



Human Rights
Commission
of Pakistan

Illegal construction and environmental degradation in the Margalla Hills National Park



An HRCPP fact-finding report

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Introduction

The Margalla Hills National Park (MHNP), established in 1979 under the Islamabad Wildlife (Protection, Preservation, Conservation, and Management) Ordinance, is a protected area in the Islamabad Capital Territory (ICT) that spans approximately 17,386 hectares (42,960 acres). The park encompasses the Margalla Hills, Shakarparian, Bani Gala Hills, and Rawal Lake, extending from Chattar to Sangjani. It was designated as a conservation area to protect Islamabad's natural ecosystem and wildlife while also serving as a recreational space for the city's residents. However, illegal commercial construction of restaurants, resorts, office buildings, hotels, and housing schemes has significantly impacted the area's biodiversity and conservation efforts. The park is home to diverse flora and fauna, including endangered species such as the Himalayan Goral, barking deer, and various bird species, and is currently facing rapid deforestation and habitat destruction, which threatens the city's ecological balance.

Under Section 4 of the 1979 Ordinance, the Islamabad Wildlife Management Board (IWMB) was created but remained dysfunctional until its reconstitution and notification in 2015. The board's broad mandate is to protect and conserve wildlife in the MHNP and ICT, safeguard forests, end wildlife poaching and trade, and control illegal construction and encroachments within the MHNP boundaries. Initially, the Capital Development Authority (CDA)'s environment division managed the MHNP, but the IWMB was granted exclusive authority once it became fully operational in 2015.

To further empower the IWMB, maintain its independence from the CDA, and safeguard the MHNP, Parliament passed the Islamabad Nature Conservation and Wildlife Management Act 2023–24. Although the newly structured law aimed to strengthen the board, it included a provision requiring the federal government to appoint five ex-officio members and four non-ex-officio members. Consequently, in February 2025, the federal government disbanded the board and reconstituted it with bureaucrats, replacing previous members, including its chairperson Rina Saeed Khan. This move is said to be linked to the former IWMB chairperson's role in spearheading the demolition and closure of the Monal and La Montana restaurants in Pir Sohawa, as mandated by the Supreme Court of Pakistan's verdict in September 2024, which ordered the shutdown of these illegal eateries operating within the MHNP. Despite the demolition of the two restaurants being a victory for the IWMB, over 180 illegal structures still appear to exist within the MHNP.

On 11 March 2025—a month after the government disbanded the board on 7 February—the Human Rights Commission of Pakistan (HRCP) conducted a fact-finding mission in Islamabad. The mission included Zofeen T. Ebrahim (environmental journalist), Fahad Malik (environmental lawyer), Nasir Zaidi (HRCP Council member), along with Khushal Khan, Muhammad Asif and Sawera Nazir (staff members).

Between 11 and 14 March, the team met with current and former IWMB chairpersons, former IWMB members, the CDA deputy director general of the environment protection division, the attorney general of Pakistan, civil society activists, and affected residents living in villages near Pir Sohawa (some of whom were also former employees of Monal and La Montana). Additionally, they consulted heads of environmental protection organizations.

The mission's terms of reference included:

- Illegal construction in the MHNP.
- Environmental damage caused by these illegal structures.
- The effectiveness of existing laws in preventing encroachments and the legal loopholes that need to be addressed.

- The responsibilities of government bodies involved in protecting the park and the weaknesses in their enforcement.
- Whether recent changes in the IWMB are affecting conservation efforts and regulatory enforcement.
- Whether the restructuring of the IWMB is strengthening or weakening actions against illegal constructions.

The mission concluded with recommendations to improve enforcement, enhance coordination between authorities, and develop long-term conservation strategies to protect the MHNP.

The Islamabad Wildlife Ordinance and MHNP

Under the Islamabad Wildlife Ordinance 1979, the federal government issued three notifications in April 1980, designating all non-urbanized public open spaces within the ICT area as ‘wildlife sanctuaries’. These spaces excluded areas that had been declared a ‘national park’ (that is, the MHNP), the Bani Gala Hills and the CDA nursery in Chak Shahzad. Meanwhile, the Margalla Reserve Forest, the Military Grass Farms (including certain villages in the Margalla Hills), and other segments of ICT around the Rawal Lake area became part of the MHNP. Additionally, all ICT areas, except for the wildlife sanctuaries and MHNP, were declared ‘game reserves’. Following this classification, the ordinance granted the IWMB exclusive authority for the management and administration of the MHNP, a power it did not exercise until 2015.

Illegal construction in the MHNP

When the mission team met with Attorney General Mansoor Awan, he emphasized the need for the federal government to redefine the limits of the MHNP in the master plan, due to state buildings, complexes, and hotels constructed on this so-called protected land. Currently, there are 105 illegally built offices, hotels, clubs, and marquees, along with 77 restaurants and tuck shops in and around the MHNP.¹ Among the more prominent existing establishments that fall within the MHNP are the buildings of the Supreme Court of Pakistan, the Islamabad Club, the Pakistan Monument, and the Pak-China Friendship Centre.

On 6 December 2024—three months after Monal’s closure—the Supreme Court requested a report from the CDA on all illegal constructions operating within the MHNP during a hearing that included Monal’s legal counsel. During the mission team’s meeting with Monal’s CEO and founder, Luqman Ali Afzal, the team noted his frustration at being singled out alongside La Montana (an adjacent restaurant) when nearly 100 other commercial ventures continued to operate. La Montana’s owner, Muhammad Akhtar, expressed similar concerns. The Supreme Court’s order in 2024 came two years after the Islamabad High Court had directed the CDA to seal the Monal restaurant and take control of the Margalla Greens Golf Club, as both were built on encroached MHNP land. However, the golf club remains operational and was not addressed in the Supreme Court’s 2024 verdict.

The CDA deputy director of the Environment Division, Irfan Niazi, informed the mission that while the authority opposed the demolition of Monal and La Montana, it complied with the Supreme Court’s order and submitted a comprehensive list of constructions deemed illegal in the MHNP, including many state and government buildings. However, the Supreme Court took no action in response to the CDA’s submission.

¹ As outlined in the IWMB’s letter to the CDA dated 28 January 2025, to implement the Supreme Court’s order CP 304/2022 dated 21 August 2024.

IWMB vs CDA

Regarding the IWMB's role in the closure of the two restaurants, the CDA's deputy director argued that the board's role was limited to that of an advisory body rather than an executive one. Consequently, it lacked the authority to demolish property based on the Supreme Court's orders and could not acquire land as the CDA could. Concerning the IWMB's mandate as a management board for the MHNP, as outlined in the 1979 Ordinance and reiterated in the 2023 Act, Niazi noted that the latter was hastily approved by Parliament without considering the CDA's 1960 Ordinance, which granted the CDA land acquisition rights in the ICT. He stated that identical protocols cannot be applied across national parks, as they are zoned for specific purposes, including designated recreational spaces. This suggests that Niazi views restaurants within the park as part of these recreational spaces.

When the mission met with former IWMB chairperson Rina Saeed Khan, she highlighted her efforts to shut down illegal operations in the MHNP. To support her claims, she shared a letter, addressed to the CDA in January 2025, demanding the cancellation of all leases it issued to commercial entities in the MHNP. She also wrote to the Dome Restaurant (in Daman-e-Koh) and the Pakistan Tourism Development Corporation (PTDC) in December 2024, ordering a suspension of the former for operating under a PTDC lease in violation of the Supreme Court's order. However, her letters proved ineffective. Within a month, Ms Khan was removed as the IWMB chair.



Meeting with former IWMB chairperson Rina Saeed Khan at her residence in Islamabad

The mission also met with former IWMB member Vaqar Zakaria and former chairperson Dr Anis ur Rehman, who highlighted Ms Khan's environmental preservation efforts in contrast to the CDA, which employs nearly 20,000 staff and generates revenue through various means, including the auctioning of residential and commercial plots in the ICT area. Both agreed that the IWMB should have the autonomy to operate independently, but its ability to do so is hindered by pressure, control, and influence from the CDA.² Senator Mushahid Hussain referred to the CDA as an 'extended arm of the government', lacking environmental knowledge or vision, whereas the IWMB is seen as safe from regulatory capture.

² The CDA argues that the IWMB is only an advisory board, and the CDA should handle all matters related to the MHNP on the grounds of the 1960 ordinance (which predates the establishment of the MHNP in 1979). Meanwhile, the IWMB members and civil society argue that the wildlife board has 'management' in its title; therefore, it has the authority to manage the park and knows more about wildlife conservation, unlike a regulatory authority such as the CDA.

Changes in the IWMB

Questions regarding the new board's legitimacy, independence, and autonomy have arisen since the federal government appointed additional secretary (in-charge) Aisha Humera Chaudhry as chairperson in February 2025. Former IWMB members and civil society activists, including Nilofer Qazi, view the previous board's denotification as 'illegal and unjust'. Following the disbandment and the appointment of the additional secretary, the former board filed a petition in the Islamabad High Court, arguing that some of the new board members, including Chaudhry, do not meet the requirements of Section 3(1) of the 2023 Act. This section stipulates that the IWMB must consist of nine members, four of whom must be experts in biodiversity and wildlife conservation.³ The petition also contends that Section 3 does not explicitly state whether the government's authority to appoint new members allows it to override the previous board's three-year tenure.

Environmental impact

The concerns of former IWMB members and civil society activists extend beyond the legal foundation of the new board. They are not only passionate about preserving the MHNP, particularly the Margalla Hills area, but also distressed about irregular and haphazard urban expansion in the ICT. Activists have identified several civil society and non-governmental organizations, including the International Union for Conservation of Nature (IUCN), as remaining silent on the MHNP issue due to vested interests with development authorities and the federal government.



Mission meeting with the current IWMB chairperson and additional secretary-in charge, Ministry of Climate Change

Meanwhile, IUCN country representative Mahmood Akhtar Cheema and World Wildlife Fund for Nature (WWF) director Rab Nawaz confirmed to the mission team that IUCN and WWF were collaborating to create a new management plan for the MHNP which would be shared with the Ministry of Climate Change once the board was established.⁴ This plan aims to outline the

³ Petition filed in the Islamabad High Court by advocate Umer Ijaz Gilani.

⁴ The new board comprises five ex officio members and no non-ex-officio ones. For the board to be considered complete and operational, four private members are needed. At the time of the mission and meeting with Ms Chaudhry, she confirmed that the ministry had advertised for interested applicants as board members (although this was questioned by the mission as boards do not usually post ads for members). Another grievance from the former IWMB and civil society activists was that the board cannot and should not make decisions until non-ex-officio members have been appointed and the board is fully established—not merely notified. There was no update on the board's formation at the time this report went to print.

MHNP's vision, identify existing management gaps, and devise policies or instruments to manage the protected areas while ensuring a positive visitor experience.

In a meeting with the newly appointed IWMB chairperson Aisha Humera Chaudhry, it became evident that the ministry expected a joint collaborative plan from IUCN, WWF and the CDA. Chaudhry informed the mission team that she had requested standard operating procedures from the former board chair regarding the types of construction allowed in the MHNP and certain operating costs, enabling her team to begin their work. She assured the mission that she would welcome all technical input regarding the park, emphasizing that the Margalla Hills were 'the city's lungs', deserving protection and preservation. Since her appointment, the IWMB has achieved notable milestones, including filing first information reports (FIRs) against poachers in the hills and enhancing staff patrolling systems.

A positive outcome from the fact-finding mission and meetings with various stakeholders was that the attorney general Mansoor Awan directed the relevant departments to promptly establish the new board (four non-ex-officio members are yet to be appointed), finalize the park's management plan, and reassess the CDA's current influence on the IWMB to ensure its independence.

While the current IWMB's enthusiasm is undeniable, reports have surfaced of former Monal and La Montana employees confronting the previous board with threatening messages to withdraw their court cases. Evidence shared with the mission included an FIR filed by Rina Saeed Khan against persons accused of harassment and attacking her residence. Activists advocating for the former IWMB believe that the previous members are also facing a slander campaign orchestrated by the Monal group following its closure. Additionally, the mission learned that the Islamabad Chamber of Commerce (ICC) had secretly threatened the previous IWMB chairperson on multiple occasions, warning that the board's operations should be shut down or there would be consequences.

Mission's site visit

On the way to the site visit at Pir Sohawa on Margalla Hills, the mission team noticed several banners, posters, and graffiti opposing Rina Saeed Khan, Vaqar Zakaria, and Umer Gilani (the lawyer representing the former board in Supreme Court cases). At the Monal and La Montana sites, the team observed the demolished area and interacted with locals from Gokina village, who worked at the two restaurants in various capacities. The villagers expressed unhappiness over the demolition of Monal and were concerned about the lack of job opportunities. When questioned about the environmental damage and traffic congestion caused by the two establishments, the locals refuted these claims, stating that Monal had a well-managed waste disposal system and specifically hired personnel to manage road blockades.

The Pakistan Environmental Protection Agency Act 1997 states that any project undertaken within the ICT area requires environmental approvals in the form of an initial environmental examination (IEE) or environmental impact assessment (EIA). This requirement applies across the ICT region, regardless of who has regulatory control over any particular area. However, it remains unclear whether IEEs or EIAs were conducted for Monal and La Montana. Former IWMB members questioned the absence of the Pakistan Environmental Protection Agency (PEPA) in the entire environmental discourse. To gain PEPA's perspective, the mission team scheduled a meeting with the agency's director, Farzana Altaf Shah, but she was unable to attend.



Mission's site visit to Trail 5, developed by the CDA in the MHNP

Ongoing conflicts and unclear mandates

Through extensive meetings with stakeholders, the mission team learned that the issue extended beyond environmental concerns; it was primarily about which institution held greater authority over managing the MHNP. Those speaking on behalf of the CDA's environmental division could not accept the IWMB as a management entity, given that the CDA has functioned as a regulatory authority since the capital's creation, whereas the IWMB lacks sufficient resources and manpower. It was argued that forest management falls under the CDA's expertise, as it has an exclusive Environment Protection Cell responsible for controlling and extinguishing forest fires during fire seasons—something the IWMB is incapable of doing.

Conclusion

Illegal construction and habitat destruction in the MHNP are not isolated incidents. Rather, they are a microcosm of Pakistan's broader environmental crisis. As this report has revealed, unchecked urban encroachment has led to deforestation, loss of critical wildlife habitats and weakened regulatory institutions. The protracted tug-of-war between the IWMB and CDA underscores systemic governance failures that mirror national struggles over land use, biodiversity protection, and climate resilience. Without urgent, coordinated reforms—clarifying park boundaries, empowering independent conservation bodies, engaging local communities as stewards, and enforcing rigorous environmental assessments—the degradation of the Margalla Hills will continue to reflect and exacerbate Pakistan's escalating environmental emergency.

Recommendations

Based on its findings, the mission recommends the following:

1. **Revised demarcation of the MHNP.** A necessary step is the immediate revised demarcation of the MHNP, as the park includes many areas that are now urbanized settlements, such as Bani Gala and Saidpur Village. A new reconfiguration of the MHNP's boundaries will inform the public about which areas are off-limits and serve as wildlife habitats. The demarcation should also account for community expansion within the MHNP to ensure livelihoods for locals in case other commercial ventures are closed in the future.

The IWMB should also avoid carrying out any demolitions due to the environmental damage this may cause and to remain within its institutional mandate.

2. **Wider civil society consultation.** The government is advised not to take any more arbitrary decisions. Instead, it should hold wider consultations with civil society and subject experts to devise a more comprehensive strategy for demarcation and other key decisions.
3. **Involvement of PEPA.** The federal government should ensure the involvement of PEPA to conduct much-needed EIAs and IEEs before any future commercial structures are built that may have adverse environmental impacts.
4. **Legal and policy reforms.** The various laws and plans enacted over the years affecting the demarcation of the MHNP as well as various institutional mandates must be made consistent such that each institution's mandate is clear and specific to that institution.
5. **Dialogue and better coordination between the CDA, IWMB, Ministry of Climate Change and transparency in IWMB.** Several stakeholders stressed the need to logically analyse the ongoing rift by setting aside 'personal egos', as the CDA is a resourceful organization and the IWMB cannot function without its backing. For the IWMB to be transparent, it is proposed that at least two non-ex-officio members be appointed to maintain a quorum. The board should act as a core team overseeing and managing the newly demarcated park with the CDA's assistance and support.
6. **Protection of MHNP.** The mission emphasizes the importance of protecting the MHNP as a park rich in biodiversity. The communities within the park need to be protected as well and should be made stewards of the park rather than adversaries.
7. **Local government in ICT.** Key stakeholders underscored the role of an effective local government in ICT as a possible solution to end the institutional clash between the IWMB and CDA. Moreover, an elected body is necessary to diminish CDA's statutory powers so the board can function without pressure.