



Submission to the UN Committee on Economic, Social and Cultural Rights (CESCR) on Water Insecurity and its Human Rights Impacts in Pakistan

National Commission for Human Rights, Pakistan

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1. Introduction and Purpose of the Submission

1. The National Commission for Human Rights (NCHR), Pakistan's A-status accredited National Human Rights Institution, submits this report to the Committee on Economic, Social and Cultural Rights (CESCR) on the impact of water insecurity on the rights to work, social security, food, housing and health. These impacts are not experienced equally. Existing socioeconomic inequalities shape both exposure to water-related shocks and the ability of communities to adapt and recover. Drawing on NCHR's monitoring work and other available evidence, the submission focuses on communities already experiencing poverty, exclusion and limited access to essential services.

2. The submission examines two illustrative contexts: water scarcity in Punjab and its implications for agricultural livelihoods and food security; and post-flood recovery in Sindh, particularly access to adequate housing, safe drinking water, sanitation and healthcare. Together, these cases demonstrate how water insecurity can reinforce existing socioeconomic inequalities and undermine the enjoyment of Covenant rights. While these two provinces provide the geographic focus, the challenges identified reflect broader concerns across Pakistan.

3. These pressures have acquired added urgency amid uncertainty surrounding the Indus Waters Treaty (IWT), which introduces a further element of unpredictability into Pakistan's long-term water planning and preparedness

2. Water Insecurity, Poverty and Regional Inequality

Relevant List of Issues: Poverty, inequality and regional disparities; adequate standard of living

Relevant ICESCR provisions: Articles 2(2), 11 and 12

2.1 Water Insecurity in Pakistan

4. Pakistan faces significant water-security challenges arising from pressure on freshwater resources, groundwater depletion, inadequate access to safe drinking water and increasingly severe climate-related shocks. Its dependence on the Indus River Basin for agriculture and livelihoods makes reliable water availability central to food security and economic stability. Recurrent drought, extreme heat and flooding are intensifying these pressures, which are further compounded by the instability surrounding the Indus Waters Treaty (IWT) following India's April 2025 announcement that it was placing the Treaty in abeyance. The implications of this development for preparedness and rights protection are addressed in Section 7.

5. Water insecurity in Pakistan is not limited to availability but extends to quality, accessibility and reliability. UNICEF reported in March 2023 that, even before the 2022 floods, Pakistan's drinking-water supply system covered approximately 92 per cent of the population, yet only 36 per cent of the water was considered safe for consumption.¹ The 2022 floods further exposed the vulnerability of existing water and sanitation infrastructure: more than 10 million people in flood-affected areas remained without access to safe drinking water six months after the disaster, while over 5.4 million people, including 2.5 million children, were compelled to rely exclusively on contaminated water from ponds and wells.² Although these figures reflect conditions in 2023, they demonstrate how climate-related disasters can compound existing deficiencies in essential services and expose affected populations to prolonged health risks.

2.2 Water Insecurity as an Inequality Issue

6. The human rights implications of water insecurity extend beyond aggregate national water availability to the unequal distribution of safe and reliable water across different populations. Geographic location,

¹UNICEF (2023). *More than 10 million people, including children, living in Pakistan's flood-affected areas still lack access to safe drinking water*. Press release, 21 March 2023.

² Ibid.

household income, land ownership and access to public infrastructure influence both exposure to water insecurity and the capacity of individuals and communities to respond to it.

7. Low-income households have fewer resources to secure alternative water supplies, absorb livelihood losses or recover from damaged housing and infrastructure. This turns unequal access to water into a wider inequality in the enjoyment of food, health, housing and livelihoods. Under Articles 11 and 12 of the ICESCR and General Comment No. 15, water governance must protect sufficient, safe and affordable water for essential needs without discrimination, with particular attention to disadvantaged communities.

8. General Comment No. 15 requires water and water facilities to be accessible without discrimination and cautions against water-resource allocation and investment that disproportionately benefits more privileged sections of the population.³ For Pakistan, this places equity at the centre of decisions on water allocation, infrastructure and public investment.

2.3 Human Rights Implications

9. Water is integral to the enjoyment of rights protected under Articles 11 and 12 of the ICESCR. It sustains food production and livelihoods and is an underlying determinant of health. General Comment No. 15 accordingly identifies access to a minimum essential amount of safe water for personal and domestic use as a core obligation, particularly for disadvantaged and marginalised groups.

10. NCHR's concern is therefore not only the growing pressure on Pakistan's water resources, but whether water governance, public services and social-protection systems protect people when that pressure translates into lost income, food insecurity, unsafe living conditions or threats to health. The measure of effective water governance must include whether minimum essential needs remain protected for those least able to absorb water-related shocks.

3. Punjab: Water Scarcity, Agricultural Livelihoods and Food Insecurity

Relevant List of Issues: Right to work; adequate standard of living; malnutrition and hunger; poverty and inequality; social security

Relevant ICESCR provisions: Articles 6, 7, 9 and 11

3.1 Agriculture and Dependence on Reliable Water

11. Agriculture remains central to Punjab's economy, employment and food production, making the province particularly vulnerable to disruptions in water availability. According to the World Bank, approximately 88 per cent of Punjab's cropped area is irrigated, and irrigated agriculture accounts for more than 90 per cent of the province's water withdrawals. Groundwater accounts for approximately 60 per cent of the water used by farmers for irrigation, placing considerable pressure on groundwater resources where canal supplies are insufficient or unreliable.⁴

12. Recent climatic conditions have demonstrated the vulnerability of this agricultural system. In March 2025, Pakistan's National Disaster Management Authority reported that Punjab had experienced a 38 per cent rainfall deficit between 1 September 2024 and 21 March 2025. Drought conditions persisted in the province's lower eastern plains, while low river flows and reduced water storage in the Tarbela and Mangla reservoirs raised concerns regarding agricultural production and drinking-water availability.⁵

³ UN Committee on Economic, Social and Cultural Rights (2002). *General Comment No. 15: The Right to Water (Arts. 11 and 12 of the Covenant)*, UN Doc. E/C.12/2002/11

⁴ World Bank (2022). *Punjab Resilient and Inclusive Agriculture Transformation Project (PRIAT): Project Appraisal Document*.

⁵ National Disaster Management Authority (2025). *Drought Conditions Emerging in Parts of the Country*, Drought Advisory-III, 25 March 2025.

13. These domestic pressures must now also be considered against growing unpredictability in transboundary water cooperation under the IWT. For an agricultural system heavily dependent on reliable irrigation supplies, reduced predictability in water planning risks compounding existing vulnerabilities, particularly for small farmers, tenant farmers and agricultural labourers with limited capacity to absorb production or income shocks.

14. The consequences of water scarcity are not experienced equally across the agricultural sector. Approximately 90 per cent of farmers in Punjab operate holdings of less than five hectares, collectively accounting for 58 per cent of the province's farmland.⁶ Small farmers, tenant farmers and agricultural labourers may have fewer resources to invest in alternative irrigation systems, absorb crop losses or sustain their livelihoods during prolonged periods of water insecurity. In contrast, larger landholders may have greater access to financial resources, irrigation infrastructure and alternative income sources. For NCHR, these disparities highlight the importance of examining water scarcity not solely in terms of agricultural productivity, but also through its consequences for rural poverty, economic inequality and the enjoyment of economic and social rights.

3.2 Water Scarcity, the Right to Work and the Right to Food

15. Water insecurity has significant implications for the right to work and the right to food, particularly in rural communities where employment and household food security depend directly or indirectly on agricultural production. Reduced or unpredictable irrigation supplies can disrupt cultivation, harvesting and other agricultural activities, reducing demand for seasonal and daily-wage labour. These disruptions affect not only farmers but also agricultural workers, tenant farmers, sharecroppers and households dependent on associated rural economic activities.

16. The vulnerability of agricultural employment is reflected in Pakistan's official labour statistics. According to the Pakistan Bureau of Statistics' Employment Trend Report 2025, approximately 87 per cent of agricultural employment in Punjab was classified as vulnerable employment in 2024–25, encompassing own-account workers and contributing family workers whose employment arrangements often provide limited income security and formal employment protection.⁷ Such employment structures leave agricultural households particularly exposed to water-related economic shocks. Where reduced agricultural activity results in fewer working days or lower household earnings, workers may have limited financial reserves or alternative employment opportunities.

17. Women working in agriculture face additional vulnerabilities. Their participation is frequently concentrated in informal or unpaid family work, while limited ownership of agricultural land can restrict their access to productive resources and agricultural support programmes. The Punjab Gender Parity Report 2023–2024 identifies significant gender disparities in agricultural land ownership and economic participation.⁸ Under Articles 6 and 7 of the ICESCR, the State is required to take appropriate measures towards the realisation of the right to work and the enjoyment of just and favourable conditions of work. In the context of water insecurity, this requires attention to the economic consequences of water-related disruptions for agricultural workers, particularly those whose employment is informal, seasonal or otherwise insecure.

18. Water insecurity also undermines the right to adequate food through two connected pathways: it affects agricultural production and food availability, and it reduces the income through which households purchase food. For small farmers and subsistence households, reduced production can directly diminish

⁶World Bank (2022). *Punjab Resilient and Inclusive Agriculture Transformation Project (PRIAT): Project Appraisal Document*.

⁷ Pakistan Bureau of Statistics (2025). *Employment Trend Report 2025*, Table 4.21.

⁸ Punjab Commission on the Status of Women. *Punjab Gender Parity Report 2023–2024*.

household food supplies. For agricultural labourers and other low-income households, fewer working days and lower earnings reduce purchasing power and make sufficient, nutritious food harder to afford.

19. These risks arise against a broader national context of food insecurity and malnutrition. The World Food Programme reports that approximately 20.7 per cent of Pakistan's population is undernourished, while 40 per cent of children under five experience stunting.⁹ Under Article 11 of the ICESCR, the right to adequate food encompasses both the availability of food and its economic and physical accessibility. The Committee's General Comment No. 12 further recognises that the realisation of this right requires sustainable access to food and the protection of the resources necessary for food production.¹⁰ NCHR emphasises that water insecurity must therefore be examined not only as a threat to agricultural productivity, but also as a potential driver of household food insecurity.

3.3 Social Protection and Resilience

20. The economic consequences of water scarcity underscore the importance of social protection for households dependent on climate-sensitive and water-dependent livelihoods. Pakistan has established several social-protection and agricultural support mechanisms. The Benazir Income Support Programme (BISP) provides cash assistance to eligible low-income households, while the Benazir Nashonuma Programme supports maternal and child nutrition through conditional cash transfers and associated health and nutrition services. In July 2026, BISP, WFP, UNICEF and WHO announced a three-year extension of the Nashonuma Programme, intended to reach an additional 3.3 million women and children across Pakistan.¹¹ At the provincial level, the Government of Punjab has introduced the Chief Minister's Punjab Kissan Card, which provides eligible farmers with access to interest-free agricultural loans. However, eligibility is linked to landholding and verification of land records, raising questions regarding the extent to which landless agricultural labourers, tenant farmers and other workers without documented land ownership can benefit.¹²

21. Existing measures do not fully address the specific income losses caused by drought, water shortages and reduced seasonal agricultural employment. Landless labourers, tenant farmers, informal and seasonal workers, women agricultural workers and households without alternative income are particularly exposed. NCHR considers that social protection must be capable of responding to these water- and climate-related livelihood shocks, rather than leaving assistance dependent primarily on land ownership or general poverty targeting.

4. Sindh: Post-Flood Recovery, Housing, Water and Health

Relevant List of Issues: Adequate standard of living; right to health; poverty and regional disparities

Relevant ICESCR provisions: Articles 11 and 12

4.1 Continuing Effects of Flooding

⁹ World Food Programme. *Pakistan: Country Overview*.

¹⁰ UN Committee on Economic, Social and Cultural Rights (1999). *General Comment No. 12: The Right to Adequate Food (Article 11)*, UN Doc. E/C.12/1999/5.

¹¹ World Food Programme (2026). *BISP, WFP, WHO, UNICEF Extend Partnership to Protect 3.3 Million Children and Women from Malnutrition in Pakistan*, 9 July 2026.

¹² Government of Punjab. *Chief Minister's Punjab Kissan Card Scheme*.

22. Sindh accounted for approximately 70 per cent of Pakistan's flood-related damages and economic losses in 2022, with almost 1.7 million homes partially damaged or destroyed.¹³ The floods also damaged agricultural land, irrigation infrastructure and essential public services.

23. NCHR's post-flood assessment, *When It Rains...: The 2022 Floods and Challenges for Vulnerable Communities in Sindh* (2023), documented significant gaps in the protection of affected communities. The assessment found that specific protection measures had not been adopted for several groups, including pregnant women, female-headed households, persons with disabilities, unaccompanied children, transgender persons, scheduled castes and religious minorities. It also documented the exclusion of landless tenants' mud houses from damage assessment and compensation, and of landless sharecroppers from seed relief.

24. NCHR's findings show that pre-existing inequality shaped access to relief itself. Land tenure, documentation, disability, gender and social identity affected whether some households were visible to assessment systems and able to benefit from assistance. Reconstruction must therefore be designed to reach people who are most easily excluded, including households without formal land ownership or documentation.

25. Reconstruction efforts have since made substantial progress. The Government of Sindh established the Sindh People's Housing for Flood Affectees (SPHF) programme to support the reconstruction of approximately 2.1 million homes through a beneficiary-driven approach. According to the Government of Sindh's Citizens' Budget 2025–26, 560,000 houses had been completed, while more than 1.2 million were under construction. The programme had also distributed over 300,000 land titles, prioritising women as legal landowners.¹⁴ These measures represent important progress. Nevertheless, the scale of the reconstruction programme demonstrates that recovery extends well beyond the immediate aftermath of the disaster. Housing reconstruction must also be accompanied by the restoration of drinking-water supplies, sanitation, drainage, healthcare and livelihood opportunities.

26. The floods also caused extensive damage to agriculture and rural livelihoods. More than 4.4 million acres of agricultural land were damaged in Sindh, while irrigation and flood-protection infrastructure serving more than half a million farmers was severely affected.¹⁵ For households dependent on agriculture and livestock, the loss of productive assets and employment compounds the economic consequences of displacement and inadequate housing. For NCHR, the central concern is therefore whether reconstruction and recovery efforts are translating into the restoration of essential services and the effective enjoyment of economic and social rights, particularly for communities that were already experiencing poverty and limited access to public infrastructure before the floods.

4.2 Right to Adequate Housing

27. Under Article 11 of the ICESCR, the right to adequate housing extends beyond the provision of physical shelter. The Committee's General Comment No. 4 identifies several essential elements of adequate housing, including security of tenure, habitability, accessibility and access to basic services such as safe drinking water, sanitation, drainage and energy.¹⁶

28. In Sindh, the reconstruction of flood-damaged housing provides an important opportunity to address pre-existing deficiencies in housing quality and access to essential services. The SPHF programme

¹³ World Bank, Asian Development Bank, European Union, United Nations and Government of Pakistan (2022). *Pakistan Floods 2022: Post-Disaster Needs Assessment*.

¹⁴ Government of Sindh, Finance Department (2025). *Sindh's Citizens' Budget 2025–26*, p. 28.

¹⁵ World Bank (2022). *Factsheet: Sindh Flood Emergency Rehabilitation Project*, 19 December 2022.

¹⁶ UN Committee on Economic, Social and Cultural Rights (1991). *General Comment No. 4: The Right to Adequate Housing (Article 11(1))*, UN Doc. E/1992/23.

incorporates climate-resilient construction and measures to strengthen housing security, including the provision of land titles to women. The World Bank-supported Sindh Flood Emergency Housing Reconstruction Project also provides for rainwater-harvesting systems and household latrines, while additional financing approved in December 2024 included provisions to improve housing accessibility for persons with disabilities.¹⁷

29. Housing recovery cannot be measured by construction alone. A rebuilt dwelling without reliable safe water, sanitation, drainage and essential services remains inadequate and can continue to expose its occupants to health risks. In flood-prone areas, waterlogging, damaged drainage and contaminated water sources directly affect habitability. Landless families, informal occupants and women without property documentation also face barriers to reconstruction assistance that must be addressed as part of the right to adequate housing.

30. NCHR therefore considers the relevant measure of recovery to be whether affected households have regained safe, habitable and accessible housing, secure tenure and the essential services required for an adequate standard of living - not simply the number of houses constructed.

4.3 Water, Sanitation and the Right to Health

31. The 2022 floods exposed significant vulnerabilities in Pakistan's water, sanitation and healthcare infrastructure, with particularly severe consequences for affected communities in Sindh. More than 10 million people across Pakistan's flood-affected areas remained without access to safe drinking water six months after the disaster, while more than 5.4 million people, including 2.5 million children, were relying exclusively on contaminated water from ponds and wells.¹⁸ The destruction of water-supply systems, inadequate sanitation and prolonged waterlogging created conditions conducive to water- and vector-borne diseases. The World Health Organization documented outbreaks and increased risks of diarrhoeal diseases, malaria, dengue and other infectious diseases in flood-affected areas, alongside disruptions to essential healthcare services.¹⁹

32. The consequences of inadequate water and sanitation are particularly significant for women and children. Unsafe drinking water and poor sanitation increase exposure to preventable illness, while diarrhoeal disease and inadequate nutrition can compound existing risks of malnutrition among children. Pregnant women and mothers may face additional challenges where damaged infrastructure, displacement and inadequate transport restrict access to maternal and reproductive healthcare.

33. Article 12 of the ICESCR protects not only access to healthcare but also the underlying determinants of health, including safe water, sanitation, adequate food and housing. In Sindh, this means that restoring health after the floods requires more than emergency medical response. Safe drinking water, functioning sanitation and drainage, and accessible healthcare must form part of the recovery itself if preventable disease is to be reduced rather than repeatedly treated after it occurs.

4.4 From Emergency Response to Long-Term Rights Protection

34. The Government of Sindh's Citizens' Budget 2025–26 reported an allocation of PKR 17.14 billion for water, sanitation and hygiene interventions across 3,200 villages, intended to benefit approximately 1.2 million people.²⁰ However, the transition from emergency relief to long-term recovery requires continued

¹⁷ World Bank (2022; 2024). *Sindh Flood Emergency Housing Reconstruction Project* factsheet, 19 December 2022; and *Pakistan: World Bank Approves \$450 Million Additional Financing to Further Support Resilient Reconstruction*, 24 December 2024.

¹⁸ World Health Organization (2022). *WHO reporting on the health consequences of Pakistan's 2022 floods*.

¹⁹ Ibid.

²⁰ Government of Sindh, Finance Department (2025). *Sindh's Citizens' Budget 2025–26*

assessment of whether affected communities have regained access to the conditions necessary for an adequate standard of living and the enjoyment of the right to health. For households experiencing prolonged displacement, delayed reconstruction or inadequate access to essential services, the consequences of flooding may extend beyond the initial disaster.

35. NCHR considers recovery effective only when it produces measurable improvements in the living conditions of affected communities. Reconstruction outputs are important, but they do not by themselves establish that people have regained adequate housing, safe water, sanitation, healthcare or livelihoods. Long-term recovery must therefore be assessed against these rights outcomes, particularly for communities facing multiple forms of socioeconomic disadvantage.

5. Disproportionate and Exclusionary Effects of Water Insecurity

Relevant List of Issues: Discrimination; gender inequality; poverty and regional disparities; protection of children

Relevant ICESCR provisions: Articles 2(2) and 3, read with Articles 6, 9, 11 and 12

5.1 Poverty and Economic Status

36. Water insecurity deepens existing economic disadvantage. In Punjab, small farmers, tenant farmers and agricultural labourers face livelihood losses when irrigation becomes unreliable. In Sindh, low-income flood-affected households face the combined costs of rebuilding, obtaining safe water and accessing healthcare. For households already living close to subsistence, these pressures directly compete with spending on food, health and other essential needs.

37. Households with sufficient financial resources may be better positioned to invest in alternative water supplies, storage facilities, private healthcare or alternative sources of income. By contrast, economically disadvantaged households may be compelled to reduce expenditure on food, healthcare and other essential needs to meet the additional costs associated with water insecurity. These disparities demonstrate how water insecurity can reinforce existing patterns of poverty and socioeconomic inequality.

5.2 Women and Girls

38. Women and girls may experience distinct and disproportionate consequences of water insecurity due to existing gender inequalities, unequal access to productive resources and their responsibilities for household water collection and unpaid care work. According to UNICEF, women and girls are responsible for collecting water in seven out of ten households without water supplies on the premises worldwide.²¹ Where safe water is unavailable within or near the home, the additional time required for water collection can increase unpaid domestic responsibilities and limit opportunities for education, employment and other activities.

39. In Punjab, women engaged in agricultural work may face additional economic insecurity when water shortages disrupt agricultural production and employment. Limited access to land ownership, agricultural financing and formal employment protections can further constrain their ability to adapt to livelihood disruptions. In Sindh, inadequate access to safe drinking water, sanitation and healthcare in flood-affected communities can create additional challenges for women and girls, particularly during pregnancy and menstruation. The absence of accessible and private sanitation facilities may also affect personal safety, dignity and health, particularly in displacement settings. These concerns engage Article 3 of the

²¹ UNICEF and WHO (2023). *Progress on Household Drinking Water, Sanitation and Hygiene 2000–2022: Special Focus on Gender*.

ICESCR, which requires States to ensure the equal enjoyment of economic, social and cultural rights by men and women.

5.3 Children

40. Children are particularly vulnerable to the health and nutritional consequences of inadequate access to safe drinking water, sanitation and food. The 2022 floods demonstrated the scale of these risks: approximately 2.5 million children in Pakistan's flood-affected areas were relying exclusively on contaminated water from ponds and wells six months after the disaster.²² Unsafe drinking water and inadequate sanitation increase exposure to diarrhoeal and other water-borne diseases, while recurrent illness can contribute to malnutrition and adversely affect children's growth and development.

41. Water-related livelihood disruptions can also affect children indirectly through declining household income and reduced access to adequate food, healthcare and education. In agricultural households, the loss of employment or crop production may place additional pressure on household resources, potentially increasing children's vulnerability to food insecurity and other forms of deprivation. For NCHR, protecting children from the consequences of water insecurity requires particular attention to access to safe drinking water, adequate nutrition, sanitation and essential healthcare, especially in low-income and flood-affected communities.

5.4 Other Groups Facing Heightened Vulnerability

42. Water insecurity can create additional barriers for persons with disabilities, landless agricultural workers, tenant farmers, informal workers and communities living in remote or underserved areas. Persons with disabilities may face physical barriers to accessing water points, sanitation facilities, emergency shelters and healthcare services, particularly where infrastructure has been damaged by flooding. Inadequate consideration of accessibility in reconstruction and water-service delivery can further restrict their ability to enjoy essential services on an equal basis with others.

43. Landless agricultural labourers and tenant farmers may experience livelihood disruptions without having the same access to land-based agricultural assistance, irrigation infrastructure or financial resources as landowners. Similarly, households in remote rural communities may face additional difficulties obtaining safe drinking water, healthcare and emergency assistance where public infrastructure and service delivery are inadequate.

44. NCHR's post-flood assessment in Sindh documented that assistance distribution was marked by political-affiliation-based discrimination in some instances. In one reported case in Shaheed Benazirabad, scheduled-caste families were accommodated in school corridors while Muslim families received rooms.²³ The assessment also found that government and aid agencies did not meaningfully consult vulnerable communities before launching relief operations. Under Article 2(2) of the ICESCR, States are required to guarantee the exercise of Covenant rights without discrimination. The Committee's General Comment No. 20 further recognises that substantive equality requires attention to the circumstances of individuals and groups who experience disadvantage, including through measures that address structural and systemic inequalities.²⁴

45. NCHR's findings demonstrate that water insecurity and climate-related disasters do not create vulnerability in isolation; they magnify inequalities that already determine who has resources, documentation, infrastructure and access to assistance. Rights-based water management and disaster

²² UNICEF (2023). *More than 10 million people...*, 21 March 2023.

²³ National Commission for Human Rights (Sindh) & The Knowledge Forum (2023). *When It Rains...: The 2022 Floods and Challenges for Vulnerable Communities in Sindh*. April 2023.

²⁴ UN Committee on Economic, Social and Cultural Rights (2009). *General Comment No. 20: Non-discrimination in Economic, Social and Cultural Rights*, UN Doc. E/C.12/GC/20.

recovery must therefore identify and address these unequal starting points rather than assume that uniform measures will reach all communities equally.

6. Governance, Social Protection and Protection of Minimum Essential Needs

Relevant List of Issues: Public expenditure and regional disparities; right to social security; adequate standard of living; right to health

Relevant ICESCR provisions: Articles 2(1), 9, 11 and 12

6.1 Prioritising Essential Human Needs

46. Pakistan's National Water Policy (2018) recognises access to safe and affordable drinking water as a fundamental human right and places drinking water and sanitation at the highest level of priority among competing water uses, followed by irrigation. The policy provides a national framework for water governance while recognising the responsibilities of provincial governments for irrigation, agriculture and water-supply services.²⁵

47. The gap between policy commitment and lived access remains substantial. United Nations SDG data indicate that only 45 per cent of Pakistan's population used safely managed drinking-water services in 2024. During scarcity, water-allocation decisions must therefore protect essential domestic needs and ensure that disadvantaged communities do not bear a disproportionate share of shortages in safe water, sanitation, food security and other determinants of health.

6.2 Coordination, Data and Identification of Affected Populations

48. Responsibility for water, agriculture, drinking-water supply, health and disaster management is divided across federal, provincial and local institutions. When these systems operate separately, households can experience the same water shock simultaneously as a livelihood, food-security, health and housing crisis. Effective rights protection therefore requires coordination across these sectors, with clear responsibility for identifying and responding to overlapping deprivations.

49. That coordination depends on reliable, regularly updated and disaggregated data. Aggregate national and provincial figures can conceal sharp differences between districts, rural communities, informal settlements and households facing multiple disadvantages. Linking data on water access with employment, food insecurity, disease and post-disaster recovery would make it possible to identify where water insecurity is producing the most serious human-rights consequences and target resources accordingly.

50. NCHR's post-flood assessment found that government data gaps were a significant obstacle to targeted relief. In particular, the absence of data on newborns, persons with disabilities and older persons meant that relief could not be directed to those with specific needs.²⁶ NCHR considers that monitoring should extend beyond infrastructure coverage and agricultural production to include the human-rights outcomes of water insecurity, with data disaggregated by geography, sex, age, disability and socioeconomic status. Particular attention should be given to identifying households experiencing overlapping deprivations in water access, livelihoods, housing, food security and health.

6.3 Social Protection

51. Pakistan has established social-protection mechanisms that provide assistance to households affected by poverty and climate-related disasters. Following the 2022 floods, the Benazir Income Support

²⁵ Government of Pakistan, Ministry of Water Resources (2018). *National Water Policy*.

²⁶ National Commission for Human Rights (Sindh) & The Knowledge Forum (2023). *When It Rains...: The 2022 Floods and Challenges for Vulnerable Communities in Sindh*. April 2023.

Programme (BISP) provided emergency cash assistance of PKR 25,000 per eligible household. By 22 September 2022, approximately 52.25 million flood-affected families had received assistance, including more than 832,000 families in Sindh.²⁷ At the provincial level, the World Bank-supported Sindh Flood Emergency Rehabilitation Project incorporated a community-level cash-for-work programme intended to provide short-term income support to approximately 100,000 households.²⁸

53. Emergency cash assistance demonstrates the importance of social protection after a disaster, but one-off relief does not address recurring livelihood losses caused by drought, water scarcity and flooding. Landless labourers, tenant farmers, informal and seasonal workers and women in unpaid or informal agricultural work are especially likely to fall outside employment-based protection or land-linked assistance. NCHR therefore considers shock-responsive social protection essential to preventing a water or climate shock from becoming a longer-term poverty and food-security crisis.

6.4 Participation and Accountability

54. Meaningful participation and accessible accountability mechanisms are essential to ensuring that water-management and reconstruction programmes respond to the needs of affected communities. Pakistan's National Water Policy recognises equity and participatory decision-making as guiding principles of water governance. In Sindh, the World Bank-supported housing reconstruction programme incorporates community engagement through village reconstruction committees, while the Sindh Flood Emergency Rehabilitation Project has established a grievance-redress mechanism for project-related complaints.²⁹

55. The existence of participatory and grievance mechanisms is not sufficient unless affected communities can actually use them. NCHR's post-flood assessment found that affected persons lacked effective complaint mechanisms and that vulnerable communities were not meaningfully consulted before relief operations. Accountability therefore requires accessible information, inclusive participation, timely resolution of complaints and remedies that are available in practice, including to women, persons with disabilities, landless households and other groups at heightened risk of exclusion.

7. Emerging Pressures and the Need for Greater Water Security

Relevant List of Issues: Contextual and cross-cutting concerns relating to the rights to an adequate standard of living and health

Relevant ICESCR provisions: Articles 2, 11 and 12

7.1 Climate Change, Water Security and Transboundary Uncertainty

56. Climate change is making Pakistan's water environment more volatile through variable rainfall, prolonged drought, extreme heat and recurrent flooding, while groundwater depletion reduces the buffer available when surface-water supplies become unreliable³⁰. These pressures are already relevant to the rights examined in this submission: they affect whether agricultural livelihoods can be sustained, whether households can obtain adequate food and safe water, and whether communities can recover from repeated climate shocks. Water governance, climate adaptation and disaster

²⁷ Benazir Income Support Programme (2022). *BISP Ensuring Speedy Disbursement of Rs. 25,000 to Flood-Affected Families*, 22 September 2022.

²⁸ World Bank (2022). *Pakistan: World Bank Approves \$1.692 Billion for Five Projects to Support the People of Sindh in the Flood-Affected Areas*, 19 December 2022.

²⁹ Government of Sindh, *Sindh Flood Emergency Rehabilitation Project: Grievance Redress Mechanism*.

³⁰ World Bank (2019). *Pakistan: Getting More from Water*.

preparedness must therefore be treated as part of the protection of economic and social rights, not as separate environmental concerns.

57. The uncertainty surrounding the Indus Waters Treaty (IWT), following India's April 2025 announcement that it was placing the Treaty in abeyance, adds another layer of unpredictability to Pakistan's long-term water planning. The Court of Arbitration established under the Treaty has stated that the Treaty remains in force and that its obligations cannot be unilaterally suspended. The Treaty itself provides for its continuation until terminated through a duly ratified agreement between both States. Without assuming any future disruption to water flows, reduced predictability in transboundary cooperation complicates agricultural planning, water management and preparedness³¹. The issue extends beyond contingency planning. The stability of treaty-based water cooperation is itself important to long-term water security. International treaties cannot simply be set aside through unilateral declaration outside the terms of the treaty and the applicable rules of international law. The IWT has provided the framework for the management of the Indus waters between India and Pakistan for more than six decades. For communities already facing food insecurity, fragile livelihoods and inadequate access to safe water, this compounds existing risks and strengthens the need to protect minimum essential needs.

8. NCHR Conclusion and Recommendations

8.1 Conclusion

58. Water insecurity in Pakistan is not merely an environmental or resource-management challenge but a cross-cutting human rights concern that affects the enjoyment of several rights guaranteed under the ICESCR. As demonstrated by the experiences of Punjab and Sindh, water scarcity, climate-related disasters and inadequate access to safe water and sanitation can undermine agricultural livelihoods, household food security, adequate housing and health.

59. These vulnerabilities are likely to become more difficult to manage as climate change increases water variability and developments surrounding the IWT place additional pressure on long-term water planning and preparedness.

60. NCHR emphasises that water insecurity can operate as a multiplier of existing socioeconomic inequalities. Its consequences are particularly significant for low-income households, women, children, persons with disabilities and communities with limited access to essential services or resources to adapt and recover. While Pakistan has adopted important policy commitments and undertaken substantial recovery and rehabilitation initiatives, sustained attention is required to ensure that these measures translate into equitable access to essential services and the effective enjoyment of economic, social and cultural rights.

8.2 Recommendations

In light of the foregoing, NCHR recommends that the Government of Pakistan, in coordination with provincial authorities:

1. **Adopt a rights-based approach to water governance and climate adaptation**, explicitly integrating the rights to food, health, work and an adequate standard of living into water-allocation decisions, agricultural planning, disaster preparedness and recovery programmes, with priority given to communities experiencing socioeconomic disadvantage.

³¹ Ministry of Foreign Affairs, Government of Pakistan (2026). *Transcript of the Press Briefing by the Spokesperson*, 2 September 2026.

2. **Ensure minimum essential access to sufficient, safe, physically accessible and affordable water** for personal and domestic use, particularly during periods of scarcity and disaster.
3. **Strengthen protection of water-dependent livelihoods**, including through improved access to climate-resilient agricultural practices, irrigation support and livelihood assistance for small farmers, tenant farmers, agricultural labourers and other economically vulnerable workers, and integrate food-security and livelihood assessments into water management and drought planning.
4. **Expand shock-responsive social protection** for households affected by water scarcity, drought and flooding, particularly informal and seasonal agricultural workers, landless labourers and women whose contributions to agricultural livelihoods may not be adequately recognised within existing support mechanisms.
5. **Accelerate rights-based post-flood recovery**, ensuring that housing reconstruction is accompanied by reliable access to safe drinking water, sanitation, drainage, healthcare and other essential services, with particular attention to households experiencing prolonged displacement or barriers to reconstruction assistance, including landless families, female-headed households and persons with disabilities.
6. **Strengthen water, sanitation and hygiene (WASH) infrastructure and public-health preparedness** in flood-prone and water-stressed communities, including measures to prevent water- and vector-borne diseases and maintain access to essential healthcare during climate-related emergencies.
7. **Improve the collection and use of disaggregated data** on access to safe water, sanitation, food insecurity, livelihood disruptions, health outcomes and post-disaster recovery, disaggregated by geography, sex, age, disability and socioeconomic status, to identify populations experiencing overlapping deprivations.
8. **Strengthen intergovernmental coordination, community participation and accountability** across water, agriculture, health, social-protection and disaster-management institutions, including accessible complaints and redress mechanisms to ensure that affected communities, particularly women, persons with disabilities, landless households and other marginalised groups, can participate meaningfully in decisions concerning their rights and essential needs.
9. **Uphold treaty-based water cooperation and strengthen preparedness** by supporting the continued operation of the Indus Waters Treaty in accordance with its provisions and applicable international law, while strengthening national contingency planning to protect minimum essential water needs, food security, livelihoods and public health.