ORDER
THE PUNJAB INFORMATION COMMISSION

1. Shahbaz Akmal vs XEN Building Division 1 LHR (Complaint # 24-3-2026-3 to 9)
2. Shahbaz Akmal vs XEN Building Division 5 LHR (Complaint # 24-3-2026-10 to 15)
3. Shahbaz Akmal vs XEN Building Division 6 LHR (Complaint # 24-3-2026-16 to 20)
4. Shahbaz Akmal vs XEN Building Division 7 LHR (Complaint # 24-3-2026-21 to 25)
5. Shahbaz Akmal vs XEN Building Division 1 FSD (Complaint # 24-3-2026-26 to 30)
6. Shahbaz Akmal vs XEN Building Division SKP (Complaint # 24-3-2026-31 to 37)

Subject: **RTI Complaint Regarding Non-Provision of Public Information under the Punjab Transparency and Right to Information Act 2013**

14.04.2026 Complainant is present in person.

2. Complainant filed thirty-five (35) RTI Applications all addressed to Executive Engineer Buildings Department of different Divisions of Lahore, Faisalabad and Sheikhupura and all seeking identical information regarding different projects mentioned in the said applications i.e. chronological log of all laboratory test reports for foundational and structural materials, financial invoices and payment receipts issued directly by the independent testing laboratories, itemized approval letter issued by the Finance Department about rates of all non-standardized (N.S.) items, official work order, financial & physical progress of the project and completion certificate. All RTI Applications are identically worded and only name of the project is changed. As for financial invoices issued by testing laboratories and approval issued by Finance Department, the said record, since does not originate from respondent public body, the said public body cannot provide attested copies of the same as required in Section 10(9) of RTI Act, 2013. Additionally, large number of complaints filed against one department seeking identical record from its different offices calls for

evaluation of appropriateness of such request to curb abuse of RTI Act, 2013 by its repetitive use against one public body by Complainant and for the said purpose, Complainant was summoned vide Notice dated 14.04.2026 to argue maintainability of his requests.

3. Stressing that quantum of RTI Applications does not tarnish maintainability of these complaints since no limit on number of such requests has been imposed either in RTI Act, 2013 or in Article 19-A of Constitution of Islamic Republic of Pakistan, 1973, Complainant stated that all projects identified by him were financed by public funds and hence, his right to seek information regarding the same cannot be curtailed. In the same breath, he also justifies his aforesaid requests by highlighting that Building Department makes part of Communication and Works Department having over one hundred (100) offices in Punjab, out of which only six (06) have been approached through multiple applications all seeking information regarding projects having different location and budget allocation.

4. Jurisprudence recently developed by Hon'ble Superior Courts offers means to appraise the aforesaid. Hon'ble Islamabad High Court in **WP # 3678/2025 (Federal Board of Revenue vs Pakistan Commission on access to information and another)**, while rejecting citizens' requests for massive data held that Information Commission, "*11 .... as a statutory adjudicatory body, is nonetheless required to apply principles of proportionality, reasonableness, and abuse of process inherent in public law. A request which imposes a manifestly disproportionate administrative burden, without a demonstrated nexus to public accountability, may lawfully be declined.*" Similarly Hon'ble Sindh High Court observed in **PLD 2025 Sindh**

1 (Amir Baloch vs Sindh Information Commission and others) that though goal of RTI Laws is to spread information in the public interest, but at the same time transparency in spreading information should be observed, meaning thereby that the system of a functionary should not be hampered. Following the dictum of WP # 3678/2025, this Commission is required to check abuse of process; such check being vital for the purpose of realization of objects of RTI Act, 2013 by preventing it from being a tool in the hands of persons filing RTI Applications out of mere curiosity or generalize allegation without a nexus to governmental accountability and thus not satisfying the threshold of public importance contemplated by both Constitution and the statute.

5. Although it is complex to visualize all types of misuse of RTI Laws, this Commission is however, making an attempt to do so by adapting a purposive construction of the said law in order to prevent the aforesaid apprehended abuse. RTI Act, 2013 is aimed at making state actions more transparent and should not be allowed to be misused so as to become a tool of obstructing regular official functions of public bodies. RTI Act, 2013 is though a beneficial law, however, when use of such law is converted into a tool for mischief, it must be checked. Accountability contemplated in preamble of RTI Act, 2013, though can only be possible upon inspection of information and record, however, such accountability request should not be tainted. Filing of such large number of complaints against different bodies ~~of one department~~ demonstrate motive behind initiation of these proceedings; the motive being anything but seeking information related to matters of public importance. It is further observed that right of access to information must not collide with public interest like efficient operation of government functionaries and optimum use of limited fiscal and human

resources. Large number of identical RTI Applications like in the present case, rather than fortifying the object and mandate of RTI Act, 2013, nullifies its purpose since such misuse will not only intimidate public bodies but will also result in public losing confidence in RTI Laws. While reaching such conclusion, this Commission takes support from orders passed by Supreme Court of India in (2011)8 SCC 497 (CBSE vs Aditya Bandopadhaya), Delhi High Court in W.P. (C) 845/2014 (Shail Sahni vs Sanjeev Kumar), W.P. (C) 406/2016 (Shail Sahni vs Smt Valsa Sara Mathew) and Judgement dated 28.11.2026 passed by Central Information Commission of India in Shweta Saini vs PIO Daya Ibadh Educational Institute holding that repetitive RTI Requests seeking information of large width and amplitude is nothing but abuse of RTI Laws and rather than advancing, such requests collide with public interest and convert RTI Laws into tool of oppression and intimidation with public officials spending most of their time in collecting and disseminating information rather than executing their official duties.

6. After arguing the matter for some length, Complainant stated that in case his requests are not maintainable, number of his complaints could be reduced and this Commission may start proceeding with some of the complaints. Such exercise being alien to applicable law, cannot be entertained neither is this Commission inclined to do the same. Observations regarding conduct of the Complainant and penalty imposed for the said conduct by Hon'ble Lahore High Court in PLD 2025 LHR 649 (Shahbaz Akmal vs Province of Punjab through Director General Excise & Taxation, Lahore etc.) can also not be ignored. Hon'ble Division Bench in the aforesaid judgement highlighted lack of bona-fide of the Complainant during proceedings before this Commission and the Complainant was

burdened with cost of One Million Rupees (Rs. 1,000,000/-). These complaints, for the reasons stated above, also lack bona-fide.

7. Above in view, RTI Applications of the Complainant appear to be vexatious and the same along with these complaints are rejected.

(Bushra Saqib)
Information Commissioner

(Muhammad Maalik Bhulla)
Chief Information Commissioner