
Strengthening the War on Drugs: A Jurisprudential Analysis of Acquittals in Narcotics Cases in Pakistan

Sardar Jamshed Ahmad Khan

Advocate High Court, LLB Hons

Email: rebels.youth@gmail.com

Rabia Zafar

Lecturer Bahria University Islamabad, LLM

Email: Rabiazafar.buic@bahria.edu.pk

Muhammad Usman Mairaj

Advocate High Court, LL.B., B.A. Hons (Political Science)

Email: usmanmairaj95@gmail.com

Abstract

Narcotics abuse is a pervasive international crisis, and Pakistan is no exception. Despite the existence of stringent laws, the prevalence of narcotics in the country remains a significant challenge for society as a whole. Additionally, a concerning trend in narcotics cases is the high acquittal rate. This research explores the reasons for these acquittals through a qualitative analysis of landmark higher court judgments. The study aims to uncover serious deficiencies in narcotics investigations through these judgments, where certain legal principles have been established and procedural lapses identified. The findings of this research are intended to provide a roadmap for law enforcement agencies and prosecutors to enhance narcotics case building more efficiently and to improve conviction rates.

Keywords: Narcotics, War on Drugs, Investigation, Low Conviction Rates, Prosecution

1. Introduction

Narcotics use has been on the rise for whole world over the past decade. The recent and research estimate that 292 million people, or 5.6 percent of the global population who are in their aged 15 to 64, have used drugs in the year 2022. This figure represents a 20 percent increase from a decade ago. In 2022, cannabis has been remained as the most widely used drug: approximately 228 million of its users. Then comes the opioids with 60 million, and cocaine and "ecstasy" at 23 million and 20 million users, respectively. The variety of drugs which are available to consumers has also grown. Narcotics use has numerous harmful consequences: it can result in drug use disorders. The latest estimates indicate that one in 81 people worldwide—64 million individuals—have suffered from a narcotics usage disorder in 2022 (UNODC, 2024b). Pakistan is also grappling with this issue. In 2012 and 2013, the UNODC, in partnership with the Ministry of

Narcotics Control, the U.S. Department of State's Bureau of International Narcotics and Law Enforcement Affairs (INL), and other national stakeholders, had conducted a national survey on narcotics usage with an aim to assess the extent and patterns of substance abuse in the country. The findings indicated that approximately 6 percent of the population—9 percent of the adult male population and 2.9 percent of the adult female population, or about 6.7 million people—had used a substance other than alcohol and tobacco in during the survey period (UNODC, 2024a).

Pakistan is struggling with narcotics issues (Jafari et al., 2015). Drug addiction is a serious problem here, especially for the youth (Ahmed et al., 2020). The UNODC has enlisted this country, for this issue, as one of the worst countries on the globe. Some say that this is partly because this country is near Afghanistan, where a lot of drugs are part of their trade. Whereas, in this country many people are also unemployed, they have poor education, and they do not have good job skills. This makes them more prone to use narcotics for their earnings. All this resulted that million are addicted to drugs. Cannabis is the most popular one. People are also using needles to inject drugs, and this is leading them to HIV. Mostly drug users are men, but the number of women is also going up (Ali et al., 2011). The province of Punjab has a big problem with drug addiction and HIV. Over 800,000 people in Pakistan between the ages of 15 and 64 are using narcotics regularly. This trade hurts the economy and it also affects lives (Channer, 2024).

The use of narcotics and drug addiction are increasing at alarming rates in Pakistan (Zafar et al., 2018). This country also has faced allegations of being a part of the drug trade (Lifschultz, 1993). Scholars argue that the close proximity to Afghanistan and the porous border with it has made this country vulnerable for both the trafficking route and for a market for narcotics. In order to curb this menace, various agencies are working in Pakistan. Law enforcements are playing crucial role. However, despite their significant efforts in controlling drugs, registration of many cases, they often receive little recognition because they are working at the local level. Yet provincial law enforcements have the advantage of a large workforce that can cover every part of the local area. If they were given specialized trainings, better funds for procurement of information and provision of financial rewards then their anti-narcotics efforts could be greatly enhanced (Chohan, 2012).

Furthermore, scholars also argue that the anti-narcotics laws (ANLs) have failed to curb this rapid growth and they have instead exacerbated the suffering of drug addicts. They point out in their work the ineffectiveness of these laws and the challenges in their enforcement. They also raised voice that the government is showing lack of commitment in order to address this issue: this is evident in the absence of adequate medical treatment and rehabilitation facilities for addicts. They suggest that existing laws should be reformed to better support addicts and that harm reduction

programs should be introduced for the greater good of society (Uddin & Rahman, 2020). However, some argue that the issue lies not in the lack of legal and administrative measures to prevent the use, sale, and import of narcotics in Pakistan, but rather in the inadequacy of their implementation. Despite the extensive legal framework available to drug enforcement agencies, the problem of drug control is continuing to worsen (Rahman, 2021). Some suggest that we have to change our policy models in order to curb this menace (Asad, 2006). Yet, no scholar has focused on acquittals of these cases in courts.

There is a substantial absence of research work with focus on comprehension why drug traffickers are acquitted despite the existing of these laws. There is a high rate of acquittals in these cases (Jamshed & Bakhsh, 2024). Therefore, it is crucial to investigate this issue further. If the problem does not lie within the legal framework itself, then it is important to explore why such acquittals are still occurring. Acquaintance with the reasons behind these acquittals will help all concerned for identification of gaps in the investigation or in the implementation of ANLs. Therefore, this study is being conducted to lead concerned authorities towards more effective measures for drug control.

2. Research Objectives

The primary objective of this research is to find out the main reasons of acquittals in narcotics cases. This involves a detailed analysis of landmark case laws with an aim to uncover patterns and certain factors which are contributing to these acquittals. This research aims to reveal deficiencies and shortcomings in the current legal and investigative processes through the meticulous examination of ground-breaking judicial decisions and the analysis of the legal principles applied in them. Furthermore, on the basis of the findings from this analysis, this research will offer targeted recommendations for improvement of investigation and prosecution strategies. These recommendations will focus on identified gaps in the incumbent investigations. This study will help in the improvement of overall effectiveness of the legal framework in securing convictions in narcotics cases. The ultimate goal of this study is to provide actionable insights that can help in refinement of legal practices and to contribute for achieving more successful outcomes in the fight against drug trafficking.

3. Research Methodology

The research methodology for this study involves a comprehensive qualitative approach to analyze acquittals in narcotics cases. This work begins with a systematic review of landmark judgments from higher courts, which have been selected for their relevance and their impact on the legal landscape of ANLs in Pakistan. The analysis is being done with focus on examination of the legal reasoning, procedural issues, and evidential presentations during trial in these cases for the identification of common factors which are leading prosecution towards acquittals. Data collection

includes an extensive review of existing academic opinions, court records, legal commentaries, and related scholarly articles, etc. The study has also incorporated a comparative analysis of higher court judgements of all four provinces of Pakistan in order to contextualize the findings. The objective is to uncover deficiencies and inefficiencies in the current legal and investigative procedures and to propose informed recommendations for upgradation of investigation methodologies in narcotics-related prosecutions.

4. Legal Framework of Narcotics Law in Pakistan

Earlier, narcotics control in Pakistan was governed by laws such as the Opium Act of 1857, the Opium Act of 1878, and the Dangerous Drugs Act of 1930. Later, in 1997, the Control of Narcotic Substances Act (CNSA) was introduced in order to update and to improve these laws (Asad & Zada, 2006). This new law was requirement of the need; it was passed with aimed to bring together and to revise all previous laws, rules and regulations which were related to narcotic drugs, psychotropic substances, and controlled substances. CNSA now focused not only on the regulation of the production, processing, and trafficking of these drugs but also for the seizure of property which is involved in illegal drug trade. Furthermore, the CNSA also cover implementation of international agreements on drug control (Jamshed & Bakhsh, n.d., 2023). Lastly the CNSA was amended in 2022.

This law establishes several prohibitions related to narcotics control. It prohibits the cultivation of narcotic plants, the possession of narcotic drugs, and the import or export of such substances. It also bans trafficking in or dealing in it through finance of the trafficking of narcotic drugs, as well as keeping or operating premises or machineries which are used for the manufacture of these drugs. Additionally, the CNSA also forbids the acquisition and possession of assets which people derived from narcotic offences and lastly it criminalizes aid, abetment, or association with offences provided by CNSA. Furthermore, the new amendments have categorized narcotics into Bhang, Post or poppy straw, Charas, Hashish oil and liquid Hashish, Opium, Heroin and morphine, and Cocaine for the purpose of determination of punishments. It has also established sentencing guidelines on the basis of the quantity of these narcotics.

5. Jurisprudential Analysis of Acquittals in Narcotics Cases

The criteria for selection of landmark cases for analysis of this study is based on various factors: firstly, we have focused on those cases that have been reported in legal journals or databases, this ensures that they are officially documented and accessible for review. Secondly, we choose cases that have had a significant impact on the legal framework of ANLs; it includes those cases that have set important legal precedents or have been widely cited in legal practice. Thirdly, it also includes cases that have received substantial media coverage, public or academia attention. Fourthly, we prioritize cases which are decided by higher courts, such as the Supreme

Court or High Courts, because their rulings carry more weight and influence on lower courts and legal practices. further we include cases with outcomes of acquittals to provide a comprehensive view of how different factors influence case results.

For the purpose of case-laws analysis, we will divide the cases into two tables. In Table A, we will analyze only the most recent Supreme Court cases. In Table B, we will analyze recent cases from the four High Courts: Punjab, Sindh (Karachi), Peshawar, and Balochistan.

Table A
Supreme Court Cases

Sr No.	Title	Citation	Reasons
1	Barkhurdar v. the State.	2023 SCMR 1791	There is nothing in the evidence as to what acutally was recovered from the possession of the accused. There was confusion whether it was the whole plant with stems and flowers or it was the basket/pouch. The court observed that poppy straw is also cultivated for food and manufacturing of seed oil. Mere cultivation of this plant is not an offence. Further in this case it was also not brought on the record whether from whole quantity how much was reported by the forensic agency to be as narcotics.
2	Said Wazir v. the State.	2023 SCMR 1144	In this case recovery was made effected on 09.06.2016 whereas sample parcels were received in the office of chemical examiner on 13.06.2016. There was no explanation on the record about custody of samples during that period. Further, in this case the Moharrar Malkhana who kept the sample parcel in the Malkhana and the concerned constable who delivered those samples to the office of forensic agency were also not produced. The court held that safe custody and safe transmission of sample to forensic agency could not be established.

3	Lal Jan v. the State.	2023 SCMR 1009	In this case as well, there was a delay in recovery of contraband and in receiving sample parcels from those contrabands in the office of forensic agency. Further the constable who delivered those sample in the forensic department was also not produced.
4	Muhammad Hazir v. the State.	2023 SCMR 986	In this case also, the court observed that neither the safe custody nor the safe transmission of the sealed parcels to the concerned forensic department was established in the case because neither the moharrar who kept the parcels during the intervening period nor the constable who deposited the sample parcels in the laboratory were produced during the trial.
5	Javed Iqbal v. the State.	2023 SCMR 139	The court observed that in this case the safe custody of parcels during the intervening period in transmission of those for the forensic analysis remained a mystery. In this case as well the samples were received in the office with delay and moharrar malkhana was also not produced in the court to confirm where he kept those parcels in safe custody.
6.	Akhtar Gul v. the State.	2022 SCMR 1627	In this case also the court give the benefit of doubt to the accused on the basis of principles of safe custody and safe transmission because there was a delay in the recovery of samples and in their transmission to the forensic agency. Further the officer who kept the parcels during that period in safe custody was also not produced as well as the constable who took the parcels to forensic department was also not produced.
7	Ishaq v. the State.	2022 SCMR 1422	In this case, the vehicle from where the narcotics were recovered was never produced during the trial, and the excuse that said vehicle was burnt was

			refuted by the court because no part of the same was ever produced. Further, ownership of the said vehicle was also not established. Besides there was also delay in sending samples to the forensic department.
8	Subhanullah v. the State.	2022 SCMR 1052	In this case the prosecution failed to produce the police official who kept the sample parcels in the safe custody as he was moharrar malkhana as well as the constable who transmitted those samples to the forensic agency was also not produced. The court held that no explanation was provided for withholding such important piece of evidence
9	Zafar Khan v. the State.	2022 SCMR 864	In this case, the court observed that there was contradictory stances between the complainant of the case and those who were cited as witnesses with respect to the secret cavities where the narcotics was found. The witnesses were not certain about the exact location of the cavities and recovery of narcotics.
10	Qaiser Khan v. the State.	2021 SCMR 363	In this case recovered narcotics were shifted from the spot to the police station through a police constable but the record showed that neither the statement of the said official was recorded nor was he produced as a witness to support the safe transmission of the alleged recovered narcotics to the police station. Similarly evidence regarding transmission of samples for forensic was also missing.

5.1. Analysis of Supreme Court Judgments

The most common factors for acquittals in these cases are:

5.1.1. Failure to Establish Safe Custody and Transmission

A recurring issue in many cases which was shown during the study of these cases is the failure to establish the safe custody and proper transmission of the sample parcels to the forensic agency. This includes delays in sending samples, and the failure to produce key witnesses, such as the Moharrar (custodian of the seized items) and the constable who is responsible for delivering the samples to the forensic lab.

5.1.2. Unexplained Delays

Delays which the witnesses not explained in recovering the contrabands and their conveyance of the sample parcels to the forensic agency without adequate explanation were also shown to be another significant reason for acquittal.

5.1.3. Inconsistent or Insufficient Evidence

In several cases, there were inconsistencies in the evidence, such as unclear details about what was actually recovered, contradictions in witness testimonies, and failure to establish the ownership or existence of key items like vehicles from which narcotics were allegedly recovered.

5.1.4. Lack of Key Witness Testimonies

The analysis also show that prosecution often failed to produce key witnesses, such as the police officials who were responsible for management and conveying the evidence, which also led the court to give the benefit of the doubt to the accused.

5.1.5. Failure to Establish Ownership or Source of Narcotics

In at least one case, the prosecution was failed to establish the ownership of the vehicle from which narcotics were recovered or to produce the vehicle itself, resultantly this further weak the case.

These factors highlight serious procedural lapses and inadequacies in the investigation and prosecution process during their own scrutiny phase. These are the major factors which are leading towards the acquittal of the accused.

Table B
High Courts Cases

Sr No.	Title	Citation	High Court	Reasons
1	Khaliq Dad v. the State.	2024 PCrLJ 678	Quetta High Court	In this there was contradictions in the statement of witnesses. The complainant of this cases improved his statement during the trial which the high court observed in reappraisal of evidence. complainant and both recovery witnesses belied and contradicted each other. Further the dashboard of the car from where contraband was recovered was also not produced during the trial
2	Ghulam Hussain	2023 YLR 737	Quetta High Court	In this case, though huge quantity was involved yet the evidence was silent as to the

	v. the State.			fact that who had taken the representative sample to the analyst. Further the documentary evidence was also lacking as the register of moharrar malkhana was not produced. Samples were also taken with negligible quantity.
3	Talal v. the State.	2023 YLR 81	Quetta High Court	In this case, the complainant of the case during evidence admitted that no identification marks were put on the recovered narcotics to be used during the trial. The raiding police party was accompanied by lady constable yet she was also not produced. Further there was contradictions in statements of witnesses regarding handing over of the narcotics.
4.	Haneef v. the State.	2023 YLR 448	Karachi High Court	In this case, the accused was taken into custody on the spy information on a busy railway station, however, no private persons were invited to join the investigation of the case as independent witness. The police officials said they used torch light for documentation of recovery proceedings. The said torch light was not produced during the trial. Further, moharrar malkhana was also not produced. The register regarding entry of contrabands in malkhana was also not produced.
5	Lal Bux alias Lal v. the State.	2023 YLR 321	Karachi High Court	In this case, the court observed that the report of forensic laboratory revealed that the narcotics was received with an unexplained delay.

6	Zafar Ali v. the State.	2023 YLR 1942	Peshawar High Court	In this case as well the police official who took the samples for transmission to forensic laboratory was not produced. Further in this case recovery witness did not depose about the handing over of the case properties to moharrar.
7	Naveed v. the State.	2023 PCrLJ 154	Peshawar High Court	In this case, the accused was allegedly apprehended while trafficking narcotics. However, during the trial, it was revealed that neither the vehicle was registered in his name, nor was any driving license taken into custody from him. Additionally, there were material discrepancies in the witnesses' depositions during the trial. The date and time of departure from the police station and return were also not proven through any written documentary evidence. The samples were submitted with a delay, and the test was conducted by an examiner who was not qualified.
8	Saqib Ramzan v. the State.	2023 PCrLJ 1479	Lahore High Court	In this case, the complainant, who was a police official, also assumed the role of the investigation officer. The allegation was that the accused, while in custody, disclosed information about narcotics in his house during interrogation. The court rejected this story as true due to the existence of hostility towards the accused. Since the disclosure was made at the police station, it was not accepted as credible.

9	Abdul Hamid v. the State.	2023 PCrLJ 1103	Lahore High Court	In this case, the allegations were that the accused was driving a vehicle when he was stopped by the police. Another vehicle arrived from which narcotics were recovered, and the accused then fled the scene in his vehicle. The court held that this was an improbable and unnatural story. The accused was arrested eight months later, but no attempt was made to conduct identification test proceedings.
10	Tereze Hluskova v. the State.	2022 PCrLJ 1846	Lahore High Court	In this case, the accused was allegedly apprehended at the airport while attempting to smuggle narcotics. The court observed that the failure to produce the official documents of the complainant, which would show that he was authorized to perform duties at the airport, was a crucial piece of missing evidence. Furthermore, the lady constable who searched the accused was also not produced. Additionally, no CCTV footage from the airport was taken into custody to support the case.

5.2. Analysis of High Courts Judgements

The common factors which are leading to acquittals in these cases from the high courts of Pakistan include:

5.2.1. Contradictory Statements

There were inconsistencies and contradictions in the statements of witnesses, including the complainant and recovery witnesses, which undermined the cases for convictions.

5.2.2. Failure to Produce Key Evidences

Analysis of these cases show that important and central pieces of evidences, such as the vehicle dashboard, torchlight which was used during recovery, absence of identification marks on recovered narcotics, and

official documents authorization of police actions, were not produced during the trials. They weakened the position of prosecution.

5.2.3. Unexplained Delays

Delays in the submission of narcotics samples to the forensic laboratory and the receipt of forensic reports were frequently observed, with no satisfactory explanations, they are one of the main leading factors to doubts about the integrity of the evidence.

5.2.4. Lack of Independent Witnesses

In several cases, the absence of independent witnesses during the recovery of narcotics, especially in public places like busy railway stations, was considered as a significant factor in the acquittal, as it raised questions about the credibility of the police testimony.

5.2.5. Mishandling of Evidence

There were multiple instances in the above cases where the safe custody and proper handling of the recovered narcotics were not established. The failure to produce the Moharrar Malkhana (custodian of the recovered items) and discrepancies in the management of the case property further weakened the cases.

5.2.6. Improper Investigative Practices

The assumption of dual roles by police officials is not a new situation for the courts, however, acting both as complainant and investigation officer, along with the failure to conduct identification parades or properly document recovery proceedings, were highlighted as serious procedural lapses in the above mentioned cases.

5.2.7. Hostility and Bias

The courts were also skeptical of allegations that appeared to be influenced by hostility or biasness towards the accused, especially when the accused was in custody and allegedly disclosed information under suspicious circumstances.

6. Discussion

This analysis of Supreme Court and High Court judgments is significant for comprehending the recurring flaws in narcotics-related investigations that lead to acquittals. This study has highlighted the systemic weaknesses within the current law enforcement and prosecution processes through detection and recognition of these common issues such as failure to establish safe custody and transmission of evidence, unexplained delays, inconsistencies in testimonies, and improper investigative practices. The insights that could be gained from this analysis is a future guide for corrective measures. If investigation agencies and prosecution address these deficiencies with an aim to improve the integrity and reliability of investigations, then ultimately it will lead them towards more stronger cases and higher conviction rates in narcotics-related offences. This analysis, therefore, serves as a roadmap for reforms.

7. Recommendations

To improve the investigation and prosecution of narcotics cases, several measures are recommended to be implemented which are based on the analysis of the Supreme Court and High Court judgments. First, it is important to establish clear and stringent protocols for the safe custody and transmission of narcotics samples. All personnel involved, from seizure to forensic analysis, should be properly trained and they should be held accountable for the maintenance of the integrity of evidence. Implementation of a tracking system to document the chain of custody, and to ensure that each step in the handling of evidence is recorded and verifiable, is also a good solution (Jamshed & Bakhsh, 2023, 2024).

Furthermore, timely submission of narcotics samples to forensic laboratories must be prioritized by investigation agencies. For this purpose, strict timelines should be set and enforced. There can be penalties for non-compliance of this timeline in order to minimize the risk of evidence tampering. Moreover, thorough preparation of witnesses before trial is necessary to ensure they provide clear, consistent, and accurate testimony. Additionally, the production of key witnesses, such as the Moharrar and the constable who is responsible for transportation of samples, during the trial should be mandatory. Relevant physical evidence, such as vehicles or items used during recovery operations, must also be presented in courts. In cases wherein presence of public is available their involvement of independent witnesses should be encouraged. This practice should be standardized, particularly in situations where the presence of neutral observers can substantiate the validity of the investigation actions. Likewise, in order to avoid conflicts of interest and biases, the roles of complainant and investigation officer must be distinctly separate. This separation will reduce the likelihood of procedural lapses and increases the impartiality of the investigation.

Moreover, comprehensive training programmes for law enforcement officials on the basis of best practices for narcotics investigations is requirement of the time. Continuous professional development programmes should be implemented with an aim to keep officers updated on the latest legal standards and investigative techniques. Finally, regular reviews of investigative practices should be conducted to identify recurring issues. This ongoing assessment will help to maintain high standards in the management of narcotics cases and to ensure continuous improvement in the criminal justice system (CJS).

8. Conclusion

This study has addressed a critical gap which was existed in the literature on narcotics cases through concentration on the reasons behind acquittals, an area that has been largely overlooked by scholars who has primarily discussed broader issues in the war on drugs. This study has shed light on why many well-founded cases ultimately resulted in acquittals

through drawing attention to the common factors that lead to acquittals. This lack of effective deterrence has nurtured a belief among drug peddlers that the CJS can be manipulated in order to avoid convictions. To illustrate these common issues, this study has analyzed 20 cases—10 from the Supreme Court and 10 from various High Courts across Pakistan—all are chosen to reveal recurring problems and areas for improvement. The recommendations provided in this work are straightforward and practical in nature: they are offering actionable solutions for both investigative and prosecutorial agencies to enhance their effectiveness and to ensure that the CJS more reliably delivers convictions in narcotics cases.

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