

## **Analyzing Labor Policies in Garments Industry and Its Practical Implications Related to Occupational Safety and Health (OSH) in Pakistan**

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### **Abstract:**

*Despite having OSH-related labor laws in place, Pakistan continues to face significant challenges in safeguarding worker health and safety, particularly in the garment industry. This study critically examines the structural and legal limitations of Pakistan's Occupational Safety and Health (OSH) framework through a qualitative, desk-based analysis of secondary sources, including national laws, provincial policies, and international conventions. It uses a comparative legal approach to analyze OSH systems in India and Bangladesh, drawing lessons from their consolidated codes and national labor policies. The findings reveal deep rooted issues in Pakistan's labor landscape: weak institutional enforcement, minimal labor union participation, outdated national policy frameworks, and a severe shortage of inspectors. While India's OSH Code 2020 centralizes multiple labor laws, and Bangladesh's policies support gender inclusion and improved workplace practices, Pakistan's framework remains fragmented and under-implemented. The study recommends clear implementation mechanisms at provincial levels, increased labor representation in policymaking bodies, capacity-building for labor departments, and expansion of training initiatives through*

*institutions like SAA-CIWCE. It also emphasizes the need for transparent inspection systems and increased budgetary allocations to enable policy enforcement. The study contributes to the ongoing discourse on labor reform by offering actionable recommendations to align Pakistan's OSH practices with international standards and enhance worker safety in the garment sector.*

**Keywords:** Labor laws, Occupational Safety and Health (OSH), Labor Union, Factories.

## Introduction

The Pakistani garments industry, constituting 8.5-10% of the GDP and 60% of annual exports, plays a pivotal role in the country's economy (Nasir et. al., 2025). Renowned as the fifth largest global raw cotton producer (World Population Review, 2025), Pakistan produced approximately 8.3 million bales in 2023-24 which declined to 6.7 million bales in 2024-2025 (World Population Review, 2025). Positioned as the fourth largest garments industry in Asia (Data Insight Market, 2025), Pakistan is intricately woven into the global value chains of major European corporations, which strategically outsource production to countries like Pakistan, leveraging low-cost labor (Iqbal, 2020). While this boosts profitability for corporations (Schenimann, 2018), it introduces agency problems by treating labor in the Global South as a mere production factor for the benefit of corporations in the Global North (Coe and Jordhus-Lier, 2010). Working conditions have witnessed a decline across various industries, especially in garment industry in Pakistan (Martinelli, 2019; Human Rights Watch, 2019). Although some labor laws have been enacted at provincial and federal levels, these laws have not proven effective in ensuring Occupational Safety and Health (OSH) at workplaces. Some of the prominent relevant laws include Pakistan Occupational Health and Safety Act 2018, the Punjab Occupational Safety and Health Act 2019, the Sindh Occupational Safety and Health Act 2017, and the Building Code of Pakistan-Fire Safety Provisions 2016.

As per the scope of this research article, it entails an explanation of these labor laws and policies related to OSH and investigates the extent to which these laws and policies have proven effective, their shortcomings, and the major causes that make them ineffective. A major factor is the lack of enforcement and insufficient inspection mechanisms at the factories, which perpetuates the poor standard of working conditions.

On the other hand, some laws such as the Building Code of Pakistan-Fire Safety Provisions 2016 provides specific guidelines related to construction of the building, but it does not include

any subject related to working conditions after the building has been constructed. Same is the situation of other laws that do not focus upon the OSH and its implementation. It is imminently required to improve the enforcement of the existing laws either by formulating relevant new inspecting units or by improving the capacity of the existing inspecting bodies.

The contemporary literatures have immense dearth of research pertaining to investigating the effectiveness of labor laws and policies in garment industry in Pakistan, especially in comparison to neighboring countries i.e. India and Bangladesh. Therefore, this article contributes to the literature of public policy by analyzing the labor policies and laws related to OSH, comparing them with the labor policies and laws in India and Bangladesh, identifying the shortcomings in these laws and policies, investigating major reasons behind the ineffectiveness of these laws, and proposing recommendations to enhance their efficacy in improving working conditions.

### **Research Objectives**

This study aims to contribute to the existing body of knowledge on labor policy reform and occupational safety by critically analyzing the legal and institutional frameworks governing Occupational Safety and Health (OSH) in Pakistan's garment industry. The specific objectives are:

1. To examine the scope, content, and enforcement mechanisms of existing OSH laws in Pakistan relevant to the garment sector.
2. To identify structural weaknesses and implementation gaps in Pakistan's labor legislation related to OSH.
3. To compare Pakistan's OSH framework with that of India and Bangladesh to highlight regional best practices and effective policy mechanisms.

4. To assess the extent to which international labor standards, particularly ILO conventions, are integrated into national policies.
5. To propose evidence-based policy recommendations for reforming Pakistan's OSH laws to enhance worker protection in the garment industry.

### **Methodology**

This study employs a qualitative, desk-based research methodology using secondary sources. The analysis is conducted through a comparative legal review of Occupational Safety and Health (OSH) policies, labor laws, and institutional frameworks in Pakistan, India, and Bangladesh, with a specific focus on the garment industry.

The sources analyzed include:

- National labor laws and OSH-related legislative documents.
- Government policy reports and regulatory frameworks.
- International labor standards and conventions, particularly those issued by the International Labour Organization (ILO).
- Published reports by NGOs, think tanks, and international organizations on workplace safety and labor enforcement in South Asia.

A thematic comparison is conducted to identify convergences, gaps, and best practices across the three countries. The study aims to contribute to academic and policy debates on labor law enforcement and propose actionable recommendations for reform in Pakistan's garment sector.

## Literature Review

The literature review of this section highlights the notable labor laws and policies that have been enacted in Pakistan. It further explains the hazards that exist in the garment industry amid the enforcement of these laws and policies.

In Pakistan, the laws related to OSH have been enacted quite recently. For example, the Sindh Occupational Safety and Health Act 2017, the Sindh Occupational Safety and Health Rules 2019, the Punjab Occupational Safety and Health Act 2019, the Building Code of Pakistan-Fire Safety Provisions 2016, the Sindh Minimum Wages Act, 2015, and the Sindh Factories Act 2015 are the recently enacted laws related to maintaining the health and safety protocols at workplaces (Fair Wear Foundation, 2021).

### 4.1. The Building Code of Pakistan-Fire Safety Provisions 2016

The Building Code of Pakistan-Fire Safety Provisions 2016 serves as a comprehensive guide for workplace owners and managers, outlining safety protocols like fire protection, emergency exits, and building repairs. Mandating the inclusion of emergency exits and ventilation in building maps, the law requires approval from the Authority Having Jurisdiction (AHJ) before construction initiation (Government of Pakistan, 2016). Regional authorities, such as Lahore Development Authority and Capital Development Authority, vary depending on the location. Upon meeting the law's provisions, the relevant regional authority issues a construction permit. For factories handling unstable gases and chemicals, a separate permit is essential, specifying permissible quantities and undergoes inspection by designated inspectors (Government of Pakistan, 2016).

### 4.2. Punjab Occupational Safety and Health Act 2019

The Punjab OSH Act 2019 has approved the establishment of the Punjab Council of Occupational Safety and Health. The council will consist of one Chief Inspector Labor, the

Director General Labor Welfare, and three personnel each from employers, workers, labor department, and organizations related to OSH. According to the Act, the Council has the power to inspect workplaces at least twice a year (Government of Punjab, 2019). Moreover, it has been given the roles to formulate complaint and reporting system via using data, to disseminate awareness of OSH, to provide training to workers, employers, and inspectors, and to advise personnel about using safety equipment who encounter hazardous substances or work environment (Government of Punjab, 2019). The Act mandates the government of the Punjab to ensure safety and health at workplaces by coordinating with the Council of Occupational Safety and Health.

#### **4.3. Sindh Occupational Safety and Health Act 2017**

The Sindh OSH Act 2017 signifies the roles of inspectors. It states that if the inspectors identify any activity or situation at the workplace which may have the tendency to cause harm to the employee(s), then the inspector has the power to prohibit the continuation of that activity. Furthermore, the inspectors can also levy penalties to the workplace officials for violating any rule of this Act (Government of Sindh, 2017). In addition, the Act also approves establishing the OSH Council Sindh. The Council has the authority to review legislation related to OSH in the Sindh province. Moreover, it also has the role to create new policies pertaining to OSH and recommend these policies to the Sindh government. The Council can also provide training pertaining to OSH to the employees and employers (Government of Sindh, 2017).

#### **4.4. The Sindh Factories Act 2015**

The Factories Act provides guidance to the factory management and inspectors in Sindh province for ensuring health and safety in the province. The entire third chapter of the Act is titled 'Health and Safety' that guides the factory management in the province to adopt measures such as, for maintaining cleanliness, ventilation, temperature, lighting, clean drinking water,

elevators, and latrines, etc. In addition, it also instructs the factory management to ensure protection of workers from fumes, dust, humidification, overcrowding, and inflammable gases and chemicals (Government of Sindh, 2015).

#### **4.5. The Bill of Pakistan Occupational Health and Safety Act 2018**

The draft for the Pakistan OHS Act, developed by the American Society of Safety Engineers' Pakistan Chapter, a private organization dedicated to enhancing health and safety in workplaces, aims to collaborate with the government, businesses, civil society, and academia for OSH policy development (ASSP Pakistan Chapter, 2019). While the draft has been submitted to the National Assembly, it awaits enactment. The proposed Act mandates employers to maintain hazard-free workplaces and suggests the formation of the Pakistan OHS Council, chaired by the Prime Minister, with representation from provincial Chief Ministers, engineering organizations, and the Chamber of Commerce (Pakistan Chapter of the American Society of Safety Engineers, 2018). Notably, the bill emphasizes the establishment of coordinating bodies to facilitate effective implementation with provincial governments (Pakistan Chapter of the American Society of Safety Engineers, 2018).

#### **4.6. National Labor Policy 2010**

There are six labor policies presented at the national level so far i.e., in 1955, 1959, 1969, 1972, 2002, and 2010 (Government of Pakistan, 2010). The last Labor Policy that was presented in 2010 calls for the protection of fundamental rights of laborers from exploitation at the workplace. It also mandates that the workplace managers should provide trainings to the workers for ensuring safety at the workplace (Government of Pakistan, 2010).

A major contribution made by the Pakistan Labor Policy 2010 is the emphasize on bringing gender equality in terms of the provisions of equal rights to women at workplace. It particularly calls for payment of equal wages to women as that of men at every workplace (Government of



Pakistan, 2010). The impact of this policy has been noticed in the findings of the primary research in this study as the female workers who were interviewed reported their wages in the same income bracket as that of the male workers. Promoting equal pay is a fundamental right of workers and this right has been promulgated in the Equal Remuneration Convention, 1951 (No. 100).

#### **4.7. Provincial Labor Policies**

In Pakistan, the Government of Punjab and the Sindh Government have devised labor policies for the labor of their respective provinces.

##### **4.7.1. Punjab Labor Policy 2018 and its Key Recommendations Related to OSH**

The government of Punjab introduced the labor policy in 2018. The Punjab Labor Policy recommends the legislation of new law pertaining to the implementation of OSH standards at workplaces in the province in accordance with the ILO Convention 155. It further suggests that the workplaces should adopt risk-based strategies to assess all kinds of hazards (Government of Punjab, 2018). It further gives the suggestion to implement a database of workplaces entailing hazardous working conditions.

##### **4.7.2. Sindh Labor Policy 2018 and its Key Recommendations Related to OSH**

The Government of Sindh introduced its inaugural labor policy in 2018, outlining strategies for enhancing working conditions and implementing OSH standards across the province. The policy highlights collaborative efforts with the International Labor Organization and labor and employer representatives to execute a safety and health program. It further introduces the "Joint Action Plan for Promoting Safety and Health at Workplace in Sindh" (Government of Sindh, 2018).

Additionally, the Sindh Labor Policy proposes the establishment of a tripartite Provincial Health and Safety Council, inclusive of labor, employer, and government representatives.

Recent reports confirm the establishment of this council, conducting its inaugural meeting in October 2019, with members including the chairman of PILER, Secretary Labor Department of Sindh, Chairman Sindh People's Labor Bureau, and the VP and Secretary General of Employers Federation of Pakistan (EFP, 2019). Aligning with this council, the policy advocates for the formation of Tripartite Monitoring Committees at district levels to oversee labor law implementation and address issues like wages and working conditions (Government of Sindh, 2018).

#### 4.8. Current Situation of Working Conditions

Despite the laws and policies, the working conditions are poor, especially in the garment industry. Notably, there are six kinds of hazards that exist in the garment industry. These include Biological, Chemical, Electrical, Physical, Psychological, and Ergonomic hazards (Kirschner, 2025). The table below summarizes them.

*Table 1: Workplace hazards in the garment industry*

Sr. No.	Hazards	Explanation
1.	<b>Biological hazards</b>	These are caused by bacteria, fungi, and viruses. The workers often contract them due to poor ventilation and cleanliness of the work environment and consequently, fall sick.
2.	<b>Chemical hazards</b>	The workers are exposed to harmful chemicals which can cause severe burns, skin allergies, or breathing problems due to absence of safety equipment.
3.	<b>Electrical hazards</b>	Electrical safety is also not fully secured at the factories.

4.	<b>Ergonomic hazards</b>	Poor posture, regular repetitive tasks, improper work settings, etc. cause ergonomic hazards. Back, shoulder, and neck pain, etc. are some examples of consequences.
5.	<b>Physical hazards</b>	Physical hazards include injuries caused due to improper work settings. For example, slips due to wet floor, or injury caused due to handling sharp objects, etc.
6.	<b>Psychological hazards</b>	Psychological hazards include burnouts, mental fatigue, or weakness of mental health due to working for long hours or due to other concerns such as facing workplace harassment or abusive language, etc.

Javaid and Riaz (2024) conducted one thorough research on studying working conditions in the garment industry. They conducted 76 interviews with different participants including laborers, their supervisors, managers, factory owners, labor union representatives, and government department officials working in the labor department. The findings of their research revealed that the working conditions are poor in the garment factories. They found that the laborers faced high noise and dust caused by machines which was causing them hearing and breathing problems. Likewise, the verbal and sexual harassment was also common, especially the latter faced by female workers. The wages of workers were also very low as several workers were found to be working at lower than the minimum wage set by the government (Javaid and Riaz, 2024).

Furthermore, they found that the OSH implementation was minimal as no personal protective equipment (PPE) and safety manual were found at the factories. Furthermore, laborers have no awareness of the term occupational safety and health, its importance, and its implications.

Likewise, the research found that the inspections at the factories to inspect working conditions and OSH were mostly fake and insufficient (Javaid and Riaz, 2023).

## **5. Findings: Issues in the OSH related Labor Laws and Policies:**

This sub-section includes an elaboration of the issues in the laws related to OSH.

### **5.1. Weak or Missing Institutional Mechanism**

The lack of required institutional mechanism has made the OSH related labor laws ineffective yet. For instance, the Punjab OSH Act 2019 majorly rests upon the functions of the Punjab OSH Council for extending health and safety at workplaces in the province (Government of Punjab, 2019). However, the council has not started working yet. Similarly, the Sindh OSH Act gives powers to the inspectors while it ignores the fact that there are only seventy inspectors to cover inspections in all factories and other workplaces in the province (Fair Wear Foundation, 2021). Thus, the Act does not mention how the capacity of inspections can be upgraded and how the manpower shortage of inspectors can be fulfilled. Likewise, it has been seven years since the Bill for Pakistan OSH Act 2018 has been submitted to the National Assembly for enactment, but the Assembly has not yet made any developments on the Bill. This further highlights the lack of speedy legislation in the country.

On the other hand, in the policy arena, the National Labor Policy 2010 lacks clear timelines and parameters for implementing recommendations, and it doesn't address funding for workplace improvements. It appears as a collection of suggestions without specifying responsible entities or implementation methods. In Punjab, the Labor Policy doesn't outline a framework for implementing recommendations, leaving uncertainties about which department will conduct inspections and enforce policies (Government of Punjab, 2018). The role of the Punjab Labor Department in inspections and policy enforcement is unclear, and there's no mention of capacity building. The Punjab Labor Policy suggests the SAA Centre for the

Improvement of Working Conditions and Environment (CIWCE) for OSH training. However, it lacks details on funding, and the capacity of this single institute in Lahore to train a large workforce across various industries is unclear. The Sindh Labor Policy faces challenges, such as the feasibility of the Labor Department's limited inspectors conducting widespread inspections or the tripartite council overseeing inspections at numerous factories with its limited membership (Fair Wear Foundation, 2021). Clarifications and detailed plans are needed for effective implementation.

## **5.2. Internal Contradictions in Labor Policies**

The National Labor Policy 2010 does not explain any measures to improve the working conditions in any industry.<sup>1</sup> Likewise, it does not entail any explanation or plan for the implementation of the OSH standards at the workplaces, which makes the policy ineffective pertaining to improving working conditions and ensuring the implementation of OSH standards at workplaces. On the other hand, the Sindh Labor Policy has one internal contradiction and that is related to the representation of labor, as described below.

## **5.3. Futile Inspections: An Issue in Enforcing the Laws**

During the Musharraf regime, an amendment to the Industrial Relations Ordinance 1969 halted workplace inspections, resulting in a lack of oversight of working conditions. It was only after the tragic Baldia Town factory fire in 2012, claiming 260 lives, that the government recognized the necessity of reinstating inspections (Azeem, 2021). While inspections resumed, they often fall short in substance. Despite receiving safety certificates, workplace incidents, such as fires causing injuries and fatalities, persist. The Baldia factory, certified with SA8000 by an Italian company RINA, experienced a catastrophic fire shortly after certification (Gayer, 2019). This tragedy revealed a lack of emergency protocols, raising questions about the certification

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<sup>1</sup> For details, see the Pakistan Labor Policy 2010.

process. The Baldia factory incident is deemed the second most tragic in the world, following the Rana Plaza incident in Bangladesh. The collapse of Rana Plaza in 2013 resulted in 1134 deaths and numerous injuries, marking one of the worst workplace disasters in history (ILO, 2022). These incidents underscore the critical need for effective workplace inspections and certification processes.

#### **5.4. Issue related to Labor Participation**

As there is only 1 percent of labor that is unionized in the country, therefore, the labor representation lacks at both the federal and provincial levels (Azeem, 2021). This issue has not been touched upon in labor laws in Pakistan. The laws mentioned above endorse formation of councils that will include members from employers and employees, but do not mention as who would represent employees in the absence of labor unions.

Likewise, in the policy arena, the Sindh Labor Policy has formed the tripartite Provincial Health and Safety Council. As per the breakdown, this council includes only one member as the representative of labor, that is, the chairman of PILER (EFP, 2019). It does not have any members from the labor union, which highlights the lack of labor representation in the council. PILER is a labor research institute, and it is not a labor union (PILER, 2022). Thereby, the Health and Safety Council needs to have members who are from the labor unions or who are the leaders of laborers. In this way, the realistic concerns of the laborers can be presented to the council that includes representatives from the employers and from the government. Similar issues are present in the Punjab Labor Policy that is silent regarding the representation of labor. Likewise, the National Labor Policy has not even addressed the matter of lack of representation of labor.

### 5.5. Comparison with the Laws and Policies of Neighboring Countries

When comparing Pakistan's labor laws with those of other countries, distinct variations emerge. India, for example, has implemented the Occupational Safety, Health, and Working Conditions Code (OSHWC) 2020, consolidating 13 labor laws and emphasizing workplace health and safety (Government of India, 2020). Unlike Pakistan, India prohibits child labor below the age of 18. The new Code outlines specific provisions for various aspects of occupational safety and health, addressing explosives, chemicals, safety ropes, and workplace accidents (Government of India, 2020). However, it has limitations, such as excluding workplaces with fewer than 20 employees from certain provisions and restricting OSH-related cases to higher courts only. In contrast, Bangladesh's labor laws primarily rely on the 2013 Bangladesh Labor Act, with amendments to the 2006 Bangladesh Labor Act. While it addresses worker status, termination, and compensation, there are no specific laws related to occupational safety and health (Government of Bangladesh, 2013). Pakistan occupies a middle ground, having specific labor laws but with room for improvement in aligning with international standards. The table below further summarizes this analysis.

*Table 2: Comparison of OSH Laws in Pakistan, India, and Bangladesh (Sources: text of labor laws of India, Pakistan, and Bangladesh)*

<b>Feature</b>	<b>Pakistan</b>	<b>India (OSH Code 2020)</b>	<b>Bangladesh (Labor Acts 2006/2013)</b>	<b>Remarks</b>
Dedicated OSH Law	Yes (Provincial OSH Acts)	Yes (Consolidated OSH Code)	No (Part of broader labor acts)	Pakistan laws vary by province

Enforcement Mechanism	Weak, unclear implementation	Clear inspection & enforcement roles	Limited but present	India's enforcement is centralized
Labor Representation in Policy	Very limited	Some tripartite councils	Improving but union presence remains weak	Needs strengthening in Pakistan
Child Labor Prohibition (under 18)	Partial	Strongly enforced	Weak enforcement	India more compliant with ILO standards
Gender-Inclusive Workplace Policies	Weak	Moderate	Strong in policy	Bangladesh has supportive regulations

In India, the OSH Code 2020 has replaced various labor legislations, becoming the primary basis for labor laws and policies (Ministry of Labor & Employment, 2021). The National Policy on Safety, Health, and Environment at Workplace (NPSHEW) 2009 preceded the OSH Code, emphasizing accident prevention, a goal retained in the OSH Code 2020.

Bangladesh's National Labor Policy 2012 addresses health and safety concerns, aiming to eliminate gender-based discrimination among workers. Favorable regulations in the 2006 and 2013 Labor Acts have improved employment opportunities and wages for female workers in Bangladesh (Ministry of Finance, 2022). Similar progress is observed in Pakistan through



initiatives under the National Labor Policy, encouraging employers to hire female workers but the work environment has not become suitable yet in Pakistan (Javaid and Riaz, 2023).

## 6. Recommendations

This section of the article presents new suggestions for improving the working conditions and ensuring OSH compliance at workplaces.

### 6.1. Addressing Shortcomings in Labor Policies

The national and provincial governments have presented labor policies to enhance working conditions; as explained above, these policies exhibit inadequacies. Their shortcomings must be addressed. A meticulous review of policies can furnish labor departments with a comprehensive and effective theoretical framework to oversee workplace conditions.

For instance, detailed explanations of the implementation mechanism in the Punjab Labor Policy should be provided, emphasizing the role of the provincial labor department in improving working conditions. Similarly, the Sindh Labor Policy requires attention to inadequacies, such as the challenge of a limited number of inspectors covering thousands of factories. For instance, in 2022, 19,300 (small, medium, and large – all inclusive) factories were operational in Sindh with only 70 inspectors to cover them (Tribune, 2022). This implied that one inspector was expected to cover at least 276 factories. No significant efforts have been made by the provincial government to increase the number of inspectors. The existing 70 inspectors can only cover 9,240 factories, indicating a need for an additional 76 inspectors, incurring an extra cost.

The policy should specify the representation of laborers in the tripartite council. Currently, only one member of PILER serves as the representative, lacking the true representation of laborers (EFP, 2019). Encouraging the formation of centralized and democratic labor unions is crucial

for authentic representation. Trade unions formed on a factory basis are deemed ineffective (Azeem, 2021).

Furthermore, the national labor policy of 2010 has become outdated with the enactment of provincial and national Occupational Safety and Health laws. The national labor policy should guide the implementation mechanisms of these laws, which currently lack clarity at the national and provincial levels, posing challenges for laborers.

## **6.2. Empowering the Labor Department**

A crucial recommendation involves enhancing the technical and financial capabilities of the labor department for efficient monitoring of working conditions. It is imperative to bolster the human resource capacity by doubling the number of inspectors to ensure comprehensive inspections throughout the province and industries (Fair Wear Foundation, 2021). To gather accurate data on working conditions, the labor department should conduct surveys, potentially employing independent researchers or institutes like Gallup for transparency. The data collected should cover aspects such as the availability of protective equipment, safety manuals, social security facilities, and key issues affecting workers. Results of inspections should be stored on a cloud-based platform, ensuring accessibility and easy updates. To enhance transparency, the department can make inspection data publicly available online, utilizing technology for effective record-keeping and inspection improvements.

## **6.3. SAA-CIWCE**

The Saeed Ahmed Awan Center for Improvement of Working Conditions and Environment (SAA-CIWCE) is working to improve the implementation of occupational safety and health standards at the workplace.<sup>2</sup> The Punjab Labor Policy 2018 mentions that the SAA-CIWCE

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<sup>2</sup> For more details about SAA-CIWCE, visit: <https://ciwce.org.pk/saaciwce/our-activities/>

will provide training to the employees and employers for improving OSH implementation at workplaces (Government of Punjab, 2018). As of now, SAA-CIWCE has provided training to employees in only a few workplaces. Therefore, it is suggested that the government of Punjab should enhance the capacity of the SAA-CIWCE for improving working conditions.

#### **6.4. Funds**

It is pertinent to mention here that adequate amount of funds will be needed by the provincial governments to implement measures for improving the quality of working conditions in the garments industry. For instance, hiring new inspectors will particularly require arranging sufficient funds for giving salaries to the newly hired inspectors. Moreover, other arrangements such as regular inspections and training of employees will also require availability of funds. For instance, in Punjab, according to the provincial labor policy, the SAA-CIWCE will be responsible for providing training related to the occupational safety and health of the employees at workplaces.

#### **7. Conclusion**

Although the laws and labor policies related to the implementation of OSH have been implemented at the national and provincial levels, they lack enforcement mechanisms primarily due to the powerlessness of the government's labor departments in front of the powerful owners of the workplaces and due to the lack of human and financial resources of the department. Corruption in the form of bribes is another issue that often leads to the approval of workplaces in the documents of governments despite the presence of safety hazards in such workplaces. Shortcomings in the existing labor policies should be addressed, new legislation for strengthening labor unions should be carried out, and capacities of the labor department and the SAA-CIWCE should be enhanced so that they can monitor the working conditions of all workplaces and could also provide training to the workers and to the employers. In addition,

the ILO conventions pertaining to the OSH implementation should be ratified so that their guidelines could be adopted actively. Also, awareness about OSH should be given to the public and to the laborers. Adequate amounts of funds should be made available for recapacitating the labor department and the CIWCE.

## 8. References

- ASSP Pakistan Chapter. (2019). Welcome To ASSP Pakistan Chapter. *American Society of Safety Professionals – Pakistan Chapter*. Retrieved from: <<http://assp.org.pk/>>
- Azeem, M. (2021). The KiK Case: A Critical Perspective from the South. *Transnational Legal Activism in Global Value Chains*. pp. 279–298.
- Coe, N. M. and Jordhus-Lier, D. (April-2010). Constrained Agency? Re-evaluating the Geographies of Labour. *Progress in Human Geography* 34(1). DOI:10.1177/0309132510366746
- Data Insight Market. (2025). Textile Industry in Asia 2025-2033 Overview: Trends, Competitor Dynamics, and Opportunities. *Data Insight Market*. Retrieved from: <<https://www.datainsightsmarket.com/reports/textile-industry-in-asia-18616#>>
- EFP. (05-Oct-2019). First meeting of Sindh Tripartite Committee for Implementation of Labor Laws. *Employers' Federation of Pakistan*. Retrieved from: <<https://efp.org.pk/first-meeting-of-sindh-tripartite-committee-for-implementation-of-labor-laws-2/>>
- Fair Wear Foundation. (2021). Pakistan Country Study 2021. *Fair Wear Foundation*. Retrieved from: <<https://api.fairwear.org/wp-content/uploads/2021/06/2021-CS-PAKISTAN.pdf>>
- Gayer, L. (2019). Chapter 11: Putting out the Baldia factory fire: how the trial of Karachi's industrial capitalism did not happen, In, Harris-White, B. and Michelutti, L. (2019). *The Wild East: Criminal Political Economies in South Asia*. UCL Press.
- Government of Bangladesh. (2013). Bangladesh Labour Act 2013. *Government of Bangladesh*.
- Government of India. (2020). The Occupational Safety, Health And Working Conditions Code, 2020. *Ministry of Labour and Employment*. Government of India.

Government of India. (2020). Code on Social Security. *Ministry of Labour and Employment*.

Government of India.

Government of Pakistan. (2010). Pakistan Labor Policy 2010. *Government of Pakistan*.

Retrieved from: < <http://www.eobi.gov.pk/announcement/labour+poiley+2010.pdf>>

Government of Pakistan. (2016). Building Code of Pakistan Fire Safety Provisions – 2016.

*Pakistan Engineering Council*, in collaboration with, *National Disaster Management Authority*.

Government of Punjab. (2018). Punjab Labor Policy 2018. *Government of the Punjab*.

Retrieved from: < <https://labour.punjab.gov.pk/system/files/Labour%20Policy%202018.pdf>>

Government of the Punjab. (2019). The Punjab Occupational Safety and Health Act 2019.

*Government of the Punjab*.

Government of Sindh. (2018). Sindh Labor Policy 2018: “A Framework of Industrial Relations,

Social and Economic Well-being of the People of Sindh”. *Labor and Human Resources Department. Government of Sindh*. Retrieved from:

<[https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-islamabad/documents/publication/wcms\\_647697.pdf](https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-islamabad/documents/publication/wcms_647697.pdf)>

Government of Sindh. (2017). Sindh Occupational Safety & Health Act, 2017. *Government of*

*Sindh*.

Government of Sindh. (2015). The Sindh Factories Act, 2015. *Provincial Assembly of Sindh*.

Karachi.

Human Rights Watch. (2019). “No Room to Bargain”. *Human Rights Watch*. Retrieved from:  
< <https://www.hrw.org/report/2019/01/23/no-room-bargain/unfair-and-abusive-labor-practices-pakistan>>

ILO. (2022). The Rana Plaza Accident and its aftermath. *International Labour Organization*. Retrieved from: <[https://www.ilo.org/global/topics/geip/WCMS\\_614394/lang-en/index.htm](https://www.ilo.org/global/topics/geip/WCMS_614394/lang-en/index.htm)>.

Iqbal, I. F. (Mar-2020). A Gendered Analysis of the Ready-Made Garments (RMG) *Sector of Bangladesh: A Paradox of Empowerment and Dis-empowerment*. College of Liberal Arts and Social Sciences, DePaul University.

Javaid, N. and Riaz, S. (2023). Exploring the Working Conditions in the Garments Industry: Identifying the Occupational Safety and Health (OSH) Status in the Garments Industry In Pakistan. *Journal of Cultural Perspectives*. Vol. 2. No. 2. DOI: 10.63672.

Kirschner, J. (2025). 6 Types of Hazards in the Workplace That All Employees Need to Know for Health & Safety. *Trojan Safety*. Retrieved from: <<https://www.trojansafety.com/blog/types-of-hazards-workplace/>>

Martinelli, K. (7-Jan-2019). A Guide to the Most Common Workplace Hazards. *High Speed Training*. United Kingdom.

Ministry of Finance. (2022). Chapter 12 – Ministry of Labor and Employment. *Ministry of Finance, Bangladesh*. Section 4.2.

Ministry of Labor & Employment. (2021). New Labor Code for New India. *Ministry of Labor & Employment*. Government of India. Retrieved from: <[https://labour.gov.in/sites/default/files/Labour\\_Code\\_Eng.pdf](https://labour.gov.in/sites/default/files/Labour_Code_Eng.pdf)>

- Nasir, S., Ali, M., Irshad, M., Arshadullah, Wazir, S., and Islam, M. (2025). 'Critical Evaluation of Textile Industry of Pakistan and Way Forward.' *Khyber Journal of Public Policy*, Spring 2025, Volume: 4, Issue:1 (Special).
- Pakistan Chapter of the American Society of Safety Engineers. (2018). Pakistan Occupational Health and Safety Act, 2018. *Pakistan Engineering Council*.
- PILER. (15-Jan-2022). Our Organisation. *Pakistan Institute of Labour Education & Research*. Karachi. Retrieved from: <<https://piler.org.pk/our-organisation/>>
- SAA-CIWCE. (2024). SAACIWCE is a pioneer institution in Pakistan providing professional services in the field of occupational, safety, health and environment. About SAACIWCE. *SAA Centre for the Improvement of Working Conditions and Environment (CIWCE)*. Retrieved from: <<http://ciwce.org.pk/saaciwce/about-us/>>
- Schenimann, C. (2018). Corporate Outsourcing to Take Advantage of Cheap Labor in Developing Countries. *Liberty University*.
- Tribune. (15-Mar-2022). Sindh to enhance number of SEZs. *The Express Tribune*. Retrieved from: <<https://tribune.com.pk/story/2347943/sindh-to-enhance-number-of-sezs>>
- World Population Review. (2025). 'Cotton Production by Country 2025'. *World Population Review*. Retrieved from: <<https://worldpopulationreview.com/country-rankings/cotton-production-by-country>>