

COMPARISON OF INTERNATIONAL STANDARDS OF LABOR LAWS AND THEIR DEVELOPMENT IN PAKISTAN

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ABSTRACT

This article examines the development of workplace regulations within Pakistan against global benchmarks, notably those established by the Global Employment Commission (GEC). It explores the historical background of global employment directives and evaluates the country's legal, statutory, and organizational structures following the 18th Charter Change. The assessment covers domains including collective organizing and joint negotiations, coerced work, underage employment, parity and fairness, remuneration, occupational settings, workplace security, and social coverage. The findings indicate that Pakistan has achieved noteworthy legal headway toward international employment standards through constitutional safeguards and endorsement of core GEC treaties. But there is a long way to go between the law and implementation. Restrictions on effective protection persist through informal employment, poor labor inspection, weak collective bargaining, gender inequality, lack of social security coverage, workplace hazards, child and bonded labor, institutional fragmentation, and lack of access to labor justice. The article concludes that, as Pakistan faces a growing enforcement challenge, it cannot find a shortage of rules. To achieve effective harmonization, its three elements strengthening of institutions, improving labor inspection, extending social protection, strengthening the coordination between the Federal and Provincial governments, and targeted legislative reform must all be put in place.

Keywords: International labor standards, labor laws, Pakistan, ILO, labor rights, child labor, forced labor, gender equality, occupational safety, social protection, informal employment, decent work.

INTRODUCTION

Labor law is at the heart of the modern legal system, since it regulates relationships in which one party's livelihood depends structurally on the decisions of the other. The employment relationship is unique among other relationships in private law in that the employer is often in a stronger bargaining position, better positioned to have information about the job, and more economically secure than the individual worker (Fatima, 2023). Labor law has been created to balance this out and to make an agreement to exchange labor a contractual

relationship with minimum expectations of dignity, safety, and fairness. This function has a wider scope than commercial regulation and is not divorced from the realms of human dignity, social justice, and the sharing of the benefits of economic development. In the absence of a strong and well-enforced labor law, economic growth is often uneven, and the resulting development does not always improve the living conditions of working people, who are the main drivers of this development (Shahid & Syed, 2023).

In the early twentieth century, a global labor law system developed in response to the realization that labor market conditions in one country have an impact on the competitive conditions in another and that unregulated labor markets tend to be a "race to the bottom. In 1919, the International Labor Organization was founded, making a conscious effort to internationalize minimum labor standards, with a unique tripartite structure that included representatives of governments, employers, and workers, so that social progress would not be a disadvantage (Amber & Chichaibelu, 2023). This international framework is relevant in Pakistan in its current context and will have a direct impact on the country. Pakistan has been a member of the ILO since 1947 and has ratified many international labor conventions, including the eight basic ILO conventions (Naheed et al., 2024). Its labor laws, however, are a unique and complex legacy; they are the ones that were passed during the colonial era and have been carried over since independence, and which were the subject of federal legislation during a succession of martial and civilian regimes, until a significant constitutional change in 2010 transferred the power to enact labor laws from the federal parliament to the four provincial assemblies. (Moulabuksh et al., 2022).

The job market that Pakistani labor law is now tasked with regulating is also far more complex than the one to which the various laws and statutes that underpinned labor law in Pakistan in the 1930s and 1960s were meant to apply. The process of economic integration around the world has changed the nature of production, and the flow of money (Shah Gilani et al., 2022). This leaves the vast bulk of Pakistan's working population in the informal sector, where they are not registered, inspected, or covered by social-security systems, which are geared towards a factory worker with a permanent formal position. As a result of technological change, the nature of work has taken on a new form – platform-mediated and gig work, which is still a relatively small part of the labor market but is characterized by unresolved questions of job classification in current legislation. Migration (both domestic and international) and bonded and child labor in agriculture, brick kilns, and domestic labor also add layers of complexity.

These changes do not leave unaddressed the traditional issues arising under labor law, including freedom of association and safe working conditions; they have rather added new worries to the old ones (Shah et al., 2022).

Against this background, the present article will analyze the relationship between international labor standards and Pakistan's labor law framework in a comparative and critical manner. The main thrust is not to examine each of the two laws separately, but to compare them directly: what the international laws demand, what Pakistan's law offers, where they are the same, where they differ, and whether the differences are legislative (Alam, 2023). The discussion then moves on to structural deficiencies and new challenges that inhibit the practical implementation of these standards in Pakistan, and eventually to Pakistan's overall situation vis-à-vis international standards and the prospects for achieving greater convergence (Anwer et al., 2023).

INTERNATIONAL FRAMEWORK AND EVOLUTION OF LABOR STANDARDS

Historical Evolution of International Labor Standards

It was not only the ILO's view that labor conditions deserved international regulation; it was the view held prior to the ILO itself. During the period of industrialization in the 1800s, child labor was common, factory work conditions were hazardous and long hours of work common, which created early reform movements within individual states; however, reformers soon realized that national regulation without standards would put compliant industries in a disadvantageous competitive position against those in unregulated jurisdictions (Batool, 2023). Together with the social chaos of the First World War and the ensuing fear of revolutionary unrest, this provided the political impetus for the establishment of the ILO under the Treaty of Versailles in 1919 (Thebo et al., 2024).

During its initial decades, the Global Labor Organization's attention was largely consumed by narrow, specialized agreements addressing working hours, evening labor for women and juveniles, earliest entry points into factory jobs, and employee injury compensation. This was a time of "protection" of labor law, when the state stepped in

to save vulnerable groups of laborers from the excesses of industrial labor. This agenda began to expand during the interwar period and continued to expand after World War II (Rashid, Faridi, et al., 2024). This evolution appeared again in the 1998 Global Labor Organization proclamation concerning basic entitlements and workplace principles, which outlined four categories: organizational liberty and joint negotiation, eradication of compulsory work, ending of underage employment, and removal of bias, and designated these as core, relevant to every ILO signatory nation regardless of their ratification status regarding the treaties.

The conceptual transition is an example of a broader trend in international labor law, which has been moving from a minimalist approach, protecting only against the most severe forms of labor exploitation, to a rights-based approach that extends labor rights to the human-rights framework as a whole (Rashid, Mehmood, et al., 2024). Later agreements, including the 1981 accord addressing all forms of gender-based prejudice, the maternity-protection conventions, and, later, the social-security conventions, further developed the rights-based approach into new substantive fields. In the early 21st century, the ILO's norms moved beyond the traditional focus on industrial relations and introduced concepts of social protection floors, gender equality, and, via the Fair Employment Initiative introduced in 1999, the merging of distinct notions of job generation, basic coverage guarantees, workplace entitlements, and stakeholder consultations as complementary objectives (Rashid & Faridi, 2023). This historical background is important to the assessment of Pakistan's relationship with international labor standards because its national law, which came into existence mostly during the early postcolonial period and bears strong marks of the earlier, protective, stage of the evolution of international labor standards, has had to adjust to the rights-based, decent-work stage of the evolution, albeit somewhat unevenly.

Core International Labor Standards and Fundamental Workers' Rights

The modern international labor law system is based on the ILO's eight fundamental conventions,

which, in 2022, were restructured into ten fundamental conventions, with a further convention on occupational safety and health added as a fundamental right. Convention No. 87 provides for freedom of association and the right to form and join organizations of their own choosing without authorization and without being dissolved or suspended by the administration. This right is considered a basic one since it is essential to exercising almost all other rights: if workers cannot organize as a collective, they individually have little power to negotiate wages, working conditions or protection (Kishwar et al., 2023).

The standard is especially relevant to the situation in South Asia where bonded labor, especially with terms of debt bondage in agriculture and brick kilns, continues despite being legally prohibited. Both Treaty Number 138 and Convention Number 182 set a universal baseline age for employment (usually not lower than the end of mandatory education) and outright prohibit the most severe forms of juvenile labor (such as bonded servitude, illegal transfers, and hazardous jobs that could jeopardize a young person's security, well-being, or moral development) (Maqsood et al., 2024). Agreement No. 100 and Convention No. 111 require equal terms and opportunities by eliminating discrimination in remuneration and occupation (equal pay for equal work) and prohibit any discrimination based on race, sex, religion, and any other status that may lead to inequality. OSH, which has been discussed in sectoral and general conventions and by the general conventions and has been elevated to the level of fundamental conventions (Conv. 155 and Conv. 187), calls on the states to establish coherent national policies on occupational hazards and ensure functioning systems of workplace inspection (Malhi, 2024).

In addition to these basic rights, a wide range of ILO conventions and recommendations exist on social protection (including old age and disability benefits, sickness benefits and maternity benefits); fair employment (characterized as meaningful activity undertaken within settings of liberty, justice, protection, and personal worth); alongside category-specific protections for particular occupations (such as household helpers, remote laborers, and mariners). These instruments are important because they are not only substantive but

also serve as internationally accepted baselines for gauging national labor systems, such as Pakistan's. The GLO's oversight systems allow for continuous, albeit imperfect, monitoring of compliance. These include the obligation to submit progress and the specialist panel's evaluation method for treaty adherence. The endorsement process creates mandatory obligations under global legal regimes (Saleem, Ansari, et al., 2024).

Contemporary Development of International Labor Standards

Globalization has had a significant impact on the modern era of international labor standard-setting. Production has been spread out around the global supply chain, reducing the ability of any single state to control labor conditions within its borders: capital and orders can go elsewhere for cheap labor and lax enforcement (Saleem, Mahmood, et al., 2024). But modern standard-setting is also broader in scope, to cover workers not traditionally included in the mainstream of labor protection. The extension of core worker rights to domestic workers, overwhelmingly female, to limits on working hours, minimum wage coverage, and social security provisions, in the 2011 Domestic Workers Convention, No. 189, has been overwhelmingly successful. In the same way, increased awareness of the extent of home work and informal work has led to attention given to piece-rate and subcontracted work outside the realm of formal work, which is especially relevant in the South Asian context for garment and craft production, in the Convention on the Elimination of All Forms of Discrimination against Women, No. 177, 1996 (Holzberg, 2023). The first international treaty to define violence and harassment as a distinct concern of labor rights and to call for specific legal action, the 2019 Convention on the Elimination of All Forms of Discrimination against Women in the World of Work, No. 190, has further highlighted the issue of gender equality and workplace discrimination. The attention of migrants and vulnerable workers has also been heightened as a result of their scale of international labor flows and their vulnerability to practices of exploitative recruitment and to restrictive sponsorship systems (Sitzia & Lopez, 2023).

DEVELOPMENT AND CONSTITUTIONAL FOUNDATIONS OF LABOR LAWS IN PAKISTAN

Historical Development of Labor Legislation in Pakistan

The present Pakistan labor law regime is a colonial legacy from the past. British India evolved its own collection of factory, trade-union and industrial-dispute laws in the late 19th and early 20th centuries, partly on the basis of real concerns about industrial welfare and partly for the reasons of orderly production for the benefit of the empire (Helfen, 2023). Pakistan retained some of these laws upon Independence in 1947, including statutes such as the Trade Unions Act 1926, Factories Act 1934, Payment of Wages Act 1936, and Workmen's Compensation Act 1923, a few of which continue to exist in Pakistan's Provinces today under the doctrine of Legal Continuity. As a legacy of this colonial history, Pakistani labor law was built with an early institutional structure focusing on factory inspection, minimum industrial-relations machinery, and compensation for injuries in the workplace, but which was mostly limited to the factory-based industrial sector and not agriculture or domestic work, the majority of the nation's work (Paul, 2024).

All successive waves of reform led to a complex framework of labor laws by the early twenty-first century, which was paper-thin and had been spread throughout dozens of separate laws that differed in scope, application, and level of protection across sectors, with a strong emphasis on the formal industrial workforce, which has historically been a minority of the total employed population. The current multi-layered structure is the result of historical evolution and serves as the background against which the devolution of labor as a legislative topic in 2010, as discussed in the next section, can be analyzed (International Labor, 2024c).

Constitutional Protection of Labor Rights in Pakistan

The Constitution of Pakistan, 1973, lays the groundwork of the legal structure under which labor law functions and places some labor-related guarantees as fundamental rights, which can be enforced by filing a constitutional petition, while others are non-justiciable as directives of policy, but

have a significant impact on legislative and policy priorities. Clause 17 establishes the fundamental entitlement to organize in trade groups, subject to restrictions that are permissible for the protection of Pakistan's sovereignty, civic order, or ethical standards. While this clause provides a constitutional basis for the freedoms of workplace association, historically it has provided a broad basis for statutory limitations on union entitlements in particular industries for national security, public stability, or moral welfare (International Labor, 2023b).

Clause 25 states that all persons are equal before the law and entitled to equal legal protection, and that discrimination based on gender alone is prohibited; however, the government may adopt protective measures for women and children. This is a fundamental component of the anti-discrimination at the workplace clause in the constitution, but the overall scope of this clause means that it is highly dependent on the enactment of legislation (International Labor, 2022b). Article 11 explicitly prohibits slavery, forced labor and traffic in human beings, and, specifically, prohibits work for children under the age of fourteen years in factories, mines or work of any nature that is hazardous, thus restricting the minimum legal age stated in the Constitution of Pakistan, as compared to some international standards, even if the enforceability of this provision does not guarantee the children the protection of this provision.

There are also other fundamental rights that are not justiciable but are laid down as Principles of Policy in Part II, Chapter 2 of the Constitution, which will guide the State in the realm of labor welfare. In accordance with Article 37, the State shall provide for affording children and women equal opportunities and conditions of work, and for their protection by ensuring that they are not employed in work inappropriate to their age or sex, and for maternity benefits for women in work (International Labor, 2022a). Article 38 obligates the state to take care of the people by improving their living standard, preventing concentration of wealth in a few hands, and making provisions for their basic needs and the social security of every citizen of the state who is unable to earn his living because of his infirmity or unemployment. The principles spell out a constitutional vision of social

justice that runs broadly parallel to the ILO's decent-work paradigm, but which are not justiciable, and therefore, represent more an interpretive orientation and a vision of what legislation should strive to achieve than they do actual rights enforceable by courts (International Labor, 2024b). Collectively, these clauses create the labor rights in Pakistan as a part of a wider human rights and social-justice agenda with textual support provided by the Objectives Resolution's focus on social, economic, and political justice.

Institutional and Legal Structure of Labor Regulation in Pakistan

The Eighteenth Constitutional Amendment 2010 has changed the institutional setting of labor law in Pakistan and removed the Concurrent Legislative List from the Constitution; consequently, the general jurisdiction of the Federal Parliament over labor- and industrial-relations-related legislation has also been eliminated. Before this change, labor was a concurrent issue; both the federal parliament and assemblies had legislative powers over it, and where there was a clash, federal legislation would apply (International Labor, 2023a). After devolution, competence has been vested only in the four provincial assemblies, and the federal legislative powers are limited to the Islamabad Capital Territory; hence, for trans-provincial structures functioning in two or more provinces, there is a legally contested and still unsettled jurisdiction.

Each province in the first few years after devolution adopted its own industrial-relations legislation, mostly based on the repealed federal Industrial Relations Ordinance of 1969 with changes to the titles and details, and which was later replaced in 2008 and 2010.

This provincial legislative function is provided by, and sometimes in conjunction with, a set of institutions whose competence has been impacted by devolution. The labor departments are now the responsibility of the provinces to formulate, inspect, and enforce policies in their areas, and labor courts and industrial-relations tribunals have been recreated at the provincial level to adjudicate collective and individual disputes. Some federal institutions, especially the Employees' Old-Age Benefits Institution, have continued to function on a national basis, despite devolution; the idea of

devolution for federal welfare institutions themselves has failed to gain traction, as has the question of how to divide federal welfare laws, like the Companies Profits (Workers' Participation) Act of 1968, among provinces; and the issue of how to deal with federal tax laws, like income tax, has yet to be resolved more than 10 years after the Eighteenth Amendment (Wood et al., 2022). Institutional structure leads to fragmentation with some real implications. This institutional fragmentation is an important background to the substantive comparative analysis that follows, not only because it helps determine the nature of Pakistani labor law, but perhaps even more significantly, because it also determines the state's capacity to enforce the law (Cherry & Aloisi, 2022).

COMPARATIVE ANALYSIS OF INTERNATIONAL LABOR STANDARDS AND PAKISTANI LABOR LAWS

Freedom of Association, Trade Unions and Collective Bargaining

ILO Conventions No. 87 and No. 98 mandate the right for workers and employers to form and join worker and employer organizations of their own choice, without prior permission, to have no reason to fear administrative dissolution, and to have in place processes to allow for genuine collective bargaining, free from anti-union discrimination and employer interference. Pakistan has accepted both conventions and has enshrined this right in its constitution, in Article 17, which guarantees the right to establish associations and unions (De Stefano et al., 2022). Provincial Industrial Relations Acts, designed based on the previous federal Industrial Relations Ordinance, include processes for trade union registration, criteria for determining if a union is a collective bargaining agent, and set up labor negotiation and conflict resolution procedures through conciliation, arbitration, and labor courts.

Coverage of collective bargaining in Pakistan is limited and restricted to a small number of formal sector, large-scale operations, especially in the state-owned sector and in larger-sized private manufacturing units, while spread is very small in informal sectors where the majority of the population works (Smit et al., 2023). While the basic structure of all the Provincial Industrial

Relations Acts are similar to international standards, the need for a union to achieve a minimum level of employee support to become a collective bargaining agent, plus the fact that most Pakistani workers are informally employed and geographically dispersed, means that the legal system to facilitate collective bargaining, in its formal structure is similar to international standards but in practice translates into only a small amount of real power for the majority of workers in Pakistan. The pattern that emerges from this comparison with the international standards is there, however, in that the formal structure is quite similar to the requirements of Conventions No. 87 and No. 98, but a variety of definitional omissions, narrow enforcement and implementation criteria, and the sheer volume of informal work bring about an implementation and enforcement gap that is much larger than the gap in the text itself (McCann, 2022).

Forced Labor, Child Labor and Protection from Exploitation

Compulsory Employment: The International Labor Organization Treaties Number 29 and Number 105 (endorsed by Pakistan and submitted to the ILO during 2025 through the 2014 Addendum) prohibit compulsory employment. The instruments go beyond simply prohibiting forced labor in legislation and require governments to take practical steps to prevent such practices, protect those affected, ensure access to justice, and provide for redress (Rubery & Rafferty, 2023). However, bonded and forced labor is still prevalent in certain industries like agriculture, especially in parts of Sindh and Punjab, and in the brick-kiln industry. Even though they may be illegal, advance payment arrangements can be a form of bondage that perpetuates cycles of debt. The continuance of these practices is thus indicative not so much of a lack of formal laws against them as of problems in law enforcement, identification of victims, and the social and economic mechanisms that perpetuate debt bondage (Aloisi & De Stefano, 2022).

The issue of child labor is no different in that regard. The minimum-age provisions of ILO Conventions Nos. 138 and 182 are based on the compulsory schooling age, while the prohibition of WFCL covers hazardous work. Under provincial

devolved laws and the Employment of Children Act 1991, Article 11 of Pakistan's Constitution bans the use of children under the age of 14 for factory, mining, or hazardous work. But there is a significant gap between implementation in recent evidence. More than 1 in 10 children (1.6 million children) out of the population aged 5-17 were involved in child labor, revealed by the Sindh Child Labor Survey 2022-2024, in collaboration with UNICEF and the Bureau of Statistics (Hepple, 2022). Over half of working children between the ages of ten and seventeen were said to be engaged in hazardous situations, such as working long hours, using dangerous tools, working in hot conditions and extremes of temperature, and working in agriculture. The strong linkage between child labor and educational exclusion is reflected in the school attendance of working children (around 40 percent) versus non-working children (more than 70 percent).

Forced labor and child labor are predominantly present in the informal sector. Historically, labor inspection in Pakistan has focused on the Factories Act; hence, its coverage is weak in sectors such as agriculture, household enterprises, domestic work, and home-based work. The key comparative deficiency, therefore, is often in enforcement and coverage, not in the absence of legislation. (Amber & Chichaibelu, 2023).

Wages, Working Conditions, Occupational Safety and Social Protection

Textbook definitions of minimum wages are not required by international standards to establish a single wage rate; rather, they specify the need for a minimum-wage system that is properly established through consultation with workers' and employers' organizations, applied without discrimination, and adjusted periodically in response to workers' needs and economic conditions. Since devolution, provincial Minimum Wage Boards have been established under provincial laws that are largely modeled on the previous federal Minimum Wages Ordinance 1961 (Shah et al., 2022). For the fiscal year 2024-2025, statutory minimum wages were around PKR 37,000/month in ICT, Punjab, and Sindh; PKR 36,000/month in KP; and PKR 35,000/month in Baluchistan. However, policy research shows that living wages are considerably

higher and that there is significant non-compliance, especially in industries such as industrial establishments in Sindh. This leaves the real issue as the effective enforcement of the statutory minimum wage. The provisions on working hours and rest periods in the provincial adaptations of the Factories Act generally align with the ILO's basic provisions on daily and weekly working limits and weekly rest. However, their application is limited to formal settings and is relatively weak in agriculture, the domestic sector, and informal manufacturing (Alam, 2023).

Social security is also divided between the federal level (Employees' Old-Age Benefits Institution) and the provincial level (Employees' Social Security Institutions), which offer social security benefits related to pensions, healthcare, and injuries. Coverage is still very limited, and only registered establishments and their employees. The latest Labor Force Survey figures indicate that the informal sector accounts for some seventy percent of employment under less stringent definitions, and up to eighty percent if agriculture is included. As a result, most workers in Pakistan are not part of the contributory social-security program. Formal entitlements to protection for mothers are largely consistent with international principles, and are provided by the Maternity Protection Ordinance 1958 and various provincial regulations, but are largely available only to those who are formally employed (Batool, 2023).

Protection in the provinces has, however, not yet been extended to workers who have been historically deprived of it. In 2018, Sindh passed Home-Based Workers legislation and in 2019 passed Women Agricultural Workers legislation, with similar laws passed in Khyber Pakhtunkhwa in 2021 and Balochistan in 2022. These steps are significant steps towards international standards, such as ILO Conventions No. 177 and No. 189, which Pakistan has not yet ratified. In general, the trend is of partial legislative convergence in a genuine sense, and significant problems in implementing it at the level of practical action, as well as in social protection (Thebo et al., 2024).

MAJOR CHALLENGES, GAPS AND FUTURE DEVELOPMENT OF LABOR LAW IN PAKISTAN

The comparative analysis shows that Pakistan's key difference from international labor standards is that the disparity lies not in legislation but in implementation. Pakistan has accepted the ILO's fundamental conventions, provisions in the constitution have been increasing to safeguard the core labor standards, and provincial legislation has been expanding to include occupational safety, workplace harassment, home-based work, domestic work, and other areas that are affected by international standards (Rashid, Faridi, et al., 2024). Enforcement, institutional capacity and reach of labor institutions in the informal economy are the key weaknesses in the central core. It is thus one of the most critical structural weaknesses and areas that must be addressed. In the past, inspection procedures lacked adequate resources and human resources, and in some instances, there were corrupt or informal relationships between inspectors and employers. Devolution has added complications, as the provinces are required to build their own inspection capacities while facing uncertainty about their jurisdictions, especially for establishments that cross provincial lines (Rashid, Mehmood, et al., 2024). The high rate of informal employment (between 70 and 87 percent, depending on the definition) reduces the impact of a system that relies on registered workplaces, formal contributions, and establishment-based collective bargaining.

The informal sector continues to dominate child and bonded labor and is linked closely with poverty, low levels of parental education and dropouts from school. Coordinated education and social protection measures, in addition to labor law enforcement, are thus essential for effective responses. Gender inequalities also permeate informal regulation of labor. Women's low participation in the workforce in Pakistan is due to it being very difficult for them to move, social norms, childcare issues, and the safety of the transport system and workplaces. The lack of collective bargaining and trade-union representation also weakens workers' bargaining power to demand stronger enforcement. Members of large informal-sector groups are difficult to

organize, and rules affecting union representation can make unions less effective (Kishwar et al., 2023). While there is some improvement in occupational safety in Sindh, the situation remains inconsistent, and frequent accidents at industrial sites show that legislation alone can't ensure workplace safety.

One of the issues with minimum wages is not so much the level of the minimum wage as its enforcement. Non-compliance remains an issue in certain industries, and inflation can diminish the purchasing power of nominal wage growth. Devolution has led to more decentralized regulation, with different provincial laws dealing with similar issues, and a differential pace of progress in extending protection to domestic, home-based, and agricultural workers. Lack of understanding of the legal rights of workers and the obligations of employers also undermines implementation, especially in rural and informal economies (Rahat et al., 2023). Institutional and procedural limitations also exist in the labor courts and tribunals, such as case backlogs and delays, and formal means of redress being difficult for workers who cannot afford to litigate. Lack of access to labor justice is a serious concern, and welfare funds and dispute-resolution options are in place for some vulnerable groups affected by the current laws.

Domestic, agricultural and home-based workers have been covered by protection since 2018, although coverage is not uniform across provinces. However, Pakistan's failure to ratify ILO Conventions No. 177 and No. 189 creates gaps when compared to the most comprehensive international framework. New types of jobs introduce more difficulties (Maqsood et al., 2024). The traditional labor law framework in Pakistan does not adequately cover digital platforms, gig work, automation, and AI. The research indicates that there are some areas in which platform companies in Pakistan are vulnerable, such as minimum-wage-equivalent compensation, contract transparency, and workers' challenges to platform decisions. Proposed reforms have not yet resulted in a comprehensive legislative response. The harmonization, therefore, must take place at two levels. First, there is a need for targeted legislative reforms in areas where there is still a real, clear gap, such as the possible ratification of Conventions No.

177 and No. 189 and the more widespread enactment of comprehensive occupational safety legislation. Second, more crucially, institutional reform in Pakistan must be sustained and include labor inspection, judicial capacity, and social security administration (Malhi, 2024). If these are not strengthened, further legislation will not have a significant impact on workers' practical rights.

COMPARATIVE ASSESSMENT AND PROSPECTS FOR HARMONIZATION OF PAKISTAN'S LABOR LAWS WITH INTERNATIONAL STANDARDS

It is important to differentiate between formal legal obligations and workers' experiences when evaluating Pakistan's position. The overall trend of Pakistan's constitutional and legislative frameworks toward international labor standards is quite favorable in many significant aspects. The ILO is relevant in its role as a technical assistance provider, a supervisor, and a supporter of the Decent Work Country Program. International trade also provides an incentive for more reform, such as the European Union's GSP Plus framework. Pakistan's ratification of the Forced Labor Protocol, Maritime Labor Convention and Labor Statistics Convention in 2025 reflects ongoing commitment to international conventions. Internationally, however, pressure is more effective at getting legislators to make commitments than at developing the long-term domestic institutional capacity to do so. The greatest need for reform is, therefore, effective labor inspection. Pakistan requires more well-trained and well-staffed inspectors, a broader scope of inspections beyond registered factories to include agriculture and informal manufacturing, and stronger protections against political and economic interference (Saleem, Mahmood, et al., 2024).

Procedural changes that improve access to labor justice by lowering costs, delays, and broadening access to effective dispute resolution to more vulnerable groups of workers. Protection for informal workers, who make up much of Pakistan's workforce, could be achieved through other means less reliant on formal workplace registration. Alternatives to the traditional establishment-based model are possible, including portable social security mechanisms, sectoral bargaining

arrangements, and technology-based registration and payment systems (Graz et al., 2022). The government of Pakistan should also take steps to modernize labor law to meet the requirements of the platform and gig economies. Future legislation may include minimum wages, contract transparency, algorithmic decision-making, and workers' representation and remedies. Proactively creating such protections will enable Pakistan to adapt to technological change without following the same pattern of reacting to it that has been adopted in other countries.

The labor law system in Pakistan is better aligned with international labor standards in terms of formal law design than its implementation. The evidence shows that the main problem is not just a shortfall of legislation; it is the ongoing failure of institutions to reach out to the majority of the informal sector and vulnerable workers (Paul, 2024). Sustained investments in protecting the informal sector, workers' representation, social security, judicial capacity, and labor inspection are more important than targeted legislative reform, which is still needed, particularly regarding non-ratified international standards and differential protection across the provinces (Shahid & Syed, 2023). It is only with this joint effort that the significant disparity between the rights guaranteed under Pakistani legislation and those actually enjoyed by the workers can be significantly narrowed.

CONCLUSION

The comparative analysis shows that Pakistan has a robust formal labor law framework that broadly mirrors key international labor standards. There are signs of meaningful law changes, including constitutional protection, ratification of fundamental ILO conventions, and provincial laws on occupational safety, workplace harassment, domestic workers, home-based workers, and agricultural workers. However, it highlights that the legal protection framework is not always effectively translated into practice. Large pockets of the working population remain subject to forced labor, gender differences, poor working conditions, insufficient minimum-wage protection, weak workers' social-security coverage, and little collective bargaining. The high prevalence of informality also

limits the scope of labor inspection and conventional social protection measures. The Eighteenth Constitutional Amendment has enhanced the legislative power of provinces but has also led to institutional capacity gaps in the regulatory system. Pakistan must shift from a legislative to an effective enforcement approach to existing rights. There is a need for targeted changes, such as better protection for workers. But increasing investment in labor inspection, expanding access to labor justice, social security, and worker representation, and strengthening federal-provincial coordination is also crucial. Accessibility, enforceability, and effectiveness of legally recognized workers' rights in the formal and informal sectors are ultimately key to meaningful harmonization with international labor standards.

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