

# ROLE AND SIGNIFICANCE OF SENATE IN THE FEDERATION OF PAKISTAN: AN ANALYSIS BEFORE AND AFTER 18<sup>TH</sup> AMENDMENT TO THE CONSTITUTION OF 1973

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## **Abstract**

*Federation is a setup which has more than one level of governments. Bicameralism is the essential feature of federations. Bicameralism is most suited to the multi-ethnic states which have inherent potential to end up in chaos in absence of satisfactory division of powers. Bicameralism ensures continuity of legislation, second deliberation, impartial role in legislation and equal representation of all diverse federating units, balance of political power and accountability. Bicameralism is also best choice for transitioning democracies. In Pakistan, all constitutions after partition maintained uni-cameralism until separation of East Pakistan. Only after Dhaka debacle it was realized that domination of one federating unit, Punjab, and grievances of smaller ones should be patterned by some other way. It was realized in through bicameralism in the constitution of 1973. Senate is the upper body of parliament with equal representation from all federating units making sure that smaller provinces are characterized not by their numerical strength. Senate should guarantee impartiality and second deliberation to the matters considered at National Assembly overshadowed by majority population provinces. Provincial autonomy was the long demanded right of provinces which was brought about through 18th amendment to the Constitution. This amendment gave a new and dynamic role to the Senate. Multi-ethnic society like Pakistan needs equality at some elevated level where the small federating units can have feeling of equality and utmost power. This study is aimed at analyzing the role of Senate of Pakistan thoroughly and theoretically.*

**Keywords:** Federation, Bicameralism, Uni-cameralism, Transitioning democracies, Federating Units.

## **Introduction**

**F**ederation is a system of governing various federating units through a center and maintains a relationship by giving adequate autonomy. With autonomy of federating units national unity is not compromised. Federation came into being through a process of convergence of geographical, economic and security issues. Federation evolved into a system in USA, Switzerland and Australia. The federation is managed through a constitution dealing matters of federating units

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at one or two levels. Geographical contiguity is an integral factor which helped evolution of this system in USA while prevented it in Britain. Pakistan had also this problem of geographical contiguity<sup>1</sup>.

Pakistan inherited a system from British colonial power where the authority was maintained through much control. Pakistan inherited the provinces which experienced less federalism. In NWFP and Balochistan, tribal authorities were recognized by British through Sandeman Treaty or Forward treaty<sup>2</sup>. Pakistan found federalism as most suited system after partition but the initial constitutions (1956 and 1962) retained uni-cameralism. It was after separation of one federating unit, East Pakistan (Bengal) that was geographically far away, that need of bicameralism felt. Bicameralism provides a framework of representation of provinces at two levels. This paper focuses on the role of senate in federation of Pakistan and its anticipated significance in a transitioning democracy.

## Literature Review

Federalism was the most suitable choice of Pakistan as economy, security and identity were the common goals of all federating units. Dr. Iram Khalid (2013)<sup>3</sup> in 'Federalism in Pakistan: Prospects and Problems' endeavors to surface the history of constitution making and predicaments in this way. Pakistan's choice of federalism was deep rooted in British legacy. During Pakistan movement Islam emerged as a common identity to join distinct federating units. This reality gave credence to the idea of federalism as a viable system for Pakistan. Government of India Act, 1935 was adopted as Pakistan's transitional constitution which also laid foundation of federalism and further constitution making. Uni-cameralism and bicameralism were most contested choices within federalism. Bicameralism was opted for after separation of East Pakistan.

Muntazra Nazir takes a deep insight into federalism as a state system theoretically in 'The Problems and Issues of Federalism in Pakistan'. Geographic contiguity and democracy are two main features of this system. Level of centralization may vary. Diversity of federating units remains safe in constitutional set up under federalism. However, a common identity is divulged in search of a national outlook based on a common factor. Economic prosperity and security are common goals. The author maintains that choice of federalism in Pakistan was also result of choices of Muslim League's leadership during

Pakistan movement to safeguard rights of Muslims in all federating units of India.

Mansoor Akbar Kundi<sup>4</sup>, establishes in his research paper 'Federalism In Pakistan: Problems and Prospects' that federalism was the cornerstone of Pakistan's post partition set up as it was indispensable for the establishment of Pakistan. Muslim League's political negotiations laid this foundation as their all constitutional demands revolved around federalism. The fundamental principles of federalism were undermined by political crises after creation of Pakistan. Constitutional history of Pakistan is marred by various constitutional crises due to disagreement on level of centralization.

The level of decentralization was finally decided through 18<sup>th</sup> Amendment to constitution. Concurrent list was abolished transferring about 47 items to provinces. Through this amendment the role of Senate is also increased and made effective. The upper house is the cornerstone of bicameral federalism. Tahir Mehmood<sup>5</sup> in his research piece 'A Comparative Analysis of the Functioning of the Senate in USA and Pakistan' tries to give the comparison of role and functioning of the Senate. The concept of Senate is adapted from American federalism in the constitution of Pakistan. US Senate is however, very powerful chamber with equal legislative powers with the first chamber. In Pakistan, Senate was not that effective when formed. However, its role and scope is enhanced through 18<sup>th</sup> Constitutional Amendment. There is no theoretical ground for committees in American Senate but in practice it has become integral to the functioning of Senate. In Pakistan's Senate Committees are getting momentum but still their role is recommendatory.

## Objectives

This study has following objectives:

- To understand the role of federalism in a transitioning democracy like Pakistan
- To get an insight into suitability of bicameralism in federalism and study the role of Senate
- To comprehend the role of Senate before 18<sup>th</sup> Amendment and enhanced significance after it.

## Federalism and Federation of Pakistan

According to Stanford Encyclopedia of Philosophy, “Federalism is the theory or advocacy of federal principles for dividing powers between member units and common institutions”. Sovereignty in Federal system is functioned through decentralized order which is divided among federating units at, at least two levels, usually through constitution. The levels are divided to ensure that units have final authority at one level and are self-governing too. The division of power varies, however it is a settlement between center and the units but usually center has foreign and defense policies but the federating units can also have international role<sup>6</sup>.

By middle of eighteenth century global politics was mainly among imperial states which were about two-third of total countries. By twenty first century the same proportion had federations. In 1994, it was estimated about over 100 of 180 recognized states were federation having 80% of global population. This system has a tendency of higher representation of individuals. This system has been preferred system of states due to political participation and economic efficiency<sup>7</sup>. In political science, plethora of literature has been written on federalism but there is no consensus on a single definition or theory. This is primarily understood by the etymology; in Latin word ‘foedus’ means covenant. Thus, federalism encompasses both unity and diversity. The covenant of federal government and constituent units is about the powers of the respective units distributed by the federal government and also their entitlement to participate in government at federal level. This is the relationship of coordination, cooperation and subsidiarity. The role of subsidiarity explains that powers are delegated to the constituents units not just as to be shared but actually because this exercise of power is in their interest and they are accountable to perform efficiently<sup>8</sup>. Forms of federal governments vary in different federal states as this concept is embedded in society and history.

In federalism, statehood of federal state is different from that of constituent units. Latter exercises it within the limit set by federal government. Constituent units cannot enjoy external sovereignty rather federal state as a whole enjoys sovereignty. Constitutional Compact Theory considers the constituent units actual bearers of sovereignty which approach confederalism instead of federalism. In Decentralization Theory, constituent units are neither states nor sovereign. This theory does not see any qualitative difference in constituent units or local governments. The system is only for administrative

purposes. According to three-circle-federalism the criteria of statehood and sovereignty are not central. The classical theories are inherently dualistic<sup>9</sup>.

Schmit considers federalism as a revolution defining the face of globe. Three first modern states adopted federalism; United States of America in 1787 constitution, Switzerland under 1848 constitution (later 1874 constitution) and Canada under 1867 Constitution. A defining factor of federalism is the division of law making powers between center and constituent units. The determining factors of federalism can be summed up as;

- A sense of insecurity and need for common defense
- Aspiration of economic advantage
- Historic association continued in this form of system
- Some form of mutual compatibility
- History of peaceful co-existence<sup>10</sup>.

Friedrich maintains that federation is a political evolution, rather than a system it is a process. Any design or pattern of jurisdictions is merely a phase. This system is usually adopted and suited to multi-national polities as they desire a union without compromising their regional and sub-nationalities. It leads to integration and diversification, both Akindele and Olaopa. The system of post-colonial state lies in the colonial state system. The apparatus developed by colonial states aims at subordinating all groups and classes of colonized state. This aim is attained by a strong and dominant military-administrative system which a colonized state inherits. This domination also earns maximum control over national economic surplus. Post-colonial states practice more centrality where control lies in bureaucracy. Hamza Alvi describes the inheritance of colonial system by post-colonies and its functioning as 'overdeveloped states'. Pakistan's federation problems are better explained through the thesis of over developed state where centrality is functioned to control the relation between center and provinces<sup>11</sup>.

Pakistan inherited the federalist form and set up given to British India by British government. Government of India Act, 1935 was an effort to accommodate disparate regional ethnicities and aspirations. Through this set up the spirit of federalism was aspired to be put in practice as to accommodate and enhance ethnic diversity. Pakistan was later carved out of Muslim majority provinces. Two wings of Pakistan after 1947 were not geographically contiguous and there was a continued tussle for power between East and West wings. East

Pakistan had about 55% of population which justified their claim for representation according to proportion of population. In 1952, Nazimuddin Report proposed bicameralism with 60 seats in upper house and 200 seats in lower house. In 1953, Muhammad Ali Bogra formula endeavored to readjust the balance by proposing 10 and 165 seats for East Pakistan respectively and 40 and 135 seats for West Pakistan respectively. There was a provision proposing joint session of parliament in case of disagreement. This scheme gave majority to East Pakistan in lower house but it was not adopted. Punjab's Chief Minister campaigned and asserted zonal sub-federation for West Pakistan which was adopted. In 1955, One Unit Policy, merging territories and provinces was an attempt to carve out equal provinces and to develop the base for federations of 1956 and 1962<sup>12</sup>.

After the separation of East Pakistan, in the Constitution of 1973, the balance is struck by giving share according to population in lower house and equal representation in Senate. Punjab dominated the lower house with 58% of population and ultimately in bicameralism it was tried to be adjusted. But Senate's role was still limited as it had no control over money bills<sup>13</sup>. In Pakistan the major obstacle in federalism's viability has been derailing democratic system which is prerequisite to it. Lack of pluralistic framework is another predicament. Weak and divided political forces could not contest effectively for provincial rights<sup>14</sup>.

### **Bicameralism-A Viable System in Pakistan**

Bicameralism is widely associated with federalism only. But various states which are non-federal opted to be bicameral. So many non-federal states opted two or more houses of parliament such as Britain, France, Japan and Netherlands. All federations are not bicameralism too necessarily. Bicameralism is closely associated with federalism as most of the federal states opted for bicameralism. United States had a long debate over federal legislature whether representation should be on basis of population representation. Connecticut Compromise brought respite in form of bicameral legislature where lower house, House of Representatives, is on the basis of population and Senate on equal representation. Following this precedent, most federalist states opted for bicameral legislatures but there have been enormous variations in method of selection of members and regional composition. Often it is to ensure equality of state representation. Almost nine federalist states are strictly adhering to equal

state representation including USA, Australia, Argentina, Mexico, Brazil, Pakistan and Russia<sup>15</sup>.

The fundamental role of federal second chambers is legislation, reviewing federal legislations affecting regional interests. German Bundestrat performs an additional function of interprovincial coordination<sup>16</sup>. Bicameralism in United Kingdom evolved without a written constitution. Lower house, House of Commons, was convened in thirteenth century to assist House of Lords. In House of Lords, membership was through royal appointment, inheritance and seniority of Catholic Church. By mid-seventeenth century, lower house was protesting against unchecked power of upper chamber. In 1832, legislative reforms redistributed the seats diminishing role of aristocracy and clergy in House of Commons. Currently, the powers of House of Lords are considerably diminished still it maintains the power to delay the bill for one year (National Democratic Institute for International Affairs).

A long debate in United States preceded adoption of bicameral federal system. Large states demanded for representation according to population. . Diverse interests of 13 states required imposition of federal system. Finally, Connecticut Compromise of 1787 brought final form of bicameral federal system. This compromise established a bicameral system where House of Representatives has representation. Smaller states had a continued demand of equal representation. Following War of Independence, central system was required. Larger states emphasized according to population and Senate has equal representation. This set up was a result of contesting demands of both groups of states. Difference of terms of legislators of lower and upper house ensure distinctiveness. Senators are elected for six years. Senate was conceived for more deliberation and longer term ensures this deliberation. One-third of Senate goes for re-election after two years ensuring continuity (National Democratic Institute for International Affairs).

According to the data of April 2014, about 41.5% of global legislatures are bicameral. In Europe 64.58% of legislatures were estimated to be unicameral. The first development of bicameral set up was in United States federation. The early confederations demanded unanimous passage of legislation from both the houses. In States General of the Dutch Republic matters of war, peace, truce and financial contributions were decided with unanimous vote. Gradually these systems also evolved. In USA, the compromise opened a new way in political

development. Earlier the Senators in USA were elected by indirect vote by state legislatures, who are elected through direct vote after seventeenth amendment to the constitution in 1913. This was the first parliament which was not representing social classes rather it was designed to be based on territories<sup>17</sup>.

Madison wrote that the idea of Senate conceived in USA had more practical benefits than theoretical. It is a constant check on government. It could curb the reactionary or emotional legislation of the other chamber. This house had better position of deliberation and verification and it was factor of stability through continuity. For these purposes, Madison had the view that Senate must be small with small number of members. However, in United Kingdom the upper house remained a stabilizing factor against increasing democratization with retaining the character of aristocratic chamber. In systems which are inspired by Westminster models and where governments are part of lower houses, Senates are taken as a body neutralizing and independent factor<sup>18</sup>.

In parliamentary democracies there is apprehension that legislator may become a tool of executive as legislators are controlled by political parties. Upper houses do not constitute the composition of executive. It can play a role of strong reviewing authority. It also may ensure consensus democracy. Upper houses play a role in forming public opinion and a viable opportunity of second thought<sup>19</sup>.

Bicameralism is a viable system of legislature for heterogeneous society like Pakistan. Since partition, the problem of equitable representation was main obstacle in the way of smooth federation. East Pakistan had continuous apprehension about West Pakistan's domination in military, bureaucracy and politics. Federation as a system of Pakistan was the very choice of its leadership before its creation as leaders of Muslim League had been urging a federal system to ensure rights of Muslim minority. Quaid-i-Azam had ensured in 1945 that viable system for Pakistan would be autonomy of all federating units. After partition, the quest for acceptable and equitable representation of federating units led to constitutional crises. This was a continued dispute between East and West Pakistan (Muntazra).

After separation of East Pakistan, Punjab became dominant federating unit being most populous. There was natural uneasiness on part of smaller federating units. The issue was sought in form of bicameral legislature in the constitution of 1973. Senate, the upper house, balanced the representation in

lower house according to population through equal representation of all federating units. This was adopted to allay the fears of small federating units. Senate's role in federation of Pakistan evolved over the decades. Political instability remained an obstacle in the way of smooth growth of legislation to a strong federation. Senate's role enhanced after 18<sup>th</sup> Amendment to the Constitution of 1973.

### **Role of Senate Before and After 18<sup>th</sup> Amendment**

Bicameralism in Pakistan is result of cognitive insecurity due to separation of East Pakistan. Pakistan inherited the constituent Assembly as result of 1945 elections in India. There had been lot of hindrances and obstacle in way of smooth constitution making. One of them was form and kind of legislature. First Constituent Assembly was dissolved in 1954 over political differences. Second was introduced in 1955 which gave first constitution on 23<sup>rd</sup> March 1956. This constitution introduced unicameral legislature. Second constitution, which was given by General Ayub Khan in 1962, also introduced unicameral constitution with presidential system<sup>20</sup>. This constitution was framed to give maximum power to the office of President ignoring ground realities and demands of East Pakistan. This crisis brewed as ethno-cultural and regional diversities were ignored.

After separation of East of Pakistan, bicameralism was introduced in the Constitution of 1973. There was a realization now that sub-national authorities must be represented. After separation of East Pakistan, Punjab dominated with about 58% of total population. In lower house, naturally Punjab dominated. In order to balance this dominance and to avoid augmenting of grievances of small provinces Senate was formed with equal representation of provinces. This was conceived as adequate representation for regional and minority interests and viewpoints. The problem of ethno-regional differences was endeavored to be resolved through equal provincial share in upper house. This house also ensures particular kind of expertise for second thought as reserved seats for technocrats<sup>21</sup>. The Senate was formed with some objectives as;

- A majority constrained federalism
- Equal representation in politically empowered Senate
- As a legislative chamber with equal power to National Assembly
- As an institution where interest of states could be projected and safeguarded

- A deliberative chamber where greater and diverse experience is brought on questions of significance<sup>22</sup>

Initially this chamber was conceived and formed for with no extra ordinary role or unique role. The very immediate purpose was to off- set lower house's representation on basis of population. The arrangement could be formed to before Dhaka fall to placate the political grievances of East Pakistanis. But after this crisis which separated one half of the country it was important to provide a platform at highest level to characterize and honor regional, linguistic, cultural and religious and community representation.

Senate was also formed with a principle of 'Chamber of continuity'. To ensure smooth transition of power of lower house and government, this house remains in place to oversee this process. This house has no role in making and unmaking of the government. This principle ensures its role as a Second and higher chamber. This house has various Senate committees to ensure overseeing few matters in particular But there is one matter where this house has been constrained considerably; money bill. The matters in federal legislative list can be initiated in any of the houses except money bill which is sent to the Senate after passage from National Assembly<sup>23</sup>.

In 1973, when this house was formed under constitution it had 100 seats. First elections of Senate held on 10<sup>th</sup> July, 1973. Article 59 of Constitution provided for formation of this house. Each provincial assembly elects its members on respective seats. This is the permanent legislative body with a process of continuity. The house is elected for six years. One-half of the house is elected every three years<sup>24</sup>. After 18<sup>th</sup> Amendment to the Constitution, the division of seats is as following;

**Table-1: Division of Seats**

Seats from Four Provinces	23 seats from each Province <ul style="list-style-type: none"> <li>• 14 General Seats</li> <li>• 4 Technocrats/Ulema</li> <li>• 4 Women</li> <li>• 1 Non-Muslim</li> </ul>
Islamabad Capital Territory	4 seats <ul style="list-style-type: none"> <li>• 2 General Seats</li> <li>• 1 Technocrat/Alim</li> <li>• 1 Woman</li> </ul>
FATA	8 seats

The role of Senate enhanced considerably after 18<sup>th</sup> Amendment to the constitution. This amendment fulfilled the promise of provincial autonomy. Concurrent list was abolished and provinces were entrusted with all those portfolios. This amendment also brought spirit to the role of senate as it was promised at the time of promulgation of constitution. The main changes brought to the role of constitution were;

- Annual Report on implementation of Principles of Policy is to be placed before constitution
- No ordinance can be promulgated by the President when Senate is in session.
- For recommendations on money bill, time duration is increased from 7 to 14 days.
- The responsibility of Prime and Minister and the Cabinet has been ensured to both house, instead of lower house.
- Members are increased from 100 to 104, four seats given to Non-Muslims
- Number of Compulsory working days increased from 90 to 110 days (PILDAT, 2011).
- Chairman and Deputy Chairman are re-elected at the time of election of one-half of the house. Both are elected within the house.
- Senators are elected to the seats from respective provincial assemblies
- Members are elected on basis of proportional representation by means of single transferable vote to fill seats reserved<sup>25</sup>.

Theoretically, Senate in Pakistan enjoys legislative parity with the National Assembly. But practically its role is revisory. There are no diverse sources of legislation. Mainly legislation arises from the National Assembly and is based on priorities of the government. Still, legislature is considered subservient to the executive in Pakistan which undermines the effective functioning of the Senate. The legislation brought to the Senate is mainly divided into two categories;

- Official Business; all bills and resolutions introduced by any minister
- Private Business; any bill, resolution and privilege motion introduced by any Senator (Not a minister)<sup>26</sup>.

This draws a clear distinction between minister and not minister legislation. According to rule 86 when any bill is introduced it is referred to the standing committee. It is the minister who can ask for Senate referral and bill's

immediate consideration. The standing committee cannot be comprised of less than 6 and more than 12 members. The concerned minister automatically becomes ex-officio member of the committee. According to need, further committee or sub-committees can be formed on the matter. From National Assembly a bill is not directly sent to Senate until a motion is carried out. If that motion is passed the motion is referred to the Upper house. Senators cannot continue the debate on any matter for indefinite period. A period is fixed for this purpose<sup>27</sup>.

In US federalism, the basic principle is complete division of powers. Senate is considered to be a house of honor and repute. In British parliamentary system House of Lords is a mere accommodative body enjoying almost no legislative power. Pakistan stands between these two systems. Its form of government is parliamentary. But the needs of federalism required for a bicameral parliament adjusting federating units. Senate was formed as a result of grievances of provinces against domination of a single province overshadowing their role and scope.

Since, there is no complete division of powers through constitution between legislature and executive. Pakistan is a transitioning democracy. The systems are evolving. The main hurdle in the way of neutral functioning of Senate is powers of executive to interfere in legislation through business official. The other predicament is still it's no power over money bills. The Senate was formed to address and represent the regional and ethnic diversifications of federating units. However, the differences over distribution of economic resources still persist.

## **Conclusion**

Pakistan opted for federalism due to two main reasons; demand for federalism in Pakistan movement and throughout political negotiations and movement of Muslim League. It was the only way for safeguarding rights of Muslims in Hindu majority India. Pakistan inherited this system also through British legacy which used federalism after 1909 to control India by sharing powers gradually with federating units. After partition, the major obstacle in the way of smooth transition to an acceptable federalism was due to constitutional crisis emerging out of political differences. East Pakistan crisis was the deciding point for opting bicameralism. The upper house was formed to placate the grievances of small provinces through equal representation to adjust Punjab's

domination in National Assembly. But its role could not be effective until passage of 18<sup>th</sup> Amendment. This amendment paved the way for enhanced role of Senate with a better position to share legislative authority. Now theoretically Senate has legislative parity with the lower house. But still there is long way to go to evolve senate into a neutral and effective body.

## NOTES

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- <sup>25</sup> Mehmood, "A Comparative Analysis of Functioning of Senate in USA and Pakistan."
- <sup>26</sup> Ibid.
- <sup>27</sup> Ibid.