

## Legal Standards for Collection and Use of Evidence in Narcotics Cases in Pakistan

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### **Abstract Abstract**

*Because offenses under the Control of Narcotics Substances Act (CNSA), 1997 carry severe and deterrent penalties, the law prescribes strict and exacting standards for the collection, preservation, and presentation of evidence during investigation and trial. The superior courts have gone to great lengths to interpret and explain these standards with a view to enabling the investigating and prosecuting authorities to secure convictions. Nevertheless, the conviction rate remains unacceptably low. An analysis of the reasons for acquittals set out in court judgments indicates that either the investigating authorities have failed to collect evidence in accordance with rules, or the prosecutors have neglected to produce witnesses or provide them with proper assistance during trial. This article examines recent judicial pronouncements to argue that the legal position regarding the lawful collection and use of evidence during investigation and trial has now attained considerable clarity. Nevertheless, law enforcement agencies and prosecutorial authorities have yet to elevate their professional capacity and investigative standards to optimal levels, a shortcoming reflected in the persistently low rate of convictions. To address this deficiency, specialized training should be imparted to the investigators and prosecutors, coupled with the establishment of effective accountability mechanisms to ensure strict compliance with statutory requirements and to fix responsibility for any violations. Particular attention should be given to recurring shortcomings identified by the courts, including breaches in the chain of custody, inadequate documentation of recovery, inability to substantiate the chemical examiner's report and failures in producing and assisting the witnesses during trial.*

### **Introduction**

Over time, principles of law applicable to offenses punishable under the Control of Narcotics Substances (CNSA) 1997 have been crystallized by virtue of the judgments of the superior courts of Pakistan. First of all, courts interpreted rules relating to recovery of narcotics from the place of occurrence. For example, aside from explaining that police officials are as good witnesses as private witnesses, the courts encouraged the investigators to use modern devices to document recovery proceedings. Next, the courts proceeded to clarify the rules relating to chain of custody. Therefore, it was held that recovery could not be said to have been proved without establishing an unbreakable chain of custody, from the scene of crime to office of the chemical examiner.

After that, rules concerning joint responsibility for total quantity of drugs recovered have been simplified by pronouncing that an accused shall only be held jointly liable for total quantity of drugs if he had knowledge and control over the drugs concealed by his co accused. Following that, the

superior courts proceeded to shed light on the rules respecting identification of the type of the substance recovered and finally, the Courts have delineated the essential contents of a legally admissible chemical examiner's report.

In addition to above, the superior courts have impressed upon the parties to use in-built cameras of their mobile phones to document search, seizure and arrest proceedings to discredit the allegations of false implication. Moreover, the courts went on to observe that interim custody of the vehicle used in transporting narcotics can be handed over to its registered owner, if he had no knowledge of the commission of the offence with his car, and burden of proving knowledge would rest on the prosecution.

Considering the foregoing, it is evident that rules regarding investigation of drug-related offenses have been sufficiently elaborated by the superior courts. Notwithstanding this, rate of conviction remains surprisingly low which may be attributed to a lack of accountability and inadequate training of the investigating and prosecuting officials. To remedy the situation, it is advisable that the reasons advanced by the courts to record acquittals in narcotics cases should be thoroughly examined in order to formulate practical suggestions for improvement.

For ease of reference, this article has been divided into four parts. First, it examines recent judicial pronouncements concerning recovery proceedings. Second, it analyses court decisions relating to maintenance of chain of custody. Third, it considers judicial guidelines regarding the admissibility of chemical examiner's reports. Fourth, it offers recommendations, in light of relevant case law and research studies, aimed at improving the rate of convictions in narcotics cases. Finally, the article concludes with a summary of key findings and observations.

### **I. Collection of Evidence**

In the past few years, the superior courts of Pakistan have on several occasions expressed their concerns about botched investigation carried out by law enforcement agencies, resulting in excessively high rate of acquittals. To correct this systemic weakness, the courts have from time to time interpreted rules to be observed in the investigation and trial of drug-related crimes. These interpretations are meant to serve as guidelines for conducting search, seizure and arrest.

As might be expected, courts have gone to great lengths to clarify these rules. One of the reasons behind their elaborate construction is the fact that the offenses set forth by the Control of Narcotic Substances Act, 1997 are punishable with stringent punishments. Hence, foolproof investigation is expected from the law enforcement authorities to establish the guilt of the accused beyond any shadow of doubt. Simply put, in narcotic cases, given the severity of punishments involved, the bar for the collection of evidence and its use at trial is set higher. Some landmark judgments addressing this issue are discussed below.

#### **a. Association of public witnesses and preparing recovery memo**

In *Naveed Akhtar*, while responding to the assertion of defence that law was violated in recovery proceedings by not engaging private witnesses, the Supreme Court noted that testimony of police officials was as good as testimony of private witnesses, particularly when nothing had been brought on record to substantiate the allegation of animosity between the police and accused.<sup>1</sup> The court held further that section 25 of the CNSA, 1997 excludes the application of section 103 CrPC requiring association of private witnesses during recovery proceeding. Furthermore, reluctance of general public to become witnesses in narcotic cases is a judicially recognized fact.<sup>2</sup> Therefore, recovery cannot be disbelieved for non participation of private witnesses, unless it is proved that the police officials preparing or endorsing the recovery memo had malice towards the accused or the

<sup>1</sup> *Naveed Akhtar v. The State* (2022 SCMR 1784).

<sup>2</sup> *Faisal Shahzad v. The State* (2022 SCMR 905).

recovery memo was prepared at some place other than the place of occurrence.<sup>3</sup>

In the same way, while highlighting the significance of preparing on the spot recovery memo, the Supreme Court declared in *Abdul Ghafoor* that the recovery memo represents a document of critical import in narcotics trial, and it must be prepared on the spot by seizing officer. The object is to rule out the possibility of false implication by establishing that the recovery was effected in presence of the witnesses.<sup>4</sup> Where the seizing officer and recovery witnesses admitted that the recovery memo was prepared at a place other than the place of occurrence at subsequent stage, the recovery was disbelieved. The Court declared that it could not be relied upon to establish that the recovered substance had not been tampered with or was weighed in the manner stated in the first information report (FIR).<sup>5</sup>

#### **b. Use of modern devices**

In *Zahid Sarfaraz*, the Supreme Court urged investigators to use of modern devices, such as the in-built cameras of their mobile phones, to document recovery proceedings.<sup>6</sup> In the opinion of the court, this will protect them against baseless allegations of false implication. The court clarified that as the crimes under the CNSA 1997 attract severe punishments, infallible evidence is required to justify convictions. Furthermore, since the recovery itself constitutes the crime, entailing punishment, every effort should be made to capture the same faultlessly from the place of occurrence to its transmission for chemical analysis.<sup>7</sup> In view of this, the investigators have been advised to record on video and and photograph searches, seizures and arrests to ensure the collection of credible evidence using their mobile phone cameras.<sup>8</sup> Although section 25 of the CNSA dispenses with the requirement to associate private witnesses during recovery proceedings, article 164 of *Qanoon-e-Shadated Order (QSO)*, 1984 makes admissible evidence obtained through modern devices, including mobile phone cameras. Therefore, to bring transparency in recovery proceedings, two precautions should be taken. First, the recovery should be video-graphed and photographed using mobile phone cameras. Second, the recovery memo should be signed on the spot by the seizing officer after being endorsed by two witnesses. As pointed out by the court in *Zafar Khan*:

*In the cases of narcotic substances, recovery memo is a basic document, which should be prepared by the Seizing Officer, at the time of the recovered articles, containing a list thereof, in presence of two or more respectable witnesses and memo to be signed by such witnesses. The main object of preparing the recovery memo at the spot and with signatures of the witnesses is to ensure that the recovery is effected in presence of the marginal witnesses, honestly and fairly, so as to exclude the possibility of false implication and fabrication. Once the recovery memo is prepared, the next step for the prosecution is to produce the same before the Trial Court, to prove the recovery of the material and preparation of the memo through the Scribe and the marginal witnesses.*<sup>9</sup>

#### **c. Joint recovery**

With regard to cases involving joint recovery from multiple accused, the Supreme Court observed that each accused shall be held liable only for the quantity of drugs recovered from him. He cannot be held responsible for total recovery, including drugs recovered from co-accused. To establish joint

<sup>3</sup> *Abdul Ghafoor v. The State* (2022 SCMR 819).

<sup>4</sup> *ibid.*

<sup>5</sup> *Abdul Basit v. The State* (2018 SCMR 1425).

<sup>6</sup> *Zahid Sarfaraz Gill v. The state* (2004 SCMR 934).

<sup>7</sup> *Asif Ali and another v. The State* (2024 SCMR 1408).

<sup>8</sup> *Zahid Sarfaraz Gill v. The state* (2004 SCMR 934).

<sup>9</sup> *Zafar Khan and another v. The State* (2022 SCMR 864).

liability for the total quantity of drugs recovered from a vehicle, it must be proved that the accused had knowledge and control over the drugs carried by the co accused.<sup>10</sup> While a driver can be presumed to have knowledge of the drugs concealed in different compartments, shelves or cavities of the vehicles, no such presumption can be drawn with respect to passengers.<sup>11</sup> To hold passengers responsible for total quantity of drugs, the prosecution must establish their knowledge and control over the entirety of the consignment.<sup>12</sup>

#### **d. Interim custody, liability of owner and change of ownership**

Recently, judiciary has intensified its scrutiny of regulations governing the interim custody of vehicles impounded in connection with drug related offenses. Consequently, the apex court noted that the CNSA allows the seizure of the vehicles only under three conditions. To begin with, the vehicle must be carrying drugs when stopped by the seizing officer. Additionally, the investigation must have commenced under the CNSA with respect to the drugs recovered from the vehicle. Finally, the vehicle must be designated as case property.<sup>13</sup> With respect to liability of the actual owner, it was observed that if the vehicle was rented and the owner professed ignorance about its use in drug trafficking, he should be presumed innocent, unless his knowledge of the crime was proved by the prosecution.<sup>14</sup>

Along similar lines, Justice Ali Zia Bajwa of the Lahore High Court (LHC) has lately delivered a groundbreaking verdict in a case concerning change of ownership of the vehicle used in drug trafficking, during pendency of trial.<sup>15</sup> As per the facts, subsequent to the registration of FIR, ownership of the vehicle used in transportation of drugs was changed and the said transfer was duly incorporated in the excise record. The court expressed its bewilderment over the change of ownership in the midst of an ongoing trial and held that once the investigation has commenced, the ownership cannot be changed as it becomes case property. Given that changes in ownership can be utilized as a pretext to circumvent legal obligations, it is imperative that such maneuvers be proactively deterred at every level of administration. For that reason, the court proceeded to set aside the transfer of ownership in the excise record and concluded that in future no vehicle can be bought or sold without obtaining a no-objection certificate from the excise department that the vehicle has not been seized in connection with an offence under CNSA.

In addition to clarifying the legal principles governing the recovery of narcotics, the superior courts have consistently underscored the necessity of establishing an unbroken chain of custody for the case property. It is well settled that, in the absence of proof demonstrating the safe custody of the recovered narcotics, the report of the Government Analyst cannot be safely relied upon.<sup>16</sup> The court remarked:

*Although prosecution produced oral testimony regarding the recovery and movement of the case property, it did not tender any documentary evidence to prove its safe custody or secure transmission. Specifically, it failed to produce extracts from the Register Nos. II and XIX of the police station, or the Road Certificate, as required under the law. As a result, the safe custody of the seized narcotics as well as the secure transmission of the representative samples to the PFSA*

<sup>10</sup> Shan Zeb Khan v. The State, Tayyab Abbassi v. the State (Criminal Appeals nos. 16/20233, 177/2023, 178/2023 & 179/ 2023 Islamabad High Court).

<sup>11</sup> Kashif Ameer v. The State (PLD 2010 SC 1052).

<sup>12</sup> Feroz Shah v. The State (Spl.Cr. Appeal No.D-287 of 2019 (Sindh High Court).

<sup>13</sup> Abid Latif v. The State (2008 YLR 1767 Lahore); See also Javed Hayat and another v. The State (PLD 2006 Lahore 167) and Zakaria Ali v. The State (2023 SCMR 781).

<sup>14</sup> See Sec.32 of The Control of Narcotic Substances Act, 1997 See also Allah Ditta v. The State (2010 SCMR 1181).

<sup>15</sup> Muhhamd Riaz v. The State (Crl. Appeal No. 9528/2024 of Lahore High Court, Lahore).

<sup>16</sup> Naseem Kousar v. State (PLJ 2026 Cr.C. 63 ).

remained unproven. The mere production of a positive report from the PFSA did not cure this omission, as it could not establish the integrity of the chain of custody.<sup>17</sup>

Considering the above, the following section examines most recent judicial pronouncements relating to safe custody.

## II. Chain of Custody

The supreme court declared in *Muhammad Iqbal* that proof of an unimpeachable chain of custody of the case property is *sine qua non* for securing a conviction in a narcotics trial. Failure to establish safe custody and secure transmission of the samples to the forensic science laboratory renders the report of the chemical examiner untrustworthy and unreliable.<sup>18</sup> In a more recent case, the Lahore High Court (LHC) construed the meanings of safe custody. According to court's ruling in *Shahadat Ali*, safe custody begins with seizure of prohibited drugs, and includes, separation of a reasonable quantity of drugs to make representative samples, transmission of the representative samples to the forensic science laboratory for chemical analysis and storage of the remaining drugs in judicial locker or *Malkhana*.<sup>19</sup> Any lapse in control or possession of the representative samples will compromise the credibility and conclusiveness of the chemical examiner's report. Thus, the chain of custody of representative samples was held to be impaired, and the report of chemical examiner untrustworthy, where the seizing officer failed to hand over the samples to the *Moharrar* for safe custody and instead retained them until their dispatch to the chemical analyst.<sup>20</sup> Similarly, in *Mohsin Alvi*, safe custody was disbelieved on account of glaring inconsistencies in the statements of the complainant and the investigating officer regarding number of parcels prepared to store the case property and personal belongings of the accused.<sup>21</sup> Further doubt was cast on the integrity of chain of custody due to a significant discrepancy between the weight of the recovered narcotics as recorded in the FIR and the weight reported by the chemical examiner.<sup>22</sup> As reference by the court in *Laique*, where the FIR recorded a recovery of 1500 grams, but the Chemical Examiner's report indicated a different weight e.g., 1300 grams, the chain of custody was held to be broken.<sup>23</sup>

Comparatively, in *Shafqat Iqbal*,<sup>24</sup> the LHC observed that it is now well settled that if the safe custody of recovered substance or its representative samples has not been proved, there is no need to discuss the merits of the case and the accused shall be acquitted forthwith. The court pronounced that if the accused was not put up in statement under section 342 CrPC as to who at the place of occurrence handed over the case property<sup>25</sup> to whom for taking the same to police station, who brought the same from the crime scene to police station, and to whom it was entrusted at the police station, chain of custody could not be said to have been established. Alongside this, the accused should be put up in statement under section 342 CrPC as to who handed over the samples to whom for transmission to forensic science laboratory and who actually delivered it. Without fulfilling this requirement, conviction must not be recorded, as recovery is not merely a corroborative piece of evidence in narcotics cases; rather it constitutes the offence itself.

Besides the foregoing, the superior courts of Pakistan have also considered at length the law governing the chemical examiner's report. Just as a recovery memo carries central importance in a

<sup>17</sup> *ibid.*

<sup>18</sup> *Muhammad Iqbal v. The State* (2025 SCMR 704).

<sup>19</sup> *Shahdat Ali v. The State* (2024 CCJ 37 LHC).

<sup>20</sup> *ibid.*

<sup>21</sup> *The State v. Mohsin Alvi* (Sessions Case No.160/2024 & Sessions Trial # 85/2024 of Special Judge CNSA Attock).

<sup>22</sup> *ibid.*

<sup>23</sup> *Muhammad Laique v. The State* (Cr. Appeal # D-13/ 2020 of Sindh High Court, Circuit Court, Larkana).

<sup>24</sup> *Shafqat Iqbal alias Bailu v. The State* (PLJ 2026 Cr.C. Lahore 83).

<sup>25</sup> Comprising separate parcels of recovered substance and representative samples.

narcotics trial, the chemical analyst's report represents a crucial stage in the investigation, upon which the conviction or acquittal of the accused depends. If the report is not prepared in accordance with established guidelines, it cannot be relied upon as evidence against the accused.<sup>26</sup> Such an omission not only raises questions about the recovery and chain of custody but also casts doubt on the nature of the substance recovered.

### III. Chemical examiner's report

#### a. Tests and protocols to be applied

The chemical examiner's report embodies the primary document on the basis of which it can be proved that the substance recovered from the accused was narcotics within the meanings of section 9(a), 9(b) or 9(c) of the CNSA.<sup>27</sup> Furthermore, the report confirms or denies the assessment of the seizing officer as to the weight of the recovered substance. Since the report is admissible *per se*, the government analyst is not required to appear in court to affirm its findings.<sup>28</sup> Accordingly, the courts place emphasis on ensuring the report's authenticity and credibility. To this end, the chemical examiner must comply with the requirements of the Control of Narcotics Substances (Government Analyst) Rules 2001.

Broadly, these rules require that the report disclose the following particulars. Firstly, the types of tests applied to identify the nature of the recovered drug; next, the protocols followed to conduct the tests; and finally, the conclusions drawn.<sup>29</sup>

In *Qaiser Javed*, it was held that a chemical test conducted without specified protocols loses its credibility. To fulfill the requirements of Government Analyst Rules 2001, the chemical report must contain the following particulars:

- i. The tests applied
- ii. The protocols applied to carry out the tests, and
- iii. Result of the tests<sup>30</sup>

Likewise, in *Boota*, it was held that confirmatory forensic report establishing the narcotic character of a recovered substance must be supported by protocols prescribed under Rule 6 of the Government Analyst Rules 2001. Failure to disclose the protocols applied renders the report unreliable.<sup>31</sup> For greater clarity, the court in *Shahdat Ali* reaffirmed that any failure to follow or mention the prescribed protocols disqualifies the document from being recognized as a report under Section 36 of the CNSA 1997, preventing its use as conclusive evidence.<sup>32</sup>

In the same vein, the Court declared in *Khair ul Bashr* that, under the applicable rules, the chemical analyst's report must specify the tests and analyses conducted on the alleged drug, the protocols applied in carrying out those tests, as well as the results obtained.

These are key components of a valid report, and failure to disclose them will undermine the credibility of the report under section 36 of the CNSA. Although the report is admissible without formal proof, it may be rebutted if found deficient in providing these details.<sup>33</sup>

#### b. Identifying the type of drug

Pertaining to identification of the type of drug recovered, the court is of the considered view that recovery of a huge quantity of *poast* or poppy plant from the accused does not automatically make

<sup>26</sup> The State v. Imam Bakhsh (2018 SCMR 2039).

<sup>27</sup> Qaiser and another v. The State (2022 SCMR 1641).

<sup>28</sup> See Section 510, Code of Criminal Procedure (CrPC), 1898.

<sup>29</sup> The State v. Imam Bakhsh (2018 SCMR 2039).

<sup>30</sup> Qaiser Javed Khan v. The State (PLD 2020 SC 57).

<sup>31</sup> Muhammad Boota v. The State (2020 SCMR 196); See also Manan Khan v. the State (2025 P C r. L J 1720).

<sup>32</sup> Shahadat Ali v. The State, etc. 2021 P Cr. R (Pesh) Note 6.

<sup>33</sup> Khair ul Bashr v. The State (2019 SCMR 930).

him liable for the offenses under section 9 of the CNSA.<sup>34</sup> To that end, the prosecution must establish how much of the recovered plants carried *doda* or sack-like capsule from which intoxicating substance is extracted.<sup>35</sup> A poppy plant comprises of a number of parts other than the capsule or *doda* including, stems, leaves and seeds. Since none of these have intoxicating properties, mere recovery of poppy should not constitute an offence under CNSA, unless the capsules or sacks are separated from the other parts and duly counted or weighed for applying the relevant section of law.<sup>36</sup>

#### IV. Building a Responsive Criminal Justice System: Reforms, progress, and the Road Ahead

According to a recent research study by Solution for Sustainable Social Development Organisation (SSDO),<sup>37</sup> the prevalence of drug abuse is steadily on the rise, globally. For example, in 2011, there were about 240 million people around the world who had experimented with some kind of drugs. In 2021, this number surged to 296 million. Similarly, the global narcotics trade has experienced exponential growth, with heroin valued at approximately \$33 billion and cocaine at \$88 billion smuggled annually into North America and Europe. This state of affairs calls for reforms in criminal justice systems to maximize convictions through robust investigations to deter or disable the offenders involved in drug trafficking.

Regrettably, in Pakistan, the conviction rate in drug cases has slumped to a new low, and continues to decrease with each passing year. For instance, while the conviction rate in Punjab stood at 16% in 2022, it dropped sharply to a mere 2% in 2023.<sup>38</sup> There may be several factors contributing to this dire state of affairs; however, the report identifies four primary reasons. These include the non-existence of specialized courts; the absence of accountability of public officials for defective investigations and inadequate state representation resulting in acquittals; insufficient emphasis on the training of law enforcement personnel; and the lack of public awareness campaigns.

The report suggests further, with a view to effectively combating trade in narcotics, the offenders must be made to face the consequences of their choices. Achieving this objective requires holding prosecutors and investigators accountable for deficiencies in the investigation and prosecution of narcotics cases culminate in acquittals. In this regard, the guidelines established by superior courts with respect to collection and use of evidence may serve as appropriate benchmarks for evaluating their performance.

As an example, the courts have repeatedly held that maintaining a flawless chain of custody is essential to secure a conviction in narcotics cases. However, in practice, it has been found that statements of Prosecution witnesses (PWs) are frequently inconsistent regarding the safe custody of the case property, often resulting in acquittals.<sup>39</sup> Equally, the report of chemical analyst is routinely disbelieved on the basis that the recovered narcotics remained in police custody for days before it is dispatched to forensic science laboratory.<sup>40</sup> Furthermore, the state prosecutors regularly fail to produce key witnesses during trial, such as *Moharrar* in whose custody recovered substance was given in police station or the Head Constable who took the same to forensic laboratory for chemical

<sup>34</sup> Zulfiqar @ Zulfa v. The State (2021 SCMR 531).

<sup>35</sup> Zafar Iqbal v. The state (2022 SCMR 1375).

<sup>36</sup> Barkhudar v. The State (2023 SCLR 34).

<sup>37</sup> An Overview of Criminal Justice System's Response to Drug Traffickers in Punjab, Report released by Sustainable Social Development Organization (SSDO) available at <https://ssdo.org.pk/media/research-shows-drop-in-conviction-rate-of-drug-traffickers-in-punjab> (Date accessed: 25.02.26).

<sup>38</sup> The Express Tribune (May 30, 2004) 'Conviction Rate For Drug Cases Drops in Punjab' available at <https://tribune.com.pk/story/2468931/conviction-rate-for-drug-cases-drop-in-punjab> (Date accessed: 25.02.26).

<sup>39</sup> Asif Ali and another v. The State (2024 SCMR 1408).

<sup>40</sup> State v. Imam Bakhsh (2019 SCMR 1089).

analysis.<sup>41</sup> These lapses indicate the inability of the investigating officers to prepare the crime report in accordance with law, and the neglect of the prosecutors in training the PWs to face cross examination by the defence. Arguably, had the guidelines of the superior courts been implemented by law enforcement officers in letter and spirit, the conviction rate would have been significantly higher than the paltry 2%.

That being said, it may be noted that all is not lost, considering that just a few days ago, sixteen police officers were dismissed from service in Gujranwala city alone for their direct involvement in drug trafficking or in facilitating it, as part of an internal accountability drive.<sup>42</sup> Interestingly, one official was dismissed for favoring the accused by booking him under the lesser charge of liquor possession rather than drug trafficking, thereby shielding him from the more stringent punishment associated with the latter.<sup>43</sup> Nonetheless, greater efforts are required to ensure that officials responsible for critical mistakes such as delays in submitting samples to chemical examiner or the non-production of key witnesses during trial are held accountable. In addition, due heed should be paid to findings of SSDO report, particularly, its recommendations regarding the appointment of specially trained personnel to investigate drug crimes and the requirement for prosecutors to properly educate witnesses before testifying in court.<sup>44</sup>

### Conclusion

In the final analysis, it can be argued that the higher courts have painstakingly interpreted rules governing the collection and use of evidence in narcotics trial. However, the objective of bringing to justice drug traffickers cannot be served unless these rules are implemented in both wording and intent by the law enforcers. Given that members of the general public often hesitate to testify in such cases due to fear of retaliation from drug traffickers, the evidence placed before the court must be sufficiently credible and cogent to withstand scrutiny and eliminate any reasonable doubt in favor of the accused.

Logically, the more detailed the elaboration of rules is, the better should be their compliance. Nonetheless, this has not been the case as the conviction rate has fallen to meagre 2% as a result of lack of professionalism among investigating and prosecuting authorities. Accordingly, it is suggested that together with establishing robust mechanisms of accountability, specialized training should be imparted to drug enforcement authorities and prosecutors to implement these judicial directions in full compliance.

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<sup>41</sup> Mst. Sakina Bibi v. The State (PLD 2020 Supreme Court 458).

<sup>42</sup> The Express Tribune (Shahzad Akram-February 13, 2026) available at <https://tribune.com.pk/story/2592260/16-gujranwala-cops-sacked-over-drug-links> (Date accessed: 25.02.26).

<sup>43</sup> Ibid.

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