JUDGMENT SHEET

IN THE ISLAMABAD HIGH COURT, ISLAMABAD

W.P. NO. 1801 OF 2020

ISKANDAR M. KHAN

VS

CHAIRMAN, PAKISTAN STANDARDS AND QUALITY CONTROL AUTHORITY, ISLAMABAD AND ANOTHER

Petitioner by	**:**	**Ms. Safeena Sarfraz, Advocate along with Petitioner.**
Respondents by	**:**	**Raja M. Saeed, Deputy Attorney General.** **Raja Zamir ud Din Ahmed, Assistant Attorney General.** **Rana Fida Hussain, Director for Respondent No.1.** **Mr. Imran Haider Sial, Law Officer for Respondent No. 2.**
Date of hearing	**:**	**04.02.2026**

MUHAMMAD AZAM KHAN, J.

1. Through the instant Petition under Article 199 of the Constitution of the Islamic Republic of Pakistan, 1973, the Petitioner [Chairman, Pakistan Polypropylene Woven Sack Manufacturers Association], seeks the following relief:

(I) Issuance of writ in the nature of *mandamus:*-

(i) directing the Respondents [Federation of Pakistan through the Secretary, Ministry of National Food Security & Research, and the Pakistan Standards and Quality Control Authority (PSQCA), to immediately, effectively, and completely enforce the mandatory Statutory Regulatory Orders (SROs) S.R.O. 117(KE)/2016 [PS: 4877] dated 09.09.2016, and S.R.O. 46(KE)/1017 [PS: 3128] dated 19.05.2017, specifically the latter which mandate the use of food-grade packaging for food items specifically the wheat flour;

(ii) Directing the Respondents to take punitive and corrective action against all manufacturers, distributors, and users of non-compliant, inferior polypropylene woven sacks and recycled cement paper bags for the packaging of food commodities, as such practices violate the aforesaid SROs and fundamental rights. and

(II) Declare that the continued inaction and failure of the public functionaries to implement the said SROs has resulted in massive economic wastage of national food resources and has endangered public health, thus violating the fundamental rights of the citizens as guaranteed under Articles 9 (security of person), 14 (inviolability of dignity), and 38 (promotion of social and economic well-being) of the Constitution of the Islamic Republic of Pakistan, 1973.

2. That the Pakistan Standards and Quality Control Authority (PSQCA), in exercise of its statutory mandate, issued two above said critical SROs. These SROs mandate the exclusive use of food-grade packaging materials for wheat flour and other food items to ensure safety and prevent wastage. The Supreme Court of Pakistan has previously taken note of and approved these notifications. That despite the passage of over eight years since their issuance, the said mandatory regulations have not been implemented by the concerned authorities, i.e. Respondents. According to the Petitioner due to this non-enforcement, the national food supply chain is plagued by the use of two types of highly detrimental packaging (i) Inferior Polypropylene Woven Sacks**:** Made from recycled plastic waste and adulterated with high levels of calcium carbonate, these sacks are porous and prone to bursting. This results in a staggering wastage of 3% to 5% of packed wheat flour during handling and transport, translating into an annual financial loss of approximately Rs. 23 to Rs. 38 billion, based on an estimated 15.36 million tons of wheat flour being packed in such substandard sacks. (ii) Recycled Cement Paper Bags: In blatant violation of World Health Organization (WHO) guidelines and the specific directives of the National Institute of Health (NIH), carcinogenic used kraft paper cement bags, which are disallowed even for cement packaging, are routinely used to pack wheat flour, sugar, and rice. This poses a severe, direct threat to public health. That the Petitioner Association has consistently strived and made representations,

including to the Prime Minister, for the implementation of these SROs but to no avail, forcing it to invoke the Constitutional jurisdiction of this Court.

3. The learned counsel for the Petitioner contended that the Respondents' inaction is causing a catastrophic and quantifiable economic loss to the national exchequer. The use of non-food-grade polypropylene sacks leads to a wastage of 3-5% of packed flour, while the mandated food-grade laminated sacks would reduce this wastage to a mere 0.05%. The continued failure to enforce the law since May 2017 has cumulatively squandered tens of billions of rupees worth of essential foodstuffs, which is an affront to the economic security of the state and a dereliction of the Respondents' statutory and public duty. Enforcing the SROs would also result in significant foreign exchange savings. Substituting the currently used imported paper bags with locally producible food-grade polypropylene bags would save approximately US$ 42.3 million annually in the import bill, bolstering the national economy. The learned counsel emphasized that the use of recycled and carcinogenic packaging materials for food constitutes a clear and present danger to the health and life of the citizens, violating their fundamental right to life and dignity under Articles 9 and 14 of the Constitution. The WHO data underscores that unsafe food causes hundreds of diseases, from diarrhea to cancers, claiming hundreds of thousands of lives globally each year. The learned counsel further contended that the Respondents are facilitating the contamination of the national food supply with chemical substances, heavy metals, and pathogens by allowing the use of packaging made from industrial waste and recycled materials. This is in complete negation of Pakistan's international commitments and the WHO's imperative that governments prioritize food safety as a public health priority. Moreover, the SROs PS: 4877 and PS: 3128 are valid, binding laws that have already received judicial notice. The executive's failure to implement its own promulgated regulations is arbitrary, unreasonable, and amounts to maladministration. This Court's intervention is necessary to compel the performance of a public legal duty which has been ignored for years, causing ongoing and irreparable harm to the nation's food security and public health. The learned counsel lastly contended that the Petitioner has exhausted all other avenues for redressal. The continued impunity with which harmful packaging is used demonstrates a systemic failure of

governance that only this Court can now remedy through the issuance of appropriate writs.

4. The learned Deputy Attorney General and the learned Assistant Attorney General filed reply on behalf of the Respondent No. 1 and submitted that the PSQCA is a creature of statute, established under the PSQCA Act, 1996, and its powers and responsibilities are strictly circumscribed by this law and the notifications issued thereunder. The Federal Government, in its wisdom, has declared a specific list of 105 items as mandatory under the PSQCA's Compulsory Certification Marks Scheme, and the Authority's enforcement and monitoring jurisdiction is explicitly limited to these 105 items. It is an admitted and undisputed fact that "Wheat Flour and Fortified Flour (Atta)" are not included in the said mandatory items list. Therefore, regardless of the merits of the Petitioner's concerns regarding packaging, the PSQCA lacks the vires/legal authority to directly regulate flour millers or prohibit them from using any specific type of sack, and the Petitioner is, in essence, seeking relief against entities over which this Respondent has no statutory control. Contrary to the allegations of inaction, the PSQCA has proactively discharged its duties within its legal domain concerning the relevant SROs. Regarding SRO PS: 3128-2017 (Food-Grade Sacks), the Authority has undertaken the core regulatory function of licensing and certifying manufacturers, having issued a total of 64 licenses across all four provinces to manufacturers of polypropylene woven sacks, thereby ensuring that a compliant supply exists in the market as per the Pakistan Standard. Regarding awareness and communication, the PSQCA has not remained silent, as it has published public notices in leading national newspapers to educate stakeholders and the public about the proper usage of polypropylene bags, and more significantly, has written directly to the Provincial Governments and Chief Secretaries on multiple occasions, bringing the SRO to their notice for compliance and enforcement at the provincial level, where the jurisdiction over flour lies. The fruits of this communication are evident, as the Government of Sindh subsequently issued directives to its Commissioners, Deputy Commissioners, and Provincial Food Authority for enforcement, which demonstrates that the PSQCA has effectively performed its role as a standard-setting and advisory federal body, prompting action from the relevant provincial

authorities. Furthermore, a critical distinction exists between regulating the manufacturer and the end-user. The PSQCA's mandate regarding PS: 3128 is to regulate the manufacturers of the sacks to ensure they produce items conforming to the food-grade standard, which the Respondent has done through its licensing scheme. However, the mandate to regulate the end-user, namely the flour mill, and to compel it to use only certified sacks, falls outside the PSQCA's ambit when the end-product, wheat flour, is not a mandatory item, and the enforcement of packaging rules for non-mandatory items at the point of use rests with the concerned provincial food authorities and other relevant departments. Consequently, the Petitioner has impleaded the wrong entity for the desired remedy, as the PSQCA cannot be directed to perform a function the law does not assign to it, and the prayer against this Respondent is therefore misplaced. The appropriate authorities to implement the packaging rules for wheat flour are the Provincial Food Departments and their respective Food Authorities, which operate under provincial laws, while the Federal Ministry of National Food Security may also have a coordinating or advisory role in this regard. In light of the foregoing, it is most respectfully prayed that this Court may kindly be pleased to hold that the PSQCA has acted within its statutory mandate by promulgating the standard, licensing compliant manufacturers, and communicating with provincial authorities for enforcement; declare that the direct regulation of wheat flour manufacturers regarding packaging falls outside the jurisdiction of Respondent No. 1, as wheat flour is not a mandatory item under the PSQCA Act; consequently, direct the Petitioner's grievance and this Court's orders towards the competent authorities, namely the Provincial Governments, Food Authorities, and Respondent No. 2, for ensuring the use of PSQCA-certified food-grade polypropylene sacks in the wheat flour industry; and discharge Respondent No. 1/PSQCA from any liability or directive that would require it to act ultra vires its governing statute. Justice demands that a statutory body be held accountable only for the duties the law has entrusted to it, and the PSQCA has fulfilled its part, while the enforcement gap lies elsewhere in the federation-province nexus of food control.

5. The learned law officer for Respondent No. 2 submitted that the Writ Petition, insofar as it seeks to enforce packaging standards against wheat flour

manufacturers, is fundamentally misdirected against this Federal Ministry. The Ministry's role is strictly defined by functional and constitutional divisions of responsibility, and it lacks the legal authority to grant the Petitioner the relief sought due to the reasons, firstly, that the functional jurisdiction of Respondent No. 2 is limited to the macro-management of wheat and not the micro-regulation of flour milling. The core mandate of the Ministry, as outlined in the Rules of Business, pertains to national strategic policy and reserves of wheat, which involves evaluating country-wide demand and supply, managing the import and export of wheat grain to maintain food security, and coordinating with provinces on broader agricultural policy. The Ministry's operational involvement ends with the public release of wheat grain to the Provincial Food Departments. The subsequent processes, milling this grain into flour, the packaging of that flour, its storage by private mills, and its distribution to retailers and consumers, are entirely post-harvest, industrial, and commercial activities that fall outside this Ministry's functional domain. Consequently, the Ministry is not, and cannot be, a regulator of Pakistan's numerous private flour mills. Secondly, flour production and packaging are unequivocally a provincial subject under the Constitutional scheme. The control, regulation, and day-to-day oversight of food commodities after they enter the provincial supply chain are matters of provincial governance. The production, packaging, and sale of wheat flour occur within provincial territories and are governed by provincial laws and authorities, such as the Punjab Food Authority, Sindh Food Authority, and their equivalents in Khyber Pakhtunkhwa and Balochistan. Directing a Federal Ministry to enforce a packaging standard on provincial entities and private actors within provinces would violate the spirit of the 18th Amendment and the principles of cooperative federalism. The Petitioner must instead seek recourse from the relevant provincial food authorities, who possess the requisite enforcement machinery, including inspectors and the power to seal premises and impose penalties on non-compliant flour mills. Third, there is a clear division of regulatory responsibilities, and food safety and standardization are not within this Ministry's purview. The Petitioner's grievance pertains to food safety standards and packaging specifications, which are specialized regulatory functions assigned to distinct statutory bodies. As correctly identified by Respondent No. 1, the

mandate to set national standards, such as PS: 3128, lies with the Pakistan Standards and Quality Control Authority (PSQCA), which operates under the Ministry of Science and Technology. Similarly, the mandate to enforce these safety standards at the point of production, packaging, and sale lies with the Provincial Food Authorities established under respective provincial acts. Respondent No. 2 is neither a standard-setting nor a standards-enforcing agency; it acts as a link in the policy chain concerning the commodity (wheat), not the processed retail product (packaged flour). To burden this Ministry with a mandate it does not possess would render the specialized regulatory framework created by Parliament and Provincial Assemblies redundant. Fourth, there is a clear case of misjoinder, and the proper course of action lies elsewhere. The impleadment of the MNFS&R as a necessary party for the enforcement of packaging standards is based on a misunderstanding of governmental functions, as the Ministry has no operational lever to command a flour mill in Lahore or Sukkur to change its packaging. The Petitioner's legitimate objective, ensuring the use of food-grade sacks, can only be achieved through orders directed at the actual regulators, the Provincial Food Authorities (for enforcement on mills) and the PSQCA (for ensuring the integrity of the certification scheme for sack manufacturers). The Federation, through the Cabinet Division or the Council of Common Interests, may have a role in facilitating inter-provincial coordination, but not direct enforcement. In view of the foregoing, it is prayed that this Court may kindly be pleased to hold that the Ministry of National Food Security and Research (Respondent No. 2) is not the appropriate or competent authority to regulate the packaging practices of wheat flour mills, as this falls within the exclusive operational jurisdiction of provincial governments; declare that the relief sought by the Petitioner regarding enforcement of packaging standards cannot be granted against Respondent No. 2, as it lacks the statutory power and administrative machinery to execute such an order; (c) discharge Respondent No. 2 from the proceedings, with the observation that the Petitioner may, if so advised, seek to implead the relevant Provincial Food Authorities as necessary parties for the effective adjudication and enforcement of the issues raised in the petition; and direct the Petitioner to approach the concerned provincial forums for the redressal of its grievances regarding on-the-ground implementation. The Petition, while

highlighting a critical issue of public importance, has knocked on the wrong door, as the keys to compliance are held by the provincial food safety regulators, not by the Federal Ministry concerned with grain stocks and national food security policy.

6. In his rejoinder, the learned counsel for the Petitioner asserts that the Respondents' arguments to abdicate responsibility constitute a misreading of the law and a disregard for grave public harm. Addressing Respondent No. 1 (PSQCA), the Petitioner contends that its jurisdictional objection is a disingenuous distortion. The mandatory item is the "polypropylene woven sack for packing and transportation of food items (PS:3128)," not the contents within it. Therefore, any such sack used for food, including wheat flour, must comply. The PSQCA's statutory duty under Sections 8(x) and 15 of the PSQCA Act, 1996, to seize non-compliant articles extends to these sacks wherever found in Pakistan. Its own conduct in writing to Chief Secretaries to enforce this standard for “food items" confirms this understanding and estops it from claiming otherwise.

7. Responding to the "provincial subject" argument of both Respondents, the Petitioner characterizes it as a facade for buck-passing that has created a regulatory vacuum. The legal obligation originates from a Federal SRO under a Federal Act, giving the PSQCA a non-delegable duty to enforce it nationally. Mere letters to provinces do not discharge this duty. The Ministry of National Food Security (Respondent No. 2) cannot evade its mandate for national food security by hiding behind the 18th Amendment, especially when facing a public health emergency and massive economic wastage, Rs. 23-38 billion annually, cumulatively Rs. 80 billion, from preventable flour losses.

8. The catastrophic scale of harm, including health risks from carcinogenic cement bags used for food and significant foreign exchange losses, demonstrates a systemic governance failure. Thus, this Court's intervention under Article 199 is essential to enforce fundamental rights (Articles 9, 14, 24). While the PSQCA is the primary enforcer, the Ministry is a necessary party to leverage its policy role, such as tying wheat procurement to compliant packaging. Accordingly, the Petitioner prays this Court to reject the Respondents' objections and declare their inaction a public rights’ violation.

9. I have heard the learned counsel for the Petitioner, learned DAG as well as learned AAG appearing on behalf of the Respondents and the learned Law Officer appearing on behalf of the Respondent No. 2/Ministry of National Food Security and Research.

10. This petition under Article 199 of the Constitution of the Islamic Republic of Pakistan, 1973, filed by the Chairman of the Pakistan Polypropylene Woven Sack Manufacturers Association, raises grave and alarming questions concerning the enforcement of statutory regulations designed to protect public health and prevent catastrophic economic wastage. The Petitioner seeks to compel the Respondents [the Federation of Pakistan through the Ministry of National Food Security and Research and the Pakistan Standards and Quality Control Authority (PSQCA)] to implement two mandatory Statutory Regulatory Orders (SROs): S.R.O. 117(KE)/2016 [PS: 4877] dated 09.09.2016 and S.R.O. 46(KE)/2017 [PS: 3128] dated 19.05.2017. The Petitioner contends that the non-enforcement of these SROs, which mandate the use of specific, safe packaging for cement and food items respectively, has led to a national scandal involving the annual wastage of wheat flour worth Rs. 23 to Rs. 38 billion and the systemic contamination of the food supply through the use of carcinogenic, recycled packaging, in brazen violation of fundamental rights guaranteed under Articles 9, 14, and 38 of the Constitution.

11. Before delving into the merits, this Court must address the formidable preliminary objections raised by both Respondents, which challenge the very maintainability of this petition against them.

12. The PSQCA asserts it is a creature of the PSQCA Act, 1996, with powers strictly circumscribed to the enforcement of standards for 105 items declared mandatory by the Federal Government. It contends that Wheat Flour and Fortified Flour (Atta) are not on this list. Therefore, while it can regulate the manufacturers of polypropylene sacks under PS: 3128, it lacks the vires to regulate the end-users (flour mills) who choose to pack their product in non-compliant sacks. It argues that it has discharged its duty by licensing 64 sack manufacturers nationwide and writing to Provincial Governments for enforcement, and thus cannot be compelled to act beyond its statutory mandate.

13. The Ministry asserts its role is confined to macro-management of wheat policy, strategic reserves, and inter-provincial coordination. The milling, packaging, and sale of wheat flour are post-harvest, industrial activities falling squarely within provincial jurisdiction under the 18th Amendment. It disclaims any role as a standards-enforcing or food safety agency, pointing to the Provincial Food Authorities and the PSQCA as the designated regulators. It argues that directing a Federal Ministry to regulate provincial actors violates cooperative federalism.

14. This Court has attentively considered these objections. While technically founded on a narrow reading of administrative mandates, they reveal a profound and troubling institutional abdication when viewed against the scale of the public harm alleged and the plain text of the law.

15. The objection is overruled. The PSQCA's interpretation is myopic and defeats the very purpose of the Act. The mandatory item listed at Serial No. 74 of its own schedule is "Polypropylene Woven Sacks for Packing and Transportation of Food Items (PS: 3128)." The regulated commodity is the sack, not its contents. The Act's prohibitive and punitive provisions under Sections 8(x), 15(2)(c)&(d), and 22 are unambiguous. They empower the Authority to "stop manufacture, storage and sale," "seize and detain," and penalize any article that contravenes a Pakistan Standard. The contravention occurs the moment a non-compliant sack, marked or intended for food, is manufactured, stored, sold, or transported. The Act's jurisdiction travels with the contraband article itself, irrespective of whether the end-product (wheat flour) is a mandatory item. The PSQCA's conduct establishes that its mandate under PS: 3128 applies categorically to packing and transportation of food items. Having repeatedly directed provincial authorities on this very subject, the Authority cannot now retreat to a parsing of definitions to exclude wheat flour. To do so would render its prior official actions meaningless and create an artificial, self-serving exemption for a primary food staple and as such its own conduct precludes such an absolution. It cannot now resile from this position. Licensing manufacturers while turning a blind eye to the blatant misuse of the very product it regulates is

a dereliction of its comprehensive statutory duty to ensure conformity with Pakistan Standards.

16. The objection with regard to the Respondent No. 2/Ministry is sustained in part but overruled in its attempt to completely disengage from the issue. It is correct that the Ministry is not a direct, boots-on-the-ground enforcement agency for food safety at flour mills. That task lies with Provincial Food Authorities. However, the Ministry's core mandate is national food security. It cannot credibly claim this mandate while being willfully blind to a documented systemic leak of 3-5% of the national wheat flour supply, a loss valued at tens of billions annually, solely due to faulty packaging. Its role in wheat procurement, pricing, and inter-provincial releases places it at a strategic nexus where it can institute policy levers (e.g., making PSQCA-certified sacks a condition for procurement or release of government wheat) that would compel compliance across the chain. Its posture of total disengagement is incompatible with its duty to safeguard the nation's food resources from colossal, preventable waste.

17. In light of the above, this petition is maintainable. The Petitioner, an association of manufacturers of compliant sacks, has sufficient *locus standi* as its members are directly affected by the illegal market flooded with non-compliant products. More importantly, the petition raises matters of transcendent public importance involving fundamental rights to life, health, and protection from economic deprivation due to state inaction. The core question is not micro-managing flour mills but compelling public functionaries to perform their undeniable legal and constitutional duties to stop a manifest public wrong. The buck-passing between federal and provincial entities has created a regulatory black hole, necessitating this Court's intervention under Article 199.

18. Turning to the merits, the Court notes that the quantifiable data presented by the Petitioner, detailing significant economic wastage and serious health hazards, stands largely unchallenged by the Respondents. The figures, annual losses of Rs. 23-38 billion, cumulative losses exceeding Rs. 80 billion since 2017, and the health risks from carcinogenic cement bags used for food, paint a picture of a national emergency. This is not a mere commercial dispute but a catastrophic failure of governance affecting food security and public health.

19. S.R.O. 117(KE)/2016 and S.R.O. 46(KE)/2017 were lawfully issued under Section 14 of the PSQCA Act. They have the force of law. The state's failure to enforce its own laws for over eight years is the definition of maladministration and arbitrariness. It violates the principle of legality and erodes public trust in the regulatory state.

20. The collective inaction of the state apparatus directly implicates the following fundamental rights:

- Article 9 (Security of Person): The state's failure to prevent the contamination of staple foods with carcinogenic substances from packaging is a direct threat to the life and security of every citizen.

- Article 14 (Inviolability of Dignity): Forcing the populace, especially the poor, to consume food packed in filth-ridden, industrial waste bags is an affront to human dignity.

- Article 38 (Promotion of Social & Economic Welfare): Allowing the squandering of a vital food resource worth billions which could feed millions, is a gross failure to promote the economic well-being of the people.

The state has a positive obligation to protect these rights. Its current posture of institutional paralysis constitutes a breach of that obligation.

21. The Petitioner has made out an irrefutable case. The objections of the Respondents, while highlighting the complexities of federal-provincial governance, cannot justify the continued sacrifice of public health and national wealth on the altar of bureaucratic inertia and jurisdictional technicalities.

22. It is declared that the non-implementation and non-enforcement of the S.R.Os by the concerned state functionaries constitutes a failure to perform a public duty, is arbitrary, unreasonable, and has resulted in the violation of the fundamental rights of the citizens of Pakistan under Articles 9, 14, and 38 of the Constitution.

23. The Respondent No. 1 (PSQCA) shall, within thirty (30) days of this order, launch a nationwide enforcement drive. It shall exercise its powers under Sections 8, 15, and 22 of the PSQCA Act, 1996, to identify, seize, detain, and initiate penal proceedings against the manufacture, storage, sale, and transport of (a) Polypropylene woven sacks marked or intended for packing food items that do not bear the PS Mark certifying conformity with PS: 3128. (b) any kraft paper sacks being used for packing cement that do not conform to PS: 4877, and critically, any such cement sacks found in the supply chain for packing food items. The PSQCA shall not limit its action to manufacturers but shall extend it to distributors, godowns, and transporters found dealing in non-compliant sacks. Its jurisdiction is over the article, not the business license of the end-user. Furthermore, the PSQCA shall submit a comprehensive compliance report to this Court within ninety (90) days from the receipt of copy of this judgment, detailing actions taken, quantities seized, penalties imposed, and the geographical scope of its operations.

24. The Respondent No. 2 (Ministry of National Food Security) shall, within thirty (30) days, convene consultations with the Provincial Food Departments, Provincial Food Authorities and relevant federal regulators, with a view to framing and notifying appropriate policy and administrative measures to ensure that wheat flour produced from government-released wheat is packaged in PSQCA-certified sacks conforming to PS:3128. Such measures may include, where considered appropriate under law, the incorporation of compliance conditions in procurement, release or subsidy frameworks. The Ministry shall place before this Court, within ninety (90) days, a report outlining the measures considered and steps taken in this regard.

25. Both Respondents shall, within forty-five (45) days, convene a meeting with representatives of all Provincial Food Authorities and submit to this Court a Joint Action Plan for coordinated, sustained enforcement. This plan shall include mechanisms for information sharing, joint inspection teams where appropriate, and public awareness campaigns.

26. This case is a stark reminder that laws are not written to gather dust in gazette notifications but to be implemented for the protection of the people. Let copies of this judgment be sent to the Respondents for immediate compliance.

27. The Registrar of this Court is directed to also provide copies of this judgment to the Chief Secretaries and the Chairpersons of the Provincial Food Authorities of Punjab, Sindh, Khyber Pakhtunkhwa, and Balochistan. They are expected to act in aid of this Court's orders and ensure vigorous enforcement within their respective jurisdictions.

28. The Petition is **allowed** in the above terms.

(MUHAMMAD AZAM KHAN)
JUDGE

Approved for Reporting
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