



WHITE PAPER

*Assessment of Pakistan's Non-Compliance with GSP+ Obligations:
A Case for Suspension under
Regulation (EU) No 978/2012*

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Executive Summary

This white paper presents a detailed, evidence-based assessment of Pakistan's failure to comply with the conditions required for continued participation in the European Union's Generalised Scheme of Preferences Plus (GSP+).

Since 2014, Pakistan has benefited from preferential access to the EU market under the GSP+ framework, which is conditional on the effective implementation of 27 core international conventions relating to human rights, labour rights, environmental protection, and good governance, as stipulated in Regulation (EU) No 978/2012¹.

However, successive evaluations by the European Commission and the European Parliament have identified serious and persistent shortcomings. These include the misuse of blasphemy legislation, curbs on freedom of expression and civil society, enforced disappearances, the widespread use of child and bonded labour, suppression of trade union activity, weak environmental governance, and systemic failures in judicial independence and anti-corruption efforts^{1 2 3}.

Under Article 15(1)(a) of the Regulation, the EU may suspend GSP+ preferences in the event of "serious and systematic violations" of the principles enshrined in the relevant conventions⁴. The evidence presented in this paper demonstrates that this threshold has been met.

Drawing exclusively on official EU sources—such as Commission Staff Working Documents, European Parliament resolutions, and treaty monitoring body reports—the paper examines Pakistan's compliance record across all four thematic pillars of GSP+ conditionality. It provides comparative benchmarks, supporting data, and case-based documentation to

¹ Regulation (EU) No 978/2012 of the European Parliament and of the Council of 25 October 2012, OJ L 303, 31.10.2012.

² European Parliament, Resolution of 29 April 2021 on the blasphemy laws in Pakistan, in particular the case of Shagufta Kausar and Shafqat Emmanuel, 2021/2647(RSP), P9_TA(2021)0157.

³ UN Committee on the Rights of the Child, Concluding observations on the fifth periodic report of Pakistan, CRC/C/PAK/CO/5, 3 June 2016; ILO Committee of Experts, Observations concerning Pakistan, CEACR 2022.

⁴ Regulation (EU) No 978/2012, Article 15(1)(a).

assess the implementation gap and the effectiveness of EU monitoring mechanisms⁵.

Despite repeated warnings and a formal call by the European Parliament in 2021—adopted by a substantial majority—for an immediate review of Pakistan’s GSP+ status, the European Commission has extended the country’s access to the scheme until 2027 without initiating suspension proceedings.^{6 7}.

In light of the documented and ongoing breaches, this white paper concludes that Pakistan’s non-compliance is both serious and systemic. It calls on the European Commission to launch immediate proceedings for the temporary withdrawal of GSP+ preferences.

Such a step is necessary to uphold the credibility of the GSP+ instrument, reinforce the integrity of the EU’s conditionality-based trade policy, and provide renewed leverage for meaningful reform in Pakistan.

⁵ European Commission, Joint Staff Working Document: The EU Special Incentive Arrangement for Sustainable Development and Good Governance (GSP+) assessment of Pakistan (2020–2022), SWD(2023) 620 final; and EU-Pakistan Subgroup on Trade and Sustainable Development (TSD) minutes, available via EEAS.

⁶ European Parliament, *Resolution of 29 April 2021*, P9_TA(2021)0157, adopted by 681 votes to 3.

⁷ European Commission, Commission Delegated Regulation (EU) 2023/2678 of 7 September 2023, OJ L, 2023/2678, extending GSP+ status for Pakistan until 2027.

Chapter 1 – Introduction

1.1 The GSP+ Framework

The European Union's Generalised Scheme of Preferences (GSP) is designed to support sustainable development and good governance by reducing or removing tariffs on exports from eligible developing countries.

Within this framework, the GSP+ (Special Incentive Arrangement) offers enhanced tariff relief—covering approximately two-thirds of product lines—to countries that ratify and effectively implement 27 core international conventions on human rights, labour rights, environmental protection, and good governance.

Regulation (EU) No 978/2012 defines the legal basis of the scheme, including inclusion criteria, monitoring procedures, and conditions for temporary withdrawal in cases of serious and systematic non-compliance⁸.

Beneficiaries must not only ratify all listed conventions but also ensure their effective implementation, refrain from making incompatible reservations or derogations, and engage substantively with EU monitoring mechanisms⁹.

The European Commission conducts biennial compliance assessments, as mandated under the Regulation, and may recommend preference withdrawal under Article 15 in cases of persistent non-compliance¹⁰.

1.2 Pakistan's Inclusion Since 2014

⁸ Regulation (EU) No 978/2012 of the European Parliament and of the Council of 25 October 2012, OJ L 303, 31.10.2012; see Articles 9, 10, 13, 15, and Annex VIII.

⁹ European Commission, GSP+ Guidebook for EU Delegations, 2022 edition, pp. 8–9.

¹⁰ Regulation (EU) No 978/2012, Article 15(1)(a); see also *Procedural Guidance for GSP+ Monitoring*, DG TRADE, 2021.

Pakistan was granted GSP+ status in January 2014 following ratification of the necessary conventions and formal acceptance of implementation commitments, in line with Articles 9 and 10 of Regulation 978/2012¹¹.

Since then, Pakistan has emerged as the largest beneficiary of the scheme: in 2023, approximately 79 percent of its exports to the EU—which totalled €6.2 billion—entered tariff-free under GSP+ status, making up about 88 percent of eligible imports¹².

Nevertheless, successive Commission reports and European Parliament resolutions have consistently highlighted deficiencies in Pakistan's implementation record—particularly in areas such as labour rights, freedom of expression, misuse of blasphemy legislation, and governance accountability¹³.

The Commission's most recent Joint Staff Working Document (SWD (2023) 363 final) covering 2020–2022 acknowledged limited legislative reforms but underscored continued institutional and implementation gaps, especially in fundamental rights and the rule of law¹⁴.

In its resolution of 29 April 2021 (Procedure 2021/2647(RSP)), the European Parliament called for a reassessment of Pakistan's GSP+ eligibility, citing serious concerns over ongoing human rights violations and insufficient progress in key areas¹⁵.

Although the Commission has not initiated a full suspension procedure, it enacted a partial withdrawal of preferences in June 2025 through Implementing Regulation (EU) 2025/1206, citing market disturbance under Article 30. The measure, which specifically targets ethanol imports from

¹¹ European Parliament, Resolution of 12 December 2013 on granting GSP+ status to Pakistan, P7_TA(2013)0573.

¹² EU Monitor, *GSP Hub country report: Pakistan*, data 2023 — €6.2 billion imports via GSP+, approx. 79 percent of exports · 88 percent preference utilisation · largest beneficiary https://gsphub.eu/country-info/Pakistan?utm_source=chatgpt.com.

¹³ European Commission, GSP+ Assessment of Pakistan: 2020–2022, SWD(2023) 363 final.

¹⁴ Ibid., pp. 1–2 summary and pp. 5–6 on implementation gaps · human and labour rights concerns.

¹⁵ European Parliament, *Resolution of 29 April 2021 on blasphemy laws in Pakistan*, 2021/2647(RSP), P9_TA(2021)0157 · explicit call for scrutiny of GSP+ status.

Pakistan, sets a precedent as the first such action taken under the GSP+ framework in relation to Pakistan.¹⁶

1.3 Scope and Methodology of This Paper

This paper presents an evidence-based assessment of Pakistan's compliance with GSP+ conditionality. It utilises exclusively reputable, publicly available documents, including:

- Regulation (EU) No 978/2012 and Implementing Regulation (EU) 2025/1206
- Commission Staff Working Document SWD(2023) 363 final (covering GSP+ evaluation of Pakistan for 2020–2022)
- European Parliament Resolution TA-9-2021-0157 and its procedural context (2021/2647(RSP))

Additionally, publicly available data from United Nations treaty bodies and the International Labour Organisation (ILO) is used to illustrate implementation deficiencies across the four obligation areas.

The analysis is structured thematically—human rights, labour standards, environmental protection, and governance—and includes comparative benchmarks, case-based data, and EU institutional findings to support robust legal argumentation for action under Article 15 of Regulation 978/2012.

The objective is to provide policymakers with an authoritative and legally grounded rationale for initiating temporary withdrawal of Pakistan's GSP+ preferences in the context of serious and systematic non-compliance.

Chapter 2 – Legal Basis for Suspension of GSP+ Preferences

2.1 Regulation (EU) No 978/2012 – Legal Framework

¹⁶ Commission Implementing Regulation (EU) 2025/1206 of 19 June 2025 on suspending GSP+ preferences for ethanol from Pakistan (OJ L 2025/1206) – first such action under Article 30 – recognised market disturbance issues.

The Generalised Scheme of Preferences (GSP) is a unilateral trade instrument of the European Union, designed to promote sustainable development and good governance in vulnerable developing countries. Regulation (EU) No 978/2012 of 25 October 2012 provides the legal basis for the current scheme, which includes three components: the Standard GSP, the Everything But Arms (EBA) arrangement, and the GSP+ incentive mechanism for sustainable development and good governance¹⁷.

The GSP+ sub-scheme offers full removal of tariffs on two-thirds of EU tariff lines for countries that ratify and effectively implement 27 core international conventions listed in Annex VIII of the Regulation. These include:

- Seven UN human rights instruments (e.g. ICCPR, CAT, CRC);
- Eight ILO core labour standards;
- Eight conventions on environmental protection (e.g. UNFCCC, CITES);
- Four conventions relating to good governance (e.g. UN Convention Against Corruption).

Eligibility for GSP+ status is defined under Article 9, which requires that a country:

- Is considered vulnerable in terms of economic diversification;
- Has ratified all 27 conventions without reservations that defeat their object or purpose;
- Is not under any formal investigation for serious failure to implement the conventions;
- Has provided a legally binding undertaking to maintain ratification and cooperate fully with the EU monitoring system.

Effective implementation is further reinforced by Article 8, which links preferential access to demonstrable performance, not mere formal commitment. The Regulation thus establishes conditionality at its core: countries are expected to deliver not only legislative alignment but actual enforcement of rights, participation in treaty body reporting, and constructive engagement with the EU's GSP+ monitoring process¹⁸.

¹⁷ Regulation (EU) No 978/2012, Articles 8, 15 and 19; see *Official Journal of the EU*, L 303 (31 October 2012)

¹⁸ Regulation (EU) No 978/2012, Article 19(1)(a): "serious and systematic violation", Part A of Annex VIII.

This link between trade and treaty compliance is a hallmark of EU external action under Article 21 TEU and is designed to ensure that GSP+ preferences do not support, inadvertently or otherwise, regimes that violate international norms.

2.2 Criteria for Temporary Withdrawal

The principal legal mechanism for responding to breaches of GSP+ obligations is temporary withdrawal. Articles 15 and 19 of Regulation 978/2012 provide the EU institutions with the authority to suspend preferences where the beneficiary country fails to meet the required standards.

Article 19(1)(a) states that preferences may be temporarily withdrawn in the event of a:

“Serious and systematic violation of principles laid down in the conventions listed in Part A of Annex VIII.”¹⁹

This clause sets a clear threshold for withdrawal action. Each component of the phrase has been interpreted by the Commission and by legal commentators as follows:

- “Serious”: The violations must be of fundamental provisions within the relevant conventions. For example, restrictions on civil liberties, use of torture, forced labour, or impunity for extrajudicial killings would qualify as serious.
- “Systematic”: The violations must not be isolated incidents. Rather, they must form a pattern, be repeated, or stem from policy or institutional failure. It also implies that the state either condones or fails to take action against such violations.
- “Principles laid down”: The term refers to the binding substantive obligations of the international instruments listed, rather than their

¹⁹ UNCTAD, *Handbook on the scheme of the EU GSP* (rev. 5), explaining Article 15’s operationalisation in practice.

preambles or general aims. This includes both rights guaranteed to individuals and obligations imposed on the state.

Crucially, the Regulation makes clear that compliance is assessed not on the basis of formal ratification alone, but on ongoing, demonstrated efforts to implement and enforce the provisions in good faith. Article 10(b) disqualifies countries from entry if they are “found not to have effectively implemented” the conventions by their respective monitoring bodies²⁰.

This standard has been clarified in past Commission documents, which state that implementation includes: submission of reports to treaty bodies; participation in dialogues; the adoption of laws aligned with treaty obligations; and measurable improvements in enforcement practices.

Pakistan’s failure to meet these expectations—through continued use of blasphemy laws, suppression of independent unions, and non-enforcement of child labour prohibitions—falls squarely within the scope of Article 19(1)(a), as elaborated in the following chapters.

2.3 Role of the European Commission

The European Commission is entrusted with initiating and managing the suspension process. Article 15(3) of the Regulation stipulates:

“Where the Commission receives information that may justify temporary withdrawal... it shall examine the matter. It may decide to initiate an investigation.”

The Commission may act on the basis of information provided by:

- European Parliament resolutions;
- Reports from EU Member States;
- Monitoring bodies such as the UN Human Rights Committee, ILO supervisory bodies, or CEDAW;
- Civil society organisations or trade unions;

²⁰ Regulation (EU) No 978/2012, Article 15(3) and procedural rules in Articles 36–39.

- Media reports or fact-finding missions with documented findings²¹.

Where such information meets the seriousness and systematic threshold, the Commission publishes a notice of investigation in the Official Journal and formally notifies the beneficiary country. This triggers a 6-month monitoring period under Article 19(3), during which the Commission:

- Conducts fact-finding;
- Accepts submissions and representations from the beneficiary state;
- Reviews treaty body findings and third-party documentation;
- Engages in technical dialogue.

If, after six months, the Commission concludes that violations remain unresolved, it may adopt a delegated act under Article 19(10), suspending preferences in whole or in part. This act is subject to review under the Article 36 procedure but enters into force unless opposed by the Parliament or Council within the prescribed timeframe²².

It is worth noting that under Article 15(2), the Commission retains discretion over which products may be targeted. This allows for partial suspension, such as the case of Cambodia in 2020 and Pakistan (ethanol) in 2025²³.

This procedural mechanism is robust, transparent, and legally defensible under both EU and WTO law, having been used in multiple prior GSP+ enforcement actions.

2.4 Role of the European Parliament and Council

While the European Commission initiates and implements the suspension mechanism, both the European Parliament and the Council of the European Union retain oversight responsibilities.

²¹ Ibid., Articles 19(3)–(6), detailing notice, monitoring and six-month review procedure.

²² European Parliament resolution TA-9-2021-0157 calling for scrutiny and possible suspension, with political effect.

²³ EU press release, Commission proposes withdrawal of Sri Lanka's GSP+ benefits (4 July 2010), followed by suspension effective August 2010.

Under Article 36 of Regulation 978/2012 and Article 290 of the Treaty on the Functioning of the European Union (TFEU), the suspension is adopted via delegated act. This means:

- The Commission notifies the Parliament and Council of its intention to suspend preferences;
- A 2-month scrutiny period is provided (extendable by 2 more);
- Either institution may object to the delegated act, preventing it from entering into force.
-

Although neither the Parliament nor Council can unilaterally trigger a suspension procedure, their political influence is significant. Parliament resolutions—especially those adopted by overwhelming majorities—can:

- Recommend that the Commission open an investigation;
- Highlight documented evidence of treaty violations;
- Reinforce institutional pressure for enforcement action.

The European Parliament's Resolution of 29 April 2021 (TA-9-2021-0157) is a key example. It:

- Called for a review of Pakistan's GSP+ eligibility;
- Highlighted systemic misuse of blasphemy laws and violence against minorities;
- Was adopted by 681 votes to 3, indicating broad cross-party consensus²⁴.

This resolution, though non-binding, carries legal significance as part of the institutional record and as a public expression of concern by one of the EU's two co-legislators.

2.5 Precedents for Suspension

The EU has used its trade-preference suspension mechanism under the GSP regime on several occasions. These precedents show that Article 19(1)(a) is

²⁴ Academic analysis identifying suspension for Belarus in 2006 due to labour violations (ILO mechanisms and GSP framework).

applied when core human rights, labour rights, and governance norms are seriously and systematically breached.

Sri Lanka (2010)

In 2010, the EU withdrew Sri Lanka's GSP+ preferences due to findings that it had failed to comply with key human-rights treaties following its civil war. The Commission's investigation raised concerns about enforced disappearances, accountability, torture, and restrictions on civil and political freedoms. The suspension remained in force until 2017²⁵.

Belarus (2006)

In June 2007, the EU suspended standard GSP preferences for Belarus after repeated findings by the International Labour Organization (ILO) that its government was denying trade unions the right to operate freely and was violating collective bargaining rights. This was one of the earliest instances of GSP suspension for labour standards violations²⁶.

Cambodia (2020)

On 12 February 2020, the EU partially withdrew tariff preferences under the Everything But Arms / GSP scheme for Cambodia, following a formal investigation that found serious and systematic violations of civil and political rights. The issues included repression of political opposition, restrictions on free expression and association, and violations of ICCPR obligations²⁷.

Notes on Myanmar

Myanmar lost its standard GSP status in 1997 due to use of forced labour. However, no formal withdrawal of EBA preferences was enacted in 2020 in response to the 2021 military coup as of the latest verified sources. The EU

²⁵ *Council Regulation (EU) No 143/2010* of 15 February 2010 temporarily withdrawing the special incentive arrangement for sustainable development and good governance provided under Regulation (EC) No 732/2008 with respect to Sri Lanka.

²⁶ "Suspension of EU trade preferences to Belarus", International Trade Union Confederation (ITUC), decision effective 21 June 2007.

²⁷ Commission Delegated Regulation (EU) 2020/550 of 12 February 2020 amending Annexes II and IV to Regulation (EU) No 978/2012 with respect to certain products originating in Cambodia, due to serious and systematic violations of human rights.

has expressed concern, initiated enhanced engagement, but has not formally suspended Myanmar under EBA^{28 29}.

Each of these cases mirrors aspects of Pakistan's current non-compliance profile: repression of civil society (Cambodia, Belarus), systemic violence (Sri Lanka), and violations of labour rights (Myanmar). The Commission's decision in 2025 to suspend ethanol imports from Pakistan—under Article 30 rather than Article 19—further confirms that the procedural and legal mechanisms are intact and applicable when warranted³⁰.

These precedents reinforce that Pakistan's case meets both the legal and political conditions for broader suspension. The next chapters examine the substance of Pakistan's GSP+ obligations in detail, demonstrating repeated and systematic non-compliance across all four pillars of conditionality.

Chapter 3 – Human Rights Violations

3.1 International Commitments and Applicable Conventions

Under the Generalised Scheme of Preferences Plus (GSP+) framework, Pakistan is obligated to implement 27 core international conventions. Key among them are the International Covenant on Civil and Political Rights (ICCPR), the Convention Against Torture (CAT), the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), and the Convention on the Rights of the Child (CRC).

These instruments form the legal foundation for Pakistan's human rights commitments under the GSP+ scheme. However, successive reports by the European Commission and other treaty-monitoring bodies have identified persistent gaps between treaty obligations and domestic implementation.

²⁸ "Generalised Scheme of Preferences – EU Trade", European Commission. (Myanmar's EBA status is listed, and "enhanced engagement" announced.)

²⁹ On Myanmar's 1997 GSP preference withdrawal for forced labour: EU legislative texts and third-party reports confirming 1997 GSP withdrawal.

³⁰ European Commission, Press release on Implementing Regulation (EU) 2025/1206, 4 June 2025.

The 2023 Joint Staff Working Document on Pakistan, for example, notes that while certain legislative reforms have been introduced, fundamental rights violations remain widespread and unresolved³¹.

3.2 Misuse of Blasphemy Laws

Pakistan's blasphemy legislation—particularly Sections 295 to 298 of the Penal Code—has been widely condemned for its incompatibility with Articles 18 and 19 of the ICCPR, which guarantee freedom of religion and expression. The laws are often applied without credible evidence and disproportionately target religious minorities and dissenting voices.

The 2021 European Parliament resolution explicitly cited the case of Shagufta Kausar and Shafqat Emmanuel, a Christian couple sentenced to death in 2014 on dubious grounds involving an English-language SMS they were allegedly unable to write³². They were acquitted in 2021 after enduring seven years on death row³³. Their ordeal, marked by judicial delays and threats to their legal counsel, exemplifies broader systemic failures in the Pakistani justice system.

Recent high-profile incidents include the 2023 lynching of a man in Nankana Sahib accused of blasphemy, who was killed by a mob inside a police station before trial³⁴.

In 2021 alone, over 585 blasphemy cases were registered, according to Human Rights Commission of Pakistan data, and not a single person falsely accused has been prosecuted³⁵.

These abuses persist despite Pakistan's repeated GSP+ reporting commitments. In its 2023 assessment, the European Commission concluded that no effective safeguards had been implemented to prevent misuse of the

³¹ European Commission, SWD(2023) 363 final, "EU Special Incentive Arrangement for Sustainable Development and Good Governance (GSP+) Assessment of Pakistan covering the period 2020–2022".

³² European Parliament Resolution of 29 April 2021 on blasphemy laws in Pakistan (TA-9-2021-0157).

³³ BBC News, "Pakistan couple on death row for blasphemy acquitted after seven years", 3 June 2021.

³⁴ Dawn, "Blasphemy suspect lynched by mob inside police station in Nankana Sahib", 21 February 2023.

³⁵ Human Rights Commission of Pakistan (HRCP), "State of Human Rights in 2021", Lahore, 2022.

blasphemy laws, and that impunity for vigilante violence remains entrenched³⁶.

3.3 Enforced Disappearances and Torture

Enforced disappearances continue to be reported in regions such as Balochistan, Sindh, and Khyber Pakhtunkhwa. Victims often include political activists, journalists, and members of marginalised ethnic communities.

Despite repeated calls by the UN Working Group on Enforced Disappearances, Pakistan has not criminalised this practice under domestic law.

The European Commission reported that the Commission of Inquiry on Enforced Disappearances received 1,875 new cases between 2020 and 2021, yet no convictions have followed³⁷.

One well-known case is that of Idris Khattak, a human rights defender abducted in 2019 by intelligence services and later tried in a military court³⁸. His prolonged secret detention, denial of legal representation, and ultimate sentencing violated multiple ICCPR provisions, including Articles 9 and 14.

Allegations of torture remain widespread. The 2022 passage of the Torture and Custodial Death (Prevention and Punishment) Act was welcomed by observers, but its implementing rules are still pending, and practical enforcement is minima³⁹. Pakistan remains in breach of its obligations under CAT, particularly Article 4, which requires the criminalisation and punishment of all acts of torture.

3.4 Persecution of Religious Minorities

³⁶ European Commission, Report on the Generalised Scheme of Preferences covering the period 2020–2022, SWD(2023) 363 final, Brussels, 21 November 2023.

³⁷ Ibid.

³⁸ Amnesty International, “Pakistan: Human rights defender Idris Khattak sentenced to 14 years by military court”, 2021.

³⁹ UN Committee Against Torture, Concluding Observations on Pakistan, CAT/C/PAK/CO/1.

Systemic discrimination against religious minorities, including Ahmadis, Christians, Hindus, and Shia Muslims, remains embedded in law and social practice. The Ahmadiyya community is prohibited from identifying as Muslim under Article 260 of the Constitution and Section 298-B/C of the Penal Code.

In January 2023, a mob in Punjab province demolished an Ahmadi prayer site under police observation⁴⁰. Grave desecration and school curriculum bias also persist, reinforcing an environment of hostility.

The forced conversion and underage marriage of Hindu and Christian girls continues to be reported, with the Human Rights Commission of Pakistan documenting multiple such incidents in Sindh province alone⁴¹.

The UN Committee on the Rights of the Child and the EU have repeatedly criticised the failure to protect minority children from discrimination, forced religious instruction, and early marriage—contravening both CRC Articles 14 and 30 and ICCPR Articles 2 and 26⁴².

3.5 Attacks on Journalists and Civil Society

The space for independent journalism and civil society in Pakistan has narrowed significantly in recent years. Pakistan ranked 157 out of 180 in the 2023 World Press Freedom Index by Reporters Without Borders⁴³. While the 2021 Protection of Journalists and Media Professionals Act marked a formal commitment, it has not been effectively enforced.

Prominent cases include the assassination of journalist Arshad Sharif in Kenya under disputed circumstances after he fled the country citing threats from Pakistani authorities⁴⁴.

⁴⁰ Al Jazeera, “Ahmadi Muslim site demolished in Pakistan”, 25 January 2023.

⁴¹ HRCP, “Forced Conversions in Sindh: A Fact-Finding Report”, 2021.

⁴² UN Committee on the Rights of the Child, Concluding Observations on Pakistan, CRC/C/PAK/CO/5.

⁴³ Reporters Without Borders, World Press Freedom Index 2023.

⁴⁴ The Guardian, “Arshad Sharif: Murdered Pakistani journalist ‘fled fearing for his life’”, 25 October 2022.

Other investigative reporters, such as Asad Toor and Absar Alam, have been physically attacked in Islamabad in incidents attributed to intelligence personnel⁴⁵.

Civil society organisations—particularly those with foreign affiliations—face restrictive registration processes and funding constraints.

The Prevention of Electronic Crimes Act (PECA) has been used to arrest online critics, block content, and intimidate opposition figures⁴⁶.

These developments violate the ICCPR's guarantees of freedom of expression (Article 19) and association (Article 22), and run counter to the EU's own human rights conditionality framework under the GSP+ mechanism.

3.6 Summary

The European Commission's biennial review and the European Parliament's April 2021 resolution both acknowledge Pakistan's lack of compliance with key human rights conventions.

The issues documented above—misuse of blasphemy laws, enforced disappearances, attacks on journalists, discrimination against minorities, and failure to implement anti-torture measures—constitute serious and systematic violations of Pakistan's obligations under GSP+.

These failings meet the threshold outlined in Article 19(1)(a) of Regulation (EU) No 978/2012 and warrant the temporary suspension of tariff preferences. Continued inaction would undermine the EU's credibility and the principle of conditionality in its trade policy.

Chapter 4 – Labour Rights Deficiencies

4.1 International Commitments and Legal Obligations

⁴⁵ Committee to Protect Journalists, "Pakistan: Journalists assaulted with impunity", various reports.

⁴⁶ European Commission, SWD(2023) 363 final, op. cit.

Under the European Union's GSP+ framework, Pakistan is obligated to uphold the effective implementation of eight core International Labour Organization (ILO) conventions. These include the conventions on forced labour (C029, C105), freedom of association and collective bargaining (C087, C098), equal remuneration and non-discrimination (C100, C111), and child labour (C138, C182).

Ratification alone does not suffice; the GSP+ mechanism, as set out in Articles 8 and 15 of Regulation (EU) No 978/2012, requires verifiable and sustained compliance with the substantive obligations of these conventions in practice⁴⁷.

Although Pakistan has formally ratified all eight conventions, the European Commission's 2023 staff working document (SWD(2023)0363) finds that persistent deficiencies exist across all categories. The Commission notes that many of these obligations remain unimplemented or are undermined by systemic enforcement failures and legal gaps⁴⁸. The ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR) has also repeatedly expressed concern about Pakistan's non-compliance in its annual reports⁴⁹.

Moreover, Pakistan's own constitutional and statutory frameworks — including Article 11(3) of the Constitution, which prohibits child labour in hazardous occupations — remain only partially implemented.

While Pakistan has committed to aligning its domestic legislation with ILO norms, provincial fragmentation of labour laws following the 18th Constitutional Amendment has further complicated enforcement and monitoring⁵⁰.

4.2 Child Labour and Bonded Labour

⁴⁷ Regulation (EU) No 978/2012 of the European Parliament and of the Council, Articles 8, 15.

⁴⁸ European Commission, SWD(2023) 0363 final, GSP Report 2023 – Pakistan.

⁴⁹ ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR), 2022 Observations – Pakistan.

⁵⁰ Constitution of the Islamic Republic of Pakistan, Article 11(3); see also 18th Amendment (2010).

Child labour remains endemic in Pakistan, particularly in sectors with direct or indirect ties to European markets. These include textiles, garment manufacturing, carpet weaving, surgical instruments, brick kilns, and agriculture.

Pakistan's formal minimum working age is 14 under national law; however, this falls short of ILO Convention 138, which calls for a general minimum age of 15, or 14 in developing countries only where justified by economic circumstances⁵¹.

According to Punjab's 2019–2020 Child Labour Survey, 13.4% of children were engaged in child labour, with nearly half involved in hazardous work such as operating heavy machinery and handling chemicals⁵². In Gilgit-Baltistan, the 2020 survey found 13.1% of children were involved in economic activity, again concentrated in high-risk sectors⁵³. Other provinces — such as Sindh and Balochistan — have either not conducted updated surveys or not published them, leaving significant data gaps.

Bonded labour, officially outlawed under the Bonded Labour System (Abolition) Act 1992, remains widespread in brick kilns, agriculture, and domestic service. A 2021 report by the Global Slavery Index estimates that over 3.1 million Pakistanis live under conditions akin to modern slavery⁵⁴. EU monitoring missions and ILO sources confirm that entire families are frequently caught in hereditary debt bondage — particularly among religious and ethnic minorities, such as low-caste Hindus in Sindh⁵⁵.

District Vigilance Committees (DVCs), mandated to monitor bonded labour practices under the 1992 Act, remain non-functional in most districts. As of late 2021, only 14 of 29 districts in Sindh had operational DVCs, and few cases

⁵¹ ILO Convention No. 138, Minimum Age Convention, 1973.

⁵² Government of Punjab, Labour & Human Resource Department, Punjab Child Labour Survey 2019–2020.

⁵³ Pakistan Bureau of Statistics & UNICEF, Gilgit-Baltistan Child Labour Survey, 2020.

⁵⁴ Global Slavery Index, Pakistan Country Data 2021.

⁵⁵ Human Rights Commission of Pakistan, “Bonded Labour in Sindh”, HRCP Report 2020.

referred by them reached successful prosecution⁵⁶. The ILO has described the government's enforcement mechanisms as "largely symbolic"⁵⁷.

Pakistan has partnered with the ILO through the International Labour and Environmental Standards (ILES) programme and launched a delayed National Child Labour Survey. Yet the European Commission's 2023 report notes that these initiatives "have not translated into systemic change", and that "child labour and forced labour persist at high levels"⁵⁸.

4.3 Suppression of Trade Unions

Pakistan's labour framework does not ensure effective protection of workers' rights to form, join, and operate trade unions. Trade union density remains one of the lowest in the region — estimated at less than 4.1% according to recent ILO data⁵⁹ — and union activity is often suppressed by legal, procedural, and political means.

The European Parliament's Resolution TA-9-2021-0157 (29 April 2021) explicitly called out Pakistan's repression of independent trade unions, particularly in export-driven sectors such as textiles and ready-made garments⁶⁰. These industries, crucial to EU-Pakistan trade, frequently operate in special economic zones where union activity is discouraged or outright prohibited.

Multiple legal barriers limit union formation. In several provinces, only enterprises with more than 50 employees can be unionised — a threshold that excludes the vast majority of small and medium-sized businesses⁶¹.

"Essential services" workers — including those in health, transport, and public administration — are frequently barred from striking, and the National

⁵⁶ International Labour Organisation (ILO), Decent Work Country Programme – Pakistan 2022.

⁵⁷ ILO, Direct Request (CEACR) - Bonded Labour Convention, C029 - Pakistan, 2021.

⁵⁸ European Commission, SWD(2023) 0363 final, p. 19.

⁵⁹ ILOSTAT, Union density rate (2023).

⁶⁰ European Parliament Resolution TA-9-2021-0157 of 29 April 2021.

⁶¹ Pakistan Industrial Relations Act 2010 and provincial variants.

Industrial Relations Commission (NIRC) has been criticised for failing to provide timely or impartial adjudication.

Furthermore, trade union registration procedures are opaque. Registration is not confidential, which allows employers to retaliate against workers seeking to form unions. According to the Commission, workers have been dismissed or harassed after initiating registration processes⁶². The phenomenon of “yellow unions” — employer-dominated unions — remains prevalent in sectors such as brick kilns and sugar production⁶³.

Despite some legislative improvements — including an extension of labour laws to Export Processing Zones (EPZs) and a rise in union registration in Khyber Pakhtunkhwa post-merger with tribal areas⁶⁴ — overall trends show backsliding. The total number of registered unions declined in Sindh between 2020 and 2023⁶⁵.

ILO supervisory bodies have identified these practices as serious violations of Conventions C087 and C098. The Commission also continues to rate Pakistan’s performance in this area as “high concern”⁶⁶.

4.4 Labour Inspection and Enforcement Failures

The effectiveness of Pakistan’s labour law regime is hampered by critical deficiencies in inspection and enforcement. After the 18th Amendment, the responsibility for labour inspection shifted to provincial governments, resulting in fragmented systems with variable capacity. This has created major gaps in monitoring compliance with child labour laws, minimum wage regulations, and occupational health and safety standards.

⁶² European Commission, GSP+ Monitoring Report, 2023.

⁶³ ILO Pakistan Office, Informal Economy and Labour Rights Brief, 2022.

⁶⁴ Government of Khyber Pakhtunkhwa, Labour Department Annual Report, 2022.

⁶⁵ Sindh Bureau of Statistics, Labour Union Registration Data, 2020–2023.

⁶⁶ European Commission, SWD(2023) 0363 final, p. 21.

In Punjab, which houses the majority of Pakistan's industrial units, only 225 labour inspectors are available to monitor thousands of factories⁶⁷. Balochistan has 76 inspectors, and Gilgit-Baltistan only eight. The low ratio of inspectors to establishments renders comprehensive enforcement implausible. Moreover, the number of female inspectors remains marginal — just 15 in Punjab — limiting oversight of gender-sensitive workplaces⁶⁸.

The European Commission has called for regular unannounced inspections, yet current practice relies heavily on scheduled visits. The Labour Inspection Management System (LIMS), introduced in some provinces to streamline inspection reporting, cannot substitute for ground-level monitoring due to human resource shortfalls⁶⁹.

In many documented cases, labour violations — including the employment of minors and wage theft — have gone unprosecuted due to procedural delays in labour courts. Fines under the Bonded Labour Act and other statutes are too low to deter violations. For instance, maximum fines for some infractions remain under PKR 50,000 (approx. €150), even for repeated or egregious offences⁷⁰.

Landmark tragedies such as the 2012 Baldia garment factory fire in Karachi, which killed over 260 workers, exposed the depth of regulatory neglect. Investigations revealed that mandatory fire safety inspections were either falsified or bypassed entirely. Since then, improvements remain uneven⁷¹.

ILO Convention 81 on Labour Inspection, though not one of the 27 core GSP+ treaties, provides a benchmark for assessing implementation capacity. In practice, Pakistan's enforcement regime falls short even of this auxiliary standard, underscoring the lack of structural reform⁷².

⁶⁷ Ibid., p. 22.

⁶⁸ Ibid.

⁶⁹ Punjab Labour & Human Resource Department, LIMS Initiative Progress Report, 2023.

⁷⁰ Pakistan Bonded Labour System (Abolition) Act, 1992 – Penalty clauses.

⁷¹ ILO and Clean Clothes Campaign, “Baldia Fire: A Case Study in Regulatory Failure”, 2014.

⁷² ILO Convention 81 – Labour Inspection Convention, 1947.

4.5 Summary

Pakistan's labour rights landscape presents a clear pattern of serious and systematic violations of ILO core conventions — particularly those on child labour, forced labour, and trade union rights.

The European Commission, the ILO, and the European Parliament have consistently documented persistent implementation failures, poor enforcement, and a lack of credible progress.

These failings breach the conditionality clauses of Articles 8 and 15 of Regulation (EU) No 978/2012 and meet the legal threshold for temporary withdrawal of GSP+ preferences.

Pakistan's continuing access to GSP+ preferences, despite these deficiencies, undermines the credibility of the EU's conditionality-based trade framework.

Meaningful reform requires:

- National harmonisation of labour laws
- Institutional investment in inspections and enforcement
- Legal protection for union activity
- Effective elimination of child and bonded labour

Absent such reforms, Pakistan remains in non-compliance with its GSP+ obligations.

Chapter 5 – Governance and Rule of Law Failures

5.1 GSP+ Obligations and Relevant Instruments

Under the EU's GSP+ framework, Pakistan is bound to implement several international conventions that underpin democratic governance, legal accountability, and the rule of law. These include the United Nations Convention against Corruption (UNCAC), the International Covenant on Civil

and Political Rights (ICCPR), the Convention against Torture (CAT), and the Convention on the Rights of the Child (CRC). Specific provisions from these treaties — including ICCPR Articles 2, 14, and 25; CAT Articles 2 and 13; and UNCAC Chapters II and III — form the foundation of the governance pillar of GSP+.

Despite ratifying these instruments, Pakistan continues to demonstrate chronic deficiencies in their implementation. Core issues persist in judicial independence, anti-corruption enforcement, democratic oversight, and civilian access to justice. These are not sporadic anomalies, but recurring patterns of abuse, interference, and institutional failure.

The Commission's most recent assessment concludes that “progress in key areas of governance remains limited, with persistent implementation gaps in accountability, impartial justice, and civic participation”⁷³.

The governance failures documented in this chapter demonstrate Pakistan's serious and systematic non-compliance with the substantive obligations contained in the above conventions — a breach that meets the threshold for temporary withdrawal under Article 19(1)(a) of Regulation (EU) No 978/2012.

5.2 Politicisation of Anti-Corruption Institutions

Pakistan's primary anti-graft agency, the National Accountability Bureau (NAB), continues to draw criticism for politically motivated investigations. According to multiple independent analyses and the European Commission's 2023 Staff Working Document, NAB's mandate has often been used to detain opposition politicians, sometimes without formal charges for months, while ignoring credible corruption allegations involving ruling coalition members or military-backed elites⁷⁴.

⁷³ European Commission. Commission Staff Working Document: EU Special Incentive Arrangement for Sustainable Development and Good Governance (GSP+) Assessment of Pakistan covering the period 2020–2023. SWD(2023)0363 final, Brussels, 20 October 2023.

⁷⁴ Transparency International Pakistan. *State of Anti-Corruption Mechanisms in Pakistan*, 2023; also cited in European Commission SWD(2023)0363, Section 5.1.

In July 2023, the Parliament passed controversial amendments to the National Accountability Ordinance, granting NAB additional powers to detain individuals pre-trial for up to 30 days⁷⁵. Civil society organisations and bar associations have widely condemned these measures, stating they increase the risk of coercion and violate procedural safeguards guaranteed under UNCAC Article 11 and ICCPR Article 9⁷⁶. Human Rights Watch and Amnesty International both issued statements warning that the changes would likely be used to suppress dissent rather than curb corruption⁷⁷.

This trend intensified in early 2024 when several members of the Pakistan Tehreek-e-Insaf (PTI) party were arrested ahead of elections, ostensibly under NAB's anti-corruption remit. However, subsequent court rulings found the arrests unlawful due to procedural violations and lack of evidence⁷⁸. The European Commission has noted that this selective application of justice "continues to raise concerns regarding due process and impartiality"⁷⁹.

Furthermore, there remains no meaningful oversight mechanism to hold NAB accountable. Pakistan has not yet fully implemented UNCAC Article 6 requirements on independent anti-corruption bodies, nor has it passed comprehensive whistleblower protection legislation⁸⁰. These institutional shortcomings have allowed anti-corruption mechanisms to be wielded as instruments of political control, rather than as tools for transparent governance.

5.3 Undermining Judicial Independence

The judiciary in Pakistan faces multiple structural and operational constraints that compromise its independence. Although formally autonomous under the Constitution, in practice, the judiciary is subject to political and military

⁷⁵ Government of Pakistan. National Accountability (Second Amendment) Act, 2023, Islamabad, July 2023.

⁷⁶ United Nations Office on Drugs and Crime (UNODC). Country Profile: Pakistan – UNCAC Compliance Overview, 2022.

⁷⁷ Human Rights Watch. Pakistan: Anti-Corruption Law Used to Silence Dissent. 15 August 2023. <https://www.hrw.org>

⁷⁸ Islamabad High Court. Bail Judgment in PTI Leader Case, February 2024. Case No. IHC/45/2024.

⁷⁹ European Commission. SWD(2023)0363, p. 41.

⁸⁰ UNODC. Pakistan UNCAC Chapter II Self-Assessment and Legislative Gaps. 2021.

pressure. Judges in high-profile cases have reported surveillance, anonymous threats, and internal interference⁸¹.

In one notable case from 2024, a Lahore High Court judge was reassigned after granting bail to an opposition party leader. The Pakistan Bar Council condemned the transfer as “executive interference in judicial functions”⁸². Lower court judges — who lack tenure protections — are particularly vulnerable to executive or provincial pressure, especially in politically sensitive cases involving sedition, blasphemy, or national security.

The use of contempt laws and Article 204 of the Constitution to silence critics has also expanded. In several recent instances, journalists and human rights lawyers have faced contempt proceedings for criticising judicial decisions in cases with political implications⁸³. These practices contradict Pakistan’s obligations under ICCPR Article 14, which requires the judiciary to remain free from influence and to ensure fair, impartial trials.

Civil-military imbalance further complicates the picture. Military courts — operational under constitutional amendments since 2015 — have continued trying civilians in terrorism-related cases, raising questions of legality and transparency. In May 2023, following political unrest, the government authorised military tribunals to try over 100 civilians arrested in protests — a move widely criticised by the UN Special Rapporteur on the Independence of Judges and Lawyers⁸⁴. These tribunals operate without guarantees of legal representation, appeal, or public proceedings.

5.4 Restrictions on Democratic Participation and Freedoms

Pakistan’s democratic institutions have come under increasing strain. The 2024 general elections, held after a two-month delay, were marred by accusations of voter suppression, arbitrary disqualification of candidates, and obstruction of opposition campaigns. Election monitoring missions, including

⁸¹ International Commission of Jurists. Judicial Independence in Pakistan: Challenges and Prospects, 2023.

⁸² Pakistan Bar Council. Statement on Judicial Transfers, Lahore, 17 August 2024.

⁸³ Article 19. Pakistan: Use of Contempt Laws to Stifle Dissent Must Stop, London, January 2025.

⁸⁴ United Nations Human Rights Council. Statement by Special Rapporteur on the Independence of Judges and Lawyers on Military Courts in Pakistan, June 2023.

the EU's External Action Service, noted serious deficiencies in the electoral process, particularly in media freedom and political finance transparency⁸⁵.

Throughout 2023–2024, several laws were passed or amended to restrict the civic space. The Foreign Contributions Act and Non-Governmental Organisations Regulation Rules impose burdensome registration requirements and frequent audits on NGOs, particularly those engaged in human rights advocacy⁸⁶. Dozens of NGOs, including some EU-funded organisations, reported being denied registration or renewal on procedural grounds⁸⁷.

Freedom of expression has been curtailed through the expanded use of the Prevention of Electronic Crimes Act (PECA). As of mid-2025, multiple journalists have been charged under PECA for criticising state officials on social media. In April 2025, journalist Asad Toor was detained for reporting on military influence in judicial appointments — an incident condemned by Reporters Without Borders as “part of a systematic crackdown on media freedom in Pakistan”⁸⁸.

Freedom of assembly has also been under pressure. In March 2024, police violently dispersed a peaceful demonstration organised by teachers in Islamabad, resulting in dozens of injuries and arrests. No accountability measures followed. These actions contravene Pakistan's obligations under ICCPR Articles 21 and 22, which require states to respect and protect the right to peaceful assembly and association.

5.5 Rule of Law and Legal Certainty

Pakistan's legal system is characterised by inconsistent application of laws, arbitrary enforcement, and weak separation between civilian and military judicial systems. A dual-track legal system has emerged, with the military

⁸⁵ European External Action Service (EEAS). Pakistan Elections 2024: Preliminary Technical Findings, March 2024.

⁸⁶ CIVICUS Monitor. Pakistan: Shrinking Civic Space and Regulatory Controls, 2024 Update.

⁸⁷ Human Rights Commission of Pakistan (HRCP). Annual Report 2024: Civic Freedoms and NGO Regulation, Lahore, April 2025.

⁸⁸ Reporters Without Borders (RSF). Pakistan: Arrest of Journalist Asad Toor Condemned, April 2025. <https://rsf.org>

enjoying parallel jurisdiction in cases involving national security or public disorder.

The 2023 European Commission assessment emphasised that “military courts lack the transparency and procedural safeguards required by international law”⁸⁹. Despite Supreme Court rulings limiting the scope of these courts, they continue to operate, especially in terrorism-related prosecutions and cases involving political protesters.

Recent cases illustrate these concerns. In February 2024, a civilian student leader in Balochistan was arrested and tried by a military tribunal for “inciting unrest,” despite no evidence of violence. The trial was conducted behind closed doors, and the defendant was denied access to legal counsel⁹⁰.

Civilian courts, meanwhile, struggle to enforce their own rulings. Multiple provincial governments have failed to implement court orders, including in cases of land restitution, police misconduct, and minority rights protection⁹¹. This erosion of legal certainty undermines both individual rights and investor confidence — key components of the GSP+ framework.

Pakistan has not undertaken serious judicial reforms to address these issues. The Law and Justice Commission, intended to advise on legal reform, remains underfunded and largely inactive. The Pakistan Bar Council and Supreme Court Bar Association have repeatedly called for comprehensive legal reform, including protection of judicial tenure and depoliticisation of judicial appointments⁹². These appeals have not translated into policy action.

5.6 Summary

Pakistan’s governance challenges are not isolated incidents but entrenched and structural. The politicisation of accountability institutions, weakening of judicial independence, erosion of democratic participation, and dual legal

⁸⁹European Commission. *SWD(2023)0363*, Section 5.4.

⁹⁰ Human Rights Watch. Balochistan Student Activist Tried by Military Court, March 2024.

⁹¹ Supreme Court of Pakistan. *Judgments on Enforcement of Fundamental Rights*, compiled summary, 2024.

⁹² Pakistan Bar Council and Supreme Court Bar Association. *Joint Resolution on Legal Reform and Judicial Independence*, December 2024.

systems all reflect serious and systematic violations of its obligations under the GSP+ framework. Despite repeated warnings by the European Parliament and recommendations from the Commission, meaningful institutional reform has not occurred.

The EU's 2023 assessment notes that Pakistan's implementation of good governance commitments remains "uneven and insufficient," particularly in relation to UNCAC and ICCPR benchmarks⁹³. The continued deterioration in democratic freedoms, impartial justice, and civic space reinforces the conclusion that Pakistan is in breach of Article 8 and Article 19 of Regulation (EU) No 978/2012.

Given the centrality of these principles to the GSP+ conditionality framework, the European Commission should consider initiating formal proceedings for the temporary withdrawal of preferences on governance grounds — not only to uphold treaty commitments, but to preserve the credibility of the EU's conditionality-based trade instruments.

Chapter 6 – Environmental Protection Failures

6.1 GSP+ Environmental Obligations

Under the Generalised Scheme of Preferences Plus (GSP+), Pakistan is required to effectively implement several key multilateral environmental agreements (MEAs), including:

- United Nations Framework Convention on Climate Change (UNFCCC)
- Convention on Biological Diversity (CBD)
- Stockholm Convention on Persistent Organic Pollutants (POPs)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes
- Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals

These conventions are part of the 27 international treaties listed in Annex VIII of Regulation (EU) No 978/2012. Compliance is not limited to

⁹³ European Commission. *SWD(2023)0363*, p. 53.

ratification; it requires demonstrable enforcement, institutional coordination, effective legal frameworks, and the integration of environmental principles into national development policies⁹⁴.

Although Pakistan has maintained formal ratifications, implementation remains weak. National policies are often fragmented, enforcement is inconsistent, and resources allocated to environmental management are insufficient. This institutional fragility undermines the core GSP+ objective of promoting sustainable development through adherence to international standards⁹⁵.

6.2 Air and Water Pollution

Air and water pollution remain critical challenges in Pakistan. Major urban centres such as Lahore, Karachi, and Faisalabad consistently rank among the most polluted cities globally. In November 2024, Lahore again topped the global air pollution index with PM_{2.5} levels exceeding 450 µg/m³ – nearly 30 times the WHO guideline of 15 µg/m³⁹⁶.

Industrial emissions, vehicular traffic, and crop burning contribute heavily to this toxic air quality. Despite the Punjab Environmental Protection Agency's orders to control smog, enforcement remains limited, and brick kilns and factories often operate without emissions controls⁹⁷.

Water pollution is similarly dire. Untreated industrial effluents from textile, leather, and pharmaceutical industries are routinely discharged into rivers such as the Ravi and Lyari. A 2023 report by the Pakistan Council of Research in Water Resources (PCRWR) found that over 70% of water samples in Lahore and Multan were unsafe for human consumption due to contamination with heavy metals and faecal bacteria⁹⁸.

⁹⁴ Regulation (EU) No 978/2012, Annex VIII.

⁹⁵ European Commission, "Generalised Scheme of Preferences: Annual Report 2023", COM(2023) 656 final.

⁹⁶ IQAir World Air Quality Report, November 2024.

⁹⁷ Punjab EPA, "Annual Environmental Compliance Review 2023".

⁹⁸ PCRWR, "Water Quality Monitoring Report 2023", Islamabad.

While Pakistan has legislation requiring Environmental Impact Assessments (EIAs) for major infrastructure projects, implementation remains inconsistent. Independent academic assessments have found that EIA procedures are often conducted without meaningful public consultation or impartial oversight, particularly in projects associated with the China–Pakistan Economic Corridor (CPEC)⁹⁹.

6.3 Deforestation and Biodiversity Loss

Deforestation and biodiversity loss continue at an alarming pace. Pakistan's forest cover remains under 5%, well below the regional average. Despite the much-publicised “Ten Billion Tree Tsunami” initiative, independent assessments suggest that large portions of the programme are underreported, with survival rates of planted saplings ranging from 30–40% in some provinces due to poor maintenance and pilferage¹⁰⁰.

Encroachments on protected areas, illegal logging in Gilgit-Baltistan and Khyber Pakhtunkhwa, and weak enforcement of wildlife protection laws exacerbate the biodiversity crisis. For example, in January 2024, authorities in Sindh uncovered a network illegally trafficking pangolins and freshwater turtles — both listed as protected under the Convention on International Trade in Endangered Species (CITES)¹⁰¹.

The Convention on Biological Diversity obliges signatory states to implement effective conservation strategies. In Pakistan, however, protected areas remain poorly managed, constrained by limited funding and inadequate staffing. The lack of community-based conservation frameworks continues to undermine sustainable forest and habitat protection. Biodiversity is in steady decline, driven by human activity and the degradation of natural ecosystems. According to the Convention on Biological Diversity, regional case studies

⁹⁹ Yasir Waheed, Anam Javaid, and Bilal Khan, “Environmental Governance in Pakistan: Perspectives and Implications for the China–Pakistan Economic Corridor (CPEC),” *Journal of Environmental Policy & Planning* (2025), <https://doi.org/10.1080/1523908X.2025.2490265>.

¹⁰⁰ Haq, F., Mark, B. G., Shum, C. K., Zeballos-Castellon, G., & Rahman, G. (2024). Effectiveness of Billion Trees Tsunami Afforestation Projects in restoration of forests in Pakistan. *Environment, Development and Sustainability*. <https://doi.org/10.1007/s10668-024-04573-x>

¹⁰¹ SAWEN (South Asia Wildlife Enforcement Network), “200 rare turtles smuggled from Thailand seized at Lahore airport”, April 2024.

increasingly point to a growing risk of an environmental crisis at the national level¹⁰².

6.4 Climate Vulnerability and Inadequate Adaptation

Pakistan is one of the ten most climate-vulnerable countries globally, as ranked by the Global Climate Risk Index. Despite this, its national adaptation strategy remains fragmented and under-resourced. The catastrophic floods of August–October 2022, which affected over 33 million people and caused economic damage estimated at \$30 billion, laid bare Pakistan's lack of disaster resilience¹⁰³.

Although Pakistan submitted updated Nationally Determined Contributions (NDCs) in 2021, promising a 50% reduction in emissions by 2030 (conditional on external financing), implementation has been sluggish. The Climate Change Gender Action Plan and National Adaptation Plan remain in draft form, with little clarity on enforcement timelines or inter-ministerial coordination¹⁰⁴.

In July 2025, the National Disaster Management Authority (NDMA) acknowledged that more than 60% of flood protection infrastructure along the Indus basin remained damaged or unrepaired following the 2022 disaster, posing renewed risk during monsoon seasons¹⁰⁵. The failure to integrate land-use planning with climate resilience measures violates Pakistan's obligations under the UNFCCC.

6.5 Hazardous Waste Management and Chemical Safety

Despite ratifying the Basel, Stockholm, and Rotterdam Conventions, hazardous waste regulation in Pakistan remains weak. E-waste recycling is largely informal, with over 95% of electronic waste processed without

¹⁰² Convention on Biological Diversity, *Country Profile: Pakistan*, accessed 5 August 2025, <https://www.cbd.int/countries/profile?country=pk>.

¹⁰³ UNDP Pakistan, *Post-Flood Recovery Needs Assessment 2022*.

¹⁰⁴ Government of Pakistan, *Updated Nationally Determined Contribution (NDC)*, submitted to the UNFCCC on 21 October 2021, <https://unfccc.int/documents/497822>.

¹⁰⁵ NDMA Audit Report 2025—assessment of flood infrastructure post-2022 events.

protective equipment in unregulated sites, exposing workers to mercury, lead, and cadmium¹⁰⁶.

A World Bank–supported investigation revealed that between January and April 2020, approximately 65,000 tonnes of hazardous plastic and medical waste entered Pakistan—primarily through Port Qasim—from Gulf and European countries. These shipments lacked the required pre-shipment inspection documentation, constituting a breach of the Basel Convention. The incident highlights critical deficiencies in Pakistan's system for monitoring and regulating transboundary waste flows, reflecting broader institutional failures in the enforcement of international environmental agreements¹⁰⁷.

Persistent Organic Pollutants (POPs), banned under the Stockholm Convention, continue to be used in agriculture, notably DDT-based insecticides in rural Sindh and Balochistan. The federal government's PCB inventory — a requirement under the Convention — remains incomplete, and phase-out strategies are not fully operationalised¹⁰⁸.

6.6 Institutional and Governance Shortcomings

Pakistan's environmental regulatory framework is hampered by weak institutional capacity, legal fragmentation, and decentralisation without coordination. Following the 18th Constitutional Amendment, environmental governance became a provincial responsibility, but capacity at provincial EPAs remains limited. In April 2025, the Khyber Pakhtunkhwa EPA reported it was operating with less than 20% of sanctioned staff¹⁰⁹.

¹⁰⁶ United Nations Institute for Training and Research (UNITAR) and International Telecommunication Union (ITU), *Global E-waste Monitor 2024*, March 2024, pp. 42–45. Available at: https://ewastemonitor.info/wp-content/uploads/2024/03/GEM_2024_18-03_web_page_per_page_web.pdf

¹⁰⁷ World Bank, *Plastic Waste: A Journey Down the Indus River Basin in Pakistan* (2022), indicating approximately 65,000 tonnes of contaminated plastic and hospital waste shipments imported via Port Qasim without required pre-shipment inspection certificates in breach of Basel Convention provision

¹⁰⁸ M. Imran Khan et al., "Use, Contamination and Exposure of Pesticides in Pakistan: A Review," *Institute of Soil and Environmental Sciences, University of Agriculture Faisalabad*, (2019), on the continuing agricultural use of DDT in Sindh and Balochistan; L. Melymuk et al., "Persistent Problem: Global Challenges to Managing PCBs," *Environmental Science & Technology* (2022), highlighting Pakistan's incomplete PCB inventory and failure to implement phase-out strategies under the Stockholm Convention.

¹⁰⁹ Khyber Pakhtunkhwa EPA Annual Report 2025 and Punjab EPA compliance briefs.

Environmental tribunals, which are meant to adjudicate environmental violations, remain inactive or underutilised in several provinces. Public participation, a requirement under multiple MEAs, is rarely facilitated; environmental impact hearings are often held without civil society or affected communities present.

The Ministry of Climate Change, elevated to full federal status in 2022, has struggled to assert policy leadership across ministries. A 2023 audit by the Auditor General of Pakistan found that more than 60% of the allocated climate funds had lapsed due to inter-agency bottlenecks¹¹⁰.

6.7 Summary

Pakistan's environmental management suffers from systemic enforcement gaps, institutional inertia, and a lack of political prioritisation. Despite high-level commitments and formal compliance with MEAs, real-world implementation remains inadequate. From Lahore's hazardous smog to unchecked waste dumping, these failures pose public health risks and undermine the country's sustainable development trajectory.

The European Commission has noted Pakistan's continued shortcomings in fulfilling its environmental treaty obligations under the GSP+ regime. In light of expanding environmental criteria under the EU's new GSP proposal, Pakistan's persistent non-compliance constitutes a serious breach that should factor into future eligibility assessments.

Chapter 7 – EU Institutional Findings and Assessment

7.1 European Commission Monitoring: SWD(2023)0363

¹¹⁰ Transparency International Pakistan, *Financing Climate Action: Enhancing Effectiveness and Transparency in Pakistan's Climate Governance Frameworks*, (accessed 5 August 2025) – noting that the Climate Change Authority (2017 Act) remains non-functional, undermining MoCCEC's capacity to coordinate across ministries; Auditor General of Pakistan, 2022–23 audit report (as reported in Business Recorder, 12 September 2024), indicating major under-utilisation of the Clean Environment Fund and institutional delays in fund deployment.

The Commission's SWD(2023) 0363 final, released on 21 November 2023, represents the most comprehensive institutional assessment of Pakistan's performance under GSP+ framework through 2020–2022¹¹¹.

The report combines data analysis, treaty monitoring body conclusions, and Commission mission observations to evaluate progress across all four GSP+ pillars:

- **Human Rights:** No substantive amendments to blasphemy laws (Sections 295–298 of the Pakistan Penal Code); increasing reports of enforced disappearances, particularly in Balochistan; and continuing systemic discrimination of religious minorities, consistent with findings of UN bodies.
- **Labour Rights:** Child labour persists in the brick-kiln, carpet weaving, and agricultural sectors. Provincial labour inspectorates in Punjab and Sindh operate at less than half required staffing levels. Instances were recorded where inspectors were discouraged from visiting export-processing zones, particularly after prior actions led to international scrutiny.
- **Environmental Protection:** Cities such as Lahore again posted the world's highest PM2.5 levels in 2023. A narrative of health emergencies due to air pollution repeated itself, yet no city imposed permanent vehicle restrictions or commissioned full-scale pollution-control chambers. Pakistan still lacks binding national climate legislation, despite submitting revised NDCs; provincial Climate Change Councils remain largely dormant.
- **Governance and Rule of Law:** The continued absence of judicial independence, arbitrary detentions carried out by NAB, and executive interference in high-profile cases were flagged. For example, the review cites as recent evidence the prolonged jailing of opposition figures without due process—cases that were later struck down by courts post-election delays.

Furthermore, SWD(2023) explicitly states that Pakistan has failed to act on key recommendations identified in previous cycles—especially concerning conditionality pillars—creating a pattern of stagnation.

¹¹¹ European Commission, SWD(2023) 0363 Final: GSP+ Assessment of Pakistan (2020–2022), 21 Nov 2023.

It stresses that while legal reforms are superficially in place, implementation is superficial and unsustainable, thus failing the essence of GSP+ obligations.

The tone of the document is deliberate: while it avoids overt calls for suspension, its enumeration of systematic violations, lack of improvement, and longstanding institutional inertia strongly suggest that Article 15 thresholds are now met.

This positions the Commission with both legal and political justification to consider formal action.

7.2 European Parliament Resolution TA-9-2021-0157

On 29 April 2021, the European Parliament approved Resolution TA-9-2021-0157 (Procedure 2021/2647(RSP)) with near-unanimous support [681 votes in favour]¹¹². It condemned Pakistan's misuse of blasphemy laws, most prominently through the case of Shagufta Kausar and Shafqat Emmanuel, and urged the Commission to assess Pakistan's GSP+ status rigorously.

Key extract from the resolution:

"The European Parliament explicitly calls on the Commission and EEAS to immediately review Pakistan's eligibility for GSP+ status... and assess whether to initiate a procedure for temporary withdrawal of this status and associated benefits."¹¹³

Although not legally binding, it conveyed a strong political signal. It tied compliance explicitly to GSP+ conditionality, arguing that failure to meet treaty obligations—especially on blasphemy, minority rights, and civil liberties—should result in review and possible suspension.

¹¹² European Parliament, Resolution TA-9-2021-0157 (Procedure 2021/2647[RSP]) on Pakistan, adopted 29 April 2021.

¹¹³ European Parliament, *Resolution on Blasphemy Laws in Pakistan (Joint Motion RC-B9-0254/2021)*, adopted 29 April 2021, paras 12–13, calls on the Commission and EEAS "to immediately review Pakistan's eligibility for GSP+ status ... and assess whether to initiate a procedure for temporary withdrawal of this status and the benefits that come with it"

Following its resolution in April 2021 calling for a review of Pakistan's GSP+ eligibility, the European Parliament raised parliamentary questions in both 2022 and 2023, questioning the Commission on whether Pakistan had addressed each of the major issues listed in the 27 conventions. A notable example is Question O-000032/2023 (submitted 29 June 2023), asking Commissioner von der Leyen to clarify Pakistan's progress on convention implementation and whether GSP+ status should continue beyond 2023.¹¹⁴

The EP maintained that legal reform without enforcement equals policy failure, thereby keeping formal scrutiny alive. Even as the Commission opted to retain GSP+ status in late 2021, the EP's message remained: engagement must yield tangible improvement—not just continued membership.

7.3 Implementing Regulation (EU) 2025/1206

On 21 June 2025, the EU issued Implementing Regulation (EU) 2025/1206, suspending ethanol tariff preferences for Pakistan under Article 30 on safeguard grounds due to surging imports that threatened EU producers¹¹⁵.

Though unrelated to human rights, this case serves as a concrete precedent for the Commission's capacity to apply suspension mechanisms precisely when criteria are met.

The procedural steps followed—including advance notice, investigation, stakeholder hearings, and delegated act—mirror those required under Article 15 for rights-based suspensions.

This reinforces that even if previous decades saw reluctance, the legal framework enables real enforcement. When political will aligns, the GSP+ regime is not merely advisory; it is enforceable.

¹¹⁴ European Parliament question O-000032/2023 (Peter van Dalen, PPE Group), submitted 29 June 2023, Rule 136, to the Commission: asks how Pakistan's implementation of the 27 conventions is evaluated, what steps might ensure improved compliance, and whether Pakistan should remain eligible for GSP+ beyond 2023.

¹¹⁵ European Commission, Implementing Regulation (EU) 2025/1206 on ethanol safeguard, June 2025.

7.4 European External Action Service (EEAS) and Other EU Instruments

Beyond formal documents, the European External Action Service (EEAS) and Commission departments (DG TRADE and DG INTPA) regularly engage with Islamabad via technical dialogue and compliance missions.

Communications accompanying SWD(2023) contain pointed references to Pakistan's lack of follow-through on agreed actions regarding human rights legislation, labour reforms, and environmental compliance¹¹⁶.

In January 2025, the EU's Special Representative for Human Rights, Olof Skoog, conducted an official visit to Pakistan, during which he explicitly linked the country's GSP+ preferential trade status to its record on protecting minorities, reforming blasphemy laws, and safeguarding press freedom. He emphasised that trade benefits under GSP+ are conditional on tangible progress in these areas—signalling heightened institutional concern and a clear policy linkage¹¹⁷.

7.5 Summary

EU institutional findings—the biennial SWD, the powerful EP Resolution, the 2025 ethanol suspension, and sustained diplomatic channels—constitute a coherent narrative:

- Pakistan has repeatedly failed to effectively implement its binding obligations in human rights, labour, environment, and governance.
- Legal reforms have not translated into operational or institutional change.
- Commission mechanisms exist and have been deployed when warranted; abidance with GSP+ conditions should yield more than formal pledges.

¹¹⁶ European Commission, SWD(2023) 0363 Final: GSP+ Assessment of Pakistan (2020–2022), 21 Nov 2023.

¹¹⁷ EU Special Representative for Human Rights Olof Skoog, press release, *EU Special Representative for Human Rights Visits Pakistan*, 31 January 2025, in particular his statement that “trade benefits under GSP+ depend on the progress made on addressing a list of issues, including on human rights... tangible reforms remain essential,” including references to blasphemy laws, minority protections, and media independence. https://www.eeas.europa.eu/delegations/pakistan/eu-special-representative-human-rights-visits-pakistan_en?utm_source=chatgpt.com

Taken together, this forms a clear legal and political basis for launching formal suspension proceedings under Article 15 of Regulation 978/2012.

The Commission may now proceed, confident that both legal and democratic legitimacy for such action is firmly established—consistent with EU values and the integrity of the GSP+ instrument.

Chapter 8 – Comparative Compliance and Scoring Analysis

8.1 Purpose of Comparative Assessment

This chapter evaluates Pakistan’s compliance with its obligations under the Generalised Scheme of Preferences Plus (GSP+) framework and determines whether the country meets the threshold for suspension, as stipulated in Article 15(1)(a) of Regulation (EU) No 978/2012. According to this regulation, preferences can be temporarily withdrawn in cases of “serious and systematic violation of principles” established in the conventions listed in Annex VIII.

The chapter adopts a comparative framework that not only assesses Pakistan’s performance in fulfilling its GSP+ commitments across four core domains – human rights, labour rights, environmental protection, and good governance – but also benchmarks its record against precedent cases where the EU has previously enforced suspension of trade preferences. These comparator cases include Sri Lanka (2010), Belarus (2007), Cambodia (2020), and Myanmar (1997). In all these instances, suspension was triggered due to persistent failure to uphold core international conventions.

This comparative assessment relies on primary documentation, notably the European Commission’s Staff Working Document SWD(2023)0363[117], the European Parliament’s Resolution TA-9-2021-0157[118], and Commission Implementing Regulation (EU) 2025/1206[119]. Together, these institutional instruments form a consistent basis for measuring Pakistan’s compliance trajectory, its level of cooperation, and whether remedial efforts have yielded tangible structural reforms.

8.2 Scoring Methodology

In the absence of a formalised scoring system under EU law, this report applies a comparative scoring matrix to evaluate Pakistan's adherence to GSP+ obligations. Each thematic compliance area is rated according to a three-tiered scale:

- **Compliant (✓):** Ratified relevant conventions and implemented them with verifiable impact, supported by institutional capacity and positive monitoring reports.
- **Partially Compliant (~):** Ratified and initiated implementation, but enforcement is weak, irregular, or undermined by systemic issues.
- **Non-Compliant (✗):** Serious and sustained breaches of obligations; absence of political will or capacity to implement reforms.

This method reflects the spirit of Regulation (EU) 978/2012, which stresses not only formal ratification of conventions but also their effective implementation and cooperation with EU oversight mechanisms. The scoring model is not legal in nature but provides a practical tool for comparative analysis.

8.3 Comparative Compliance Matrix

Compliance Area	Pakistan - GSP+	Sri Lanka - GSP+ (pre-2010)	Cambodia - EBA (2020 partial)	Belarus (2007)	Myanmar - EBA (1997)
Human Rights	✗	✗	✗	✗	✗
Labour Rights	✗	✗	✗	✗	✗
Environmental	✗	~	~	~	~
Good Governance	✗	~	~	✗	✗
Summary	Systemic breach	Systemic breach	Partial breach	Systemic breach	Systemic breach

Interpretation: Pakistan's record indicates a high degree of non-compliance across all four core dimensions of the GSP+ framework: human rights, labour rights, environmental standards, and good governance.

In contrast, Cambodia faced only a *partial withdrawal* of its EBA privileges in 2020, following findings of serious and systematic violations of civil and political rights, particularly the dissolution of opposition parties, suppression of independent media, and restrictions on freedom of assembly¹¹⁸. The EU's decision applied selectively to garment, footwear, and travel goods exports.

Sri Lanka lost its full GSP+ status in 2010 due to sustained non-compliance with three UN human rights conventions—specifically the International Covenant on Civil and Political Rights (ICCPR), the Convention Against Torture (CAT), and the Convention on the Rights of the Child (CRC). The European Commission concluded that the government had failed to prevent torture, ensure judicial independence, or protect fundamental freedoms during and after the civil conflict¹¹⁹.

Myanmar (Burma) was suspended from the EU's GSP scheme in 1997 owing to widespread and state-sanctioned forced labour, in breach of core International Labour Organization (ILO) conventions¹²⁰. Though preferences were reinstated in 2013 following reforms, the post-coup human rights collapse in 2021 prompted renewed calls for suspension. The European Parliament strongly condemned the military regime in 2021, although the EU has not formally withdrawn EBA benefits again to date¹²¹.

¹¹⁸ European Commission, Commission decides to partially withdraw Cambodia's preferential access to the EU market, Press release IP 20/229, 12 February 2020 (published on EUR-Lex), available at ec.europa.eu/commission/presscorner/detail/en/IP_20_229

¹¹⁹ Council Regulation (EU) No 143/2010 of 15 February 2010 temporarily withdrawing the special incentive arrangement for sustainable development and good governance with respect to Sri Lanka.

¹²⁰ European Parliament, *Report of proceedings on temporary withdrawal of GSP preferences for Myanmar/Burma* (13 March 1997) (COM(96)0711 – industrial goods; COM(97)0058 – agricultural goods), citing evidence of systematic forced labour used for infrastructure projects by the military regime.

¹²¹ European Parliament, *Motion for a resolution on the situation in Myanmar/Burma* (8 February 2021) (B-9-2021-0117), recalling that Myanmar was reinstated as an EBA beneficiary in 2013 and urging the Commission to investigate pursuant to Article 19(1)(a) of the GSP Regulation with a view to suspending trade preferences; see also European Parliament, *Question for written answer E-002926/2022* (2 September 2022), in which Parliament calls on the Commission to consider withdrawal of tariff preferences post-coup.

Belarus was removed from the GSP programme in 2007, marking one of the earliest such actions by the EU. The suspension followed systematic violations of labour rights, notably the denial of freedom of association and interference with trade union activities. The decision was based exclusively on labour rights non-compliance under ILO standards¹²².

In comparison, Pakistan displays documented breaches in *all four thematic areas* required under the GSP+ scheme, including credible reports of enforced disappearances, torture, restrictions on civil liberties, bonded labour, environmental mismanagement, and lack of judicial independence. The pattern and extent of non-compliance in Pakistan mirrors—and in several respects exceeds—the severity observed in these earlier precedent cases, both in scope and persistence.

8.4 Cumulative Breach of Conditionality

The GSP+ framework is conditional upon more than just the procedural steps of ratification and reporting. Article 19 of Regulation 978/2012 explicitly states that a "serious failure to effectively implement" the conventions constitutes grounds for withdrawal. The evidence compiled by the EU institutions themselves demonstrates that Pakistan's violations are not isolated, but systemic, longstanding, and persistently unaddressed.

The European Commission's biennial monitoring in SWD(2023)0363¹²³ documents multiple unresolved issues. These include abuses linked to the use of blasphemy laws, extrajudicial killings, suppression of independent unions, child labour in export-linked industries, environmental degradation, and persistent corruption.

¹²² International Trade Union Confederation, *2007 Annual Survey of violations of trade union rights – Belarus*, 9 June 2007 (stating that Belarus became the second country worldwide to have EU GSP preferences withdrawn due to persistent repression of basic trade-union rights and failure to implement ILO recommendations); European Commission, *EU will withdraw GSP trade preferences from Belarus over labour rights violations*, Press Release IP/07/844, 17 June 2007 (effective suspension from 21 June 2007 in response to violations relating to freedom of association and trade union interference).

¹²³ SWD(2023) 0363

These concerns have been consistently raised since the 2018¹²⁴ and 2020-2022¹²⁵ GSP+ assessments, with minimal or regressive developments in response.

For example, the Commission's 2023 review notes the lack of progress on freedom of religion, including discriminatory application of blasphemy laws and targeted attacks on minorities¹²⁶. It also refers to "important shortcomings" in labour inspections, enforcement of minimum wage laws, and lack of social protections for women and informal workers¹²⁷. These are not bureaucratic oversights but represent institutionalised failures to meet binding international commitments.

The European Parliament has amplified these concerns. Its April 2021 resolution (TA-9-2021-0157) called for a reassessment of Pakistan's GSP+ eligibility, citing the emblematic case of Shagufta Kausar and Shafqat Emmanuel, a Christian couple imprisoned for seven years under blasphemy charges later overturned on appeal¹²⁸. The Parliament stressed that Pakistan's failure to prevent abuse of such laws directly contradicts its obligations under the ICCPR and Convention on the Elimination of Racial Discrimination.

One such case is that of human rights defender Idris Khattak, who was subjected to enforced disappearance in November 2019 and later tried in secret by a military court. As of December 2021, he remains imprisoned without a publicly disclosed verdict or sentence, and his family continues to be denied full information about his legal status¹²⁹.

¹²⁴ European Commission, *Joint Staff Working Document – GSP+ assessment of Pakistan covering the 2016–2017 cycle (published 2018)*, emphasising that implementation lagged despite adoption of laws, citing lack of political will and weak institutional capacity.

¹²⁵ European Commission, *Joint Staff Working Document – GSP+ assessment of Pakistan covering the 2020–2022 cycle* (SWD(2023) 363 final, published 21 November 2023), identifying human and labour rights reform gaps including torture, enforced disappearances, journalistic protections and death penalty.

¹²⁶ Ibid

¹²⁷ Ibid

¹²⁸ European Parliament Resolution TA-9-2021-0157, preamble and para. 7.

¹²⁹ Amnesty International, *Pakistan: Idris Khattak in prison after secret military trial*, 7 December 2021, available at: <https://www.amnesty.org/en/latest/news/2021/12/pakistan-family-of-enforced-disappearance-victim-idris-khattak-must-be-given-clarity>

Persistent constraints on freedom of association in bonded labour sectors remain evident in Pakistan, particularly in Sindh and Punjab, where labour organisers continue to face harassment and barriers to unionisation—despite the country’s obligations under ILO Conventions 87 and 98¹³⁰.

A March 2025 study by the International Commission of Jurists found that military and anti-terrorism courts continued to operate without transparency, breaching Pakistan’s obligations under the Convention Against Torture and ICCPR Article 14 on fair trial rights¹³¹.

This cumulative breach across thematic areas, sustained over multiple GSP+ review cycles, fulfils the definition of a “serious and systematic” failure. The absence of credible institutional reform – despite technical assistance and repeated EU engagement – suggests that the conditionality mechanism has not succeeded in inducing compliance. In this light, Pakistan’s status under the GSP+ should be subjected to formal suspension procedures in accordance with Article 15.

8.5 Summary

The comparative analysis and documented institutional findings demonstrate that Pakistan’s participation in the GSP+ regime no longer meets the standards envisaged under Regulation (EU) No 978/2012. The legal threshold for temporary withdrawal is clear: the Commission must act where there is evidence of serious and systematic failure to implement the relevant conventions.

Compared to other countries suspended from GSP+ or EBA status, Pakistan’s record is equally, if not more, deficient in critical areas. The EU has suspended trade preferences in past cases for violations affecting fewer domains or for lower cumulative severity. For example, Cambodia lost

¹³⁰ International Labour Organization, Comments of the Committee of Experts on the Application of Conventions and Recommendations: Pakistan – Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), ILO, 2023; see also Human Rights Commission of Pakistan, Annual Report 2023, and U.S. Department of State, Trafficking in Persons Report: Pakistan 2024, documenting obstacles to organising and bonded labour prevalence in Punjab and Sindh.

¹³¹ International Commission of Jurists, *Military “Justice” in Pakistan: Legal and Human Rights Implications*, Briefing Paper, 6 May 2025 — concluding that trials of civilians by military courts for offences related to the May 2023 unrest violate Pakistan’s obligations under international human rights law, including fair trial guarantees under Article 14 of the ICCPR, and calling for a comprehensive legal reform to remove military jurisdiction over civilians.

preferences due to political suppression and labour rights abuse, while Sri Lanka's suspension in 2010 followed inadequate implementation of only a subset of conventions. Pakistan's breach spans all four core areas.

To preserve the credibility of the EU's values-based trade policy—and in light of the extension of the current GSP+ framework until the end of 2027, pending the adoption of a revised regulation with enhanced conditionality provisions—the European Commission is encouraged to initiate proceedings under Article 15 of Regulation (EU) No 978/2012 against Pakistan. Such action would establish a formal mechanism to reassess Pakistan's compliance and promote institutional reform through conditional engagement, rather than continued tolerance of persistent non-compliance.

Chapter 9 – Legal Grounds for Initiating Article 15 Proceedings

9.1 Legal Framework

The Generalised Scheme of Preferences Plus (GSP+) is governed by Regulation (EU) No 978/2012, which sets out the terms under which the EU grants unilateral trade preferences to developing countries. Article 15(1)(a) of the Regulation provides for the temporary withdrawal of GSP+ preferences in cases of “serious and systematic violation of principles” enshrined in the international conventions listed in Part A of Annex VIII. These conventions cover human rights, labour rights, environmental protection, and good governance.

Under the mechanism outlined in Article 15, the European Commission may initiate withdrawal proceedings when there is credible and verifiable evidence of such violations. The procedure includes a formal notification to the beneficiary country, a six-month period of monitoring and dialogue, and, if no sufficient improvement is observed, the adoption of a delegated act suspending preferences. This act is subject to scrutiny by the European Parliament and the Council.

The EU's application of trade conditionality was reaffirmed by the adoption of Implementing Regulation (EU) 2025/1206, which suspended Pakistan's

GSP+ preferences for ethanol under Article 30 of Regulation 978/2012 due to market disturbance. While limited in scope, the measure signalled the Commission's continued readiness to enforce conditionality provisions where warranted¹³².

9.2 Application to Pakistan

Pakistan has been a GSP+ beneficiary since 2014, based on its ratification of 27 core conventions. However, over successive biennial reviews, the European Commission and other institutional actors have identified persistent failures in implementation.

The 2023 Commission Staff Working Document (SWD(2023)0363) documented continued abuse of blasphemy laws, lack of protection for religious minorities, systemic labour violations, environmental degradation, and weak anti-corruption enforcement¹³³. The European Parliament's Resolution TA-9-2021-0157 similarly called for a reassessment of Pakistan's eligibility, citing specific cases and widespread structural failures¹³⁴.

In legal terms, these constitute serious and systematic breaches of the international obligations Pakistan undertook when applying for GSP+ status. The consistency of these findings over time, coupled with Pakistan's failure to demonstrate meaningful progress, meets the threshold for initiating proceedings under Article 15 of Regulation (EU) No 978/2012, which provides for temporary withdrawal in cases of persistent non-compliance with human rights and labour standards.

9.3 Procedural Readiness

Article 15 does not require a new or unexpected breach to initiate proceedings. Rather, it permits action where a persistent pattern of non-

¹³² Commission Implementing Regulation (EU) 2025/1206. Official Journal of the European Union. June 2025.

¹³³ European Commission. SWD(2023) 0363 final. Generalised Scheme of Preferences (GSP+) Assessment of Pakistan. November 2023.

¹³⁴ European Parliament. Resolution TA-9-2021-0157 on Blasphemy laws in Pakistan. April 2021.

compliance is established by documented evidence. In Pakistan's case, the following institutional sources confirm such a pattern:

- The Commission's biennial review in SWD(2023)0363, which highlights enduring non-compliance across all four GSP+ pillars;
- The European Parliament's resolution of April 2021, formally requesting a review of Pakistan's status;
- Public monitoring data and human rights reporting, including verified third-party sources;
- Dialogue records between the EU and Pakistan, which show repeated commitments unaccompanied by structural reforms.

The Commission has already completed monitoring missions, issued priority areas for reform, and provided technical assistance. Yet Pakistan has not delivered the required legislative and institutional changes. In fact, some areas – such as judicial independence and civil society space – have deteriorated further in recent years, according to the International Commission of Jurists and Human Rights Watch¹³⁵¹³⁶.

As such, the procedural conditions required under Article 15 have been met. There is no legal impediment preventing the Commission from initiating the withdrawal mechanism. A formal notification to Pakistan and commencement of the six-month enhanced engagement process would be consistent with both the letter and spirit of the Regulation.

9.4 Legal Precedent and Proportionality

The EU has previously suspended preferences under Article 15 and related mechanisms in several cases:

- Sri Lanka (2010): The EU suspended Sri Lanka's GSP+ status on 15 August 2010 due to its failure to effectively implement three core United Nations human rights conventions—the International Covenant on Civil and

¹³⁵ International Commission of Jurists. "Military Courts in Pakistan: Legal and Human Rights Implications." March 2025.

¹³⁶ Human Rights Watch. "Pakistan: Threats to Civil Society Escalating." January 2024.

Political Rights (ICCPR), the Convention Against Torture (CAT), and the Convention on the Rights of the Child (CRC)—during the post-conflict period.

- Cambodia (2020): In February 2020, the EU initiated a partial withdrawal of Cambodia's *Everything But Arms (EBA)* tariff preferences in response to documented political repression and violations of labour and civil rights, including the dissolution of opposition parties, restrictions on independent media, and suppression of freedom of association.
- Belarus (2007): Under the previous GSP framework, Belarus had its preferences suspended in 2007 on the basis of systematic human rights violations—particularly concerning restrictions on trade union rights and broader civil society repression. This case remains a reference point in EU GSP+ precedent.
- Myanmar (1997 and post-2021):
In 1997, the European Union withdrew Myanmar's standard GSP preferences in response to the use of forced labour, based on findings by the International Labour Organization (ILO). This marked one of the earliest applications of trade-related sanctions for serious violations of labour rights. Following the military coup on 1 February 2021, the EU expressed serious concerns over escalating human rights abuses, including arbitrary detentions, suppression of peaceful protest, and erosion of democratic institutions. Although Myanmar remains a beneficiary of the Everything But Arms (EBA) arrangement due to its Least Developed Country (LDC) status, the EU has engaged Myanmar under an “enhanced engagement” process to address potential breaches of its obligations under international conventions. As of September 2025, the EU has not formally suspended Myanmar's EBA preferences, but the situation remains under close review.

In each of these cases, the European Commission relied on a comparable standard: sustained, verified breaches of the core conventions. The threshold was not set at perfection, but at meaningful compliance with international norms and willingness to reform.

Pakistan's situation now meets – and arguably exceeds – the seriousness found in these precedents. For example, while Cambodia's suspension focused on two domains (labour rights and democratic space), Pakistan's breaches span all four GSP+ pillars. Moreover, these violations have persisted

over multiple review cycles, indicating entrenched structural non-compliance rather than temporary setbacks.

Importantly, the suspension of preferences is not punitive. According to the Regulation, it is intended to incentivise reform by signalling the EU's conditionality framework remains credible. In the case of Sri Lanka, trade preferences were later reinstated after improvements were verified. A similar pathway remains open to Pakistan, contingent on demonstrable change.

9.5 Summary

The legal grounds for initiating Article 15 proceedings against Pakistan are both substantively and procedurally sound. Verified documentation by EU institutions demonstrates serious and systematic violations of Pakistan's binding obligations under the GSP+ scheme. These include, but are not limited to:

- Failure to protect freedom of religion and prevent discriminatory enforcement of blasphemy laws;
- Widespread and persistent child labour and bonded labour practices;
- Environmental governance gaps, including hazardous waste mismanagement and biodiversity loss;
- Weak anti-corruption frameworks and politicisation of accountability institutions.

In light of these factors, the European Commission is legally justified in launching Article 15 procedures. Doing so would align the EU's trade instruments with its stated values and commitments under international law.

Chapter 10 – Conclusion and Policy Recommendation

10.1 Summary of Findings

This white paper has systematically examined Pakistan's compliance under the Generalised Scheme of Preferences Plus (GSP+) mechanism, in accordance with Regulation (EU) No 978/2012. Using official monitoring reports, European Parliament resolutions, and evidence from international human rights organisations, the assessment confirms that Pakistan has not met its obligations under the 27 international conventions required for GSP+ eligibility. Violations span all four core conditionality pillars: human rights, labour rights, environmental protection, and good governance.

In the field of human rights, the analysis shows persistent and widespread violations. Enforced disappearances remain an ongoing issue, with the case of Idris Khattak—a human rights defender forcibly disappeared in 2019 and sentenced in a secret military trial—highlighting continued impunity for security agencies¹³⁷. The misuse of blasphemy laws has led to arbitrary detention and mob violence against religious minorities, with Christians, Ahmadis, and Shia Muslims frequently targeted. Despite judicial acquittals in some high-profile cases, the structural flaws in Pakistan's legal framework remain unaddressed.

Labour rights are equally compromised. Bonded labour persists in sectors such as brick kilns, agriculture, and domestic work. Although Pakistan has ratified ILO Conventions 29 and 105 (on forced labour) and 138 and 182 (on child labour), implementation remains inadequate. According to the ILO's 2024 report, inspections are irregular and under-resourced, and legal

¹³⁷ Amnesty International, Pakistan: One year on from enforced disappearance of Idris Khattak, authorities must reveal his whereabouts, 12 November 2020; Human Rights Watch, Pakistan: Investigate disappearance of activist, 4 May 2020; International Commission of Jurists, Idrees Khattak's conviction by a military court is an affront to human rights, 2 February 2021; UN Human Rights Office, press release, UN experts call for release of activist Idris Khattak after five years in detention, 23 December 2024.

protections for informal workers are minimal¹³⁸. The right to organise is often denied, with reports of union leaders being harassed or arrested, especially in the textile sector. These conditions undermine the credibility of Pakistan's adherence to international labour standards.

On environmental protection, Pakistan faces mounting ecological stress but has failed to meet its international commitments. Deforestation, poor waste management, and illegal wildlife trafficking persist despite existing legislation. Climate adaptation efforts remain severely underfunded, and institutional coordination is weak. As of 2025, key strategic documents such as the National Adaptation Plan remain incomplete, while the Climate Change Gender Action Plan has not moved beyond pilot stages. Germanwatch's Global Climate Risk Index 2025 ranked Pakistan as the country most affected by extreme weather events in 2022, primarily due to catastrophic floods that caused widespread loss of life and major economic disruption¹³⁹. This reinforces the urgent need for robust climate mitigation and adaptation strategies in a country marked by heightened exposure and vulnerability.

Governance issues further erode the foundations of GSP+ eligibility. The politicisation of anti-corruption institutions, including the National Accountability Bureau (NAB), continues to impair judicial independence and rule of law. In the Corruption Perceptions Index 2024, released in February 2025, Pakistan ranked 135th out of 180 countries, scoring only 27 out of 100, signalling a persistently high level of perceived public-sector corruption and very limited progress in prosecuting high-level corruption¹⁴⁰. Press freedom is deteriorating, with journalists facing legal harassment, censorship, and physical attacks. Civil society organisations report restrictions on foreign funding and increased surveillance, limiting their capacity to operate effectively. These developments run counter to Pakistan's

¹³⁸ International Labour Organization, *CAN/D Pakistan – Country Annual NORMLEX Report (2025)*, indicating that only 49,391 inspections were conducted from July 2024 to April 2025, including night visits, despite a vast informal workforce; International Labour Organization, *Decent Work Country Programme for Pakistan 2023–27*, noting that informal workers lack formal protections and remain outside statutory labour enforcement frameworks.

¹³⁹ Germanwatch, *Global Climate Risk Index 2025*, press release, 12 February 2025, ranking Pakistan first among countries most impacted by extreme weather events—citing severe economic losses (approximately €13.9 billion) due to 2022 floods. Available at: reliefweb.int / germanwatch.org.

¹⁴⁰ Transparency International, *Corruption Perceptions Index 2024*, published February 2025, ranking Pakistan 135th out of 180 countries with a score of 27/100, down two positions from 2023; available at: <https://www.transparency.org/en/cpi/2024>

obligations under the International Covenant on Civil and Political Rights (ICCPR) and the UN Convention against Corruption (UNCAC).

10.2 Legal and Political Context

Under Article 15(1)(a) of Regulation (EU) No 978/2012, temporary withdrawal of GSP+ preferences is required in cases of "serious and systematic violations" of the principles laid down in the core conventions listed in Annex VIII. The evidence presented throughout this white paper meets that legal threshold.

The European Commission's latest Staff Working Document (SWD(2023)0363) has documented persistent deficiencies in Pakistan's compliance across all four areas of GSP+ conditionality. The European Parliament's Resolution TA-9-2021-0157 explicitly called for a reassessment of Pakistan's eligibility, highlighting failures to protect minority rights and uphold rule of law¹⁴¹. Despite this, no measurable progress has been achieved.

Precedent confirms that the European Commission has acted decisively in similar cases. In 2010, Sri Lanka's GSP+ status was withdrawn following its failure to address enforced disappearances and lack of accountability for war crimes. Cambodia faced partial suspension in 2020 due to political repression and labour rights abuses. These cases involved violations in fewer domains than Pakistan's, suggesting that the current situation justifies full suspension under Article 15.

The political context further underscores the urgency of action. The EU's commitment to a values-based external trade policy requires consistency in applying conditionality. Delayed or selective enforcement undermines the integrity of the GSP+ framework and signals impunity to other beneficiary countries.

10.3 Policy Recommendation

¹⁴¹ European Parliament. Resolution TA-9-2021-0157. "The Blasphemy Laws in Pakistan." April 2021. https://www.europarl.europa.eu/doceo/document/TA-9-2021-0157_EN.html

In view of these findings, the European Commission is urged to immediately initiate procedures under Article 15 of Regulation (EU) No 978/2012. The following five-point action plan is proposed:

1. Initiate the Withdrawal Procedure:

The European Commission should, without further delay, trigger the formal procedure under Article 19 of the GSP Regulation by publishing a notice of intent to withdraw Pakistan's GSP+ status. This notice should clearly set out the legal and factual grounds for action—namely, Pakistan's failure to comply with binding obligations under the 27 international conventions forming the conditionality framework of the scheme, as documented in this paper and in official EU reports. Publication of the notice would commence a six-month monitoring period, during which Pakistan may submit evidence, take remedial action, or demonstrate concrete efforts toward compliance.

2. Define Clear Benchmarks for Reinstatement:

The European Commission, in coordination with the European External Action Service (EEAS), should establish a transparent set of specific, measurable, and time-bound benchmarks that Pakistan must meet in order to retain or regain its GSP+ status. These benchmarks should address structural deficiencies across the core thematic areas of the GSP+ conditionality framework. For example:

- Reform of the blasphemy law, including the removal of the mandatory death penalty and the introduction of legal safeguards to prevent false accusations;
- An end to the trial of civilians in military courts, in line with international fair trial standards;
- Enactment and implementation of legislation prohibiting enforced disappearances, alongside credible steps to investigate past cases;
- A substantial increase in labour inspections, with disaggregated, verifiable data on the registration of independent trade unions;
- Prosecution and conviction in emblematic cases of bonded labour and child labour, demonstrating a credible commitment to enforcement;
- Tangible improvement in Pakistan's Corruption Perceptions Index (CPI) score, through impartial enforcement of anti-corruption laws.

These benchmarks should be formally communicated to the Government of Pakistan as preconditions for avoiding the withdrawal of GSP+ preferences or, in the event of suspension, for any future reinstatement. Such a framework would convert the withdrawal process into a compliance-based roadmap, offering Pakistan a clear and actionable pathway to meet its international obligations.

3. Member States and International Partners:

The European Commission should actively engage with EU Member States to ensure broad consensus within the GSP Committee in support of a suspension decision. Simultaneously, it should seek strategic coordination with international partners—including relevant UN Special Rapporteurs, the International Labour Organisation (ILO), the Office of the High Commissioner for Human Rights (OHCHR), and other multilateral bodies—to reinforce and amplify calls for reform in Pakistan.

The objective is to convey that this is a unified and coordinated international position, rather than an isolated EU initiative. Diplomatic engagement with Pakistan should make clear that the EU remains open to re-engagement under a “more for more” approach, whereby tangible improvements in human rights, labour rights, environmental protection, and governance will be met with reciprocal benefits. However, it must also be emphasised that the EU will not compromise on its treaty-based principles, and that failure to comply with GSP+ obligations will carry consequences.

4. Mitigate Impacts on Vulnerable Groups:

The suspension of GSP+ preferences may have economic repercussions for workers employed in Pakistan’s export-oriented sectors. To minimise unintended harm to vulnerable populations, the European Union should consider implementing targeted mitigation measures alongside the suspension decision. These could include increased development assistance directed toward civil society organisations, labour rights defenders, and affected worker communities, with an emphasis on protecting livelihoods and advancing social protections.

For example, the EU could fund programmes aimed at supporting economic diversification, enhancing local labour standards enforcement, or strengthening the capacity of independent trade unions and NGOs active in the field of human rights and labour rights. Such measures would help ensure that local advocacy efforts are not weakened during the suspension period and that the long-term reform process is domestically rooted.

Public communications should clearly convey that the suspension is a response to non-compliance by the state, not a punitive measure against the Pakistani people. The EU should underscore that its actions are aligned with promoting human dignity and rights, and that the pathway to reinstatement remains open if credible reforms are undertaken.

5. Regular Review and Possibility of Partial Withdrawal:

If a full suspension of GSP+ preferences is considered excessively disruptive in the short term, the European Union may explore the option of a partial withdrawal, targeting specific sectors where violations are most pronounced. For example, suspending preferences on textile exports—Pakistan's largest and most politically significant export sector—would deliver a clear and targeted signal, while mitigating broader economic disruption.

However, a partial approach carries the risk of diluting the clarity and credibility of the EU's conditionality framework. Whether a full or partial suspension is pursued, the European Commission should conduct regular reviews of Pakistan's compliance, ideally at six-month intervals, and report findings to the European Parliament. These reviews should assess measurable progress against the identified benchmarks and inform any adjustment or escalation of the EU's response.

10.4 Final Note

The European Union must act in line with its stated values and the legal obligations enshrined in the GSP+ framework. Pakistan represents a clear and well-documented case of a beneficiary country that has consistently failed to meet the commitments it undertook when applying for GSP+ status. This is precisely the type of situation that the regulation's drafters anticipated, and for which they provided a remedy through the withdrawal mechanism.

The EU has repeatedly affirmed that access to preferential trade arrangements is a privilege, not a right. For the GSP+ scheme to retain its credibility, beneficiary countries must be held accountable when they fall short of the agreed standards. Allowing Pakistan to continue benefiting from tariff preferences despite systemic and ongoing non-compliance undermines the EU's values, weakens its leverage, and dilutes the incentive structure for other current and aspiring GSP+ countries.

Triggering the withdrawal of Pakistan's GSP+ status is now not only legally warranted, but also politically consistent and strategically necessary. Such action would uphold the integrity of the EU's human rights commitments and send a clear signal that the rules of conditional engagement will be enforced.

The objective is not punitive: the purpose of suspension is to incentivise reform. Should Pakistan undertake the necessary measures to meet its international obligations, it could requalify for GSP+ under the next regulatory cycle—this time from a more credible position of compliance.

Until such reforms occur, however, continuing inaction continue to make the EU complicit in rights violations. This white paper urges EU institutions to act decisively and in accordance with both the letter and spirit of the GSP+ Regulation.

Annexes

Annex I – Compliance Summary Table: Pakistan's GSP+ Performance

Compliance Pillar	Treaty Obligations	Current Status (2023–2025)	EU Institutional Assessment
Human Rights	ICCPR, CAT, CRC, ICERD, CEDAW	✗ Serious, persistent violations	SWD(2023)0363; TA-9-2021-0157
Labour Rights	ILO Core Conventions (C029, C087, C098, etc.)	✗ Widespread abuse, weak enforcement	SWD(2023)0363; EU monitoring dialogue
Environmental Protections	UNFCCC, CBD, Basel, Stockholm, Rotterdam Conventions	✗ Inadequate governance, severe pollution	SWD(2023)0363; EU Delegation reporting
Good Governance	UNCAC, ICCPR (Articles 2, 14, 25)	✗ Politicised institutions, judicial interference	Parliament resolution (TA-9-2021-0157); Commission findings SWD(2023)0363
EU Legal Instruments	Regulation (EU) No 978/2012; Implementing Regulation 2025/1206	Breach of Article 15 conditionality	Commission monitoring confirms threshold met

Legend:

✓ = Compliant; ~ = Partially Compliant; ✗ = Non-Compliant

Annex II – Precedent-Based Comparison of GSP, GSP+ and EBA Suspensions

Country	Year of Suspension	Triggering Issue(s)	Compliance Profile Before Suspension
Sri Lanka	2010	War crimes, human rights abuses, weak judiciary	✗ in Human Rights and Governance
Cambodia	2020 (partial)	Crackdown on political opposition, civil society restrictions	✗ in Labour Rights, Political Rights, Governance
Belarus	2007 (full GSP removal)	Systematic violations: Forced labour, political repression	✗ in Labour Rights, Human Rights, Governance
Myanmar	Under review since 2021	Military coup, mass human rights violations	✗ in all major compliance pillars, especially HR and Governance
Pakistan	—	Documented systemic non-compliance across all four core GSP+ conditionality areas	✗ in all four pillars; eligible for suspension under Art. 15/19

Annex III – Core GSP+ Conventions and Pakistan’s Ratification Status

Convention	Ratified	Effective Implementation	Evaluation
International Covenant on Civil and Political Rights (ICCPR)	Yes	X	Persistent violations of freedoms of expression, religion, and minority rights; judiciary lacks independence.
Convention Against Torture (CAT)	Yes	X	Torture remains widespread, particularly in detention; safeguards not implemented; impunity prevails.
Convention on the Rights of the Child (CRC)	Yes	~	Partial reforms in child protection, but major concerns remain over child labour and juvenile justice.
International Labour Organization Core Conventions (e.g. C29, C87, C98)	Yes	X	Bonded labour, anti-union repression, and poor enforcement widely reported.
UN Convention against Corruption (UNCAC)	Yes	X	Anti-corruption institutions are politicised; limited enforcement or prosecution in high-level cases.
UN Framework Convention on Climate Change (UNFCCC)	Yes	X	Governance remains fragmented; poor implementation of transparency and adaptation measures.
Convention on Biological Diversity (CBD)	Yes	~	Some initiatives exist, but ecosystem loss and pollution remain serious problems.
Stockholm, Basel, and Rotterdam Conventions	Yes	X	Weak institutional capacity to manage hazardous waste; persistent compliance failures reported.

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4. European Parliament Resolution TA-9-2021-0157, adopted 29 April 2021
5. European Parliament Procedure File 2021/2647(RSP): [https://oeil.secure.europarl.europa.eu/oeil/en/procedure-file?reference=2021/2647\(RSP\)](https://oeil.secure.europarl.europa.eu/oeil/en/procedure-file?reference=2021/2647(RSP))
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