



REFUGEE SOLIDARITY
NETWORK



CLYDE & Co
Successful risk navigation

Climate Displacement in Pakistan

A Review of Law, Policy, and Comparative Contexts

November 2025



Authors

Clyde & Co LLP: Lucia Williams, Georgina Gorvin and Anna Denison. With thanks to Sarah Clover, Caroline Loving, William Ferris, Rebecca Kiiza and Alex Ogonyanwo

Clyde & Co is a global law firm providing a complete service to clients in its core sectors of insurance, transport, energy, infrastructure and trade & commodities. From developed to emerging markets, Clyde & Co supports its clients by putting the power of a globally integrated firm at their disposal with a range of seamless and efficient services and the very best, commercially minded, legal advice. Since 2016, Clyde & Co has developed a Climate Change Risk and Resilience Practice, engaging with other thought leaders and guiding clients on the risks of climate change to financial markets and the opportunities brought about by the transition to a sustainable economy. Clyde & Co's practice includes regulatory, consultancy, risk assessment and monitoring work, drawing on an international network and deep subject-matter expertise in the firm's core sectors. We deliver strategic advice to clients on climate, biodiversity and wider environmental liability risks. Please note, however, that this report does not constitute legal advice. Advice of local counsel should be sought in relation to any questions of Pakistani law raised in this report.

Refugee Solidarity Network (RSN): Zaid Hydari, Executive Director

Refugee Solidarity Network (RSN) is a US-based non-profit organization working to protect the rights of displaced persons by strengthening legal frameworks and institutional capacities through partnership, research, and advocacy.

RSN has supported programming in Türkiye since 2015, enabling the provision of free-of-charge legal assistance programming for asylum-seekers, while co-creating a number of information platforms for affected communities and capacity-building tools for practitioners. RSN has been involved in refugee issues in Pakistan for many years, including by facilitating South-South knowledge-sharing and regional dialogue on refugee response with *Undoing Precarity: Elevating Positive Practices for Refugee Protection in South and South East Asia*¹ and with *Considering the Protection Needs of Afghan Refugees in a Regional Context: Pakistan, Iran and Turkey*².

Climate REACH: Ahmad Shabbar, Founding CEO

Climate REACH is a pioneering initiative dedicated to empowering people across Pakistan and beyond to tackle the pressing issue of climate change. Our motto is: Our Entire Planet Within REACH. We're on a mission to bridge the gap between knowledge and action in the fight against environmental challenges.

At the heart of Climate REACH's strategy is a comprehensive approach encompassing Research, Education, Advocacy, Community, and Harmony. We're committed to harnessing scientific research and data to better understand climate change, weaving in indigenous wisdom and tailored educational efforts to foster climate literacy among the wider population. Our advocacy work is aimed at championing sustainable practices and policies, cultivating a sense of community among those affected by and fighting against climate change, and ultimately striving for a world where we can all live in harmony, free from existential threats.

¹ RSN, (2021). 'Undoing Precarity: Elevating Positive Practices for Refugee Protection in South and South East Asia – Bangladesh'. at: <https://reliefweb.int/report/bangladesh/undoing-precarity-elevating-positive-practices-refugee-protection-south-and-south-east-asia> [Accessed 10 November 2025]

² RSN (n.d.). 'Considering the Protection Needs of Afghan Refugees in a Regional.' at: <https://refugeesolidaritynetwork.org/wp-content/uploads/2022/10/AfghanRefugees-1.pdf> [Accessed 10 November 2025]

Acknowledgments:

This Report has benefited from input by the following experts, to which the authors are grateful:

Dr Nausheen Anwar, Urban Climate Resilience Lead and Principal Researcher, International Institute for Environment and Development (IIED)

Dr Nidhi Nagabhatla, Senior Research Fellow and Cluster Coordinator for the Nature, Climate and Health programme at the United Nations University Institute on Comparative Regional Integration Studies (UNU-CRIS)

Dr Sanae Okamoto, Senior Researcher, United Nations University - Maastricht Economic and Social Research Institute on Innovation and Technology (UNU-MERIT)

Suggested Citation:

Refugee Solidarity Network, Climate REACH, Clyde & Co LLP, *Climate Displacement in Pakistan: A Review of Law, Policy, and Comparative Contexts* (2025).

Cover image:

Ahmad Shabbar ©2022, Kashmir Kot / Rojhan Jamali, District Jaffarabad, Balochistan Province

Image Title: Walking on Water: Miracle? Or the Resilience of the Climate Migrant?

Comment:

"This image is extremely important to me as it's from my village in Balochistan in the immediate aftermath of the 2022 floods that devastated Southern Pakistan. I took this photo on the road my extended family's homes in Kashmir Kot / Rojhan Jamali, District Jaffarabad, Balochistan Province. Entire farmlands submerged in water. Fish swimming where there were crops to be harvested.

I was in the city while the actual flooding happened and was only able to reach the village after a month, once the water had receded a bit. While many of the villagers, my brethren, had already left, there were still a few left behind, making their way to drier areas or to towns and cities. Walking on water. Though that wasn't the miracle, their resilience and survival was.

They had been trapped in their homes until they could find a silhouette of the submerged road. The land on either side of the road is farm land and about 4-8 ft lower than the road in several places. Seeing this imagery in person, it felt claustrophobic even as I stood in the open air. People were either trapped in by the water, or had to travel for miles over several hours to the nearest dry land. I can't even begin to imagine what it must've been like when the flooding was at its peak and the road itself was drowned by 4-5 ft of water."

- Ahmad Shabbar

Table of Contents

1	Foreword	1
2	Executive summary	2
3	Introduction	4
	3.1 What is Climate Displacement?	4
	3.2 How is Pakistan Affected by Climate Displacement?	5
	3.3 Pakistan's Approach to Climate Displacement	8
4	National Adaptation Plan Pakistan 2023	11
	4.1 Overview of the NAP	11
	4.2 The NAP and Climate Displacement	13
	4.3 NAP Adaptation Priorities	14
5	The Sindh Resettlement & Rehabilitation Policy	19
	5.1 Overview of the Sindh Resettlement & Rehabilitation Policy	19
	5.2 Legal Framework	20
	5.3 Key Provisions of the R&R Policy	20
	5.4 Entitlement for Displacement	21
	5.5 Resettlement	22
	5.6 Implementation of the R&R Policy	22
	5.7 Criticisms	23
	5.8 Additional Areas to Consider	23
	5.9 Relationship between the R&R Policy and the NAP	24
6	Review of the Wider International Climate Displacement Policy Landscape	25
	6.1 Relevant International Agreements	25
	6.2 Examples of Relevant Comparative Frameworks	26
7	Way Forward	30

1 Foreword

“We had no intention or interest to leave our home, we became displaced due to floods, every time we borrow money to build a house, floods destroy them. We can’t build a home, and we have nothing to do back in our villages. If we go back, we have to repay the loan which was increased when our crops were destroyed. Plus, no other facilities are there. We were told that the government would give 3 lakh rupees to flood affectees, yet we barely see people who are given the complete amount for constructing homes. We want to go back, but we have no resources to do so.”

IDP living in Dadu, displaced during 2022 floods

The 2005 earthquake, followed by historic floods in 2010 and 2022 - heatwaves and droughts in between - we have watched and experienced nature take its course and witnessed and contributed to the response of government, philanthropy, and private citizenry to help ease the suffering of so many.

As we assessed the changes in response to each successive natural hazard, we identified a lack of focus and attention on displacement resulting from these precipitating events. As rights-based advocates we observed how positive steps were taken in the form of policies at the federal and provincial levels. Yet we also noted with concern that such official response plans failed to recognize the needs of the displaced, especially their legal protection concerns.

Climate REACH, drawing on its founder’s direct involvement in various public and environmental interest litigation from within Pakistan, and RSN building on its experience addressing the complexities facing major refugee hosting countries, including Pakistan, committed to work on this issue.

In late 2024 RSN and Climate REACH began field research, interviewing climate displaced communities in 3 key locations in Sindh. The interviews conducted revealed a precarious living situation for communities displaced as long as 14 years ago. This initiative led us to an examination of official policy, identifying the Sindh Rehabilitation and Resettlement Plan and the National Adaptation Plan as key components of Pakistan’s efforts to formalize a response to climate disaster. Yet our initial review further confirmed our concern that the issue of displaced communities was not being given due attention.

We were fortunate to find Clyde & Co LLP willing to support us with further review of these policies and the identification of comparative practices. This report is a positive example of cooperation, bringing an environmental NGO and rights-based organizations focusing on displacement together with a private law firm. In this way, we mend local/grassroots efforts with diaspora and international ones, strengthening our individual capacities.

We recognize this report as one modest output among existing initiatives by peers to advance reforms. We hope the findings can be integrated into civil society dialogue at the national and regional level and look ahead with measured hope that those uprooted from their homes find protection and the security needed to rebuild their lives.

Zaid Hydari, RSN

Ahmad Shabbar, Climate REACH

2 Executive summary

As climate change continues to increase the frequency and intensity of extreme weather events and natural hazards around the world, particularly in areas, like Pakistan, that are most vulnerable to climate shocks, climate displacement has become an increasingly pressing issue³. According to the UN Refugee Agency's (UNHCR) global report on climate change, conflict and forced displacement, over the past 10 years the number of forcibly displaced people has doubled to more than 120 million people, the majority of whom (around 90 million) “are living in countries with high-to-extreme exposure to climate-related hazards.”⁴ Moreover, in the same period, around 220 million internal displacements (equivalent to around 60,000 displacements per day), have resulted from weather-related disasters; and climate-related hazards are set to increase over the coming decades, further imperilling displaced people and the countries hosting them.⁵ Addressing the nexus between climate change and displacement must therefore become an integral part of national adaptation planning, supported by clear legislative, institutional, and policy measures.

The purpose of this report is to assess which protections currently exist for people displaced by climate impacts within Pakistan's legal and policy frameworks, and to identify opportunities to strengthen these through lessons drawn from comparative and international practice.

The report focuses on two key policy instruments:

- The Pakistan National Adaptation Plan (the **NAP**); and
- The Sindh Resettlement and Rehabilitation Policy, 2022 (the **R&R Policy**).

Both represent significant progress in Pakistan's climate governance landscape. The NAP provides overarching guidance for building resilience and reducing vulnerability, while the R&R Policy offers a more detailed framework for managing displacement and resettlement at the provincial level.

However, the analysis finds that neither policy currently provides direct or comprehensive provisions for climate-displaced persons. Climate displacement is acknowledged, but not explicitly defined or operationalised, leaving critical gaps in preparedness, coordination, and protection at local, provincial, and national levels.

The Climate Refugee Bill tabled in Pakistan's National Assembly on 22nd October 2024⁶ is a promising step toward developing a dedicated legal framework to protect specifically climate displaced people. Yet, in its current draft, it primarily focuses on administrative mechanisms and does not fully address internal displacement or clearly articulate the rights and entitlements of affected individuals. As of the publication of this report, the Bill has not yet been enacted.⁷

³ IDMC Global Report on Internal Displacement (2024) at <https://www.internal-displacement.org/global-report/grid2024/> [accessed 6 October 2025]. See also Scopp, M, Human Rights Resource Center, 'Climate-Induced Displacement: Establishing Legal Protections for Climate Refugees' (2025) at <https://www.humanrightsresearch.org/post/climate-induced-displacement-establishing-legal-protections-for-climate-refugees> [Accessed 4 November 2025]

⁴ UNHCR (2024) “No Escape: On the frontlines of Climate Change, Conflict and Forced Displacement” p6 at: [Accessed 5 October 2025] <https://www.unhcr.org/media/no-escape-frontlines-climate-change-conflict-and-forced-displacement> [Accessed 5 October 2025]

⁵ *Id.* p.7

⁶ Khatri, A. (2024). 'New Bill Promises Legal Protection for Climate Refugees - Sindh Climate.' at: <https://sindhclimate.com/2024/10/29/the-rights-of-climate-refugees-would-be-protected-under-new-law/> [Accessed 31 October 2025].

⁷ L van Dijk, “Pakistan Tables Climate Refugee Bill to Address Climate-Induced Displacement” *Climate Court*, at <https://www.climate-court.com/post/pakistan-tables-climate-refugee-bill-to-address-climate-induced-displacement>. The text of the bill can be accessed at: [6717ba6e9ef98_585.pdf](https://www.climate-court.com/post/pakistan-tables-climate-refugee-bill-to-address-climate-induced-displacement)

After putting forth an analysis of the national policy instruments, the report then presents the wider international policy framework and concludes highlighting some key considerations for future policy development in Pakistan. In particular:

- The Pakistan National Adaptation Plan should directly reference climate-displaced peoples and explicitly recognize them as a ‘vulnerable community’ in line with its Leave No One Behind principle.
- The R&R Policy could be adapted to strengthen protections for internally displaced people (**IDPs**), ensuring consistent enforcement and standard criteria for compensation and resettlement.
- Policies at both national and provincial levels would benefit from integrated data systems, improved coordination mechanisms, and dedicated funding streams to support displacement-related responses.
- Emerging international tools and financing mechanisms such as the Risk Index for Climate Displacement and the Climate Catalytic Fund should be considered for integration with Pakistan’s overall climate action.
- Comparative examples from outside of Pakistan, including law and policy as well as experience and knowledge, may be instructive to overcome complex challenges of reform and implementation.

Overall, given Pakistan’s acute vulnerability to climate shocks and the growing scale of displacement, it is timely to deepen research,⁸ enhance coordination, and develop tailored policy and legal responses to protect those directly affected.

⁸ Including on Pakistan’s NDC and any disaster risk reduction (DRR) strategies / policies.

3 Introduction

3.1 What is Climate Displacement?

Although there is no universally agreed definition, the term climate displacement is commonly used to describe the movement of people who are compelled, or feel compelled, to leave their habitual place of residence as a result of the adverse impacts of climate change. It is understood to encompass all “forms of human movement, whether internal or cross-border, and whether voluntary to some extent, or forced. Movement may be temporary or permanent, and the climate change related trigger may be a slow onset or rapid onset environmental hazard”⁹; although some have distinguished between forced or unavoidable “displacement” and voluntary “migration”.¹⁰ While some climate displacement takes place across borders (creating so-called “climate refugees”), most climate displacement takes place within countries.¹¹

As a significant driver of internal displacement, climate change not only intensifies the frequency and severity of extreme weather events but also acts as a “threat multiplier.” It exacerbates existing vulnerabilities such as poverty, loss of livelihoods, and competition over dwindling resources which can heighten social tensions, increase the risk of conflict, and ultimately force people to move.¹² According to UNHCR, climate-related disasters triggered over 50% of new reported displacements in 2022, and 60% of refugees and IDPs live in countries that are among the most vulnerable to climate change.¹³ Reportedly, “[i]n 2022, for example, disasters triggered a record 32.6 million internal displacements, of which 98% were caused by weather-related hazards such as floods, storms, wildfires and droughts, according to the International Displacement Monitoring Centre (IDMC).”¹⁴ While these kinds of statistics are available, the impacts of climate change as a threat multiplier¹⁵ are harder to quantify.

IDPs, unlike refugees, do not have a specific legal status under international law, and their rights are protected under international human rights instruments and customary law, like other civilians. The 1998 UN Guiding Principles on Internal Displacement (**ID Guiding Principles**)¹⁶ “restate and compile existing international human rights and humanitarian law germane to the internally displaced” and seek to clarify “grey areas” in international law relating to IDPs.¹⁷ In particular, the ID Guiding Principles note that arbitrary displacement is prohibited, and that IDPs “have the right to assistance from competent authorities in voluntary, dignified and safe return, resettlement or local integration, including help in recovering lost property and possessions. When restitution is not possible, the Guiding Principles call for compensation or

⁹ UNESCO, (2020), ‘The impact of climate displacement on the right to education’ p2 at <https://unesdoc.unesco.org/ark:/48223/pf0000374966> [Accessed 10 April 2024]

¹⁰ International Federation of Red Cross and Red Crescent Societies (IFRC) ‘Fact Sheet: Displacement and Climate Key Terms’ at https://ctk.climatecentre.org/downloads/modules/training_downloads/2g%20FactSheet%2002%20-%20Displacement%20and%20Climate%20-%20Terminology.pdf [Accessed 10 April 2025]

¹¹ *Ibid.* and UNHCR (2025).

¹² Sigfried, K, UNHCR (2023) ‘Climate change and displacement: the myths and the facts’ at <https://www.unhcr.org/news/stories/climate-change-and-displacement-myths-and-facts> [Accessed 10 April 2025] See also footnote 1

¹³ *Ibid.*

¹⁴ *Ibid.*

¹⁵ *Ibid.*

¹⁶ United Nations E Economic and Social Council (1998). Guiding Principles on Internal Displacement at <https://documents.un.org/doc/undoc/gen/g98/104/93/pdf/g9810493.pdf> [Accessed 10 April 2025]

¹⁷ Special Rapporteur on the human rights of internally displaced persons, ‘About internally displaced persons’ at <https://www.ohchr.org/en/special-procedures/sr-internally-displaced-persons/about-internally-displaced-persons>. [Accessed 10 April 2025]

just reparation (Principles 28-30)".¹⁸ The responsibility for such assistance lies with the governments of states where the IDPs are located.¹⁹

The ID Guiding Principles, it should be noted, are not binding on any state; and often countries' legislation "fails to address the specific needs and vulnerabilities of IDPs, to clarify the roles and responsibilities of competent authorities, or to allocate necessary resources for their protection and assistance."²⁰ This appears to be the case for existing and proposed legal frameworks in Pakistan, as further discussed below. This situation has engendered calls to "explore how national and local policy frameworks that address climate change, including National Adaptation Plans and National Development Plans, can incorporate provisions for the protection of displaced people into their approach and implementation, drawing on the Global Compact on Refugees", and recognise the need to protect displaced populations in legal and policy frameworks on climate action.²¹

In its recent landmark Advisory Opinion on the obligations of states in respect of climate change, the International Court of Justice recognised that "conditions resulting from climate change which are likely to endanger the lives of individuals may lead them to seek safety in another country or prevent them from returning to their own", and that states have obligations not to force climate displaced people to go back to countries where their life is in danger.²² Whilst it provides an important statement clarifying the law on *non-refoulement* in the climate context, however, the ICJ's Opinion does not address IDPs.

3.2 How is Pakistan Affected by Climate Displacement?

Pakistan is extremely vulnerable to the impact of climate change, ranking 3rd out of 191 countries on the INFORM Risk 2025 index for greatest hazards and exposure, particularly to earthquakes, droughts, floods and conflicts.²³ Pakistan, which has a predominantly hot desert climate, has seen extreme weather events increase in frequency and become more severe. The IDMC's Global Report on Internal Displacement (**GRID**) 2024 found that 26.4 million internal displacements were caused by disasters, with 732,000 such displacements taking place in Pakistan, which is the second country (after Afghanistan) for number of people displaced due to disasters.²⁴

The 2022 floods which submerged one third of the country have been one of the gravest examples of adverse weather events exacerbated by climate change, causing widespread loss of life, destruction and damage.²⁵ Following the floods, more than 8 million people were displaced and nearly 600,000 were living in relief

¹⁸ *Ibid.*

¹⁹ *Ibid.*

²⁰ UNHCR (2024) p. 38

²¹ UNHCR (2024), p.51

²² ICJ Advisory Opinion on the obligations of states in respect of climate change, 23 July 2025, paragraph 378. See also Riemer "A Single Paragraph's Promise: The ICJ's Advisory Opinion on Climate Change and the Understated Question of Human Displacement" at <https://blogs.law.columbia.edu/climatechange/2025/07/26/a-single-paragraphs-promise-the-icjs-advisory-opinion-on-climate-change-and-the-understated-question-of-human-displacement/> [Accessed 2 September 2019]

²³ DRMKC – INFORM Country Risk Profile at <https://drmkc.jrc.ec.europa.eu/inform-index/INFORM-Risk/Country-Risk-Profile> See also DRMKC - INFORM Risk Results and Data at <https://drmkc.jrc.ec.europa.eu/inform-index/INFORM-Risk/Results-and-data> and DRMKC - INFORM Climate Change Tool at <https://drmkc.jrc.ec.europa.eu/inform-index/INFORM-Climate-Change/INFORM-Climate-Change-Tool>. [Accessed 10 April 2024]

²⁴ IDMC Global Report on Internal Displacement (2024) at <https://www.internal-displacement.org/global-report/grid2024/> [Accessed 6 October 2025]

²⁵ See Mishra, VUN News (2023) "Pakistan floods a 'litmus test' for climate justice says Guterres" at <https://news.un.org/en/story/2023/09/1141587> [Accessed 4 November 2025]. A claim being brought by a group of farmers from the Sindh region against German companies RWE and Heidelberg Materials seeking compensation for their harvests devastated by the floods further promises to establish the link between the 2022 floods and anthropogenic climate change. See: Kaminski, I, The Guardian (2025) "Pakistani farmers to sue German polluters over climate-linked flood damage" [Accessed 4 November 2025]

sites.²⁶ Communities and infrastructure were severely impacted, with over 2 million homes, 13,000 km of highways, 439 bridges, more than 4 million acres of agricultural land²⁷ and almost 26,600 schools damaged or destroyed, mainly in Sindh,²⁸ with damages and losses of over \$30.1 billion.²⁹ Around 7,000 schools across the country were used to accommodate displaced people, rendering them unusable for schooling even after the emergency passed.³⁰ Displacement has also been linked to increased vulnerability of women and girls to gender-based violence (**GBV**).³¹

In the summer of 2025, severe monsoon flooding caused at least 785 deaths (of which 465 occurred in Khyber Pakhtunkhwa (**KP**)) and over 1,000 injuries nationwide. It damaged critical infrastructure including over 661 km of roads, 234 bridges, nearly 4,700 houses, and resulted in the loss of more than 5,400 livestock, severely impacting mobility, livelihoods, and access to services.³² In KP, 23,430 people have reportedly been displaced, with 3,905 families relocated to various shelters (mainly education facilities).³³ In addition to flooding, other related events such as an increase in lightning strikes have caused fatalities and livestock losses.³⁴

Beyond natural hazards, climate change is causing the loss of agricultural and grazing land and increased water scarcity, leading to loss of livelihoods and greater pressure and competition for the remaining scarce resources – further contributing to climate displacement.³⁵ Moreover, the impacts of climate change are worsening the existing refugee crisis in Pakistan, which is hosting over 3.7m refugees from Afghanistan who are already living in legal precarity given the lack of a national refugee law framework and often occupying informal settlements prone to negative effects of natural hazards.³⁶

A report by the University of Reading's Walker Institute for interdisciplinary climate research summarises some of the dynamics at play in climate migration in Pakistan – including the fact that many migrants are attracted to Pakistan's cities, seen as more secure, but where in effect around 50% of city dwellers live in slums with inadequate water, sanitation and hygiene (**WASH**) facilities, and are particularly vulnerable to flash floods, cyclones, dust storms and extreme heatwaves,

²⁶ Nabi, Ijaz, (2023) 'Responding to Pakistan floods' The Brookings Institution, at [Accessed 10 April 2024]. <https://www.brookings.edu/articles/pakistan-floods/> [Accessed 10 April 2024]

²⁷ *Ibid.*

²⁸ Barón, Bend, Roseo, Farrakh, (2022) 'Floods in Pakistan: Human Development at Risk', the World Bank

²⁹ Nabi (2024)

³⁰ Barón et al (2022)

³¹ PDNA Main Report, p. 46

³² United Nations Office for the Coordination of Humanitarian Affairs (OCHA) (2025) 'Pakistan: Monsoon Floods 2025 Flash Update #2 (As of 22 August 2025)' at <https://www.unocha.org/publications/report/pakistan/pakistan-monsoon-floods-2025-flash-update-2-22-august-2025> [Accessed 2 September 2025]

³³ *Ibid.*

³⁴ Iftikhar Talpur (2025) 'Gowing Threat Of Lightning In Tharparkar: Unraveling The Causes' at: <https://www.thefridaytimes.com/28-Jan-2025/gowing-threat-of-lightning-tn-tharparkar-unraveling-the-causes> [Accessed 10 April 2025]

³⁵ NAP, p.19

³⁶ Othering & Belonging Institute at UK Berkeley (2022). "Pakistan Case Study | Climate Refugees | Othering & Belonging Institute". at https://belonging.berkeley.edu/climatedisplacement/case-studies/pakistan#footnote15_8c6bxuq [Accessed 10 April 2025]; N. Sayed and Z. Kunbhar. (2025) "Afghan Refugees Caught Between Climate Hazards and Deportation in Karachi, Pakistan". At: <https://blogs.law.ox.ac.uk/border-criminologies-blog/blog-post/2025/11/afghan-refugees-caught-between-climate-hazards-and-> [Accessed 7 November 2025]

contributing to chaotic urban sprawl.³⁷ The Mapping Displacement project³⁸ compiled an anthology of ‘Climate and Conflict’ Displacement Stories’ from Karachi and Islamabad exploring the “ripple effects” of displacement as a catalyst of “ethnic and racial tensions that exacerbate the plight of both displaced and host communities”.³⁹

Moreover, climate displacement is an intersectional issue, insofar as it affects most severely those parts of the population which are already marginalised and disadvantaged “by intersecting structures of inequity, including racism, ableism, ageism, gender inequality, and discrimination against the LGBTQIA+ community”.⁴⁰ Regarding the position of women in particular, it’s now recognised that “everywhere, women and girls face the greatest threats and the deepest harm.”⁴¹ The socio-economic tensions, which climate change exacerbates as a “threat multiplier”⁴², include the fact that women carry out the majority of unpaid work (including caregiving and subsistence work), are in the minority when it comes to land ownership and decisional power, and are most at risk of physical and sexual abuse – particularly in the context of displacement.⁴³

³⁷ Cornforth et al, (2023) “Pakistan Climate Change Impact Storylines Based on Existing Vulnerability Literature” at [https://centaur.reading.ac.uk/113398/1/Pakistan Climate Change Impact Storylines Based on Existing Vulnerability Literature.pdf](https://centaur.reading.ac.uk/113398/1/Pakistan%20Climate%20Change%20Impact%20Storylines%20Based%20on%20Existing%20Vulnerability%20Literature.pdf) [accessed 10 April 2025] The report also notes the different regions in the country where most displacement is taking place; as does another report published by the Sustainable Development Policy Institute (SDPI) and Climate Action Network South Asia (CANSAs): K M Salik, M Shabbir, K Naeem, (2023) “Climate-Induced Displacement and Migration in Pakistan: Insights from Muzaffargarh and Tharparkar districts” [Accessed 10 April 2025]

³⁸ Mapping Displacement. (2024). Policy Brief - Mapping Displacement at: <https://thedisplacement.com/policy-brief/> [accessed 13 April 2024] This project’s resources include information provided by the Internal Displacement Monitoring Centre (ICMD). See: IDMC - Internal Displacement Monitoring Centre. (n.d.). Pakistan. at: <https://www.internal-displacement.org/countries/pakistan/>. [Accessed 13 April 2024]

³⁹ *Ibid.*

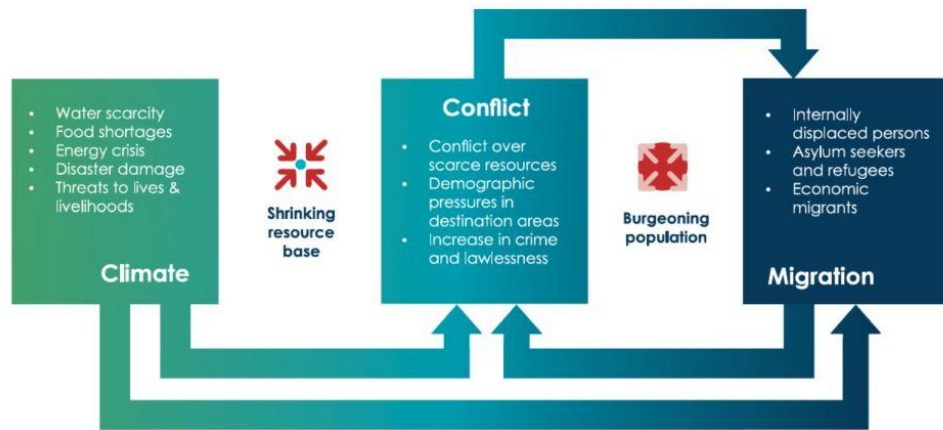
⁴⁰ Dazé, A, Christoffersen, A, (May 2025) International Institute for Sustainable Development (IISD) Working Paper “Unpacking Intersectional Approaches to Climate Change Adaptation” at <https://genderclimatetracker.org/sites/default/files/Resources/intersectional-approaches-climate-change-adaptation.pdf> [Accessed 6 October 2025]

⁴¹ Guterres, A, (2022) Press Release SG/SM/21181’ at <https://press.un.org/en/2022/sgsm21181.doc.htm> [Accessed 6 October 2025]

⁴² Lawrence, W, et al. (17 July 2024) “Empowering Women in Climate Resilience: The Role of Insurers in Bridging the Gender Gap” at <https://www.clydeco.com/en/insights/2024/07/empowering-women-in-climate-resilience-the-role-of> [Accessed 6 October 2025], citing Commission De Consolidation De La Paix, “Climate change recognized as ‘threat multiplier’, UN Security Council debates its impact on peace” at <https://www.un.org/peacebuilding/fr/news/climate-change-recognized-%E2%80%98threat-multiplier%E2%80%99-un-security-council-debates-its-impact-peace>

⁴³ See Mohamed, N H and Mohamed, N, World Economic Forum (17 July 2023) “Intersectionality can help us identify the women at climate change’s sharpest edge” at [accessed 6 October 2025]. See also Mulrean, C “Gender-Based Violence on the Rise As Climate Crisis Intensifies”, Earth.org at <https://earth.org/gender-based-violence-on-the-rise-as-climate-crisis-intensifies/> [Accessed 6 October 2025]. <https://www.weforum.org/stories/2023/07/intersectionality-climate-change-women/> [Accessed 6 October 2025]. See also Mulrean, C “Gender-Based Violence on the Rise As Climate Crisis Intensifies”, Earth.org at <https://earth.org/gender-based-violence-on-the-rise-as-climate-crisis-intensifies/> [Accessed 6 October 2025]

Figure 2.1.2: Links between Climate Change and Conflict and Migration

Source: Adapted from Abel et al., "Climate, conflict and forced migration"⁴⁵

44

3.3 Pakistan's Approach to Climate Displacement

Pakistan's approach to climate displacement appears to have been fragmented and addressed through a patchwork of different measures and different actors, including policies responding to a specific issue (e.g. the 2022 floods) or involving a specific jurisdiction (e.g. Sindh).

In its Policy Brief, the Mapping Displacement project notes that "the institutional framework for addressing the displacement landscape in Pakistan involves various government agencies, non-governmental organisations (NGOs), and international partners", including the National Disaster Management Authority (NDMA), the Ministry of Climate Change, the UNHCR and the World Wildlife Fund.⁴⁵ The Brief highlights "challenges persist in ensuring effective resettlement and rehabilitation. The allocation of funds, coordination among diverse entities, and the need for specialized legal frameworks to protect the rights of displaced individuals and communities are areas that require continuous attention".⁴⁶

The Brief also puts forward six key policy recommendations:

- 1 Defining displacement for policy reforms;
- 2 Utilising Pakistan's National Database and Registration Authority (NADRA) to assist in displacement scenarios, while ensuring ethical and legal requirements, such as privacy, data protection, and consent, are strictly adhered to;
- 3 Establishing an Independent Monitoring Cell on Displacement;
- 4 Integrating the National Commission of Human Rights (NCHR) into the response framework for climate and conflict displacement;
- 5 Thinking of "habilitation before rehabilitation", where the former "focuses on the immediate needs and vulnerabilities of displaced populations"; and
- 6 Ensuring local governments are "crucial partners to give visibility to invisible climate and conflict displacements."⁴⁷

⁴⁴ MoCC&EC. National Adaptation Plan Pakistan 2023 p19

⁴⁵ Mapping Displacement (2024)

⁴⁶ Ibid.

⁴⁷ Ibid.

Such recommendations, together with findings and suggestions from fora like the Cross-Regional Forum on Implementing Laws and Policies on Internal Displacement,⁴⁸ if adequately considered by decision-makers and reflected in policies, would likely be helpful in addressing climate displacement.

This report focuses on the current protections for populations displaced because of climate change, afforded (or not) by the National Adaptation Plan and the Government of Sindh's Resettlement & Rehabilitation Policy 2022. These appear to be, respectively, the most current policies to address climate change adaptation broadly in Pakistan; and, separately, to deal with resettlement in one of Pakistan's most vulnerable areas. Before addressing these, however, it is worth briefly discussing two notable examples of action taken to address (1) the response to one of the disasters which has triggered mass displacement, i.e. the 2022 floods; and (2) the recently tabled Climate Refugee Bill.

3.3.1 The Pakistan Floods 2022 Post-Disaster Needs Assessment

The massive displacement caused by the 2022 floods appears to have been addressed as part of larger measures to respond to the disaster. Following the 2022 floods, Pakistan's Ministry of Planning, Development, and Special Initiatives (**MoPDSI**) through its Flood Coordination Cell, supported by the Asian Development Bank, the European Union, the United Nations agencies with technical facilitation by the United Nations Development Programme, and the World Bank, prepared a Post-Disaster Needs Assessment (**PDNA**). The PDNA notes that the floods are “a wake-up call for systemic changes to address the underlying vulnerabilities to natural hazards and their intersection with other shocks”, requiring “a paradigm shift to build systemic resilience to natural hazards in development planning and asset management” through “a participatory and inclusive approach”.⁴⁹

The PDNA addresses many post-disaster requirements, from rebuilding infrastructure to restoring livelihoods, including addressing funding needs for each, and recognising the pressures and difficulties posed by the displacement of people. In terms of responses targeting displaced people, or temporarily displaced people (**TPDs**), the PDNA includes, as part of the “Immediate Response Strategy”, “outreach and mobile immunization services for the displaced; restore fixed site vaccination services (EPI and Polio centers).”⁵⁰ However, it does not make any broader or more holistic provisions for resettlement of IDPs / TPDs.⁵¹

3.3.2 The Climate Refugee Bill

The Climate Refugee Bill proposed last year aims to provide a comprehensive framework for the protection of Pakistani “Climate Refugees”, but it is still at proposal stage,⁵² and (at 12 pages in length) is not very detailed.

The Bill defines “Climate Refugees” as “individuals or communities in Pakistan who are forced to leave their home or area due to the adverse impacts of climate change”. However,

⁴⁸ See the Cross-Regional Forum on Implementing Laws and Policies on Internal Displacement Summary Note (2023)

⁴⁹ PDNA Main Report [Accessed 10 April 2025]

⁵⁰ PDNA Supplemental Report, p. 44

⁵¹ The 2022 flood response also saw the UN International Organization for Migration's (IOM) Displacement Tracking Matrix (DTM) programme launch “mobility tracking operations in flood-affected settlements or settlements that hosted temporary displaced persons (TDPs) across 11 districts in Balochistan and Sindh to provide partners with timely information on the displacement situation. Since then, DTM's mobility tracking has expanded to cover 30 districts across three provinces (Balochistan, Sindh and Khyber Pakhtunkhwa) and collects information on the multisectoral needs and recovery needs at the settlement level, in addition to the displacement situation.” However, the reports currently available on the IOM DTM's website appear to focus on the flow of Afghan refugees rather than IDPs. See: <https://dtm.iom.int/pakistan#producttabs> [Accessed 6 November 2025]

⁵² The Bill defines climate-displaced people generally as “refugees” even though, under international law, “refugees” are, by definition, people who cross borders / leave their country of nationality

the Bill notes it applies only to Pakistani citizens (Art 18), hence does not address the problem of climate refugees from other countries, or foreign nationals in Pakistan who are displaced internally. Nor does it clarify whether it addresses only displacement internal to Pakistan and/or external displacement. The Bill could usefully explicitly define the rights and legal status of IDPs and be amended so as to apply to individuals who have been displaced internally as well as across borders.

The Bill's focus is the establishment of a Climate Refugees Centre (**CRSC**) at Islamabad, with regional offices, that will, among other things, register climate refugees in a national database, "*catalogue and safeguard the land and homes left behind*" by the refugees, "*establish [temporary] tent cities for the Refugees*" as well as WASH and schooling facilities and carry out other administrative and coordination functions (Art 4). The CRSC is to be directed and administered by a Board of Governors comprised mainly of federal government ministers (from the Ministry of Finance, of Climate Change and of food security), and chaired by the minister "*of the concerned Ministry dealing with the subject of Human Rights*" (Art. 5).

The Bill makes some provisions for economic inclusion and livelihood of Climate Refugees, mandating that they "*shall have access to formal employment, vocational training and educational opportunities*", with "*special measures*" to be taken to protect women and children from exploitation and violence (Art 10). However, it is not clear what kinds of mechanisms will be employed to ensure the implementation of these mandates, or what such measures might include. The Bill could go further in establishing and / or strengthening enforcement mechanisms for such "*special measures*", for instance including specific mandatory funding streams and systemic controls against exploitation.

The Bill also requires the Government to "*maintain transparency*" and clear communication channels with Climate Refugees regarding their return to their original residences (Art 11). However, the Bill does not envision any timelines or situations where the return might be unfeasible, nor does it address the rights of individuals in circumstances where they are able or unable to return to the areas they were displaced from. The Bill also provides for penalties for individuals or authorities found to be unlawfully exploiting, extorting or harassing Climate Refugees, in the amount of at least 100,000 rupees (Art 17); but there are no specifics about enforcement.

4 National Adaptation Plan Pakistan 2023

4.1 Overview of the NAP

To address the growing impacts of climate change, Pakistan's Ministry of Climate Change and Environmental Coordination (**MoCC&EC**) developed the National Adaptation Plan (**NAP**) 2023, a seven-year framework providing national guidance on building climate resilience and reducing vulnerability to climate-related hazards.⁵³ However, the NAP does not set out specific provisions addressing climate displacement.⁵⁴ The plan was developed in the wake of the 2022 floods that affected 33 million people, underscoring the urgency of systematic adaptation.⁵⁵ It seeks to strengthen Pakistan's socioeconomic and environmental resilience, emphasising protection of vulnerable groups and the equitable use of resources. The NAP aligns with Pakistan's Nationally Determined Contributions (**NDCs**) under the Paris Agreement, serving as a key instrument to operationalise the country's adaptation commitments.⁵⁶

Its thematic focus spans sectors most affected by climate change such as agriculture, water, urban development, and renewable energy and prioritises poverty reduction, education, health, and gender-responsive social inclusion. It also emphasises modernising disaster risk management and early warning systems, and mobilising sustainable climate finance to support implementation.⁵⁷ The NAP is structured around six thematic pillars, supported by four foundations and ten guiding principles, which collectively provide a framework for climate-resilient development. The pillars focus on areas such as inclusive growth, sustainable infrastructure, environmental conservation, and good governance, while the foundations emphasise capacity building, partnerships, innovation, and strategic investment. The ten guiding principles reinforce evidence-based planning, equity, and inclusive adaptation.

The Plan's adaptation priorities cover six key areas - agriculture and water, natural capital, urban resilience, human capital, disaster risk management, and gender and social inclusion - providing the main entry points for implementation. However, none of these explicitly address climate displacement, nor do they establish specific institutional responsibilities, indicators, or mechanisms to protect displaced populations.

4.1.1 Planning, Implementation, Monitoring and Evaluation of the NAP

In a government press release, the NAP is described as a framework, the beginning of an 'adaptation journey', not the end of the road.⁵⁸ According to the press release, the NAP outlines what federal ministries need to do and how they should change their development planning, highlighting that provinces will form the heart of the execution of the plan, alongside local bodies.⁵⁹

⁵³ MoCC&EC. *National Adaptation Plan Pakistan 2023* p8

⁵⁴ Shahid, Aimen, (2003) "Examining Pakistan's First National Adaptation Plan", Centre for Strategic and Contemporary Research <<https://cscr.pk/explore/themes/energy-environment/examining-pakistans-first-national-adaptation-plan/>> [Accessed 27 February 2025]

⁵⁵ *Ibid.*

⁵⁶ MoCC&EC. *National Adaptation Plan Pakistan 2023* p8

⁵⁷ MoCC&EC *National Adaptation Plan Pakistan 2023* p8

⁵⁸ Press Information Department Ministry of Information and Broadcasting, Government of Pakistan. (2003) "Federal cabinet approves Pakistan's first National Adaptation Plan, Sherry Rehman spearheads the approval of Pakistan's first national adaptation plan" at pid.gov.pk/site/press_detail/23108 [Accessed 12 March 2025]

⁵⁹ *Ibid.*

The Foreword of the NAP indicates that a Communication Strategy would be developed to support awareness and stakeholder engagement. While a tender was issued to commission this strategy, there is no publicly available information on its completion or current status.⁶⁰

At federal level, the MoCC&EC is to lead the governance and implementation of the NAP, with some assistance provided by the Ministry of Planning, Development and Special Initiatives (**MoPD & SI**).⁶¹ At provincial and local level, the local governments will be responsible for developing and implementing climate adaptation and implementation plans. Multisectoral bodies such as the Pakistan Climate Change Council,⁶² and the Expert Group (**EG**),⁶³ will provide guidance and technical input⁶⁴.

The NAP also provides for a Monitoring, Evaluation and Reporting Framework (**M&E Framework**) to monitor progress of the NAP operating as a continuous, iterative and progressive cycle to assess effectiveness of actions, ensuring transparency, and promote accountability.⁶⁵ Stakeholder engagement is a vital feature, capturing local insights from vulnerable groups and non-government actors.⁶⁶ The M&E Framework is intended to work at three levels:

- (A) Strategy and Policy Level
- (B) Planning and Program Level
- (C) Project Level

The NAP will require significant funding for its implementation. Four key pathways to create a key financing strategy for climate adaptation are set out by the MOCC&EC as follows:

- Strengthening Pakistan's capacity to formulate bankable projects;
- Mobilising domestic financing by monetising natural capital, green and blue bonds, debt for climate swaps, equity financing and results-based climate finance;
- Enabling Policy and Regulatory Environment for Private Sector Investment and channelling adaptation finance through public – private partnerships; and
- Encouraging Line Ministries to clearly appreciate climate risk within their sectors and plan investment submissions appropriately.

⁶⁰ See: United Nations Development Programme (2024). "Procurement Notices - UNDP-PAK-00881 - UNDP-RFP-2024-220Firm to To develop a Communication strategy for the NAP project" at: https://procurement-notices.undp.org/view_negotiation.cfm?nego_id=21995 [Accessed 21 April. 2025].

⁶¹ MoCC&EC. *National Adaptation Plan Pakistan 2023* p7

⁶² The Pakistan Climate Change Council is an Expert Committee on climate change formed following a direction from the Prime Minister in 2022. It is constituted under the Pakistan Climate Change Act 2017, headed by the Prime Minister and has 26 official and 20 non-official members. Their principal function is to advise and co-ordinate on Pakistan's international commitments on climate change and environmental issues. See: PMO, 'First Meeting of Pakistan Climate Change Council', (October 2022) <[Prime Minister's Office, Islamabad, Pakistan](#) [Accessed 10 April 2025]

⁶³ Group of experts from 25 technical institutions who will meet periodically to oversee the implementation of NAP (NAP, p. 28).

⁶⁴ MoCC&EC. *National Adaptation Plan Pakistan 2023* p.7

⁶⁵ *Ibid.*

⁶⁶ *Ibid.*

4.2 The NAP and Climate Displacement

The NAP makes clear that the MoCC&EC are aware of the issue of climate displacement. The NAP refers to the 8 million people displaced following the mega-flood in 2022,⁶⁷ and states that large amounts of the country are projected to be uninhabitable, leading to further mass displacement, thus straining resources and services and creating tensions between internally displaced communities.⁶⁸ Karachi, the capital of the Sindh region, exemplifies the issue of the strain on resources from climate displacement.⁶⁹

Despite this awareness of the climate displacement issue, there is no section in the NAP on policies to specifically protect displaced persons, either physically or legally. Certain provisions of the NAP, which mainly focus on improving adaptability in the face of climate change, would likely help protect these communities if adequately implemented; but it would be useful if the protection with regards to climate displacement was addressed directly by the NAP, to ensure that it is not missed in the development of policies to increase climate resilience implemented by local governments.

4.2.1 NAP Pillars

Firstly, Pillar 5 of the NAP ‘Good Governance and Policy Alignment’ could increase protection for communities affected by climate displacement, to the extent that it aligns the governments at local and national levels with national and international commitments and implements accountable governance to ensure the effective allocation of resources, effective risk management and the integration of climate considerations into development planning.

Guidance from expert agencies such as the UNHCR, which advocates for the inclusion of displaced people in climate action,⁷⁰ could be considered in adaptation planning, as well as concepts from the 1951 Refugee Convention, protection under international human rights law and regional refugee instruments.⁷¹ The Nansen Initiative, an international, state-led, consultative process to develop a protection agenda addressing the needs of climate displaced people across international borders,⁷² may also have an influence on policy in Pakistan (particularly with regard to the large number of refugees which Pakistan hosts), as would the Platform on Disaster Displacement Strategy, which aims to build on the work of the Nansen Initiative and implement its recommendations.⁷³ Other international frameworks such as the Sendai Framework for Disaster Risk Reduction, amongst others listed in section 3.3 of the NAP, also provide relevant standards for integrating displacement considerations into adaptation policy,⁷⁴ and are explored further below.

The increased integration of international frameworks into Pakistani policy could have a positive influence on the situation of communities affected by climate displacement. However, this alone may not shift the dial, given that (a) there is a

⁶⁷ MoCC&EC. *National Adaptation Plan Pakistan 2023* p.17

⁶⁸ MoCC&EC. *National Adaptation Plan Pakistan 2023* p.18

⁶⁹ MoCC&EC. *National Adaptation Plan Pakistan 2023* p.19

⁷⁰ See UNHCR (2024)

⁷¹ See The UN Refugee Agency (UNHCR) “Law and Policy for Protection and Climate Action.” at www.unhcr.org/what-we-do/build-better-futures/climate-change-and-displacement/law-and-policy-protection [Accessed 4 March 2025]

⁷² IOM The Nansen Initiative Environmental Migration Portal at <https://environmentalmigration.iom.int/nansen-initiative>. [Accessed 11 April 2025]

⁷³ UN Department of Economic and Social Affairs. “Nansen Initiative | Department of Economic and Social Affairs.” (1 May 2021), at www.sdg.un.org/partnerships/nansen-initiative [Accessed 3 March 2025]

⁷⁴ Platform on Disaster Displacement (PDD) (2023), “Strategy 2024-2030” at https://disasterdisplacement.org/wp-content/uploads/2023/12/Platform_on_Disaster_Displacement_Strategy-2024-2030_website.pdf [Accessed 26 February 2025]

lack of a comprehensive national or international legal framework on climate displacement;⁷⁵ and (b) the integration of international principles in the application of national climate policy has already been mandated, most prominently by the Lahore High Court in the seminal case of *Leghari v Federation of Pakistan* in 2015.⁷⁶

4.2.2 NAP Foundations

The foundations of the NAP Vision have the potential to positively influence the situation faced by people affected by climate displacement. Improving capacity and knowledge management, securing financial resources, collaborating internationally to deal with issues such as water scarcity, and digitalisation of governance systems to facilitate access to information and resources, if implemented accurately, would improve circumstance for IDPs, especially given that Principle 6 emphasises the need to focus on vulnerable communities.⁷⁷ Increasing access to financial resources which focus on digitalization, aimed at improving data collection facilities, may reduce the barriers to achieving climate resilience by helping build a better picture of communities' vulnerabilities and direct efforts and funding efficiently.

4.2.3 NAP Principles

Principle 1 and Principle 6 of the NAP, which influence each area of the NAP, would assist in the protection of communities affected by climate displacement. Principle 1 is to consider climate adaptation in every aspect of decision making, including in disaster preparedness, to build resilience to climate change impacts (3.5.1). If climate change adaptation is considered in every aspect of decision making, and it is ensured that communities affected by climate displacement are encompassed in this consideration, their protection would increase.

Secondly, Principle 6 'Leave No One Behind', aims to prioritise support for the most vulnerable people, places and infrastructure impacted by climate change, while building adaptive capacity for all (3.5.1). The NAP should clearly state what is considered a "vulnerable person" and include in that definition those affected by climate displacement. It could also provide for, develop and mandate specific reporting metrics for the inclusion and recovery of climate displaced people to ensure accountability of decision-making institutions at different levels of government, including at provincial levels, to ensure IDPs are not left out of plans implemented by local governments.

4.3 NAP Adaptation Priorities

Section 4 of the NAP deals with various Adaptation Priorities. With regards to climate displacement, section 4.3 on Urban Resilience, 4.4 on Human Capital, section 4.5 on Disaster Risk Management and section 4.6 on Gender, Youth and Social Inclusion are relevant.

4.3.1 Adaptation Priorities – Urban Resilience

Section 4.3 discusses the issue of urbanisation, which is increasing due to climate-induced migration and/or displacement. This comes with challenges including inadequate services, insufficient regulation, social inequity and funding constraints.

⁷⁵ Mapping Displacement (2024). See also: M Scoop, (2025) "Climate-Induced Displacement: Establishing Legal Protections for Climate Refugees" at <https://www.humanrightsresearch.org/post/climate-induced-displacement-establishing-legal-protections-for-climate-refugees> <https://www.humanrightsresearch.org/post/climate-induced-displacement-establishing-legal-protections-for-climate-refugees> [Accessed 13 April 2025]

⁷⁶ *Leghari v. Federation of Pakistan* (2015) W.P. No. 25501/201at https://www.climatecasechart.com/document/leghari-v-federation-of-pakistan_80c5 [Accessed 21 April 2025]

⁷⁷ MoCC&EC. National Adaptation Plan Pakistan 2023 p.30

Within Objective 1 of Key Objectives for Urban Resilience, specific initiatives relevant to climate displacement protections include:

- 1.1 to generate precise data on climate risk and infrastructure; and
- 1.3 to incorporate climate vulnerability and risk considerations into urban development policy will increase the protection of those displaced by potentially increasing the safety of new settlements in urban areas.

Within Objective 2, relevant initiatives include:

- 2.1 to ensure settlements do not occur in flood, landslide and liquefaction prone areas; and
- 2.6 to upgrade informal settlements based on subnational adaptation plans.

Initiative 3.3 to strengthen regulations and institutions which regulate, manage and enforce the provision of infrastructure and services will also have a positive influence on climate displaced peoples if implemented correctly, as would initiative 4.1 to enable adaptation to tackle urban heat, water scarcity and flood risks.

Finally, Objective 5 to build municipal financial capacity to meet the need of urban residents to ensure sustainable revenue streams for green and resilient urbanisation may assist in addressing the “urban sprawl” that often goes hand in hand with climate displacement⁷⁸. Improving the circumstances faced in these urban areas would increase the protection of those affected by climate displacement who relocate to cities.

4.3.2 Adaptation Priorities – Human Capital

Section 4.4 on Human Capital includes various sub-sections which relate to climate displacement.

Section 4.4.3(a) highlights the need for sectoral climate vulnerability assessments, which would involve mapping schools, clinics and other buildings in vulnerable areas and tracking data such as loss of education and spread of diseases following extreme weather events. Lack of data is one of the barriers to climate resilience identified in the NAP. Improving this would likely result in increased climate resilience for these vulnerable communities.

Furthermore, Section 4.4.3 (c) discusses the building of workforce capacities to address climate risks. Slow onset climate events, such as an average rise in temperatures and sea levels, are causing a gradual decline in agricultural productivity, degradation of ecosystem services, an increase in water requirement and a decline in soil fertility, which is reducing farm income and labour requirements.⁷⁹ On the other hand, the fast-onset climate events such as floods, extreme rainfall and heatwaves are more frequent, which are causing sudden loss of livelihood sources, crop failure and damage to life and property.⁸⁰ In equipping the labour force in communities vulnerable to climate displacement with skills and opportunities to rehabilitate their livelihoods, they will be more climate resilient and therefore better protected.

⁷⁸ See, e.g. United Nations University, (2023) 'Climate-related Migration into Cities: What We Know and Why it Matters - Our World' at < <https://ourworld.unu.edu/en/climate-related-migration-into-cities-what-we-know-and-why-it-matters> > [Accessed 11 April 2025]

⁷⁹ Salik, K., Shabbir, M. and Naeem, K. (2020). “Climate-Induced Displacement And Migration In Pakistan: Insights from Muzaffargarh and Tharparkar districts” p.5 at: https://cansouthasia.net/wp-content/uploads/2021/02/Migration_Pakistan_17_12_2020.pdf.

⁸⁰ Ibid.

Within Objective 1 of Key Objectives for Human Capital, to Mainstream Climate Adaptation in Health and Education Policies, the following initiatives in particular would benefit climate displaced populations:

- 1.1 formulating a roadmap to address challenges relating to the impact of climate change on public health;
- 1.2 improving data collection relating to climate-sensitive diseases;
- 1.5 conducting assessments to strengthen the understanding of climate change impacts on education;
- 1.6 improving data collection on loss to education days; and
- 1.7 mainstreaming climate change adaptation into the roadmap for skills development in Pakistan.

Additionally, Objective 2, to Enhance Climate Resilience through Disaster Emergency Preparedness and Response, also includes initiatives which would influence climate displaced populations:

- o 2.2 to issue timely alerts and advisories on climate and disaster information to health personnel and communities; and
- o 2.3 strengthening the capacity of all levels of healthcare bodies to respond to health risks during climate-exacerbated disasters, 2.5 to expand climate-resilient WASH facilities to unserved and underserved areas and populations and 2.8 to construct educational facilities which could serve as multi-purpose shelters in the event of weather or climate disasters, especially in vulnerable areas.

4.3.3 **Adaptation Priorities – DRM**

Section 4.5 discusses Disaster Risk Management (**DRM**) in Pakistan. It notes that the 2022 mega flood brought to the forefront the limitations of the DRM system, particularly at subnational and local levels (4.5.1), which include poor coordination and a lack of clear roles and responsibilities between stakeholders, especially between agencies mandated to manage disasters and the different levels of government. The limitations also include a weak capacity in recovery efforts in both public and private sectors, which are overstretched by the increased workload. During the 2022 floods, many suffered due to the shortage of trained personnel, financial resources and lack of operational plans.

To address these issues, the MoCC&EC's proposals include:

- o 4.5.3 (a) Strengthening Hydromet, climate and early warning systems to enable early evacuation to save lives, to aid in adaptive planning and facilitate coordination between the government and humanitarian agencies; and
- o 4.5.3 (d) Strengthening 'ex-ante recovery preparation', which involves conducting risk assessments, developing recovery plans, securing finance mechanisms such as implementing climate disaster risk and finance insurance products, building institutional capacities and establishing coordination mechanisms to mitigate risk of post-disaster delays in relief, recovery and planning. This will speed up the response of communities and authorities to disasters, reducing the time and resources needed to recover

and rebuild, therefore improving the circumstances that climate displaced communities face.⁸¹

The following initiatives (under “Objective 1”) will likely increase the protection of communities vulnerable to extreme weather events, including possibly helping prevent climate displacement:

- 1.3 undertaking GIS mapping of irrigation infrastructure to enhance flood monitoring and management;
- 1.5 strengthening hydro-meteorological monitoring, forecasting and early warning systems; and
- 1.8 strengthening knowledge management on climate change adaptation to foster innovation and capacity building.

Furthermore, Objective 3 to invest in disaster risk reduction and to bolster the resilience of communities and critical infrastructure will also assist vulnerable groups specifically through the initiatives:

- 3.5 to develop climate and disaster risk finance products focusing on vulnerable and marginalised communities;
- 3.6 to establish a climate and disaster shock-responsive social protection system, with a focus on vulnerable and marginalised communities; and
- 3.7 to ensure community infrastructure is resilient in the face of climate change impacts, protecting vulnerable communities access to power, utilities, transport and telecommunications.

Finally, Objective 4 to ‘Build Back Better’, by using risk informed approaches to recovery and reconstruction efforts includes the following initiatives relevant to protection of climate displaced populations:

- 4.6 to scale-up community-based disaster risk management, to strengthen the adaptive capacity of communities through local level organisations; and
- 4.7 to upgrade public evacuation shelters and provide comprehensive awareness training to ensure effective use thereof.

All of the above, if implemented effectively and sustainably, would likely increase protection for climate displaced people. However, more work is needed on defining how the above-listed initiatives address climate-displaced people specifically, taking into account their particular needs and circumstances, and impacts on communities on the ground. This is particularly the case with regard to disaster recovery planning, as this would necessitate dealing with displacement, and should therefore address IDPs directly as a vulnerable category.

4.3.4 **Adaptation Priorities – Gender, Youth and Social Inclusion**

Section 4.6 of the NAP emphasizes the inequalities which affect vulnerable groups and MoCC&EC’s plan to reduce the disproportionate impact of climate change on them. The MoCC&EC states that this is to be done by:

⁸¹ Early warning mechanisms and risk mapping have been identified as some of the key measures discussed in responding to disasters, including by the Cross-Regional Forum on Implementing Laws and Policies on Internal Displacement. See Cross-Regional Forum on Implementing Laws and Policies on Internal Displacement Summary Note (2023) p. 9 at https://www.unhcr.org/us/sites/en-us/files/2023-08/IDP%20Forum%20Report_1.pdf [Accessed 6 November 2025]

- 4.6.4 (a) Supporting Capacity Development of Vulnerable Groups, including encouraging diversification of income sources, and ensure equal access to resources such as education, healthcare and social protection; and
- 4.6.4 (b), by ensuring the vulnerable group's inclusion in climate related policy and development planning.

Specifically, in Objective 3 to promote the Inclusive Participation of Vulnerable Groups in Climate Related Policy and Development in Planning, initiative 3.1 of improving the data available on vulnerable groups might help address the issue of intersectional impacts of climate change. If communities displaced due to climate change are considered part of a vulnerable group, they would have additional protection. Climate displaced people should be specifically identified as a vulnerable group, to ensure they are considered as a priority in recovery efforts.

5 The Sindh Resettlement & Rehabilitation Policy

The Sindh Government, operating from Karachi, the provincial capital, governs one of the regions in Pakistan most exposed to climate-related hazards. This heightened vulnerability makes the development of a robust resettlement policy essential for ensuring that the province remains resilient, liveable, and sustainable in the face of increasing climate challenges. The Government of Sindh's Resettlement & Rehabilitation Policy 2022, which applies specifically to the province, focuses on reducing or preventing displacement and offering assistance to displaced persons⁸². However, the policy is primarily oriented towards "*project induced physical and economic displacement and resettlement*" rather than addressing climate-induced displacement directly.

5.1 Overview of the Sindh Resettlement & Rehabilitation Policy

The Sindh Resettlement & Rehabilitation Policy (the **R&R Policy**) recognises the limited support available to people in Sindh who are affected by displacement. It seeks to minimise displacement wherever possible and to provide appropriate support, compensation, and resettlement assistance in cases where displacement cannot be avoided. The R&R Policy addresses all types of displacement, including displacement caused by 'natural and climate related disasters' (1.1.4)⁸³ and relocation due to disaster and hazard prone locations (4.1.29).

The R&R Policy was introduced in 2022 by the Government of Sindh and subsequently revised on 30 January 2023 and provides the first comprehensive rehabilitation and resettlement policy for a provincial government in Pakistan, following a failed attempt in 2001 and 2002 (2.1.20). The R&R Policy applies to all Government of Sindh-approved projects in the public and private sectors and joint ventures that involve land acquisition and resettlement. It also applies to resettlement and relocation in the event of climate related or natural disasters and forced displacement. Further, the R&R Policy may be used for projects financed by international financial institutions, for example by the World Bank.

The R&R Policy's key objectives include:

- (i) to avoid and/or minimise displacement and resettlement;
- (ii) to ensure its impacts are properly identified at planning stage;
- (iii) to take appropriate compensation and resettlement and rehabilitation measures so affected persons are provided with new opportunities;
- (iv) to ensure that the resettlement and rehabilitation Policy is implemented with engagement and meaningful consultation with the community; and
- (v) to give special consideration to the needs of women and other vulnerable groups, including transgender, elderly, poor and ethnic minorities.

The R&R Policy is divided into two sections: the R&R Policy statement and manual, which includes several checklists to aid the implementation of the R&R Policy.

⁸² Government of Sindh (2023) "Sindh Resettlement & Rehabilitation Policy, 2022 at: <https://urckarachi.org/wp-content/uploads/2025/05/Sindh-ResettlemenSindh-Reset-Reh-policy-draft.pdf> [Accessed 6 November 2025].

⁸³ References are to paragraphs in the R&R Policy

5.2 Legal Framework

The R&R Policy intends to build on the gaps identified within the Land Acquisition Act (LAA) of 1894, which provides the principles and the process of acquisition of lands for government and private projects and provides compensation to affected persons (2.1.13). The LAA has been said to provide “*inadequate protection for non-titleholders’ rights, resulting in many displaced families being left without compensation or support*”.⁸⁴ However, the R&R Policy statedly does not override the LAA, which continues to act as a key statute and applies in all situations envisioned by the statute’s wording.

The R&R Policy acts alongside the Constitution of Islamic Republic of Pakistan 1973, which provides the overarching framework of property rights in Pakistan.⁸⁵ The provision of compensation is addressed in the existing protection of the Katchi Abadis Act 1987, which provides urban squatters’ rehabilitation rights by providing cash assistance or resettlement plots in government land and rehabilitation of the authorized or unauthorized occupants of a Katchi Abadi in the same or other area/locality. Thus, the R&R Policy aims to supplement the existing legal and policy gaps with regard to displacement, based on the Government of Sindh possessing the appropriate legal and constitutional approval for its implementation.

5.3 Key Provisions of the R&R Policy

The R&R Policy’s key provisions comprise:

- (A) Project-induced and other types of displacement will be avoided where feasible.
- (B) When population displacement is unavoidable, effort shall be made to minimize or reduce it by exploring all technical/engineering options in consultation with the affected people and community.
- (C) Affected people/communities will be informed and meaningfully consulted on compensation and resettlement options.
- (D) Where land is lost, affected individuals shall be compensated at replacement cost for the assets acquired and/or affected, including structures, trees, crops, and other assets or through a negotiated approach.
- (E) Effort will be made to the extent possible to provide land-for-land of the same or better quality as an option to the affected families for land-based resettlement.
- (F) Affected businesses and commercial enterprises will be compensated for loss of income and provided additional assistance to re-start businesses in the vicinity where possible or other locations.
- (G) If relocation is required, affected persons/communities shall be given options or choices for resettlement, including self-managed resettlement, and on-site resettlement, where possible, or project-sponsored resettlement sites in close proximity with all basic amenities and services. This includes support to rebuild communities and networks.

⁸⁴ International Committee of the Red Cross, 2020, cited in Mapping Displacement (2024)

⁸⁵ Article 23 of the Constitution provides that “every citizen shall have the right to acquire, hold and dispose of property in any part of Pakistan, subject to the Constitution and any reasonable restrictions imposed by law in the public interest.” Article 24(1) of the Constitution states that “no person shall be compulsorily deprived of his/her property save in accordance with law”. Article 24(2) further provides that: “no property shall be compulsorily acquired or taken possession of save for a public purpose and save by the authority of law, which provides for compensation therefore and either fixes the amount of compensation or specifies the principles on, and the manner in which, compensation is to be determined and given”.

- (H) Resettlement planning and implementation will ensure that resettlement sites are not located in areas with recurrent hazard risks and additional relevant factors should be considered.
- (I) Traditional or customary land rights of people will be recognised, i.e. religious and marginalised groups.⁸⁶
- (J) Marginalised and disadvantaged households will be identified for a dedicated social inclusion/development program with additional support and assistance under the project.

The R&R Policy provides that resettlement should be implemented as a development programme (3.2)⁸⁷; and ensures that members of affected communities will be involved during stakeholders' consultations and in planning the R&R Policy, its implementation and ongoing monitoring. Such consultations should be organised for marginalized groups at locations that are closest to and easily accessible for them. Policy drafts should also be produced in Urdu and Sindhi and diversity should be incorporated into the final policy drafts.

5.4 Entitlement for Displacement

The R&R Policy is financed by bilateral and multilateral development partners. The R&R Policy contains an 'Entitlement Matrix'⁸⁸ to be tailored to affected persons according to the 'context and needs, and based on the nature of impacts, types of displacements, and mitigation measures' (4.2.32). This is intended to supplement the rehabilitation guidelines of the National Disaster Management Authority for those displaced by natural disasters, such as floods and/or earthquakes.

This matrix is to be implemented by the Planning and Development Department of the Government of Sindh and any decisions on resettlement or cash compensation are to be done on a case-by-case basis. This would be in addition to any statutory compensation under the law (i.e., Land Acquisition Act 1894).

This divides the potential losses into eleven categories, each with varying levels of loss, each with respective entitlements. This includes:

- Loss of agricultural land;
- Loss of homestead;
- Loss of commercial and urban/industrial land with or without titles to land;
- Loss of residential structures with and without titles to land;
- Loss of common property resources, i.e. pumps, wells, ponds etc;
- Loss of crops and trees;

⁸⁶ As listed in Chapter 3 of the R&R Policy, traditional or customary land rights of people, including rights of ethnic and religious minorities, pastoralists, and other marginalized groups, will be recognized for compensation and resettlement. However, the specifics of how this will be achieved are not listed in the R&R Policy.

⁸⁷ Under paragraph 25 of the R&R Policy, resettlement should be conceptualised and implemented as a 'development programme' with complete socio-economic surveys and census of all affected people, identification of impacts and losses from land and other assets and/or forced displacement, and full inventory of affected households/persons to avoid influx of outsiders or spectators.

⁸⁸ The 'Entitlement Matrix' is a table in the Policy which sets out the kinds of entitlements that affected persons may expect to receive according to their loss. An example of a type of loss is 'loss of CPRs such as pumps, wells, ponds, village grazing land, school/religious structures used by community', under which two entitlements are listed: 1) cash compensation and 2) salvageable materials will be allowed free of cost. Additionally project-NGOs will conduct consultation meets with the committee for new relocation and reconstruction. See pages 15-22 of the R&R Policy.

- Loss of income and livelihood;
- Assistance to vulnerable groups;
- Unforeseen adverse impacts and losses.⁸⁹

5.5 Resettlement

Resettlement, as mentioned at 1.1 of the R&R Policy, covers all types of displacement in the Sindh region, including (a) development-induced displacement caused by project interventions; (ii) displacement caused by natural/climate related disasters; and (c) displacement caused by ‘non-development project’ related anti-encroachment drives (**AEDs**) or eviction of informal settlers.

The R&R Policy provides that “for those displaced by natural disasters such as floods and/or earthquakes, [it] will be used to supplement the rehabilitation guidelines of the National Disaster Management Authority (**NDMA**) for better support and services toward sustainable resettlement, together with preparedness and capacity-building for risk reduction and enhanced resilience of the affected communities. Similarly, disability impact assessment (**DIA**) should require to be considered as well.” (5.3). It is not clear whether the resettlement plans which the Policy envisions in conjunction with planned projects would be similarly applicable to displacement caused by climate-exacerbated natural disasters; though it appears that in such cases NDMA guidelines might be looked to in the first instance instead.

5.6 Implementation of the R&R Policy

The Planning and Development Department (**P&DD**) is responsible for the application of the Policy, involving other departments as appropriate (Ch 5). The Government of Sindh is to use institutional capacity to implement the Policy, allocating necessary resources, orientation and staff training and recruitment of new staff with training in social sciences and resettlement management to address resettlement aspects in project operations (6.6). Those involved are meant to visit successful projects in Pakistan and elsewhere in Asia.

For large resettlements, the Policy provides for Resettlement Units to be set up with administrative and financial powers. NGOs may also help with the census/surveys, planning and implementation of resettlement.⁹⁰ However, the Policy itself does not specify or provide the needs for a designated central coordination authority and transparent mechanisms (for budget, resources, etc.) for resettlement and / or compensation. To address grievances, project-level grievance redress committees will be established (6.5). Projects will be reported on and monitored internally and externally by consultants and an independent monitoring agency. However, there is limited guidance on implementation of appropriate compensation and resettlement and rehabilitation measures, so that affected persons are provided with new opportunities.

The Summary Report on the R&R Policy provides an account of the R&R Policy’s implementation efforts to date,⁹¹ namely during Phase I of its implementation, which focuses on the Resettlement Learning Program (**RLP**), with technical support from the World Bank. The RLP aims to provide training to project staff, consultants, practitioners and others, including policymakers, officials, engineers and local civic

⁸⁹ For the full list of entitlement, see pages 15-23 of the R&R Policy

⁹⁰ Such NGOs could include the Rural Support Programmes Network, which engages in extensive data collection and surveys to support rural development initiative. See RSPN, ‘Who we are’, at www.rspn.org/who-we-are [accessed 11 April 2025]

⁹¹ Government Of Sindh Planning and Development Department “Sindh R&R Policy Implementation and Resettlement Learning Program PHASE -I Sindh Resettlement & Rehabilitation Policy” at: <http://pcmu.gos.pk/wp-content/uploads/2024/12/Summery-Report-of-Sindh-RR-Policy-Implementation.pdf> [Accessed 5 November 2025]

leaders, to “*harmonize and enhance the quality of resettlement activities*”.⁹² It briefly notes the planned implementation of Phase II and Phase III of the RLP, involving the development of materials and the establishment of institutional setup and planning process.⁹³ While resettlement planning for vulnerable people and in the context of climate change and environmental issues are proposed topics for future trainings, the Summary Report does not address IPDs or those affected by climate displacement specifically; or provide examples of how displaced individuals have been impacted by the R&R Policy.

5.7 Criticisms

Initial criticisms of the R&R Policy argued it did not address issues stemming from the application of the LAA, making brief references of avoiding, minimising and exploring alternative options, and only where feasible.⁹⁴ The R&R Policy also does not introduce a standard criteria or mechanism around questions such as taking land for public purposes or urgent reasons. Moreover, as each instance of displacement is to be reviewed on a case-by-case basis, this may result in unequal treatment of those affected, and logistical problems may arise in organising such a granular exercise of collecting relevant data and following up with proposed solutions.

There are also concerns surrounding the logistics, timely nature and cost of data collection, particularly for rural and hard-to-access areas. Whilst a data collection framework is outlined in paragraph 8.3⁹⁵ and steps to outline a data collection method are discussed in paragraph 8.2, this highlights a large number of actors, methods and instruments to be used. Further revision may be necessary to produce an effective and clear approach to be adopted across the region. Moreover, the R&R Policy could make provisions for a designated central coordination authority and transparent mechanisms (including addressing budget and resources) for resettlement and / or compensation, thus limiting reliance on ad hoc post-disaster funding.

5.8 Additional Areas to Consider

The R&R Policy presents potential gaps in ensuring the full and effective participation of poor and marginalised groups in consultation and decision-making processes. Although paragraph 28 of the R&R Policy refers to this concern, and the inclusion of vulnerable populations is identified as a key objective (1.2), further efforts are required to guarantee that these groups are systematically engaged throughout planning and implementation. Commentary following the Policy’s introduction suggests that it “*failed to adequately address the needs of peasants, particularly the landless and vulnerable*”, with compensation for losses following the heavy rains and floods being inadequate and, in some cases, non-existent.⁹⁶

As noted in 2.1, a key objective is to uphold the economic and social rights of those affected by land acquisition and involuntary displacement, which would include

⁹² *Id.* p.6

⁹³ *Id.*

⁹⁴ Fazal, H. (2023). ‘Policy debate: How the Sindh govt is rendering thousands homeless in the name of development – Urban Resource Centre’ at: <https://urckarachi.org/policy-debate-how-the-sindh-govt-is-rendering-thousands-homeless-in-the-name-of-development/> [Accessed 4 March 2025]

⁹⁵ Paragraph 8.3 of the R&R Policy states that to implement the Policy, actors will use ‘multiple and appropriate methods such as land acquisition/plot survey, census, socio-economic survey, stakeholders’ consultation, FGDs with various groups’. This is for data collection on land types, to produce detailed socio-economic data on affected populations and host populations (demography, land use pattern, infrastructure needs, carrying capacity) in the cases where projects are likely to have major resettlement portfolio).

⁹⁶ The Tribune, (16 October 2023) “Report highlights plight of the peasants of Sindh” [Accessed 12 April 2025]

that of climate-impacted IDPs, so further work is welcome to ensure the institutional mechanisms referred to are sufficient to provide adequate support.

The R&R Policy also notes in Chapter 12 that, “*past project experiences indicate poor performance in resettlement implementation management primarily due to lack of appropriate resettlement organizations at both the agency and field levels*”. Therefore, it appears there is scope for further research into this area, and to consider whether the collaboration of public and private industry resources may be enhanced to deliver the required for resettlement in the region.

5.9 **Relationship between the R&R Policy and the NAP**

The R&R Policy preceded the NAP, which references the Sindh region in relation to several examples of areas particularly affected by climate risks, including in relation to the floods, a reduction in economic growth and an increase in child fatalities due to malnutrition. Each example highlights the importance of strong policy to tackle the effects of climate change. However, the NAP does not reference the R&R Policy directly, despite several policy areas which overlap. As one of the aims of the NAP is to promote policy cohesion (5.1.2), citing that it is “*essential to promote the seamless integration of NAP priorities into policies, action plans and investment plans at the sectoral and subnational levels*”, the lack of direct reference to the R&R Policy could be a missed opportunity. Further research could be conducted into why the R&R Policy was not addressed in the NAP, and to promote the R&R Policy as a useful instrument to be implemented across different regions in Pakistan.

6 Review of the Wider International Climate Displacement Policy Landscape

6.1 Relevant International Agreements

To better evaluate and inform existing policies addressing displaced populations in Pakistan, it is helpful to contextualise them in the wider international climate displacement landscape, which has been receiving increasing, though still arguably insufficient, attention. The ramping up of efforts to tackle climate change, most notably through the UN Framework Convention on Climate Change (**UNFCCC**) Conference of the Parties (**COP**) process, and the 2015 Paris Agreement, saw greater attention being devoted to previously largely overlooked consequences of climate disasters – including displacement. While, as noted above, IDPs do not have a specific legal status under international law and the protection of their rights is mainly the responsibility of the states where they are located, efforts have been made at an international, regional and national levels to address the protection of IDPs, which would include the majority of those displaced due to climate.

The Executive Committee of the Warsaw International Mechanism for Loss and Damage associated with Climate Change Impacts (**WIM**) (established in 2013 at COP19) was mandated to establish a taskforce “...to develop recommendations for integrated approaches to avert, minimize and address displacement related to the adverse impacts of climate change.”⁹⁷ The Taskforce undertook a mapping exercise focused on the “existing international and regional guidance and tools on averting, minimizing, addressing and facilitating durable solutions to displacements related to the adverse impacts of climate change.”⁹⁸

The Taskforce’s 2018 report identified over 200 relevant tools and guidance documents aimed at averting climate related displacement and helping to minimise and mitigate the displacement effects caused by climate change.⁹⁹ The taskforce found that “at regional level, the implementation of many of the identified tools and guidance documents are steered by [strategies] developed following the adoption of international agreements, which recognise the challenges posed by displacement related climate change and disasters.”¹⁰⁰ Together with the UNFCCC and the Paris Agreement, the main international agreements that influenced regional policy around addressing causes of climate displacement include:

- (a) **The Sendai Framework for Disaster Risk Reduction 2015-2023 (Sendai Framework)**, which outlines seven clear targets and four priorities for action to prevent and reduce existing disaster risks. The Sendai Framework aims to reduce “disaster risk and losses in lives, livelihoods and health and in the and in the economic, physical, social, cultural and environmental assets of persons, businesses, communities and countries over the next 15 years.”¹⁰¹
- (b) **2030 Agenda for Sustainable Development**, which specifically lists IDPs as vulnerable people who must be empowered and whose needs are reflected in the agenda. In particular, Goal 11.5 aims to “significantly reduce the number of deaths and the number of people affected and substantially decrease the direct economic losses relative to global gross domestic product caused by

⁹⁷ Paris Agreement p36. [parisagreement_publication.pdf](#) [Accessed 26 February 2025]

⁹⁸ UNHCR, WIM Task Force on Displacement Activity II.4 (2018). ‘Mapping of existing international and regional guidance and tools on averting, minimizing, addressing and facilitating durable solutions to displacement related to the adverse impacts of climate change’ II.4 at [WIM TFD II.4 Output.pdf](#). [Accessed 26 February 2025]

⁹⁹ UNHCR, (July 2018) “Activity 11.4 UNHCR, Summary Report”, p.2 at [Microsoft Word - Short Summary WIM TFD Activity II.4 - UNHCR DRAFT 180709revC](#) [Accessed 26 February 2025]

¹⁰⁰ Ibid.

¹⁰¹ UNDRR, (2015) ‘Sendai Framework for Disaster Risk Reduction 2015-2030’ at [Sendai Framework for Disaster Risk Reduction 2015-2030 | UNDRR](#) [Accessed 26 February 2025]

disasters...” and goal 11.7 includes the aim to develop “holistic risk management at all levels” in line with the Sendai Framework.¹⁰²

The Taskforce concluded that while most international and regional tools and guidance address “climate change adaptation, disaster risk reduction, sustainable development, disaster preparedness, relief and recovery”, a small percentage of international and regional guidance is exclusively dedicated to the issue of averting, minimising, addressing and/or facilitating durable solutions to displacement related to climate change and natural disasters.¹⁰³ This suggests there is scope for the development of further international guidance on this issue.

6.2 Examples of Relevant Comparative Frameworks

There are several examples of implementation of the above-mentioned international policies at regional and national level. While a detailed review of all relevant regional or national frameworks is beyond the scope of this report, this section provides a high-level overview of select instruments that reflect emerging positive practices and innovative approaches from across the globe, offering valuable insights to strengthen Pakistan’s climate displacement strategies.

6.2.1 Asia-Pacific

Asia and the Pacific is the region most affected by disaster displacement worldwide, with disasters causing 225 million internal displacements from 2010 – 2021.¹⁰⁴ With Pakistan situated within the region, lessons of best practice offer further insight to adoption strategies for areas experiencing similar types of climate hazards. The Asia Regional Plan for Implementation of the Sendai Framework¹⁰⁵ aims to guide the implementation of the Sendai Framework in the context of the 2030 Agenda for Sustainable Development in the region. It offers valuable policy insight for Pakistan by highlighting region-specific priorities and collaborative approaches that can strengthen national resilience to climate-induced displacement.

The International Organisation for Migration IOM, the University of the Philippines Resilience Institute (UPRI), and the Asian Institute of technology (AIT) are collaborating on a co-creation mechanism which will develop new, innovative tools to address the complex issue of climate-induced displacement in Asia and the Pacific.¹⁰⁶ Examples of these tools include the Risk Index for Climate Displacement (RICD) and the Climate Catalytic Fund (CCF).¹⁰⁷ The RICD is a risk index and predictive model that will improve the quantification, understanding and forecasting of potential future challenges linked to climate change and migration, including climate induced displacement, to help increase the resilience of populations most likely to be affected and working towards averting or addressing loss of damage. The CCF is a financing tool which utilises blended finance to support governments, the local private sector and civil society in designing and implementing projects to address gaps highlighted by the RICD, taking both a short- and long-term view.¹⁰⁸

These tools could be integrated into Pakistan’s climate policy, NAP and displacement legislation to increase the protection of those affected by climate

¹⁰² UN, “Transforming Our World: The 2030 Agenda For Sustainable Development: A/Res/70/1”, at < [21252030 Agenda for Sustainable Development web.pdf](#) [Accessed 26 February 2025]

¹⁰³ UNHCR, (July 2018) “Activity 11.4 UNHCR, Summary Report”, at p. 2. [Microsoft Word - Short Summary WIM TFD Activity II.4 -UNHCR DRAFT 180709revC](#) [Accessed 26 February 2025]

¹⁰⁴ IOM (2023). Risk Index for Climate Displacement (RICD) | IOM Regional Office for Asia and the Pacific at: <https://roasiapacific.iom.int/risk-index-climate-displacement-ricd> [Accessed 6 October 2025]

¹⁰⁵ https://www.unisdr.org/files/50912_finalasiaregionalplanforimplementat.pdf

¹⁰⁶ Ibid.

¹⁰⁷ Ibid.

¹⁰⁸ Ibid.

displacement and increase the resilience of these communities, looking to the pilot schemes in Fiji, the Philippines and Indonesia for guidance.

6.2.2 Africa

The African continent holds a wealth of relevant formal and informal experience and knowledge on the topic of human displacement. A notable regional instrument addressing IDPs specifically is the 2009 African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa (**Kampala Convention**)¹⁰⁹, the first regional treaty on IDPs. Pre-dating most of the above-mentioned instruments, the Kampala Convention represents the first coordinated effort to address internal displacement at a regional level, and it has been suggested it “can serve as a benchmark beyond the shores of Africa”.¹¹⁰

The Kampala Convention is referenced in the East African Community Disaster Risk Reduction and Management Bill 2013, which under Article 4(1) requires “Partner States” to “...implement comprehensive disaster risk reduction, preparedness, response and recovery measures for the protection of persons and the natural environment from, during and after disasters in accordance with the Hyogo Framework for Action and the 1998 Guiding Principles on Internal Displacement and the 2009 African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa.”¹¹¹ The Bill requires that all measures taken to support affected persons “...fully respect their right to life, dignity, culture, liberty and security, and that does not discriminate against any person.”¹¹²

In terms of how IDPs have been addressed at the national level in Africa, the National Adaptation Plan of Kenya¹¹³ includes, in its vision, enhancing the resilience of vulnerable populations to climate shocks through adaptation and disaster risk strategies.¹¹⁴ While this does not specifically address the topic of climate displacement, Kenya’s NAP also promotes several mechanisms to assist vulnerable populations. Among them, the following may be relevant to the Pakistani context:

- providing appropriate technologies to the most vulnerable to aid in adapting to climate change;¹¹⁵
- reforming the public sector to protect vulnerable groups, specifically by ensuring climate adaptation is a cross-cutting issue across the government departments and is captured in performance contracting for government sectors;¹¹⁶
- mainstreaming climate change adaptation into the operational management of existing assets and the design of new assets to reduce risks due to climate change, and to cope with the demand increase on public facilities from the drive of rural populations to urban areas;¹¹⁷

¹⁰⁹ at: https://au.int/sites/default/files/treaties/36846-treaty-kampala_convention.pdf [Accessed 6 October 2025].

¹¹⁰ International Committee of the Red Cross, (December 2019) “The Kampala Convention: Key Recommendations Ten Years On” at https://www.icrc.org/sites/default/files/document/file_list/the_kampala_convention_key_recommendations_ten_years_on.pdf [Accessed 6 October 2025].

¹¹¹ Hajabakiga, P (2013) “East African Community Disaster Risk Reduction and Management Bill, 2013” Article 4(1), p.9. < [The East African Community Disaster Risk Reduction and Management Bill, 2013 | East African Legislative Assembly](#) > [Accessed 26 February 2025].

¹¹² *Id.*, p.12.

¹¹³ Ministry of Environment and Natural Resources (MoENR), Republic of Kenya (2015). “Kenya National Adaptation Plan 2015 - 2030” at https://www4.unfccc.int/sites/NAPC/Documents%20NAP/Kenya_NAP_Final.pdf.

¹¹⁴ [Kenyan NAP p. 3](#)

¹¹⁵ [Kenyan NAP p.24](#)

¹¹⁶ [Kenyan NAP p.25](#)

¹¹⁷ [Kenyan NAP p.27](#)

- integrating climate change adaptation into existing health programmes to protect vulnerable populations, focusing also on the impact of climate change on increasing the exposure of vulnerable groups;¹¹⁸
- integrating indigenous knowledge into early warning systems to strengthen these systems and enhancing participatory scenario planning for communities.¹¹⁹
- managing water sources, basins, water supply and wastewater and mainstream disaster risk reduction measures in the water sector planning and service delivery, particularly in high risk, vulnerable regions;¹²⁰
- strengthening the adaptive capacity of vulnerable groups, women, orphans and vulnerable children, the elderly and persons with a disability, as these groups are particularly vulnerable to a variable and changing climate, often have the least access to, and control of, resources and are less able to cope with climate shocks and stresses;¹²¹
- ensuring that continued population growth in urban areas in marginal lands vulnerable to hazards such as flooding, is matched with climate resilient urban development and green housing programmes;¹²² and
- reducing insecurity of ownership of homes and livelihoods to decrease internal migration by building the capacities of land planners in climate change land-use planning and adaptation, integrating climate change scenarios into spatial planning and updating land-use plans with climate scenarios¹²³.

The Kenyan context is not only noteworthy for these substantive points, but also given the various shared traits between Kenya and Pakistan, from the colonial legacy, to refugee hosting dynamics and similar economic development, governance and social cohesion challenges in the modern era.¹²⁴ These and other similarities with several states across Africa make it ripe for possible South-South knowledge and experience-sharing.

6.2.3 South America

Similar to Africa, South America provides examples of actions taken at the regional and national level that may be relevant for the Pakistani context. The Guidelines Towards a Regional Action Plan for the Implementation of the Sendai Framework 2015-2030 in the Americas, as titled, deals with the application of the Sendai Framework throughout the Americas and the Caribbean. The guideline sets out regional initiatives for the four identified priorities including: understanding disaster risk, strengthening disaster risk governance to manage disaster risk, investing in disaster risk reduction for resilience and enhancing disaster preparedness for effective response and to “Build Back Better” in recovery, rehabilitation and reconstruction.

The Cancun Adaptation Framework was agreed at the Cancun Climate Change Conference 2010, hosted by the Government of Mexico. The objective of the

¹¹⁸ [Kenyan NAPp.30](#)

¹¹⁹ [Kenyan NAP p.31](#)

¹²⁰ [Kenyan NAP p.33](#)

¹²¹ [Kenyan NAPp.35](#)

¹²² [Kenyan NAPp.36](#)

¹²³ [Kenyan NAPp.38](#)

¹²⁴ Both countries inherited common law systems, English-language administration, and bureaucratic structures shaped by British rule, and both are classified as lower-middle-income economies by the World Bank. Directly to the theme of the paper, both countries are highly vulnerable to climate-related stressors that impact a largely agrarian society.

framework is to enhance action on adaptation, including through international cooperation, reducing vulnerability and building resilience in developing countries.¹²⁵

At national level, Guatemala's NAP features a full chapter (Ch 6) on the nexus of climate and human mobility, highlighting the need for statistics and cooperation among institutions to protect displaced people within or across borders, and considering the types of displacement identified by the Nansen Initiative (covering forced displacement, voluntary migration, planned relocation).¹²⁶ It notes it aims to implement various international instruments ratified by Guatemala, including the WIM, as well as promoting policies to include displaced persons in adaptation efforts.

¹²⁵ Cancun Adaptation Framework, at [UNFCCC : Cancun Agreements : Adaptation](#) [Accessed 11 February 2025]

¹²⁶ Plan de Acción Nacional de Cambio Climático – PANCC (October 2018)

<https://unfccc.int/sites/default/files/resource/Guatemala-NAP.pdf> [Accessed 9 November 2025]

Way Forward

Both the National Adaptation Plan and the Government of Sindh's Resettlement and Rehabilitation Policy represent important progress in Pakistan's evolving response to climate change and its human impacts. Together, these tools signal growing national and provincial recognition of the challenges posed by climate-related displacement. Nevertheless, as climate shocks intensify and displacement becomes more frequent and complex, there is scope to further strengthen coordination, implementation and inclusion within existing policy and legal frameworks.

The NAP provides useful guidance on adaptation planning and the development of climate-resilient communities. Its success, however, will depend on how effectively provincial and local governments interpret and implement its priorities. Future iterations of the NAP could more explicitly acknowledge climate-displaced persons as a group requiring specific attention, in line with its principle of "*leaving no one behind*". Consideration might also be given to clarifying institutional roles and coordination mechanisms between the Ministry of Climate Change and Environmental Coordination, the National Disaster Management Authority, and provincial authorities, particularly regarding preparedness, relocation, and recovery measures. In addition, integrating a small number of monitorable indicators on displacement into the NAP's monitoring framework could support tracking of progress and ensure that the issue remains visible within national adaptation planning.

At the provincial level, Sindh's R&R Policy provides a more detailed basis for assisting displaced persons and reducing the risk of displacement. While the R&R Policy aims to cover climate-related and natural-disaster displacement, further refinement could help ensure consistent application across districts and promote clearer operational standards. Attention might also be directed to inclusive consultation processes, so that women, landless peasants, persons with disabilities, and other vulnerable groups have meaningful opportunities to inform planning and resettlement decisions. Strengthening institutional capacity and ensuring that adequate resources are available for implementation would also enhance the policy's overall effectiveness.

Emerging international initiatives, such as the Risk Index for Climate Displacement and the Climate Catalytic Fund, offer potentially useful models for assessing vulnerability and mobilising finance for community resilience, including to support IDPs. As these pilot tools mature, Pakistan could explore whether similar approaches might complement national efforts to anticipate, reduce, or manage displacement risks. Aligning domestic practice with relevant global frameworks, such as the Sendai Framework, the UN Guiding Principles on Internal Displacement, and regional adaptation platforms, could also help strengthen coherence and attract technical or financial support.

While the analysis and recommendations made in this report principally target government policy, effective responses to climate displacement will depend on sustained cooperation between federal, provincial, and local authorities, civil society organisations, affected communities, and international partners. Continued dialogue, research, and South-South knowledge and experience-sharing can help identify positive practices that serve as solutions and strategies that address implementation challenges. Cooperation and collaboration can ensure that policies evolve in line with community needs and global learning. This report is intended to contribute to that dialogue and strives to embody the very spirit of cooperation that holds such promise. Although significantly challenging, by building on existing frameworks, encouraging coordination, and promoting inclusive and evidence-based planning, Pakistan can continue to enhance protection and resilience for those most affected by climate change and displacement.



REFUGEE SOLIDARITY
NETWORK



500

Partners

5,500

People globally

70+

Offices worldwide*

www.clydeco.com

*includes associated offices

Clyde & Co LLP accepts no responsibility for loss occasioned to any person acting or refraining from acting as a result of material contained in this summary. No part of this summary may be used, reproduced, stored in a retrieval system or transmitted in any form or by any means, electronic, mechanical, photocopying, reading or otherwise without the prior permission of Clyde & Co LLP.

© Clyde & Co LLP 2025

V2.25