

**THE FEDERAL TAX OMBUDSMAN
ISLAMABAD**

COMPLAINT NO.15257/KHI/IT/2026

Dated 20.08.2026¹ * R.O Karachi

Mr. Amir Amin Thara,
M/s. APWA Flour Mills,
NTN 4176598
A 186, Block 13C,
Gulshan e Iqbal Karachi

...Complainant

Versus

The Secretary,
Revenue Division,
Islamabad.

...Respondent

Dealing Officer	: Mr. Badruddin Ahmad Quraishi Advisor
Appraisal Officer	: Mr. Muhammad Tanvir Akhtar, Advisor
Authorized Representatives	: Mr. Shafeque Ahmed, Adv
Departmental Representatives	: Mr. Mehran Khan, DCIR, CTO-II, KHI
	: Mr. Syed Sabeh Hussain, DCIR, CTO-II, KHI
Date of hearings	: 07.09.2026, 15.09.2026 & 23.09.2026

FINDINGS/RECOMMENDATIONS

The complaint was filed under Section 10(1) of the Federal Tax Ombudsman Ordinance, 2000 (FTO Ordinance) against the department (Deptt) for failing to process an income tax refund claim for tax year 2024 amounting to Rs.26,350,537/-.

2. Briefly, the complainant is an individual engaged in the business of Manufacturing of wheat products who filed an income tax return [for the tax year 2024 on 22.09.2024 claiming an income tax refund of Rs.26,350,537/- against adjustable tax deductions mostly on import of wheat u/s 148 of the Income Tax Ordinance 2001 (the Ordinance). The refund application was filed on 14.12.2024. However, the Deptt failed to issue any refund order to date; hence this complaint.

¹ Date of registration in FTO Secretariat



3. The complaint was referred to the Secretary, Revenue Division for comments, in terms of Section 10(4) of the FTO Ordinance read with Section 9(1) of the Federal Ombudsmen Institutional Reforms Act, 2013. The Deptt failed to file any written comments.

4. Argument heard, and record perused.

5. Flour mills in Sindh (or anywhere in Pakistan) cannot import wheat directly without conditions or restrictions. The import of wheat is strictly regulated through statutory frameworks, policy directives, and administrative procedures set at both the federal and provincial levels. Accordingly, the complainant was asked to submit documentary evidence of approval from the Govt for import of wheat. In response, the AR submitted a copy of Office Memorandum dated 06.03.2024 issued by the Deputy Agricultural Development Commissioner, Ministry of National food Security & Research wherein import of specified milling wheat was allowed by the private sector till 31.03.2024 and no further import should be allowed in any case after 31.03.2024. Accordingly, the AR was asked to furnish the copies of GDs during the permitted period but the AR failed to submit any GDs for the permitted period. Moreover, the complainant claimed an income tax refund amounting to Rs.26,350,537/- against excess adjustable tax deductions mostly on import of wheat u/s 148 of the Ordinance for tax year 2024. The complainant e-filed a refund application for tax year 2024 on 14.12.2024. The Deptt is required to issue the refund within sixty days of the filing of the refund application in terms of section 170(4) of the Ordinance reproduced below:

"170(4). The Commissioner shall, within sixty days of receipt of a refund application under sub-section (1), serve on the person applying for the refund an order in writing of the decision after providing the taxpayer an opportunity of being heard"



6. FINDINGS:

- i. The Complainant's whole claim hinges upon the Office Memorandum dated 06.03.2024 issued by the Deputy Agricultural Development Commissioner, Ministry of National food Security & Research ***wherein import of specified milling wheat was allowed by the private sector till 31.03.2024 and no further import should be allowed in any case after 31.03.2024.*** AR failed to produce the GDs to examine whether imports fall within the allowed timeframe.
- ii. Evasive and non-committal attitude of the Department is deplorable. It actually gives a walk-over.
- iii. Failure of the Deptt to dispose of the income tax refund claim for tax year 2024 within the prescribed period tantamount to maladministration under section 2(3)(ii) of the FTO Ordinance.

RECOMMENDATIONS:

7. FBR to direct:-

- (i) the Commissioner-IR, Refund Zone, CTO-II Karachi to process income tax refund for tax year 2024 after obtaining GDs as discussed in para 5 & 6 above and after affording a proper opportunity of hearing to the Complainant, in accordance with law; and
- (ii) report compliance within 30 days.

8. CCIR, CTO-II Karachi to look into the non-filing of Parawise comments and utter failure in presenting departmental position vis-à-vis allegations levelled by the Complainant.

Dated: 13 OCT 2026

(Mr. Zafar ul Haq Hijazi)
Federal Tax Ombudsman

