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# PAKISTAN

## SUBMISSION TO THE UN COMMITTEE ON ECONOMIC, SOCIAL AND CULTURAL RIGHTS, 80TH SESSION, 2-13 NOVEMBER 2026



## SUMMARY

This submission was prepared for Pakistan's review of its second periodic report by the UN Committee on Economic, Social and Cultural Rights in November 2026. In it, Amnesty International focuses on Pakistan's compliance with the right to just and favourable conditions of work, form and join trade unions and health as well as the right against non-discrimination under the Covenant.

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# 1. INTRODUCTION

Amnesty International submits the following briefing to the 80th Session of UN Committee on Economic, Social and Cultural Rights (CESCR) regarding Pakistan's compliance with the International Covenant on Economic, Social and Cultural Rights (ICESCR) in advance of the review of its second periodic report. The submission reflects on the Government's response to the list of issues whilst focusing on the following critical issues covered by the Covenant:

i. Justiciability of economic, social and cultural rights (article 2(1)
ii. Non-discrimination (article 2(2))
iii. Right to just and favourable conditions of work (article 7)
iv. Right to form and join trade unions (article 8)
v. Right to health (article 12)

This submission is based on evidence collected by the organization, reports by trusted partners and its own research reports on sanitation workers in Pakistan ("Cut us open and see that we bleed like them"[1]), garment sector workers in South Asia ("Abandoned by fashion",[2] "Stitched up"[3]), and the impact of climate change on older persons and children ("Uncounted: Invisible deaths"[4]) in Pakistan.

# 2. JUSTICIABILITY OF ECONOMIC, SOCIAL AND CULTURAL RIGHTS (ARTICLE 2(1))

Pakistan has not taken substantive steps to incorporate economic, social and cultural rights into its domestic legislation as binding rights, and they remain part of the Principles of Policy within Pakistan's constitutional and legal framework. This is despite the fact that in its 2017 concluding observations on Pakistan's first periodic report, the Committee recommended that Pakistan take "all measures necessary" to ensure that these rights are "fully incorporated into its domestic legal order with a constitutional rank equal to that of civil and political rights and to ensure that all these rights are applied by the domestic courts at all levels."[5]

Despite several amendments to the constitution in the subsequent reporting period, no efforts have been made to incorporate economic, social and cultural rights into the fundamental rights chapter. The only insertion was made in 2025 through the twenty-sixth amendment, which added the right to a "clean, healthy and sustainable environment" (article 9A). It is welcome and significant that article 9A has been introduced as an "unqualified right", without caveats in the text, meaning the right must be prioritized above all competing considerations by state institutions.[6] Further, given the significant challenges Pakistan faces in terms of access to clean air[7] and climate change,[8] as well as its disproportionate impact on the economic and social rights of marginalized communities, the right is essential for meeting Pakistan's obligations under this

[1] Amnesty International, Pakistan: *"Cut us open and see that we bleed like them": Discrimination and stigmatization of sanitation workers in Pakistan*, 29 July 2025, https://www.amnesty.org/en/documents/asa33/0120/2025/en/.
[2] Amnesty International, *South Asia: Abandoned by fashion: The urgent need for fashion brands to champion workers' rights; Brand responses to Amnesty International survey*, 27 November 2025, https://www.amnesty.org/en/documents/asa04/8930/2025/en/.
[3] Amnesty International, *South Asia: Stitched up: Denial of freedom of association for garment workers in Bangladesh, India, Pakistan and Sri Lanka*, 27 November 2025, https://www.amnesty.org/en/documents/asa04/8929/2025/en/.
[4] Amnesty International, *Pakistan: Uncounted: Invisible deaths of older people and children during climate disasters in Pakistan*, 5 May 2025, https://www.amnesty.org/en/documents/asa33/9007/2025/en/.
[5] UN Committee on Economic, Social and Cultural Rights (CESCR), Concluding Observations: Pakistan, 20 July 2017, UN Doc. E/C.12/PAK/CO/1, para. 6.
[6] Human Rights Commission of Pakistan, *The Promise of Article 9A: Bridging constitutional rights and environmental governance*, 2025, https://hrcp-web.org/hrcpweb/wp-content/uploads/2020/09/2025-The-promise-of-Article-9A.pdf.
[7] Amnesty International, "Pakistan: Hazardous air puts lives at risk", 30 October 2019, https://www.amnesty.org/en/latest/news/2019/10/pakistan-hazardous-air
Amnesty International, "Pakistan: Hazardous air puts health of millions at risk" (Index: ASA 33/1370/2019), 20 November 2019, https://www.amnesty.org/en/documents/asa33/1370/2019/en
[8] Amnesty International, "Pakistan: Extreme weather: Searing heatwaves and torrential rains in Pakistan, and their impact on Pakistan" (Index: ASA 33/5828/2022), 8 July 2022, https://www.amnesty.org/en/documents/asa33/5828/2022/en

Covenant. However, at the time of reporting, little legislation, policymaking or rulings have taken place to operationalize this right since its insertion in the constitution.

## 2.1 RECOMMENDATIONS

Amnesty International recommends that Pakistan:

- Incorporate the rights recognized under the Covenant fully into domestic legislation and ensure their direct applicability and enforceability before all courts and tribunals.
- Review existing laws and constitutional provisions to ensure that economic, social and cultural rights are recognized as enforceable rights rather than solely as non-justiciable principles of policy.
- Provide regular and mandatory training for judges, prosecutors, lawyers and public officials on the Covenant and relevant CESCR jurisprudence.

# 3. NON-DISCRIMINATION (ARTICLE 2(2))

While the state party has taken steps to address discrimination on issues such as legal age of marriage, many other areas of law and policy remain inconsistent with the principle of non-discrimination. Pakistan continues to lack comprehensive legislation against discrimination. Article 25 of the Constitution states that all "citizens are equal before law and are entitled to equal protection of law", however many forms of discrimination remain explicitly unrecognized within this framework (see further below). Given that the constitution uses "citizenship" as a frame of reference for equality, discrimination on the basis of national identity has emerged as a major issue. Afghan nationals and refugees as well as stateless populations[9] who have been systematically denied citizenship for decades, such as Rohingya refugees and Bengali and Bihari migrants,[10] are denied essential rights such as access to education and healthcare due to this exclusion.[11]

Discrimination on grounds of caste identity and religion also remains unaddressed, leading to stigmatization of so-called "lower caste" communities, often Hindu and Christian, confining them to professions such as sanitation work and being used to justify violence against them. Amnesty International in its report, in partnership with the Center for Law & Justice (CLJ), on sanitation workers in Pakistan has noted that the country's laws and constitution do not recognize caste discrimination.[12] While articles 26 and 27 of the Constitution place safeguards against discrimination in access to public places and services on the basis of caste and religion, it does not adequately guard against caste and religious discrimination in employment and other aspects of life.

This lack of legal recognition has allowed for the perpetuation of discriminatory practices. Based on data collected from five government agencies in Punjab, Amnesty International found that in those organizations, Christians were disproportionately employed not only in lower grades but also specifically in sanitation positions.[13] It also found that despite the 2023 Supreme Court judgment in the case of Mubarik Ali Babar v Punjab Public Service Commission stating that discriminatory advertisements that include religion and caste as a job criteria and employment selection processes that restrict the minority job quota primarily to low-level posts was unconstitutional, data collected by CLJ showed at least 16 government job advertisements since 2023 included caste or religion as a criterion for recruitment.[14]

[9] Statelessness Encyclopedia Asia Pacific (SEAP), Statelessness Overview: Pakistan, 17 June 2025, https://seap.nationalityforall.org/region/regional-overview/south-asia/pakistan/#population
[10] UN Human Rights Committee (HRC), Concluding Observations: Pakistan, 2 December 2024, UN Doc. CCPR/C/PAK/CO/2, para. 28.
[11] Committee on the Rights of the Child (CRC), Concluding Observations: Pakistan, 5 February 2026, UN Doc. CRC/C/PAK/CO/6-7, para. 41-42.
[12] Amnesty International, *Pakistan: "Cut us open and see that we bleed like them": Discrimination and stigmatization of sanitation workers in Pakistan* (Index: ASA 33/0120/2025), 29 July 2025, https://www.amnesty.org/en/documents/asa33/0120/2025/en
[13] Amnesty International, *Pakistan: "Cut us open and see that we bleed like them* (previously cited), pp. 37.
[14] Amnesty International, *Pakistan: "Cut us open and see that we bleed like them* (previously cited), pp. 42.

The Ahmadiyya community in Pakistan face systematic discrimination at the hands of the authorities through discriminatory laws criminalizing their freedom of expression and freedom of belief and religion. Section 298 of the Pakistan Penal Code, 1860 disproportionately restricts Ahmadis from practicing their religious beliefs publicly. Religious discrimination is enshrined in the Constitution of Pakistan which declares Ahmadis to be non-Muslims through the second constitutional amendment and explicitly bars non-Muslims from becoming heads of state, President nor Prime Minister. Attacks against Ahmadi places of worship, burial sites and during Eid festivities[15] have been frequent.[16] These attacks are often perpetrated by religious groups; however, Amnesty International has documented that bans on public rites are sanctioned by local district administrations and police. Further, impunity for such attacks remains widespread. Targeted attacks against Ahmadis have resulted in deaths of at least four people in 2025 and 2026. Amnesty International has also noted that the system of discrimination impacts Ahmadis at every level, including matters such as registration of marriage,[17] and this discrimination has been upheld by the judicial system.[18] In September 2026, the Federal Constitutional Court upheld a ban on 23-volume Ahmadiyya publication,[19] stating that it was not a violation of right to freedom of religion under the constitution and that the right was not absolute.[20]

The state has consistently failed to hold perpetrators of violence against religious minorities to account. Amnesty International has noted that after the Jaranwala attacks against the Christian community in 2023,[21] in which allegations of blasphemy against two individuals led to the destruction of 20 churches and numerous homes, only 380 people were arrested out of the 5,213 suspects identified in several first information reports. Since then, only one man has been convicted in April 2025.[22] At least 23 have been acquitted due to lack of evidence.[23] On the other hand, a Christian man was sentenced to death for alleged blasphemy that was claimed to have sparked the riots.[24] A government report submitted to the Supreme Court in February 2026 noted that only 85 out of the 146 affected households were provided some compensation.[25]

Gender diverse people, particularly transgender individuals, are subject to discrimination on the basis of their gender identity. Legal protections provided under the Transgender Persons (Protection of Rights) Act, 2018 have been significantly rolled back in 2023 after a verdict from the Federal Shariat Court.[26] The judgment declared 'self-perceived identity' in relation to inheritance rights in the law to be 'incompatible' with the principles of Islam. The case has been appealed to the Supreme Court, however, has not been fixed for hearing and the status of the verdict and its impact on the act are currently in limbo. Significantly, gender-based violence against transgender individuals remains high. While no consolidated database of violent attacks exists, Gender Alliance Interactive (GIA) reports that 55 transgender people were killed in Sindh

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[15] Amnesty International, "Pakistan: End cyclical harassment and persecution of minority Ahmadiyya community", 5 June 2023, https://www.amnesty.org/en/latest/news/2025/06/the-ahmadis-deserve-to-practice-their-religion-and-celebrate-eid-without-fear-for-their-safety-and-liberty

[16] Office of the UN High Commissioner for Human Rights (OHCHR), "UN experts urge Pakistan to end persecution of Ahmadiyya community and uphold freedom of religion or belief", 7 September 2026, https://www.ohchr.org/en/press-releases/2026/09/un-experts-urge-pakistan-end-persecution-ahmadiyya-community-and-uphold

[17] Amnesty International, "Pakistan: Open Letter to Chief Minister of Punjab Maryam Nawaz to protect rights of Ahmadis" (Index: ASA 33/1026/2026), 21 May 2026, https://www.amnesty.org/en/documents/asa33/1026/2026/en

[18] Voicepk, "Ahmadi principal sentenced to life imprisonment by Chiniot court", 29 December 2025, https://voicepk.net/2025/12/ahmadi-principal-sentenced-to-life-imprisonment-by-chiniot-court

[19] Dawn, "Religious freedom subject to law, policy and morality: Federal Constitu-tional Court", 9 September 2026, https://www.dawn.com/news/2028467

[20] Pakistan, Muhammad Abdul Qadoos v Province of Punjab & others, Federal Constitutional Court, 8 September 2026, https://www.fccp.gov.pk/download/eyJpdiI6ImhvVnFrZWluOU96b3cwSnRybzQ3cFE9PSIsInZhbHVlIjoiWldVa2RXOFEvTkpLKzRqVW44dzJuQT09IiwibWFjIjoiNzkyZGFiYjdmYmE3MjI1YTM0M2MwNWQzMWNlZGUxZDAyMzUxOWY4OWMwNDVmMGIyMTIzYTRmNGE2OGY4MTJkNSIsInRhZyI6IiJ9, pp. 13.

[21] Amnesty International, "Pakistan: Authorities must ensure protection of minority Christian community", 16 August 2023, https://www.amnesty.org/en/latest/news/2023/08/pakistan-authorities-must-ensure-protection-of-minority-christian-community

[22] Dawn, "Jaranwala riots case: Man handed down death, 10-year term with Rs3m fine", 19 April 2025, https://www.dawn.com/news/1905124

[23] Dawn, "10 acquitted in Jaranwala church arson case", 5 June 2025, https://www.dawn.com/news/1915562
The Christian Post, "Judge sentences Muslim to prison for Jaranwala attacks on churches, acquits 13 others", 17 July 2026, https://www.christianpost.com/news/judge-sentences-muslim-to-prison-for-jaranwala-attacks.html

[24] Reuters, "Pakistani Christian man to appeal death sentence for blasphemy", 19 April 2025, https://www.reuters.com/world/asia-pacific/pakistani-christian-man-appeal-death-sentence-blasphemy-2025-04-19

[25] Express Tribune, "Three years on, Jaranwala victims still await justice", 19 August 2026, https://tribune.com.pk/story/2624665/three-years-on-jaranwala-victims-still-await-justice

[26] Amnesty International, "Pakistan: Revocation of rights of transgender and gender-diverse people must be stopped", 19 May 2023, https://www.amnesty.org/en/latest/news/2023/05/pakistan-revocation-of-rights-of-transgender-and-gender-diverse-people-must-be-stopped

province between 2022 and September 2025.[27] In September 2025, a committee consisting of "community elders" in Swabi, including members of political parties, influential community members and representatives of trader associations, declared that all transgender individuals be "expelled" from the district.[28] The committee did not have the lawful powers to implement its orders, however, it noted that if transgender individuals did not leave voluntarily, they would work with the police to implement their decision.[29] In the past, so-called "honour killings" and violence has been enacted at the behest of such community committees.[30] In August 2025, homes of transgender activists in Lahore were raided[31] after a criminal complaint for "obscenity" was filed based on videos disseminated online allegedly related to an entertainment event in Lahore.[32]

After hosting Afghan refugees for over 40 years, Pakistan's policy towards them has changed significantly since the 'Illegal Foreigners Repatriation Plan' was announced in September 2023.[33] Amnesty International has documented unlawful arrests, detentions, evictions and deportations of Afghan nationals from Pakistan,[34] accompanied by increased harassment and hostility. Those detained are taken to detention centres where they have little access to any legal representation or to their family members. In some cases, Afghan nationals have been arrested under the Foreigners Act, 1946 which allows for detention of foreigners deemed to have entered or stayed in the country illegally. As per data from the International Organization for Migration (IOM), the number of arrests and detentions of Afghan refugees and asylum seekers significantly increased from 10,566 in 2024 to 165,295 in 2025 and 81,609 in 2026 so far.[35] The repatriation plan, divided into three stages, targeted undocumented refugees and asylum seekers in its first phase and moved towards deporting Afghan Citizen Card holders in its second phase commencing in March 2025, which impacted approximately 800,000 Afghan nationals.[36] In June 2025, all UNHCR-issued Proof of Registration cards were deemed to have expired as the Pakistani authorities refused to renew their validity, leaving 1.4 million Afghan refugees without any valid documentation.[37] According to the IOM, 2,079,001 Afghan nationals have returned since September 2023 (2,079,001 in 2024, 783,736 in 2025, and 578,153 so far in 2026).[38]

Pakistan is not a state party to the 1951 Refugee Convention and has no domestic legislation governing the rights of refugees and asylum seekers. This lack of recognition has meant refugees inside Pakistan cannot access permits to work, and are thus pushed into informal sectors with lesser protections. Further, access to healthcare and education through public institutions is contingent on the possession of Computerised National Identity Card (CNIC) issued by National Database and Registration Authority (NARDA), which is also denied to refugees. Afghan refugees and asylum seekers – including children born to Afghan nationals in Pakistan – have no path to citizenship within Pakistan. Despite the fact that the Pakistan Citizenship Act, 1951 recognizes birthright citizenship obtaining citizenship is largely foreclosed to children of Afghan origin due to varying interpretations by local courts.[39] Nonetheless, some progress has been made in granting

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[27] Guardian, "'She narrowly escaped three bullets': Pakistan's trans community shaken by attacks and killings", 27 January 2026, https://www.theguardian.com/global-development/2026/jan/27/pakistan-transgender-attacks-killings

[28] Dawn, "Elders form body to 'expel' transgenders from Swabi", 14 September 2026, https://www.dawn.com/news/1941758/elders-form-body-to-expel-transgenders-from-swabi

[29] Express Tribune, "HRCP slams Swabi Jirga over transgender expulsion", 15 September 2025, https://tribune.com.pk/story/2566883/hrcp-slams-swabi-jirga-over-transgender-expulsion

[30] Amnesty International, "Pakistan: Authorities must end impunity of tribal councils as so-called "honour killings" continue unabated", 30 November 2023, https://www.amnesty.org/en/latest/news/2023/11/pakistan-authorities-must-intensify-pressure-to-end-impunity-of-tribal-councils-as-honour-killings-continue-unabated

[31] Amnesty International South Asia, Regional Office, X post, "PAKISTAN: Pakistani authorities must immediately end the shameful harassment and targeting of transgender activists in Lahore, 21 August 2026, https://x.com/amnestysasia/status/1958446559655551479

[32] Dawn, "Case dismissed against transgender persons held for organising 'objectionable' party in Lahore", 17 August 2025, https://www.dawn.com/news/1931465

[33] Amnesty International, "Pakistan: Government must not deport Afghan Refugees", 4 October 2023, https://www.amnesty.org/en/latest/news/2023/10/pakistan-government-must-not-deport-afghan-refugees

[34] Amnesty International, "Pakistan: Halt mass detentions and deportations of Afghan refugees", 10 November 2023, https://www.amnesty.org/en/latest/news/2023/11/pakistan-halt-mass-detentions-and-deportations-of-afghan-refugees

[35] IOM, *UNHCR-IOM FLASH UPDATE #111*, 17 September 2026, https://pakistan.iom.int/sites/g/files/tmzbdl1121/files/documents/2026-09/unhcr-iom-flash-update-111.pdf

[36] Amnesty International, "Pakistan: Opaque 'Illegal Foreigners Repatriation Plan' targeting Afghan refugees must be withdrawn", 26 March 2025, https://www.amnesty.org/en/latest/news/2025/03/opaque-illegal-foreigners-repatriation-plan-targeting-afghan-refugees-must-be-withdrawn

[37] Amnesty International, "Pakistan: Further Information: 1.4 million refugees need registration renewal" (Index: ASA 33/9519/2025), 20 June 2025, https://www.amnesty.org/en/documents/asa33/9519/2025/en

[38] IOM, *UNHCR-IOM FLASH UPDATE #111* (previously cited).

[39] Human Rights Commission of Pakistan (HRCP*), Who belongs? The Foreigners Act 1946 and Pakistan Citizenship Act 1951: A Legislative Review*, 2024, https://hrcp-web.org/hrcpweb/wp-content/uploads/2020/09/2024-Who-belongs.pdf, pp. 7.

citizenship rights. Pakistan Citizenship (Amendment) Act, 2026[40], passed on 25 March 2026, amended section 5 of the act to allow citizenship to be passed down by either parent, as opposed to just the "father" in earlier iterations of the act and clarifies that the amendment applies retroactively to 1951 when the original act was passed. These positive developments, however, are occurring alongside an increasing reliance on CNICs as a prerequisite for accessing a wide range of rights and services, such as housing and healthcare, relief programmes, education, employment, as well as the ability to engage in trade and conduct business, access bank accounts and make financial transactions, use telecommunications services, travel, and vote in elections. At the same time, the government has proposed the National Database and Registration Authority (Amendment) Bill, 2026[41] which allows for cancellation of CNIC cards for up to 60 days on broad grounds.[42] Given the growing dependence on CNICs for the enjoyment of fundamental rights and access to essential services, such powers risk exacerbating the exclusion of individuals who are unable to obtain or retain identity documentation.

Afghan students in Pakistan are also facing discrimination at the hands of the authorities. On 1 September 2026, the Pakistan Medical and Dental Council (PMDC), recalling "prevailing policy directions" regarding the return of Afghan nationals enrolled in medical or dental programs in Pakistan to Afghanistan, requested the educational institutions to proceed with "all necessary administrative formalities" regarding Afghan students, including the issuance of No Objection Certificates (NOCs). The vagueness of this notification resulted in various medical colleges issuing notices for Afghan students to vacate campuses, including hostel accommodation, and in some cases directing students to return to Afghanistan. The notification has been temporarily suspended by various high courts across the country,[43] which only provide temporary protection. The decision disproportionately impacted female students who would be denied access to higher education in Afghanistan amid the Taliban's ongoing gender persecution.

## 3.1 RECOMMENDATIONS

Amnesty International recommends that Pakistan:

- Adopt comprehensive anti-discrimination legislation prohibiting direct, indirect and intersectional discrimination in both public and private spheres and covering all prohibited grounds, including religion, belief, caste, sex, gender, gender identity, sexual orientation, disability, ethnicity, nationality and migration status, among others.
- Amend article 25 of the Constitution and all relevant legislation to ensure effective protection against discrimination in law and practice.
- Repeal or amend laws and policies that directly or indirectly discriminate against religious minorities, particularly against Ahmadis.
- Take effective measures to prevent, investigate, prosecute and punish violence and attacks against religious minorities, including attacks on places of worship and community property.
- Ensure equal access to employment, education, housing, healthcare and social protection for religious minorities, gender diverse people, particularly transgender people, persons with disabilities, refugees, scheduled caste communities and other marginalized groups.
- Restore provisions of the Transgender Persons (Protection of Rights) Act 2018, granting legal gender recognition based on self-determination principle, while preserving the rights

[40] Pakistan, Pakistan Citizenship (Amendment) Act, 2026, Act No. XXVII of 2026, 25 March 2026, https://www.na.gov.pk/uploads/documents/69ccf33119e8e_822.pdf.
[41] Pakistan, National Database and Registration Authority (Amendment) Act, 2026, 3 March 2026, https://senate.gov.pk/uploads/documents/1772532181_243.pdf.
[42] Amnesty International, "Pakistan: Amnesty International calls for the rejection of the Bill to amend Section 18 of the National Database and Registration Authority Ordinance 2000" (Index: ASA 33/1084/2026), 19 June 2026, https://www.amnesty.org/en/documents/asa33/1084/2026/en
[43] Dawn, "LHC suspends PMDC's return orders for Afghan medical students", 11 September 2026, https://www.dawn.com/news/2029083
Express Tribune, "PHC stays deportation of Afghan medical students", 21 September 2026, https://tribune.com.pk/story/2630598/phc-stays-deportation-of-afghan-medical-students
Dawn, "IHC allows Afghan doctor to continue post-grad training", 16 September 2026, https://www.dawn.com/news/2030258
Dawn, "SHC suspends PMDC's return orders for Afghan medical students", 14 September 2026, https://www.dawn.com/news/2029882

to privacy and health, including access to healthcare and medical services for gender diverse persons including transgender individuals without discrimination, in alignment with international human rights laws and standards.

- Ratify the 1951 Refugees Convention and its 1967 Protocol.
- Formally suspend the 'Illegal Foreigners Repatriation Plan' in line with Pakistan's international legal obligations, including the principle of non-refoulement, and develop a comprehensive national legal framework for asylum and other forms of international protection in line with international refugee law.
- Amend the Foreigners Act to prevent penalization of refugees and asylum seekers entering and residing in Pakistan.
- Create well-resourced and accessible pathways for the registration of refugees, taking proactive measures to expedite the registration of refugees particularly at risk, including but not limited to women and girls, journalists, and those belonging to minority and ethnic communities, and those facing barriers due to gender identity, sexual orientation, disability, language, among others.

# 4. RIGHT TO JUST AND FAVORABLE CONDITIONS OF WORK (ARTICLE 7)

Pakistan's labour force faces a number of issues with regard to just and favourable work conditions. However, this submission will focus on some sectors as evidence of wider systemic issues. Amnesty International's report on sanitation workers noted that they faced extremely precarious working conditions. Firstly, despite the permanent nature of sanitation work, government bodies across Pakistan have increasingly avoided regularizing sanitation workers by putting them on temporary contracts, thereby denying them job security, benefits and legal protections.[44] Workers were regularly paid below minimum wage, particularly daily wage workers because employers are able to sidestep legal obligations due to the lack of regularization.[45] In July 2026, a sanitation worker, employed by the provincial government's Suthra Punjab project, died from self-immolation protesting the non-payment of his full salary.[46] Sanitation workers are also required to work in extremely hazardous and dangerous conditions. In December 2025, the Islamabad High Court directed the federal government to immediately implement protective measures for those working in sewerage, including functional protective gear, gas detectors, ventilation arrangements and first-aid facilities.[47] These court orders have not been implemented as in 2026 alone, so far, Amnesty International has documented deaths of at least 23 sanitation workers who have died while manually cleaning sewer pipelines and inhaling hazardous gases. Workers are often not provided protective equipment, and even when such equipment is provided it is very basic.[48]

In the past year, legislative proposals such as the Punjab Waste and Sanitation Workers (Dignity, Safety, Security and Welfare) Bill, 2026 and Prohibition of Manual Scavenging and Protection of Sanitation Workers (ICT) Bill, 2025 have been presented in the Punjab Assembly[49] and National Assembly[50] respectively. While this is welcome progress, these Bills remain merely proposals and still require to be passed after genuine and inclusive consultation with all key stakeholders including civil society.

Amnesty International's report on garment sector workers in South Asia found that these workers in Pakistan are paid poverty wages, face long working hours, precarious working arrangements

[44] Amnesty International, *Pakistan: "Cut us open and see that we bleed like them"* (preciously cited), pp. 44.
[45] Amnesty International, *Pakistan: "Cut us open and see that we bleed like them"* (preciously cited), pp. 54.
[46] Dawn, "Suthra Punjab worker dies two days after setting himself ablaze", 4 July 2026, https://www.dawn.com/news/2012800
[47] Dawn, "IHC issues order on Christian sanitary workers' rights", 10 December 2025, https://www.dawn.com/news/1960264
[48] Amnesty International, *Pakistan: "Cut us open and see that we bleed like them"* (preciously cited), pp. 60.
[49] Dawn, "Bill seeking security, dignity for sanitary workers tabled in PA", 2 September 2026, https://www.dawn.com/news/2026758
[50] National Assembly of Pakistan National Assembly of Pakistan, "Private Member's Bills laid in NA", https://www.na.gov.pk/en/bills.php?type=2.

and gender-based violence and harassment.[51] In Pakistan, many employers fail to pay even the minimum wage. Similar to sanitation workers, garment sector workers are further exploited through informalization of their work and short-term employment contracts. The research found that even when regulation was passed to prohibit the use contract or agency labour to perform production work, such as the Sindh Factories Act, 2015, contracted labour continued to be used widely.[52]

## 4.1 RECOMMENDATIONS

Amnesty International recommends that Pakistan:

- Extend labour protections, minimum wage guarantees, occupational safety standards and social protection to non-regularized workers and those in the informal economy, including domestic workers, home-based workers, agricultural workers and platform workers. Ensure regular and adequate labour inspections of workplaces, particularly by providing adequate resources to labour departments and all relevant authorities to carry out these inspections effectively.
- Immediately take steps towards regularizing eligible workers in line with international human rights and labour law standards and ensure mandatory requirements on employers to provide written contracts for all workers.
- Prohibit and effectively address discriminatory hiring practices and workplace discrimination based on religion, caste, ethnicity, disability, sex, gender, gender identity, sexual orientation, or other status.
- Eliminate manual scavenging and cleaning of drains and gutters and introduce machines to perform these tasks while ensuring that sanitation workers are employed to run and maintain these machines without directly coming in contact with chemicals, excreta and household waste. Provide existing sanitation workers employed in the manual cleaning of drains and gutters with training and skills to operate these machines.
- Implement government-mandated minimum wage for all workers, regardless of their employment status and strengthen measures for oversight and inspections to ensure effective implementation and to ensure that no unlawful deductions take place. The authorities must take steps to address the gender pay gap in line with its obligations under CEDAW.

# 5. RIGHT TO JUST AND FAVORABLE CONDITIONS OF WORK (ARTICLE 7)

The right to freedom of association within the workplace is severely restricted in Pakistan. The rate of unionization in Pakistan is extremely low, at 4.7% as per the last available data from 2016 by the International Labour Organization (ILO).[53] Since the eighteenth amendment to the constitution in 2010, labour has become a provincial subject, and thus trade unions are governed by provincial frameworks. In Balochistan, for instance, the introduction of a new registration framework under the Balochistan Charities and Regulation Authority (BCRA) under the Balochistan Charities Act of 2019 has led to the cancellation of registration of 62 trade unions in 2019[54] and 10 employee associations in 2025[55]. The government has also used the Pakistan Essential Services (Maintenance) Act, 1952 to prohibit all forms of union activities within the

[51] Amnesty International, *South Asia: Stitched up: Denial of freedom of association for garment workers in Bangladesh, India, Pakistan and Sri Lanka* (Index: ASA 04/8929/2025), 27 November 2025, https://www.amnesty.org/en/documents/asa04/8929/2025/en/.
[52] Amnesty International, "South Asia: Stitched up" (previously cited), pp. 81.
[53] International Labour Organization, ILOSTAT: Pakistan, https://ilostat.ilo.org/data/country-profiles/pak/.
[54] Dawn, "Registration of 62 trade unions cancelled in Balochistan", 19 July 2019, https://www.dawn.com/news/1494962
[55] Dawn, "Registration of worker associations cancelled in Balochistan", 20 January 2025, https://www.dawn.com/news/1886456

energy sector, in January 2024[56] and then in July 2026[57] to prevent protests against proposals to privatize the power and energy sector. Amnesty International's research on garment sector workers found that there are severe restrictions on their right to form and join trade unions. Anti-union discrimination was common, as many reported being threatened and harassed by management in relation to union activities.[58]

The Industrial Relations Act, 2012 allows employers or the authorities to shut down, prohibit, limit or stop a strike if it continues for over 30 days or if authorities are "satisfied that the continuance of such a strike is causing serious hardship to the community or is prejudicial to the national interests". Workers can be replaced during a strike, which can disincentivize workers from taking collective action. Additionally, the Industrial Relations Ordinance, 1968 penalizes "misconduct", which includes "striking work or inciting others to strike in contravention of the provisions of any law, or rule having the force of law". Criminal cases have also been brought against labour organizers. In January 2026, Iqbal Abro, a leader of the National Trade Union Federation, was forcibly disappeared for four days and was subsequently charged under Pakistan's Anti-Terrorism Act, 1997 for allegedly "extorting" money from factory owners.[59]

Student unions remain banned in Pakistan and political activity in educational institutions and campuses remains severely restricted. Student unions were banned in February 1984[60] under the military regime of General Zia ul Haq. After a brief lifting of the restriction in 1989, the ban was reinstated by the Supreme Court in 1993 which mandates the signature of an affidavit disavowing any political activity as a precondition for university admission.[61] The Sindh Students Union Bill, 2019 was passed by the provincial assembly in Sindh on 11 February 2022[62] and assented into law in March 2022.[63] However, the law has not been implemented. In January 2026, the Sindh High Court dismissed[64] a petition to allow student union elections at Karachi University.[65]

## 5.1 RECOMMENDATIONS

Amnesty International recommends that Pakistan:

- Amend federal and provincial labour legislation to fully guarantee the rights to freedom of association, collective bargaining and strike in accordance with international human rights and labour standards.
- Remove legal and administrative barriers that restrict the formation, registration and operation of trade unions.
- Ensure that all workers, including agricultural workers, domestic workers, home-based workers, informal economy workers and platform workers, are able to form and join trade unions of their choosing.
- Protect workers, trade unionists and labour rights defenders from retaliation, dismissal, harassment, violence, surveillance and criminalization for exercising their labour rights.

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[56] Business Recorder, "Ban on unions in energy cos: PSI seeks ILO's intervention", 26 March 2024, https://www.brecorder.com/news/amp/40295492
Express Tribune, "Govt's move to ban power sector union activities censured", 17 January 2024, https://tribune.com.pk/story/2453513/govts-move-to-ban-power-sector-union-activities-censured
[57] The Nation, "Union activities in power entities banned to prevent possible protests against privatization", 21 July 2026, https://www.nation.com.pk/21-Jul-2026/union-activities-power-entities-banned-prevent-possible-protests-privatisation
[58] Amnesty International, *Pakistan: "Cut us open and see that we bleed like them*" (previously cited), pp. 43.
[59] Voicepk, "Labour leader Iqbal Abro's arrest sparks human rights outcry", 16 January 2026, https://voicepk.net/2026/01/labour-leader-iqbal-abros-arrest-sparks-human-rights-outcry
[60] Pakistan, Martial Law Order No. 1371, 1984 (repealed by The Martial Law Order No. 1371 (Repeal) Act, Pb. Act VI, 1989, http://punjablaws.gov.pk/laws/374.html.
[61] Supreme Court of Pakistan, M. Ismail Qureshi and others v. M. Awais Qasim, Secretary General, Islami Jamiat Tulba, Pak, 1993 SCMR 1707, 1993.
[62] Express Tribune, "Sindh Student Union Bill passed", 12 February 2022, https://tribune.com.pk/story/2343152/sindh-student-union-bill-passed
[63] Pakistan, Sindh Students Union Act, 2019, Sindh Act No. I of 2022, 9 March 2022, https://sindhlaws.gov.pk/setup/publications_SindhCode/PUB-NEW-23-000071.pdf.
[64] Sindh High Court, Taimoor and others v Province of Sindh, Pak, C.P No.D-2555 of 2024, 28 January 2026, https://caselaw.shc.gov.pk/caselaw/view-file/MzA0MDUzY2Ztcy1kYzgz.
[65] Dawn, "Sindh High Court dismisses plea seeking student union elections at Karachi University", 28 January 2026, https://www.dawn.com/news/1969531

- Investigate and prosecute acts of anti-union discrimination and interference by employers and state authorities, and ensure effective remedies, including reinstatement and compensation, for workers subjected to anti-union reprisals.
- Pass legislation to lift the ban on student unions throughout the country and take measures to ensure an enabling environment for student unions.

# 6. RIGHT TO HEALTH (ARTICLE 12)

Access to adequate healthcare in Pakistan is often contingent on economic class and financial means, as the public healthcare system is under enormous strain. There is a chronic shortage of medical equipment and qualified healthcare professionals within the system. Pakistan has about one physician for every 1,000 people.[66] As per the World Health Organization (WHO), Pakistan spent 2.52% of its GDP on healthcare in 2023.[67] In its concluding observations, the Committee showed concern at the "very low level of public funding allocated to the health sector"[68] and recommended that Pakistan "make every effort to increase public expenditure in the health sector".[69] Since its last review in 2017, Pakistan's spending on health as a portion of its GDP has remained largely unchanged, under 3%, and well below the global average (around 10%).[70]

Amnesty International's research on the right to health in the context of climate-related disasters has shown that the healthcare system is ill-equipped to deal with such situations.[71] Pakistan is the fifth-most vulnerable country to climate disasters and is extremely vulnerable to heatwaves and flooding across the country.[72] According to the WHO, 2,000 health facilities in Pakistan – or 13% of the total – were damaged or destroyed in the 2022 floods.[73] Destruction of essential infrastructure such as roads also makes access to healthcare facilities extremely difficult. Amnesty International's research has found that the strain on the healthcare system particularly impacts older people and young children.[74]

Amnesty International's research also indicated that the death toll from climate-related disasters was immensely underestimated due to gaps in recording of deaths from climate change-induced causes. As per the Pakistan government's own estimates, fewer than 5% of deaths are captured in official records.[75] It was also found that data from Provincial Disaster Management Authorities filed to comprehensively capture the full scope of climate disasters as the data focused largely on sudden deaths, as opposed to deaths from water-borne diseases.[76] Additionally, low birth registration rates make it difficult to register deaths for young children.[77]

Pakistan is also vulnerable to extremely high temperatures[78]; however, the healthcare system is largely inadequate for dealing with heat-related health issues. Amnesty International found that while local authorities issue advisories and institute "cooling centres", these remained inaccessible to many.[79] During heatwaves in 2024 in Karachi, hospitals were overwhelmed by the number of people seeking care, and smaller primary and secondary care facilities were unequipped to take on patients, funnelling them all towards the major tertiary hospitals.[80] In its research on the 2021 and 2022 heatwaves, Amnesty International found that those living in

[66] WHO, The Global Health Observatory: Global Health Workforce statistics database (accessed 22 September 2026), https://www.who.int/data/gho/data/themes/topics/health-workforce
[67] World Bank, Global Health Expenditure Database (accessed 22 September 2026), https://data.worldbank.org/indicator/SH.XPD.CHEX.GD.ZS
[68] CESCR, Concluding Observations: Pakistan (previously cited), para. 75
[69] CESCR, Concluding Observations: Pakistan (previously cited), para. 76.
[70] World Bank, Current health expenditure (% of GDP) (accessed 29 September 2026), https://data360.worldbank.org/en/indicator/WB_WDI_SH_XPD_CHEX_GD_ZS?country=PAK&minYear=2017.
[71] Amnesty International, *Pakistan: Uncounted: Invisible deaths of older people and children during climate disasters in Pakistan*, 5 May 2025, https://www.amnesty.org/en/documents/asa33/9007/2025/en/.
[72] Germanwatch, Global Climate Risk Index 2021, https://www.germanwatch.org/en/19777, p.13.
[73] World Health Organization, *WHO's Health Emergency Appeal 2023*, https://iris.who.int/bitstream/handle/10665/365635/WHOWHE-EXR-2023.1-eng.pdf?sequence=1, p.172.
[74] Amnesty International, *Pakistan: Uncounted* (previously cited), pp. 31, 40, 42, 72.
[75] Amnesty International, *Pakistan: Uncounted* (previously cited), pp. 35.
[76] Amnesty International, *Pakistan: Uncounted* (previously cited), pp. 37.
[77] Amnesty International, *Pakistan: Uncounted* (previously cited), pp. 38.
[78] Amnesty International, *Pakistan: A burning emergency: Extreme heat and the right to health in Pakistan*, 4 June 2023, https://www.amnesty.org/en/documents/asa33/6823/2023/en/.
[79] Amnesty International, *Pakistan: Uncounted* (previously cited), pp. 64.
[80] Amnesty International, *Pakistan: Uncounted* (previously cited), pp. 65.

poverty and working in the informal sector were most severely impacted by the extreme temperatures. Labourers whose work required them to be outdoors for long periods, such as agricultural workers, labourers in brick kiln factories, delivery riders, police officers, and sanitation workers, experienced heat-related stresses.[81] Pakistan has committed to adopt a Pakistan Cooling Action Plan (PCAP) by 2026, though at the time of making this submission no plan has been finalized nor made public.

## 6.1 RECOMMENDATIONS

Amnesty International recommends that Pakistan:

- Annually increase public investment in healthcare and allocate sufficient human, technical and financial resources to ensure the availability, accessibility and quality of healthcare services throughout the country, particularly in rural, remote and climate-vulnerable areas.
- Develop and implement a climate-resilient health system strategy that integrates climate adaptation into healthcare planning, infrastructure development, emergency preparedness and service delivery, with particular attention to populations at heightened risk, including children, older persons, persons with disabilities and communities living in poverty.
- Ensure that all health facilities are adequately equipped and resourced to respond effectively to climate-related disasters, including floods, extreme heat events and disease outbreaks, and prioritize the restoration and strengthening of healthcare infrastructure damaged by climate disasters.
- Establish comprehensive systems for collecting, recording and publishing disaggregated data on mortality and morbidity associated with climate-related disasters, including indirect deaths resulting from heat stress, malnutrition, displacement, water-borne diseases and interruptions in access to healthcare.
- Ensure that heat action plans are adequately funded and include accessible cooling centres, early warning systems, public awareness measures, emergency medical response mechanisms and strengthened primary healthcare services during periods of extreme heat.

[81] Amnesty International, *Pakistan: A burning emergency* (previously cited), pp. 18.