



# Unveiling Exploitation and Abuse in the Brick Kilns of Punjab

National Commission for Human Rights, Pakistan

This report highlights serious human rights abuses in Punjab's brick kiln industry, including bonded labour and gender-based violence. Based on field research and survivor accounts, it calls for urgent reforms to protect the rights and dignity of thousands of exploited workers.



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and Abuse in the  
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National Commission for Human Rights, Pakistan





Unyielding Exploitation and Abuse in the Brick Kilns of Punjab



## NCHR:

The National Commission for Human Rights (NCHR) is a statutory body established under the NCHR Act XVI of 2012. The Act stipulates a broad and overarching mandate for the promotion and protection of human rights, in line with Pakistan's Constitution, domestic laws and international treaties. The NCHR has been accredited as an A-status National Human Rights Institution (NHRI) by the Global Alliance of National Human Rights Institutions (GANHRI), a UN-linked body. As part of its statutory function, the Commission along with investigating human rights violations and providing relief to the victims, reviews and proposes legislation from a human rights perspective.

## PPI:

Pakistan Partnership Initiative is a collaborative endeavor launched in 2017 and is registered under the Societies Act 1860. The major focus of the initiative is on strengthening institutions with capacity building and resource mobilization so that they can provide maximum service delivery to their communities. The pursuit for women empowerment and gender equality is at the core of PPI's work. Gender perspective is manifested in its institutional objectives and gender mainstreaming is an embraced strategy that is promoted to run throughout all its programs.

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# Foreword



**Rabiya Javeri Agha**

*Chairperson, NCHR*

In my years working closely with marginalized communities across Pakistan, I have encountered stories from the brick kiln industry that have left an indelible mark on me. Among them, one stands out: a woman, just ten days after giving birth, forced back into grueling labor. Her body still aching, she molds bricks under the relentless sun, crouched in a painful position that denies her any chance of healing. At home, her newborn cries out for nourishment and comfort, while four other young children compete for her attention in a cramped, unsafe dwelling with no sanitation and no respite.

This is not an isolated case. It is one among thousands each telling a story of unimaginable hardship and extraordinary resilience.

Each of these narratives compels us not only to listen but to act. This second volume published by the National

Commission for Human Rights (NCHR) is a continuation of our effort to shine a spotlight on the deeply entrenched system of bonded labour in Pakistan's brick kilns. Building upon the findings of our previous report, this volume documents with painful clarity the persistence of bonded labour, despite national legislation and international commitments that explicitly prohibit such practices.

Through rigorous research and deeply personal testimonies, this report lays bare the structural injustices that define life in the kilns: wage exploitation, unsafe working conditions, and widespread gender-based violence. It does not merely speak to the physical toll of this labour; it also reveals the psychological and generational scars it leaves behind.

The NCHR team and its partners deserve the highest commendation for their compassionate and meticulous approach. Their efforts have given voice to those who have been silenced by fear, stigma, and systemic neglect.

This report is more than a documentation of suffering. It is a call to action. It urges policymakers, civil society, and all actors working for human rights and labour justice to move beyond acknowledgement and toward meaningful change. Robust reforms, strict enforcement of existing laws, and



targeted protection mechanisms for vulnerable workers are not just policy recommendations, they are moral imperatives.

Equally important is the need to raise awareness among the broader public. We must begin to see bricks not merely as building materials, but as symbols of the human lives that produce them. Behind each one lies sweat, suffering, and in too many cases bonded or child labour. It is time to demand transparency in this supply chain, just as we have in other industries.

We must work toward creating an ethical certification system or branding mechanism that ensures bricks are made free of exploitation. Consumers, contractors, and institutions not only deserve the ability to make informed and ethical choices, but also share the responsibility to do so. The burden of invisible suffering should no longer be laid into the foundations of our homes, schools, or workplaces.

Let this report serve not only as a record of injustice but as a catalyst for change. Let it be the start of a movement that transforms empathy into action, silence into advocacy, and systemic exploitation into a shared resolve for justice.





# Executive Summary

The brick kiln industry in Pakistan continues to perpetuate systemic human rights violations, significantly impacting vulnerable groups, particularly women and children, through bonded labour and severe exploitation. Despite international obligations and domestic legal measures, abuses persist predominantly in Punjab, which hosts over half of Pakistan's brick kilns and employs approximately 186,000 workers.<sup>1</sup>

This report builds upon a prior national report by the National Commission for Human Rights (NCHR),<sup>2</sup> providing an in-depth examination of exploitation and abuse within Punjab's brick kiln sector. It highlights the multiple layers of harassment experienced by workers, ranging from exploitative working conditions and persistent verbal abuse to severe forms of physical violence.

The primary elements contributing to exploitative working conditions include the denial of fair wages, exposure to hazardous working environments, unhygienic and unsafe living conditions, and the absence of social security provisions or formal employment contracts. Collectively, these factors perpetuate persistent cycles of debt bondage. Women, in particular, face heightened vulnerabilities, enduring

compounded pressures from forced labor linked to debt bondage, while simultaneously being subjected to sexual harassment and forced marriages.

The cumulative impact of these exploitative working conditions and harassment profoundly undermines workers' physical and mental health. The absence of personal protective equipment (PPE) during work, combined with unhygienic and inadequate sanitation facilities, exacerbates severe health conditions such as chronic respiratory illnesses, musculoskeletal disorders, reproductive health complications. When coupled with the persistent threat and ongoing experiences of abuse, these conditions result in severe mental health issues, including acute psychosocial distress and lasting psychological trauma.

The research involved quantitative surveys with 200 workers, qualitative interviews with 25 survivors, and extensive consultations with key stakeholders, including officials from the Punjab Labour Department and representatives from prominent trade unions, most notably the Brick Kiln Owners Association of Pakistan (BKOAP). These engagements ensured a comprehensive understanding of brick

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<sup>1</sup> As extracted by the Punjab Labour and Human Resource Department

<sup>2</sup> The full report is accessible through the following link.

<https://nchr.gov.pk/wp-content/uploads/2023/08/The-Issue-of-Bonded-Labour-in-Pakistan.pdf>



kiln operations and their associated dynamics. The study identifies significant legal and institutional failures, particularly highlighting the inadequate functioning and limited effectiveness of District Vigilance Committees, thereby emphasizing an urgent need for robust reforms.

To address these issues, the report recommends:

- Ratifying relevant International Labour Organization (ILO) conventions.
- Amending existing health and safety legislation to enforce minimum workplace standards.
- Institutionalizing gender-sensitive oversight by appointing female labour inspectors.
- Integrating anti-harassment protections into existing bonded labour legislation.

- Establishing a centralized digital complaint management system.
- Strengthening District Vigilance Committees (DVCs) and improving social protection mechanisms.
- Developing a dedicated rehabilitation fund for rescued bonded labourers.
- Promoting sustainable and productive brick kiln practices.

Immediate implementation of these recommendations is critical to dismantle systemic exploitation, protect fundamental human rights, and restore dignity to workers in Pakistan's brick kiln industry.









# Chapter 1

## Introduction

Bonded labour, widely regarded as a form of modern-day slavery, remains one of the most persistent and overlooked human rights crises in Pakistan. Despite policy reforms and international attention, more than a million workers remain trapped in exploitative labour arrangements that span generations.<sup>3</sup> Pakistan currently ranks 18th globally and 4th in Asia and the Pacific on the Global Slavery Index, underscoring the urgency of systemic action.<sup>4</sup>

While our previous report provided a national overview, the current report offers a deeper and more targeted examination of Pakistan's brick kiln industry, one of the most pervasive yet under-regulated sectors characterized by bonded labour.

Pakistan is the third-largest producer of bricks in South Asia, with kilns operating across the country. The province of Punjab remains the epicentre, hosting over 52% of the country's total kilns and serving as the focus of this investigation. According to data from the Punjab Labour and Human Resource Department (August 2025), the province has 6,544 registered brick kilns employing an estimated 186,299 workers, many of whom remain beyond the reach of formal labour protections.

Despite their critical role in Pakistan's construction economy, brick kilns remain largely informal entities operating with minimal regulatory oversight. Workers are recruited and retained through a cash-advance mechanism known as *peshgi*, a practice that frequently results in debt bondage. These cash advances are seldom documented, often deliberately manipulated, and subsequently become tools for prolonged exploitation and control.

Women and children are especially vulnerable within this environment. From lower wages to heightened exposure to verbal, physical and sexual abuse, they face compounded forms of marginalization and exploitation. Cultural stigma, lack of awareness, and fear of reprisal mean that much of this abuse remains hidden and unreported.

By highlighting these abuses and identifying patterns of exploitation, this report aims to build upon and further strengthen the findings of the All-Party Parliamentary Group's (APPG) report<sup>5</sup> and the ILO report.<sup>6</sup> It seeks to address critical data gaps, reinforce

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3 "A study of deficits in the fundamental principles and rights at work in the brick kiln supply chain," *International Labour Organization (ILO) 2022*, pg 21 [https://researchrepository.ilo.org/view/pdfCoverPage?instCode=41ILO\\_INST&filePid=13100862450002676&download=true](https://researchrepository.ilo.org/view/pdfCoverPage?instCode=41ILO_INST&filePid=13100862450002676&download=true) (accessed 25 June 2025)

4 "The global slavery index 2023," [walkfree.org, https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf](https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf) (accessed 25 July 2025)

5 David Alton, "Exploitation of bonded brick kiln labourers in Pakistan: the unseen modern day slavery," All-Party Parliamentary Groups (APPGs), 29 May 2024,

<https://www.davidalton.net/2024/05/29/appg-for-pakistani-minorities-report-exploitation-of-bonded-brick-kiln-labourers-in-pakistan-the-unseen-modern-day-slavery/> (accessed 25 July)

6 "A study of deficits in the fundamental principles and rights at work in the brick kiln supply chain," *International Labour Organization (ILO) 2022*, pg 21 [https://researchrepository.ilo.org/view/pdfCoverPage?instCode=41ILO\\_INST&filePid=13100862450002676&download=true](https://researchrepository.ilo.org/view/pdfCoverPage?instCode=41ILO_INST&filePid=13100862450002676&download=true) (accessed 25 June 2025)

evidence-based advocacy, and guide the development of sustainable interventions.

## **Objectives of the study:**

The primary objective of this study is to uncover the true extent of abuse and exploitation faced by bonded labourers in Pakistan's brick kiln industry. It aims to comprehensively examine all forms of abuse—including physical, emotional, economic, and sexual—experienced by workers, with a particular focus on women. It seeks to identify recurring patterns of mistreatment and generate insights that can inform more effective and targeted interventions. Additionally, the study explores the impact of such abuse on the physical and mental health of labourers, highlighting the urgent need for systemic reforms and stronger protective mechanisms.

## **Structure of the report:**

Each chapter addresses a critical aspect of bonded labour in Pakistan's brick kiln sector:

**Chapter 2** outlines the methodology used in the study, detailing the process of collecting both primary and secondary data through qualitative and quantitative approaches.

**Chapter 3** explores the mechanisms of labour exploitation, including the denial of minimum wage, exploitative employment terms, and the extremely poor working and living conditions faced by workers.

**Chapter 4** delves into the prevalence of various forms of abuse, such as verbal harassment, physical violence, and instances of abduction.

**Chapter 5** focuses specifically on gender-based violence (GBV), highlighting how spatial isolation and the concentration of power among managers and owners increase the vulnerability of women workers.

**Chapter 6** examines the toll that harassment and unsafe working environments take on the physical and mental health of labourers.

**Chapter 7** critically assesses the lack of enforcement of legal protections, and evaluates the roles played by trade unions and non-governmental organizations (NGOs) in advocating for workers' rights.

**Chapter 8** offers actionable recommendations aimed at eliminating abuse and harassment within the brick kiln sector.







# Chapter 2

## Methodology

### Overview and Data Collection Tools used:

This chapter provides a detailed explanation of the research design, and scope used in this study to investigate the various forms of abuse experienced by bonded labourers in the brick kiln industry of Punjab, Pakistan.

The study began with a detailed literature review to ensure a comprehensive understanding of the existing information and data on bonded labour in the brick kilns. This included a desk review of both primary and secondary sources.

Building on the international and national legal frameworks outlined in Volume I, the review of primary sources focused on an in-depth analysis of provincial laws in Punjab. The objective was to identify legal and procedural gaps in addressing abuse within the context of bonded labour. This analysis also examined official complaints, First Information Reports (FIRs), and legal actions taken by the Punjab Police Department and the judiciary, in order to assess the current enforcement landscape and uncover systemic failures that allow such abuses to persist. For secondary sources, the study assessed research conducted by various NGOs and government departments to build on existing knowledge and avoid duplication of efforts in understanding

bonded labour in the brick kiln sector.

A mixed-method approach was then adopted, combining quantitative and qualitative methods to gather timely data and assess the extent of workers' deprivation of basic labour rights. This approach captures both the breadth and depth of the problem, providing a solid foundation for evidence-based recommendations and interventions. The main data collection tools used under this study include:

- **In Person Surveys:** The quantitative component involved a total of 200 structured in-person surveys conducted with brick kiln laborers to obtain direct and candid responses. 100 surveys were conducted in Kasur and another 100 in Faisalabad. These surveys aimed to collect statistical data on the prevalence, forms, and patterns of abuse, as well as information on demographics, working conditions, and access to support services.
- **One on One Interviews:** The qualitative component consisted of in-depth interviews with key stakeholders to gain nuanced insights into the socio-economic and cultural factors that contribute to workers' vulnerability, along with the psychological and physical impacts of abuse. A total of 25 in-depth interviews were conducted with



rescued survivors of bonded labour from brick kilns in Kasur and Faisalabad. From these interviews, detailed case studies were developed to document the various forms of exploitation—including physical abuse, sexual abuse, adverse effects on health, and unsafe and inadequate working conditions. These case studies provide a deep understanding of the lived experiences of survivors, highlighting both the complexities of exploitation and the resilience demonstrated in their efforts to overcome adversity. Additionally, semi-structured interviews were conducted with key institutional stakeholders. These included the Chairmen of two major trade unions, the Brick Kiln Owners Association of Pakistan (BKOAP) and the Bhatta Mazdoor Union, as well as the Secretary of the Punjab Labour Department. The aim was to assess how effective existing support systems and institutional responses are in addressing bonded labour.

## Triangulation of Data

The findings on victims of bonded labour were triangulated using multiple quantitative and qualitative data sources to ensure a more comprehensive and nuanced understanding of the issue. Interviews were conducted with diverse groups, including brick kiln workers, kiln owners, and government officials, to

capture a range of perspectives and mitigate potential biases. This triangulated analysis offered a holistic view of the current situation, particularly regarding the awareness, attitudes, and enforcement of laws related to bonded labour in Punjab's brick kiln industry.

## Sampling Strategy and Sample Size:

The sampling strategy for this study was designed to ensure both representativeness and diversity within the sample population. For the quantitative component, a stratified random sampling method was employed. The target population was divided into two strata based on the selected regions: Faisalabad and Kasur. These districts were chosen because they have the highest concentration of brick kilns amongst the 36 districts in Punjab where brick kilns are operational—with 834 kilns in Kasur and 607 in Faisalabad.<sup>7</sup> From each stratum, random samples were drawn to ensure geographic and demographic representation.

Demographic variables such as age and gender were deliberately considered to ensure inclusivity. The surveys were equally distributed among men, women, and children working at the brick kilns. Considering time and accessibility constraints, as well as the need to maintain the quality of the research, the sample size was limited to 100 surveys per district, resulting in a total of 200 surveys.

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<sup>7</sup> Ghulam Muhammad Shah, "Towards an environment-and-worker- friendly brick kiln sector in Punjab, Pakistan," *International Centre for Integrated Mountain Development (ICIMOD)*, pg 13, <https://lib.icimod.org/records/5hy92-nz379> (accessed 25 July)



For the qualitative component, a purposive sampling strategy was adopted. Participants for in-depth interviews and case studies were intentionally selected to ensure a diverse range of perspectives and experiences. This group included survivors of bonded labour from varying age groups and backgrounds, as well as key stakeholders such as kiln owners, law enforcement officials, and NGO representatives.

## Data Processing and Analysis Method

To facilitate efficient data collection and analysis, survey responses were digitized using Google Forms. This tool enabled structured data entry and automatic compilation of responses into spreadsheets, allowing for streamlined data cleaning and organization.

The analysis involved both descriptive and prescriptive approaches:

- **Descriptive analysis** was used to summarize and present the data, offering an overview of trends, frequencies, and general patterns observed in the responses.
- **Prescriptive analysis** was then employed to interpret the findings in context and to suggest actionable recommendations based on the data.

A drill-down approach was adopted to examine specific subsets and key variables within the data, enabling a more detailed understanding of particular issues such as working conditions, access to services, or types of abuses reported.

## Ethical Considerations:

Ethical considerations are a central focus of the study. All participants are assured of confidentiality, and their identities are anonymized in the data collection and reporting process. Informed consent is obtained from participants before their involvement in the study, and they are provided with detailed information about the research objectives and procedures. Field researchers undergo sensitivity training to ensure they are equipped to handle the emotional and psychological needs of participants, particularly survivors of abuse. Additionally, participants who disclose experiences of abuse are provided with information about available support services, including counseling and legal aid.

## Limitations of Methodology:

While this study applied a robust mixed-methods approach to explore bonded labour in Punjab's brick kiln industry, several limitations should be acknowledged.

Accessing bonded labourers was a major challenge due to their restricted mobility, fear of surveillance or retaliation which made it difficult for researchers to reach or engage with them freely, potentially affecting the depth and diversity of voices represented. Low literacy rates and the use of regional dialects among workers occasionally posed challenges in ensuring clear and accurate communication. Although local field teams mitigated this with translations and support, the potential for misinterpretation or incomplete understanding remained. Given logistical and security concerns, the time



allocated for field research was limited. This restricted the researchers' ability to conduct follow-ups, prolonged observation, or repeated interviews, which may have enhanced the validity of the findings. In some cases, access to participants was mediated or monitored by brick kiln owners or managers. This gatekeeping may have influenced participants' willingness or ability to speak freely, especially about exploitative practices.

Experiences of abuse, particularly sexual exploitation and violence, are often underreported due to fear, stigma, shame, and social taboos. Female and child respondents, in particular, may have felt unsafe disclosing sensitive experiences, even in confidential settings, which likely resulted in gaps in the data.

The geographic focus of the study, limited to Faisalabad and Kasur, was based on the high concentration of brick kilns in these districts. However, this may make it difficult to apply the findings to other regions of Punjab that have different socio-economic, legal, or cultural dynamics.

Reliance on self-reported data through surveys and interviews introduced risks of recall bias and social desirability bias, as participants may have been hesitant to share sensitive or incriminating information. Finally, limited participation by government officials and the absence of longitudinal data made it difficult to fully assess institutional accountability or track changes in labour conditions over time.









## Chapter 3

# Labour Exploitation At The Brick Kilns

The brick kiln sector remains one of the most exploitative work environments in Pakistan, sustained by the pervasive peshgi (advance payment) system that traps workers in cycles of debt bondage, often without full awareness of its long-term consequences. This coercive practice disproportionately affects society's most vulnerable groups, such as those without formal education, alternative employment options, or institutional support. According to the NCHR's survey, 97.6% of workers entered the sector due to urgent financial need for an initial loan. This dependency locks them into ongoing cycle of hardship.

*Did you take any loan or advance payments from your employer?*



The Brick Kiln industry is subject to the Payment of Wages Act 1936 which governs wage structures and the Factories Act 1934 which regulates working and living conditions. However,

there are widespread systemic violations in the brick kiln sector. These include denial of minimum wage, relentless workloads, and subhuman working and living conditions.

The story of *Asma Bibi*<sup>8</sup> illustrates this brutal reality. Asma, mother of five, has spent over two decades in Punjab's brick kilns. She recalls the moment her family fell into bondage. Her husband, Irfan, was approached by a jammadar — a middleman — who offered him a loan in exchange for their labour. Unemployed and desperate to cover the costs of her pregnancy, Irfan accepted the offer. He thought he had secured a lifeline but in reality, he had become a bonded labourer.

Like thousands of others, they received no written contract or clear explanation of employment terms, leaving them excluded from legal protections and unaware of their growing debt. Decades later, their children remain in the same kiln compound, inheriting the same burdens. This grim reality is reflected in the NCHR survey, in which 96.8% of respondents felt bound by debt with no hope beyond the kilns.

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<sup>8</sup> All names used in this report have been altered to protect the identities and ensure the security of individuals involved.



*Do you feel trapped or coerced to work due to debt?*

**Out of 185 responses**

**96.8% said Yes**

**3.2% % said No**

## Wages

Within the brick kiln system, workers are divided into categories to perform specialized tasks. A munshi is installed to maintain strict control, while a jamadaar recruits desperate labourers through advance loans that bind them to the kiln. The table below outlines the main categories of workers, followed by an explanation of how wage structures differ across roles. Yet, regardless of

### Categories of Brick Kiln Workers (BKWs)

1.	Jamadaar (collector)	He is the middleman who arranges labour for the owner
2.	Munshis (managers)	They oversee the workforce, manage production quotas, salary and debt book keeping.
3.	Patheras (Moulders)	They are the main brick makers as their work involves excavating the clay, making the mixture and moulding lumps of clay into bricks. Most are women and children.
4.	Jalaiwalas (Firing Men)	Those who are supposed to feed coal into the furnace. This is the toughest job, especially in Summers.
5.	Nikasiwalas	They remove the bricks from the kiln once they are baked.
6.	Bharaiwalas (Stackers and Transporters)	They are responsible for transporting the unbaked bricks on donkeys to the kiln.

their position, all workers are subjected to the same underlying reality—systematic wage exploitation.

Both the timing and the amount of wages paid to brick kiln workers vary depending on the nature of the task. Certain roles, such as the Jalaiwalas and Nikasiwalas, receive fixed monthly payments. In contrast, Patheras, who make up the majority of the brick kiln force, are paid on a weekly basis. Their wages are determined by the number of bricks molded, creating constant pressure to maximize output. Since payment is calculated on the total production, workers are compelled to involve their spouses and children in order to meet targets.

This system draws children into arduous labour at the cost of their education and childhood. For instance, Irfan, unable to survive on his own income, had no choice but to engage his wife and two young children, aged 14 and 11, in daily brick-making. Together, the family molds and stacks 1,500 to 2,000 bricks each day—an exhausting routine born not of choice, but of necessity. Such a structure entrenches families in cycles of exploitation, perpetuating poverty and stripping



children of the opportunity for a better future.

Furthermore, ICIMOD data collected across 440 kilns in 2020 highlights the significant wage deficits faced by workers.<sup>9</sup> These deficits reveal a consistent pattern of earnings falling well below the legal minimum wage, leaving families trapped in cycles of poverty and dependency. The table below provides a detailed breakdown.

Type of Work	Average Monthly Wage (PKR)	Legal Minimum (PKR)	Wage Deficit (PKR)
Patheras (work as family unit)	21,000	37,000	16,000
Jalaiwalas/Nikasiwalas	13,600 – 21,153	37,000	15,847 – 23,400
Bharaiwalas	18,052 – 26,756	37,000	10,244 – 18,948

Asma Bibi shared a similar account of wage deficit. Her family, involved in brick moulding, typically receives wages on a weekly basis—usually on Thursdays or Saturdays. Their total weekly earnings are PKR 9,000, but a mandatory deduction of PKR 2,000 is regularly taken out to repay an old debt. While Asma’s wage rose to a monthly PKR 28,000 from PKR 21,000 in 2025, it still falls short of the legal minimum wage. According to the recent notification by the Punjab government, the minimum wage has been set at PKR 40,000 per month for 26 working days, introduced as a measure to counter rising inflation.<sup>10</sup>

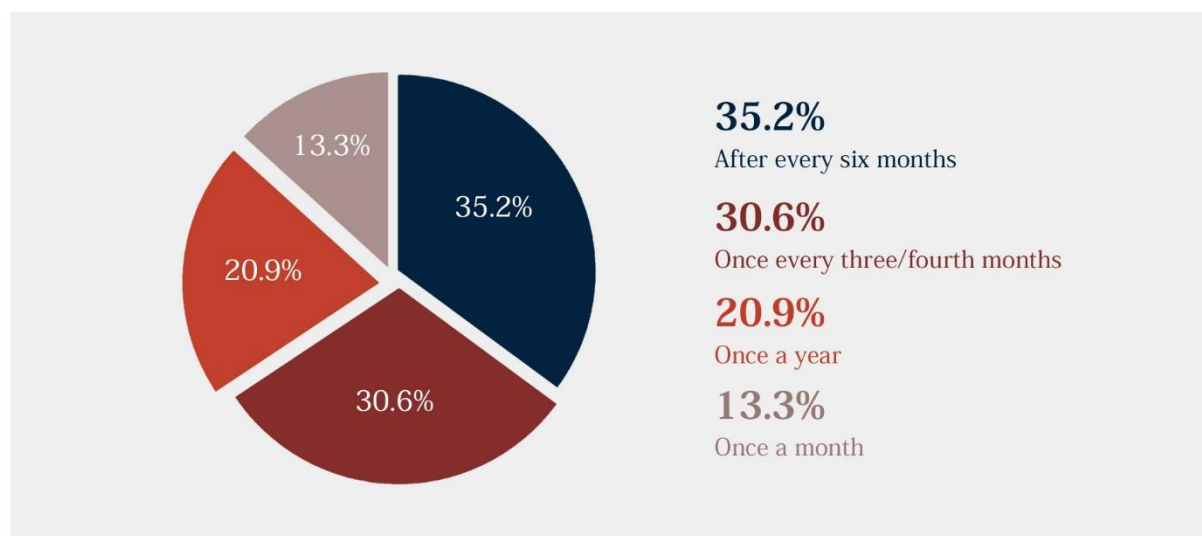
This meagre income of PKR 28,000 falls far short of covering basic needs, pushing families into a cycle of continuous borrowing to meet daily expenses. The Payment of Wages Act 1936 prohibits unauthorized deductions and bans all forms of advance payments or *peshgi*, yet it is rarely enforced in the brick kiln industry. The NCHR survey shows that 30.6% of workers take additional loans every three to four months, and another 35.2% every six months, because their wages cannot cover even basic needs.

9 Ghulam Muhammad Shah, “Towards an environment-and-worker- friendly brick kiln sector in Punjab, Pakistan,” *International Centre for Integrated Mountain Development (ICIMOD)*, pg 20-21, <https://lib.icimod.org/records/5hy92-nz379> (accessed 20 July)

10 Zahid Mehmood, “Notification on the draft recommendations regarding fixation of minimum rates of wages of unskilled adult and adolescent workers employed in industrial or commercial establishments in the Punjab province,” *The Punjab Gazette June 2025*, <https://labour.punjab.gov.pk/system/files/Draft%20notification%20Unskilled%20workers%20.pdf> (accessed 10 July)

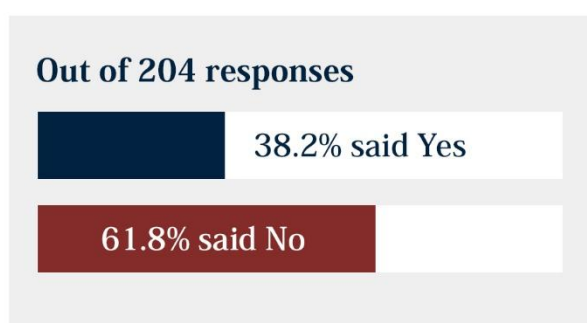


## *How Frequently do you take loans from your employer or supervisor?*



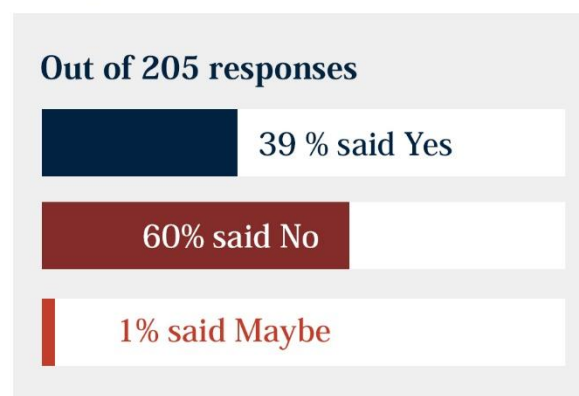
Unlike many other workers, Asma knows that the deductions from her wages are meant to repay her family's loan. According to the NCHR survey, 61.8% of brick kiln labourers are unaware that these deductions are loan repayments. With debt records controlled entirely by kiln owners and no transparency in bookkeeping, workers have little understanding of how much they owe or how long repayment will take, keeping them trapped in a cycle of vulnerability and exploitation.

*Have you repaid outstanding dues to your employer already?*



The problem is compounded by the fact that 60% of workers receive no documentation of their debt or repayments, leaving them unable to challenge inflated liabilities or seek a way out. Families live under constant pressure, uncertain of the total amount they owe and unable to plan for a future free from debt. Their labour is not only underpaid but also dehumanized, stripping them of any hope for financial freedom.

*Do you have any access (document or register) of keeping track of paying back your debt/loan?*





## Work Hours and Schedules

Brick kiln employers are legally obligated to comply with Chapter 4 of the Factories Act, which governs the working hours, rest periods, and weekly holidays of adult workers.

Despite these legal requirements, brick kiln workers are subjected to grueling schedules that regularly violate both the letter and spirit of the law. According to baseline survey data, the majority of workers report working between 8 to 16 hours per day. Alarming, only 7% of surveyed kilns adhered to an 8-hour workday. A staggering 93% demanded significantly longer hours, often with no weekly holidays, no paid leave, and no accommodation for personal emergencies or medical needs.<sup>11</sup>

These extended hours are not driven by choice, but by desperation. Workers are compelled to meet production quotas or earn marginally more in an already exploitative wage system. Sections 36 and 37 of the Factories Act explicitly state that no adult male worker in a seasonal factory may be employed for more than 10 hours a day, and that after 6 hours, an hour of rest must be provided. These rules are routinely ignored.<sup>12</sup> One worker recounted how the electricity in their quarters is deliberately cut off before dawn, a cruel tactic used to pressure families into beginning work early under the cover of darkness.

The experiences of brick kiln workers lay bare the profound human cost of bonded labour. Many workers have

workdays that begin as early as 3:00 AM and stretch continuously into the evening without any days off. There are no Sundays off—despite Section 35 of the Factories Act, which clearly states that no adult worker shall be required to work on a Sunday. In practice, kiln owners completely disregard this provision.

Sadia, a rescued bonded labourer, stated that families were closely monitored. Any attempt to step away for personal or medical reasons was met with threats or violence. Intimidation and surveillance kept workers under total control, turning the kiln into a prison-like environment. “We felt like we were being watched all the time,” Sadia recounted. “If we ever asked to leave, they would accuse us of planning to run away.”

Her story reflects the broader reality of brick kiln labour: not just long hours and underpayment, but an ostensible erosion of freedom, where rest is denied and escape is feared by the oppressors.

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<sup>11</sup> Ghulam Muhammad Shah, “Towards an environment-and-worker- friendly brick kiln sector in Punjab, Pakistan,” *International Centre for Integrated Mountain Development (ICIMOD)*, pg 20, <https://lib.icimod.org/records/5hy92-nz379> (accessed 20 July)

<sup>12</sup> “The Factories Act, 1934” <http://punjablaws.gov.pk/laws/168a.html> (accessed 25 June 2025)



## Employment Terms and Informal Labour Traps

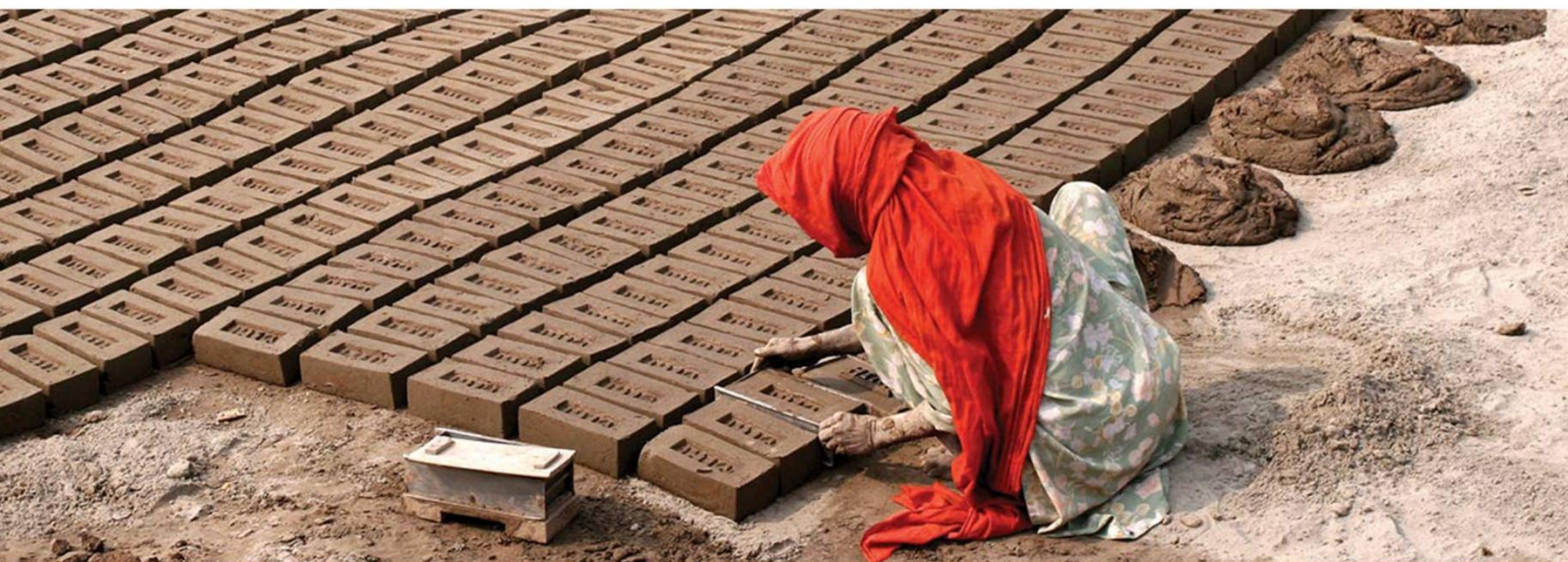
The survey for this study reveals a stark reality: 90% of brick kiln workers have no written employment contract. This is not a minor oversight but a deliberate practice that denies them even the most basic labour rights and protections. Without a contract, their employment is invisible—there is no legal record, no enforceable rights, and no way to challenge abuse.

The seasonal nature of brick production exacerbates this exploitation. Brick kiln workers are generally divided into two groups. The first are permanent workers who return to the same kiln each year. The second are transient workers who move between kilns or work only during production months. Faisalabad is the only surveyed district where all workers are considered permanent. However, as in Kasur, 90% of kilns across other districts employ a mix of both permanent and transient labourers. Owing to the transient nature of this workforce, employers often refuse to

provide contracts, depriving workers of any form of job security.

The absence of contracts has further far-reaching consequences. Without formal recognition, brick kiln workers cannot be registered with the Workers' Welfare Board (WWB) and are therefore excluded from critical benefits, including marriage grants, free education for their children, housing assistance, and death compensation for next of kin. Welfare Board schemes require workers to be employed in the same industry for at least three years, a condition incompatible with the migratory and insecure nature of brick kiln labour.

Similarly, informal employment status bars them from registering with the Employees' Old-Age Benefits Institution (EOBI), denying them pension entitlements and other old-age protections. This exclusion from both WWB and EOBI reveals a systemic gap in the enforcement of labour protections, leaving brick kiln workers invisible to labour oversight authorities and highly vulnerable to exploitation.



13 "A study of deficits in the fundamental principles and rights at work in the brick kiln supply chain," *International Labour Organization (ILO)* 2022, pg 21  
[https://researchrepository.ilo.org/view/pdfCoverPage?instCode=411ILO\\_INST&filePid=13100862450002676&download=true](https://researchrepository.ilo.org/view/pdfCoverPage?instCode=411ILO_INST&filePid=13100862450002676&download=true) (accessed 25 June 2025)



## Working Conditions:

The Factories Act of 1934 clearly mandates the provision of essential workplace amenities. Chapter 3 of the Act sets out detailed provisions on safety in industrial settings, including protective equipment, sanitary latrines and clean drinking water which are being severely neglected in the brick kilns.

The entire brick production process takes place in the open with no walls, shade or safeguards. This reflects a disregard for Provision 15 of the Act, which requires that ventilation and excessively high temperatures in workrooms be insulated or otherwise mitigated by effective means. This standard is entirely absent in brick kilns, where workers are exposed to the full brunt of Pakistan's extreme climate, facing bitter cold in the winters and unbearable heat waves in the summers. In severe heat, some workers have fainted from dehydration.

Furthermore, protective equipment in brick kilns is virtually non-existent. Workers are exposed to burns, extreme heat, smoke, and the risk of falling debris. Article 33-G of the Factories Act empowers the government to mandate protective gear such as goggles, masks, gloves, and safety shoes for hazardous work, yet it is rarely enforced, leaving all present at the kiln without the basic protections guaranteed under law. Compounding these challenges is the presence of infants and toddlers who often accompany their parents to work. They are seen playing or sleeping dangerously close to active kilns, surrounded by the same harsh and unsafe conditions that define the work environment.

Even the most basic workplace amenities mandated by law are routinely withheld. Provision 20 requires a sufficient supply of wholesome drinking water for all workers, while Provision 21 stipulates that enclosed and separate latrines and urinals must be provided for male and female workers. Employers often justify the absence of such facilities at the worksite by pointing to worker accommodations nearby, forcing labourers to rely on overcrowded and inadequate facilities in their residential quarters.









## Living Conditions

Data from the 2023 NCHR report shows that around 80% of brick kiln labourers are forced to live near the kilns due to severe financial constraints. A follow-up survey conducted by the NCHR in 2025 found that little had changed, with 76.2% still residing in close proximity to the kilns.

Every respondent expressed deep anguish over their living conditions, describing a daily struggle to survive without essential utilities, which turns their homes into places of suffering rather than shelter. Moreover, neither the Bonded Labour System Abolition Act (BLSAA) nor the Punjab Amendment Act of 2018 explicitly addresses the critical issue of living conditions, despite most brick kiln workers relying on housing provided by their employers.

Most workers' quarters are situated alarmingly close to the brick kiln chimneys, often within 20 feet, which allows managers to neglect their responsibilities in maintaining proper facilities at the worksite. These settlements typically consist of about 30 rooms arranged in a linear row, each fronted by a narrow open space. The structures are crude and fragile, built from clay, straw, tin sheets, and loosely stacked bricks without mortar or insulation, making them structurally unsound and wholly unfit for habitation. Each room, only a few square metres in size, is shared by an entire family of five to six people who

must cook, eat, and sleep in the same confined space. Over 71% of surveyed families reported such overcrowding.<sup>14</sup>

The lack of ventilation and insulation turns these shelters into ovens during the scorching summer and leaves them cold, damp, and unstable during the monsoon rains. Nearly two-thirds of workers reported intense physical suffering from prolonged exposure to extreme weather, with no comfort, safety, or reliable protection.<sup>15</sup> In a region prone to environmental hazards, these conditions are not simply inadequate but life-threatening. Entire families, particularly the elderly and young children, remain exposed to heat waves, flooding, and disease, with no safe refuge from the elements.

Sanitation facilities at brick kiln sites are in a state of utter disrepair. The few bathrooms that exist are located outside the makeshift row of rooms and must be shared by both the workforce and the residential occupants of the entire brick kiln community.

Saima Anees, a kiln worker, described the grim reality: "There are only three to four washrooms near the brick kiln used by nearly 200 workers. When they're occupied, we women are left with no choice but to use nearby fields."

Most of the bathroom door locks are broken and this leaves women in particular without safety. With no security, women often bathe at night when their family members can guard the door and most people are asleep.

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<sup>14</sup> Cambrie ball, "The Harmful Effects of Living in Brick Kiln Communities in the South Asia Region," *Ballard Brief* 2024, <https://ballardbrief.byu.edu/issue-briefs/the-harmful-effects-of-living-in-brick-kiln-communities-in-the-south-asia-region> (accessed 20th July 2025)

<sup>15</sup> *ibid*



The latrines are frequently clogged and overflowing, the walls stained with filth, and the stench overpowering. Sinks are often broken, and taps rarely function. This lack of sanitation deprives workers of even the most basic standards of hygiene.

Perhaps the most alarming gap is in water provision. Despite claims by some kiln owners of providing filtered or tube-well water, most workers rely on a single tap that serves both worksite and residential needs, often during peak hours. This water is frequently drawn from open or shallow wells without filtration, making it visibly unsafe. With no structured piping system, cross-contamination between drinking water and wastewater is common, causing widespread waterborne diseases.

As one worker described, “There is no clean water... we are forced to drink from broken taps... our children are constantly falling sick.”

Women and children, with their lower immunity and limited access to medical care, are the hardest hit.

Alongside the water crisis, the absence of a garbage disposal system poses serious dangers. Waste from daily life — including food scraps, plastics, and human waste, is dumped just outside the living quarters, attracting snakes, jackals, and rodents. This endangers residents, especially children who play nearby, and fills the air with the stench of rotting waste, creating an unhealthy and degrading environment.





Kiln owners routinely prioritise profit over people, exploiting legal loopholes and relying on government inaction. Rather than adopting the provisions of the ILO Workers' Housing Recommendation 1961 (No. 115), which Pakistan has yet to ratify, the sector continues to operate in a legal vacuum. The Factories Act offers no real protection and functions as a document of empty promises. Neither the Bonded Labour System Abolition Act (BLSAA) nor the Punjab Amendment Act of 2018 addresses the appalling realities of workers' living and working conditions.

The human toll of this neglect is stark. One elderly worker, with tears streaming down his face, voiced a sentiment shared by many:

“I’m growing old... I can’t live or work in these conditions. There is no secure future for my kids.”

His words echo a collective grief, reflecting lives spent in struggle and futures shaped by hopelessness.









## Chapter 4

# Forms And Prevalence of Violence And Harassment

Violence is not an exception but rather the dominant norm within the brick kiln sector. In the absence of effective regulatory oversight, abuse has become institutionalised as a method of discipline, rather than acknowledged as a violation of fundamental human rights. Workers routinely face verbal intimidation, physical assaults, and severe emotional abuse, which manifests through calculated tactics such as humiliation, forced isolation from support networks, persistent threats, and psychological manipulation. These actions are not accidental but constitute deliberate, recurring strategies specifically designed to break workers' spirits and enforce compliance.

"The irony," remarks Farooq Tariq, General Secretary of the Awami Workers Party, "is that brick kilns have officially been recognized as an industry, representing one of Pakistan's largest workforces—yet these workers remain among the most oppressed and vulnerable<sup>16</sup>."

At an international level, the International Labour Organization's Convention No. 190 and Recommendation No. 206 provide a

groundbreaking international definition of violence and harassment in the world of work. According to Article 1(1)(a), violence and harassment encompass a

*"range of unacceptable behaviors and practices, or threats thereof, whether occurring once or repeatedly, that aim at, result in, or are likely to result in physical, psychological, sexual, or economic harm and include gender-based violence and harassment."*<sup>17</sup>

These comprehensive standards provide a unified international framework aimed at preventing, addressing, and eradicating workplace violence and harassment globally. Pakistan's ongoing reluctance to ratify these essential instruments continues to leave brick kiln workers without adequate protection, deepening their invisibility and vulnerability within the existing legal landscape. Although, Pakistan has introduced the Protection Against Harassment of Women at the Workplace Act (PAHWW), its effectiveness remains limited due to its narrow, gender-specific scope, highlighting the need for broader legal safeguards that encompass all brick kiln workers.

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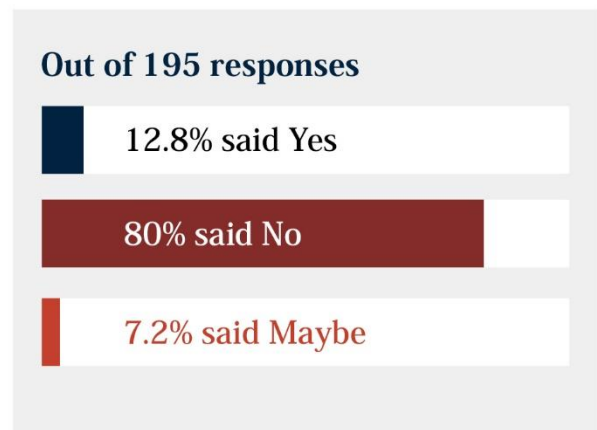
<sup>16</sup> Saadia Salahuddin, "Violence Builds Up," *The News on Sunday*, 16.09.2014, <https://www.thenews.com.pk/tns/detail/557473-violence-against-brick-kiln-workers> (accessed 8 July 2025)

<sup>17</sup> "Convention No. 190 and Recommendation No. 206 at a glance," *ILO 2019*, [https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.ilo.org/media/7476/download&ved=2ahUKEwjOwbDmu-WOAxUYVKQEHT\\_uNfgQFnoECAkQAQ&usg=AOvVaw1emFaPG-5lnRqi0jbl0f8C](https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.ilo.org/media/7476/download&ved=2ahUKEwjOwbDmu-WOAxUYVKQEHT_uNfgQFnoECAkQAQ&usg=AOvVaw1emFaPG-5lnRqi0jbl0f8C) (accessed 8 July 2025)

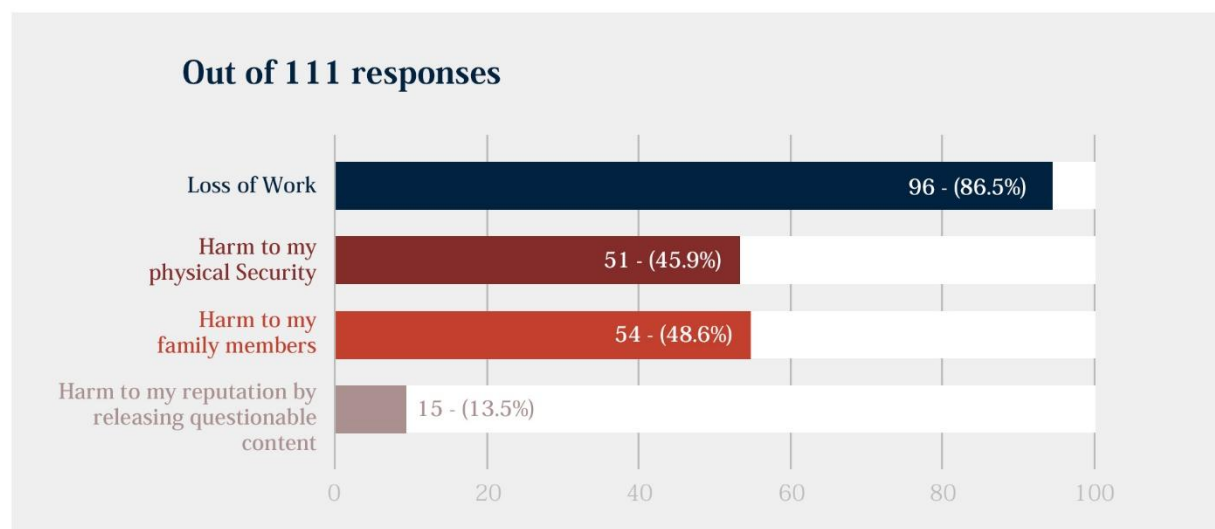


Emphasizing this point further, a recent NCHR survey of 200 brick kiln workers in Punjab revealed alarming findings: 80% of victims fully recognize the injustices perpetrated against them yet feel compelled into silence. The overwhelming majority (86.5%) fear losing their sole source of income, while nearly half (48.6%) live under constant intimidation from threats against their families. This stark reality illustrates how economic dependency and psychological coercion intersect, reinforcing a culture of silence and submission within Pakistan's brick kiln sector.

*Do you think it is appropriate for anyone at the Brick Kiln from among managers, workers and owners to be aggressive with you?*



*Either you were explicitly told to stay silent or not, what kind of implied or stated consequences did you feel could follow? (choose multiple, if they apply)*



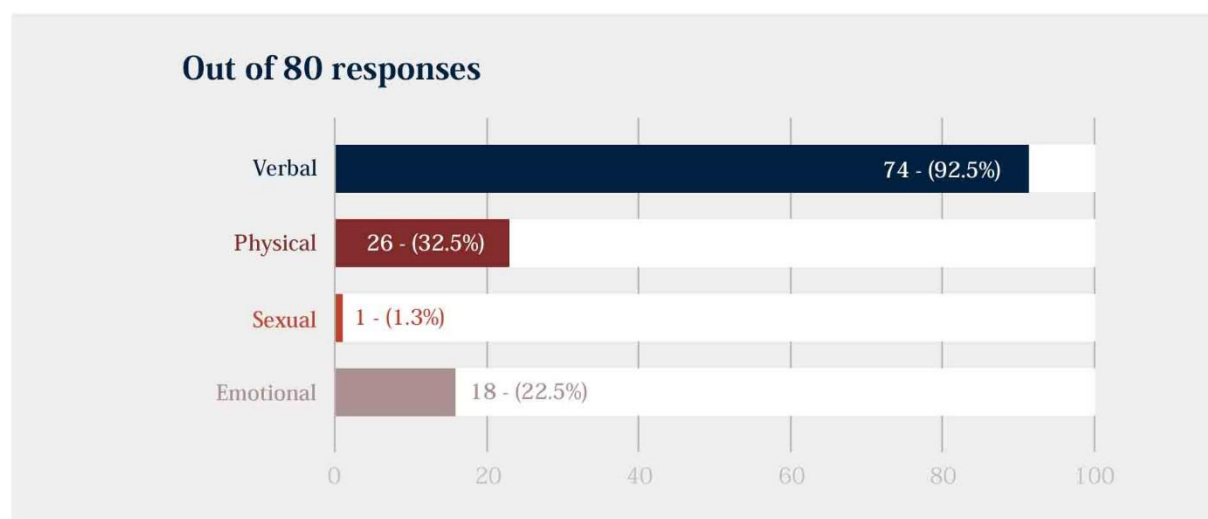
## Verbal Abuse:

Verbal abuse is rampant within the brick kiln sector, strategically weaponized as a primary tool to control, intimidate, and silence workers. During the survey, although only a third of workers felt courageous enough to respond, an overwhelming 92.5% confirmed the widespread prevalence of verbal abuse. This abuse is not confined to the workplace alone; it invades the private

spaces and homes of laborers, permeating every aspect of their lives. Workers reported routinely experiencing insults, shouting, and public degradation simply for requesting basic human necessities such as medical attention or time off when sick. Such requests were perceived as acts of defiance rather than legitimate needs. Additional examples of verbal abuse include derogatory name-calling targeting workers' ethnicity, caste, or gender.



## *If yes, what type(s) of abuse did you experience?*



In many instances, kiln owners and supervisors (munshis) escalate their aggression by intruding into workers' homes unannounced, often late at night. The homes themselves—frequently fragile, unsecured structures—provide no protection or privacy.

### **Physical Abuse:**

Verbal abuse in brick kilns is often just the beginning—frequently escalating into brutal physical violence meant to punish, silence, and dominate. Workers are routinely beaten for perceived disobedience, such as working too slowly, refusing extra shifts, or simply asserting their right to rest. This violence is not limited to slaps or beatings—it often involves tools like sticks, rods, and in extreme cases, even axes.

The story of 58-year-old Shahmir and his wife Sumbal, who have labored at the kilns for nearly four decades, is a haunting example of how deeply entrenched this cruelty is. Despite years of service, Shahmir was shown no dignity or mercy. One rainy season, when the ground had turned

dangerously muddy and slippery, Shahmir respectfully declined to work due to his age and frail health. His refusal was met not with understanding, but with rage.

In a horrifying display of unchecked power, the manager and kiln owner dragged Shahmir from his home and began to beat him. When Sumbal tried to intervene, she too was struck. The violence spiraled out of control—the manager took an axe and struck Shahmir's head. He collapsed, bleeding profusely, as bystanders remained silent out of fear. Only his son dared to help, rushing him to the hospital. The owner never looked back, never checked if Shahmir was alive, never offered aid or covered medical costs.





No justice was served. The matter was swept under the rug through a forced “sulah” (settlement) arranged by the local community—typical in an environment where victims are expected to forgive and forget while perpetrators walk free.

This is not an isolated incident; it reflects a culture where violence is normalized, expected, and used as a governing mechanism.

Ironically, a family of brick kiln workers is referred to as ‘khata’ (register) by kiln owners. It reinforces a vicious system where workers are treated not as human beings, but as disposable tools to be controlled through pain and power.

### **Abduction and Torture:**

In brick kiln communities, even the basic right to rest is criminalized. Workers who fall ill, need time off, or show signs of resistance are often met with terrifying forms of retribution. Abduction and physical torture are used as calculated tools to intimidate not just the individual worker but the entire family—sending a chilling message to others who may consider asserting their rights.

In one such case, Yasir, a bonded kiln worker suffering from chronic joint pain, was unable to sustain long hours of physical labor. When his health worsened, he was forced to leave work early. This minor act of taking rest due to illness was enough to trigger a brutal chain of events. Later that night, around 10 p.m., a group of men affiliated with the kiln entered Yasir’s home. Like many brick kiln quarters, the house had no lockable door or basic security—leaving the family completely exposed.

The men began by threatening Yasir’s children, who cried in fear as their home was invaded. They accused Yasir of defaulting on his loan because of his absence from work. When the family couldn’t offer immediate repayment given their financial condition, the men abducted Yasir in front of his wife and children. Fauzia Bibi, his wife, tried to resist, but was violently shoved into the wall, sustaining injuries.

What followed was five days of inhuman treatment. Yasir was kept in captivity, tied up, deprived of food and sleep, and repeatedly beaten—a violent reminder that rest or refusal to work was not a right he was allowed. His captors insisted that unless the debt was paid off, he would be treated like property, not a person.

On the fifth day, Yasir was dumped outside his home, severely bruised and in even worse physical condition than before. His backaches and joint pains, already debilitating, had intensified. Fortunately, Yasir’s wife was approached by a pastor who frequently visited the brick kilns, where most workers belong to Pakistan’s Christian minority, comprising just 1.37% of the country’s population. He informed her about an organization dedicated to rescuing bonded labourers. Through timely intervention, Yasir and his family were successfully freed from bondage and provided with a taxi, enabling them to begin a new chapter of independence and dignity.



## Emotional Abuse:

Emotional abuse within brick kilns is a subtle yet profoundly damaging form of violence that systematically undermines workers' psychological wellbeing and sense of self-worth. Persistent threats of withholding or cutting salaries if workers fail to meet demanding brick-production quotas serve as a powerful means of emotional abuse. Workers, already economically vulnerable, are compelled to push themselves beyond their physical and mental limits out of constant fear of financial penalties. This persistent anxiety creates an environment of chronic stress and insecurity, leaving workers in a perpetual state of apprehension about their livelihood and survival.

Moreover, psychological manipulation further compounds this abuse. Kiln owners and managers frequently exploit workers' desperation, reinforcing feelings of inadequacy and dependence by repeatedly reminding them of their debts, their replaceability, and their lack of alternatives. By systematically undermining workers' self-esteem and sense of agency, perpetrators ensure submission, silence any dissent, and prevent collective action or resistance..

Another insidious form of emotional abuse prevalent at brick kilns involves employers deliberately restricting workers' freedom of movement and limiting their communication with family members or contacts outside the kiln environment. Driven by fears that workers might attempt to escape or abandon their debts, employers closely monitor and control external interactions. Consequently, there exists no genuine relationship of trust between

workers and employers. This enforced isolation, though often unspoken, systematically weakens social bonds, depriving workers of crucial emotional support and practical assistance.

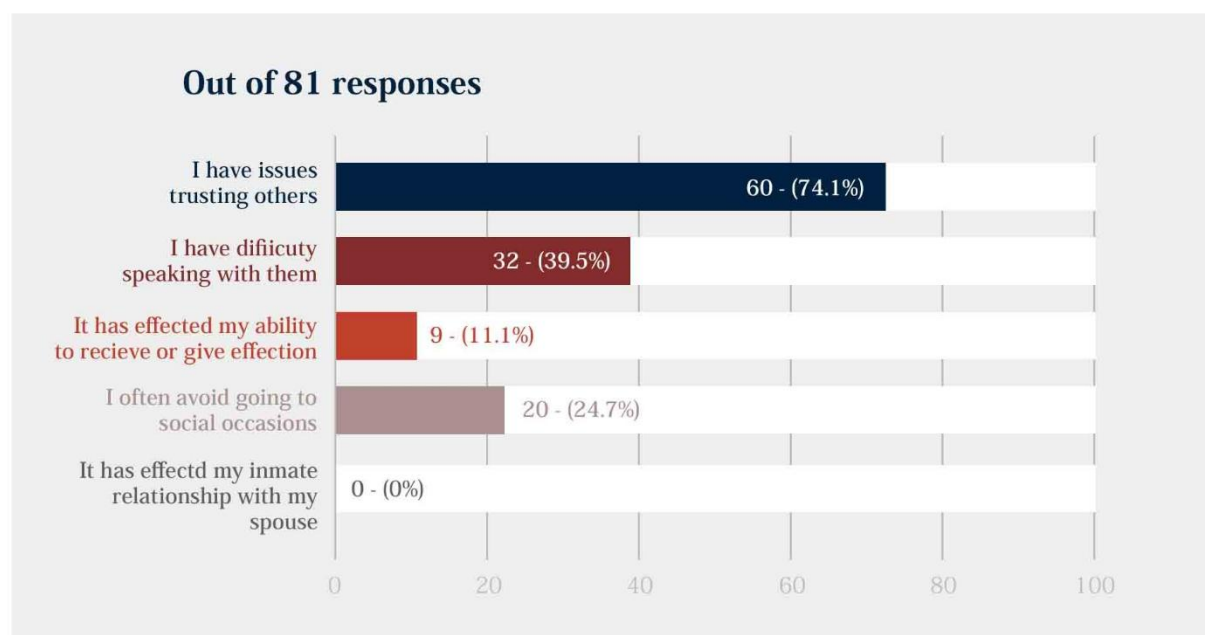
Workers further report considerable difficulty discussing workplace harassment or conditions with outsiders, who may not fully comprehend their plight. According to the NCHR survey, 74.1% of brick kiln workers expressed deep concerns regarding trusting others, fearing betrayal or the reporting of their grievances back to their employers, perpetuating their silence and isolation.



*“Emotional abuse within brick kilns is not always visible, but it systematically erodes workers’ self-worth, creating an environment of chronic stress and fear.”*



*If yes, how has it impact your relationship with the family, or community members?*



Razia, a mother of three, has worked alongside her husband at a brick kiln for over a decade. Life at the kiln is defined not just by exhausting physical labour but by relentless emotional torment. Every morning, the kiln manager greets her family with verbal insults and degrading remarks, publicly humiliating Razia and her husband for their perceived slowness or inadequacy, especially if their daily brick-making quota is not met.

Her movements outside the kiln area are strictly controlled. Visits to her relatives, even in emergencies, are permitted only after prolonged pleading and are accompanied by threats and warnings.

The emotional toll is immense. Razia's self-worth has slowly diminished, replaced by constant anxiety and dread. She feels trapped—not only physically by the debt her family owes, but emotionally, in a world where humiliation is the norm and safety or comfort feels impossible. When interviewed by researchers from the

NCHR, Razia quietly expressed that the worst abuse isn't the hard labour itself, but rather the daily emotional humiliation, isolation, and psychological torment that have left deep invisible scars, making even the simple act of speaking up or seeking help seem frightening and dangerous.

### **Extreme Cases: Deaths and Fatal Beatings**

While verbal abuse, physical punishment, and emotional harassment are tragically common at brick kilns, some cases cross the line into unthinkable brutality—including murder. These are not mere accidents or isolated misjudgments; they are the most horrifying outcomes of a system that relies on violence to maintain control.

One such devastating case is that of Sarah, a mother who worked at a brick kiln alongside her children. Her 16-year-old son, also a worker at the





kiln, was ordered by the owner to carry out an additional labor task. When the boy refused, the situation escalated to a level of cruelty beyond comprehension. The kiln owner and his men captured the child, brutally murdered him by piercing his neck with a spear, and later sent the lifeless body back to the family.

Thankfully, after this horrifying ordeal, an NGO intervened, recovered the family, and cleared their debt. However, no justice was served against the perpetrators, who remain free and unaccountable—protected by the lawlessness that prevails around these kilns. It illustrates the deadly consequences of unchecked power in an unregulated labor system.

Fear replaces law; intimidation replaces dignity. In this coercive environment, entire families—men, women, and children alike—are trapped in cycles of silence, where speaking out risks severe retribution and requesting rest invites punishment. The normalization of abuse does not merely suppress resistance; it institutionalizes modern-day slavery, systematically stripping workers of their rights, voices, and humanity under the

guise of labor. Workers have come to accept abusive behavior from managers and owners as inevitable due to their profound financial dependency, a harsh reality clearly reflected in the graph figure below.

*Do you think your financial dependence, or debts offer a strong leverage to your perpetrators of abuse to engage in abusive behaviors?*

**Out of 194 responses**

**65.5% said Yes**

**19.6% said No**

**14.9% said Maybe**







## Chapter 5

# Gender Based Violence And Exploitation

In the deeply patriarchal and exploitative environment of Pakistan's brick kilns, gender-based violence remains widespread. The intersecting marginalisation of being a woman, from a religious minority, and economically dependent renders women the most vulnerable targets within this system. Once a male family member accepts a loan under the peshgi (advance payment) system, women and children are often treated as collateral, bound into forced labour to guarantee repayment. Their consent is neither asked nor assumed—they inherit debt, not protection.

While bearing the dual burden of household responsibilities and the grueling physical demands of brick-making, women in brick kilns are subjected to an even more insidious layer of exploitation. This chapter examines the various forms of violence they endure, including workplace harassment, sexual violence, forced marriages, and abductions. The pervasive culture of control and fear within brick kilns exposes women to relentless gender-based violence, leaving them vulnerable at every stage of their lives.

The Protection Against Harassment of Women at the Workplace Act, 2012—a pivotal federal statute—explicitly prohibits harassment, abuse, and intimidation within work environments. Complementing this, the Punjab

Protection Against Harassment of Women at the Workplace (Amendment) Act, 2022, reinforces these protections at the provincial level.

Both laws clearly define:

*“Harassment to include unwelcome sexual advances, requests for sexual favors, verbal or written communication, physical conduct of a sexual nature, sexually demeaning attitudes that disrupt work performance or foster an intimidating, hostile, or offensive work environment, as well as retaliation for refusal to comply or making compliance a condition of employment.”*

In practice, women at the brick kilns experience every form of abuse encompassed within the definition of harassment. Although the brick kiln community is well aware of these abuses and strongly disapproves, most remain silent for fear of losing their livelihoods. NCHR survey data shows that 87.9% of workers consider managers' behavior toward women and children inappropriate, yet their silence allows the persistent surveillance, threats, and violence against women to continue unchecked.



*Do you think it is appropriate for the Brick Kiln owners or managers to speak by using abusive language with women and children?*

Out of 199 responses

4.1% said Yes

87.9% said No

8% said Maybe

Another survey conducted across 324 brick kilns in eight districts of Punjab highlights significant reluctance among workers, especially women, to report sexual harassment, particularly in the presence of male counterparts. Despite this hesitation, as many as 23.64% of respondents acknowledged experiencing sexual harassment at their workplaces though only 1.5% are formally reported.<sup>18</sup> The sharp disparity between the high incidence of harassment and the low rate of formal reporting underscores the systemic underreporting driven by workers' loss of faith in both the law and its enforcers.

### Harassment at Work Place:

At brick kilns, harassment often begins with deliberate acts of humiliation, used to break women's confidence and assert control. Women are pressured into working long, punishing hours, and any resistance—whether due to illness, exhaustion, or family responsibilities—is met with hostility. The *munshis* routinely engage in verbal abuse, public

shaming, and even inappropriate touching to assert dominance. In many cases, women's scarves or dupattas are forcibly removed—a direct violation of their religious and cultural dignity. This deliberate degradation leaves women feeling ashamed, vulnerable, and powerless.

Farzana Bibi's ordeal illustrates how gender-based violence is woven into the fabric of the brick kiln system, and how, despite such cruelty, women find ways to endure.

Farzana's husband had taken a loan from a brick kiln owner, only to abandon his wife, five children, and elderly parents, leaving them to bear the burden of his debt. Without consent or choice, Farzana was forced into bonded labor, working in his place to repay the amount. At seven months pregnant, she was made to work 12-hour days in harsh conditions, while her two eldest children—still minors—were also compelled to work, in clear violation of child labor laws.



<sup>18</sup> Mudassir Rizvi, "Bricked by Bricks: Plight of Brick kiln Workers," *Pattan Development Organization*, 2015 [https://pattan.org/v2/data\\_files/Bricks\\_Report\\_final.pdf](https://pattan.org/v2/data_files/Bricks_Report_final.pdf) (accessed 18 July 2025)



The pressure was relentless. The munshi regularly cursed and shouted at Farzana's children, exploiting them as leverage to compel greater productivity. When Farzana fell ill or was unable to work, the munshi resorted to threats, verbal abuse, and humiliation, going so far as forcibly removing the scarf from her head—a calculated act intended to crush her dignity and reinforce submission.

According to the PAHWW (Amendment) Act, 2022, such severe acts of physical and psychological violence constitute a clear violation and must be reported to an inquiry committee. However, the committee's composition mandated the inclusion of the employer or manager, a requirement that compromises its impartiality and reinforces workers' fear of retaliation. Alternatively, complaints may be filed with the Ombudsman, yet this avenue too has proven inadequate due to lack of knowledge on redress systems and institutional complacency.

Farzana's attempt to leave was met with intimidation and coercion. Yet, with the help of a church member, an NGO intervened and paid off her debt and she and her children were rescued. Today, she runs a small grocery store, a modest but powerful symbol of her resilience and determination to rebuild her life.

Still, the psychological trauma, cultural violation, and scars of public humiliation remain—not just for Farzana, but for countless women like her whose stories remain untold.

## **Spatial Vulnerability and Sexual Harrassment**

The physical environment of brick kiln settlements is a silent enabler of violence—an architectural embodiment of neglect and systemic vulnerability. Under the PAHWW Act 2022, the term 'workplace' is defined broadly to include any premises or geographical area where an organization or employer operates. This encompasses not only buildings and factories, but also open areas and any location connected to official activities outside traditional office settings. By this definition, the entire vicinity of a brick kiln—including its production areas, administrative spaces, and worker housing—clearly qualifies as a workplace. Therefore, any act of harassment, abuse, or violence occurring within this space falls under the scope of the Act and should be prosecuted accordingly.

The reality, however, is that the living quarters in brick kiln settlements often lack secure doors, gates, or boundary walls, leaving families exposed to unchecked intrusion by outsiders, co-workers, and those in positions of authority. This absence of physical security not only facilitates violations but also makes women and children particularly vulnerable to harassment.

This lack of spatial protection was weaponized in the case of Atiya. Atiya's family had spent over three decades working at various brick kilns, living in fragile dwellings clustered just steps apart from their neighbours—barely ten paces separated one home from another. These crude structures lacked even basic security measures; there were no doors or locks, only flimsy curtains or hanging sheets that offered no real



protection or privacy.

Shortly after Atiya and her family relocated to a new kiln community, she became uncomfortably aware of a neighbour who persistently watched her movements. The proximity of their homes—mere steps apart and completely unsecured—made it easy for the neighbour to closely monitor her daily routine without arousing suspicion. This closeness, meant to foster a sense of community, instead became a threat, as it allowed the neighbour constant, unrestricted surveillance of Atiya.

One evening, this proximity escalated from a source of discomfort to outright danger. Atiya was returning home from work earlier than her family to prepare their evening meal when the neighbour, accompanied by several other men, took advantage of the situation. Exploiting the fact that she was alone, they violently grabbed her, attempting to forcefully drag her towards his nearby house, which stood only a few steps away from her own. In the ensuing struggle, Atiya desperately resisted, screaming for help until her attackers covered her mouth and brutally broke one of her fingers to silence her.

Fortunately, her young cousins, who were returning from the kiln at that very moment, witnessed the assault. Their immediate cries for help drew the attention of other neighbours, including Atiya's father, who intervened just in time to prevent further harm. Atiya's traumatic experience illustrates how the extreme proximity of houses, combined with a complete absence of basic

security measures, creates a dangerous environment within brick kiln settlements. Such spatial vulnerability leaves workers, particularly women, constantly exposed—not only to external threats but tragically, even from those living mere steps away.

Razia Imran's story also paints a devastating picture of how unguarded child spaces in kiln communities expose children to sexual violence. Kasur is already infamously known for child sexual abuse, following a major scandal from 2006 to 2014 in which 280-300 children were victims of sexual abuse.<sup>19</sup> Given this troubling historical context, brick kilns in Kasur are particularly susceptible, underscoring the critical need for employers to implement stringent security measures.

Razia's seven-year-old daughter, Iman, became a victim precisely because the brick kiln settlement housing lacked basic security measures. Razia and her husband, Imran, along with their eldest child, were compelled to work longer hours at the kiln, desperately trying to repay a ballooning debt accrued from pregnancy-related medical expenses and family marriage obligations. Every morning at dawn, around 5 am, both parents left their three younger children, all under ten years old, alone in their modest home—an insecure dwelling without locks or any form of protective measures.

Iman, the third among her siblings, was just seven—a playful, innocent child who still loved toys and candies. Tragically, her innocence was exploited by a 16-year-old local shepherd who had

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19 Zehra Abid, "In Pakistan's Kasur, child rapes and killings continue unabated," *Al Jazeera News*, 28 October 2019, <https://www.aljazeera.com/features/2019/10/28/in-pakistans-kasur-child-rapes-and-killings-continue-unabated> (accessed 8 June 2025)



noticed the family's vulnerability. Observing that no adult watched over Iman and her siblings, he deceptively lured the trusting young girl away from her home by promising to buy her candy. Iman, unaware of the danger and craving a simple moment of joy, followed him, becoming yet another innocent victim of the kiln community's systemic neglect and lack of safety.

When Razia returned home from the kiln she immediately noticed Iman was missing. Panic surged through her, knowing the open, unsecured nature of their residence left her children exposed and vulnerable. Moments later, she found Iman near the fields, desperately struggling on the ground as the boy forced himself upon her. Razia rushed forward, pushing him away fiercely, and gathered her trembling child into her arms. Iman was shaking uncontrollably, tears streaming down her frightened face, her innocence shattered in a moment that would haunt them both forever.

Despite Razia's immediate response—filing an FIR and handing the perpetrator over to authorities—justice was obstructed by the perpetrator's familial connections with local law enforcement. The boy's father, a police official himself, ensured charges were not pursued. Additionally, the kiln owner's acquaintance with the boy further highlights how these spaces operate as protected zones for perpetrators rather than victims.

These stories illuminate how physical insecurity is directly linked to gender-based violence in brick kiln communities. When workers live in unsecured, surveillance-heavy but protection-light environments, their

vulnerability increases dramatically. Women are easily isolated, monitored, or abducted; children are left unattended and at risk. The design and governance of kiln housing—intended to control labour—also strip individuals of privacy, protection, and autonomy.





## Managers and Owners as Accomplices to harassment

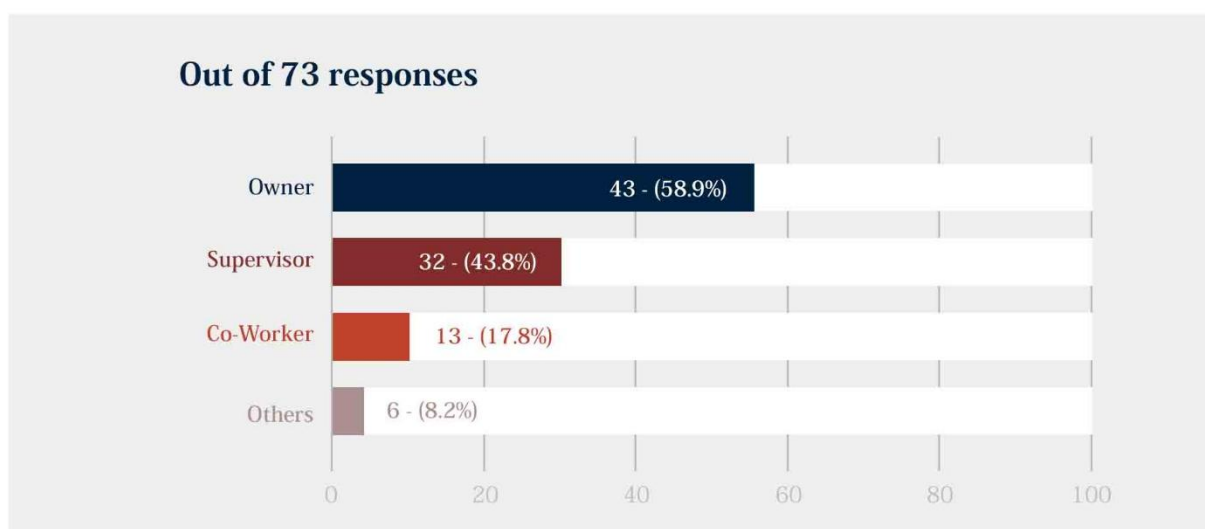
One of the most pervasive causes of harassment within brick kiln communities is the unchecked authority wielded by managers and owners. Rather than viewing female workers as individuals entitled to respect and protection, these employers often treat laborers as mere subordinates susceptible to exploitation. Ironically, Provision 11 of the Protection Against Harassment of Women at the Workplace (PAHWW) Act, 2022, explicitly mandates employers to implement policies safeguarding employees from harassment and to establish an Inquiry Committee dedicated to addressing such grievances. However, instead of fulfilling these legal and ethical responsibilities, many kiln owners abuse their positions of power—directly perpetrating acts of harassment against female workers or tacitly endorsing abuses committed by others.

This grim reality was clearly reflected in survey responses in which a striking

majority of 58.9% pointed directly to the kiln owners as the primary perpetrators of aggressive behavior, closely followed by munshis, who accounted for 43.8%. The culture of fear is evident in the fact that only one-third of the workers felt courageous enough to identify their aggressors. The results show a troubling pattern where those responsible for protecting workers instead become the main abusers, fostering a toxic culture of exploitation and silence.

This dynamic was tragically evident in the case of Maryam, a 22-year-old Christian woman interviewed in Faisalabad after her rescue from a kiln. Maryam had been working at the kiln with her family since childhood. Uneducated and economically dependent, she was an easy target for abuse. The perpetrator, she recounted, was the son of the kiln owner, who initially began harassing her from the rooftop of his nearby house. What started as verbal harassment quickly escalated to physical assaults, sometimes in the presence of other unidentified men.

### *Who were the main actors inflicting aggressive behavior (Physical or verbal) (if any)?*





The final assault occurred when she was home alone and the perpetrator, accompanied by others, forcibly entered her house and raped her.

Terrified by repeated threats against her father's life, Maryam remained silent. She eventually began suffering from trauma-induced illness, including loss of appetite and psychological distress. Unable to bear the suffering any longer, she confided in her father, brother, and sister-in-law. The family, immobilized by fear and shame, remained at the kiln for another month until a fellow worker introduced them to an NGO. With their help, the family's debt was cleared and they were relocated to safety.

Maryam later revealed that numerous other girls at the same brick kiln also experienced harassment and sexual violence—perpetrated either by the owners or their male co-workers. However, the pervasive climate of fear and the societal pressure to safeguard family honor compelled most victims to remain silent. In Maryam's situation, the abuse of authority took the form of explicit threats about her father's employment, fitting squarely within the definition of harassment under the Protection Against Harassment of Women at the Workplace Act, 2022

A similarly chilling account emerged from Kasur, where an 18-year-old girl named Masooma described her traumatic experience of abduction and suspected sexual assault. One of nine siblings, Masooma stayed home to care for her younger brothers and sisters while her father and older siblings worked at the brick kiln. The kiln's

worked at the brick kiln. The kiln's manager, or munshi, routinely entered their home uninvited, passing suggestive comments and asserting that she should be working like her family.

One afternoon, while fetching water, Masooma consumed a drink that had been laced with an unknown substance. She lost consciousness and was kidnapped while her father was away at work. When the family turned to the munshi for help, he dismissed their concerns, coldly stating that she must have run away. Masooma later regained consciousness in an unfamiliar location, partially undressed and disoriented. She had been gone for almost a week, kept in captivity, and fed minimally. With the intervention of police and civil society, she was eventually rescued.

Despite the circumstances and visible signs of trauma, her father refused to acknowledge the likelihood that she had been sexually assaulted. In an attempt to preserve the family's "honor" and avoid social disgrace, he arranged her marriage to a cousin—another worker in the brick kiln system—effectively silencing her experience and tethering her to the very structure that had failed to protect her. According to a report by the Human Rights Commission of Pakistan, around 35% of women workers at brick kilns are abused and harassed by their bosses.<sup>20</sup>

These accounts underscore how brick kiln managers and owners often act not as protectors, but as perpetrators or enablers of violence.

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<sup>20</sup> "About 35% women workers are harassed, tortured at brick kiln," *The Express Tribune*, 3 Nov 2019, <https://tribune.com.pk/story/2092859/35-women-workers-harassed-tortured-brick-kiln> (accessed 19 July 2025)



## Kidnap and Forced Marriages

Within the closed, hierarchical ecosystem of brick kilns, forced marriages function as a form of gender-based violence, serving as tools for labour retention and forced religious conversion. These so-called unions are rarely consensual. They are driven by economic subjugation, social invisibility, and patriarchal coercion. Within this framework, marriage becomes a mechanism of exploitation, stripping women and girls of their autonomy, safety, and any avenue for recourse.

The story of Samia Javair, a 35-year-old bonded labourer, exposes the depth of this abuse. After taking a loan of PKR 280,000 for her children's medical treatment, Samia and her husband were drawn into the kiln's exploitative system, where they worked for over a decade. Her gender, poverty, and bonded status made her increasingly vulnerable. Harassment began when male acquaintances of the kiln manager, who were frequent visitors, started making inappropriate and suggestive remarks. Their behavior created an environment of intimidation and discomfort. Rather than protect her, the manager exploited his control by deliberately altering work shifts, ensuring Samia and her husband were never on duty together.

One night, while her husband was away, three men forcibly entered Samia's residence, tied her hands, and abducted her at gunpoint. They took her to a remote location in Sahiwal, where she endured a horrifying sexual assault. In a shocking act of cruelty, the abuser's family—including his own mother—pressured Samia to abandon her faith and forcibly marry her assailant, completely disregarding the

fact that she was already married and a mother to young children. This relentless coercion underscored not only their complete disregard for her dignity and existing family bonds but also highlighted the disturbing practice of using forced marriage as a tool to legitimize sexual violence and silence victims. When Samia threatened suicide, the pressure subsided, but the psychological trauma had already taken root.



Her rescue in a police raid brought no closure. Upon returning, her own family disowned her, blaming her for the abuse. This double punishment, first at the hands of her abuser and then from her own community, underscores the complete lack of protection for women in bonded labour. It highlights the systemic failure to safeguard their rights and dignity. Kiln managers, in such environments, are not passive figures—they are planners and enablers



of gendered violence, exploiting structural silence to provide access to women for their associates or as a means of punishment.

Similarly, in the case of Naziya, a 13-year-old Christian girl, illustrates the intersections of minority identity, poverty, and institutional betrayal. Employed alongside her family at a brick kiln, Naziya was abducted by an adult male co-worker. Her father reported that the Station House Officer (SHO) accepted a bribe, fraudulently obtained the child's B-form, and altered her age from 13 to 19 to make her appear legally eligible for marriage.

This case exemplifies a systemic pattern of coerced or forced marriages within kiln communities, where such unions are often arranged to maintain a stable labour supply. Girls are married off to male co-workers or local men to bind families more tightly to the kiln, ensuring continuity of labor through both social control and intergenerational dependency.

Her father, uneducated, impoverished, and belonging to a religious minority, was threatened with death if he attempted to reclaim his daughter. Despite repeated appeals for justice, no legal protection or remedy was provided. According to Section 498-B of the Pakistan Penal Code (PPC), forcibly marrying a woman against her consent is punishable by imprisonment ranging from three to seven years and a fine of Rs. 500,000. Nevertheless, Naziya remains with her abductor, reportedly married against her will and forcibly converted, leaving her family in perpetual grief and fear.

These stories reveal that forced marriage is not an incidental byproduct of kiln life—it is a deliberately used mechanism of control. The combination of debt bondage, patriarchal authority, religious coercion, and the absence of legal safeguards turns marriage into a tool of entrapment, not protection.

## Culture of Silence

Countless horrific accounts of rape, sexual violence, and other forms of abuse within brick kiln communities remain hidden due to an entrenched culture of shame, stigma, and fear. Consequently, women and girls rarely know or have the courage to report these crimes, a reluctance compounded by practical challenges outlined in the Protection Against Harassment of Women at the Workplace (PAHWW) Act, 2022. The Act explicitly recognizes these evidentiary challenges, noting:

***“The harassment usually occurs between colleagues when they are alone, therefore usually it is difficult to produce evidence. It is strongly recommended that staff should report an offensive behavior immediately to someone they trust, even if they do not wish to make a formal complaint at the time. Although not reporting immediately shall not affect the merits of the case; and”***

Despite this encouragement to speak up promptly or confide in a trusted individual, the practical realities of lack of information and avenues of redress and fear of retaliation significantly deter victims from coming forward. This hesitation not only deepens their vulnerability but also perpetuates their silence, reinforcing a cycle of continued abuse and unaddressed trauma.

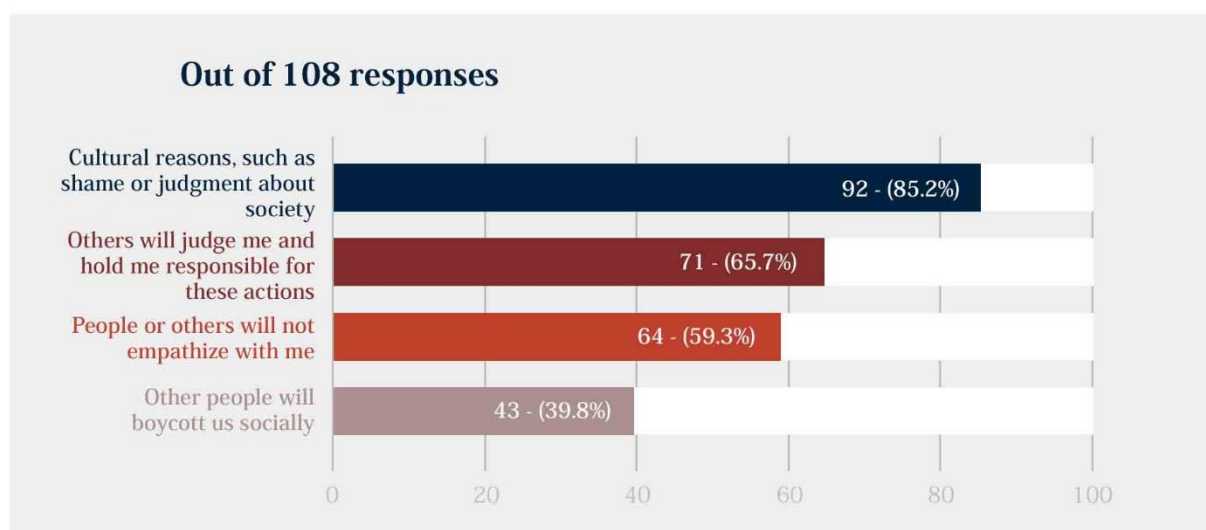


*Did you feel that your financial situations impacts your ability to report and resist abuse?*



The accompanying graph visualizes key factors preventing victims from reporting sexual violence and harassment in brick kilns. Clearly evident is the overwhelming influence of economic vulnerability, with financial dependence cited by 84.7% of respondents as a primary barrier to reporting abuse. Cultural shame emerged as the primary reason for victims' silence, reinforcing it as a survival strategy. Collectively, the data presented underscores how deeply entrenched social stigma perpetuates cycles of violence, effectively silencing victims within brick kiln communities.

*What reasons other than the financial may be keeping women and children from speaking out about abuse? (select all that apply)*









## Chapter 6

# Health Impacts

Health and safety is a fundamental human right, recognized under Article 12 (Right to Health) of the *International Covenant on Economic, Social and Cultural Rights (ICESCR)*. Despite this, bonded labourers at brick kilns in Pakistan continue to suffer from harsh and hazardous working conditions that have devastating impacts on their physical and mental well-being.

One of the major challenges in addressing these health impacts is the widespread lack of awareness among kiln workers regarding the risks associated with their work environment. Illiteracy, limited education, and poor access to information mean that most workers remain unaware of the long-term health consequences of their labor. As a result, they rarely seek to report health issues, which significantly hampers efforts to document and quantify the problem.

The importance of workplace safety is recognised globally in the International Labour Organization (ILO) Convention No. 155 (1981). Although Pakistan has not ratified this convention, it has enacted its own legal framework with the Occupational Health and Safety Act 2018. In line with this, the province of Punjab introduced the Occupational Safety and Health Act 2019, aimed at regulating and improving workplace conditions. Despite these legislative measures, brick kiln workers continue to

be deprived of even the most basic health protections.

This chapter explores the widespread physical and mental health issues faced by bonded brick kiln workers due to chronic exposure to extreme working conditions, combined with nutritional deficiencies, poor healthcare access, and psychological trauma. The aim is to provide a clearer understanding of how poor working conditions directly undermine the health rights of one of the country's most marginalized labour forces.

### Hazardous Working Conditions and Physical Health

Brick kiln workers routinely endure adverse working conditions that take a heavy toll on their physical health. Although Provision 3 of the OSH 2019 Act mandates that employers must take measures to control and prevent physical, chemical, biological, radiological, ergonomic, psychosocial, and other workplace hazards affecting employees and others, these protections are often not enforced. Among the most commonly reported health issues are pulmonary illnesses, musculoskeletal disorders (MSDs), and reproductive health problems among women.



## Pulmonary Illnesses

Daily work at brick kilns involves intense manual labor in environments saturated with smoke, dust, and extreme heat. Prolonged exposure to kiln emissions—containing carbon monoxide, sulfur compounds, heavy metals, and fine particulate matter—poses a serious threat to respiratory health. While all workers are exposed to these conditions, specific roles face differentiated risks: patheras, who work with raw materials, are more directly exposed to dust, while bharaiwalas, operating near the firing kilns, encounter heavier smoke concentrations. As a result, respiratory diseases such as chronic bronchitis, asthma, pulmonary fibrosis, and other lung-related disorders are common. Exposure to silica dust further compounds these risks, often resulting in silicosis—a debilitating and irreversible lung disease widely documented among kiln workers.<sup>21</sup>

A 2021 study conducted by the University of the Punjab in Kasur district highlighted a clear correlation between brick kiln contamination and impaired lung function. The study found that only 21.66% of workers exhibited normal pulmonary function, while a staggering 78.33% showed signs of abnormal lung performance. Of these, 5% had obstructive impairments, and 95% suffered from restrictive pulmonary conditions.

## Musculoskeletal Disorders

Beyond respiratory issues, the physical demands of brick kiln work contribute to widespread musculoskeletal disorders (MSDs). These conditions affect the muscles, bones, tendons, and ligaments, often causing chronic pain, limited mobility, and long-term disability. Work-related MSDs (WMSDs) result from repetitive tasks, awkward postures, and physically strenuous activities. Brick kiln workers routinely engage in stooping, squatting, lifting heavy loads, and working in static or twisted positions for extended periods without rest. The Bharaiwalas and nikasiwalas frequently suffer injuries, particularly to their feet and legs from falling bricks. Working barefoot greatly increases their risk of fractures and burns.<sup>22</sup> Over time, such ergonomic strain takes a serious toll on the body.

Evidence shows a strong link between duration of employment and the severity of musculoskeletal issues. One study indicated that workers with more than 10 years of experience were 3.1 times more likely to develop severe MSDs compared to those with under five years. The most frequent complaints were lower back pain (76.2%), shoulder pain (61.9%), wrist and hand discomfort (59%), and knee pain (55%).<sup>23</sup>

In addition to chronic MSDs like back pain, arthritis, and joint inflammation, frequent handling of bricks without

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21 Laura Nicolau, "Brick kiln pollution and its impact on health: A systematic review and meta-analysis," *Environmental Research Volume 257*, 15 September 2024, <https://www.sciencedirect.com/science/article/abs/pii/S0013935124011253#:~:text=Mean%20respirable%20silica%20exposures%20were,suggest%20that%20exposures%20are%20high>. (accessed 8 July 2025)

22 Nosheen ambreen et al, "Status of Occupational Health and Safety in Brick Kiln Industries at Hatter Industrial Estate Haripur, Pakistan," *Journal of Environment* (2012), Vol. 01, Issue 02, pg 61 [https://www.researchgate.net/publication/313575520\\_Status\\_of\\_Occupational\\_Health\\_and\\_Safety\\_in\\_Brick\\_Kiln\\_Industries\\_at\\_Hatter\\_Industrial\\_Estate\\_Haripur\\_Pakistan](https://www.researchgate.net/publication/313575520_Status_of_Occupational_Health_and_Safety_in_Brick_Kiln_Industries_at_Hatter_Industrial_Estate_Haripur_Pakistan)

23 Mantu Paira and Bela Das, "Prevalence and Risk Factors of Musculoskeletal Disorders among South Asian Brick Kiln Workers: A Systematic Review and Meta-Analysis," *Indian Journal of Occupational and Environmental Medicine*, 31 March 2025, <https://pmc.ncbi.nlm.nih.gov/articles/PMC12017674/#:~:text=Prevalence%20and%20Risk%20Factors%20of,Review%20and%20Meta%20Analysis%20%2D%20PMC> (accessed 18 July 2025)



gloves or proper footwear leaves workers vulnerable to skin injuries. Cuts, abrasions, and lacerations often lead to infections, while prolonged exposure to heat and irritants can result in severe skin allergies. The lack of immediate medical care or timely intervention often turns minor injuries into long-term health issues.

## Women Reproductive Health Problems

In addition to respiratory and musculoskeletal burdens shared by all kiln workers, women face unique and often overlooked reproductive health risks. Women constitute a significant portion of the brick kiln workforce, often continuing to work through pregnancy or while nursing. Their own well-being is routinely sacrificed, overshadowed by economic necessity and the relentless struggle for survival. As a consequence, reproductive health conditions such as miscarriages, uterine prolapse, and vaginal infections are widespread and largely untreated.



Pregnant workers are especially vulnerable to the harmful environment: daily exposure to smoke, carbon monoxide, and fine dust particles, combined with extended standing, heavy lifting, and no rest, significantly raise the risks of miscarriage, preterm birth, and low birth weight. Without access to antenatal or postpartum care, many give birth without medical support—exposing them to critical complications and elevated maternal mortality.

During NCHR's field visit to a brick kiln, interviews with women vividly illustrated these risks. Ashraf Bibi, a mother of eight, returned to squatting brick molding just ten days after each delivery. Lacking medical care, she relied on painkillers and used unsanitary cloth to manage bleeding. This eventually caused a Hepatitis C infection, the result of poor hygiene and unsafe sanitary conditions.





Similar stories have been documented by NGOs such as ICC. An example is the story of Meera, eight months pregnant and working at the kiln, sought help from a *daiama* community midwife during a pain episode. The unverified medicine she received tragically resulted in the miscarriage of her son, underscoring the dangers of misinformation and unregulated care.<sup>24</sup>

Beyond pregnancy, women of all ages suffer from chronic fatigue, anemia, pelvic pain, and gynecological infections, worsened by nutritional deficiency, harsh labor, and inadequate sanitation. For Maya, who began menstruating at age 14 while working at the kiln, the absence of menstrual hygiene education and products has caused recurring infections and painful cramps—yet she continues laboring through debilitating monthly discomfort.

Young girls, often starting their menstrual cycles while working, are left unsupported. Without schooling or access to safe, sanitary methods, these adolescents face health risks in silence, as family and social taboos prevent open discussion or care.

Such serious conditions remain largely unaddressed—women endure long-term reproductive damage in silence, with virtually no access to healthcare, rest breaks, or social support.

## Poor Nutrition and Susceptibility to Illnesses

Nutritional deprivation is a critical yet often overlooked consequence of bonded labour in brick kilns. Many brick kiln workers (Bkws), especially women and children, exhibit signs of malnutrition, including low body mass index (BMI), chronic fatigue, and moderate to severe body pain—conditions that significantly impair their ability to work and recover from physical exertion.

The economic exploitation at the heart of bonded labour severely restricts workers' ability to access adequate and nutritious food. Families receive wages below the legal minimum, leaving them dependent on limited, low-quality diets that result in chronic undernourishment. This persistent lack of essential nutrients compromises immune function, leaving workers and their families highly vulnerable to infections, communicable diseases, and slow recovery from illness.

Among the most prevalent nutrition-related health issues is anemia, particularly among women and children. Caused by iron deficiency, anemia results in weakness, reduced cognitive performance, and decreased work capacity, further entrenching the cycle of poverty and ill-health. Additionally, widespread vitamin deficiencies such as lack of Vitamin A, D and B-complex are common among workers. These deficiencies contribute to poor eyesight, impaired bone development, and increased vulnerability to respiratory and skin infections.<sup>25</sup>

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24 "Hidden Realities: Exploring the Lives of Women Laborers in Pakistan's Brick Kilns," *International Christian Concern (ICC)*, 27 June 2024, <https://www.persecution.org/2024/06/27/hidden-realities-exploring-the-lives-of-women-laborers-in-pakistans-brick-kilns/#:~:text=But%20due%20to%20the%20proximity,to%20preventable%20tragedies%20during%20pregnancy.> (accessed 18 July 2025)

25 Mantu Paira and Bela Das, "Prevalence and Risk Factors of Musculoskeletal Disorders among South Asian Brick Kiln Workers: A Systematic Review and Meta-Analysis," *Indian Journal of Occupational and Environmental Medicine*, 31 March 2025, <https://pmc.ncbi.nlm.nih.gov/articles/PMC12017674/#:~:text=Prevalence%20and%20Risk%20Factors%20of,Review%20and%20Meta%20Analysis%20%2D%20PMC> (accessed 18 July 2025)

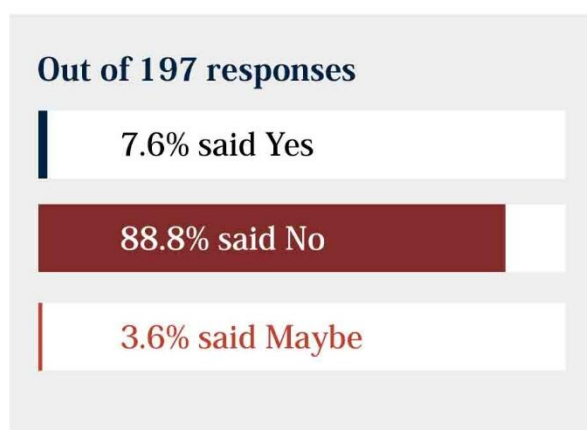


Children growing up in kiln communities face especially grave nutritional challenges. Deprived of adequate food and healthcare during formative years, they are at risk of stunted growth, developmental delays, and reduced immunity, undermining their long-term physical and cognitive potential.<sup>26</sup>

## Barriers to Healthcare Access

Healthcare facilities remain out of reach for most brick kiln workers, despite Provision 8 of the Punjab OSH Act, 2019, which requires the government to ensure workplace safety, provide first aid, and supervise employee health. According to data collected through the NCHR survey, 88.8% of brick kiln workers reported having no access to medical facilities. This alarming figure reflects both the geographic isolation of most kiln sites, which are typically located on the outskirts of urban centers, and the systemic neglect of marginalized labour communities.

*Do you have access to any medical facilities for children or maternity leave for women?*



Kilns are often situated far from hospitals or clinics, and workers usually lack the means, including transportation and financial resources, to seek timely medical assistance. As a result, even minor health issues are left untreated, frequently escalating into serious and chronic conditions. Restricted access to healthcare results in high rates of self-medication or reliance on unqualified doctors, which can further aggravate health problems and lead to dangerous complications. This is particularly critical for pregnant women, who often receive no prenatal care and deliver without medical supervision. Pregnancy-related complications, which could easily be managed with basic maternal health services, are common and contribute to significantly higher rates of maternal and infant mortality among kiln workers compared to the general population.

In addition to structural barriers, workplace culture and power dynamics further restrict access to healthcare. Kiln owners and *munshis* often discourage or outright deny requests for leave, viewing time taken for medical treatment as a threat to productivity. This punitive approach forces workers to continue laboring despite illness or injury, exacerbating their conditions and leading to avoidable suffering, long-term disability, and in some cases, premature death. Ironically, Provision 11 makes the workplace manager responsible for issuing hygiene cards to every employee. It also requires that workers be medically examined twice a year, in January and July, by a certified medical practitioner to check for contagious, occupational, or infectious diseases. The results of these examinations must be recorded and

<sup>26</sup> Ankur Chaudhari and Lina Bandyopadhyay, "A Study on Nutritional Status and its Determinants among Under-Five Children in Brick-kilns of a Rural Area of Hooghly District, West Bengal," *Indian Journal of Community Medicine*, April 2024, <https://pmc.ncbi.nlm.nih.gov/articles/PMC11155956/> (accessed 8 July 2025)



made available for government inspection.

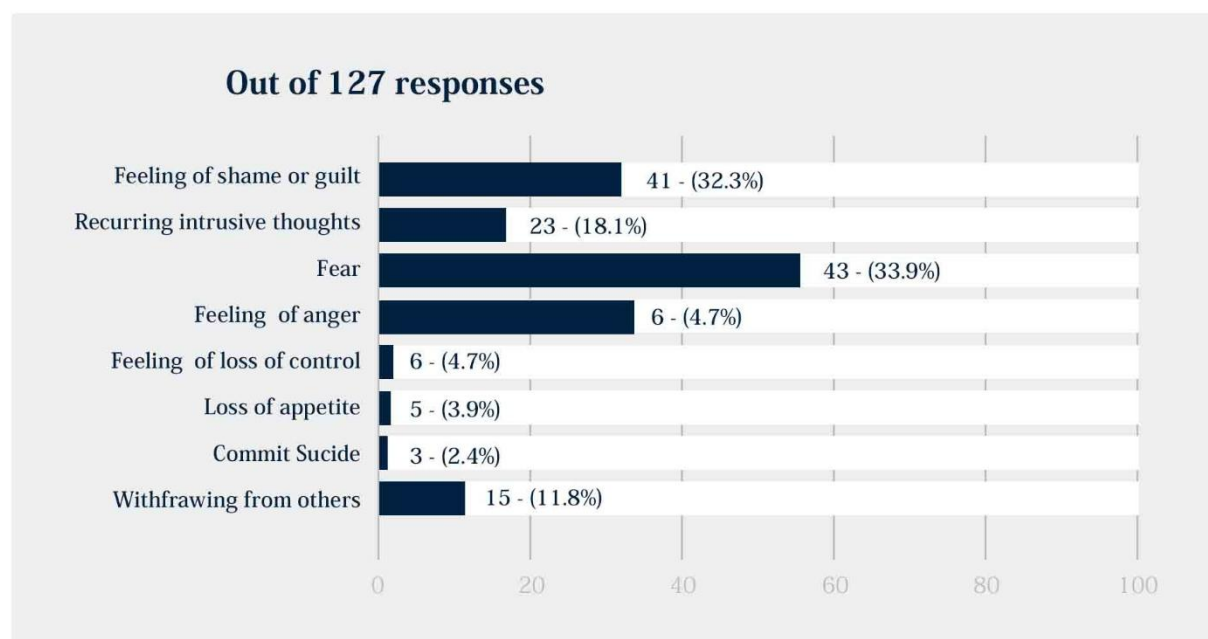
These realities stand in incongruity to existing legal provisions. The complete absence of even the most basic health services such as first aid treatment at brick kilns highlights the deep disconnect between policy and practice.

## Mental Health and Psychological Trauma

The psychological consequences of bonded labour at brick kilns are profound, yet frequently overlooked. Workers endure chronic stress arising from financial insecurity, exploitative working conditions, and the constant threat of violence or abuse. These pressures accumulate over time, leading to significant mental health challenges that often go undiagnosed and untreated.

The NCHR survey conducted revealed a broad spectrum of psychological distress. The most commonly reported mental health issue was fear, identified by 57.5% of respondents, as detailed in the data table above. This pervasive sense of fear is not merely situational—it is deeply embedded in the power dynamics of kiln life. When the NCHR team met with a group of workers in a safe setting, many were still unable to make eye contact. This behavior is a result of being forced by munshis (supervisors) to keep their heads down and avoid direct gaze—a form of social conditioning rooted in intimidation and control. One female worker, for instance, continuously fidgeted with her hands during questioning, a visible sign of anxiety. The expressions on many workers' faces conveyed a profound sense of hopelessness, emotional exhaustion, and psychological fatigue. Several reported sleep disturbances and symptoms resembling post-traumatic stress disorder (PTSD).

*Have experienced any psychological effects as a result of any abusive behavior? (select all that apply)*





The mental health toll of bonded labour extends beyond individual workers. Workplace violence and harassment often affect not only the direct victims but also their family members, particularly children. Growing up in such oppressive environments, children frequently experience long-term psychological harm, including developmental delays, impaired cognitive functioning, and emotional disorders. The trauma is intergenerational and can have lasting implications on a child's ability to thrive. A 2018 study conducted by the International Labour Organization (ILO) on the psychological health of children employed at brick kilns revealed that these children face a significantly higher risk of psychosocial distress compared to their non-working peers. The findings underline the severe mental health impacts of child labour in brick kilns.<sup>27</sup>

Women workers face an even more acute psychological burden. In addition to the physical demands of their labour, many are subjected to sexual harassment, verbal abuse, and gender-based violence. These experiences frequently lead to deep psychological trauma and emotional distress.

In the absence of formal mental health services, 97.8% of surveyed workers reported turning to spiritual healing as their primary coping mechanism. Many said they turn to pastors or spiritual leaders for support. These figures serve as informal support systems, helping them cope with emotional strain through prayer and religious guidance. While these practices may

provide relief, they should be supported with structured psychological care and trauma-informed mental health services.

*After experiencing adverse psychological effects, did you consult with someone professionally?*

#### Out of 138 responses

2.2% A spiritual healer

97.8% Psychiatrist

The lack of up-to-date data on the health conditions of brick kiln workers severely limits the ability to design effective interventions. Without accurate evidence, the scale of harm remains underestimated, and bonded labourers continue to be excluded from essential health protections and policy responses.

<sup>27</sup> Catherine Pellenq, Susan Gunn and Laurent Lima, "The psychological health of children working in brick kilns," *ILO 2018* [https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.ilo.org/media/410011/download&ved=2ahUKEwjg-JDi4-aOAXVlk\\_OHHdAeM4EQFnoECBgQAQ&usg=AOvVaw2ZJNDtZwfBARv499C3BzFi](https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.ilo.org/media/410011/download&ved=2ahUKEwjg-JDi4-aOAXVlk_OHHdAeM4EQFnoECBgQAQ&usg=AOvVaw2ZJNDtZwfBARv499C3BzFi) (accessed 20 July 2025)







## Chapter 7

# The Broken System: Law in Theory, Failure in Practice

Building on the national legislations and international commitments presented in *Volume 1* titled “*The issue of Bonded Labour in Pakistan (2023)*,” this chapter offers a focused examination of the provincial legal and institutional challenges specific to the brick kiln sector in Punjab.

### Summary of Legal Frameworks in Volume 1:

Volume 1 of the NCHR Report mentioned above, outlines Pakistan's commitments under international law, particularly through its ratification of the eight fundamental ILO conventions. These commitments extend across all industries, including the brick kiln sector, which is thereby obligated to uphold human rights within its operations. As a result, the brick kiln industry must ensure the protection of workers, especially women and children. It must also guarantee the provision of minimum wages and social security benefits. In addition, the industry should actively prevent the exploitation of small loans that can lead to bonded labour.

To complement its international commitments, Pakistan's legal foundation against forced labour begins with the Constitution, which enshrines the principles of dignity, equality, and humane working conditions—forming the basis for abolishing bonded labour. Although numerous labour laws exist,

many do not directly address bonded labour but intersect with the issue in sectors such as brick kilns. The Pakistan Penal Code (PPC), for instance, includes provisions under Sections 370 and 371 that criminalize slavery, prescribing

#### Legislations regarding Bonded Labour

•**Constitution of Pakistan** – elimination of all forms of exploitation (**Article 3**), the prohibition of slavery (**Article 11**), Protection of fundamental rights (**Article 9**), freedom from violation of their persons and homes (**Article 14**), freedom of movement (**Article 15**), and the equality of all citizens under (**Article 25**).

•**Forced Labour Convention 1930** (No. 29) – aims to suppress the use of forced labour in all its forms within the shortest time period.

•**Abolition of Forced Labour Convention 1957** (No. 105) – Prohibits specific forms of forced or compulsory labour

•**Equal Remuneration Convention, 1951** (No. 100) – Promotes the principle of equal remuneration for both men and women for work of equal value

•**Discrimination (Employment and Occupation) Convention, 1958** (No. 111) – Mandates equal opportunity or treatment.

•**Minimum Age Convention, 1973** (No. 138) – Aims at abolishing child labour by establishing a minimum age standard for work.

•**Worst Forms of Child Labour Convention, 1999** (No. 182) – Prohibits and eliminates the most dangerous and exploitative forms of child labour.

•**Freedom of Association and Protection of the Right to Organize Convention, 1948** (No. 87) – Safeguards the right of both workers and employers to form and join organisations of their own choosing, free from interference by authorities.

•**Right to Organize and Collective Bargaining Convention, 1949** (No. 98) – Encourages and promotes collective bargaining



penalties ranging from up to ten years' imprisonment to life sentences, along with fines. However, these laws have limited applicability to the specific conditions faced by brick kiln workers and fail to capture the nuances of bonded labour in that context.

In response to the growing prevalence of bonded labour, Pakistan enacted the Bonded Labour System (Abolition) Act in 1992, followed by the corresponding Rules in 1995—three years later. Sections 11 and 12 of the Act impose penalties, including imprisonment, for enforcing bonded labour. However, due to a near absence of convictions, the law is not taken seriously by employers.

Provision 6, titled "Constitution and Meeting of the Vigilance Committee," mandates the establishment of a Vigilance Committee in every district, housed within the office of the Deputy Commissioner, to effectively handle and resolve complaints related to bonded labour. These committees are to include 15 members, comprising representatives from the police, judiciary, labour and welfare departments, health services, trade unions, and NGOs.

A secretary, appointed to the committee, is required to report instances of bonded labour to the District Magistrate. However, chronic understaffing of labour inspectors and the often superficial nature of inspections hinder enforcement.

Judicial interventions remain infrequent, with prolonged delays in processing First Information Reports (FIRs) further discouraging victims from seeking justice. A stark example is the recent case of 21 labourers who endured unlawful detention for four years before the Lahore High Court finally ordered their release. Petitions filed by Shahid Masih and Ishtiaq, seeking relief against the illegal confinement of brick kiln workers, remained unresolved in court for the entire duration of their detention.<sup>28</sup> This severe delay not only underscores the sluggish judicial response but also highlights the systemic obstacles faced by victims, undermining their faith in legal recourse and perpetuating cycles of exploitation.

The Rules also mandate the establishment of a fund for the rehabilitation and welfare of freed bonded labourers. However, no funds have been allocated to date, rendering this provision ineffective. Compounding the issue, many workers remain unaware of their rights, while kiln owners continue to exploit legal loopholes—particularly around *peshgi* (advance payments)—to trap labourers in cycles of debt and immobility. The absence of a dedicated social mobiliser—someone tasked with visiting brick kilns, raising awareness, and monitoring working conditions—further limits the effectiveness of the Vigilance Committees. Ultimately, even the most well-intentioned laws lose their relevance and impact when they are not properly implemented and enforced.

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28 "21 captive kiln workers rescued," *The Express Tribune*, 10 July 2025.  
<https://tribune.com.pk/story/2555029/21-captive-kiln-workers-rescued> (accessed 25 July 2025)



## Laws Pertaining to Bonded Labour from Punjab Government

Following the devolution of power under the 18th Constitutional Amendment, provincial governments in Pakistan gained greater authority to design development strategies and tailor labour laws to their specific needs. With increased financial autonomy, the Punjab Government took notable steps to address bonded labour in the brick kiln sector by strengthening legal protections and closing loopholes in existing national legislation.

One of the key advancements was the Punjab Bonded Labour System (Abolition) (Amendment) Act, 2018, which amended the original Bonded Labour System (Abolition) Act, 1992. This provincial amendment aimed to address critical shortcomings in the national law, particularly those related to peshgi (advance payments), a practice that often results in bonded labour.

A significant improvement in the 2018 amendment is the explicit regulation of the peshgi system. Under Section 4, employers are legally required to maintain accurate records of all advance payments made to workers and to follow a clear mechanism for their reimbursement. This measure seeks to increase transparency and accountability in employment practices.

In addition, the Punjab Prohibition of Child Labour at Brick Kilns Act, 2016, under Section 3, mandates that all worker engagements be documented through a written contract using a prescribed format. This contract must

clearly state the terms of employment, including wages, the amount of any peshgi, and the repayment schedule. Any employment that does not comply with these conditions is classified as bonded labour.

Furthermore, while employers are permitted to provide advances, the law strictly limits the amount to a maximum of PKR 50,000.<sup>29</sup> The rationale behind this cap is to prevent workers from becoming trapped in long-term debt. By keeping the loan amount small, it becomes more manageable for workers to repay, reducing the risk of debt spiraling into bonded labour. This provision is a critical safeguard intended to break the cycle of dependency and ensure that financial advances do not become tools of exploitation.

Section 12 of the law criminalizes the enforcement of rituals or customs that lead to bonded labour, prescribing imprisonment of two to five years and a minimum fine of PKR 350,000. While these provisions reflect a strong legislative intent, implementation on the ground remains significantly weak. Courts often fall short of enforcing the prescribed punishments, which undermines the law's deterrent effect and emboldens violators.

Another major barrier is the deep-rooted distrust in law enforcement agencies. Although workers are legally entitled to file complaints and register FIRs at their local police stations, many hesitate due to fear, past inaction, or lack of confidence in police responsiveness. From 2021 to 2025, only 316 human rights complaints related to brick kilns

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<sup>29</sup> The Punjab Prohibition of Child Labour at Brick Kilns Act, 2016 under section 4 titled Limit of Advance (Peshgi), <http://punjablaws.gov.pk/laws/2475.html> (accessed 15 July 2025)

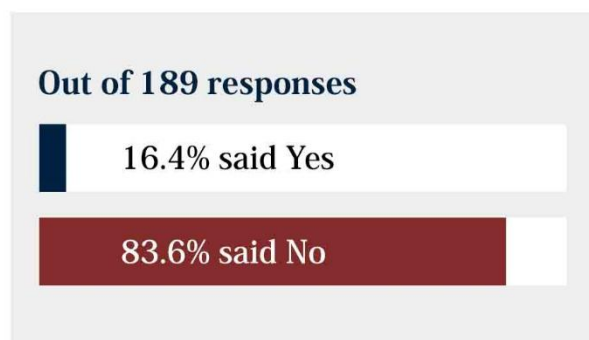


were officially registered across Punjab. Of these, just 89 cases were adjudicated, and only 74 individuals were convicted—highlighting a low prosecution and conviction rate that fails to send a strong message to violators and perpetuates a culture of impunity.<sup>33</sup>

To address the enforcement gap, the Punjab Government introduced another amendment to the original Act via Section 15, assigning district magistrates an additional inspector responsible for proactively monitoring the presence of bonded or forced labour. However, ground-level enforcement remains minimal.

NCHR survey data shows that only 16.4% of workers had seen a government inspector visit their brick kiln. In practice, inspectors often limit their role to responding to formal complaints rather than proactively inspecting worksites. As a result, violations frequently go undetected, and compliance with bonded labour laws remains inconsistent.

*Have you seen any inspection or visits from government officials at the kiln?*



## Punjab Labour Department and District Vigilance Committees (DVCs)

In recognition of longstanding institutional gaps in enforcement and oversight, the 2018 Amendment Act aimed to strengthen complaint mechanisms for brick kiln workers, enabling them to report grievances more openly through District Vigilance Committees (DVCs). As highlighted in *Volume 1* of the NCHR report, Punjab remains the only province in Pakistan to have successfully notified DVCs in every district.

Following this development, each Deputy Commissioner (DC) office across Punjab's 36 districts has established a functional DVC. According to the Punjab Labour Department, between June 2024 and June 2025, a total of 376 DVC meetings were convened across the province. Further details are provided in the appendix of this report. Workers now have the opportunity to lodge complaints locally through DVC representatives—an important step toward improving access to justice at the grassroots level.

The 2018 amendment also expanded the DVCs' mandate—particularly under Section 15(b)—to include awareness-raising among both employers and labourers regarding their rights and responsibilities. Additionally, DVCs were tasked with mediating and resolving disputes between workers and kiln owners, further reinforcing their central role in enforcement.

Despite this broadened scope, the committees' effectiveness remains limited. Over the past year, DVCs

officially received and resolved only 20 complaints<sup>30</sup> —a figure that underscores both the lack of trust in these bodies and the low levels of awareness among workers about the mechanisms available to them. This underwhelming response fails to create the deterrence that the law was designed to achieve and highlights a disconnect between legislation and enforcement.

This implementation gap can be attributed to several persistent challenges: limited financial resources, short-staffed enforcement units, and low motivation among government personnel assigned to monitor and follow up on bonded labour cases.

During a visit by the NCHR to the Punjab Labour Department, several existing complaint platforms were reviewed. According to Deputy Secretary Mr. Rao, the department has established a dedicated complaint cell at its Lahore head office to facilitate walk-in registrations for bonded labour victims. Additionally, in 2023, the department launched a helpline (1314) to allow workers to call in, report complaints, seek information, and access support remotely.

However, these multiple complaint channels have not been integrated into a centralized digital system. The absence of a unified portal to amalgamate and categorize complaints from the DVCs, the complaint cell, and the helpline makes it extremely difficult to track systemic issues, analyze trends, or formulate informed, data-driven policy responses. This gap significantly weakens the ability to respond

## Projects with Positive Impacts

In recent years, the Punjab government, through its Annual Development Programme, launched targeted interventions to address bonded labour in the brick kiln sector. One major initiative was the *Elimination of Bonded Labour in Brick Kilns (EBLIK)* project, implemented from 2012 to 2018 in Lahore and Kasur, with a budget of PKR 123.367 million. It was the first time in Pakistan's history that development funds were specifically allocated to combat bonded labour. The project focused on CNIC and birth registration, non-formal education for children and adults, hygiene awareness, and legal rights education. Although temporarily disrupted by COVID-19, the project was relaunched as EBLIK-4D in 2020 with an expanded budget of PKR 196.836 million and extended to four additional districts: Sargodha, Faisalabad, Gujrat, and Bahawalpur.<sup>31</sup>



30 Data extracted from Inspector General Police, Punjab Police (accessed 29 May 2025) For further details check the annexure

31 Shahab Omer, "Outlawed long ago, brick kiln bonded labour continues challenge the national conscience," Profit, 2021, <https://profit.pakistantoday.com.pk/2021/05/09/outlawed-long-ago-brick-kiln-bonded-labour-continues-challenge-the-national-conscience/> (accessed 7 July 2025)



## Key Achievements of EBLIK-4D :<sup>32</sup>

- 12,760 CNICs processed in the four target districts, with an additional 54,582 CNICs facilitated across Punjab—covering nearly one-third of the total estimated brick kiln workforce.
- 200 Non-Formal Education (NFE) centers were established, enrolling 7,894 children.
- 1,128 adults completed a six-month literacy cycle (Gujrat: 243; Faisalabad: 203; Sargodha: 460; Bahawalpur: 222).
- 144 health camps were organized, providing medical treatment to 6,852 workers and family members.
- 7,000 hygiene kits distributed among NFE learners across the four districts.
- 219 awareness sessions held on key topics such as legal aid, veterinary services, minimum wage laws, CNIC/birth registration, and the importance of education.

These achievements demonstrate tangible progress in integrating brick kiln workers into formal systems and improving their access to education, healthcare, and identification services.

Running parallel to EBLIK, the Punjab government also initiated the "Eliminate Child and Bonded Labour Project", also known as the Integrated Project for the Promotion of Decent Work for Vulnerable Workers in Punjab. Launched in 2014 as part of the ADP,

this seven-year project aimed to eliminate child and bonded labour through a comprehensive approach, including :<sup>33</sup>

- Rehabilitation of freed bonded labourers
- Coordination and networking
- Legislative strengthening
- Capacity building and skills training

Unfortunately, despite its ambitious design, the project was terminated after only three years due to financial constraints and administrative challenges. While the project's closure marked a setback, it nonetheless laid foundational work for future initiatives.

Furthermore, the Government of Punjab, in collaboration with several environmentally focused organizations such as the Climate and Clean Air Coalition (CCAC) and the International Centre for Integrated Mountain Development (ICIMOD), undertook significant efforts to reform Pakistan's brick kiln sector. This sector had long been a major contributor to air pollution and smog, particularly during the winter season when atmospheric conditions worsened the buildup of harmful emissions. In response, the government launched a comprehensive initiative to transform the industry into one that was more energy-efficient, environmentally sustainable, and worker-friendly.

A cornerstone of this reform was the introduction and widespread implementation of Zigzag Kiln (ZZK)

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<sup>32</sup> As mentioned in the Punjab Labour and Human Resource Department website. [https://labour.punjab.gov.pk/elimination\\_bonded\\_punjab](https://labour.punjab.gov.pk/elimination_bonded_punjab) (accessed 25 June 2025)

<sup>33</sup> As mentioned in Directorate General Monitoring and Evaluation website. <https://dgme.punjab.gov.pk/system/files/EVL-726%20Evaluation%20Report%20on%20Elimination%20of%20Child%20and%20Bonded%20Labour%20Project%20%28Integrated%20Project%20for%20Decent%20Work%20For%20Vulnerable%20W.pdf> (accessed 25 June 2025)

technology —a cleaner and more efficient alternative to traditional fixed-chimney kilns. In ZZK systems, bricks were stacked in a zigzag pattern, and airflow was directed in a winding path through the kiln. This design increased heat transfer efficiency and ensured more complete combustion, which reduced coal consumption by up to 20% and significantly lowered emissions of black carbon and particulate matter.<sup>34</sup> These improvements not only help reduce the environmental footprint of the industry but also contribute to better public health and safer working conditions for laborers.

The success of the government's efforts is evident in the outcome: all brick kilns across Punjab have adopted Zigzag Kiln technology. While these projects mark positive steps, their limited coverage highlights the need for similar efforts to be scaled across all provinces of Pakistan. The work done so far is valuable but not yet enough.

## Global Transitions Towards Humane and Mechanized Brick Production

Many countries have successfully transitioned towards more modern, efficient, and humane brick production methods. China, currently the world's largest brick producer, has substantially replaced traditional kilns with fully automated production lines, employing advanced technologies such as tunnel kilns and extrusion machines. This transition has significantly improved brick quality, lowered emissions, and

ensured a more regulated labor environment. Similarly, Bangladesh, previously burdened by severe labor abuses and environmental degradation, has increasingly adopted mechanized brick-making through Vertical Shaft Brick Kilns (VSBKs) and Hybrid Hoffman Kilns (HHKs). This shift has considerably reduced both human exploitation and carbon emissions. In Uzbekistan, the introduction of semi-automated and fully mechanized brick-making facilities has diminished labor dependency, enhanced working conditions, and improved overall product quality, substantially curbing child labor and increasing energy efficiency. Pakistan now has the opportunity to follow these global examples. By proactively investing in mechanization and modern technologies, Pakistan can modernize its brick kiln sector, boost productivity, safeguard vulnerable communities, minimize environmental damage, and ultimately dismantle the cycles of generational bonded labor.

## Trade Unions

The right to form and join trade unions is recognized both internationally and nationally. According to ILO Conventions No. 87 and 98, workers and employers, without distinction, have the right to establish and join organizations of their own choosing. These organizations have the freedom to draft their constitutions, elect representatives, manage internal affairs, and formulate their programs independently. Pakistan upholds this right under Article 17 of its Constitution, recognizing freedom of association as a fundamental right. The

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<sup>34</sup> Rina Saeed Khan, "Zigzag way to end brick kiln pollution," *Heinrich Boll Stiftung*, 21 february 2022, <https://afpak.boell.org/en/2022/02/21/zigzag-way-end-brick-kiln-pollution#:~:text=The%20zigzag%20stacking%20technique%20uses,end%20up%20saving%20on%20coal.> (accessed 10 June 2025)



Industrial Relations Act, 2012 serves as the key legislation regulating trade unions, employer-employee relations, and dispute resolution mechanisms.

In the brick kiln sector of Punjab, both employers and workers have organized themselves into trade unions. According to the Punjab Labour Department, a total of 40 trade unions are registered under this framework.

The Brick Kiln Owners Association of Pakistan (BKOAP) is the most prominent and organized employer-side union in the sector. It has a paid membership of around 500 members and plays an active role in representing the interests of kiln owners. BKOAP has signed several Memorandums of Understanding (MoUs) with NGOs such as Brooke Pakistan to improve the welfare of both workers and animals. The association also works closely with international agencies like the International Labour Organization (ILO) to address exploitative labor practices and with the United Nations Environment Programme (UNEP) on climate-focused initiatives under the Climate and Clean Air Coalition (CCAC).

Due to its strong connections with the government and international organizations, the Brick Kiln Owners Association of Pakistan (BKOAP) holds a dominant position in policy advocacy and sector-wide decision-making, especially when compared to workers' unions.

In an interview with the NCHR, Mr. Mehr Abdul Haq, Acting Chairman of BKOAP, acknowledged ongoing collaboration with various institutions but expressed concern over the lack of government support in establishing effective social

security benefits and setting minimum wage mechanisms for brick kiln workers. BKOAP argued that brick kiln laborers are seasonal workers, often unable to work during the rainy season or smog season when kilns are shut down. As a result, kiln owners claim that it is not feasible for them to contribute regularly to the Punjab Employees Social Security Institution (PESSI) as other industrial sectors do. To address this, BKOAP proposed negotiating an annual lump-sum contribution model, but reported that PESSI has shown no willingness to engage on the matter.

Additionally, BKOAP pointed out that while the government mandated the conversion to Zigzag Kiln (ZZK) technology, it failed to deliver on its promises of providing subsidies and technical training, leaving many kiln owners to shoulder the cost and learning curve alone. On the workers' side, the Pakistan Bhatta Mazdoor Union (PBMU) is the most active trade union advocating for brick kiln laborers. However, it remains relatively weaker in influence and resources when compared to BKOAP. The union has repeatedly raised concerns about unsafe and exploitative working conditions, violations of minimum wage laws, lack of social security coverage, and unhygienic living conditions, including missing washrooms and unsafe drinking water.

In several instances, PBMU leaders have faced serious threats and violence. The Union Chairman once claimed that BKOAP operated "like a mafia," allegedly threatening union members and preventing them from accessing workers at kilns. In one notable case, PBMU filed a petition in the Lahore High Court to rescue a child laborer held in

chains. While the child and his family were recovered by police, no legal action was taken against the kiln owner.<sup>35</sup>

Despite a history of tension between brick kiln employers and workers, efforts toward constructive engagement were made during a tripartite dialogue held on December 16, 2020, organized by the Labour Education Foundation (LEF) in Lahore. The meeting brought together the Pakistan Bhatta Mazdoor Union (PBMU), the Brick Kiln Owners Association of Pakistan (BKOAP), government officials, and civil society members. Key issues raised by PBMU included non-payment of minimum wages, lack of social security coverage, and poor working and living conditions. In response, BKOAP acknowledged the need for reforms and proposed district-level wage setting to match local economic conditions. The dialogue resulted in several agreements: improving washroom and drinking water facilities at kiln sites, forming a committee to explore decentralizing the Minimum Wage Board, and jointly engaging with PESSI to simplify social security contributions—marking an important step toward collaborative solutions in the sector.

While no solid implementation has yet been achieved, the dialogue marked an important first step, and the government should actively encourage more such forums to promote sustained and inclusive reform in the sector.

## Civil Society Organizations:

In contrast to the institutional limitations of state mechanisms, NGOs have played a critical role in directly addressing the needs of bonded labourers in the brick kiln sector. Some of the most prominent NGOs working in this space include the Bonded Labour Liberation Front (BLLF) Pakistan, a Lahore-based organization founded in 1990 that has released over 85,000 bonded labourers and provides legal aid, rehabilitation, and education services;<sup>36</sup> the Pakistan Institute of Labour Education and Research (PILER), established in 1982, which focuses on building a democratic and informed labour movement through research, training, and advocacy; and AGHS Legal Aid Cell, a pioneering human rights organization known for its legal support to women and informal workers, including bonded labourers.

An important and long-standing partner of the (NCHR) is the (PPI), which has made significant contributions in both the liberation and rehabilitation of bonded labourers. Over the past year, PPI has facilitated the release of a substantial number of families from bonded labour across several districts. Beyond securing their freedom, the organization also provides holistic rehabilitation support including relocation, housing assistance, vocational training, school enrolment for children, medical treatment, spiritual support, and small business support to help families regain their independence and stability.

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35 Saadia Salahuddin, "Violence builds up," *The News on Sunday*, 16 Novemebr 2014,

<https://www.thenews.com.pk/tns/detail/557473-violence-against-brick-kiln-workers> (accessed 4 June 2025)

36 Syeda Ghulam Fatima Gilani, Secretary General of BLLFP, Her speech at the 2022 Gleitzman Award winner for courage, activism, and the fight to end bonded labour,

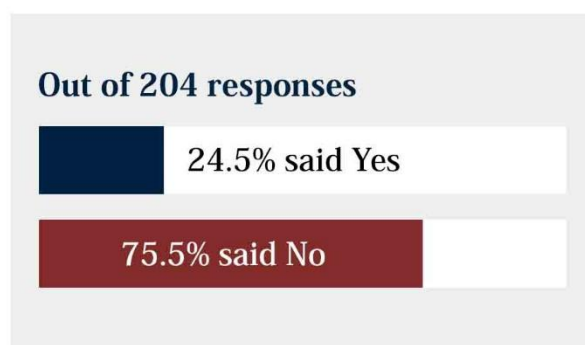
<https://www.hks.harvard.edu/centers/cpl/publications/2022-gleitsman-award-winner-syeda-ghulam-fatima-gilani-courage-activism> (accessed 24 July 2025)



District Wise Slaved Families Released from Brick Kilns in Punjab - 2024 and 2025								
2024					2025			
District Name	Children	Women	Men	Total	Children	Women	Men	Total
Kasur	599	233	239	1071	402	214	223	839
Faisalabad	610	222	246	1078	516	170	190	876
Lahore	343	106	109	558	50	16	17	83
Sheikhupura	238	105	107	450	33	12	14	59
Khanewal	205	86	94	385	274	143	144	561
Gujranwala	89	33	36	158	32	9	12	53
Sahiwal	31	16	18	65	0	0	0	0
Rawalpindi	3	3	3	9	0	0	0	0
Okara	4	1	2	7	0	0	0	0
Bahawalpur	0	0	0	0	15	3	5	23
Nankana Sahab	0	0	0	0	9	4	4	17
Gojra	0	0	0	0	11	5	5	21

However, when workers were surveyed regarding their awareness of organizations—whether governmental or private—that provide support or assistance, a striking 75.5% responded that they were unaware of any such resources. This alarming lack of knowledge underscores a critical gap in outreach and communication efforts. It also highlights the urgent need for targeted awareness campaigns and community-level interventions to ensure that workers are informed of available support mechanisms. Without increased awareness, vulnerable brick kiln workers remain isolated, unable to access essential protections and services designed to safeguard their rights and well-being.

*Do you know any organization or government programs that provide support for people working in brick kiln?*













## Chapter 8

# Recommendations

To effectively combat bonded labour and the systemic abuse prevalent within Pakistan's brick kiln sector, the following multi-tiered recommendations are proposed for immediate consideration.

### Short-Term Recommendations

#### 1. Ratify ILO Conventions

Pakistan should ratify ILO Convention No. 155 on Occupational Safety and Health as well as Convention No. 190 on Violence and Harassment in the World of Work. This is an immediate step to align national labour policies with global best practices. The federal government (through the Ministry of Labour/Human Resource) should initiate the ratification process without delay, in consultation with provincial authorities, so that Pakistan formally commits to upholding safer working conditions and eliminating workplace harassment. Ratification within the next year would frame domestic legislation to these international standards and demonstrate Pakistan's commitment to protecting brick kiln workers and other vulnerable laborers.

#### 2. Amend the Punjab Occupational Safety and Health Act (2019):

Drawing on the Nepal OSH Directive for the Brick Industry,<sup>37</sup> the Act should be amended as an immediate reform to mandate minimum workplace and living conditions (WLCs) at brick kilns – i– including access to PPE gear, safe drinking water, sanitation facilities and adequate waste disposal system. The Punjab Labour Department must draft these amendments and present them to the Provincial Assembly for prompt enactment. By establishing clear, legally binding WLC standards, labour inspectors will be empowered to enforce compliance, so no kiln operates below basic health and safety benchmarks. This swift legislative change will lay the groundwork for improved daily conditions and dignity for kiln workers.

#### 3. Improve Workplace and Living Conditions (WLCs):

Special support for small brick kilns is critical, as many lack the capacity to meet new labour standards on their own. In the short term, the Labour Department should launch cluster-based improvement programs that group small kiln

37 Aakriti Kayastha, "Assessing the living and working conditions of brick kiln workers in bhaktapur district," *Dissertation submitted to Kathmandu University School of Arts*, October 2023, <https://sustainabilitylab.byu.edu/0000018d-604d-dc79-a5af-63cf18e50001/aakriti-kayastha-thesis-pdf> (accessed 28 July 2025)



owners together to jointly invest in facilities like clean water supply, proper toilets, PPE gear and adequate waste disposal system. Interventions can be done in collaboration with local authorities or NGOs, providing technical support (for example, guidance on low-cost sanitation solutions) and incentives for compliance – such as publicly recognizing or certifying kilns that meet WLC standards. Workers should simultaneously be made aware (through on-site trainings and community meetings) that better living and working conditions will lead to better productivity and health. This awareness, coupled with recognition schemes for compliant kiln owners, creates a win-win environment encouraging all kilns to upgrade conditions.

#### **4. Institutionalize Gender-Sensitive Oversight:**

The labour inspection regime must be reformed to address gender-based violence and harassment. Appointing female labour inspectors and officers within the inspection framework is an immediate priority – this ensures women workers at kilns have a safe channel to report abuse. The Punjab Labour Department should recruit or designate trained female inspectors to regularly monitor brick kilns, focusing on issues like sexual harassment, assault, and other abuses that women often face. Section 15 of the Punjab Bonded Labour (Abolition) Amendment Act 2018, which requires inspectors to actively check for bonded labour conditions and any associated exploitation during inspections, must be enforced strictly. Inspectors

who neglect to investigate or report on gender-based violence and bonded labour issues should be held accountable through performance reviews or disciplinary action. By promptly embedding a gender-sensitive approach in oversight – and ensuring non-compliant inspectors face consequences – authorities will improve detection of abuse and make it more likely that female workers speak up about violations.

#### **5. Integrate Violence and Harassment Provisions into Bonded Labour Legislation:**

Existing bonded labour laws should be strengthened to explicitly outlaw violence and harassment in brick kilns. This entails amending the Bonded Labour System (Abolition) Act 1992 (and the Punjab Bonded Labour (Abolition) Amendment Act 2018) to incorporate key provisions from the Protection Against Harassment of Women at the Workplace Act 2022. By doing so, any form of physical abuse, sexual violence, or psychological harassment against bonded workers would be clearly prohibited and punishable under the bonded labour legal framework. The Punjab Law Department, in consultation with human rights and women's rights experts, should draft these amendments for swift approval by the legislature. Implementing these legal changes in the immediate term will ensure comprehensive protection of workers' physical and mental well-being, sending a strong message that no abuse will be tolerated in Pakistan's brick kilns. It closes loopholes between labour and harassment laws, giving



w o r k e r s — e s p e c i a l l y  
women—stronger recourse to  
justice.

## **6. Establish a Centralized Complaint Management System:**

To streamline how abuses are reported and addressed, the government should unify all existing complaint channels into a single, accessible platform. The Punjab Labour Department should lead the development of a centralized digital portal (in partnership with IT authorities) that consolidates reports from District Vigilance Committees, police helplines, labour helplines, and relevant NGOs. This system should be launched as soon as possible to allow one-stop reporting for workers facing exploitation. A unified platform will assign each complaint a tracking number and enable real-time information sharing among agencies, facilitating swift, coordinated responses. By analyzing complaint data, officials can identify hotspots of abuse and plan targeted inspections or interventions where needed. Confidentiality and victim protection measures must be built into the system to encourage workers to come forward without fear of retaliation. In summary, a centralized complaint management system will improve accountability and strategic response planning, ensuring no plea for help is lost in bureaucracy.

*"When all complaints flow into one trusted system, no case slips through the cracks — every report becomes a step toward faster action, stronger accountability, and safer workplaces."*

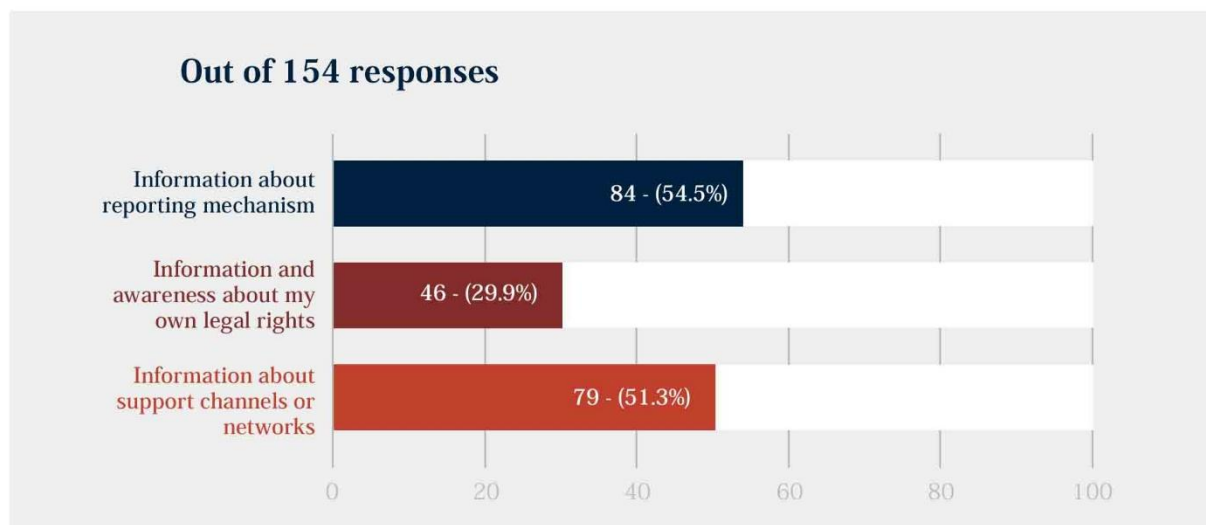
## **7. Strengthen the Role of District Vigilance Committees (DVCs):**

DVCs should become more proactive at the community level to prevent and respond to bonded labour. Immediately, the Labour Department and district authorities should expand DVCs' outreach and awareness activities among brick kiln workers. This can be achieved by deploying trained social mobilizers or partnering with local civil society organizations to visit kilns regularly, inform workers of their rights, and explain how to report abuse. Educational materials (in local languages) about the illegality of bonded labour, available helplines, and legal aid should be distributed. According to NCHR surveys, 54.5% of workers requested more information about reporting mechanisms, highlighting the urgent need to bridge this knowledge gap. DVCs must hold awareness camps and community meetings so that workers and their families understand that help is available and how to access it. The government should also ensure DVCs are adequately resourced and that their members (including officials from labour, police, and social services) coordinate effectively. By monitoring DVC performance and giving them the tools to engage directly with kiln communities, authorities will build trust at the grassroots level and empower workers to seek assistance when their rights are violated.

*"Empowered and visible DVCs can turn awareness into action — meeting workers where they are, earning their trust, and showing that help is not just a promise, but within reach."*



## *What would make it easier for people in your situation to report abuse or seek help?*



### **8. Facilitate Social Protection:**

No reform will be complete without a safety net for workers. The Punjab government should reinstate negotiations between PESSI (Punjab Employees Social Security Institution) and brick kiln owners to bring kiln laborers under formal social protection schemes. A practical solution is to introduce an annual lump-sum contribution model for kiln owners, replacing the complex per-worker monthly contributions with a single yearly payment that covers all their workers' social security enrollment. This negotiated arrangement should be treated with urgency so it can be finalized in the near term (for example, in the upcoming fiscal year). Once in place, it will enable brick kiln workers and their families to access healthcare services (through social security hospitals/clinics), maternity benefits for women workers, disability coverage, and pensions upon retirement age. The Labour Department can mediate this

public-private collaboration – potentially offering initial incentives or subsidies to kiln owners to encourage enrollment – and ensure that worker registrations with PESSI are carried out smoothly (facilitating CNIC documentation where needed). Integrating these informal sector workers into the social security system will not only protect them from health and income shocks but also reduce their economic vulnerability. In the long run, providing healthcare and income security to kiln workers helps break the cycle of dependency that often leads to bonded labour in the first place.

*"Extending social security to kiln workers is more than a benefit — it's a lifeline, protecting families from health and income shocks and breaking the cycle of exploitation."*

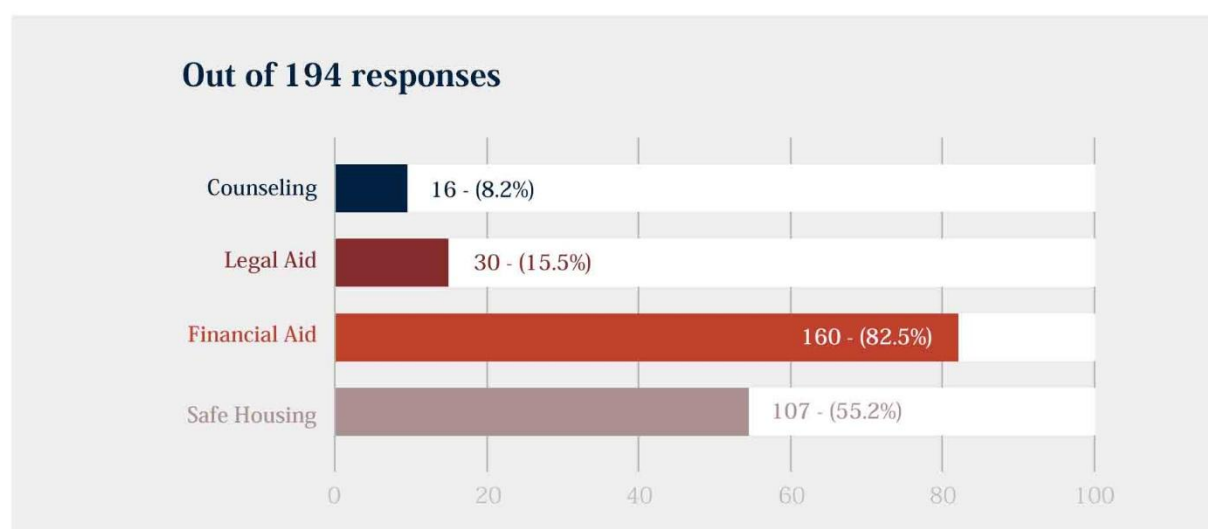
## Long-Term Recommendations

### 9. Develop a Rehabilitation Fund for Freed Bonded Labourers:

For a sustainable solution to bonded labour, Pakistan must plan beyond rescue and towards rehabilitation. The government should establish a dedicated Rehabilitation Fund – in collaboration with NGOs, international donors, and the private sector – to support bonded labourers who win their freedom. This fund (managed perhaps jointly by the Labour and Social Welfare Departments, with oversight from human rights bodies) would finance a comprehensive package of services to help liberated workers rebuild their lives. Key support areas include immediate shelter or housing, so families leaving a brick kiln have a safe place to stay; vocational training and skills development programs to improve their employment opportunities; seed capital or micro-loans for those looking to start small businesses; and psychosocial

counseling to address the trauma of prolonged exploitation. Planning for this fund should begin right away, with a target to have it operational (with initial funding secured) within a year. The urgency of such a mechanism is underscored by NCHR's survey findings – 82.5% of workers expressed a strong desire for alternative livelihoods as a way out of bonded labour. By providing the resources for freed labourers to become self-sufficient, the fund will prevent them from falling back into debt bondage out of desperation. In the long term, this rehabilitation fund represents a commitment to not just free people from a life of slavery, but to fully restore their independence and dignity through meaningful reintegration into society. Multi-agency coordination and continuous funding (through government budget allocations and donor grants) will be essential to the success and sustainability of this fund.

*If there were services to help people like you, what kind of support would be helpful?*





## **10. Scale Up Proven Models Like EBLIK:**

Successful pilot projects should be scaled into province-wide programs. The Elimination of Bonded Labour in Brick Kilns (EBLIK) project – which was piloted with dedicated funds and showed tangible results in reducing bonded labour – should be expanded to all districts in Punjab with significant brick kiln activity. The Labour Department, in its long-term planning, ought to include EBLIK's expansion in the Annual Development Programme, ensuring adequate budget allocations each year to sustain and grow the initiative. A phased roll-out is advisable: prioritize districts with the highest incidence of bonded labour and gender-based violence for the first wave of expansion, then cover remaining kiln areas in subsequent phases over the next 3–5 years. Implementing EBLIK at scale will require inter-departmental collaboration. For example, the program's components such as helping workers obtain CNICs (national ID cards) and birth registrations will need coordination with NADRA (the national database authority); enrolling children in school or non-formal education will involve the Education Department; and providing alternate livelihood training might engage the Social Welfare or Industries departments. Ensuring rigorous monitoring and evaluation of the scaled-up program is also crucial – data on outcomes (e.g. number of families transitioned out of bondage, children educated, micro-loans granted, etc.) should be collected to measure impact and allow course corrections. The government can seek technical

assistance and funding support from international agencies or NGOs experienced in bonded labour eradication to strengthen EBLIK's implementation. By replicating and broadening what works, Punjab can make significant strides toward eliminating bonded labour in all brick kilns, rather than isolated pockets, and create a model that other provinces can follow.

## **11. Modernizing Brick Production:**

The brick kiln industry's long-term improvement depends on upgrading its production technology and methods. Modernizing brick production will reduce the reliance on exploitative manual labour and improve environmental outcomes. Following the example of Punjab, the government should transition all brick kilns in the country from traditional Fixed-Chimney Bull's Trench Kilns to environmentally friendly technology such as zigzag kilns. To make this practical, it should set a phased timeline of two to five years. These technologies significantly cut emissions and fuel consumption, which improves air quality and workers' health. Moreover, introducing mechanized processes for brick making – like mechanical brick molding or handling – can alleviate the drudgery and health risks of purely manual labour (often performed by women and children under bondage). To drive this transition, Punjab's authorities should offer incentives to kiln owners: for example, low-interest loans or tax rebates to retrofit or replace old kilns with cleaner technology, and technical training programs to help kiln operators and workers adapt to new



machinery. Inter-agency collaboration is needed – the Environment Department should work alongside the Labour Department to enforce emissions standards and certify cleaner technologies, while the Industries Department can facilitate technology transfer and innovation in the brick sector. Modernizing the industry is a gradual, long-term endeavor, but setting clear targets (such as converting all kilns to approved modern designs by a certain year) will guide consistent progress. Ultimately, a modern brick kiln sector would be more energy-efficient, less polluting, and easier to regulate, thereby ensuring that gains in workers' rights and safety are sustained by an upgrade in the industry's overall structure.

## **12. Promote Clean and Productive Kiln Practices:**

Sustainable progress in the brick kiln sector requires integrating labour welfare with environmental responsibility. The government should encourage the combined adoption of improved WLCs and cleaner production technologies as a unified strategy to boost productivity. In practice, this means that as kilns shift to cleaner operations (e.g. better combustion techniques, dust control, and alternative fuels), they must simultaneously provide better facilities and protections for workers – one effort should not come at the cost of the other. In the long run, compliance with labour standards (fair wages, safe conditions, no bonded labour) and environmental standards (emission limits, proper waste disposal) should be pursued

together and monitored through joint inspections by labour and environmental authorities. Pilot programs can be introduced where model kilns showcase both eco-friendly technology and exemplary worker conditions, highlighting how these improvements reinforce each other (for instance, a well-ventilated, safer work environment improves workers' health and efficiency, which in turn complements the efficiency gains from cleaner technology). Adopting such clean and decent work practices supports Pakistan's commitments to multiple Sustainable Development Goals – notably SDG 3 (Good Health and Well-Being), SDG 5 (Gender Equality), SDG 8 (Decent Work and Economic Growth), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action). By institutionalizing cleaner production and WLC improvements in tandem, Punjab can greatly reduce the environmental footprint of its brick industry while also ensuring that workers benefit through healthier workplaces and greater productivity. Over time, these practices will help transform brick kilns into a cleaner, more humane industry that contributes to economic development without compromising on human rights or the environment.

***"Integrating cleaner production with fair labour practices enables the brick kiln sector to advance multiple Sustainable Development Goals simultaneously, demonstrating that environmental responsibility and workers' rights are mutually reinforcing."***



Eliminating bonded labour in Pakistan’s brick kiln sector requires a coordinated approach that addresses immediate risks, builds long-term resilience, and balances social, economic, and environmental priorities. The recommendations outlined here offer a clear roadmap: from urgent legal reforms and gender-sensitive oversight to sustainable technological upgrades and integrated worker protections. Success will depend on political will, adequate resourcing, and strong collaboration between government departments, civil society, and the private sector. By embedding labour rights, social protection, and environmental responsibility into the industry’s framework, Punjab can set a national precedent—proving that economic productivity and human dignity can advance together.









## Annex 1

# Complaints, FIRs and Legal Action, Related To Brick Kiln Workers (Human Rights) Violations

Sr.	District	Year	No. of complaints received about violation of human rights	No. of FIRs registered	No. of accused involved	No. of accused arrested	No. of cases challaned	No. of cases cancelled	No. of decided by courts	No. of accused convicted
1	Lahore	2021	4	4	4	4	3	1	0	0
		2022	2	2	2	2	2	0	0	0
		2023	2	2	2	2	0	2	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
2	Sheikhupura	2021	4	4	5	5	4	0	2	0
		2022	8	8	19	19	8	0	8	0
		2023	3	3	3	3	3	0	3	0
		2024	7	7	9	9	6	1	5	1
		2025	0	0	0	0	0	0	0	0
3	Nankana	2021	0	0	0	0	0	0	0	0
		2022	3	3	5	5	3	0	0	0
		2023	1	1	1	1	1	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	1	1	1	1	1	0	0	0
4	Kasur	2021	1	1	1	1	1	0	0	0
		2022	5	5	7	7	4	1	0	0
		2023	2	2	3	3	2	0	0	0
		2024	6	6	7	6	6	0	0	0
		2025	2	2	5	3	1	0	0	0
5	Gujranwala	2021	3	3	4	4	3	0	1	0
		2022	4	4	4	4	4	0	0	0
		2023	2	2	3	3	2	0	0	0
		2024	1	1	1	1	1	0	0	0
		2025	1	1	2	0	0	0	0	0
6	Sialkot	2021	0	0	0	0	0	0	0	0
		2022	7	7	10	10	7	0	1	1
		2023	1	1	2	2	1	0	0	0
		2024	2	2	4	3	2	0	0	0
		2025	0	0	0	0	0	0	0	0
7	Narowal	2021	1	1	1	1	1	0	1	1
		2022	10	10	12	12	12	0	10	12
		2023	1	1	1	1	1	0	1	1
		2024	3	3	3	3	3	0	3	3
		2025	0	0	0	0	0	0	0	0
8	Gujrat	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
9	Hafizabad	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
10	M.B.Din	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
11	Wazirabad	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0



Sr.	District	Year	No. of complaints received about violation of human rights	No. of FIRs registered	No. of accused involved	No. of accused arrested	No. of cases challaned	No. of cases cancelled	No. of decided by courts	No. of accused convicted
12	Rawalpindi	2021	1	1	1	1	1	0	0	0
		2022	9	9	9	8	9	0	0	0
		2023	10	10	11	10	10	0	0	0
		2024	8	8	8	7	7	0	0	0
		2025	0	0	0	0	0	0	0	0
13	Murree	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
14	Attock	2021	5	5	9	9	4	1	0	0
		2022	5	5	9	9	5	0	1	0
		2023	0	0	0	0	0	0	0	0
		2024	1	1	1	1	1	0	0	0
		2025	1	1	2	1	1	0	0	0
15	Jhelum	2021	0	0	0	0	0	0	0	0
		2022	1	1	1	1	1	0	1	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
16	Chakwal	2021	0	0	0	0	0	0	0	0
		2022	1	1	1	1	1	0	1	1
		2023	0	0	0	0	0	0	0	0
		2024	5	5	6	6	5	0	5	6
		2025	0	0	0	0	0	0	0	0
17	Sargodha	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
18	Khushab	2021	0	0	0	0	0	0	0	0
		2022	3	3	3	3	0	0	3	2
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
19	Mianwali	2021	0	0	0	0	0	0	0	0
		2022	4	4	8	8	4	0	0	0
		2023	3	3	7	7	3	0	0	0
		2024	2	2	2	2	2	0	0	0
		2025	0	0	0	0	0	0	0	0
20	Bhakkar	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
21	Faisalabad	2021	16	16	29	29	16	0	0	0
		2022	9	9	12	12	9	0	0	0
		2023	7	7	13	13	7	0	0	0
		2024	12	12	15	15	12	0	0	0
		2025	6	6	6	6	3	0	0	0
22	T.T.Singh	2021	2	2	2	2	2	0	1	0
		2022	7	7	7	7	7	0	3	2
		2023	9	9	9	9	9	0	5	5
		2024	9	9	9	9	9	0	2	1
		2025	4	4	4	2	2	0	0	0
23	Jhang	2021	8	8	16	16	8	0	3	6
		2022	1	1	2	2	1	0	1	2
		2023	5	5	5	5	5	0	2	2
		2024	4	4	4	4	4	0	1	1
		2025	6	6	6	4	4	0	0	0
24	Chiniot	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
25	Multan	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0



Sr.	District	Year	No. of complaints received about violation of human rights	No. of FIRs registered	No. of accused involved	No. of accused arrested	No. of cases challaned	No. of cases cancelled	No. of decided by courts	No. of accused convicted
26	Lodhran	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
27	Khanewal	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
28	Vehari	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
29	Sahiwal	2021	0	1	1	1	1	0	0	0
		2022	0	9	14	14	9	0	4	4
		2023	0	6	10	10	6	0	1	1
		2024	0	13	14	14	13	0	0	0
		2025	0	0	0	0	0	0	0	0
30	Okara	2021	4	4	5	5	4	0	0	0
		2022	1	1	1	1	1	0	0	0
		2023	12	12	12	11	12	0	0	1
		2024	1	1	1	1	1	0	0	0
		2025	2	2	2	2	2	0	0	0
31	Pakpattan	2021	0	1	1	1	1	0	0	0
		2022	0	1	1	1	1	0	1	1
		2023	0	2	3	3	2	0	1	1
		2024	0	0	0	0	0	0	0	0
		2025	0	2	2	2	2	0	0	0
32	D.G.Khan	2021	2	2	2	2	2	0	0	0
		2022	1	1	1	1	1	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
33	Rajanpur	2021	1	1	1	1	1	0	0	0
		2022	3	3	3	3	3	0	2	0
		2023	10	10	10	10	10	0	4	2
		2024	3	3	3	3	3	0	1	1
		2025	2	2	2	2	2	0	0	0
34	M.Garh	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	1	1	1	1	1	0	0	0
		2025	4	4	4	4	4	0	0	0
35	Layyah	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	0	0	0	0	0	0	0	0
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
36	Bahawalpur	2021	3	3	5	5	3	0	3	4
		2022	0	0	0	0	0	0	0	0
		2023	2	2	4	4	2	0	2	3
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
37	B.Nagar	2021	7	7	7	7	7	0	5	4
		2022	0	0	0	0	0	0	0	0
		2023	1	1	1	1	1	0	1	1
		2024	0	0	0	0	0	0	0	0
		2025	0	0	0	0	0	0	0	0
38	R.Y Khan	2021	0	0	0	0	0	0	0	0
		2022	0	0	0	0	0	0	0	0
		2023	2	2	4	4	2	0	0	2
		2024	3	3	4	4	3	0	0	2
		2025	0	0	0	0	0	0	0	0
Total Punjab		2021	62	64	94	94	62	2	16	15
		2022	84	94	131	130	92	1	36	25
		2023	73	81	104	102	79	2	20	19
		2024	68	81	92	89	79	1	17	15
		2025	29	31	36	27	22	0	0	0

## Annex 2

# District Wise Detail of DVC Meetings and Bonded Labour Complaints from June, 2024 to June, 2025

Division	District	No. of DVCs Held	Total No. of Complaints Received in DVCs from June,24 to June,25	Parties Names	No. of complaints regarding Recovery of Household Articles	No. of Complaints Regarding Bonded Labour	Complaints Regarding Peshgi and other miscellaneous matters	Pending Complaints
Lahore	Lahore	12	0	0	0	0	0	
	Sheikhupura	13	0	0	0	0	0	
	Kasur	13	12	1. Ishaq Masih VS Zeeshan Saeed, Al-Madina Brick, Bypass, Kasur. 2. Akram Masih VS Ghousia Bricks, Kasur 3. Ghulam Fatima VS Ameer-E-Millat Bricks, Nizam Pura Road, Kasur 4. M. Nawaz VS Ameer-E-Millat Bricks, Nizam Pura Road, Kasur 5. M. Hassan VS Madina Bricks, Chakk No. 58, Kot Radha Kishan, Kasur 6. Rashid Mashi VS Ch. Tanveer Bricks Company, Pattoki, Kasur 7. Wazeer Ali VS New Chawla Bricks, Kot Wakeel Wala, Kot Radha Kishan, Kasur 8. Nazeer Ahmad VS Pakistan Bricks Company, Habibabad Chunian Road, Sadda Ottar, Kasur 9. Javed Masih VS Ch. Tanveer Bricks Company, Pattoki, Kasur 10. M. Ramzan VS Al-Madina Bricks, Harchoki Cunian, Kasur 11. Muhammad Ramzan Vs Al Madina Bricks, Harchoki, Chunian, District Kasur. 12. Mst. Kaneez Bibi Vs Makkah Bricks Company, Jumber, Pattoki, District Kasur.	03	05	04	0
	Nankana Sb	10	0	0	0	0	0	0
Faisalabad	Faisalabad	12	01	As per DVC minutes, the complaint was redressed but detail of the complaint was not provided	0	0	01	0
	T.T.Singh	12	0	0	0	0	0	0
	Jhang	13	02	As per DVC minutes, 02 complaints of bonded labour were received and the bonded labourers were got free through legal action taken in this regard. No detail of parties has been provided.	0	02	0	0
	Chiniot	12	0	0	0	0	0	0



Division	District	No. of DVCs Held	Total No. of Complaints Received in DVCs from June,24 to June,25	Parties Names	No. of complaints regarding Recovery of Household Articles	No. of Complaints Regarding Bonded Labour	Complaints Regarding Peshgi and other miscellaneous matters	Pending Complaints
Rawalpindi	Rawalpindi	12	0	0	0	0	0	0
	Jhelum	11	0	0	0	0	0	0
	Attock	09	0	0	0	0	0	0
	Chakwal	12	0	0	0	0	0	0
Gujranwala	Gujranwala	02	0	0	0	0	0	0
	Gujrat	08	0	0	0	0	0	0
	Sialkot	13	0	0	0	0	0	0
	Hafizabad	05	0	0	0	0	0	0
	M.B.Din	09	0	0	0	0	0	0
	Narowal	08	0	0	0	0	0	0
Multan	Multan	12	0	0	0	0	0	0
	Vehari	13	01	1. Mr. Muhammad Sarwar VS Abdur Rehman, Ghosia Brick Kiln, Chakk No. 421 EB, Tehsil Burewala, District Vehari.	0	0	01	0
	Lodhran	13	0	0	0	0	0	0
	Khanewal	12	04	1. Mr.Ikhtiar VS Al-Qadir Bricks Company 2. Mst.Razia Mai VS Brick Kiln Owner 3. Mst.Zakia Bibi VS Brick Kiln Owner 4. Mr.Fayyaz Hussain VS Brick Kiln Owner	04	0	0	0
Bahawalpur	Bahawalpur	08	0	0	0	0	0	0
	R.Y.Khan	06	0	0	0	0	0	0
	Bahawalnagar	07	0	0	0	0	0	0
Sargodha	Sargodha	13	0	0	0	0	0	0
	Mianwali	13	0	0	0	0	0	0
	Khushab	13	0	0	0	0	0	0
	Bhakkar	11	0	0	0	0	0	0
D.G.Khan	D.G.Khan	10	0	0	0	0	0	0
	Muzaffargarh	10	0	0	0	0	0	0
	Rajanpur	10	0	0	0	0	0	0
	Layyah	10	0	0	0	0	0	0
Sahiwal	Sahiwal	10	0	0	0	0	0	0
	Okara	10	0	0	0	0	0	0
	Pakpattan	09	0	0	0	0	0	0
	Total:	376	20	20	7	7	6	0



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