

Submission to the Special Rapporteur on the Promotion and Protection of Human Rights in the context of Climate Change

Call for inputs: “Enhancing climate change legislation, support for climate change litigation and advancement of the principle of intergenerational justice”

Research Society of International Law (RSIL)
Climate & Environment Initiative (CEI)

About the Research Society of International Law

The Research Society of International Law is a private sector think tank based in Pakistan, seeking to develop provincial, federal, and international awareness regarding international law and human rights obligations and standards. The organisation’s philosophy is based on the view that greater awareness of international law improves the development of a State’s domestic and foreign policies and helps Pakistan remain compliant with its international commitments, thus solidifying its reputation as a responsible member of the international community.

To this end, RSIL engages in academic research, policy analysis and capacity building to inform the discourse on issues of national and international importance from a legal perspective and effect positive change in the domestic legal space. As RSIL is a non-partisan, apolitical institution, we provide legal analysis on the challenges facing Pakistan without engaging in partisanship or expressing any political biases.

The Climate & Environment Initiative (CEI) is an independent initiative at RSIL that explores legal solutions to climate change and environmental problems in Pakistan and globally. CEI has engaged in extensive research on Pakistan’s laws, policies and strategies relating to climate change and the connection between climate change and human rights in Pakistan.

About RSIL’s Submission

Pakistan occupies a unique front-line position with reference to climate change as despite contributing less than 1% to global fossil CO₂ emissions,¹ it is consistently among the ten most vulnerable countries to the impacts of climate change.² Pakistan faces multiple and compounding threats from receding Himalayan glaciers, increased variability of monsoon rainfall, sea level rise threatening low-lying coastal areas, decreased capacity of water reservoirs, and extreme weather events, including floods and droughts. In response, Pakistan is home to progressive climate change and environmental legislation and rich jurisprudence which incorporates human rights in environmental matters. This submission draws on climate change legislation, litigation and the extent to which the principle of intergenerational equity is advanced within Pakistan.

¹ IEA-EDGAR CO₂, a component of the EDGAR ([Emissions Database for Global Atmospheric Research](https://edgar.jrc.ec.europa.eu/)) Community GHG database version 7.0 (2022) including or based on data from IEA (2021) Greenhouse Gas Emissions from Energy, www.iea.org/data-and-statistics, as modified by the Joint Research Centre.

² David Eckstein, Vera Künzel and Laura Schäfer, ‘[The Global Climate Risk Index 2021](https://www.germanwatch.org/en/the-global-climate-risk-index-2021/)’ (Germanwatch 2021) <<https://bvearmb.do/handle/123456789/1306>> accessed 25 May 2023.

Enhancing Climate Change Legislation:

1. Can you provide examples of climate change legislation that incorporates human rights elements, or a reference to obligations relating to loss and damage?

Pakistan's climate change legislation consists of several laws and policies relating directly and indirectly to climate change. Annex I of this Submission includes a table of this legislation, providing information on the extent to which climate change, human rights, and loss and damage are incorporated in selected laws, policies and plans.

The Constitution of Pakistan, 1973 enshrines the fundamental rights provided to citizens of Pakistan. While the environment or climate are not mentioned in the Fundamental Rights in the Constitution, the rights to life³ and dignity⁴ have been interpreted to include environmental rights, especially the right to a healthy and clean environment.⁵ Similarly, the Constitution contains no Principles of Policy in relation to the environment. The only reference to the environment was in the Concurrent Legislative List in the Fourth Schedule, which outlines matters appropriate for both federal and provincial legislation and policies.⁶ This was changed by the 18th Amendment of the Constitution in 2010, which deleted the Concurrent Legislative List, devolving the environment to the provincial governments as a provincial legislative subject.

Pakistan's flagship legislation on climate change is the Pakistan Climate Change Act 2017, which is complemented by the National Climate Change Policy 2012 (updated in October 2021), the Framework for Implementation of the National Climate Change Policy 2013-2030, the Climate Change Gender Action Plan (ccGAP) 2022, and the working draft of the National Climate Resilience and Adaptation Plan 2023. The above laws, policies and plans deal directly with climate change and its impacts on Pakistan.

Only the National Climate Change Policy 2012 (updated 2021) and the Draft National Climate Resilience and Adaptation Plan 2023-2030 include the term 'loss and damage', while all of the above documents make oblique references to the negative consequences arising from unavoidable risks of climate change without explicitly using the term. In its chapter on Disaster Preparedness, the Climate Change Policy identifies the development of "an 'assessment and compensation mechanism' including insurance for loss and damage in the aftermath of disasters, and measures for infrastructure and soil rehabilitation" as a policy measure the Government of Pakistan is pursuing in collaboration with relevant entities. The Draft Adaptation Plan includes a more substantial reference to loss and damage with an independent section on Pakistan's experience with loss and damage and mention of the use of early warning systems in reducing the impacts of loss and damage. Given Pakistan's experience with the 2022 floods, it is likely that references to loss and damage and policy measures to mitigate it will only become more common in future policies and plans.

Similarly, the Climate Change Gender Action Plan (ccGAP) 2022 and the Draft National Climate Resilience and Adaptation Plan 2023-2030 are the only documents which use the term 'human rights'. In contrast, all documents include indirect references to human rights, including the rights to life, health, livelihood, property, and education. This Submission suggests the need to develop a methodology to assess human rights dimensions of legislation which acknowledges that Global South States may not use certain terminology but still include recognition of and policy measures to protect human rights.

3. How do you think climate change legislation should engage the concept of loss and damage?

³ Article 9, Constitution of the Islamic Republic of Pakistan, 1973.

⁴ Article 14, Constitution of the Islamic Republic of Pakistan, 1973.

⁵ See: *Shehla Zia v Federation of Pakistan* PLD, 1994 Supreme Court 693; and *Asghar Leghari v Federation of Pakistan*, Lahore High Court Writ Petition 25501 of 2015.

⁶ Parvez Hassan, *Changing Global Order: Role of Courts and Tribunals in Pakistan in Environmental Protection*, 44 *Envtl. Pol'y & L.* 64 (2014).

Loss and damage can be operationalised in Pakistan's Climate Change Act 2017 by expanding the scope of the existing Pakistan Climate Change Fund to allow funds to be utilised to provide compensation for loss and damage. Section 12 of the Act creates the Pakistan Climate Change Fund, which will include "monies received by the Fund in the form of donations, endowments, grants and gifts"; sums "raised by the Authority for the execution of the programmes and projects of Authority"; and monies payable to the Fund under any law.⁷ Outside of operational and administrative expenses, the Fund is established to provide "financial assistance to suitable adaptation and mitigation projects and measures designed to combat the adverse effects of climate change, the sustainable development of resources, and for research in any aspect of climate change".⁸ The list of permitted uses of the resources in the Fund can be expanded through an amendment to include compensation for losses and damages incurred as a result of unavoidable consequences of climate change. These funds could be provided to local governments to fund reconstruction and resilience efforts in communities in their jurisdiction experiencing the worst loss and damage.

The Fund is managed by the Pakistan Climate Change Authority,⁹ which is bound by the guidelines framed by the Pakistan Climate Change Council on projects eligible to receive financial assistance.¹⁰ Thus, having a loss and damage expert on the Council could help incorporate loss and damage considerations into institutional guidelines on the utilisation of funds. This intervention is possible without amendments to the law as up to thirty members may be appointed to the Council by the Prime Minister. These members may include representatives of the Chambers of Commerce and Industry; non-governmental organisations concerned with climate change, the environment, and development; scientists; researchers; technical experts; and educationists.

Supporting Climate Change Litigation:

5. How are human rights considerations being incorporated into climate change litigation?

Despite the existence of progressive legislation on climate change in Pakistan, environmental protection has not been a priority matter of national policy. Consequently, Environmental Protection Agencies do not act; and Environmental Tribunals are under-resourced, resulting in a significant lack of enforcement.¹¹ The low-priority attitude towards the environment by the legislature and the lack of political will of the executive has left a gap that is filled by the Pakistani judiciary. As such, Pakistan provides an example for other jurisdictions on the protection of the environment and climate justice through public interest litigation, and has been recognised as such by several academics.

Public interest litigation has been facilitated by the High Courts and the Supreme Court of Pakistan (collectively referred to as 'superior courts'). Under Article 199 of the Constitution, the various High Courts have writ jurisdiction to enforce fundamental rights in their provincial jurisdictions. Under Article 184(3), the Supreme Court has original jurisdiction to hear cases pertaining to fundamental rights violations that are of 'public importance'. These Articles have been frequently invoked for the *suo moto* jurisdiction of the superior courts. Despite the creation of Environmental Tribunals under the Environmental Protection Act 1997¹² and its provincial counterparts (following the devolution of the environment to a provincial level under the 18th Amendment), the majority of Pakistan's environmental jurisprudence has originated from

⁷ Section 12(2), Pakistan Climate Change Act 2017.

⁸ Section 12(3), Pakistan Climate Change Act 2017.

⁹ Established under Section 5, Pakistan Climate Change Act 2017.

¹⁰ Established under Section 3, Pakistan Climate Change Act 2017.

¹¹ Parvez Hassan, The Role of the Judiciary and Judicial Commissions on Sustainable Development Issues in Pakistan, Paper presented at the International Judicial Conference organised by the Supreme Court of Pakistan during its Golden Jubilee Celebrations from 11-14 August, 2006.

¹² Section 20, Environmental Protection Act 1997.

the superior courts. This may be due, in part, to the liberal response of the superior courts to cases on environmental matters, especially with respect to *locus standi* of petitioners.

The involvement of the judiciary in environmental matters in Pakistan dates back to the landmark case of *Shehla Zia v WAPDA*,¹³ which established that despite the absence of a fundamental right to the environment in the Constitution of Pakistan, the right to a clean and healthy environment was included in the fundamental rights to life and dignity guaranteed under Articles 9 and 14 of the Constitution respectively.¹⁴ The *Shehla Zia* petition directly invoked the original jurisdiction of the Supreme Court of Pakistan under Article 184(3) of the Constitution. The case also pioneered the use of judicial commissions in Pakistan to tackle complex environmental issues.¹⁵ Moreover, the decision in *Shehla Zia* incorporated the precautionary principle from international environmental law into Pakistani jurisprudence with a direct reference to the Rio Declaration.¹⁶ This Submission suggests that the incorporation of international environmental legal principles, including those relating to climate change and human rights, can be successfully achieved through climate litigation in jurisdictions similar to Pakistan.

Similarly, the establishment of Judicial Commissions to investigate issues and provide recommendations on climate change and human rights matters presents a unique opportunity to provide scientific solutions outside the expertise of the Courts. This can promote “a non-adversarial, public-private partnership model for handling the most intractable civic problems.”¹⁷ These Commissions provide the opportunity for broad participation of stakeholders, involving site visits and public hearings, allowing the adoption of consensus recommendations.¹⁸ One notable example is the case of *Syed Mansoor Ali Shah v Government of Punjab*,¹⁹ which concerned the severe effect of degraded air quality on human life. In this case, the High Court established the Lahore Clean Air Commission with sub-committees to explore clean fuel, rickshaws, public transport and coordination with local councils. This judgement is significant as it also established a Standing Body of the Commission which remained in operation until the recommendations of the Commission were implemented. Other notable examples of successful Commissions where recommendations were adopted and later accepted by the relevant Court include *City District Government v Muhammad Yousaf*,²⁰ which concerned the suitability of a site for dumping solid wastes, and *General Secretary, West Pakistan Salt Mines Labour Union (CBA) Khewra, Jhelum v Director, Industries and Mineral Development, Punjab, Lahore*,²¹ which concerned pollution of water sources by mining activities infringing on the right to life of nearby residents.²² Jurisdictions similar to Pakistan which struggle with the enforcement of judicial decisions may benefit from the adoption of this practice of Standing Bodies and judicial oversight to ensure compliance and enforcement of public-interest litigation judgements.

Public interest climate litigation in Pakistan has also provided citizens with an avenue to enforce climate-specific policies and existing environmental laws and policies. In *Asghar Leghari v Federation of Pakistan*,²³ the petitioner, an aggrieved farmer, approached the Court over the Government’s inaction in implementing the National Climate Change Policy 2012 and the Framework for Implementation of Climate

¹³ PLD 1994 Supreme Court 693.

¹⁴ *Ibid.*

¹⁵ Parvez Hassan, *Judicial Commissions and Climate Justice in Pakistan*, A paper presented at the Asia Pacific Judicial Colloquium on Climate Change: Using Constitutions to Advance Environmental Rights and Achieve Climate Justice, Pearl Continental Hotel, Lahore, Pakistan, 26-27 February 2018.

¹⁶ PLD 1994 Supreme Court 693.

¹⁷ Parvez Hassan, *Judicial Commissions and Climate Justice in Pakistan*, A paper presented at the Asia Pacific Judicial Colloquium on Climate Change: Using Constitutions to Advance Environmental Rights and Achieve Climate Justice, Pearl Continental Hotel, Lahore, Pakistan, 26-27 February 2018.

¹⁸ *Ibid.*

¹⁹ 2007 CLD 533; Writ Petition No. 6927 of 1997 filed before the Lahore High Court

²⁰ I.C.A No. 798 of 2002 filed before the Lahore High Court.

²¹ 1994 SCMR 2061.

²² Parvez Hassan, *Judicial Commissions and Climate Justice in Pakistan*, A paper presented at the Asia Pacific Judicial Colloquium on Climate Change: Using Constitutions to Advance Environmental Rights and Achieve Climate Justice, Pearl Continental Hotel, Lahore, Pakistan, 26-27 February 2018.

²³ PLD 2016 Lahore 364.

Change Policy 2014-2030. He argued that this inaction posed an “immediate and serious threat” to his right to life under Article 9 and right to dignity under Article 14 of the Constitution.²⁴ The Court established the aforementioned Climate Change Commission which included 30 members of government departments at both the federal and provincial level, lawyers, representatives from the media, academics, and representatives from environmental NGOs.²⁵ At the time of its final report submission, the Commission had supported the implementation of 66% of the Priority Actions of the National Climate Change Policy.²⁶ The Court also established a Standing Committee on Climate Change as a “link between the Court and the Executive” to facilitate future work on climate change.²⁷ Several petitions have been brought forward following the success of the *Asghar Leghari* case. One notable example is *Maria Khan v Federation of Pakistan*,²⁸ filed by a coalition of women on their behalf and on behalf of future generations (which is pending before the Lahore High Court). They allege that the Federal Government’s inaction on climate change mitigation violated their fundamental rights, including the right to a clean and healthy environment.

Climate litigation in Pakistan demonstrates the courts' capacity to serve as a platform for advancing claims related to climate change which affects fundamental human rights. The effectiveness of Commissions as a means of resolving intricate environmental and climate change disputes also offers valuable insights that can be applied in other jurisdictions. Moreover, these Commissions facilitate enhanced public engagement in climate change decisions through on-site visits and consultations and promote cooperative problem-solving between the State, citizens, technical experts and the private sector, which might explain their proliferation in Pakistan.

Advancement of the principle of intergenerational justice:

14. Has the concept of intergenerational justice been incorporated into climate change litigation?

The concept of intergenerational justice has been incorporated into climate change litigation in Pakistan through progressive judicial interpretation. The terms ‘intergenerational justice’ and ‘intergenerational equity’ are often cited as part of a set of international environmental principles, such as sustainable development, the precautionary principle, the obligation to conduct environmental impact assessments, and the public trust doctrine.

In *Asghar Leghari v Federation of Pakistan*,²⁹ the Lahore High Court interpreted the right to sustainable development and environmental protection as part of two fundamental rights: the right to life under Article 9 and the right to human dignity under Article 14. The reference to Article 9 incorporated the expansive interpretation of the Article in *Shehla Zia* to include the right to a healthy and clean environment. Under these Articles, the Pakistani State is obliged to observe ‘the international environmental principles of sustainable development, precautionary principle, environmental impact assessment, inter and intra-generational equity and public trust doctrine.’³⁰

This pattern has been observed in other cases as well, indicating a tendency of the Courts to expansively interpret the Constitution. In *Maple Leaf Cement Factory Ltd. v Environmental Protection Agency*,³¹ the Lahore High Court interpreted the term ‘sustainable development’ as defined under section 2(xlii) of the

²⁴ Ibid.

²⁵ Birsha Ohdedar, ‘Litigating Climate Change in India and Pakistan: Analysing Opportunities and Challenges’ in Ivano Alogna, Christine Bakker and Jean-Paul Gaucci (eds), *Climate Change Litigation Global Perspectives* (BRILL, 2021).

²⁶ Parvez Hassan, *Judicial Commissions and Climate Justice in Pakistan*, A paper presented at the Asia Pacific Judicial Colloquium on Climate Change: Using Constitutions to Advance Environmental Rights and Achieve Climate Justice, Pearl Continental Hotel, Lahore, Pakistan, 26-27 February 2018.

²⁷ Birsha Ohdedar, ‘Litigating Climate Change in India and Pakistan: Analysing Opportunities and Challenges’ in Ivano Alogna, Christine Bakker and Jean-Paul Gaucci (eds), *Climate Change Litigation Global Perspectives* (BRILL, 2021).

²⁸ Writ Petition 8960/2019 (Lahore High Court).

²⁹ PLD 2016 Lahore 364.

³⁰ Ibid.

³¹ PLD 2018 Lahore 255.

Punjab Environmental Protection Act 1997 as having four elements. One of these elements is ‘intergenerational equity’, which the Court defines as “the need to preserve natural resources for the benefit of future generations.”³² Similarly, natural resources must be equitably used by taking into account the needs of other states.³³

Likewise, in *Muhammad Asif v Superintendent of Police and others*,³⁴ the concept of intergenerational equity was read in line with the public trust doctrine to form the foundational principles of sustainable development. As one of the many international environmental legal principles frequently cited by the Pakistani judiciary, the public trust doctrine entails that natural resources should be preserved for the benefit of the public. In this case, the doctrine was connected to intergenerational equity to include future generations in the definition of ‘the public’, entitling future generations to the sustainable use of natural resources. The judgement reinforced the position taken by the Court in *Asghar Leghari*.

In *D.G. Khan Cement Company Ltd v Government of Punjab through Chief Secretary, Lahore and others*,³⁵ the Supreme Court provided an authoritative description of intergenerational justice, linking it to climate democracy. The Court highlighted the need to take into account the impact of legal decisions on ‘the great silent majority of future generations.’³⁶ The Court acknowledged its duty in reducing the effects of climate change for generations to come and ‘upholding climate justice at all times’. The link between intergenerational justice and sustainable development was further reinforced in this judgement as well.

Thus, these cases serve as examples of the invocation of the principle of intergenerational equity or justice to climate change and human rights. The courts have been proactive in drawing a connection between sustainable development and a right to a clean and healthy environment, which have both been linked to Articles 9 and 14 of the Constitution. Given this link, the notion of intergenerational justice has been interpreted as an important consideration in climate justice.

17. Can you share some good practices that allow youth to be represented in courts and to have their views and concerns properly expressed in the judicial process?

As noted earlier, Article 184(3) of the Constitution of Pakistan grants the Supreme Court original jurisdiction over cases of public importance regarding violations of fundamental rights. This jurisdiction has been invoked by youth parties, such as in *Ali v Federation of Pakistan*.³⁷ In this case, Rabab Ali, a 7-year-old girl from Karachi, alleged violations of her fundamental rights due to CO₂ emissions caused by the burning of coal for electricity generation. Her petition highlighted that choosing to depend on and develop coal as an energy source instead of renewable energy sources risks “ignoring the long-term adverse consequences they are bringing upon both current and future generations of Pakistanis, in violation of their Fundamental Rights.”³⁸ The petition further highlighted the State’s failure in adhering to the National Climate Change Policy of 2012.³⁹ The petition makes repeated mention of the rights of ‘future generations who will have to endure the inherited Environment degraded by the choices made by current generations’.⁴⁰ This petition is currently still pending before the Supreme Court.

While the above petition is currently the only example of the youth being explicitly represented in courts, Article 184(3) has been interpreted to grant the Supreme Court *suo moto* jurisdiction to take up cases on its

³² Ibid.

³³ Ibid.

³⁴ PLD 2020 Lahore 137.

³⁵ 2021 SCMR 834.

³⁶ Ibid.

³⁷ The Supreme Court of Pakistan, *Ali v. Pakistan*, petition filed on 1 April 2016 (case still pending).

³⁸ *Ali v Pakistan*, 23.

³⁹ Ibid.

⁴⁰ Ibid.

own initiative, without requiring a formal petition. This power has been used in the past to take up cases on pressing issues of fundamental rights brought to the Supreme Court's attention, such as the practice of bonded labour. In *Darshan Masih v the State*,⁴¹ the Supreme Court initiated a case based on a telegram written by an 11-year-old bonded labourer in a brick kiln in Punjab. The Court outlawed the practice of bonded labour as a violation of the prohibition of slavery and forced labour under Article 11 of the Constitution. Thus, this precedent allows the Supreme Court to take up cases pertaining to the impact of climate change on future generations, particularly given the already-established connection between sustainable development and intergenerational equity.

⁴¹ PLD 1990 SC 513.

Annex I

Legislation (Laws, Policies & Plans)	Inclusion of the Term 'Climate Change'	Reference To Climate Change (Including Impacts)	Inclusion Of the Term 'Loss and Damage'	Reference To Loss and Damage	Inclusion of the Term 'Human Rights'	Reference to International Obligations	Indirect Reference to Human Rights	Status
Pakistan Climate Change Act 2017	YES	YES	NO	YES ("loss of lives and colossal damage to the economy" included in <i>Statement of Objects and Reasons</i>)	NO	YES (Included in <i>Section 4(1)(d) & (e)</i> : Functions and powers of the Council and <i>Section 8(1)(a), (d), (f), (k), (m)</i> : Functions of the Authority and Statement of Objects and Reasons)	YES (Included in <i>Section 8(3)</i> : "Authority to be guided by socio-economic development objectives")	IN FORCE

National Climate Change Policy 2012 (updated in 2021)	YES	YES	YES (Included in Chapter 4.7 Disaster Preparedness)	YES (Loss of lives, economic losses, damage to property and infrastructure referred to throughout the document)	NO	YES (SDGs included in <i>Chapter 4.8</i> Socio-economic Measures. International commitments included in <i>Chapter 6: Capacity Building and Institutional Strengthening</i> , <i>Chapter 8: International and Regional Cooperation</i> , & <i>Chapter 9: Finance</i>)	YES (Reference to human life, health, property, livelihoods in <i>Chapter 4: Climate Change Adaptation</i> , <i>Chapter 4.3: Human Health</i> , <i>Chapter 4.4: Forestry</i> , <i>Chapter 4.8: Socio-economic measures</i>)	IN FORCE UPDATED IN OCTOBER 2021
---	-----	-----	--	--	----	--	---	---

Framework for Implementation of Climate Change Policy (2014 - 2030)	YES	YES	NO	YES (Annex III outlines loss and damage from serious floods during the last 40 years in Pakistan, also referred to in <i>Chapter 10.3: Coastal and Marine Ecosystems: Adaptation Actions</i>)	NO	YES (References to UNFCCC in Introduction, <i>Chapter 3.5: Climate Compatible Development & Climate Finance</i> , <i>Chapter 8.0: Forestry Sector: Mitigation Actions</i>)	YES (human costs of climate disasters <i>Chapter 3.4: Climate Compatible Development & Climate Finance</i> . Health mentioned in <i>Chapter 3.6: Gender Dimensions of Climate Risk & Resilience</i> , <i>Chapter 10.7: Health Sector: Adaptation Actions</i> . Human vulnerability to disasters discussed in <i>Chapter 9.0: Disaster preparedness: Adaptation Actions</i>)	IN FORCE PUBLISHED IN 2013
---	-----	-----	----	---	----	--	---	-----------------------------------

Climate Change Gender Action Plan of the Government and People of Pakistan 2022	YES	YES	NO	YES (Loss of life and human suffering discussed in Introduction, economic losses discussed in <i>Chapter 1: Disaster Risk Reduction</i>)	YES (included with reference to the UNGA Res 64/292 on human right to water and sanitation and in the Agriculture and food security Chapter 2)	YES (References to UNFCCC, SDGs, Paris Agreement and other international conventions and agreements)	YES (References made to rights in the Gender sections of the Plan, loss of life in Introduction, health, sanitation, livelihoods, property, wellbeing, welfare, education mentioned at may points,	PUBLISHED IN 2022
---	-----	-----	----	--	---	---	---	-------------------

National Climate Resilience and Adaptation Plan 2023-2030	YES	YES	YES	YES	YES	YES	YES	WORKING DRAFT
			<p>(Chapter on Loss and Damage and explicit mention of loss and damage in Response and Reclamation Chapter, and Chapter 6: Resource Mobilisation)</p>	<p>(Displacement, loss of homes and livestock, fatalities to lives and livelihoods included in Chapter 1: National Circumstances: Introduction</p> <p>Economic loss mentioned in Climate Change in Pakistan & Issues and Challenges sub-Chapter.</p> <p>Losses mentioned in Chapter on Disaster Preparedness)</p>	<p>(Ministry of Human Rights Responsible for Implementation of Adaptation Action Plan relating to Gender)</p>	<p>(SDGs included in guidelines for NAP formulation.</p> <p>UNFCCC, Paris Agreement, SDGs referenced under International Cooperation Strategy, and incorporated throughout Chapters on Biodiversity, Water, and Health)</p>	<p>(Health, impact on life and property mentioned at many points)</p>	