



May 11, 2026

Ms. Maryam Nawaz Sharif
Chief Minister Punjab
CM House, Lahore

Subject: Transparency International Pakistan Recommendations for Punjab Climate Change Act 2026 aimed at Strengthening Inclusion and Integrity in Climate Response

Dear Madam,

Transparency International Pakistan has learnt about the Government of Punjab's efforts to draft Punjab Climate Change Act 2026. The Act will provide a robust legal framework to plan, oversee and implement climate actions aimed at addressing climate risks faced by the province of Punjab.

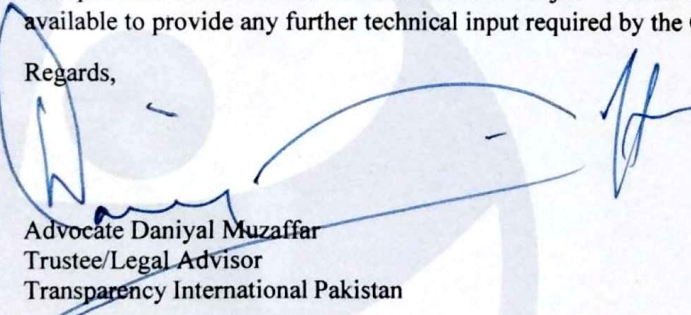
Since 2023, TI Pakistan as part of a global Climate Governance Integrity Program, implemented by Transparency International, has been working across Pakistan both at federal and provincial levels to ensure climate planning and policies are inclusive of the voices of different stakeholders, including citizens as well advocating for the adoption of integrity measures in climate frameworks. As part of this work, the organization has engaged with number of civil society organizations, stakeholders and communities in climate vulnerable districts across Punjab. Based on the outcomes generated out of these interactions, TI Pakistan is pleased to submit key recommendations for consideration under the drafting process of Punjab Climate Change Act 2026.

The recommendations focus on key pillars of climate governance integrity, including transparency and proactive disclosure of climate data, climate finance accountability, safeguards for natural resources and carbon markets, procurement transparency, grievance redress mechanisms, environmental enforcement, climate justice, youth and civil society participation.

The proposals are intended to complement the provincial government's ongoing efforts to ensure that the Punjab Climate Change Act 2026 establishes a robust, transparent, and participatory climate governance framework aligned with national priorities and international best practices.

TI Pakistan requests the Chief Minister Punjab to issue directives to relevant departments for the incorporation of draft recommendations into Punjab Climate Change Act 2026. TI Pakistan remains available to provide any further technical input required by the Government of Punjab.

Regards,


Advocate Daniyal Muzaffar
Trustee/Legal Advisor
Transparency International Pakistan

Copies forwarded for the information with request to action under their mandate:

1. Advisor to Prime Minister, PM House, Islamabad
2. Federal Minister, Ministry of Climate Change & Environmental Coordination, Islamabad
3. Minister, Environment Protection and Climate Change Department, Govt of Punjab, Lahore
4. Chief Secretary, Government of Punjab, Lahore
5. Federal Secretary, Ministry of Climate Change & Environmental Coordination, Islamabad
6. Secretary, Environment Protection and Climate Change Department, Govt. of Punjab, Lahore.
7. Director General, Punjab Environmental Protection Agency, Lahore.
8. Director General, Punjab Disaster Management Authority, Lahore
9. Chairman, Pakistan Climate Change Authority, Islamabad
10. Registrar, Lahore High Court, Lahore.

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Transparency International Pakistan Recommendations for Punjab Climate Change Act 2026

Enhancing Integrity and Inclusion in the Provincial Climate Governance Framework

Recommendation No. 1: Recognize Transparency and Accountability as Foundational Principles

The Punjab Climate Change Act 2026 must explicitly recognize transparency, accountability, public participation, climate justice, and integrity as foundational principles of climate governance in the province. This commitment shall be recognized within the overall objective of the framing of the Act to ensure that the participation and transparency are recognized as a guiding principle of climate governance.

Recommendation No. 2: Embed Inclusion of Experts, Academia and Civil Society in the Governance Structures

The Punjab Climate Change Act 2026 must ensure inclusion of experts, civil society, academia and industry in the composition of the Authority or Board governing the implementation of the Act and overseeing climate strategies across the province.

Recommendation No. 3: Establish Climate Data Transparency, Monitoring, Reporting, and Verification (MRV) Framework

The Punjab Climate change Act 2026 should establish a Climate Data Transparency and Monitoring, Reporting, and Verification (MRV) Framework to strengthen transparency, accountability, integrity, and accuracy in climate data reporting across the province. The framework must require standardized systems for collection, verification, disclosure, and periodic updating of climate related information, including greenhouse gas emissions data, climate finance utilization, carbon market activities, environmental compliance information, and climate related project performance indicators.

All relevant departments, implementing entities, industries, and climate related projects should maintain climate related records disclosed through Provincial Climate Finance Dashboard in accordance with approved methodologies and applicable international standards.

Special safeguards should also be introduced to strengthen transparency in provincial emissions accounting, climate finance reporting, and carbon market transactions, including measures to prevent double counting and greenwashing.

Recommendation No. 4: Institutionalize Public Participation

The Act must recognize that public participation processes shall be inclusive, accessible, and responsive to the needs of affected communities, including women, low-income groups,

indigenous peoples, communities, and other vulnerable or marginalised persons. This requires including mandatory provision for the following:

- a. Affected communities shall be provided opportunities to participate in key stages of environmental decision-making, including project scoping, assessment, approval, and monitoring.
- b. The Environment Protection and Climate Change Department (EPCCD), Environment Protection Agency (EPA), Provincial Disaster Management Authority (PDMA) and all relevant departments and authorities shall consider community inputs in determining environmental conditions and mitigation measures.
- c. Projects subject to environmental approval under the Punjab Environmental Protection Act shall include equitable benefit-sharing measures for affected communities, proportionate to the nature and scale of environmental and social impacts. Such measures may include livelihood support, local employment, community development initiatives, ecosystem restoration, or other locally relevant benefits.
- d. The Environment Protection and Climate Change Department (EPCCD) or the Environment Protection Agency (EPA) shall prescribe standards, procedures, and templates for public consultation, disclosure, grievance redress, and benefit-sharing plans to ensure consistency, transparency, and accountability.
- e. Information relating to public consultations, benefit-sharing commitments, and compliance status must be publicly disclosed and be subject to monitoring and enforcement under the Act.

Recommendation No. 5: Strengthen Grievance Redress Mechanisms

The Punjab Climate Change Act 2026 must establish an independent Climate Grievance Redress Mechanism to ensure accessible, timely, transparent and effective resolution of complaints related to climate governance, finance or environmental harm. The mechanism must include:

- a. clearly defined timelines for complaint resolution
- b. safeguards against retaliation
- c. confidential and accessible complaint submission procedures
- d. appeal and review mechanisms
- e. periodic public reporting on complaints received, actions taken and resolution status
- f. special provisions to ensure accessibility for women, marginalized groups, climate-affected communities, and persons with disabilities

Recommendation No. 6: Ensure Mandatory Compliance with Public Procurement Laws

The Punjab Climate Change Act 2026 must ensure strict compliance with Punjab Public Procurement Regulatory Authority (PPRA) Rules 2014 across all climate-related projects, including emergency procurement, carbon market initiatives, and disaster response interventions. All procurement related information must be made publicly available. Large-scale climate related procurement must incorporate integrity and anti-corruption safeguards, such as Integrity Pacts.

Recommendation No. 7: Environmental Crimes and Enforcement Mechanism

The Punjab Climate Change Act 2026 should define and criminalize environmental offences including deliberate pollution, illegal emissions, misuse of climate funds, fraudulent carbon market activities, falsification of emissions reductions, encroachment on natural ecosystems, manipulation of environmental data, and other forms of environmental harm.

The environmental should also include the unsustainable use and depletion of natural resources such as groundwater extraction beyond permissible limits, illegal deforestation and tree cutting, and violations related to urban land use and housing development that adversely affect environmental sustainability. Dedicated enforcement and prosecution mechanisms should be established to ensure effective implementation and deterrence.

Recommendation No. 8: Establish Legislative Oversight and Annual Reporting

The Punjab Climate Change Act 2026 should establish legislative oversight framework requiring the provincial government to submit an Annual State of Climate Change and Governance Report to the Punjab Assembly and relevant Standing Committees. The report must detail progress against climate targets, implementation of adaptation and mitigation measures, climate finance utilization, environmental compliance, district-level performance, emission trends, status of grievances and remedial actions and audit findings. The report should be made publicly accessible through official digital platforms to ensure transparency and public access to climate-related information.

Recommendation No. 9: Carbon Markets and Integrity Safeguards

The Punjab Climate Change Act 2026 must introduce transparency and integrity safeguards for carbon market activities in the province. This includes ensuring public disclosure of carbon agreements, project ownership structures, implementing entities, validation and verification arrangements, carbon credit issuance and retirement information, revenue sharing arrangements, community benefit-sharing mechanisms, and safeguards against double counting and greenwashing. It must also ensure free, prior, and informed consent of affected communities in all carbon-related projects.