



Public Interest Litigation in Pakistan Landmark Cases and Judicial Influence on Governance

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Abstract: Public Interest Litigation (PIL) allows individuals and organizations to bring legal cases on behalf of the public to address societal problems such as human rights abuses, environmental degradation, and corruption. In the Pakistani Supreme Court, PIL has emerged as a significant mechanism for addressing these concerns. This paper discusses the significance of PIL, the issues encountered in its practice, and a few landmark cases. The Supreme Court has repeatedly evolved well-founded legal norms governing PIL, thereby empowering the underprivileged sections of society. Cases such as Shehla Zia vs. WAPDA and the Suo Moto Case regarding Lahore smog exemplify how the judiciary takes initiative to secure rights and hold authorities accountable. PIL has impacted public policy and transformed societies by improving accountability among governing bodies. However, PIL faces challenges, including issues of admissibility, the potential for time-consuming legal actions, and the risk of abuse for personal or political gain. The tension between the judiciary and the principle of the separation of powers is a critical factor in maintaining judicial independence. To optimize PIL, it is essential to enhance public awareness, particularly regarding legal rights, and to establish an efficient legal aid service.

Keywords: Public Interest Litigation (PIL), Supreme Court of Pakistan, Social Justice, Human Rights, Environmental Concerns, Legal Accountability.

1. Introduction

In the 20th century, the concept of Public Interest Litigation (PIL) used as a consequential instrument within the legal frameworks of numerous nations with aims to equitable redress of substantial societal grievances (Rahim et al. 2024) Historically, the genesis of PIL is inextricably linked with the civil rights movements, environmental advocacies, and socio-economic upheavals. Moreover, the fundamental principle underlying PIL is to address and resolved public grievances, particularly those experienced by marginalized groups or individuals with restricted access to legal resources (Oloka-Onyango 2017) (PIL) is a legal mechanism that enables individuals or organizations to initiate legal proceedings on behalf of the general public or disadvantaged segments of society. Within the Supreme Court of Pakistan's framework, public interest litigation has arisen as a potent mechanism for addressing societal concerns and championing the rights and welfare of the wider populace. Public Interest Litigation (PIL) cases frequently centre around issues of significant societal relevance, encompassing areas such as human rights transgressions, environmental considerations, instances of corruption, and the availability of fair legal

recourse (M. S. Khan, 2014). The Supreme Court of Pakistan, the apex judicial body in the nation, assumes a pivotal role in advancing and facilitating public interest litigation. Over time, the court has developed a robust body of legal principles and precedents in the field of Public Interest Litigation (PIL), which offers individuals and entities a means to pursue legal redress for matters that impact the broader public (Alam, 2016). This study analyzes the importance and influence of public interest litigation within the Supreme Court of Pakistan. This study explores the fundamental characteristics, development, and obstacles to Public Interest Litigation (PIL) within the legal framework of Pakistan. Furthermore, this study explores prominent instances that have influenced the framework of public interest litigation, emphasizing the judiciary's function in safeguarding fundamental rights, advancing effective governance, and redressing societal inequities. (Tariq et al. 2024) Implementing public interest litigation within the Supreme Court of Pakistan has brought about substantial changes to the legal environment, broadening the range of legal activism beyond personal interests and encompassing broader societal issues. PIL (Public Interest Litigation) cases have significantly contributed to fostering constructive societal transformation, influencing public policy, and ensuring accountability among governing bodies. Furthermore, public interest litigation has become crucial for marginalized communities and vulnerable populations to pursue justice and safeguard their entitlements (Bhuwania, 2017). Nevertheless, public interest litigation encounters various challenges, such as concerns regarding legal standing, prolonged court proceedings, and the necessity for sufficient resources and specialized knowledge. The careful consideration of balancing the necessity for judicial activism with the principle of separation of powers represents an additional facet that warrants attention.

The development of the Public Interest Litigation (PIL) concept in Pakistan can be classified into four distinct stages. The stages above illustrate the evolving approach and extent of Public International Law (PIL) in tackling matters of public interest. The stages can be delineated as follows:

1.1 Activist Phase

In this phase, the courts acknowledged the necessity of loosening the conventional locus standi requirement, which imposed restrictions on the ability of unrepresented and marginalized groups to seek justice. The judges assumed an activist stance by actively engaging in attentively hearing and addressing the grievances and injustices experienced by individuals in vulnerable positions. The objective of this phase was to mitigate the occurrence of lawlessness, corruption, and the erosion of the rule of law within society (Abbas, 2021).

1.2 Relaxation of Locus Standi

the subsequent phase witnessed a recognition by the courts of the significance of broadening the narrow confines of locus standi, thereby granting the opportunity for affected individuals or organizations to initiate Public Interest Litigation (PIL) cases. This particular stage represented a notable transition in acknowledging the legitimacy of individuals who have been wronged to bring attention to matters of public interest. Landmark legal cases, namely *Benazir Bhutto v. Federation of Pakistan* (PLD 1988 SC 416) and *Darshin Masih* (PLD 1990 SC 513), have significantly contributed to the establishment and development of Public Interest Litigation (PIL) in Pakistan (Lau, 1995).

1.3 Limitations and Procedural Concerns

The third stage of the study highlighted the procedural relaxation limitations of Public Interest Litigation (PIL). The judiciary initiated efforts to tackle matters about the abuse or misapplication of Public Interest Litigation (PIL), aiming to strike a harmonious equilibrium between the welfare of the general public and the appropriate adherence to legal protocols. The case of *Ardeshir Cowage v. Multiline Associates, Karachi* (PLD 1990 SC 513) exemplifies a judicial examination of procedural considerations and emphasizes the importance of upholding a just equilibrium.

1.4 Shift to Defending Private Interests

The fourth stage of Public Interest Litigation (PIL) marked a notable transition in its primary focus, shifting from primarily addressing public interest concerns to cases centering around the defense of one private interest against another. The transition above is evident in the legal matter of *Benazir Bhutto v. Federation of Pakistan* (PLD 1988 SC 416), wherein the focus shifted from advocating for marginalized populations to safeguarding the rights of individual privacy concerns. This stage underscored the evolving dynamics and obstacles encountered by PIL in upholding its initial purpose (Nardi Jr, 2008).

The stages above illustrate the progression of Public Interest Litigation (PIL) in Pakistan, commencing with an

activist approach that sought to redress social injustices and subsequently evolving towards a more nuanced comprehension of its constraints and the imperative for procedural equity. While Public Interest Litigation (PIL) remains instrumental in promoting public interest matters, it is imperative to maintain a delicate equilibrium between upholding public interest and ensuring the protection of individual rights and procedural integrity.

Public interest litigation in the Supreme Court of Pakistan plays a crucial role in safeguarding public interests and promoting social justice. It enables individuals and organizations to assert their concerns regarding matters of public significance and pursue remedies for systemic problems. Through a comprehensive analysis of the development, influence, and obstacles associated with public interest litigation, a deeper understanding can be obtained regarding its importance in fostering a fair and impartial society within the context of Pakistan.

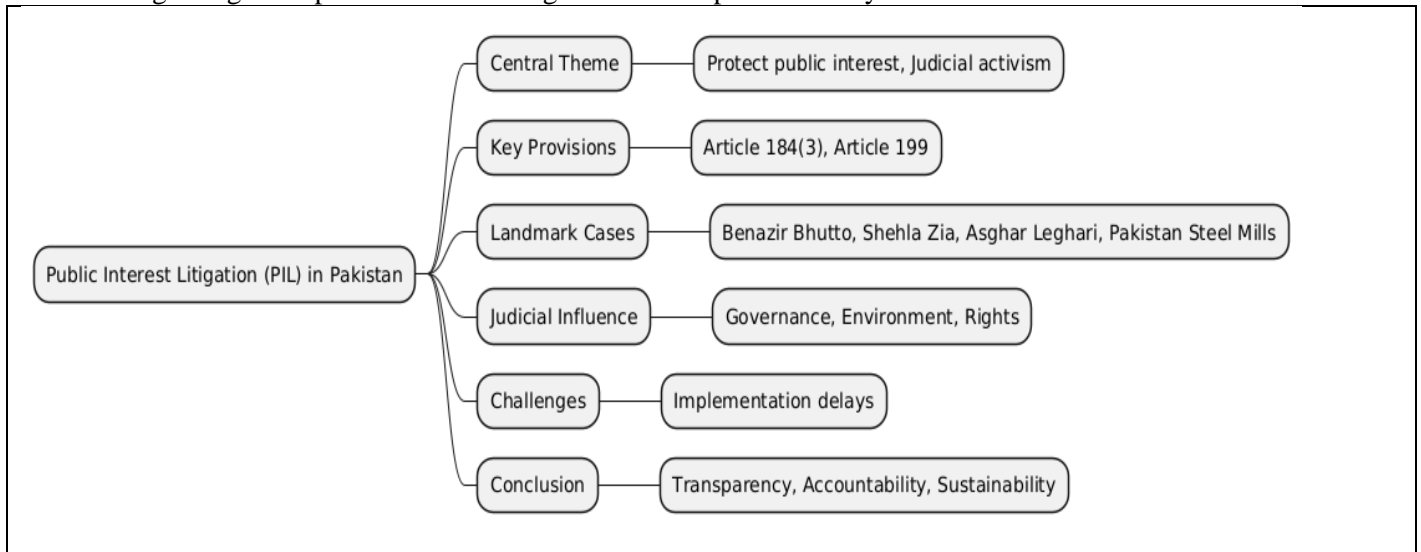


Figure 1: Overview of Public Interest Litigation in Pakistan

Source: Author constructed based on survey of previous documents

1.5 Research Problem

This research endeavour aims to examine the efficacy and consequences of Public Interest Litigation (PIL) in Pakistan, with a particular emphasis on its capacity to tackle matters of public interest, advance social equity, and shape legal and societal consequences. The study seeks to offer a comprehensive understanding of the consequences, difficulties, and ramifications of Public Interest Litigation (PIL) in Pakistan's legal and socio-political landscape through a case study methodology.

2. Methodology

The research for this study is primarily analytical, argumentative, and conceptual. It focuses on legal doctrines and regulations, using both argumentative and analytical approaches. A theoretical analysis of legal doctrines is employed, assessing the effects of current regulations and considering various levels of action. Contemporary methodological perspectives in legal science are utilized, along with an analysis of concepts, examination of present and potential case law scenarios, synthesis of opposing opinions, formulation of broad-to-narrow-impact arguments, explication of divergent views, and construction of premises relevant to the legal framework and ethical constraints applicable to various professions. The paper includes an analysis of jurisprudential solutions from national courts and their effects on legal practice. Research findings are presented using the comparative method, offering a thorough understanding of the ethical and legal dilemmas concerning PIL and public concerns. Additionally, the study addresses research limitations and suggests potential avenues for further analysis in future research.

2.1 Research questions

The evolution of Public Interest Litigation (PIL) in Pakistan has undergone significant changes over the years. This academic inquiry seeks to explore the key factors that have contributed to the country's development and implementation of PIL.

1. What are the notable instances of Public Interest Litigation in Pakistan, and what were their outcomes in advancing public interest, safeguarding rights, and shaping legal precedents?
2. To what degree has Public Interest Litigation demonstrated efficacy in addressing matters of social justice, fostering accountability, and protecting public interest within Pakistan?
3. To what extent has Public Interest Litigation been effective in addressing social justice concerns, promoting accountability, and safeguarding public interest in Pakistan?
4. What are the challenges and limitations associated with the practice of Public Interest Litigation in Pakistan, and how can they be addressed to enhance its effectiveness and impact?

The practice of Public Interest Litigation (PIL) in Pakistan is confronted with various challenges and limitations. These obstacles hinder the effectiveness and impact of PIL. In order to enhance its efficacy, it is imperative to address these challenges. One of the primary challenges PIL faces in Pakistan is the need for more awareness and understanding among the general public regarding their rights and the potential benefits of PIL. This limited awareness restricts the participation of individuals.

The present study will be guided by research questions to explore various aspects of Public Interest Litigation (PIL) in Pakistan. These questions will explore the evolution, effectiveness, impact, challenges, and potential avenues to improve PIL within the country. The research outcomes will enhance comprehension of the role of Public Interest Litigation (PIL) in advancing social justice, safeguarding the public interest, and influencing legal and societal consequences within the specific context of Pakistan.

3. Concept and Evolution of Public Interest Litigation

Public Interest Litigation (PIL) is a distinctive aspect of the legal domain that deviates from conventional litigation practices by redirecting attention from individual grievances to broader societal issues. Public Interest Litigation (PIL) refers to the legal proceedings initiated in courts of law to enforce public interest or protect the general public's rights, particularly when a substantial portion of the public is adversely affected. Public Interest Litigation (PIL) expands the reach of traditional legal proceedings by encompassing matters of public importance rather than being limited to individuals with a personal or direct stake. This inclusive approach to justice promotes more democratic access to the legal system (Ullah, 2018).

The primary objective of Public Interest Litigation (PIL) is to rectify infringements upon the fundamental human rights of individuals who are economically disadvantaged and socially marginalized. PIL also seeks to address cases of severe injustice inflicted upon communities and other societal wrongs that may not be adequately resolved within the confines of the conventional legal system. The focal point lies in actualizing collective rights, fulfilling public obligations, and implementing constitutional and legal rights for individuals who may lack the resources or knowledge to seek legal recourse.

The essence of Public Interest Litigation (PIL) resides in facilitating the democratization of the locus standi principle, which pertains to the right or ability to initiate legal action or present oneself in a court of law. Public Interest Litigation (PIL) expands the notion of locus standi beyond the necessity of a specific legal injury to encompass a more inclusive interpretation, allowing individuals or collectives acting in the public interest to seek legal redress for a public injustice (Tripathi, 2007).

Through expanding the scope of judicial review and empowering the judiciary to address public grievances, Public Interest Litigation (PIL) emerges as a potent tool for effecting social transformation. It engenders judicial activism and promotes accountability, transparency, and good governance within public administration. This approach facilitates greater accessibility to justice for individuals and incorporates a societal lens into legal frameworks, thereby advancing the principles of fairness and inclusiveness.

3.1 Historical Background

The historical trajectory of Public Interest Litigation (PIL) in Pakistan is intricately intertwined with the nation's political and constitutional advancements. The inception of Public Interest Litigation (PIL) in Pakistan is commonly attributed to the latter part of the 1980s after the conclusion of Zia-ul-Haq's period of martial law and the year 1988 witnessed the reinstatement of democratic governance led by Prime Minister Benazir Bhutto, which concurrently signalled the re-emergence of the judiciary's function in safeguarding constitutional rights. The Pakistani judiciary, led by Chief Justice Muhammad Haleem, initiated an examination of the concept of Public Interest Litigation (PIL) as a means to achieve social justice (Anima, 2022).

The pivotal moment occurred in 1994 with the significant legal case, *Shehla Zia v WAPDA*. The Supreme Court of

Pakistan has expanded the traditional *locus standi* principle by acknowledging environmental degradation as a violation of the right to life. Consequently, the court has granted any aggrieved individual the right to initiate legal proceedings. It established the groundwork for Public Interest Litigation (PIL) in Pakistan (Jawad et al., 2022). The proactive nature of the Pakistani judiciary's approach to Public Interest Litigation (PIL) witnessed a notable increase during the late 1990s and early 2000s, particularly during the tenure of Chief Justice Iftikhar Chaudhry. During his tenure, the Supreme Court demonstrated a proactive approach by frequently exercising its 'suo Motu' jurisdiction, wherein it independently initiated legal proceedings and assumed cognizance of various matters. During this particular era, numerous public interest litigation (PIL) cases encompassed a diverse array of subjects, such as human rights, governance, corruption, and environmental protection (Anthony et al., 2022).

Nevertheless, the utilization of PIL (Public Interest Litigation) in Pakistan has been a subject of contention. Critics contend that an overabundance of judicial activism via Public Interest Litigation (PIL) poses a potential encroachment upon the jurisdictions of the executive and legislative branches, thereby impeding the principle of separation of powers. Furthermore, they express apprehensions regarding the possible exploitation of Public Interest Litigation (PIL) for individual or partisan advantages.

Advancements and obstacles characterize the historical trajectory of public interest litigation (PIL) in Pakistan. The notion has transformed throughout history, primarily shaped by shifts in the nation's political landscape and the judiciary's stance on matters of social equity. Despite the ongoing debates surrounding its utilization, Public Interest Litigation (PIL) continues to hold significant importance as a legal instrument for protecting the public interest and promoting human rights advancement within Pakistan.

4. Role of PIL in Social Justice and Judicial Activism

Public Interest Litigation (PIL) has emerged as a potent instrument for the enforcement of public interest, the protection of human rights, and the advancement of social justice. It plays a transformative role in the legal landscape, extending the reach of the law to marginalized and vulnerable sections of society (Pitto, 2022). In the specific context of Pakistan, Public Interest Litigation (PIL) assumes a prominent role in the pursuit of social justice and the promotion of judicial activism. The following is a step-by-step guide to accomplishing the task at hand. The redressal of collective rights is facilitated through Public Interest Litigation (PIL), which enables individuals and organizations to pursue legal recourse on behalf of groups of individuals whose rights have been infringed upon. It facilitates the capacity of the legal system to confront social injustices that impact a significant portion of the population, which may otherwise remain unnoticed or unattended as a result of limited individual resources or legal acumen (Anima, 2022).

Public Interest Litigation (PIL) serves as a mechanism for judicial activism, wherein the judiciary assumes an assertive stance in interpreting legal statutes and the Constitution, aiming to advance principles of justice, equality, and safeguarding human rights. The significance of this matter is particularly pronounced within the context of Pakistan, where disparities between constitutional principles and the actualities of socio-economic circumstances frequently exist.

The Public Interest Litigation (PIL) framework plays a crucial role in enabling legal avenues for individuals belonging to marginalized or disadvantaged groups, such as women, children, minorities, and individuals experiencing poverty. The concept under consideration can serve as a mechanism for monitoring and evaluating the actions or lack thereof by states and institutions, which may contribute to the persistence of social disparities (A. Khan et al., 2019).

Public Interest Litigation (PIL) is crucial in promoting accountability and transparency within public authorities. Public Interest Litigation (PIL) means the judiciary possesses the authority to examine the conduct of public entities and individuals, thereby ensuring their adherence to legal obligations and prevention of power abuse. Public Interest Litigation (PIL) facilitates the promotion of constitutional rights, which serves as a crucial mechanism for safeguarding and enforcing the rights that the Constitution of Pakistan guarantees. Public Interest Litigation (PILs) can serve as a means to safeguard fundamental rights such as the right to life, dignity, and equality before the law.

PIL has played a significant role in safeguarding environmental preservation and consumer welfare within Pakistan. Many legal cases have been initiated in the public's interest, addressing concerns such as environmental pollution, unauthorized construction activities, and infringements upon consumer rights. The role of Public Interest Litigation (PIL) in Pakistan has played a crucial role in advancing social justice and fostering a proactive judiciary. However, it is important to acknowledge that certain obstacles and difficulties are also associated with this approach. These factors encompass the possible misapplication of Public Interest Litigation (PIL) for individual or political

purposes, the excessive strain placed on the judicial system, and the potential for the judiciary to exceed its prescribed constitutional mandate (M. S. Khan, 2023).

Furthermore, the efficacy of public interest litigation (PIL) is contingent upon additional variables such as the autonomy of the judicial system, the accessibility of legal resources, and the wider political and socio-economic milieu. Therefore, it is imperative to exercise caution and employ PIL in conjunction with other strategies in order to effectively advance social justice in Pakistan.

4.1 Facilitating Access to Justice

One of the key contributions of PIL lies in its potential to democratize access to justice. By moving away from traditional individualistic litigation towards a model of collective redress, PILs ensure that justice is not confined to individuals who have the resources or knowledge to approach the courts. By addressing issues of public interest, PILs ensure that legal remedies are accessible to all sections of society, particularly the marginalized and underprivileged. Public Interest Litigation (PIL) has played a significant role in enhancing the accessibility to justice through various means (Bhuiyan, 2007).

Expanding the Scope of Locus Standi: Conventional legal proceedings necessitate the plaintiff's ability to establish personal injury or harm. Nevertheless, PIL (Public Interest Litigation) mitigates the necessity of locus standi (legal standing). It grants the opportunity for any individual or organization with a commitment to the welfare of the public to initiate legal proceedings on behalf of individuals who face obstacles preventing them from doing so themselves, such as financial constraints, limited awareness, societal disapproval, or apprehension of retaliation (Salman & Ayankogbe, 2011).

Public Interest Litigation (PIL) serves to streamline intricate and daunting legal procedures, thereby enhancing the accessibility of the court process. Public Interest Litigations (PILs) have the advantage of not requiring costly legal representation, and the judicial system frequently employs a less formal and more adaptable approach when handling such cases. This phenomenon reduces the obstacles faced by individuals with limited legal expertise or financial means. The judiciary in Pakistan has frequently assumed a proactive stance in the pursuit of justice, primarily through the utilization of Public Interest Litigation (PIL). It encompasses the exercise of suo moto cognizance by the court about matters of public significance, wherein the court commences legal proceedings autonomously without necessitating the submission of a formal complaint (S. M. T. Karim, 2019). Public Interest Litigation (PIL) has emerged as a valuable tool for drawing attention to and redressing infringements upon social and economic rights, which frequently encounter challenges when pursued via conventional legal avenues. These encompass fundamental entitlements such as the right to education, healthcare access, a clean environment, and other essential necessities for sustaining life. Public Interest Litigation (PIL) has played a significant role in promoting the development of legal aid services in Pakistan. Organizations and legal practitioners operating within the realm of Public International Law (PIL) frequently offer pro bono legal assistance to marginalized individuals and communities, thereby enhancing the inclusivity of the justice system (Ullah, 2018).

The significance of Public Interest Litigation (PIL) in Pakistan's justice system is noteworthy; however, it is not without its challenges. The concerns above encompass matters about the judiciary's capacity and the occurrence of delays within the court system, the potential for the misuse of Public Interest Litigation (PIL), and the obstacles hindering the execution of court orders. Furthermore, it is imperative to promote legal literacy and raise awareness among the general population to effectively harness the potential of Public Interest Litigation (PIL) in facilitating equitable access to justice.

4.2 Advancing Social Justice

PIL has been pivotal in addressing societal issues and advancing social justice. It has been used to challenge and correct violations of constitutional and statutory rights, discriminatory practices, and administrative wrongdoing. Through PIL, courts have delivered landmark judgments on issues ranging from environmental degradation and health hazards to the protection of the rights of women, children, prisoners, and marginalized communities. Public Interest Litigation (PIL) has undeniably emerged as a catalyst for effecting significant societal change in Pakistan, particularly in advancing social justice (Ali & Aziz-ur-Rehman, 2021). The following are multiple mechanisms through which (PIL) promotes and enhances social justice within the nation (PIL) has been employed as a means to uphold and safeguard the fundamental rights enshrined within the Constitution of Pakistan. Using Public Interest Litigation (PIL), the judiciary has rendered numerous verdicts aimed at safeguarding the rights of individuals and communities from abuse and violations (Abbas, 2021).

The promotion of gender equality has been significantly facilitated by the efforts of PIL, which has played a crucial role in addressing gender-based discrimination and violence issues. (PIL) has been employed by judicial bodies to interpret and uphold legislation aimed at safeguarding the rights of women, as well as to contest practices that perpetuate discrimination. Public Interest Litigation (PIL) has emerged as a significant tool employed by the judiciary to tackle various societal concerns, including but not limited to sexual harassment, domestic violence, and discriminatory laws (Barreto, 2010).

The utilization of (PIL) has been instrumental in ensuring the protection of the rights of marginalized and vulnerable communities. These communities encompass religious and ethnic minorities, individuals with disabilities, and those who face economic disadvantages. The judiciary has intervened to halt coerced displacements, guarantee access to fundamental amenities, and safeguard against discrimination and violence. Environmental justice has been significantly promoted by using (PIL). The intervention of courts through Public Interest Litigation (PIL) has been instrumental in preventing environmental degradation, safeguarding the right to a clean environment, and ensuring the effective enforcement of environmental regulations (Dewan, 2010).

Public Interest Litigations (PILs) have been employed to uphold labor rights, encompassing the enforcement of minimum wage regulations, the provision of safe working environments, and the protection of the right to engage in union activities. The judiciary has intervened to safeguard the rights of individuals employed in informal sectors, minors engaged in labor, and individuals subjected to bonded labor. The (PIL) framework serves as a mechanism to ensure institutional accountability in malpractice cases. Public Interest Litigation (PIL) has been utilized to contest unlawful activities and corruption by various entities, including government agencies, private corporations, and public officials (Jayasurya, 2008).

Public Interest Litigation (PIL) has been utilized as a legal mechanism to safeguard the entitlements of individuals to health and education. Instances have arisen where PIL cases have been initiated to guarantee the availability of sufficient healthcare infrastructure and promote accessibility to education, particularly for marginalized populations. Nevertheless, although the Pakistan Institute of Law (PIL) has demonstrated efficacy in numerous cases, more is needed in its capacity to tackle all social justice concerns within the country comprehensively. For the comprehensive advancement of social justice, it is imperative to supplement PIL with additional mechanisms, including legislative reform, the effective implementation of laws, awareness campaigns, and social change (Alam, 2016).

4.3 Catalyzing Judicial Activism

The emergence of PIL has seen the judiciary transform from being a mere arbiter of disputes to an active champion of public rights. By liberalizing the rule of locus standi, courts have allowed public-spirited individuals and organizations to bring cases of public concern before them. This has led to the growth of judicial activism, with courts now proactively addressing issues of public interest, often influencing policy decisions and legislative changes (S. Karim et al., 2012).

Public Interest Litigation (PIL) has undeniably catalyzed the emergence of judicial activism in Pakistan. The following procedure outlines the steps to accomplish the task at hand.

The expansion of the concept of locus standi has been facilitated by the liberalization of its rules, thereby enabling (PIL) to grant individuals or organizations the ability to petition the court on behalf of those who cannot do so independently. This development has effectively expanded the jurisdiction of courts in assessing issues about matters of public importance, resulting in a proactive engagement by the judiciary in safeguarding the interests and rights of the public. **Suo Moto Cases:** The judiciary, particularly the Supreme Court of Pakistan, has frequently undertaken suo moto actions in matters about matters of public interest. The proactive approach is a manifestation of judicial activism, wherein the judiciary assumes the responsibility of safeguarding public rights and ensuring the maintenance of justice (Abeyratne, 2021).

The influence of (PIL) on policy and legislation is evident through the courts' frequent issuance of rulings and directives that have significantly impacted shaping public policy and legislation. The judiciary has adopted a broad interpretation of laws and constitutional provisions to advance the public interest and foster social justice. Courts have additionally issued directives to public authorities, thereby significantly impacting policy-making processes (M. S. Khan, 2023).

Implementing Public Interest Litigation (PIL) has resulted in increased judicial engagement in ensuring accountability and transparency among public officials and institutions. The judiciary has intervened to mitigate instances of power abuse, corruption, and violations of legal statutes. As a result, there has been an increase in

transparency and accountability within the realm of public administration. The judiciary has assumed safeguarding human rights due to Public Interest Litigation (PIL). The judiciary has frequently adopted a broad interpretation of constitutional and legal provisions to protect and advance human rights. The judiciary has rendered noteworthy decisions in cases about fundamental rights, including the right to life, equality, freedom of speech, and protection against torture (McDonald, 2020).

The judiciary has played an active role in safeguarding the rights of marginalized and vulnerable groups, such as women, children, minorities, and individuals experiencing poverty, through (PIL). While Public Interest Litigation (PIL) has been a catalyst for judicial activism, it is imperative to maintain a balance to prevent the judiciary from exceeding its prescribed constitutional mandate. In order to ensure the efficient operation of a democratic system, it is imperative to uphold the equilibrium of power between the judiciary, executive, and legislature. The exercise of judicial activism should be guided by the principles of judicial restraint and adherence to the doctrine of separation of powers (Abeyratne, 2021).

Moreover, PILs have given the judiciary the opportunity to provide innovative remedies that are not confined to legal precedent but are shaped by social, economic, and political considerations. These innovative remedies have often included court-monitored investigations, implementation of reformatory measures, and the establishment of commissions or committees to oversee enforcement. However, while PILs play a crucial role in social justice and judicial activism, it is imperative to ensure they are not misused for personal or political gain. A balance must be maintained between allowing access to justice for genuine causes and curbing misuse. This calls for consistent judicial scrutiny and guidelines to ensure the judicious use of PIL (Bhuvania, 2017).

PIL has revolutionized the concept of justice, ensuring it is not a privilege of a few but a right of all. It has empowered the common citizen, institutionalized empathy in the justice system, and made the judiciary an active agent of social change. Through PIL, the courts have not just interpreted the law but also woven it with the threads of social consciousness and constitutional morality.

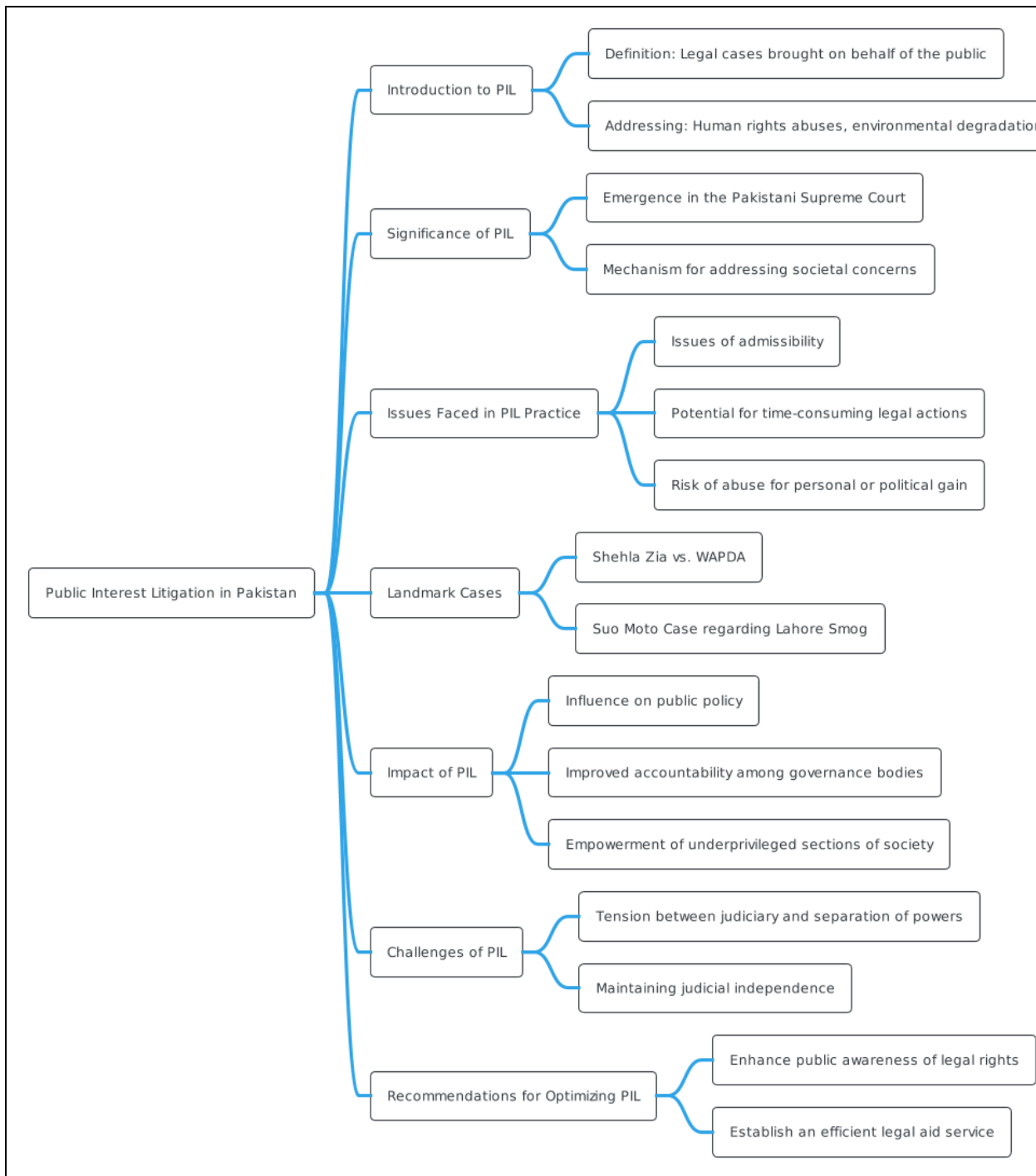


Figure 2: Overview of Public Interest Litigation in Pakistan

Source: Author constructed based on survey of previous documents

5. Evaluation of PIL

Public Interest Litigation (PIL) has exerted a substantial influence on various societies, including Pakistan, and encompasses a multitude of advantages as well as potential obstacles.

5.1 Benefits

Undoubtedly, Public Interest Litigation (PIL) confers numerous advantages within the context of Pakistan. In order to provide a more comprehensive analysis, it is necessary to delve into the details of each aspect.

The empowerment of marginalized communities is facilitated through Public Interest Litigations (PILs), which serve as a platform for these communities to assert and safeguard their rights. The aforementioned legal

proceedings have contested discriminatory practices, policies, and legislation, consequently promoting marginalized populations' social and economic rights. It encompasses various concerns about the availability of educational opportunities, healthcare services, housing accessibility, and equitable remuneration, among other pertinent aspects (Ali & Aziz-ur-Rehman, 2020a).

Promoting civil society activism is greatly enhanced through the utilization of Public Interest Litigations (PILs) in Pakistan. This mechanism facilitates the engagement of non-governmental organizations (NGOs), activists, and other members of civil society in public affairs, as it offers them a platform to raise social concerns within the judicial system. Public Interest Litigation (PILs) also enhances public consciousness regarding significant matters, cultivating a climate of civic engagement and societal accountability (Ali & Aziz-ur-Rehman, 2020b).

Public Interest Litigations (PILs) serve as a mechanism to rectify legal and policy framework deficiencies, particularly in cases where the current legislation or its implementation is insufficient. (PIL) has the potential to instigate policy modifications and play a significant role in the development of legal principles through the process of judicial interpretation and guidance. For instance, (PILs) have resulted in noteworthy rulings about environmental safeguards and consumer entitlements within the jurisdiction of Pakistan.

Public Interest Litigations (PILs) are a mechanism to ensure accountability and oversight over the executive and legislative branches of government. One of the key roles of public authorities is to ensure accountability, thereby mitigating the risks associated with power abuse, corruption, and arbitrary decision-making (PILs) have fostered transparency and promoted effective governance in Pakistan (Abeyratne, 2021).

The initiation of Public Interest Litigations (PILs) has been instrumental in fostering increased judicial activism, wherein courts have assumed a proactive stance in addressing matters about public interest. Consequently, there has been a progression in the interpretations of constitutional and legal provisions in Pakistan, resulting in broadening the ambit of fundamental rights.

Although Public Interest Litigations (PILs) provide substantial advantages, it is crucial to approach and handle them with caution to prevent potential disadvantages such as exceeding the judiciary's jurisdiction or misusing the PIL mechanism.

5.2 Critiques and Limitations of Public Interest Litigation (PIL)

Critics contend that the increasing prevalence of (PIL) and the practice of judicial activism have the potential to lead to the judiciary exceeding its prescribed constitutional authority. The encroachment of courts into the executive and legislative branches' jurisdictions could disrupt the equilibrium of power.

Risk of Misuse There is a potentiality for the misuse of public interest litigation (PIL) to serve personal or political objectives. Frivolous or vexatious Public Interest Litigations (PILs) have the potential to impose excessive burdens on the judicial system and redirect valuable resources away from other significant cases.

Insufficient Execution Despite the issuance of judgments by courts in Public Interest Litigation (PIL) cases, the execution of these orders often presents a formidable obstacle. Public International Law (PIL) 's impact may be constrained without robust enforcement mechanisms.

Limitations in Addressing Structural Issues Although Public Interest Litigation (PIL) can address discrete cases of injustice, its effectiveness may need to be improved in addressing underlying and systemic societal issues. These frequently necessitate extensive policies and legislation modifications and a more expansive societal movement aimed at instigating change.

Insufficient Provision of Legal Aid and Limited Awareness: Despite the accessibility of (PILs) in broadening court access to a more diverse population, there persists a dearth of legal aid services and a lack of awareness regarding the mechanisms associated with PILs. Consequently, many individuals who could potentially derive advantages from Public Interest Litigation (PIL) may need help obtaining access to it.

It can be asserted that (PIL) is a potent instrument for advancing principles of justice and safeguarding the welfare of the general public. Nevertheless, this approach must be employed with discretion and with additional strategies such as well-crafted legislation, comprehensive social awareness initiatives, and meaningful policy reforms to achieve optimal efficacy. Furthermore, it is imperative to consistently exert endeavors to alleviate the potential for misuse and address the inherent limitations.

6. Case Studies: PIL in Action

This section reviews several cases from diverse jurisdictions to illustrate PIL's impact on social change, its use in

defense of marginalized communities, and the potential pitfalls of its misuse. Several instances illustrate the substantial impact of Public Interest Litigation (PIL) in effecting societal transformation and safeguarding marginalized populations in Pakistan. Simultaneously, there have been occurrences wherein Public Interest Litigation (PIL) has been subject to misuse. Let us examine a few illustrations:

6.1 Shehla Zia vs. WAPDA (1994)

The legal dispute between Shehla Zia and WAPDA (Water and Power Development Authority) in 1994 is widely recognized as a significant environmental Public Interest Litigation (PIL) in Pakistan (*Shehla Zia v. Wapda Pld*, 1994). This case represents a pivotal moment in developing environmental jurisprudence within the nation.

In the present instance, a group of individuals, including Shehla Zia, who were inhabitants of Islamabad, lodged a formal plea before the Supreme Court of Pakistan, contesting the erection of a grid station within a residential locality. The individuals expressed apprehension regarding the possible health risks associated with the electromagnetic fields emitted by the grid station. The petitioners contended that the electromagnetic fields have the potential to present significant hazards to the health and welfare of the inhabitants, encompassing potential risks of cancer and other ailments.

In response, the court was compelled to interpret the constitutional provision pertaining to the right to life as enshrined in Article 9 of the Constitution of Pakistan. According to the article, individuals cannot be deprived of their life or freedom unless it is done in accordance with the law. In this significant judicial decision, the Supreme Court adopted a broad interpretation of the "right to life" by encompassing the entitlement to a clean and healthful environment. The court ruled that any potential harm to the residents' health caused by the grid station would constitute a violation of the right to life.

In this case, the interpretation rendered by the Supreme Court was groundbreaking and established a precedent for subsequent environmental justice cases in Pakistan. By incorporating the right to a clean and healthy environment within the purview of the right to life, the court effectively established the possibility of addressing and averting environmental hazards through Public Interest Litigations (PILs).

Additionally, the court emphasized the significance of the "precautionary principle" about environmental issues. The ruling established that in cases where there is a possibility of significant harm to the environment or human health, the absence of complete scientific certainty should not justify delaying the implementation of economically viable measures aimed at averting environmental deterioration.

The legal dispute between Shehla Zia and WAPDA served as a significant precedent in the context of environmental justice within Pakistan, shedding light on the significance of Public Interest Litigation (PIL) in safeguarding environmental rights and advancing the cause of sustainable development.

6.2 Sua Moto Case on the Lahore Smog (2017)

The Sua Moto Case concerning the Lahore Smog in 2017 is a noteworthy illustration of judicial activism and the proactive involvement of the court in safeguarding the environment in Pakistan.

In November 2017, the city of Lahore experienced a significant smog crisis, resulting in the degradation of air quality to hazardous levels. The scenario above has elicited noteworthy public health apprehensions owing to the concomitant hazards of respiratory ailments, cardiovascular disorders, and other health complications linked to substandard air quality.

In light of the prevailing public health crisis, the Lahore High Court proactively initiated suo moto proceedings to address Lahore's deteriorating air quality conditions. The ability of the courts in Pakistan to exercise suo moto notice is a significant facet of judicial activism, granting them the authority to commence legal proceedings in cases of public significance.

After a thorough analysis, the Lahore High Court determined that the government had formulated a "Smog Policy" to manage and alleviate the consequences of smog and air pollution. However, it was observed that the implementation of this policy needed to be improved in effectiveness. The court has issued a mandate to the provincial government, directing them to rigorously enforce the Smog Policy, adopt proactive measures to mitigate air pollution and enhance the enforcement of environmental protection laws.

The court additionally instructed the government to enhance air quality monitoring, raise public consciousness regarding the detrimental health effects of smog, and formulate comprehensive strategies to address air pollution over an extended period.

This case exemplified the judiciary's crucial role in safeguarding the environment through Public Interest Litigation

(PIL). The proactive intervention of the Lahore High Court highlights the judiciary's dedication to safeguarding the right to a clean and healthy environment. This right was previously acknowledged in the significant *Shehla Zia vs. WAPDA* case.

Using the *suo moto* mechanism, the court effectively intervened promptly amidst a public health crisis, thereby ensuring governmental accountability for its obligations and facilitating the progression of environmental safeguard measures. The significance of judicial oversight in guaranteeing efficient environmental governance and safeguarding public health was emphasized.

6.3 *Suo Moto* Case on the Protection of Minorities' Rights (2014)

The *Suo Moto* Case concerning the Protection of Minorities' Rights in 2014 represents a noteworthy development in the realm of Public Interest Litigation (PIL) in Pakistan, particularly in safeguarding the rights of religious minorities.

The case commenced when the Supreme Court of Pakistan exercised *suo moto* jurisdiction in response to a terrorist attack on a church in Peshawar in 2013, resulting in the loss of over 100 lives. The occurrence elicited widespread public indignation and prompted substantial inquiries into the state's obligation to safeguard marginalized populations.

In response, the Supreme Court issued a series of directives aimed at safeguarding the rights of minority groups and fostering an atmosphere of religious tolerance. In this case, the Supreme Court's ruling was predicated upon an analysis of constitutional provisions about safeguarding minority rights, religious liberties, and the principle of equality.

The primary directives of the Supreme Court encompassed

The establishment of a specialized police force tasked with safeguarding the places of worship belonging to minority communities was mandated by the Supreme Court. The primary objective of this measure was to safeguard the well-being and protection of minority communities while concurrently mitigating the risk of potential assaults targeting religious establishments.

The judiciary has issued a directive to the government, mandating the formulation of a comprehensive national policy to foster and advance religious tolerance within the country. The primary objective of this initiative was to cultivate an environment that promotes mutual respect and comprehension among diverse religious factions while concurrently mitigating religious bias and aggression.

The court issued a directive to law enforcement agencies and the government, urging them to implement robust measures to safeguard minority groups from acts of violence and discriminatory treatment. The primary objective of this initiative was to guarantee the preservation of the fundamental rights of minority communities, encompassing the rights to life, liberty, dignity, and equal protection under the law.

The court additionally mandated the modification of educational curricula to foster religious tolerance. The primary objective of this initiative was to cultivate a sense of mutual respect and comprehension among diverse religious communities starting from a young age.

This particular legal case serves as a prime example of the proactive role that the judiciary can assume in safeguarding the rights of marginalized communities and advancing social justice, primarily through the utilization of Public Interest Litigation (PIL). It exemplifies the judiciary's ability to exercise its constitutional authority to enforce governmental responsibility and safeguard the fundamental rights of all individuals, regardless of their religious affiliations.

6.4 *Asia Bibi vs. The State* (2010)

The *Asia Bibi vs. The State* case is a notable illustration of the efficacy of Public Interest Litigation (PIL) in safeguarding human rights and confronting the improper application of legal statutes.

Asia Bibi, a female adherent of the Christian faith hailing from Pakistan, was subjected to a legal conviction for the offense of blasphemy by a court within the Pakistani jurisdiction in the year 2010. This verdict was rendered after an incident in 2009, wherein she was accused of uttering derogatory statements concerning the esteemed figure of the Prophet Mohammed. The incident above transpired within a dispute between Bibi and her colleagues, who adhered to the Islamic faith. After being found guilty, she received a death sentence, which sparked widespread international condemnation and drew global scrutiny to the stringent blasphemy laws in Pakistan.

The legal proceedings endured for an extended period due to the submission of appeals to superior courts. The Supreme Court of Pakistan, in October 2018, rendered a verdict of acquittal for Asia Bibi on the grounds of

insufficient evidence and inconsistencies in the testimonies provided by the witnesses. In their ruling, the judges observed that the prosecution had not successfully demonstrated its case beyond a reasonable doubt. The judgment further emphasized the importance of considering the notion of reasonable doubt about enforcing blasphemy laws, as the potential misuse of such laws may lead to a miscarriage of justice.

International human rights organizations widely hailed the Supreme Court's ruling as a notable victory for protecting religious freedom and a setback for religious extremism and intolerance. Nevertheless, the acquittal of Asia Bibi incited fervent demonstrations by religious extremists in Pakistan, ultimately compelling her to seek refuge in Canada to ensure her security.

The Asia Bibi case highlights the significant importance of the judiciary and Public Interest Litigation (PIL) in safeguarding the principles of the rule of law, safeguarding human rights, and addressing the inappropriate application of legislation. This statement emphasizes the potential of Public Interest Litigation (PIL) in challenging unjust laws and practices while emphasizing the judiciary's bravery and autonomy in rendering decisions that prioritize justice and equity, even when confronted with substantial societal and political influence.

6.5 Potential Misuse of PIL

Undoubtedly, Public Interest Litigation (PIL) functions as a formidable mechanism for fostering social justice, enhancing the accessibility of justice, and promoting the progression of human rights. However, it is essential to acknowledge that PIL is not exempt from the possibility of exploitation. While it may be deemed inappropriate to delve into specific instances due to the sensitivity surrounding the topic, addressing the overarching characteristics of these misuses is crucial.

The development of Public Interest Litigation (PIL) emerged as a legal mechanism to facilitate the provision of justice to marginalized communities, address issues of public significance, and foster societal transformation. Nevertheless, the potential for misuse of this system arises due to the permissive nature of its standing rules, which enable individuals from various backgrounds to initiate legal proceedings in the pursuit of public interest. The scenario above can be utilized to pursue personal vendettas, individual interests, or political agendas while presenting oneself as acting in the public's best interest.

There exist several potential avenues for the misuse of PIL, which can be broadly categorized as follows:

Personal Vendettas and Political Agendas: Individuals may initiate Public Interest Litigations (PILs) to settle grievances or advance their political motives. These cases do not truly serve the public interest but rather present themselves as such to take advantage of the adaptable nature of Public Interest Litigation (PIL).

Public Interest Litigation (PIL) can be employed as a method of harassment or intimidation whereby individuals, corporations, or governmental entities may be coerced into litigation proceedings lacking a legitimate public cause. The potential impact of frivolous or malicious Public Interest Litigations (PILs) on the already substantial workload of the judiciary may result in the postponement of justice for legitimate cases.

The potential for judicial overreach is a concern raised by specific individuals who contend that the extensive utilization of Public Interest Litigation (PIL) may result in courts encroaching upon the jurisdictions of the legislative and executive branches of government, consequently disrupting the intricate equilibrium of power.

In light of these potential challenges, it is imperative to implement protective measures and mechanisms that can effectively discern and eliminate PILs that are either trivial or malevolent. One potential approach to address the issue involves implementing more rigorous evaluation procedures during Public Interest Litigations (PILs) admission and punitive measures against individuals misusing PILs. Implementing routine judicial training can also contribute to developing judges' awareness in identifying potential instances of misuse.

Although there is a risk of misuse, it is undeniable that Public Interest Litigation (PIL) offers significant advantages in improving access to justice, empowering marginalized communities, and fostering the principles of the rule of law and democracy. Hence, it is imperative to prioritize mitigating its potential for misuse rather than imposing limitations on this potent tool of justice.

7. Discussion

This discussion aims to examine the progression, efficacy, and obstacles associated with Public Interest Litigation (PIL) in Pakistan.

Public Interest Litigation (PIL) has been instrumental in promoting the public interest, protecting individual rights, and influencing legal precedents within the legal system of Pakistan. Several noteworthy cases, such as the Shehla Zia vs. WAPDA case in 1994, established a significant legal precedent in environmental justice. Another notable

instance is the *Suo Moto* case on the Lahore Smog in 2017, which underscored the proactive involvement of the judiciary in safeguarding the environment. Additionally, the *Suo Moto* case on the Protection of Minorities' Rights in 2014 strengthened marginalized communities' legal protection. The exoneration of Asia Bibi in 2010 further underscored the potential of Public Interest Litigation (PIL) to combat the improper application of laws and safeguard human rights.

Public Interest Litigation (PIL) 's effectiveness in addressing social justice issues, promoting accountability, and safeguarding the public interest within the context of Pakistan is significant. PIL (Public Interest Litigation) has significantly shifted away from conventional litigation focused on individual interests and instead embraced collective redress mechanisms. The advancement of technology has facilitated the democratization of justice, enabling individuals from marginalized and underprivileged sectors of society to exercise their rights. Implementing this system has facilitated the establishment of accountability by allowing the judiciary to thoroughly examine and rectify instances of administrative misconduct and infringements upon constitutional and statutory entitlements.

Nevertheless, the field of Public International Law (PIL) is faced with numerous challenges and limitations. The issue of judicial overreach presents a substantial obstacle, as it can disrupt the equilibrium of powers among the judiciary, executive, and legislative branches. Public Interest Litigation (PIL) has the potential to be exploited for individual or partisan purposes, thereby jeopardizing the integrity of the legal system and its adherence to the principles of justice and fairness.

One of the key obstacles encountered by Public Interest Litigation (PIL) in Pakistan pertains to the restricted level of awareness and comprehension among the general populace concerning their legal entitlements and the prospective advantages associated with PIL. Access to information is necessary for the complete utilization of PIL. In order to optimize the efficacy and influence of Public Interest Litigation (PIL), it is crucial to tackle the challenges above. Achieving a delicate equilibrium between judicial activism and restraint is imperative to mitigate the risk of excessive judicial overreach. In order to mitigate potential misuse, it is imperative to enhance the transparency and accountability of the PIL process. Furthermore, it is imperative to enhance legal literacy within the nation. The level of engagement can be enhanced by disseminating information to the general public regarding their legal entitlements and the advantages associated with Public Interest Litigation (PIL).

Despite encountering various obstacles and constraints, Public Interest Litigation (PIL) has exhibited substantial effectiveness in promoting the welfare of the general public, protecting individual entitlements, and influencing legal precedents within the context of Pakistan. By effectively addressing these challenges, the efficacy and influence of Public Interest Litigation (PIL) can be substantially augmented, thereby ensuring its ongoing contribution to advancing social justice and accountability.

The subject of Public Interest Litigation (PIL) in Pakistan has garnered significant attention from both academic and public spheres due to its evolution, effectiveness, and associated challenges. Public Interest Litigation (PIL) has emerged as a significant catalyst in the legal framework of Pakistan, playing a pivotal role in promoting the welfare of the general public, protecting individual rights, and influencing the establishment of legal precedents.

Numerous noteworthy examples exemplify the potential and efficacy of Public Interest Litigation (PIL). The *Shehla Zia vs. WAPDA* case in 1994 and the *Suo Moto* case on Lahore Smog in 2017 exemplify the judiciary's capacity to reinterpret constitutional rights in order to protect public health and interests, as well as its proactive involvement in the enforcement of environmental policies, respectively.

Additionally, the *Suo Moto* Case on the Protection of Minorities' Rights in 2014 served as a notable example of how Public Interest Litigation (PIL) can effectively contribute to advancing social justice and safeguarding marginalized communities. This case underscored the significance of PIL in confronting discriminatory practices and advocating for inclusivity. Moreover, the case of *Asia Bibi vs. The State* (2010) brought attention to the potential of Public Interest Litigation (PIL) in addressing the improper use of laws, promoting equity in enforcing legal principles, and safeguarding human rights.

Nevertheless, notwithstanding the considerable progress made, implementing Public Interest Litigation (PIL) in Pakistan is challenging. The factors above encompass the potential for judicial overreach, the possibility of PIL being misused for personal or political purposes and the prevailing lack of public awareness regarding PIL. The challenges above can impede the effectiveness and potential impact of public interest litigation (PIL) and necessitate attention to augment its overall efficacy.

Maintaining the separation of powers necessitates a delicate equilibrium between judicial activism and restraint to mitigate the risk of excessive judicial overreach. Likewise, implementing more stringent standards for the

acceptance of Public Interest Litigations (PILs) and establishing thorough examination processes can aid in reducing the potential for abuse. Furthermore, it is crucial to enhance public awareness regarding Public Interest Litigation (PIL) and promote legal literacy to empower individuals and communities to utilize PIL to seek redress effectively.

In summary, despite encountering various obstacles and constraints, Public Interest Litigation (PIL) has exhibited substantial effectiveness in promoting the welfare of the general public, protecting individual rights, and influencing legal precedents within the context of Pakistan. Therefore, by effectively tackling these challenges and harnessing the potential of PIL, its efficacy and influence can be significantly augmented. It will guarantee that Public Interest Litigation (PIL) continues to fulfill a crucial function in advancing social justice, cultivating accountability, and protecting the welfare of the general public.

8. Recommendations for Enhancing the Effectiveness of PIL

The following suggestions aim to improve the efficacy of Public Interest Litigation (PIL) in Pakistan:

- The delicate equilibrium between judicial activism and restraint is crucial. While judicial activism has addressed significant social concerns through Public Interest Litigation (PIL), it is equally imperative for the judiciary to exercise restraint to prevent exceeding its authority and to uphold the principle of separation of powers as stipulated by the constitution.
- Implementing mechanisms to enhance transparency and accountability in the PIL process can effectively cultivate public trust and ensure decisions genuinely serve the public's best interests. This can include meticulous record-keeping of proceedings, comprehensive explanations of decisions, and a willingness to undergo public scrutiny.
- Preventing the misuse of PIL requires a thorough examination of cases during admission to deter potential abuse. Establishing more stringent criteria and implementing guidelines to identify and address frivolous or malicious PILs can enhance the process.
- There is a need to enhance public awareness regarding PIL, particularly within marginalized communities, to promote legal literacy. Legal literacy empowers individuals by equipping them with an understanding of their rights and the means to enforce them within the legal framework.
- Enhancing legal aid services is essential to ensure sufficient legal representation for individuals pursuing PILs, especially those from marginalized communities. Allocating additional financial resources towards legal aid programs and providing comprehensive training opportunities for legal aid lawyers are potential solutions.
- Promoting research on the impact and effectiveness of PILs can yield valuable insights for enhancing their refinement. This academic approach includes utilizing case studies, conducting impact assessments, and analyzing potential enhancements.
- Implementing these recommendations can significantly improve the efficacy of PIL in promoting social justice, safeguarding human rights, and upholding the public interest in Pakistan.

9. Conclusion

Public Interest Litigation (PIL) represents a significant and transformative advancement within Pakistan's legal framework. It democratizes access to justice by moving beyond conventional individual litigation to elevate public and marginalized community concerns within judicial discourse. PIL has empowered the judiciary to address matters of public importance, leading to significant legal decisions that bolster constitutional and statutory rights, promote social justice, and improve governance. The judiciary's proactive role in safeguarding public rights has fostered the development of judicial activism. However, PIL presents specific challenges and the potential for misuse. Critiques of judicial overreach, concerns about the disruption of the separation of powers, and instances of misuse for personal or political gains underscore the need for adequate safeguards and accountability mechanisms. Despite these challenges, PIL holds significant potential as a catalyst for social change and a tool for promoting justice and equality. To optimize its benefits and mitigate its drawbacks, it is imperative to enhance the implementation and methodologies of PIL. The future of PIL in Pakistan depends on achieving a harmonious balance between judicial activism and judicial restraint, augmenting transparency and accountability mechanisms, curbing potential misuse, fostering legal literacy, and fortifying legal representation. By implementing these measures, PIL can continue to significantly advance social justice, safeguard human rights, and serve the public interest in Pakistan.

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