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JOINT STAFF WORKING DOCUMENT

The EU Special Incentive Arrangement for Sustainable Development and Good Governance (GSP+) assessment of the Islamic Republic of Pakistan covering the period 2023-2025

Accompanying the document

**Joint Report to the European Parliament and the Council
on the Generalised Scheme of Preferences covering the period 2023-2025**

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1. Executive Summary

Pakistan has benefited from the EU's Special Incentive Arrangement for Sustainable Development and Good Governance (GSP+) since 2014, remaining its largest beneficiary with EUR 7.5 billion in GSP+ eligible exports to the EU in 2024 (primarily textiles and clothing) and an estimated EUR 732 million in tariff exemptions in 2024 alone. Despite this trade success, economic fragility persisted, exacerbated by climate vulnerabilities and negative political developments.

During the 2023-2025 monitoring period, Pakistan has been facing compliance issues with its GSP+ obligations. It has regressed in a number of areas while positive change was limited. Notable progress included legislation to create a National Commission for Minorities, a reduction in the scope of the death penalty, the continuation of the de facto moratorium on executions, and the adoption of implementing rules of the Anti-Torture Act. Other legislative advances include a Domestic Violence Bill for Islamabad. A first marital rape conviction was an important milestone. The National Commission for Human Rights (NCHR) has become, together with the Ministries of Law and Justice as well as Human Rights, a key actor in Pakistan's efforts to respect, protect and fulfil human rights obligations. Labour rights saw progress with the ratification of ILO Protocol of 2014 to the Forced Labour Convention, 1930 and expanded monitoring mechanisms, but overall enforcement remains weak. New action plans to address child labour have been adopted, but child labour rates are only slowly decreasing. In general, most progress is of legislative and administrative nature and needs to be translated into real improvements on the ground.

Significant concerns remained, generally impacting the rule of law and civil society space. Enforced disappearances and extrajudicial killings increased, without accountability for perpetrators. Freedom of expression deteriorated due to further amendments to cybercrime, anti-terrorism and blasphemy laws, allowing for vague provisions to be used against dissidents, human rights defenders, journalists, minorities and ordinary citizens. This includes criminal and administrative procedures that may result in imprisonment, financial confiscation or denial to travel abroad. Recent constitutional amendments have been criticised for further undermining judicial independence. This compounds with issues like obstacles to fair trial and access to justice. Forced labour continued to affect too many.

To ensure further GSP+ eligibility and compliance with international commitments, including in view of the revised GSP rules as of 2027, key priorities for future engagement include: ensuring accountability for human rights violations; increased efforts against torture; in-prison and capital punishment reforms; reversing negative developments in relation to enforced disappearances and violations of freedom of expression; effectively addressing violence against women; securing children's access to education; ending child marriage; effectively implementing the newly established action plans of provinces and territories to eliminate child labour; stepping up the enforcement of existing laws against forced labour; restraining discrimination of minorities; strengthening the independence, impartiality, and operational capacity of anti-corruption bodies at federal and provincial levels.

2. Key Developments

2.1 Political and economic developments

Pakistan's fragile political structure, including the complex federal set-up and imbalances between provinces, as well as the role of the military in politics and the economy, created a significant challenge to the country's development, as did escalating security concerns stemming from domestic militancy, terrorism as well as conflict with neighbouring countries.

Pakistan was involved in a brief but intense military conflict with India in May 2025. Relations with Afghanistan have been very tense since October 2025, leading to the closure of the border between the two countries, occurrences of terrorist attacks originating from Afghan soil and Pakistani airstrikes into Afghan territory.

Pakistan's political landscape during the 2023-2025 monitoring cycle¹ was shaped by persistent complaints about the integrity of the 2024 electoral process, harsh measures against opposition party leaders and supporters, and further increased military influence.

Economically, Pakistan avoided a debt default in July 2023 after facing severe pressure on external payments, minimal foreign exchange reserves, import restrictions, record-high inflation, and negligible growth. The World Bank estimates that 47.2 % of Pakistan's population lived in poverty in 2025². Devastating floods in 2022 and 2025 had negative economic and social impact. The country is ranked on top of the Global Climate Risk Index (2024).

2.2 GSP+ trade impact

Compared to the previous period, EU imports from Pakistan in 2022–2024³ remained high, peaking at EUR 9.4 billion in 2022, then falling to EUR 7.9 billion in 2023 and rebounding to EUR 8.3 billion in 2024, reflecting a broader slowdown in EU demand⁴.

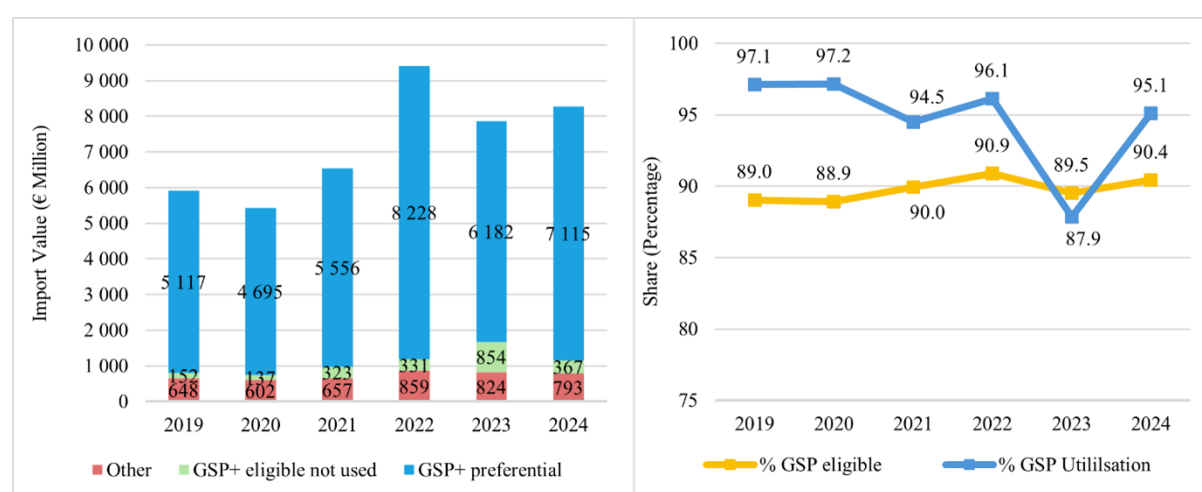
Pakistan remained the largest GSP+ beneficiary, and the EU its main export market, accounting for 28 % of its total exports, with textiles and clothing making up roughly 70–76 % of the country's exports to the EU in 2024. On the import side, the EU ranks sixth among Pakistan's suppliers, with imports valued at EUR 2.7 billion, well behind China, which is Pakistan's largest supplier with imports reaching EUR 14.7 billion in 2024.

From 2022 to 2024, about 90 % of EU imports from Pakistan were GSP+-eligible, with a utilisation rate averaging 93 % and rebounding to 95 % in 2024 after an exceptional dip in 2023 driven by supply-chain disruptions and weaker demand in clothing and home textiles. As a result of GSP+, Pakistan benefited from around EUR 732 million in tariff exemptions in 2024. This corresponds to around 9 % of Pakistan's export value to the EU in 2024.

Figure 1. EU imports from Pakistan and GSP+ utilisation rate, 2019-2024

Indicators	2019	2020	2021	2022	2023	2024	Annual Growth (2022-2024)
Total imports, (EUR million)	5 917.4	5 434.0	6 534.9	9 418.0	7 860.7	8 275.0	-6.3 %
GSP+ eligible, (EUR million)	5 268.9	4 832.4	5 878.4	8 559.4	7 036.5	7 482.0	-6.5 %
GSP+ used, (EUR million)	5 116.8	4 695.4	5 555.7	8 228.2	6 182.3	7 115.0	-7.0 %
Share of GSP+ eligible in total	89.0 %	88.9 %	90.0 %	90.9 %	89.5 %	90.4 %	
GSP+ utilisation rate	97.1 %	97.2 %	94.5 %	96.1 %	87.9 %	95.1 %	
MFN=0 % imports, (EUR million)	372.1	317.6	333.1	453.0	377.4	336.7	-13.8 %
Share of MFN=0 % imports	6.3 %	5.8 %	5.1 %	4.8 %	4.8 %	4.1 %	

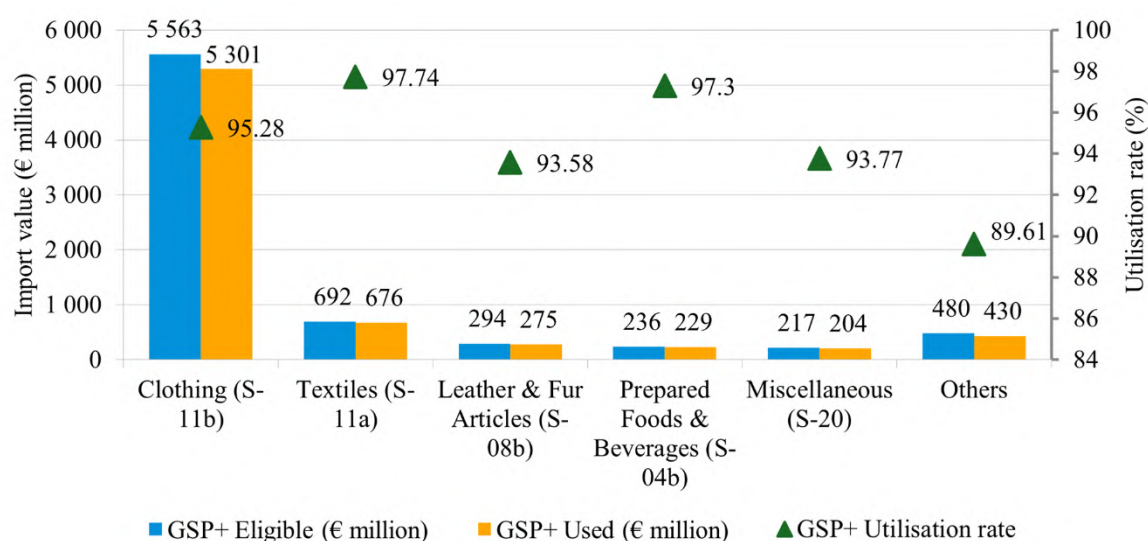
Figure 2. EU imports from Pakistan by trade regime and utilisation rates, 2019-2024



The sectors⁵ benefiting most from GSP+ preferences in 2024 were (in order of significance) clothing (S-11b), textiles (S-11a), leather & fur articles (S-08b), prepared foods & beverages (S-04b) and miscellaneous manufactures (S-20). These sectors have dominated Pakistan's export basket under GSP+ products to the EU and continue to underpin the country's comparative advantage in labour-intensive manufacturing exports.

Clothing accounts for a large share of total exports and GSP+ preference utilisation (95.3 %), underscoring Pakistan's dependence on preferential market access for these products in its EU trade. The top five export sectors to the EU all achieved preference utilisation rates of 93.6 %-97.7 % in 2024. As Pakistan's exports to the EU are highly concentrated, its trade performance is exposed to sector-specific shocks (energy prices, compliance costs, demand cycles).

Figure 3. Top product groups benefiting from GSP+ tariff preferences for Pakistan, 2024



On 19 June 2025, due to the serious disturbance in the Union market, the Commission adopted a safeguard measure under Article 30 of the GSP Regulation, suspending Pakistan's GSP+ preferences for imports of non-fuel ethanol for two years, from 21 June 2025 to 20 June 2027⁶.

3. Compliance with GSP+ obligations

Pakistan has maintained ratification of all 27 GSP+ relevant conventions and has issued no new⁷ reservations. Although Pakistan was largely compliant with its reporting obligations to the monitoring bodies during the reporting period (see Annex), it does not have a system in place to effectively follow up on treaty bodies' concluding observations and shows only limited engagement with UN Special Procedures⁸.

This section is based on the latest UN monitoring body reports and supplemented with information from civil society. Pakistan has continuously engaged with the EU's GSP+ monitoring process through regular exchanges of information, including during the monitoring mission in November-December 2025.

3.1 Human Rights

During the reporting period, Pakistan made progress in consolidating the institutional framework for human rights. The **National Commission for Human Rights (NCHR)** obtained 'A status' accreditation with the Global Alliance of National Human Rights Institutions (GANHRI) in 2024. Concerns in terms of continuity of the NCHR as its mandate came to an end without appointment of new commissioners were partially addressed by the extension of the mandate of the current chairwoman. Besides NCHR, the National Commission on the Rights of the Child (NCRC) and the National Commission on the Status of Women (NCSW) remained actively engaged in addressing violations of rights and provisions thereof⁹, yet delays in the confirmation of new leadership remains a concern¹⁰. The establishment of the **National Commission for Minorities** under the Ministry of Human Rights, following the approval of the relevant bill at the end of 2025, would be an important step in Pakistan's efforts in protecting religious minorities, although only non-Muslims are formally defined as minorities under Pakistani legislation¹¹.

During the reporting period, Pakistan also made progress in aligning some of its legislation and policies with international human rights standards. Four crimes were taken out of the scope of **capital punishment**¹², moving further towards the principle of death penalty to be limited to the ‘most serious crimes’ in line with the International Covenant on Civil and Political Rights (ICCPR). No executions have taken place since December 2019. While the revised mercy petition procedure still does not fully meet international standards, as it excludes entire categories of offenses and lacks procedural safeguards, the presidential clemency granted in October 2025 was a significant first step. Important efforts have been made to reduce the backlog of pending appeals in the Supreme Court.

Pakistan has made efforts to improve **prison conditions**, namely through a National Prison Reform Action Plan and a dedicated Task Force, as well as training programmes and a grievance helpline. Its implementation was further advanced in April 2026 through review by the National Judicial (Policy Making) Committee and formal endorsement by justice committees in Punjab, Sindh and the Islamabad Capital Territory. However, serious problems of overcrowding, poor conditions, and high rates of pre-trial detention persist. Efforts to align drug policy with human rights principles and implement evidence- and rights-based reforms are to be pursued further.

The adoption of the **Domestic Violence (Prevention and Protection) Bill** for Islamabad Capital Territory (ICT)¹³, completing existing legislation in the four provinces, is particularly pertinent given the persistent high level of **violence against women and girls**, including murder, rape, kidnapping, honour killings and domestic violence, as well as the insufficient level of assistance for victims and the extremely low level of convictions for those crimes¹⁴. A first conviction for marital rape in February 2024 in Sindh province was another important and symbolic step in the implementation of the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). Other relevant initiatives include the launch of a National Strategy on Technology-Facilitated Gender-Based Violence, aimed at strengthening prevention, reporting and redress mechanisms for online violence against women and vulnerable groups.

Significant steps towards compliance with the Convention on the **Rights of the Child** (CRC) include the abolition of child marriage for Christian communities through the Christian Marriage (Amendment) Act 2024; the legislation to **criminalise child marriages** in Islamabad and in Balochistan, passed in May 2025 and in November 2025 respectively, as well as the Punjab Child Marriage Restraint Ordinance in February 2026¹⁵.

With relevance to the International Covenant on Economic, Social and Cultural Rights, Pakistan considerably expanded its **social protection** system over the last decade and in the last years, providing direct benefit for many of the most vulnerable citizens. At the same time, forced evictions in some places remain a concern. Spending on health increased at a rate comparably lower than most other sectors. The Prime Minister announced a nationwide education emergency in 2024 to address out-of-school rates and raise literacy rates, following which a National Education Emergency Action Plan was approved. Provinces have reported progress, including the reopening of previously non-functional schools, recruitment of teachers, and expansion of education infrastructure. An enrolment campaign in the Islamabad Capital Territory was launched, targeting the enrolment of 25 000 – 30 000 out-of-school children¹⁶.

Despite these positive developments, grave concerns remain as significant systemic challenges persisted in the implementation of human rights conventions, with a deterioration of the situation relating in particular to enforced disappearances, minority rights¹⁷, freedom of media and freedom of expression and peaceful assembly. Impunity for human rights violations continues to be of major concern. The European Commission has received a Single-Entry Point (SEP) complaint in relation to Pakistan in 2025.

Reports point to a high and growing number of cases of **enforced disappearances**¹⁸, especially in the provinces of Balochistan and Khyber Pakhtunkhwa (KPK), as well as of extrajudicial executions¹⁹. The Commission of Inquiry on Enforced Disappearances has been ineffective in ascertaining the whereabouts of disappeared persons or ensuring accountability for perpetrators²⁰. There has not been any prosecution for enforced disappearances to date. The Commission closed over 9 000 cases to date, without finding evidence for involvement of state agents in any of them. When a case is closed because the victim is considered ‘returned home’ or dead, the Commission does not record the fate of the individuals during the time of their disappearance. Pakistan has compensated some families of victims of enforced disappearances, albeit without clear procedural framework to a limited extent. Pakistan indicated that it was not planning to pass specific legislation against enforced disappearances¹, arguing that existing laws already extensively criminalise such acts.

Recent amendments to the **Anti-Terrorism Act** and related legislation in Balochistan and Punjab²¹ appear to authorise preventive, arbitrary detention without charge or trial and without meaningful judicial review or effective remedies. Together with other legislation such as the Actions (in Aid of Civil Power) Regulation, this risks blurring the line between legitimate law enforcement measures and enforced disappearances, and being used in a discriminatory or disproportionate manner against persons belonging to minority groups, political dissidents, human rights defenders, journalists, students and family members of victims²².

The implementation rules of the **Torture and Custodial Death (Prevention and Punishment) Act**, approved in November 2025, notwithstanding several shortcomings, including in the act itself²³, was an important step in efforts to curb the widespread practice. The government has started training law enforcement and judicial officials. As regards complaints, investigations and prosecution of torture cases, data provided by the government is, however, yet to show a clear trend. Concerns also remained regarding the use of evidence obtained under torture in court proceedings²⁴.

Political rights are negatively affected among others by abusive judicial proceedings, and detention of opposition supporters and leaders, including of a former Prime Minister, with concerns in terms of fair trial and detention conditions, including in relation to access to lawyers, visitors and medical assistance²⁵. Military trials do not meet the requirements of ICCPR Article 14 which stipulates the right to a fair and public trial, in a court that is independent, impartial and competent, and to adequate and effective legal representation.

During the reporting period, limitations to the **freedom of expression** and access to information remained serious and persistent. Despite the adoption of the Protection of Journalists and Media Professionals Act, Pakistan’s media freedom deteriorated further²⁶ with the working environment for journalists growing increasingly hostile and dangerous, including cases of

¹ Despite repeated recommendations by UN Treaty Bodies including in CAT and ICCPR reviews.

reported intimidation, administrative and judicial harassment and violence against journalists covering sensitive topics. Targeted litigation (strategic lawsuits against public participation, SLAPPs) is sometimes employed to prevent journalists and lawyers from doing their work. Legislation such as the Pakistan Electronic Crimes Act (PECA) and the criminal defamation, blasphemy, sedition and counter-terrorism laws, contain vague concepts of hate speech, defamation, terrorism and false news²⁷. Without effective safeguards against abuse, the enforcement of these laws has a significant chilling effect on dissidents, journalists, human rights defenders and individuals belonging to ethnic or religious minorities²⁸. Internet connectivity was also frequently restricted, especially around the 2024 elections and in Balochistan, as well as before and during protests²⁹.

Pakistan's **blasphemy laws**³⁰ continued to have a negative impact on freedom of expression and disproportionately affect individuals belonging to minority religions and faith communities. Authorities highlighted existing legal safeguards and provincial Standard Operating Procedures (SOPs) for case handling, and judicial oversight as measures to curb misuse of the laws. However, these prove to be ineffective, with persistent reports of procedural delays, intimidation, and extrajudicial violence impacting blasphemy cases. There has been no prosecution of false accusations of blasphemy to date. Blasphemy laws are also misused for personal gain. During the reporting period, a so-called 'blasphemy business group' systematised such practice by entrapping over 800 people, mainly young men, through online scams. The network appears to be dismantled, but as of April 2026, over 300 of the falsely accused victims were still in jail.

Pakistan approved the Policy on Interfaith Harmony and Strategy on Religious Tolerance in February 2025 and made efforts to protect certain religious **minority communities**, but its effectiveness is yet to be established as hate speech against minorities remained a widespread challenge. The different minorities experience varying levels of discrimination, individual attacks, mob violence³¹ and destruction of their places of worship. Prosecution for hate crimes against minorities is limited, providing a sense of impunity for perpetrators and adding to the fear among victims. Pakistan's legal system and political discourse lack a comprehensive concept of 'minorities'. By limiting 'minorities' to non-Muslims, it fails to adequately capture discrimination and other human rights violations against members of non-majority Muslim communities as well as ethnic or linguistic minorities.

Ahmadi Muslims were subject to particular discrimination and violence. This included criminal cases based on discriminatory legislation preventing them from identifying with and practicing their religion, desecration of mosques and graves - in several instances reportedly with direct involvement or acquiescence of law enforcement and local authorities - and attacks against individuals, including targeted killings³². A range of administrative measures had a negative impact on Ahmadis' civil rights³³.

The **rights of the child** remained extremely fragile despite efforts. Pakistan also has a very high rate of out-of-school children in international comparison, with 26 million children aged 5-16 years (38 % of the total school-age population) currently out of school³⁴. As recalled by the ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR), education is key in preventing the engagement of children in child labour and efforts should be stepped up to improve access to free basic education for all children, taking into account the special situation of girls³⁵. Despite the National Education Emergency announced

in 2024, government spending on education fell to a new low in the past year³⁶. High numbers of cases of violence against children as well as uneven birth registration and access to health across regions continue to impede child rights³⁷.

Following the initiation of the **Illegal Foreigners Repatriation Plan** (IFRP) in September 2023, over 2 million Afghan nationals have returned to Afghanistan (out of which at least 10 % were deported). As highlighted by the Committee on the Elimination of Racial Discrimination (CERD), this entails risks for returning Afghan migrants, in particular for vulnerable groups, relating to trafficking and other forms of exploitation, harassment and intimidation³⁸. Afghan children are at special risk, with the UN Committee on the Rights of the Child (CRC) recalling the need to respect the principle of non-refoulement and ensure unimpeded access to services for children³⁹. As reminded by both Committees, a legislative and institutional framework should be established to respect and guarantee the rights of migrants, refugees and asylum seekers, in particular the most vulnerable groups. This includes putting in place protection safeguards, individual risk assessments, and essential services, such as documentation, education and healthcare.

The **judiciary** has played a key role in contributing to progress in the implementation of Pakistan's international human rights commitments. Latest constitutional amendments have, however, raised concerns about the impact of such reforms on the **independence of the judiciary, accountability of the military, and respect for the rule of law**. This compounds with lingering issues such as backlogs of pending cases at all levels of jurisdiction, and intimidation, threats or other unlawful interference against judges and prosecutors, as highlighted by the UN Human Rights Committee⁴⁰.

Pakistani civil society, including organisations working on human rights and other sensitive issues, continues to be vibrant, providing a crucial contribution for Pakistan to safeguard and make progress on human rights. At the same time, space for such organisations to operate, and to debate is increasingly restricted⁴¹. Recent policies and legislation introduced cumbersome registration procedures and restrictive regulations on foreign funding for **civil society organisations** with particularly complex approval processes in some provinces and for human rights organisations⁴².

Priorities for future engagement should include consolidating and advancing reform in the following areas: fair trial and access to justice, prison reform and the reform of the application of the capital punishment. Enforcement of existing laws, particularly the Anti-Torture Act and minority rights protections, should be strengthened. At the same time, robust steps are needed to reverse negative trends in relation to enforced disappearances and violations of freedom of expression. In this regard, laws on blasphemy, cybercrime (such as PECA), defamation, counterterrorism and sedition should be amended or repealed. Effective measures are needed to protect minority groups, including unequivocal measures to counter hate speech, while discriminatory measures and practices against Ahmadis should be ended. Comprehensive measures are needed to address violence against women, child rights and migrants/refugees protection. Significantly higher efforts are needed to provide free, compulsory and good quality education for all children at least until age 16. Overall, it is vital to ensure accountability for human rights violations to counter the prevailing sense of impunity. The new National Action Plan for Human Rights (2026-2029)⁴³ by the Ministry of Human Rights is instrumental to follow-up on the above priorities.

3.2 Labour Rights

On labour rights, the picture remains mixed. On the positive side, important steps were taken by all provinces to formulate evidence-based action plans to address child labour. On forced labour, significant steps included the ratification in March 2025 of ILO Protocol 29 of 2014 to the ILO Convention concerning Forced or Compulsory Labour, No 29 (1930) and the country-wide establishment of district vigilance committees to better enforce the existing laws against child labour and bonded labour⁴⁴. However, significant implementation gaps continued to undermine these advances. Forced labour persisted and child labour rates are only declining slowly. Trade unions are still quite weak in the country, while social dialogue also remained limited.

In relation to the **child labour conventions** (ILO Convention concerning Minimum Age for Admission to Employment, No 138 (1973) and ILO Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, No 182 (1999), most provinces and territories in Pakistan have improved their evidence base for effective policy making by conducting state-of-the art child labour surveys following the ILO methodology⁴⁵. All provinces and territories have also notified child labour action plans in cooperation with United Nations Children's Fund (UNICEF) and/or the ILO, and most of them now forbid children under 18 years old to work in hazardous occupations or are in the process of enacting such legislation. Also, lists of hazardous occupations are being updated.

Regarding **equal remuneration and non-discrimination** (ILO Convention concerning Equal Remuneration of Men and Women Workers for Work of Equal Value, No 100 (1951) and Convention concerning Discrimination in Respect of Employment and Occupation, No 111 (1958), a gender pay gap study has been published and a national wage reforms action plan to address the gap developed⁴⁶. In December 2025, Pakistan launched a National Roadmap for SME and Worker Formalization, developed with ILO support⁴⁷. This should benefit female workers in particular. The Government has developed a ratification plan which prioritises the ratification of several ILO conventions that will contribute towards promoting an enabling environment for women in the world of work and strengthen their access to labour protection⁴⁸. Several provinces established quotas for women in the public sector or state-owned enterprises. For instance, the Government of Sindh increased the quota for women from 5 % to 15 % in all public sector employment and maintained a transgender quota of 0.5 %. In Balochistan, female workers had a quota of 5 % regarding public sector posts. However, applications by women remained very low⁴⁹, raising doubts about the practical impacts of some of these quotas. Pakistan also maintained a 5 % job quota for **minorities** in federal and provincial government positions. This quota, however, remained under-implemented, and often applied in a discriminatory way, with roles predominantly limited to lower-grade, manual, or hazardous jobs⁵⁰.

Another positive development is the initiation by the Government of steps to better implement the Convention concerning Labour Inspection in Industry and Commerce, No 81 (1947)⁵¹ and the ILO Tripartite Consultation (International Labour Standards) Convention, 1976 (No. 144)⁵².

Labour rights, however, continue to suffer from significant implementation gaps. Among key concerns is the slow decline of **child labour** rates⁵³. Numerous hazardous jobs are still performed by children, including in domestic work. Furthermore, the vocational education and

training system has been expanding only slowly⁵⁴, despite the still very high rate of young people in Pakistan by international comparison who are neither in employment, nor in education or training⁵⁵, and despite the general need for better skilled workers in the economy.

Forced labour remains another very serious problem in Pakistan (in violation of ILO Convention No 29 and its recently ratified Protocol 29). Despite legislation prohibiting forced and bonded labour in all provinces and territories, an estimated 3 million people lived and worked in debt bondage (mainly on tenant farms in Sindh; and in brick kilns in Punjab) in 2023⁵⁶. The track record of district vigilance committees in reporting and addressing cases of bonded labour remained limited⁵⁷. Also the evidence base for adequate policy-making and enforcement remained insufficient: in 2024, CEACR noted with deep regret that, despite its repeated indication over several years, the Government had taken no concrete measures to undertake a statistical survey on bonded labour, strongly urging to conduct such a survey in the near future⁵⁸.

To address the root causes of bonded labour, the National Commission for Human Rights had recommended in its 2023 report to improve access to justice for workers; to prohibit entire families to be recruited as a ‘family unit’; to register all brick kilns and forbid children from working in brick kilns; and to provide alternative sources of micro credits through banks in proximity to workers, so that vulnerable workers do not need to turn to their own employers as a key source of loans. In terms of implementation of these recommendations, activities of provinces so far seem to have been mainly targeted at children in brick kilns and on establishing more transparency of credit payments and related repayments. Punjab has developed a standard contract for brick kiln workers.

The abolition of forced labour would greatly benefit from a more effective and more efficient **labour inspection system**. Yet, throughout the reporting period, the labour inspectorates continued to be under-resourced⁵⁹, were provided with inadequate means of transport, lacked equipment and training, and did not impose sufficiently deterrent fines. The CEACR also urged strengthening the capacity of other law enforcement agencies, including in particular the police, to address forced labour⁶⁰.

Several pieces of older legislation that still violate the Convention concerning the Abolition of Forced Labour, No. 105 (1957) would need amendment⁶¹, although the practical day-to-day implementation of this convention did not receive major observations from the CEACR.

Another key challenge is the lack of sufficient alignment of Pakistan’s laws and practices with the Conventions on **Freedom of Association and Collective Bargaining** (Convention concerning Freedom of Association and Protection of the Right to Organise, No. 87 (1948) and Convention concerning the Application of the Principles of the Right to Organise and to Bargain Collectively, No 98 (1949). Although the number of trade unions increased steadily, the unionisation rate remained below 5 % throughout the GSP+ decade (2014-2026). Provinces did not publish complete lists of registered unions. Female leadership in industrial trade unions remained low. There were reports of harassment and intimidation of trade union members during the process of registration of a union. Unions’ activities were also hindered by the creation of employer-dominated ‘yellow unions’, and a lack of formal employment contracts. Further, the scope of the Industrial Relations acts remains too narrow: as has been requested by the CEACR for years, their scope should be extended to include categories of workers currently excluded, such as agricultural and fisheries workers, informal economy workers,

managerial personnel, or self-employed workers⁶², their current exclusion preventing these workers from engaging in collective bargaining⁶³. Also an increasing number of ‘contractual workers’ (hired through third party agents) found it difficult to join a trade union. The new Labour Code of Punjab is, however, expected to address some of these issues⁶⁴.

Pakistan has an industrial relations system based on trade unions at enterprise level, but the share of workers benefitting from collective agreements remained low. Most provincial industrial relations acts do not foresee that workers can directly join sectoral trade unions at provincial level, which makes collective bargaining at sector level in those provinces more difficult⁶⁵. Furthermore, most of the existing industrial relation acts are permitting collective bargaining in an enterprise only if a trade union represents at least one third of the enterprise’s employees⁶⁶. As repeatedly requested by the CEACR, relevant legislation needs to be amended to ensure that, when no union reaches this threshold, collective bargaining rights are granted to the existing unions⁶⁷.

A further concern is the slow increase of the **labour market participation rate of women**, which stood at 28.2 % in 2025⁶⁸, while the labour market remains very gender segmented. Factors holding back women from participating in the labour market include difficult access to education and training for girls and women (including vocational education and training)⁶⁹, concerns about unsafe means of transport and sexual harassment at work, as well as gaps in available childcare⁷⁰. An ILO study published in 2025 estimated the hourly gender pay gap in Pakistan at 25 %⁷¹, with variations depending on the sector of the economy, age and education, and even higher in the informal economy⁷².

A major cross-cutting problem is the lack of promising avenues for individual workers to assert their legally enshrined labour rights in practice, including their protection against unfair dismissal or enforcement of their right to be paid at least the minimum wage: trade unions are fragmented and do not have sufficient capacity to advise many workers on their rights; the labour inspection system remains understaffed; district vigilance committees have not yet reached high effectiveness to support the most vulnerable workers; and labour courts are understaffed, leading to excessively long court cases⁷³.

Priorities for future engagement are to step up implementation and enforcement of existing laws and policies, while in some areas, further legislative alignments or a more comprehensive strategy will also be required. The newly established action plans of provinces and territories to eliminate child labour will need effective implementation. A ‘Forced Labour Survey’ conducted in line with ILO standard methodology covering the entire country is required to inform more targeted policy-making in order to abolish forced labour in the future. Implementation efforts across high-risk sectors should be strengthened through a phased action plan. The trade union registration processes should be simplified, and social dialogue mechanisms be strengthened, while provinces could also allow workers to directly join sectoral trade unions. To promote equality of opportunity and treatment for women in respect of employment and occupation, an overarching national strategy should be developed (including improved basic education, vocational education and training, and safety of transport to the workplaces). The capacity of labour inspectorates should be significantly ramped up through training and ensuring high professionalism, increasing the number of inspectors (including female ones) and aligning the frequency of inspections per establishment with ILO standards in all sectors in all provinces. Beyond labour inspections, it would be important to establish quick and inexpensive other avenues for individual workers to enforce their labour rights, through the ombudsmen, courts, or similar mechanisms.

3.3 Environment and Climate

Pakistan experienced acute climate pressures in 2024 and 2025, including heatwaves exceeding 50° C in Sindh and Punjab, severe monsoon flooding and subsequent drought and cold spells, affecting millions. Ranked among the five most climate-vulnerable countries globally⁷⁴, it faced water shortages, crop losses and infrastructure damage, intensifying the focus on adaptation. It also severely suffered from smog⁷⁵. Throughout the reporting period, Pakistan maintained engagement with the environmental conventions through policy measures and timely fulfilling its reporting obligations (see Annex).

Pakistan has complied with its reporting obligations under the United Nations Framework Convention on Climate Change (1988) (**UNFCCC**) and the **Kyoto Protocol** to the UNFCCC and received no requests for additional information from the Secretariat⁷⁶. In September 2025, Pakistan also submitted its updated Nationally Determined Contribution under the **Paris Agreement**, extending its mitigation pathway towards 2035 while retaining a similar ambition and conditional structure. Implementation is guided by the National Climate Change Policy and the National Adaptation Plan (2023), alongside the Recharge Pakistan programme⁷⁷. Complementary steps include adoption of the National Clean Air Policy (2023), issuance of Carbon Market Guidelines (2024) and access to the International Monetary Fund Resilience and Sustainability Facility, linking concessional climate finance to reforms in energy pricing, public investment and disaster-risk management⁷⁸.

With respect to the **Montreal Protocol** on Substances that Deplete the Ozone Layer (1987), Pakistan continued implementation of its Hydrochlorofluorocarbon Phase-out Management Plans. Stage II was concluded in December 2024, and Stage III, running to 2030, targets a 67.5 % reduction by 2026 and full phase-out by 2030, supported by the United Nations Environment Programme (UNEP) and the United Nations Industrial Development Organization (UNIDO)⁷⁹. Pakistan ratified the **Kigali Amendment** to the Montreal Protocol **on 31 January 2024**, committing to a phase-down of hydrofluorocarbons (HFCs) to mitigate global warming.

Compliance also continued under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (1973) (**CITES**). Following the seventy-seventh Standing Committee meeting in November 2023, Pakistan was upgraded to Category 1, confirming that its implementing legislation meets Convention standards⁸⁰. Under the **Basel Convention** on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (1989), Pakistan adopted the Hazardous Waste (Import and Export) Rules 2024, strengthening licensing, manifest and reporting systems⁸¹, while progressing toward a national hazardous waste database.

Under the **Convention on Biological Diversity** (1992), with support from the United Nations Development Programme (UNDP) and the Global Environment Facility, Pakistan submitted its 7th National Report in March 2026⁸² and is finalising the update of its Strategy and Action Plan, in line with the Global Biodiversity Framework, completion being expected in 2027⁸³. Pakistan also complied with reporting under the **Cartagena Protocol on Biosafety** (2000)⁸⁴ and the **Stockholm Convention on Persistent Organic Pollutants** (2001), including updates on its polychlorinated biphenyl inventories and hazardous waste stockpiles⁸⁵.

While reporting compliance and policy development remain broadly on track, further effort is required to strengthen enforcement, disaster-risk reduction and provincial implementation capacity, particularly in hazardous waste management, biodiversity protection and operationalisation of carbon market mechanisms.

Priorities for future engagement should focus on translating policy frameworks into measurable emission reductions and strengthened resilience on the ground. This includes accelerating implementation of the updated Nationally Determined Contribution, operationalising the Carbon Market Guidelines, reinforcing monitoring and verification systems, and expanding nature-based solutions and climate-resilient infrastructure in agriculture and urban areas. Greater investment in enforcement capacity at provincial and local levels will be essential, alongside strengthened hazardous waste tracking, biodiversity protection aligned with the Global Biodiversity Framework, and improved disaster-risk management to reduce exposure to extreme weather events.

3.4 Good Governance (Anti-Corruption and Drug Control)

Pakistan has maintained compliance with reporting obligations under the three **UN drug control Conventions**⁸⁶ (cf. Annex). Since devolution, Pakistan has also made notable strides in updating its narcotics control framework through provincial legislation. The provinces of Sindh⁸⁷, Punjab⁸⁸ and Khyber Pakhtunkhwa (KPK)⁸⁹ have updated their legal frameworks to align with national and international narcotics control commitments, introducing harsher penalties, specialised courts, and precursor chemical controls, while Balochistan's Control of Narcotics Substances Bill, 2026⁹⁰ aims to curb trafficking and promote social reforms. The Inter-Agency Task Force on Counter Narcotics has played a role in coordinating anti-trafficking initiatives.

Other positive developments include the Drug Regulatory Authority of Pakistan (DRAP) strengthening pharmaceutical regulations to prevent diversion⁹¹ and the Anti-Narcotics Force (ANF) - which leads drug control in the country - launching a digital case management system to improve enforcement efficiency⁹².

Despite these advances, critical challenges persist. Pakistan remained a transit hub for opiate trafficking⁹³. Domestic addiction rates were among the highest in the world, fuelling a severe public health crisis. According to International Narcotics Control Board (INCB) annual reports, Pakistan has played a significant role in regional cannabis trafficking networks, primarily as a transit and destination country, and has been increasingly affected by synthetic drug trafficking, including methamphetamine, particularly as a destination market⁹⁴.

To address these challenges, increased regional cooperation would be required to disrupt trafficking networks, as well as investment in the Anti-Narcotics Force (ANF)'s technological and operational capacity⁹⁵, and harmonisation of provincial and federal laws. Further, all substances scheduled under the UN Conventions on drug control should be included into the national list of controlled substances (as part of the Commission on Narcotic Drugs). A balanced and human rights-based approach - combining enforcement, public health, and global collaboration - will be essential to sustain progress in combating narcotics trafficking and abuse. In this regard, introducing a distinction between traffickers and drug users in the law would be key. In this context, health-based approaches and harm reduction strategies, including youth counselling and community-based treatment, should be scaled up.

Pakistan has also somewhat advanced its **anti-corruption framework**. Under the UN Convention against Corruption (2004) (UNCAC), Pakistan participated in the related review mechanisms such as the 2nd cycle implementation review (2016-2021) on which the report was released in February 2026⁹⁶.

Domestically, the Supreme Court endorsed amendments to the National Accountability Ordinance in September 2024, streamlining complaint procedures to reduce frivolous cases. The National Accountability Bureau (NAB) achieved record recoveries⁹⁷, at provincial level Sindh recruited 400 investigators⁹⁸ and Punjab adopted a ‘zero-tolerance’ policy⁹⁹, further strengthening enforcement. KPK’s proposed an Anti-Corruption Force Bill¹⁰⁰.

Despite these positive developments, concerns persist regarding the effectiveness and independence of anti-corruption bodies. Reports from civil society and international observers indicate that corruption remains entrenched in public administration, with limited accountability for high-level offences. Resource constraints and a lack of impartiality undermine the ability of these institutions to investigate and prosecute cases transparently¹⁰¹.

Priorities for future engagement should focus on strengthening the independence, impartiality, preventive measures and operational coordination capacity of anti-corruption institutions across federal and provincial bodies. Legislative reforms are required along with appropriate budget allocations. Pakistan should update the National Anti-Corruption Strategy incorporating the recommendations of the International Monetary Fund (IMF) and UNCAC, including clear implementation mechanisms, timelines and key performance indicators. A balanced narcotics policy, combining enforcement with public health, should be paired with deeper regional cooperation.

4. Development cooperation in support of GSP+ objectives

The EU has committed EUR 400 million in grants and blending for its partnership with Pakistan for 2021-2027. Priority areas include: green inclusive growth, human capital development, and governance including rule of law and human rights. The bilateral cooperation is complemented with global and regional projects covering Pakistan (e.g., on migration) and thematic cooperation support civil society (e.g., women and youth organisations). Under the Global Gateway initiative, the EU is planning to expand its support through investments in various sectors, including water management and climate adaptation.

The EU supports a sizable number of projects that directly contribute to the UNFCCC and the Kyoto Protocol or to preventing and mitigating the effects of climate change. This includes post-flood rural economic recovery projects in KPK and in Balochistan; a Better Governance and Business Environment project focused on greening small and medium size enterprises; the revival of the Balochistan Water Resources Programme; an ‘Energy for Climate Resilience’ project in Gilgit-Baltistan and in KPK; a Rural Development and Climate Resilience Project in Gilgit-Baltistan; a Punjab urban water and wastewater governance and services improvement project for Faisalabad and Lahore cities; and a poverty alleviation and inclusive development project across rural Sindh (EUR 50 million).

In addition, the EU and Pakistan have a large number of cooperation projects to support human rights or good governance. This includes a national project on the promotion of human rights in Pakistan notably supporting the Federal Human Rights Ministry and the National Commission for Human Rights and other provincial departments and statutory bodies;

support to parliamentary development; support to civil society in Pakistan working in partnership with the Ministry of Economic Affairs; support to adaptive social protection in Sindh to strengthen long-term resilience; a large education programme in Balochistan; a comprehensive rule of law programme in KPK and Balochistan; a programme supporting access to the labour market and decent work through technical and vocational education and training; and a project on women participation and leadership.

Annex: Pakistan - Compliance with GSP ratification and reporting obligations

Convention	Ratification status / Reservations	Compliance with reporting obligations to monitoring bodies
Human Rights		
1. Convention on the Prevention and Punishment of the Crime of Genocide (1948)	Ratified: 12.10.1957 No reservations	No reporting obligations
2. International Convention on the Elimination of All Forms of Racial Discrimination (1965)	Ratified: 21.09.1966 No reservations	Not compliant with reporting obligations • Last Committee report: 22.08.2024 • Last report submitted: 28.10.2021 • Next report due: 24.09.2025 (not submitted)
3. International Covenant on Civil and Political Rights (1966)	Ratified: 23.06.2010 Reservations on Articles 3, 6, 7, 12, 13, 18, 19, 40 ²	Compliant with reporting obligations • Last Committee report: 02.12.2024 • Last report submitted: 16.06.2022 • Next report due: 09.11.2027
4. International Covenant on Economic Social and Cultural Rights (1966)	Ratified: 17.04.2008 No reservations	Compliant with reporting obligations • Last Committee report: 23.06.2017 • Last report submitted: 24.5.2023 • Next periodic report due: not yet set
5. Convention on the Elimination of All Forms of Discrimination Against Women (1979)	Ratified: 12.03.1996 Ratification subject to the provisions of the Pakistan constitution. Reservation on Article 29(1) ³	Not compliant with reporting obligations • Last Committee report: 28.02.2020 • Last report submitted: 09.10.2018 • Next report due: February 2024 (not submitted)
6. Convention Against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (1984)	Ratified: 23.06.2010 Reservations on Articles 8, 28 and 30 ⁴	Compliant with reporting obligations • Last Committee report: Advance unedited version 29.04.2026 • Last report submitted: 16.06.2022 • Next report due: Follow-up report 01.05.2027, periodic report 01.05.2030
7. Convention on the Rights of the Child (1989)	Ratified: 12.11.1990 No reservations	Compliant with reporting obligations • Last Committee report: 05.02.2026 • Last report submitted: 03.08.2023 • Next report due: Not yet set
Labour Rights^{5 6}		
8. Convention concerning Forced or Compulsory Labour, No 29 (1930)	Ratified: 23.12.1957	Compliant with reporting obligations • Latest CEACR comments: 2024 • Last Government report submitted: 2023

² Permitted reservation according to the monitoring body.

³ Permitted reservation according to the monitoring body.

⁴ Permitted reservation according to the monitoring body.

⁵ Following a decision taken by the ILO Governing Body to modernize the ILO reporting system, as from 2027 Governments will no longer submit separate reports for each ratified Convention, but instead, they will submit thematic reports, grouping conventions in 15 thematic areas. As a transition year, only a limited number of reports will be requested in 2026. See: The future of reporting on ratified conventions, <https://www.ilo.org/international-labour-standards/applying-and-promoting-international-labour-standards-overview-ilo/future-reporting-ratified-conventions>.

⁶ Reservations do not apply in the ILO system.

Convention	Ratification status / Reservations	Compliance with reporting obligations to monitoring bodies
		• Next report due: not yet set
9. Convention concerning Freedom of Association and Protection of the Right to Organise, No 87 (1948)	Ratified: 14.02.1951	Compliant with reporting obligations • Last CEACR comments: 2025 • Last Government report submitted: 2025 • Next report due: not yet set
10. Convention concerning the Application of the Principles of the Right to Organise and to Bargain Collectively, No 98 (1949)	Ratified: 26.05.1952	Compliant with reporting obligations • Last CEACR comments: 2025 • Last Government report submitted: 2025 • Next report due: not yet set
11. Convention concerning Equal Remuneration of Men and Women Workers for Work of Equal Value, No 100 (1951)	Ratified: 11.10.2001	Compliant with reporting obligations • Latest CEACR comments: 2025 • Last Government report submitted: 2025 • Next report due: not yet set
12. Convention concerning the Abolition of Forced Labour, No 105 (1957)	Ratified: 15.02.1960	Compliant with reporting obligations • Last CEACR comments: 2021 • Last Government report submitted: 2023 • Next report due: not yet set
13. Convention concerning Discrimination in Respect of Employment and Occupation, No 111 (1958)	Ratified: 24.01.1961	Compliant with reporting obligations • Last CEACR comments: 2025 • Last Government report submitted: 2024 • Next report due: not yet set
14. Convention concerning Minimum Age for Admission to Employment, No 138 (1973)	Ratified: 06.07.2006 Minimum age specified: 14 years	Compliant with reporting obligations • Last CEACR comments: 2023 • Last Government report submitted: 2023 • Next report: not yet set
15. Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, No 182 (1999)	Ratified: 11.10.2001	Compliant with reporting obligations • Last CEACR comments: 2023 • Last Government report submitted: 2023 • Next report due: not yet set
Environment and Climate		
16. Convention on International Trade in Endangered Species of Wild Fauna and Flora (1973)	Ratified: 20.04.1976 No reservations	Compliant with reporting obligations. • Annual Trade Report for 2023 submitted 04.03.2024 • Annual Trade Report for 2024 submitted 11.03.2025 • Next Annual Trade Report due 31.10.2026 • Last Annual Illegal Trade Reports submitted for 2023, 2024 ⁷ • Last Implementation Reports: 2021–2022 ⁸
17. Montreal Protocol on Substances that Deplete the Ozone Layer (1987)	Ratified: 18.12.1992 No reservations	Compliant with reporting obligations Last report submitted: • Article 7 data report covering 2024 Next report: • Article 7 data report covering 2025 due 30.09.2026
18. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (1989)	Ratified: 26.07.1994 No reservations	Compliant with reporting obligations. • National Report (NR) for 2023 outstanding. • NR for 2024 submitted 05.03.2026 • Next NR (2025) due 31.12.2026

⁷ Reporting mandatory but not subject to compliance procedure.

⁸ Ibid.

Convention	Ratification status / Reservations	Compliance with reporting obligations to monitoring bodies
19. Convention on Biological Diversity (1992)	Ratified: 26.07.1994 No reservations	Compliant with reporting obligations. • Seventh national report (7NR) submitted 01.03.2026. • Latest National Biodiversity Strategy and Action Plan (NBSAP) update: submitted 2018 (until 2030) • Next report: 8NR due 30.06.2029
20. The United Nations Framework Convention on Climate Change (1992)	Ratified: 01.06.1994 No reservations	Compliant with reporting obligations • Latest updated Nationally Determined Contributions (NDC 3.0) submitted 24.09.2025 • Latest National Communication (NC): NC3 submitted 30.06.2025 • First Biennial Transparency Report (BTR1): submitted 16.06.2025 • Next report (BTR2) due 31.12.2026
21. Cartagena Protocol on Biosafety (2000)	Ratified: 02.03.2009 No reservations	Compliant with reporting obligations • Latest National Report: 5NR submitted 27.02.2026 • Next report: Not yet set
22. Stockholm Convention on persistent Organic Pollutants (2001)	Ratified: 17.04.2008 No reservations	Compliant with reporting obligations • Latest National Report: 5NR submitted 24.08.2022 • Next Report: 6NR due 31.08.2026 • Initial National Implementation Plan (NIP) submitted 15.12.2009 • NIP updates: COP4, COP5 and COP6 amendments included
23. Kyoto Protocol to the United Nations Framework Convention on Climate Change (1998)	Ratified: 11.01.2005 No reservations	No reporting obligations separate from United Nations Framework Convention on Climate Change
Good Governance		
24. United Nations Single Convention on Narcotic Drugs (1961)	Ratified: 09.07.1965 No reservations	Compliant with reporting obligations 2024 reporting fulfilled Latest INCB mission in 2012
25. United Nations Convention on Psychotropic Substances (1971)	Ratified: 09.06.1977 No reservations	
26. United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (1988)	Ratified: 25.10.1991 No reservations	Compliant with reporting obligations 2025 reporting fulfilled
27. United Nations Convention against Corruption (2004)	Ratified: 31.08.2007 No reservations ⁹	Compliant with reporting obligations First review cycle completed in 2017 Second review cycle completed in September 2024

⁹ Declaration made in line with Article 66(3) of UNCAC that Pakistan does not consider itself bound by the provisions of Article 66(2), arbitration and potential referral of cases to the International Court of Justice.

¹ Key 2026 events at the moment of writing have been included in this Staff Working Document. All links provided were up to date as of 28 April 2026.

² World Bank, 'Reclaiming Momentum Towards Prosperity: Pakistan's Poverty, Equity, and Resilience Assessment', 2025. <https://openknowledge.worldbank.org/entities/publication/21567354-9a75-4e6d-a2b2-219a69f007a1>.

³ Source for all statistics in section 2.2: Eurostat data covering 2022-2024 based on latest available validated full year data as of September 2025. GSP statistics only cover goods imported into the EU market, i.e., goods released for free circulation in the EU. The GSP statistics do not cover other EU-imports, like goods imported for the customs inward processing procedure or re-imports after the customs outward processing procedure. Trade flows registered as 'confidential' do not appear in the GSP+ usage figures and regime 1 normal trade; but do appear in total trade figures (regime 4).

https://ec.europa.eu/eurostat/cache/metadata/en/ext_go_agg_esms.htm#conf1537195068659.

⁴ In the same time period, EUROSTRAT EU global imports for textile and clothing in value (HS chapters 50 to 63, footwear and leather excluded) fluctuated from EUR 139bn in 2022, to EUR 116bn in 2023, and EUR 121bn in 2024.

⁵ Products that benefit from GSP are separated in sections according to the GSP Regulation. Information on which CN codes are included in the GSP sections can be found in Annex V of the Regulation No 978/2012. <https://eur-lex.europa.eu/eli/reg/2012/978/2025-01-01/eng/>.

⁶ Commission Implementing Regulation (EU) 2025/1206 of 19 June 2025 on the suspension of the GSP+ tariff preferences with regard to imports of ethanol originating in Pakistan, C/2025/3866, OJ L 2025/1206, ELI: http://data.europa.eu/eli/reg_impl/2025/1206/oj.

⁷ It has maintained a few reservations (notably under the ICCPR and CEDAW), as flagged by human rights bodies.

⁸ Pakistan has not issued a standing invitation to UN Special Procedures and has not responded to any requests for country visits for a decade. The Independent Expert on Albinism visited Pakistan from 3 to 13 June 2026. Pakistan received a high number (24 in 2024 and 2025) of UN Special Procedures communications and replied to 10 of them, with a notable increase of such responses since December 2025.

⁹ Both NCSW and NCRC are financially and administratively independent bodies. NCSW has had an interim chairperson since November 2024; the new interim Chairperson was appointed on 25 March 2026. The tenure of the current Chairperson of NCRC is still ongoing but the Members of the Commission completed their three-year tenure on 29 April 2026.

¹¹ Instead of a comprehensive definition of minorities that would cover all grounds of discrimination included in the CERD, Pakistan narrowly defines minorities as non-Muslim religious groups and grants minority rights and protection accordingly. Individuals and communities who identify as Muslims are not covered by such provisions, even if they constitute a minority share of the overall population, e.g. the Shiah. Ethnic and racial minorities are not covered by Pakistan's definition.

¹² The death penalty was abolished for railway sabotage (2022), narcotics crimes (2023), harbouring hijackers (Section 402-C) and stripping a woman in public (Section 354-A of the Penal Code). The Criminal Laws Amendment Bill was passed in July 2025. 'The death penalty in Pakistan 2025', National Commission for Human Rights and Justice Project Pakistan, October, 2025. <https://www.jpp.org.pk/the-death-penalty-in-pakistan-2025>.

¹³ UN Women, 'Statement on ICT Child Marriage Restraint Bill 2025', 2025. www.asiapacific.unwomen.org/en/stories/statement/2025/05/islamabad-capital-territory-child-marriage-restraint-bill-2025-0; and Pakistan Code, 'ICT Child Marriage Restraint Act 2025'. <https://pakistancode.gov.pk>.

¹⁴ Human Rights Committee, 'Concluding Observations on the second periodic report of Pakistan', 2 Dec. 2024, para. 16.

¹⁵ The 'Punjab Child Marriage Restraint Ordinance, 2026 (I of 2026)', Local Government and Community Development, Punjab Gazette (Extraordinary Issue), 11 Feb. 2026. <https://citylaws.pk/wp-content/uploads/2026/02/Punjab-Child-Marriage-Restraint-Ordinance.pdf>.

¹⁶ Associated Press of Pakistan, 'Education Ministry Sets 3-Month Goal to Enrol 25,000 Out-of-School Children in Islamabad', 16 Mar. 2026. <https://www.nation.com.pk/05-Mar-2026/union-council-wise-child-left-behind-drive-launched-enrol-out-of-school-children-islamabad>.

¹⁷ Pakistan's legal system and political discourse lack a comprehensive concept of 'minorities'. By limiting 'minorities' to non-Muslims, it fails to adequately capture discrimination and other human rights violations against members of non-majority Muslim communities as well as ethnic or linguistic minorities.

¹⁸ UN Special Procedures, 'Communication AL PAK 1/2025', 18 Feb. 2025.

¹⁹ The government of Pakistan reports 983 alleged criminals to be killed in police encounters in the five provinces during which 61 police officers were killed in 2025. A report by a civil society organisation documented 670 CCD-

led encounters over the course of eight months in 2025 in Punjab, resulting in the deaths of 924 suspects, with only two police officers killed during the same period. Concerns about extrajudicial killings were also raised by UN Special Procedure, ‘UN experts urge Pakistan to address human rights violations in Balochistan’, 19 Apr. 2025. www.ohchr.org/en/press-releases/2025/04/un-experts-urge-pakistan-address-human-rights-violations-balochistan and the Human Rights Committee’s Concluding Observations on the second periodic report of Pakistan, 2 Dec. 2024.

²⁰ UN Human Rights Committee, ‘Concluding observations on the second periodic report of Pakistan’, 2 Dec. 2024 and UN Working Group on Enforced or Involuntary Disappearances, Communication of May 2025.

²¹ ‘The Anti-Terrorism (Balochistan Amendment) Act – Act. No. XVII of 2025. No.PAB/Legis: V (18)/2025’, Balochistan Provincial Assembly Secretariat, 5 Jun. 2025. [www.pabalochistan.gov.pk/storage/8266/6864df4dc7c11_The-Anti-Terrorism-\(Balochistan-Amendment\)-ACT-2025.pdf](https://www.pabalochistan.gov.pk/storage/8266/6864df4dc7c11_The-Anti-Terrorism-(Balochistan-Amendment)-ACT-2025.pdf).

²² OHCHR, ‘UN Special Procedures communications AL PAK 1/2025’, 18 Feb. 2025. <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=29607>; OHCHR, ‘UN Special Procedures communications AL PAK, OL PAK 12/2025’, 18 Nov. 2025. <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=30492>.

²³ Human Rights Committee, ‘Concluding observations on the second periodic report of Pakistan’, 2 Dec. 2024.

²⁴ National Assembly of Pakistan, ‘The Anti-terrorism (Amendment) Bill, 2025’, 2025. https://na.gov.pk/en/index.php/uploads/uploads/documents/67ff96b6a5a10_187.pdf. While the Anti-Torture Act bans evidence obtained through torture in court proceedings, section 21-H of the Anti-Terrorism Act makes confessions made in police custody admissible under certain conditions, raising concerns about some of these being made under torture.

²⁵ UN Special Procedures communications of 10 December 2025 (Communication AL PAK 16/2025, <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=30613>) and of 16 December 2025 (Communication AL PAK 15/2025: <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=30614>).

²⁶ Reporters without borders, ‘Press Freedom Index 2025 – Pakistan’, 2025. www.rsf.org/en/country/pakistan. The score dropped by 4 points from 2024 to 2025, making Pakistan rank 158 out of 180 countries.

²⁷ OHCHR, ‘Pakistan: UN experts alarmed by the conviction of Imaan Mazari-Hazir and Hadi Ali Chattha’ Press Release, 4 Feb. 2026. www.ohchr.org/en/press-releases/2026/02/pakistan-un-experts-alarmed-conviction-imaan-mazari-hazir-and-hadi-ali. See also: UN Special Procedures on 6 May 2025 (Communication AL PAK 5/2025, <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=29906>) and 22 December 2025 (AL PAK 17/2025, <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=30615>).

²⁸ Human Rights Committee, ‘Concluding observations on the second periodic report of Pakistan’, 2 Dec. 2024.

²⁹ Amnesty International, ‘Pakistan: Shadows of Control: Censorship and mass surveillance in Pakistan’, 9 Sept. 2025. <https://www.amnesty.org/en/documents/asa33/0206/2025/en/>.

³⁰ The government reported 663 individuals imprisoned for blasphemy as of September 2024 as well as 260 new accusations of blasphemy registered in 2025.

³¹ Committee on the Elimination of Racial Discrimination, ‘Concluding observations on the combined twenty-fourth to twenty-sixth periodic reports of Pakistan’, 24 Sep. 2024. There were 213 cases in 2023 with less than 7 % mob violence arrest rate.

³² The persecution of Ahmadis has been raised in several UN Special Procedures communications, including, AL PAK 4/2025 and AL PAK 2/2023.

³³ Human Rights Watch, ‘Pakistan Denies Voting Rights to Religious Community’, 8 Dec. 2023. <https://www.hrw.org/news/2023/12/08/pakistan-denies-voting-rights-religious-community>; Amnesty International, ‘Pakistan: End cyclical harassment and persecution of minority Ahmadiyya community’, 5 Jun. 2025. <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/>; and Voicepk.net, ‘Ahmadis face widespread restrictions on Eid prayers, escalating persecution’, 2 Apr. 2025. <https://voicepk.net/2025/04/ahmadis-face-widespread-restrictions-on-eid-prayers-escalating-persecution/>.

³⁴ National Commission on the Rights of the Child, ‘Annual Report 2024–25’, 2025. www.ncrc.gov.pk/wp-content/uploads/2025/07/Annual-Report-24-25.pdf; and National Commission on the Rights of the Child/UNICEF, ‘The State of Children in Pakistan 2024’, 2024. <https://www.unicef.org/pakistan/reports/state-children-pakistan-2024>.

³⁵ International Labour Organisation (ILO), ‘Observation (CEACR) on Convention No 182’, adopted 2023, published 113rd ILC session, 2024. https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNT_RY_ID:4365945,103166.

- ³⁶ Save the Children, 'Education spending in Pakistan hits new low with more than one in three children out of school', 19 Jun. 2025. www.savethechildren.net/news/education-spending-pakistan-hits-new-low-more-one-three-children-out-school-save-children.
- ³⁷ UN Committee of the Rights of the Child, 'Review of Pakistan', 2026.
- ³⁸ UN Committee on the Elimination of Racial Discrimination, 'Concluding observations on the combined twenty-fourth to twenty-sixth periodic reports of Pakistan', 24 Sep. 2024.
- ³⁹ UN Committee on the Rights of the Child, 'Concluding observations on the combined sixth and seventh periodic reports of Pakistan', DoC. CRC/C/PAK/CO/6-7, 5 Feb. 2026.
- ⁴⁰ UN Human Rights Committee, 'Concluding observations on the second periodic report of Pakistan', 2 Dec. 2024.
- ⁴¹ Ibid.
- ⁴² EuSEE, 'Country Focus Report Pakistan', July 2025. https://eusee.hivos.org/assets/2025/09/Pakistan-Final-Country-Focus-Report_edited-with-TC.pdf.
- ⁴³ While it is difficult to ascertain a definitive timeline, it is expected the National Action Plan to be officially notified by the end of June 2026.
- ⁴⁴ ILO, 'ILO Helpdesk: Business and forced labour'. <https://www.ilo.org/resource/other/ilo-helpdesk-business-and-forced-labour>; and ILO, 'A global alliance against forced labour', 2005. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@declaration/documents/instructional_material/wcms_099624.pdf.
- ⁴⁵ Punjab: <https://stateofchildren.com/punjab-child-labour-survey-pcls-2019-2020/>; Gilgit-Baltistan: <https://www.unicef.org/pakistan/media/5241/file/Gilgit%20Baltistan%20Child%20Labour%20Survey%202018-2019%20Report.pdf>; Sindh: https://dglabour.gos.pk/wp-content/uploads/2025/07/SCLS_KFR_02.07.2025.pdf; Khyber Pakhtunkhwa: <https://stateofchildren.com/kp-child-labour-survey-2022/>; Balochistan: <https://stateofchildren.com/balochistan-child-labour-survey-2023-2024-report/>; Islamabad Capital Territory: <https://stateofchildren.com/islamabad-capital-territory-child-labour-survey-2023-2024/>. The only child labour survey which is not yet published on the internet is the one currently being finalised by Azad Jammu and Kashmir; only a snapshot overview of data from 2020 on Azad Jammu and Kashmir is currently publicly available in: https://www.pndajk.gov.pk/micsajk/3-AJ&K_MICS_2020-21_SNAPSHOTS.pdf.
- ⁴⁶ ILO news 22 July 2025. <https://www.ilo.org/resource/news/pakistan-launches-gender-pay-gap-report-and-national-action-plan-equal-pay>.
- ⁴⁷ Pakistan's informal economy employed 72.5 % of the workforce, according to Pakistan Bureau of Statistics, Labour Force Survey 2020-2021 (cf. also Decent Work Country Programme 2023-2027, https://www.ilo.org/sites/default/files/2024-03/ILO_Pakistan_DWCP%20WEB_v7_photos_FINAL_0.pdf).
- ⁴⁸ The Decent Work Country Programme 2023-2027 mentions for instance ILO Convention No 183 on maternity protection, Convention No 175 about part-time work and Convention No 102 about social security.
- ⁴⁹ In Sindh, for example, only 1 female candidate applied.
- ⁵⁰ UNDP, 'The Future of Governance and the Social Contract', Feb, 2026. <https://www.undp.org/pakistan/publications/future-governance-and-social-contract>.
- ⁵¹ For example, the number of inspectors has been increased.
- ⁵² The Federal Tripartite Consultation Committee (FTCC) in May 2024 endorsed ratification of three ILO conventions. <https://www.ilo.org/resource/news/pakistan%E2%80%99s-tripartite-labour-conference-concludes-unified-commitment>.
- ⁵³ For example, surveys show the following child labour rates per province or territory: Punjab (13.4 %), Gilgit-Baltistan (13.1 %), Sindh (14.6 %), KPK (12.9 %), ICT (2.4 %). In most provinces and territories, the rate is also very high for the sub-group of children aged 10-13 years.
- ⁵⁴ The Decent Work Country programme 2023-2027 mentions that Technical and Vocational Education & Training (TVET) institutions in Pakistan offer approximately 437 000 training places every year, but that this is insufficient to meet the demands of a growing population and provide the population with market-ready skills, with approximately 3 million young people entering the labour market each year.
- ⁵⁵ World Bank, 'Share of youth not in education, employment or training', 2026. <https://data.worldbank.org/indicator/SL.UEM.NEET.ZS?locations=PK>.
- ⁵⁶ National Commission on Human Rights, 'The issue of bonded labour in Pakistan', Aug, 2023. <https://nchr.gov.pk/wp-content/uploads/2023/08/Bonded-Labour-Report.pdf>.
- ⁵⁷ ILO, 'Observation (CEACR) on Convention No 29', adopted 2024, published 113rd ILC session, 2025. https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNT_RY_ID:4405672,103166:NO; The CEACR noted zero convictions of perpetrators, despite the high number of people in bonded labour. See also National Commission for Human Rights 2023 report on bonded labour <https://nchr.gov.pk/wp-content/uploads/2023/08/Bonded-Labour-Report.pdf>.

- ⁵⁸ ILO, ‘Observation (CEACR) on Convention No 29’, adopted 2024, published 113rd session, 2025. https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNT_RY_ID:4405672,103166.
- ⁵⁹ In total, less than 600 inspectors for the entire country enforce the labour rights of a labour force comprising approximately 70 million persons. The number of female labour inspectors also remained very low (<10 % in most provinces and territories).
- ⁶⁰ ILO, ‘Observation (CEACR) on Convention No 29’, adopted 2024, published 113rd session, 2025. https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNT_RY_ID:4405672,103166.
- ⁶¹ ILO, ‘Observation (CEACR) on C105’, adopted 2024, published 113rd ILC session, 2025. https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNT_RY_ID:4405710,103166.
- ⁶² ILO, ‘Direct Request (CEACR) on Convention No 87’, adopted 2022, published 111st session, 2023. https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNT_RY_ID:4320814,103166.
- ⁶³ ILO, ‘Observation on Convention No 87’, adopted 2025, published in ‘Application of Labour Standards 2026’, Report of the Committee of Experts on the Application of Conventions and recommendations. <https://www.ilo.org/sites/default/files/2026-02/Report%20III%28A%29-2026-%5BNORMES-251223-001%5D-Web-EN.pdf>.
- ⁶⁴ The new Punjab Labour Code was adopted by the Provincial Assembly of Punjab in February 2026. <https://www.adalatonline.pk/laws/punjab-labour-code-2026/>. The new Sindh Labour Code has been subject to consultation, but has not yet been adopted by the Provincial Assembly of Sindh.
- ⁶⁵ ILO, ‘Observation (CEACR) on Convention No 87’, adopted 2025, published 114th ILC session, 2026. https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNT_RY_ID:4460815,103166.
- ⁶⁶ Section 19 of the Industrial Relations Act, 2012, and sections 24(1) of the Industrial Relations Acts of Khyber-Pakhtunkhwa, Punjab and Sindh.
- ⁶⁷ ILO, ‘Observation on Convention No 98’, adopted 2025, published in ‘Application of Labour Standards 2026’, Report of the Committee of Experts on the Application of Conventions and recommendations. <https://www.ilo.org/sites/default/files/2026-02/Report%20III%28A%29-2026-%5BNORMES-251223-001%5D-Web-EN.pdf>.
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- ⁷⁰ ILO, ‘Decent Work Country Programme for Pakistan (2023-27) (DWCP IV)’, 2023. https://www.ilo.org/sites/default/files/2024-03/ILO_Pakistan_DWCP%20WEB_v7_photos_FINAL_0.pdf.
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