governance. Works by scholars such as Cheema and Gilani (2021), Ahmed (2020), and Malik (2022) offer theoretical perspectives on judicial review and administrative law, contributing to an understanding of the balance between regulatory autonomy and legal accountability. The study also engages with critiques of judicial activism, incorporating perspectives from legal scholars such as Khan (2019) and Hussain (2019), who debate the economic and governance implications of judicial intervention in regulatory matters. The reliance on doctrinal analysis is further justified by its capacity to explore judicial trends and their legal ramifications through systematic legal reasoning (Bell, 2011).

By synthesizing doctrinal legal analysis with comparative and case law methodologies, this research aims to provide a comprehensive examination of judicial intervention in administrative regulation. The findings contribute to academic discourse on constitutional jurisdiction, regulatory governance, and the evolving role of the judiciary

LEGAL FRAMEWORK ANALYSIS

Constitutional Jurisdiction under Article 199 Article 199 of the Constitution of Pakistan empowers high courts to issue writs against unlawful executive actions. Courts have consistently held that administrative decisions must comply with statutory authority, as reinforced in *Export Promotion Bureau v. Qaiser Shafiqullah* (1994 SCMR 859):

“Constitutional jurisdiction is not designed and intended to be used as a substitute for a regular appeal or to be equated with a regular appeal. In a Constitutional petition, the High Court cannot interfere with a finding of fact merely on the ground that the reasons which found favor with the Authority whose order is under scrutiny were not such which would have been accepted by the High Court. The Constitutional jurisdiction can be invoked to rectify jurisdictional defects.”

Similarly, in *Dilawar Jan v. Gul Rehman* (PLD 2001 SC 149), the Supreme Court observed:

“We are conscious of the fact that the learned High Court in exercise of Constitutional jurisdiction cannot sit as a Court of appeal but where order passed by Court, suffers from any jurisdictional defect or violates any provision of law, invocation of Constitutional jurisdiction would be justified.”

Regulatory Authority of OGRA The Oil and Gas Regulatory Authority Ordinance, 2002, established OGRA as the primary regulatory body for petroleum businesses in Pakistan. The Pakistan Oil (Refining, Blending, Transportation, Storage, and Marketing) Rules, 2016, provide a comprehensive regulatory framework, superseding the outdated Pakistan Petroleum (Refining, Blending and Marketing) Rules, 1971. Courts have emphasized that executive actions must align with these updated legal provisions.

Discussion: Judicial Precedents and Executive Authority

Limits of Administrative Authority Judicial review ensures that administrative officials act within the scope of their legally delegated powers. In *Muhammad Safeer v. Muhammad Azam* (PLD 2024 SC 838), the Supreme Court reaffirmed:

“When the law provides an adequate remedy, constitutional jurisdiction under Article 199 will ordinarily only be exercised in exceptional circumstances. The exceptional circumstances which may justify exercising jurisdiction when an adequate remedy is available are when the order or action assailed before the High Court is palpably without jurisdiction, manifestly mala fide, void or coram non iudice.”

Right to Conduct Business Article 18 of the Constitution guarantees the right to engage in lawful trade and business. The Article states:

“Freedom of trade, business or profession: Subject to such qualifications, if any, as may be prescribed by law, every citizen shall have the right to enter upon any lawful profession or occupation, and to conduct any lawful trade or business: Provided that nothing in this Article shall prevent—

- (a) the regulation of any trade or profession by a licensing system; or
- (b) the regulation of trade, commerce or industry in the interest of free competition therein; or
- (c) the carrying on, by the Federal Government or a Provincial Government, or by a corporation controlled by any such Government, of any trade, business, industry or service, to the exclusion, complete or partial, of other persons.”

Courts have consistently ruled that regulatory restrictions must be legally justified, as affirmed in Government of Punjab v. Crescent Textile Mills Limited (PLD 2004 SC 108).

JUDICIAL REVIEW AS A CHECK ON EXECUTIVE ACTIONS

Judicial review serves as a fundamental mechanism to prevent executive overreach and ensure compliance with statutory frameworks. The courts have consistently held that administrative authorities must operate within the legal parameters set by the Constitution and relevant regulatory laws. Judicial intervention becomes necessary when an authority exceeds its jurisdiction, acts in bad faith, or violates fundamental rights. The Lahore High Court, in its recent judgment, reinforced these principles, emphasizing the court’s role in ensuring that executive actions remain within legally defined limits.

In Nasreen Fatima v. Principal, Bolan Medical College (PLD 1978 Quetta 17) and Saeeda Fatima v. Abdul Hamid (PLD 1983 SC 258), courts reinforced:

“It is by now settled law that the High Courts in exercise of their Constitutional jurisdiction do not normally interfere with the finding on fact but if the decisions are based in disregard of the provisions of law, or, are based on misreading or insufficient or inadmissible evidence the superior Courts have interfered with such decisions and findings in order to advance the cause of justice.”

Further, in a case analyzed in the Lahore High Court’s recent decision, the court invalidated administrative actions that were carried out without proper authority, emphasizing that an action taken without delegated power is void ab initio. The judgment also cited Muhammad Safeer v. Muhammad Azam (PLD 2024 SC 838), reaffirming:

“When the law provides an adequate remedy, constitutional jurisdiction under Article 199 will ordinarily only be exercised in exceptional circumstances. The exceptional circumstances which may justify exercising jurisdiction when an adequate remedy is available are when the order or action assailed before the High Court is palpably without jurisdiction, manifestly mala fide, void or coram non judice.”

Moreover, judicial review plays a crucial role in upholding procedural fairness. The Lahore High Court reiterated that any administrative action must be conducted in accordance with the principles of natural justice, ensuring that affected parties have the opportunity to present their case. The judgment underscored those violations of due process, such as the absence of a hearing or failure to provide reasons for a decision, render an executive order unlawful.

Additionally, the court emphasized that judicial intervention is necessary when executive bodies fail to recognize their jurisdictional limits. In cases where an administrative authority enforces outdated laws or acts in contradiction to superior legislation, judicial review ensures the supremacy of updated regulatory frameworks. The recent case highlighted how executive overreach can occur when officials rely on obsolete legal provisions rather than adhering to the prevailing statutory framework, as was evident in the misapplication of outdated petroleum regulatory laws.

Thus, judicial review remains a crucial safeguard against arbitrary governance. It ensures that administrative decisions are legally sound, procedurally fair, and consistent with constitutional principles. Courts continue to play a key role in maintaining the integrity of the legal system by invalidating actions that violate fundamental rights, exceed lawful authority, or disregard statutory mandates. Judicial review serves as a mechanism to prevent executive overreach and ensure

compliance with statutory frameworks. In Nasreen Fatima v. Principal, Bolan Medical College (PLD 1978 Quetta 17) and Saeeda Fatima v. Abdul Hamid (PLD 1983 SC 258), courts reinforced:

“It is by now settled law that the High Courts in exercise of their Constitutional jurisdiction do not normally interfere with the finding on fact but if the decisions are based in disregard of the provisions of law, or, are based on misreading or insufficient or inadmissible evidence the superior Courts have interfered with such decisions and findings in order to advance the cause of justice.”

IMPLICATIONS OF JUDICIAL OVERSIGHT REINFORCEMENT OF REGULATORY COMPLIANCE

Judicial intervention ensures that regulatory bodies like OGRA operate within their legal framework, promoting consistency and due process. The Lahore High Court, in its recent judgment, reaffirmed that executive actions taken outside the scope of delegated powers create legal uncertainty and regulatory inconsistencies. By setting aside administrative orders that lacked legal justification, the court emphasized the role of judicial review in ensuring compliance with prevailing laws and procedural safeguards.

In this context, the court stressed that the Oil and Gas Regulatory Authority (OGRA) is the sole entity responsible for regulating the petroleum sector under the 2002 Ordinance, rendering any actions by non-designated officials unlawful. The judgment cited *Muhammad Safeer v. Muhammad Azam (PLD 2024 SC 838)*, which underscored that regulatory compliance must be upheld through proper legal channels and within the statutory limits assigned to administrative bodies. This ensures that businesses and individuals operate within a predictable and stable regulatory environment, thereby fostering economic stability and growth.

Furthermore, judicial oversight enhances transparency by compelling regulatory authorities to adhere to procedural mandates. The court’s intervention in cases of executive overreach has established a precedent that regulatory bodies cannot arbitrarily impose penalties or sanctions without following due process. Such decisions strengthen the public’s confidence in the legal system and reinforce regulatory compliance across various industries. Judicial intervention ensures that regulatory bodies like OGRA operate within their legal framework, promoting consistency and due process.

PREVENTION OF EXECUTIVE OVERREACH

By limiting unauthorized administrative actions, judicial review upholds the principle that public officials must act strictly within their statutory authority, preventing arbitrary decisions. The Lahore High Court’s decision emphasized that the executive branch cannot exceed its powers by enforcing outdated or inapplicable legal provisions. The judgment ruled that any action taken without express legal backing is void and unenforceable.

The case referenced *Nasreen Fatima v. Principal, Bolan Medical College (PLD 1978 Quetta 17)* and *Saeeda Fatima v. Abdul Hamid (PLD 1983 SC 258)*, reinforcing the principle that executive orders must be based on legal merit rather than administrative discretion. The court determined that administrative authorities cannot invoke outdated laws or circumvent proper legal procedures to justify actions that lack jurisdictional validity.

Moreover, the judgment established that executive overreach often leads to unfair treatment of businesses and individuals, disrupting lawful operations. The Lahore High Court ruled that any deviation from prescribed regulatory frameworks must be rectified through judicial intervention, ensuring that administrative authorities remain accountable for their actions. This precedent safeguards individuals and businesses from unlawful interference, thereby reinforcing constitutional governance and administrative accountability. By limiting unauthorized administrative actions, judicial review upholds the principle that public officials must act strictly within their statutory authority, preventing arbitrary decisions.

PROTECTION OF ECONOMIC RIGHTS

The judiciary plays a pivotal role in safeguarding business rights by ensuring regulatory fairness and preventing unlawful administrative interference. It is pertinent to mention here that the Courts time and again reinforced that economic rights enshrined under Article 18 of the Constitution must be protected against arbitrary administrative decisions. The court ruled that businesses cannot be penalized or shut down without due process, as such actions violate constitutional guarantees of economic freedom.

In *Government of Punjab v. Crescent Textile Mills Limited* (PLD 2004 SC 108), it was emphasized that any restriction on lawful trade must have a strong legal foundation. The judgment highlighted that actions taken without proper notice, hearing, or justification undermine economic stability and investor confidence, deterring both local and foreign investments.

Additionally, the court stressed that safeguarding economic rights is integral to fostering a competitive and transparent business environment. Regulatory bodies must ensure that any enforcement action is carried out within legal boundaries to prevent unnecessary disruption to commerce and industry. The Court's ruling reinforces the principle that judicial intervention is necessary when executive actions threaten economic freedoms, ensuring that businesses operate under a legally predictable and fair system. The judiciary plays a pivotal role in safeguarding business rights by ensuring regulatory fairness and preventing unlawful administrative interference.

CONCLUSION.

Judicial review remains a cornerstone of constitutional governance in Pakistan, ensuring that administrative authorities act within their legal mandate and do not exceed their jurisdiction. This research paper has demonstrated how courts, have played a crucial role in maintaining the supremacy of law by preventing executive overreach, reinforcing regulatory compliance, and safeguarding economic rights. By invoking constitutional jurisdiction under Article 199, the judiciary has established that executive actions must be legally justified, procedurally fair, and aligned with statutory frameworks.

The analysis of judicial precedents highlights the necessity of ensuring that regulatory bodies, such as OGRA, function within their legally defined scope. The judiciary's intervention in cases of unlawful administrative actions has reinforced the principle that outdated regulations cannot override contemporary statutory frameworks. This ensures consistency in governance and protects businesses and individuals from arbitrary decisions that could otherwise disrupt economic stability.

Moreover, judicial oversight serves as an essential mechanism for maintaining a fair balance between regulatory enforcement and economic freedom. The court's emphasis on procedural fairness, as demonstrated in recent case law, ensures that businesses are not subjected to punitive measures without due process. This intervention upholds the constitutional right to conduct lawful trade and fosters an environment where regulatory bodies operate transparently and justly.

Furthermore, this paper has highlighted how comparative legal frameworks, particularly from the UK and the USA, provide valuable insights into the evolution of judicial review. While courts in these jurisdictions exercise a more restrained approach, Pakistan's judiciary has adopted a more proactive stance in ensuring administrative accountability. The Lahore High Court's recent decisions exemplify how judicial activism can be leveraged to protect fundamental rights and maintain regulatory order.

In conclusion, judicial review plays a critical role in upholding constitutionalism, preventing misuse of administrative power, and ensuring that regulatory authority's function within their designated mandates. The judiciary's commitment to maintaining legal clarity, procedural fairness, and economic rights strengthens the foundation of democratic governance in Pakistan. Moving forward, continued judicial vigilance will be necessary to address emerging challenges in regulatory law and to ensure that executive actions remain firmly within constitutional boundaries. Judicial review remains a cornerstone of constitutional governance in Pakistan, ensuring that administrative authorities act within their legal mandate. The judiciary's role in reinforcing regulatory frameworks and protecting economic rights strengthens the rule of law and promotes fair governance.

BIBLIOGRAPHY

Books, Articles, and Journals:

1. Ahmed, S. (2020). 'Judicial Oversight and Regulatory Frameworks in Pakistan', Karachi Law Review.
2. Cheema, U. & Gilani, R. (2021). 'The Constitutional Role of Judiciary in Pakistan: Balancing Executive Power', Pakistan Journal of Law and Society.
3. Bell, J. (2011) Comparative administrative law. Edward Elgar Publishing.
4. Hussain, A. (2019). 'Judicial Activism and Economic Development in Pakistan', Lahore Legal Studies.
5. Jamil, F. (2017). 'Alternative Dispute Resolution and the Role of Judiciary', Islamabad Journal of Legal Studies.
6. Khan, T. (2019). 'Separation of Powers and Judicial Intervention in Pakistan', South Asian Legal Review.
7. Malik, N. (2022). 'Administrative Law and Regulatory Governance in Pakistan', Journal of Policy and Governance.
8. McCrudden, C. (2006) 'Legal research and the social sciences', Law Quarterly Review, 122, pp. 632-650.
9. Nasir, M. (2022). 'Judicial Review and the Rule of Law in Pakistan', Punjab Law Review.
10. Rahman, K. (2021). 'Comparative Analysis of Regulatory Governance in South Asia', Asian Law Journal.
11. Saeed, H. (2020). 'Judiciary and Regulatory Compliance in Pakistan', Business and Law Journal.
12. Smith, J. (2018). 'Judicial Review in the United Kingdom and its Lessons for Developing Democracies', International Law Review.
13. Siems, M. (2018) 'Legal originality', Oxford Journal of Legal Studies, 38(1), pp. 239-260.
14. Zafar, R. (2020). 'Legal Remedies for Businesses Facing Regulatory Overreach', Pakistan Business Law Journal.

CASE LAW:

1. Council of Civil Service Unions v. Minister for the Civil Service (1985) AC 374 (HL). Available at: <https://www.bailii.org/uk/cases/UKHL/1984/9.html> (Accessed: 15 February 2025).
2. Chevron U.S.A., Inc. v. Natural Resources Defense Council, Inc., 467 U.S. 837 (1984) (USA).
3. Export Promotion Bureau v. Qaiser Shafiullah (1994) SCMR 859. Available at: <https://www.pakistanlawsonline.com/> (Accessed: 20 February 2025).
4. Dilawar Jan v. Gul Rehman (2001) PLD SC 149. Available at: <https://www.pakistanlawsonline.com/> (Accessed: 12 March 2025).
5. Government of Punjab v. Crescent Textile Mills Limited (2004) PLD SC 108. Available at: <https://www.pakistanlawsonline.com/> (Accessed: 5 March 2025).
6. Muhammad Safeer v. Muhammad Azam (2024) PLD SC 838. Available at: <https://www.pakistanlawsonline.com/> (Accessed: 27 February 2025).
7. Nasreen Fatima v. Principal, Bolan Medical College (1978) PLD Quetta 17. Available at: <https://www.pakistanlawsonline.com/> (Accessed: 10 March 2025).
8. Saeeda Fatima v. Abdul Hamid (1983) PLD SC 258. Available at: <https://www.pakistanlawsonline.com/> (Accessed: 25 February 2025).

LEGISLATION AND LEGAL DOCUMENTS:

1. Government of Pakistan (2012). The Constitution of the Islamic Republic of Pakistan (Eighth Edition). Article 18. Retrieved from: https://www.na.gov.pk/uploads/documents/1549886415_632.pdf (Accessed: 10 February 2025).
2. Government of Pakistan (2002). Oil and Gas Regulatory Authority Ordinance, 2002. Retrieved from: http://www.na.gov.pk/uploads/documents/1345401745_461.pdf (Accessed: 18 March 2025).
3. Government of Pakistan (2016). Pakistan Oil (Refining, Blending, Transportation, Storage, and Marketing) Rules, 2016. Retrieved from: <http://www.pakistanlawsonline.com> (Accessed: 2 March 2025).