

Committee on the Application of Standards

Date: 19 May 2025

Governments appearing on the preliminary list of individual cases have the opportunity, if they so wish, to supply on a purely voluntary basis, written information before 19 May 2025.

▶ Information on the application of ratified Conventions supplied by governments on the preliminary list of individual cases

Pakistan (ratification: 1953)

Labour Inspection Convention, 1947 (No. 81)

The Government has provided the following written information.

With the technical support of the ILO Country Office, Pakistan is undertaking unprecedented steps to revamp labour inspection mechanisms in line with the provisions of the Convention.

Provincial labour codes have been updated to align with the Convention, granting labour inspectors the right to conduct random inspections. Khyber Pakhtunkhwa (KPK) Province has developed the occupational safety and health (OSH) Rules of Business, while Sindh Province has established a provincial OSH programme.

Punjab Province's OSH initiatives are being supported through the Provincial Annual Development Programme (ADP). At the national level, a comprehensive OSH profile has been launched to guide policy and implementation.

Additionally, Pakistan ratified the Labour Statistics Convention, 1985 (No. 160), in January 2025, enabling the National Statistics Office to collect data on occupational accidents and diseases. To optimize labour inspection resources, strategic compliance plans have also been adopted.

The consolidated details of labour inspection staff of the Directorate of Labour in KPK Province are given in the table below:

Total sanctioned posts	139
Occupied posts	79
Vacant posts	60

Interviews for 35 labour inspectors have been conducted; recruitment notifications will be issued soon. The remaining posts are being filled. Inspectors will enforce OSH under the Khyber Pakhtunkhwa Shops and Establishment Act 2015.

Factory inspectors enforce OSH under the Khyber Pakhtunkhwa Factories Act 2013 with two technical inspectors (one post is still vacant). An OSH centre was set up under a 2017 Annual Development Programme scheme, revised in 2022, and is under further revision until 2027.

From July 2024 to April 2025, the Labour Department conducted 49,391 unannounced inspections, including night visits, as permitted by law. These inspections ensure integrity and face no legal challenges despite occasional employer complaints.

Details of occupational accidents and diseases in KPK Province for the period July 2024 to April 2025 are given below:

S. No.	Particulars	Statistics
1.	No. of cases of occupational disease notified	Nil
2.	Particulars of the classification of such cases	Nil
3.	Total number of industrial accidents notified	1
4.	Total number of industrial accidents by industry and occupation	Industrial establishment
5.	Fatal	Nil
6.	Non-fatal	1 (minor injuries)

Further, the Khyber Pakhtunkhwa Factories Rules, 2023 have been duly notified wherein the process of notification of accidents has been elaborated in detail. The Rules can be accessed via the official website of the Directorate of Labour. Furthermore, the rules for the Khyber Pakhtunkhwa Social Security Act, 2021 are in development.

As far as obstruction records are concerned, the KPK Labour Department has developed the pro formas wherein progress has been recorded. The consolidated report for the period July 2024 to April 2025 is as follows:

No. of cases lodged	Previous pending cases	Cases decided	Fines imposed in Pakistan rupees	Pending cases
62	40	20	119 000	82

KPK Province enacted the Mines Safety, Inspection and Regulation Act 2019 to consolidate and update mining OSH laws, strengthen inspections and revise penalties. Seven mines inspector posts have been filled under this improved legislation.

For the year 2024, inspections-related data is as follows:

S. No.	Action	Remarks
1.	No. of inspections	2 858
2.	No. of notices issued	563
3.	No. of orders issued under section 28(4) for prohibition of employment	118

S. No.	Action	Remarks
4.	No. of orders issued under section 30(1) for closure of mines	17
5.	Fines imposed against the violators	5.2 million rupees
6.	Prosecutions lodged against offenders	122
7.	Total accidents	56 (fatal)

Punjab has enacted the Occupational Safety and Health Act 2019, with rules pending approval. Factory inspectors are qualified, selected through competitive exams, and trained at two Lahore institutes to enforce health and safety under the Factories Act 1934 and the Prevention of Sexual Harassment of Women at Workplace Act (POSH) Act 2019.

The Punjab Labour Department has also planned to increase the number of inspectors for industrial and commercial establishments. The creation of 36 posts of female inspectors for inspection of workers in sectors like domestic and home-based work have been processed. The details are as follows:

Sr. No.	Name of post with basic pay scale (BPS)	Existing sanctioned posts	Proposed additional posts
1.	Labour officers (BPS-16)	71	56
2.	Labour inspectors (BPS-14)	83	57
	Total	154	113

The number of inspections conducted under different labour laws in Punjab without prior intimation for the period from 1 January 2023 to 31 March 2025 is as follows:

Sr. No.	Name of the law	Inspections	Prosecutions	Fines imposed (rupees)
1.	Factories Act 1934	49 773	25 146	13 636 750
2.	Shops and Establishment Ordinance 1969	282 416	168 474	18 452 600
3.	Punjab Minimum Wages Act 2019	287 404	150 384	26 597 400

In the month of April 2025, 1,302 inspections were carried out, 298 establishments were prosecuted and 214 establishments were provided advisory services.

In 2024, over 25 new Punjab labour inspectors completed mandatory one-month OSH induction training. To promote gender balance, 15 per cent of recruitment seats are reserved for women. In 2023–24, 37 cars and 160 motorcycles were provided, with 196.02 million Pakistan rupees allocated for travel expenses.

Inspections in Punjab are conducted through a real-time online inspection system. The statistics for the year 2024 are:

Category	Inspections	Prosecutions	Cases decided	Fines (rupees)
Factories	17 439	80 90	6 321	13 779 600
Shops	120 031	67 813	35 939	18 772 170

The present penalty for obstruction of an inspector under the Factories Act 1934 is 20,000 rupees. In the Punjab Labour Code 2025, the penalty for obstruction of an inspector has been proposed from 7 to 70 units, where 1 unit is equivalent to the prevailing minimum wage. Punjab regularly sends Annual Inspection Reports to the Ministry of Overseas Pakistanis and Human Resource Development for publication.

There are 225 labour inspectors in Punjab. The details are as follows:

Post	BSP	Sanctioned	Filled	Vacant
DGLW/Chief inspector	20	1	1	0
Director/Inspector	19	12	11	1
Deputy director/Inspector	18	12	10	1
Assistant Director/Inspector	17	49	38	11
Technical inspector of factories	17	2	1	1
Labour officers	16	69	53	16
Labour inspectors	14	80	73	7
Total		225	187	38

Under Section 11 of the Factories Act 1934, labour inspectors are empowered to freely enter any workplace for inspection. The absence of a requirement for prior notification inherently allows for unannounced inspections. Rule 7 of the “Punjab Factories Rules, 1978” provides details off the process of inspections, implying the authority to conduct them without prior notice. The Punjab Labour Code 2025 further explains the functions of inspector in detail.

Data on inspections in Punjab is as follows:

Sr. No.	Name of the law	Inspections	Prosecutions	Fines imposed (rupees)
1.	Factories Act 1934	49 773	25 146	13 636 750
2.	Shops and Establishment Ordinance 1969	282 416	168 474	18 452 600
3.	Punjab Minimum Wages Act 2019	287 404	150 384	26 597 400

Data on industrial incidents in Punjab is as follows:

Number of incidents	Nature of accidents		No. of affected workers	
	Minor	Fatal	Injured	Death
30	12	18	24	25

At present, Schedule III of the Workmen Compensation Act 1923, provides list of 14 occupational diseases for which the compensation is obligatory for the employer. Schedule 7 of the newly drafted Punjab Labor Code provides a list of 14 identified occupational diseases.

To ensure the safety of mines and mine workers, the Chief Inspectorate of Mines, Punjab, had undertaken the following initiatives:

- digitization of inspection regime/online inspections;
- awareness safety seminars/regular mine rescue training courses at mine rescue stations;
- establishment of two new inspecting offices at Sialkot and Chakwal District;
- four new posts of inspecting officer have been created; establishment of mine sample testing lab and two new mines rescue and safety substations.

The last five years' data on inspections conducted, prosecutions lodged, fines recovered, accidents etc. is as follows:

Sr. No.	Description	2021	2022	2023	2024	2025 (up to April)
1.	No. of mines/quarries	2 700	2 750	3 102	3 649	3 854
2.	No. of mine workers	36 500	37 000	38 000	39 000	40 000
3.	Inspections conducted	1 084	1 075	1 252	1 397	527
4.	Prosecutions lodged	1 478	1 084	1 338	3 690	949
5.	Prosecutions decided	785	378	415	1 927	1 279
6.	Fines recovered (in millions of rupees)	0.66	0.90	0.957	1.868	0.569
7.	Fatal accidents occurred	49	41	35	35	8
8.	Persons died	53	46	36	43	10
9.	Serious accidents occurred	7	11	11	3	1
10.	Persons injured	7	12	13	6	1

The Labour and Human Resources Department, Sindh Province, with ILO support, has consolidated 21 labour laws into a single Sindh Labour Code in the first phase, and plans to consolidate five social security laws into a Sindh Social Security Code in the second phase. These reforms aim to protect workers' and employers' rights and improve the ease of doing business.

Following the 13th STLSC meeting on 14 November 2024, the Department held ten consultative meetings with stakeholders from 18 December 2024 to 26 February 2025.

Suggestions received were incorporated, and the Draft Sindh Labour Code has been sent to the Law Department for vetting and legislation.

Further, trainings are frequently being imparted to OSH inspectors and professional qualifications have been made mandatory for the appointment of OSH inspectors.

Sindh has reserved a special quota for women in recruitment, while also allowing them to compete on general merit for labour inspector posts. The Sindh Labour Department is digitizing inspections and seeking more vehicles for effective field operations.

Further, the Draft Sindh Labour Code being sent for approval and enactment, bears adequate penalties for offences under various labour laws.

The Chief Inspectorate of Mines, Sindh, has adequate legal provisions related to conditions of work and protection of workers. These include the:

- Sindh Metalliferous Mines Act 2021 (upgraded as per legal consultancy and recommendation of ILO standard);
- Consolidated Mines Rules 1952;
- Metalliferous Mines Regulations 1926; and
- Sindh Coal and Metalliferous Mines Supplementary Regulation 1986.

There are 21 inspectors who are all mining engineers. A total of 209 sites have been inspected with fines of 333,400 rupees being imposed. In terms of the number of fatal accidents, in Sindh Province, small-scale open-pit mining is being carried out in mines other than coal, that is metalliferous mines except cement quarries, which are few in number with up to the mark safety measures. During the last five years, the number of total accidents was only three.

Further, the fine for violating the provisions of the Sindh Metalliferous Mines Act has been increased. The minimum fine is 25,000 rupees and the maximum fine is 500,000 rupees.

The Balochistan Occupational Safety and Health Act 2022, which is aligned with ILO Convention No. 81, establishes a legal framework and labour inspection system for formal and informal sectors. Draft rules were developed through tripartite consultations, and the OSH Council was formed to guide policy and implementation.

To strengthen inspection capacity, six qualified industrial hygienists were appointed in 2022 to conduct inspections and advise on occupational hazards. With ILO support, OSH training sessions were held in 2023 and 2024 to enhance inspectors' skills.

Labour Welfare Department inspectors are authorized to enforce OSH laws, issue compliance notices, and initiate prosecutions. Out of 133 sanctioned inspector posts, 94 are filled, with recruitment under way to fill 39 vacancies.

Detailed inspection data for the year 2024 is shown below:

Total No. of inspections	No. of cases filed	Cases decided	Cases pending	Fines imposed (rupees)
417	33	31	2	320 000

Under the Balochistan Occupational Safety and Health Act 2022, article 3(1)(a) and (b) require inspectors to monitor compliance with rules regarding work hours, safety, health, welfare and youth employment, and provide technical advice to employers and workers.

Corrective guidance is often given before legal action is taken, especially in sectors like brick kilns and small industries.

Only one case of occupational disease was reported in Balochistan Province through the Balochistan Employees Social Security Institution (BESSI), which was later confirmed as a communicable disease, not a work-related one. No further cases have been reported, and there is no upward trend. The department remains committed to improving disease surveillance and reporting.