



SHADOW REPORT

Pakistan's Compliance with the International Convention on the Elimination of All Forms of Racial Discrimination

Submitted to the Committee on the Elimination of Racial Discrimination (CERD)

Follow-up to the 2024 Concluding Observations on Pakistan (CERD/C/PAK/CO/24-26)

Introduction

This submission examines Pakistan's compliance with the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), building on the Concluding Observations adopted by the Committee on the Elimination of Racial Discrimination based on the combined 24th to 26th periodic reports of Pakistan.¹ To this end, it evaluates Pakistan's implementation of the Committee's principal recommendations in line with the obligations stipulated as part of the ICERD and draws on evidence from primary and secondary sources to assess the situation of communities who are discriminated against on the basis of ethnic origin, descent, or religious identity, including the Sindhis, Hindus, Christians, Dalits, and Ahmadis. The submission begins by outlining the relevant provisions of the Convention, then evaluates the extent to which Pakistan has met its obligations as a ratifier of the ICERD, building on the CERD concluding observations in its 2024 report.

The International Convention on the Elimination of All Forms of Racial Discrimination

The ICERD was adopted by the United Nations General Assembly Resolution 2106 (XX) on 21 December 1965 and officially came into force on 4 January 1969.² It is amongst the earliest and most widely ratified core conventions, presently binding 182 States parties.³ The Convention establishes a comprehensive legal framework that requires States parties to it to actively prohibit and eliminate racial discrimination in all its forms and to guarantee the right of every person to equality before the law without distinction as to race, colour, or national origin, building on the fundamental principles of the Universal Declaration of Human Rights.

Pakistan signed the Convention on 19 September 1966 and ratified it on 21 September 1966.⁴ As a State party to the Convention, Pakistan is under a binding legal obligation to give effect to the Convention through the implementation of legislative, judicial, administrative, and other relevant measures that facilitate the speedy elimination of racial discrimination in all its forms and encourage practices that promote an inclusive society, where there is understanding and harmony between different races. Due to the ICERD's oversight mechanism, which authorises an international committee of independent experts, the CERD, to oversee the compliance of Member States with the Convention, Pakistan is also obliged to submit periodic reports to the CERD on the measures it has taken to fulfil its responsibilities and the progress it has achieved.⁵

¹ UN CERD, "Concluding Observations on the Combined 24th to 26th Periodic Reports of Pakistan: Committee on the Elimination of Racial Discrimination," United Nations Digital Library (United Nations, September 24, 2024), <https://digitallibrary.un.org/record/4062541?v=pdf#files>

² United Nations, "International Convention on the Elimination of All Forms of Racial Discrimination," OHCHR (United Nations, December 21, 1965), <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-convention-elimination-all-forms-racial>

³ United Nations, "2. International Convention on the Elimination of All Forms of Racial Discrimination," United Nations Treaty Collection, 2026, https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtldsg_no=IV-2&chapter=4&clang=en

⁴ Ibid.

⁵ Gay McDougall, "International Convention on the Elimination of All Forms of Racial Discrimination," UN Office of Legal Affairs, February 2021, <https://legal.un.org/avl/ha/cerd/cerd.html>

The CERD, established under Article 8 of the Convention, comprises 18 independent experts of high moral authority and verified impartiality who are responsible for monitoring State Parties' implementation of the Convention through periodic report reviews. Following an interactive dialogue with the concerned State party, the Committee issues Concluding Observations that identify areas of concern and set out specific recommendations.

Relevant Articles of the Convention

This submission evaluates Pakistan's compliance with its ICERD obligations, as set out in Articles 1, 2, 3, 4, 5, 6, and 7 of the Convention, which define the scope of prohibited discriminatory practices. For the sake of clarity and succinctness, this submission does not discuss Articles 8 to 25.

Article 1. Defining Racial Discrimination

Article 1(1) defines 'racial discrimination' as any distinction, exclusion, restriction, or preference based on race, colour, descent, or national or ethnic origin which has the purpose or effect of nullifying or impairing the equal enjoyment of human rights in any field of public life. Two features of this definition are particularly important. First, the inclusion of 'descent', as the Committee has confirmed in General Recommendation No. 29,⁶ means that discrimination based on caste and descent falls within the scope of Article 1(1).

Second, the specification of "purpose or effect" suggests that a law or practice that a State characterises as religious rather than racial is nevertheless constituted as racial discrimination where its effect falls upon groups defined by descent or ethnic origin. General Recommendation No. 32 further recognises that the provisions of Article 1 frequently 'intersect' with religion,⁷ and that States parties must address all such acts of discrimination rather than use the religious dimension as a means of evading scrutiny.

Article 2. Fundamental State Obligations

Article 2 requires States parties to condemn racial discrimination and to pursue by all appropriate means and without delay a policy of eliminating racial discrimination in all its forms. This includes obligations not to engage in acts of racial discrimination through public authorities, not to sponsor or defend such acts by any persons or organisations, and to review and amend governmental policies and legislation that have the effect of creating or perpetuating racial discrimination. Article 2(2) further requires States parties, when circumstances warrant, to take special and concrete measures to ensure the adequate development and protection of certain racial groups.

Article 3. Action Against Racial Segregation and Apartheid

Article 3 requires State parties to condemn racial segregation and apartheid, as well as undertake the relevant measures to prevent, prohibit, and eradicate all such practices in territories under their jurisdiction.

⁶ UN Committee on the Elimination of Racial Discrimination (CERD), "General Recommendation 29, Discrimination Based on Descent," University of Minnesota Human Rights Library, 2002, <https://hrlibrary.umn.edu/cerd/genrec29.html>

⁷ UN Committee on the Elimination of Racial Discrimination (CERD), "General Recommendation No. 32, The Meaning and Scope of Special Measures in the International Convention on the Elimination of All Forms [of] Racial Discrimination," Refworld, 2009, <https://www.refworld.org/legal/general/cerd/2009/en/70344>

Article 4. Prohibition of Hate Propaganda and Incitement

Article 4 obliges States parties to condemn all propaganda and organisations based on ideas of racial superiority or hatred, to declare punishable by law all dissemination of ideas based on racial superiority or hatred, to prohibit incitement to racial discrimination, and, as per Article 4(b), to declare illegal and prohibit organisations and propaganda activities that promote and incite racial discrimination.

Article 5. Equal Enjoyment of Rights

Article 5 requires States parties to guarantee the right of everyone, without distinction as to race, colour, or national or ethnic origin, to equality before the law in the enjoyment of a comprehensive range of civil, political, economic, social, and cultural rights. These include the right to security of person and protection by the State against violence or bodily harm; the right to marriage and choice of spouse; the right to freedom of thought, conscience and religion; the right to work, to just and favourable conditions of work, and to equal pay; the right to education and training; and the right of access to any place or service intended for use by the general public.

Article 6. Effective Protection and Remedies

Article 6 obliges States parties to ensure to everyone within their jurisdiction effective protection and remedies, through competent national tribunals, against any acts of racial discrimination contrary to the Convention, and to provide the right to seek from such tribunals just and adequate reparation for damage suffered.

Article 7. Education and Information to Combat Prejudice

Article 7 requires States parties to adopt immediate and effective measures, particularly in the fields of teaching, education, culture, and information, to combat prejudices which lead to racial discrimination and to promote understanding, tolerance, and friendship among nations and racial or ethnic groups.

Pakistan's Violations of the Convention Across Minority Communities

Building on the previously established rationale of the ICERD and its relevant constituent provisions, this section analyses Pakistan's violations of the Convention's provisions across different minority communities. In turn, each subsection identifies why an observed form of discrimination falls within the ICERD's scope, sets out the concerns raised by the Committee in its August 2024 Concluding Observations, and examines, with reference to individual case studies and relevant UN and civil society findings, the extent to which Pakistan has responded to those concerns. In particular, the following analysis focuses on three minority communities that have most prominently been victims of discrimination: Hindus (Sindhis), Christians, and Ahmadis.

I. Hindus (Sindhis)

Hindu Sindhis are an ethno-religious community defined simultaneously by Sindhi ethnic origin, language, and caste tradition. The province of Sindh is demographically dominated by

Pakistani Hindus, who comprise Pakistan's largest non-Muslim minority and make up 96 percent of the province's non-Muslim population.⁸ Discriminatory actions against Sindhis in Pakistan violate multiple provisions of the ICERD, specifically discrimination based on ethnic origin (Sindhi) and descent (a substantial proportion of Sindhis belong to Scheduled Caste communities) under Article 1(1) of the Convention. In the CERD's 2024 Concluding Observations, the Committee also expressed concern at the persistent pattern of forced conversion, forced marriage, and abduction of Hindu women and girls in Sindh, which stands in direct violation of Article 5(d)(iv).

Notably, another persistent concern remains widespread mob violence following blasphemy accusations and the subsequent systematic under-investigation and under-prosecution of these offences, which represents a direct violation of Articles 4(a), 5(a), and 5(b), which stipulate the punishment of acts of violence against persons of other ethnic origin and mandate both the right to security and equal treatment before judicial mechanisms. However, the evidence presented below indicates that, over the past 23 months since the last review, these ICERD violations have not been duly addressed and have instead intensified.

Forced Conversion and Marriage: Lack of Protection from Systematic Discrimination

The abduction and forced religious conversion of Hindu women, particularly adolescent girls between the ages of 14 and 18, through forced marriage is the clearest illustration of continued discrimination 'in effect' in violation of Article 1(1) of the Convention. In April 2026, UN Special Procedures experts found that approximately 75 percent of persons affected by forced conversion through marriage in 2025 were Hindu. Nearly 80 percent of these incidents occurred in Sindh, with "the scale and persistence of these grave human rights violations point to systemic discrimination against non-Muslim women and girls".⁹ This persistent conduct fundamentally violates the provisions outlined in Article 5, which guarantee the right to security of person (5(b)), to marriage and free choice of spouse (5(d)(iv)), and to freedom of thought, conscience, and religion (5(d)(vii)).

Between January 2021 and December 2024, the Centre for Social Justice recorded at least 421 abduction and forced-conversion cases, with nearly 282 of the victims Hindu girls and 72% of the cases concentrated in Sindh province.¹⁰ To corroborate these findings, UN experts have expressly found that forced conversions and marriages of girls from minority communities in Pakistan are routinely "[...] validated by the courts, often invoking religious law to justify keeping victims with their abductors".¹¹ As such, Pakistan's judicial organs continue to play an instrumental role in permitting and ratifying coercive acts towards Hindu women and girls, highlighting the State's direct participation in acts of discrimination, which directly oppose its responsibility not to sponsor, defend, or support racial discrimination under Article 2(1)(a) or deny equal treatment before tribunals under Article 5(a). In this sense, Pakistan embodies

⁸ Minority Rights Group, review of *Hindus in Pakistan*, Minority Rights Group, 2018, <https://minorityrights.org/communities/hindus-2/>

⁹ UN Special Procedures, "UN Experts Concerned by Forced Conversion through Marriage in Pakistan," OHCHR, 2026, <https://www.ohchr.org/en/press-releases/2026/04/un-experts-concerned-forced-conversion-through-marriage-pakistan>.

¹⁰ Centre for Social Justice, "Human Rights Observer 2025: A Fact Sheet on Key Issues Related to Religious Freedom and Minorities' Rights in Pakistan," 2025.

¹¹ UN Special Procedures, "Pakistan: UN Experts Alarmed by Lack of Protection for Minority Girls from Forced Religious Conversions and Forced Marriage," OHCHR, 2024, <https://www.ohchr.org/en/press-releases/2024/04/pakistan-un-experts-alarmed-lack-protection-minority-girls-forced-religious>

a State party that is aware of a systematic practice targeting its minority communities, especially Hindus, yet continues to encourage it with impunity. The April 2026 expert statement also notes that these concerns were first communicated to Pakistan in January 2023 and subsequently in April 2024, as well as reiterated through press releases in both years.¹² However, the persistence of the practice through 2025 demonstrates that Pakistan has treated successive UN recommendations as occasions for rhetoric rather than substantive reform.

False Blasphemy Accusations: Courts as Agents of Discrimination

In Sindh province, blasphemy allegations are often weaponised as tools of coercion and discrimination against Hindus, a large proportion of whom, including a small share of Scheduled Caste (SC) groups, work as sanitation workers, shopkeepers, and labourers. Due to the nature of their occupations, they are structurally vulnerable to false blasphemy accusations, which are often used with malicious intent to settle personal vendettas and business rivalries. However, most concerning is Pakistan's judicial process, which supports and encourages such false accusations against minority groups with impunity rather than protecting those wronged. The two cases discussed below demonstrate how different mechanisms of the State machinery, including the police, prosecutors, and courts, are often captured by accusers and lack the wherewithal to perform their protective functions.

1. Mr Notan Lal: (Imprisoned in 2019; Acquitted in 2024)

Mr Notan Lal, a teacher in a Hindu school in Ghotki district, Sindh, spent five years in prison, which exposed the Pakistani judicial system's susceptibility to mob violence and public pressure against those accused of blasphemy with no clear evidentiary backing. In September 2019, Lal was convicted by a Sessions Court on the basis of an uncorroborated claim of a student at his school who accused him of making blasphemous remarks about Prophet Muhammad.¹³

The accused student's testimony contained no credible evidence to support the accusation against Mr Lal, and it was later revealed that the accusation was fabricated as a result of a dispute over school discipline.¹⁴ In February 2022, Lal was convicted by a sessions court to 25 years in prison,¹⁵ demonstrating how lower courts often succumb to the pressure of mob violence and communal protests instead of evaluating such cases objectively.

¹² UN Special Procedures, "UN Experts Concerned by Forced Conversion through Marriage in Pakistan," OHCHR, 2026, <https://www.ohchr.org/en/press-releases/2026/04/un-experts-concerned-forced-conversion-through-marriage-pakistan>.

¹³ Hindu American Foundation, "HAF Condemns Blasphemy Conviction of Pakistani Hindu School Principal Notan Lal," Hindu American Foundation, 2022, <https://www.hinduamerican.org/press/notan-lal-blasphemy-conviction>

¹⁴ Ibid.

¹⁵ Hindu American Foundation, "Notan Lal: Pakistani Prisoner of Conscience" (Hindu American Foundation, 2022), <https://www.uscifr.gov/sites/default/files/HAF%20HR%20Factsheet%20Notan%20Lal.pdf>



Figure 1: Notan Lal at the school where he was falsely accused of blasphemy

In March 2024, Mr Lal was acquitted by the Sindh High Court, which recognised the injustice of his conviction and the lack of an evidentiary basis for imprisonment.¹⁶ This eventual overturning underscores the dangerous combination of evidentiary weakness and judicial susceptibility to communal pressure, which, more often than not, sustains wrongful convictions until they are overturned at higher levels.

Mr Lal's case is a real-life example illustrating Pakistan's violation of key tenets of the ICERD Convention. The breach lies not merely in the wrongful conviction, but in the tribunal's conviction of an individual from a minority community on unsubstantiated evidence that it would not accept against a member of the majority, thereby effectively preventing equal treatment before the law and directly infringing Article 5(a). The effects of this wrongful conviction were not limited to Mr Lal. His arrest in 2019 also sparked widespread attacks on the Hindu community of Ghotki through violence against Hindu temples, businesses, and schools, confining families indoors and prompting permanent relocations.¹⁷ These developments demonstrate how individual accusations of blasphemy have produced wider consequences for the Hindu community in Pakistan, with the lack of prevention or prosecution from the State a transgression on Articles 2 and 6 of the Convention.

2. Dr Shahnawaz Kunbar (2024)

On 26 September 2024, Dr Kunbar, a Sindhi Hindu doctor, was killed in police custody after a blasphemy accusation was filed against him on the basis of posting content on his Facebook account that was allegedly demeaning and disrespectful towards the Prophet.¹⁸ The police initially presented his death as the result of an armed encounter. However, the Pakistani government's subsequent revelation that the proposed narrative of Dr Kunbar's death in an encounter was fabricated represents an unprecedented admission of police complicity in

¹⁶ Jamal Khurshid, "SHC Sets aside Conviction of School Owner in Blasphemy Case," The News International, March 2024, <https://www.thenews.com.pk/print/1163401-shc-sets-aside-conviction-of-school-owner-in-blasphemy-case>

¹⁷ S Khan, "Hindus Fear for Their Lives after Pakistan Blasphemy Riots," Deutsche Welle, September 16, 2019, <https://www.dw.com/en/hindus-fear-for-their-lives-after-pakistan-blasphemy-riots/a-5044833>

¹⁸ Ayaz Gul, "Pakistani Police Kill Second Blasphemy Suspect within a Week," Voice of America (VOA News), September 19, 2024, <https://www.voanews.com/a/pakistani-police-kill-second-blasphemy-suspect-within-a-week/7790768.html>

blasphemy-induced murders. The false story of an encounter was formulated to conceal the real circumstances of his death by means of execution by police officers, who acted under communal pressure to eliminate an accused before he could prove his innocence in court.¹⁹ Notably, the case of Dr Kunbar represents one of the first cases of an extrajudicial killing based on a blasphemy allegation, in direct breach of Article 2(1)(a) of the Convention. Moreover, the continued absence, to date, of any publicly reported conviction of the officers responsible for this unjust killing compounds the State's breach of the Convention under Article 6.

State-Sponsored Discrimination: The Weaponisation of Education

The mob violence and extrajudicial killing documented through the above cases do not arise spontaneously. Their ideological preconditions are cultivated through educational materials produced and distributed by the State itself to students from a young age. State-issued textbooks have been found to depict Hindus as enemies of Pakistan and of Islam, employing terminology such as "Hindus' mentality" and characterising the community as "backward and superstitious".²⁰ A recent review of school textbooks found hate material in approximately 14 percent of chapters in textbooks in Punjab.²¹

The dispersion of such hateful content and sentiment through Pakistan's education system transgresses the Convention in two ways. Article 4(c) prohibits public authorities and public institutions from promoting or inciting racial discrimination. A State that does not prohibit but rather encourages the publication of material degrading an ethnic community violates this prohibition directly. Article 7 imposes a positive duty to use education to combat the prejudices that produce racial discrimination. Hence, Pakistan is in simultaneous breach of the negative and positive limbs of the Convention's educational provisions. The instrument that Article 7 requires it to deploy against prejudice is the very instrument through which prejudice continues to be propagated. Consequently, the CERD's recommendations on curriculum reform have remained unimplemented across three review cycles, and the proposal to allow non-Muslim students an alternative to Islamic studies remains pending as of the most recent reporting.

II. Christians

Christians constitute approximately 1.37 percent of Pakistan's total population, comprising about 3.3 million people, and reside primarily in Punjab (2.46 million) and Sindh province (547,000).²² Pakistan's Christian population descends principally from Scheduled Caste (SC) communities in Punjab. This social status is confirmed by the systematic channelling of Christians into sanitation and related work, as documented by Pakistan's National Commission for Human Rights (NCHR)²³ and by the International Dalit Solidarity Network's

¹⁹ Associated Press, "Pakistan Says Police Responsible for Killing a Doctor Accused of Blasphemy," CNN, September 27, 2024, <https://edition.cnn.com/2024/09/26/asia/pakistan-blasphemy-killing-police-hnk-intl>

²⁰ A Nayyar and Ahmad Salim, "The Subtle Subversion: The State of Curricula and Textbooks" (Sustainable Development Policy Institute, 2005), <https://sdpi.org/sdpiweb/publications/files/State%20of%20Curr&TextBooks.pdf>

²¹ Centre for Social Justice (CSJ), "What Are We Teaching At School?: A Content Review of School Textbooks Published by Federal and Provincial Textbook Boards in Pakistan" (Centre for Social Justice, 2025), <https://csjpak.org/publications/What-Are-We-Teaching-At-School.pdf>

²² Minority Rights Group, "Christians in Pakistan," Minority Rights Group, December 2025, <https://minorityrights.org/communities/christians-5/>

²³ National Commission for Human Rights (NCHR), "Report on Pakistan's Compliance with CERD," National Commission for Human Rights, 2024, <https://nchr.gov.pk/wp-content/uploads/2024/07/Report-on-Pakistans-Compliance-with-CERD-NCHR-Pakistan.pdf>

(IDSN) submission to the CERD,²⁴ both of which note that Christians are widely categorised as “lower caste” in Pakistan and thus are considered untouchable.

Caste-Based Segregation and Discrimination

In its August 2024 Concluding Observations, the CERD raised specific concerns regarding the Christian community. It highlighted the persistence of an unofficial caste system that disproportionately funnelled non-Muslim minorities, particularly Christians, into sanitation and other “untouchable” occupations, which directly violates Article 5(e)(i) rights to free choice of employment and to just and favourable conditions of work. Due to their descent from SC communities, Christians are forced to live in segregated colonies, are served food on separate crockery, and are prohibited from sitting indoors with dominant castes, irrespective of whether or not a Christian individual claims a Dalit identity, since caste ascription is inherited and independent of religious affiliation.

Moreover, the five percent minimum public employment quota reserved for religious minorities, while theoretically protective, is systematically under-met by provincial governments, which often fail to meet the five percent quota for hiring minority employees comprising the civil service.²⁵ In rural Sindh and southern Punjab, the same caste-based hierarchy underwrites bonded labour in brick kilns and agriculture, in which Scheduled Caste members in Sindh are engaged as daily-wage or agricultural labourers by social status rather than by choice, with no realistic exit opportunities.²⁶ Women in bondage also face widespread sexual violence and harassment, in violation of their right to security of person and protection by the State against violence or bodily harm under Article 5(b).²⁷ Although Pakistan assured the enforcement of the Bonded Labour Act across all provinces in response to the Committee’s 2024 concluding observations, the absence of publicly available caste-disaggregated data on the prevalence of bonded labour leaves its assurances of progress unverifiable.

The Committee also underscored the widespread mob violence following false blasphemy accusations, including the August 2023 Jaranwala attacks in which mobs burnt at least 22 churches and destroyed hundreds of Christian homes²⁸, the forced conversion and marriage of Christian women, and the systematic under-investigation and under-prosecution of anti-Christian violence. The Committee reiterated for the third successive review cycle its recommendation that Pakistan adopt legislation prohibiting caste-based discrimination.²⁹ Yet Pakistan has not meaningfully acted on this recommendation, with each of these concerns persisting or intensifying. Therefore, the lack of substantive change is not a gap in

²⁴ International Dalit Solidarity Network (IDSN), “Submission by the International Dalit Solidarity Network (IDSN) to the Committee on the Elimination of Racial Discrimination (CERD): 113th Session (05-23 August 2024),” 2024, https://idsn.org/wp-content/uploads/2024/08/Pakistan-CERD-Submission_IDSN_2024.pdf

²⁵ U.S. Department of State, “2022 Report on International Religious Freedom: Pakistan,” U.S. Department of State, 2022, <https://www.state.gov/reports/2022-report-on-international-religious-freedom/pakistan>

²⁶ Abdullah Khoso, “<https://hariwelfare.org/wp-content/uploads/2024/09/The-State-of-Peasants-Rights-in-Sindh-in-2023.Pdf>,” Hari Welfare Association (HWA), 2024, <https://hariwelfare.org/wp-content/uploads/2024/09/The-State-of-Peasants-Rights-in-Sindh-in-2023.pdf>

²⁷ Ibid.

²⁸ Tariq Saeed, “Damage to Jaranwala Churches, Homes Estimated at Rs67m,” Dawn, August 22, 2023, <https://www.dawn.com/news/1771458>

²⁹ UN CERD, “Concluding Observations on the Combined 24th to 26th Periodic Reports of Pakistan: Committee on the Elimination of Racial Discrimination,” United Nations Digital Library (United Nations, September 24, 2024), <https://digitallibrary.un.org/record/4062541?v=pdf#files>

implementation or enforcement, but rather a sustained refusal to undertake the Article 2(1)(c) obligation to review and amend a legal framework that permits caste-based discrimination to persist, driven by the State party's outspoken denial that a caste system exists at all.

Blasphemy Laws as Instruments of Economic Exploitation

For the Christian community, the blasphemy laws function not only as instruments of religious regulation but also as instruments of economic coercion and exploitation. The analytical significance of the cases discussed below to the ICERD lies in what they illustrate about the asymmetry of the State's response to false allegations intended to economically seize land and business from the Christian community, a practice termed as a 'blasphemy business'.

1. Joseph Colony Attack, Lahore (2013)

Following a blasphemy accusation against Savan Masih, a Christian sanitation worker, arising from a personal quarrel with his Muslim friend, Shahid Imran, a mob of nearly 3,000 people destroyed 178 homes, 18 shops, and two churches in the Christian neighbourhood of Joseph Colony.³⁰ Importantly, Christian community leaders, including the President of the Pakistan Minority Front in Lahore, alleged that the attacks were pre-meditated rather than incited, noting that "a group from the land mafia in the city's Misri Shah market had started threatening the colony's residents to vacate the area" well before the violence had ensued.³¹ The proximity of Joseph Colony to Misri Shah market rendered it a favourable target to expand the market further by driving out its Christian community based on false blasphemy allegations.³²

However, this act was possible only due to the lack of a judicial response and the consequent fearlessness of the perpetrators, which represents a core violation of the ICERD Convention. Mr Masih was convicted and spent seven years on death row before being acquitted in 2020. The 115 individuals prosecuted for the destruction of an entire neighbourhood were all acquitted in 2017, despite video evidence, on the grounds that the perpetrators could not be identified.³³ A justice system capable of producing a capital conviction against a minority individual accused on the word of a single disputant without substantive evidence, while proving institutionally incapable of convicting a single member of a 3,000-strong mob captured on film, clearly illustrates the allocation of protection and punishment along communal lines, in direct breach of Articles 5(a) and 6 of the Convention.

2. Jaranwala (2023) and Sargodha Attacks (2024)

A similar mechanism recurred at scale in Jaranwala, Faisalabad, in August 2023, when mobs burnt at least 22 churches and destroyed close to 91 Christian homes following Ehsan Masih's alleged TikTok post, which resulted in hundreds of families fleeing their neighbourhoods.³⁴ In May 2024, a mob of over 1,000 people burned the home and workshop of 74-year-old shoemaker Nazeer Masih Gill based on a social media rumour accusing him of blasphemy,

³⁰ Talia Ralph, "Christian Neighborhood in Lahore, Pakistan Attacked over Alleged Blasphemy," The World, July 31, 2016, <https://theworld.org/stories/2016/07/30/christian-neighborhood-lahore-pakistan-attacked-over-alleged-blasphemy>

³¹ Saher Baloch, "Lahore Arson: Christian Leaders Say Residents Had Been Receiving Threats," Dawn, March 12, 2013, <https://www.dawn.com/news/792092/lahore-arson-christian-leaders-say-residents-had-been-receiving-threats>

³² Ibid.

³³ Christian Solidarity Worldwide (CSW), "Court Acquits 115 Accused in Joseph Colony Attack," Christian Solidarity Worldwide, 2017, <https://www.csw.org.uk/2017/02/01/news/3445/article.htm>

³⁴ Tariq Saeed, "Damage to Jaranwala Churches, Homes Estimated at Rs67m," Dawn, August 22, 2023, <https://www.dawn.com/news/1771458>

leaving him critically injured³⁵; police subsequently filed blasphemy charges based on social media rumours alone, with no clear evidence as proof.³⁶ Further incidents in both 2024 and 2025 saw women participating in lynch mobs chanting, “The blasphemer must be beheaded”,³⁷ illustrating how accusations online can quickly spread misleading narratives that incite lethal mob violence.

The Gill case captures the structural flaws within Pakistan’s key state organs, such as the judiciary, that have driven its noncompliance with the ICERD’s provisions, including Article 6, which requires the State party to provide protection and remedy rather than treating the victim as the offender. The recurrence of identical incidents over ten years, beginning with Joseph Colony attacks in 2013 and the more recent Sargodha attacks in 2024, without a single deterrent prosecution, indicates that the failure is systemic and not episodic, which remains a severe violation of Article 2.

Forced Conversion and Marriage of Christian Women

The pattern of forced abduction, conversion, and marriage documented in the case of Hindu Sindhi women extends to the Christian community, predominantly in Punjab. The Centre for Social Justice recorded 31 Christian victims among the 83 cases documented in 2024, with approximately 28 percent of all cases occurring in Punjab and the remaining 72% in Sindh.³⁸ The April 2026 UN experts’ statement, cited previously, found that in 2025 nearly 25 percent of persons affected by forced conversion through marriage were Christian, and characterised the practice as evidencing “systemic discrimination against non-Muslim women and girls”.³⁹

The violation of the Convention, as established in the case of Hindu women and girls previously, applies with equal force to Christian women and girls. The State’s failure to investigate, prosecute, or provide remedies suggests a clear transgression of Articles 2(1)(a), 2(1)(d), 5(b), and 5(d)(iv). The State’s judicial validation of these forced conversions and marriages, as documented by UN experts, further escalates the severity of the violation to direct state participation in acts of discrimination against the Christian community.

The Absence of Safeguards for Defendants with Mental Disabilities

The blasphemy framework contains no requirement of psychiatric evaluation. As a result, blasphemy accusations against Christian defendants with mental disabilities have produced adverse repercussions, as the following case examples demonstrate. **Stephen Masih**, detained since 2019, was certified by the Punjab Institute of Mental Health as suffering from Affective Bipolar Disorder and consequently deemed unfit to stand trial,⁴⁰ with UN Special

³⁵ Christian Solidarity Worldwide (CSW), “73-year-old Christian Man Dies in Hospital after Mob Attack,” Christian Solidarity Worldwide, 2024, <https://www.csw.org.uk/2024/06/03/press/6241/article.htm>

³⁶ Clooney Foundation for Justice (CFJ), “Blasphemy Trials in Pakistan: Legal Process as Punishment” (Clooney Foundation for Justice, 2024), https://cfj.org/wp-content/uploads/2024/09/Pakistan-Blasphemy-Report_September-2024.pdf

³⁷ Human Rights Commission of Pakistan (HRCP), “Under Siege Human Rights Commission of Pakistan” (Human Rights Commission of Pakistan, 2025), <https://hrcp-web.org/hrcpweb/wp-content/uploads/2020/09/2025-Under-siege-EN.pdf>

³⁸ Centre for Social Justice, “Human Rights Observer 2025: A Fact Sheet on Key Issues Related to Religious Freedom and Minorities’ Rights in Pakistan,” 2025.

³⁹ UN Special Procedures, “UN Experts Concerned by Forced Conversion through Marriage in Pakistan,” OHCHR, 2026, <https://www.ohchr.org/en/press-releases/2026/04/un-experts-concerned-forced-conversion-through-marriage-pakistan>

⁴⁰ Jubilee Campaign, “Stephen Masih,” Jubilee Campaign USA, August 2, 2021, <https://jubileecampaign.org/stephan-masih/>

Rapporteurs publicly calling for his release in 2021.⁴¹ Similarly, **Anwar Kenneth**, whose psychiatric condition was documented before his 2001 arrest and confirmed repeatedly thereafter,⁴² spent 23 years on death row before the Supreme Court acquitted him in June 2025 based on medical evidence that had existed since 2002.⁴³ **Farhan Masih**, arrested in January 2025, was denied a mental-health assessment by a trial court and a transfer from judicial custody before his acquittal by the Anti-Terrorism Court in Sahiwal in June 2025, with the court finding that the prosecution had “failed to prove its case against him”.⁴⁴

The analytical takeaway is that each acquittal in the three cases above, although welcome, was achieved only through the persistence of defenders over several years, not by any internal safeguard within the State’s legal system. A legal framework that detains manifestly unfit defendants drawn from a marginalised, descent-linked community for decades and corrects itself only under sustained external pressure does not provide the “effective protection and remedies” that Article 6 of the Convention requires of its State Parties.

⁴¹ UN Special Procedures, “Pakistan: Christian on Blasphemy Charges Must Be Freed – Experts,” OHCHR, 2021, <https://www.ohchr.org/en/press-releases/2021/10/pakistan-christian-blasphemy-charges-must-be-freed-experts>

⁴² The World Organisation Against Torture (OMCT), “Pakistan: Mr. Anwar Kenneth Has Been Sentenced to Death under the Blasphemy Law,” The World Organisation Against Torture, 2025, <https://www.omct.org/en/resources/urgent-interventions/pakistan-mr-anwar-kenneth-has-been-sentenced-to-death-under-the-blasphemy-law>

⁴³ Barnabas Aid, “Pakistani Christian Man Freed after 23 Years on Death Row for ‘Blasphemy’,” Barnabas Aid, July 2, 2025, <https://www.barnabasaid.org/gb/news/pakistani-christian-man-freed-after-23-years-on-death-row-for-blasphemy/>

⁴⁴ Christian Daily International, “Christian Falsely Charged with Blasphemy in Pakistan Is Acquitted,” Christian Daily International, June 13, 2025, <https://www.christiandaily.com/news/christian-falsely-charged-with-blasphemy-in-pakistan-is-acquitted>

III. Ahmadis

The Ahmadi community in Pakistan comprises just 0.2 percent of the population, yet accounted for nearly 14 percent of blasphemy accusations in 2024 and approximately 30 percent of all accusations recorded since 1987.⁴⁵ A key distinction in the treatment of Ahmadis in Pakistan compared to other minority communities, including Hindus (Sindhis) and Christians, is that discrimination against them is not merely tolerated or exacerbated by the State but legally enforced by it. In its August 2024 Concluding Observations, the CERD expressed concern at the continued segregation of Ahmadis, at the discriminatory electoral law requiring their separate registration and a declaration that they are non-Muslim, and at the persistent pattern of arrests, harassment, and attacks on Ahmadi places of worship.⁴⁶

In response, the Pakistani delegation stated that “any person who was Ahmadi was not allowed to undertake religious practices which offended the Muslim community”,⁴⁷ a framing that conceded the discriminatory character of the State’s legal framework rather than defended against it. The evidence discussed in the following subsections establishes that Pakistan’s legal framework with respect to the Ahmadi community has not been reformed and that its administrative enforcement has instead escalated in 2025 and 2026.

The Legal Persecution of Ahmadis

The Second Constitutional Amendment of 1974 declared Ahmadis non-Muslims. In parallel, Ordinance XX of 1984 inserted Sections 298-B and 298-C into the Penal Code, criminalising the community’s right to self-identify as Muslim, its right to designate mosques as its place of worship, and its performance of Islamic rituals. According to the Pakistan Penal Code, a violation of these constitutional guidelines brings with it a punishment of up to three years of imprisonment and, in certain cases, the death penalty.⁴⁸ Article 3 of the Convention mandates States parties to “prevent, prohibit and eradicate” racial segregation. Article 2(1)(c) obliges them to amend laws that perpetuate discrimination. Article 5(c) guarantees civil and political rights on equal terms. Pakistan continues to violate all three provisions of the Convention, rooted in national legislation that has stood for four and five decades respectively, and has survived three successive cycles of Committee recommendations without amendment.

The Administrative Enforcement of Discrimination: The 2025-2026 Escalation

The most recent evidence demonstrates that the aforementioned discriminatory statutes remain actively enforced. In an open letter dated 21 May 2026 to the Chief Minister of Punjab, a province that houses approximately 86 percent of Ahmadis in Pakistan, Amnesty International documented the events that occurred during Eid al-Fitr in March 2026. In particular, Ahmadi congregations were prohibited outright in Gujranwala, police intervention

⁴⁵ Centre for Social Justice, “Human Rights Observer 2025: A Fact Sheet on Key Issues Related to Religious Freedom and Minorities’ Rights in Pakistan,” 2025.

⁴⁶ UN CERD, “Concluding Observations on the Combined 24th to 26th Periodic Reports of Pakistan: Committee on the Elimination of Racial Discrimination,” United Nations Digital Library (United Nations, September 24, 2024), <https://digitallibrary.un.org/record/4062541?v=pdf#files>

⁴⁷ United Nations, “Experts of the Committee on the Elimination of Racial Discrimination Commend Pakistan on ‘A’ Status for National Human Rights Commission, Raise Questions on Blasphemy Laws and the Illegal Foreigners Repatriation Plan,” OHCHR, 2024, <https://www.ohchr.org/en/meeting-summaries/2024/08/experts-committee-elimination-racial-discrimination-commend-pakistan>

⁴⁸ The Pakistan Code, “The Pakistan Penal Code” (The Pakistan Code, 1860), <https://pakistancode.gov.pk/pdf/files/administratord5622ea3f15bfa00b17d2cf7770a8434.pdf>

halted worship across six locations in Sialkot, worshippers were forcibly removed from a prayer site in Faisalabad, and multiple Ahmadi places of worship were sealed in Sargodha on 21 March 2026.⁴⁹ The same letter notes that in 2025 Ahmadis were forced to sign affidavits pledging not to perform Eid rituals, and that since 2024 local authorities have refused to issue or register Ahmadi marriage and divorce documentation, leaving the community entirely “at the mercy of arbitrary decisions by local administration”.⁵⁰

The significance of this evidence with respect to the Convention is that every actor identified in it is a public authority. The State’s own organs have been responsible for discrimination against the Ahmadis, including police who halt worship, district administrations that seal mosques and forcibly mandate affidavits, and registrars who refuse to recognise or issue marriage and divorce certificates. The state-sponsored nature of these discriminatory acts fundamentally contradicts its responsibilities under Article 2(1)(a) and goes against the rights guaranteed by Article 5(d)(iv) (marriage) and 5(d)(vii) (religion), indicating little to no change in the State’s administrative practices since the Committee’s 2024 review.

Destruction of Religious Infrastructure

The destruction of Ahmadi religious architecture has accelerated rapidly over time. Since 2014, at least 134 places of worship have been attacked or demolished, 44 desecrated in 2023 alone, and 109 graves and gravestones destroyed in the same year.⁵¹ In July 2025, UN Special Procedures experts, citing the demolition of a century-old mosque in Daska, the closure of a mosque in Malir, Karachi, and the destruction of minarets in Bahawalnagar, noted that “[...] these attacks take place with tacit official complicity whilst the cycle of fear prevents people and institutions from upholding the rights and dignity of these minorities”.⁵² The UN Special Rapporteur on Freedom of Religion or Belief further noted in her 2026 report that hundreds of Ahmadi graves have been desecrated in Punjab and that Ahmadi funeral rites are “often reportedly encroached upon” by authorities.⁵³

In cases where the demolition is carried out or supervised by the police, the violation goes directly against Article 2(1)(a); where it is carried out by mobs whose identity is known and who are never prosecuted, the violation is under Article 6 failure, representing a failure of protection and remedy against blatant acts of discrimination. A notable case that encapsulates both violations is the Kotli attack of 17 June 2024, which saw a mob of approximately 150 attack an Ahmadi mosque on Eid.⁵⁴ Despite an early warning from the Ministry of Interior itself, the police were absent from the site of attack, worshippers were injured, and the assailants

⁴⁹ Amnesty International, “Pakistan: Open Letter to Chief Minister of Punjab Maryam Nawaz to Protect Rights of Ahmadis,” Amnesty International, May 20, 2026, <https://www.amnesty.org/en/documents/asa33/1026/2026/en/>

⁵⁰ Ibid.

⁵¹ Ahmadiyya Muslim Foreign Missions Office, “Persecution of Ahmadis in Pakistan: Annual Report 2023,” Ahmadiyya Muslim Foreign Missions Office, 2023, <https://verfolgung.ahmadiyya.de/files/Persecution-of-Ahmadis---2023.pdf>

⁵² UN Special Procedures, “Pakistan: Widespread Impunity for Violence and Discrimination against Minorities Must End, Warn UN Experts,” OHCHR, 2025, <https://www.ohchr.org/en/press-releases/2025/07/pakistan-widespread-impunity-violence-and-discrimination-against-minorities>

⁵³ UN Special Rapporteur on freedom of religion or belief, “A/HRC/61/50: How Freedom of Religion or Belief Relates to Death and Honouring the Deceased,” OHCHR, 2026, <https://www.ohchr.org/en/documents/thematic-reports/ahrc6150-how-freedom-religion-or-belief-relates-death-and-honouring>

⁵⁴ Persecution of Ahmadis, “Ahmadiyya Mosque Attacked in Kotli, AJK on Eid Day,” Persecution of Ahmadis, April 30, 2026, <https://persecutionofahmadis.org/persecution/desecration-of-mosques-in-the-name-of-religion/2024/06/17/ahmadiyya-mosque-attacked-in-kotli-ajk-on-eid-day/>

fled without consequence,⁵⁵ while, on the same day, more than 30 Ahmadis across Pakistan were arrested for celebrating Eid.⁵⁶ A State whose police fail to protect a forewarned congregation, but can be produced in numbers to arrest its members for celebrating their religion, has inverted the protective function that Articles 2, 5(b), and 6 necessitate.

Targeted Killings of Ahmadis and State Impunity

The killings of Ahmadis follow a similar pattern to the desecration of their religious infrastructure. The Special Rapporteur's 2026 report finds that at least three Ahmadis were killed in targeted attacks in 2025, with five surviving assassination attempts. A paradigmatic case remains that of Tahir Ahmad Naseem, who was shot dead in July 2020 inside a Peshawar courtroom, during the proceedings of his own blasphemy trial, by an assailant who had entered the court armed and who was later celebrated publicly as a hero.⁵⁷

The courtroom killing, followed by the public celebration of the killer without effective state counteraction, is analytically powerful, as it highlights how the State's impunity for anti-Ahmadi violence is not a gap in enforcement but rather a social expectation that the State has allowed to consolidate. The permissibility of such actions violates Pakistan's protective obligation under Article 5(b), which is expected to be at its peak inside the premises of its own tribunals. The July 2025 UN expert statement confirms that the sentences imposed in the few prosecuted cases have often "failed to meet the gravity of offences", allowing perpetrators to "avoid justice with impunity".⁵⁸

Case Study: Mubarak Sani (2024)

Mr Sani, a 45-year-old Ahmadi school teacher based in Sargodha, was arrested in February 2024 for distributing the text *Tafseer-e-Sagheer*, a translation and commentary on the Qur'an. The Supreme Court initially ruled in his favour on the elementary principle that criminal law cannot be applied retroactively, as per Article 12(1) of the Pakistan Constitution, which forbids any retrospective legal punishments. However, this ruling triggered widespread protests and sustained pressure from Tehreek-e-Labbaik Pakistan (TLP), Sunni scholars and clerics, as well as the Punjab government, compelling the Court to convene a 'clarification' hearing in August 2024, where it revised its initial ruling and removed the provisions and presumed "concessions" it had made to the Ahmadis in the initial ruling.

The Supreme Court's decision to reverse its ruling under pressure from the TLP and other extremist Sunni elements reflects the erosion of judicial independence and transparency in Pakistan, even at its highest court. It also reveals its susceptibility to the demands of religious-political groups, which demonstrably hold the power to influence legal decisions against individuals from minority groups, such as Mr Sani. Article 6 stipulates the necessity of tribunals capable of providing effective protection against racial discrimination. In the case of Pakistan,

⁵⁵ Ibid.

⁵⁶ Fareed Ahmad, "PAKISTAN: Political Injustice – the Ongoing Persecution of Ahmadi Muslims," Human Rights Without Frontiers, September 2, 2024, <https://hrwf.eu/pakistan-political-injustice-the-ongoing-persecution-of-ahmadi-muslims/>

⁵⁷ Secunder Kermani, "Pakistan Blasphemy: Gunman Shoots Accused Dead in Court," BBC News, July 29, 2020, <https://www.bbc.co.uk/news/world-asia-53582578>

⁵⁸ UN Special Procedures, "Pakistan: Widespread Impunity for Violence and Discrimination against Minorities Must End, Warn UN Experts," OHCHR, 2025, <https://www.ohchr.org/en/press-releases/2025/07/pakistan-widespread-impunity-violence-and-discrimination-against-minorities>

a judiciary that cannot maintain a ruling in favour of an Ahmadi litigant against unsubstantiated pressure from external groups cannot provide that protection.

Recommendations

Building on the evidence set out in the preceding sections, this final section outlines the concrete measures the Committee is respectfully requested to recommend to Pakistan. Each recommendation addresses a specific violation of the Convention documented above, and taken together, they require the State party to move from mere acknowledgement of minority protection to structural reform of the laws, institutions, and administrative practices that this submission has identified as the mechanisms of the continuing breach.

I. Structural Legislative Reform

1. Enact a comprehensive anti-discrimination legislation

Pakistan should adopt legislation that incorporates a definition of racial discrimination that is fully consistent with Article 1(1) of the Convention, explicitly encompassing descent-based discrimination as elaborated in General Recommendation No. 29 and the intersectional discrimination against ethno-religious minorities recognised in General Recommendation No. 32. Pakistan's existing framework focuses on religious rather than racial protection, and the absence of a definition consistent with the ICERD has permitted the State party to treat the discrimination documented above as falling outside the scope of the Convention. A statutory definition that reflects the Convention's terms is therefore a necessary starting point for meaningful compliance with its obligations.

2. Adopt legislation prohibiting caste-based discrimination

Pakistan should prioritise the enactment of legislation that prohibits discrimination on the grounds of caste and descent. The legislation should encapsulate the caste-based discrimination documented in the submission, in particular the confinement of Christians from Scheduled Caste communities to degrading sanitation work and bonded labour and the segregation of Scheduled Caste communities from spaces and opportunities occupied by dominant castes. The enactment of such legislation should be accompanied by the collection and publication of caste-disaggregated data across areas, including employment, education, and judicial protection, without which the State party's assurances of progress remain unsubstantiated. Such data can be collected through initiatives such as a nationwide caste census.

3. Repeal or fundamentally reform the blasphemy laws

Sections 295-A, 295-B, and 295-C of the Pakistan Penal Code, along with the extensions introduced by the Prevention of Electronic Crimes Act 2016 and the Criminal Laws (Amendment) Act 2023, should be repealed. Pending repeal, Pakistan should introduce strictly enforced procedural safeguards, including stringent evidentiary standards for registering a First Information Report (FIR), mandatory senior-level police investigation before registration, bail as a matter of right, and mandatory psychiatric evaluation when mental illness is alleged or apparent. In parallel, Pakistan should also activate Section 211 of the Penal Code, which criminalises false accusations against persons responsible for making baseless blasphemy allegations. The blasphemy framework represents a common instrument that has been

weaponised to encroach on the fundamental rights of all three minority communities, in violation of numerous ICERD provisions. Partial reform of these laws cannot sufficiently substitute for their removal.

4. Repeal Ahmadi-specific legislation

Pakistan should repeal Sections 298-B and 298-C of the Pakistan Penal Code, together with Ordinance XX of 1984. The separate electoral roll for Ahmadis and the requirement that Ahmadi voters declare themselves non-Muslim as a condition of registration should also be abolished. As Section IV(III) establishes, this legislative apparatus constitutes de jure segregation and represents a direct violation of Articles 1, 2(1)(c), 3, and 5(c) of the Convention. The State's inaction on repealing this legislation over the past four to five decades is robust evidence that reform is not possible without sustained international pressure.

II. Protection Against Forced Conversion, Mob Violence, and Extrajudicial Harm

5. Enact federal legislation criminalising forced conversion

The pattern of forced abduction, conversion, and marriage documented in Sections IV(I) and IV(III) requires a criminal prohibition that operates at the federal level. The legislation should require police to register First Information Reports (FIRs) on complaints of abduction and forced conversion, place alleged victims in independent custody rather than that of their alleged perpetrators while proceedings are pending, and prohibit judicial validation of forced conversions and marriages, such as those identified as systemic by UN experts in April 2026. As long as the State's own judicial organs ratify the outcomes of forced conversion, Pakistan will continue to directly participate in and sponsor the discrimination it is obliged to prevent.

6. Establish an effective response mechanism to mob violence

The cases of Joseph Colony (2013), Jaranwala (2023), Sargodha (2024), and Kotli (2024) collectively demonstrate that mob violence following blasphemy accusations is a recurring pattern that inflicts physical harm, displaces minority communities, and has, in certain cases, led to the unjust dispossession of property owned by minorities. To mitigate this growing trend, Pakistan should establish a rapid-response protocol requiring law enforcement to deploy protective resources on receipt of a blasphemy accusation, conduct individual investigations into the perpetrators of mob violence, especially where evidence and warning of impending violence exist, and reverse the recurring pattern under which the accused minority individual is prosecuted while the mob is acquitted and unidentified. Mechanisms should also be put in place to remove law enforcement officials who fail to fulfil their duties as stipulated, creating a strong incentive for prevention moving forward.

7. Hold state officials involved in extrajudicial killings and unlawful acts accountable

The killing of Dr Shahnawaz Kunbar in police custody in September 2024, which the Government of Pakistan later conceded to have been an execution rather than a fabricated armed encounter, has produced no publicly reported prosecution to date. Moving forward, Pakistan should investigate and prosecute the police officers and public officials responsible for this killing and for future comparable cases. It should also apply the same standard to officials involved in the demolition and sealing of Ahmadi and other minority places of worship, including the incidents documented at Daska, Malir, Kotli, and Sargodha. As in

Recommendation 6, law enforcement officials who fail to fulfil their duties as stipulated should be relieved of their duties.

III. The Duty to Proscribe

8. Proscribe organisations that incite racial discrimination against minorities (Article 4(b))

Article 4(b) obliges Pakistan to declare illegal and prohibit organisations which promote and incite racial discrimination. Pakistan proscribed Tehreek-e-Labbaik Pakistan (TLP) in April 2021 in recognition of its role in inciting anti-minority violence, before reversing that proscription in November 2023 under an agreement that further expanded the blasphemy framework. As the Mubarak Sani case demonstrates, TLP's continuing capacity to force the reversal of Supreme Court rulings against Ahmadis is a direct consequence of that reinstatement. Pakistan should re-proscribe TLP and other such organisations whose primary objective is the incitement of racial and religious discrimination, and refrain from further legislative or administrative accommodations of this kind.

IV. Reform Educational Material

9. Remove hateful content from state-issued textbooks (Articles 4(c) and 7)

Pakistan should conduct a comprehensive review of its textbooks and curricula at all state-supervised levels and remove content that degrades or expresses hate towards Hindus, Christians, Ahmadis, and other minority communities. As Section IV(I) has established, the dissemination of state-produced educational content with prejudicial content and motives breaches Pakistan's obligation under Article 4(c) not to promote or incite discrimination, and its parallel obligation under Article 7 to use education as a tool to combat prejudice and facilitate understanding between races.

V. Reform Access to Justice for Minorities

10. Guarantee procedural safeguards for minority defendants

Pakistan should end the routine referral of blasphemy allegations to Anti-Terrorism Courts. This practice has deprived defendants of ordinary procedural protections and instead produced a pattern of forced confessions, prolonged pre-trial detention, and conviction without any proof or evidence. Instead, Pakistan should further protect judicial independence against religious-political pressure of the nature documented in the Mubarak Sani case and foster impartiality. To this end, it should legislate to protect judges hearing minority cases through measures such as increased personal security and non-transferability, establish legal aid centres for poor individuals from minority communities who face prosecution and cannot afford legal support, and adopt affirmative measures to increase minority representation in the judiciary. Pakistan's obligation under Article 6 of the Convention to guarantee effective protection and remedy can only be meaningful once the tribunals and judicial actors charged with providing it can perform that function without external pressure and with impartiality.