

Pakistan's NDCs 3.0: A Hackneyed Narrative



Researcher-Writer

Ammara Aslam

Reviewers

Shaheera Tahir, Muhammad Badar Alam

Designer

Hamza Khalid

Copyright

Excerpts of this briefing paper can be freely reproduced with due acknowledgement. For readers wishing to cite this document, we suggest the following: Critical Analysis – “Pakistan’s NDCs 3.0: A hackneyed narrative” by Policy Research Institute for Equitable Development (PRIED), © November 2025

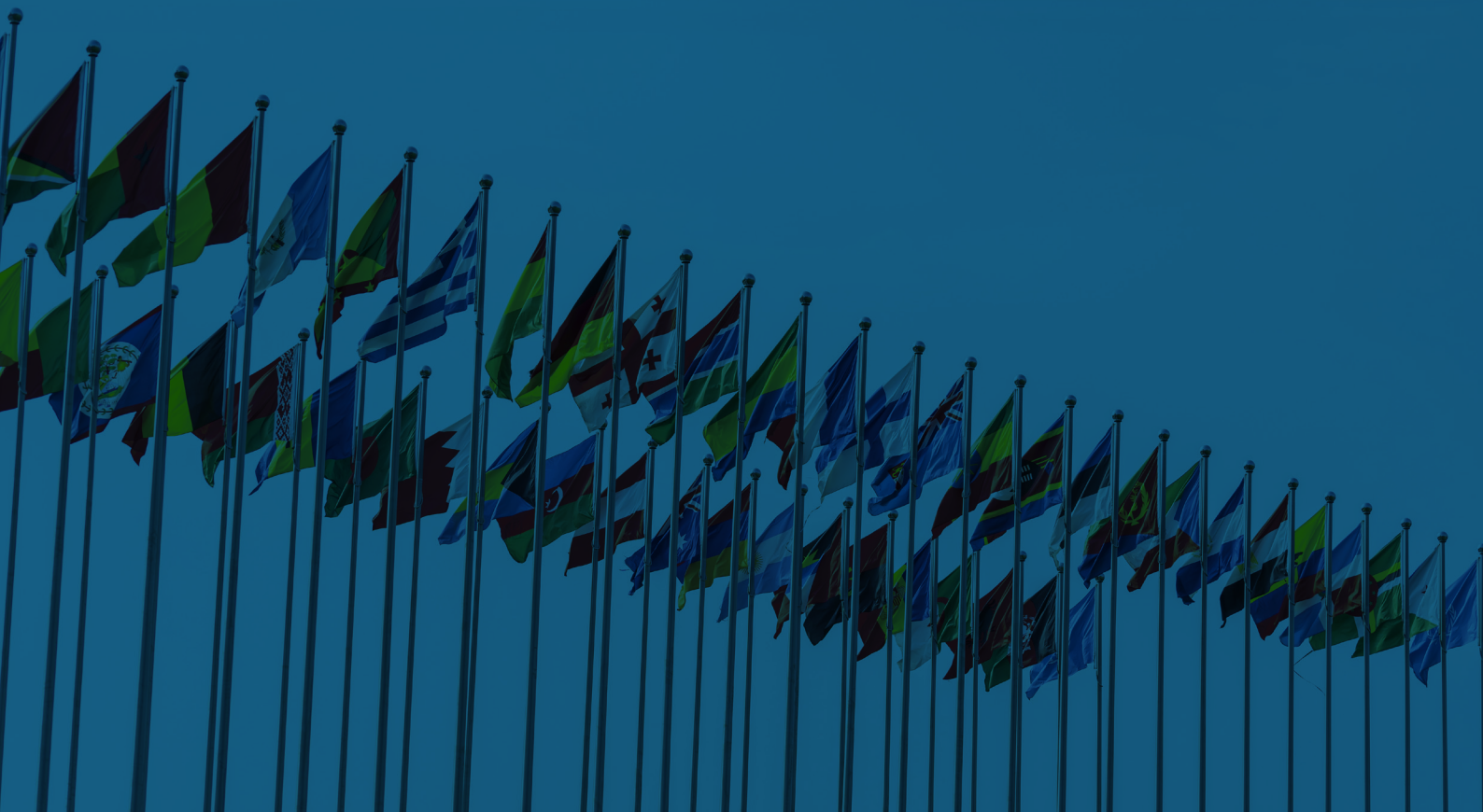


Table of Contents

Background.....	1
Global Expectations from NDCs 3.0.....	2
Pakistan’s Previous NDCs.....	3
Overview of NDCs 3.0.....	5
Comparison of the successive NDC documents of Pakistan.....	6
Critical Analysis of NDCs 3.0.....	9
Recommendations.....	16

List of Tables

Table 1: Comparison of Pakistan’s NDCs.....	6
---	---

List of Figures

Figure 1: Pakistan’s NDC 2.0 Commitments.....	4
Figure 2: Pakistan’s NDC 3.0 commitments and initiatives.....	5
Figure 3: Pakistan’s reported and projected GHG emissions in NDCs 3.0 (2015- 2035).....	11
Figure 4: GHG Emissions by Sector for Pakistan – A yearly trend.....	11
Figure 5: Policy Recommendations.....	16

Background

Before the secretariat of the United Nations Framework Convention on Climate Change (UNFCCC) organized the 21st Conference of the Parties (COP21) in Paris in November–December 2015, it invited its member countries to do something unprecedented: announce what they could contribute to reduce the emission of greenhouse gases (GHGs) that cause global warming, in order to keep the average rise in global temperature below 1.5 degrees Celsius. Many countries, including Pakistan, responded positively, announcing what came to be called Intended Nationally Determined Contributions (INDCs). These INDCs then shaped the negotiations at COP21 that ended with the signing of the Paris Agreement¹. The signatories to the agreement pledged, among other things, to submit their Nationally Determined Contributions (NDCs) every five years.

The agreement's signatory countries are also expected to scale up their ambition to reduce their GHG emissions in each of their NDC submissions under a ratchet mechanism. This expectation has been stated in Article 4.1, which mentions the concept of net zero – a state where the amount of GHGs being emitted in the atmosphere becomes equal to the amount of GHGs being removed from the atmosphere. Net zero can never be achieved unless every country continues to make incremental changes in its target to reduce its GHG emissions.

Article 2 of the Paris Agreement, however, acknowledges the different national circumstances and the insufficiency of financial resources within the developing countries to reduce their GHG emissions. It, therefore, talks about common but differentiated responsibilities – that it is the common responsibility of all the countries to work towards net zero based on their respective capabilities. To ensure equity, it underlines the role of developed nations in mobilizing climate finance for adaptation and mitigation measures in developing countries in its Article 9, owing to their high levels of historic and current GHG emissions.

To maintain a record of how each country's NDCs are progressing, the UNFCCC secretariat has set up the NDC Registry². The Paris Agreement signatories are required not only to submit their five-yearly NDCs to this registry, but they must also submit several ancillary documents alongside. Under the agreement's Enhanced Transparency Framework, for instance, the signatories are required to submit their Biennial Transparency Reports (BTRs) every two years starting from December 2024. These reports include national-level GHG inventories and also track progress on NDC goals and commitments³. In addition, the National Inventory Reports (NIRs) are also to be prepared and submitted in accordance with IPCC guidelines and methodologies to report annual time series data of emissions.

The first edition of NDCs was due in 2020, but many countries, including Pakistan, submitted them only in 2021. Their second iteration is being submitted now – in 2025. In this iteration, each country is expected to present a GHG reduction plan for the next decade – that is, till the end of 2035.

1. unfccc.int/sites/default/files/english_paris_agreement.pdf
2. <https://unfccc.int/NDCREG>
3. Biennial Transparency Reports | UNFCCC



1.5°

Global Expectations from NDCs 3.0

The Sixth Assessment Report (AR6) released in 2023 by the Intergovernmental Panel on Climate Change (IPCC)⁴ stated that a 43 percent reduction in GHG emissions by 2030 and a 60 percent reduction in them by 2035 was required to achieve the goals of the Paris Agreement. The report also said that, globally, we have to reach net zero by 2050 to avoid devastating and irreversible impacts of climate change⁵. Experts and climate activists warn that this will be an uphill task. They say that a vast gap exists between the required mitigation measures (which reduce GHG emissions) and adaptation initiatives (that build resilience in the face of climate change) and the climate-related policies, plans and projects being pursued by each party to the Paris Agreement.

This lag in implementation – and the consequent global failure to achieve the Paris Agreement goal of keeping the average rise in global temperature to 1.5 degrees Celsius compared to pre-industrial levels – is strongly reflected in the 2025 emissions gap report recently released by the United Nations Environment Programme (UNEP)⁶. This report states that global emissions reached 53.2 gigaton carbon dioxide equivalent (GtCO₂e) in 2024, increasing 1.3 percent from their 2023 levels. (It is important to note here that these emissions do not include the ones from Land Use, Land Use Change and Forestry.) The UNEP also reports that the world needs to emit 55 percent less GHGs annually compared to the 2019 emissions levels if it is to align with the 1.5-degree Celsius Pathway. On the other hand, even with the full implementation of the latest NDCs being submitted by all the parties, the global average surface temperatures of the earth are on track to rise by 2.3–2.5 degrees Celsius by the end of the century.

Developing countries, however, argue that their NDCs, no matter how ambitious they may be, cannot be realized unless they are backed by the implementation of the New Collective Quantified Goal (NCQG) for climate finance – as well as by capacity and technology transfers from the Global North to the Global South. They complain that the financing promised under NCQG at COP29 held in Baku, Azerbaijan – 300 billion US dollars – is hardly enough, as they wanted the developed countries to commit several trillions of dollars if the NDCs were to be actually achieved. Their complaint later led to the creation of the 'Baku to Belem Roadmap'⁷, which expects the Paris Agreement signatories to put together a mechanism to mobilize 1.3 trillion US dollars annually by 2035 under climate finance through public and private sources before they meet at COP30 in Belem, Brazil.

The critics of the roadmap, however, point out several ambiguities in it. Firstly, it puts the burden of mobilizing 40 billion US dollars on the Global South countries, which are already facing the brunt of climate-related disasters while struggling with weak economies and high indebtedness. Secondly, it mandates that the developed countries provide only 80 billion US dollars in bilateral financing, absolving them of responsibility for their historic GHG emissions and putting the major burden to mobilize climate finance on the private sector. Thirdly, the schemes or windows to access climate finance have not been clearly delineated in it, especially for vulnerable and indigenous communities.

All in all, the roadmap acts as a standalone document, disconnected from the rest of the UNFCCC's mandate. It also does not contextualize – as well as cater to – the climate finance needs of developing and emerging economies.

4. The IPCC is a United Nations body comprising 195 parties or governments part of WMO or UNEP, with thousands of experts and scientists globally, that assesses climate change related science to inform policies and negotiations at the international climate forums.

5. https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_FullVolume.pdf

6. Emissions Gap Report 2025 | UNEP - UN Environment Programme

7. [Relatorio_Roadmap_COP29_COP30_EN_final.pdf](#)

Pakistan's Previous NDCs

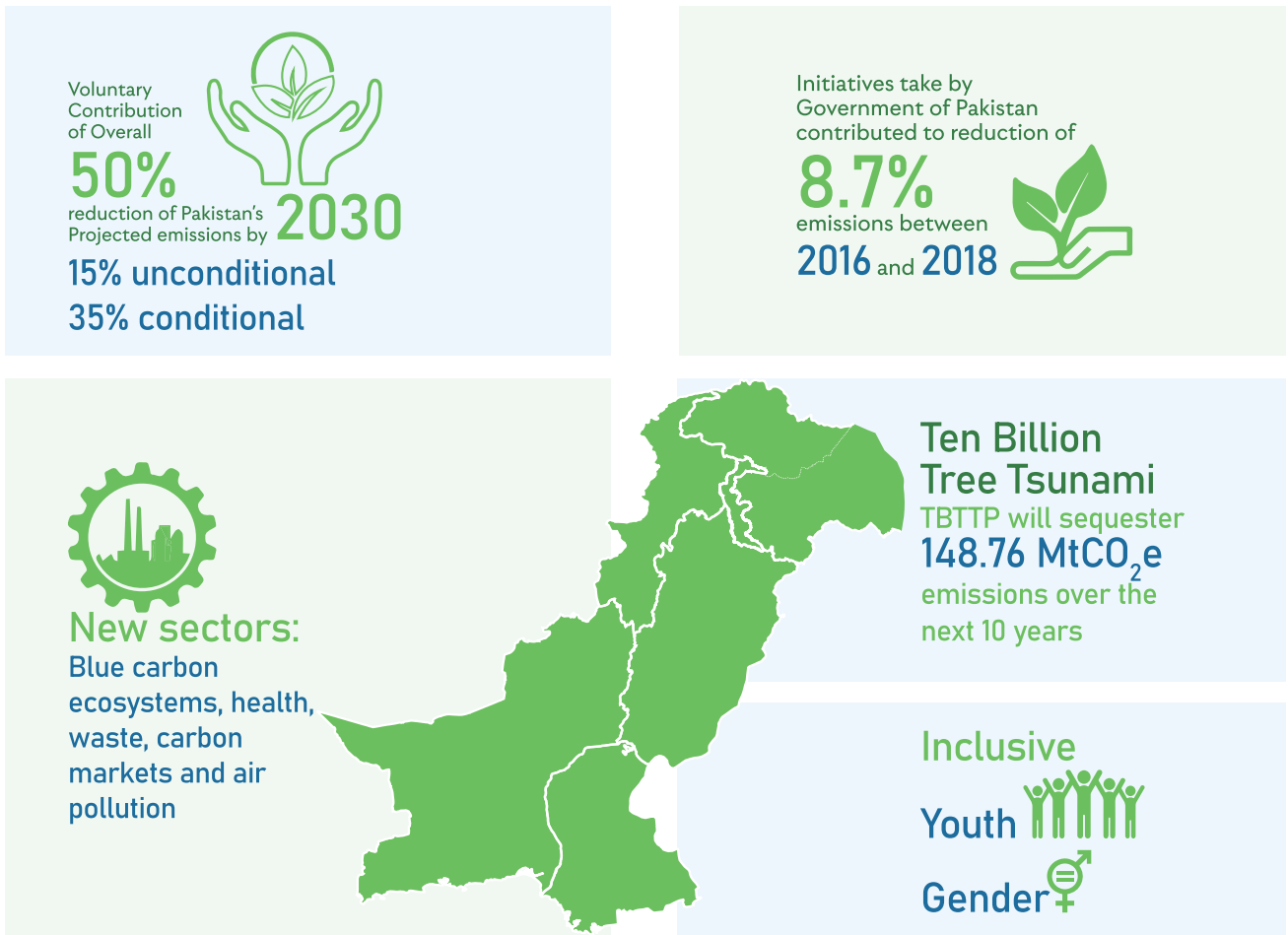
In its INDCs, submitted in 2016, Pakistan promised that it would make a 20 percent reduction in its GHG emissions by 2030 – bringing them down from a projected 1603 metric tons of carbon dioxide equivalent (MTCO₂e) to 1282 MTCO₂e. The attainment of this target, however, was contingent upon the availability of international financial assistance, with a total price tag of approximately 40 billion US dollars. Pakistan also stated that it additionally needed 7–14 billion US dollars every year for adaptation measures necessary to address climate vulnerabilities effectively⁸.

Pakistan's 2021 NDCs (NDCs 2.0) were more ambitious than its INDCs, setting an overall target of 50 percent reduction in GHG emissions by 2030. Of this, 15 percent reduction was to be unconditional – that is, it was to be achieved with domestic efforts – whereas 35 percent reduction was conditional upon receiving external financing. Under NDCs 2.0, the government identified 59 priority actions at the national and provincial levels under mitigation, adaptation and other overarching themes, requiring 2.367 billion US dollars. The scope of the NDCs was also expanded to include many GHG-intensive sectors such as agriculture, forestry, land use, waste, energy, transport and industry.

These ambitious targets notwithstanding, NDCs 2.0 did not quantify and consolidate the financing requirements, both for conditional and unconditional actions, until the government released an investment plan in 2024⁹ – just a year before the next iteration of NDCs was due. This delayed release of the investment plan clearly meant that the implementation of all the priority actions identified in NDCs 2.0 was also delayed

8. <https://unfccc.int/documents/497814>

9. NDC Investment Plan Pakistan | United Nations Development Programme



High priority actions identified in Pakistan's NDCs 2.0

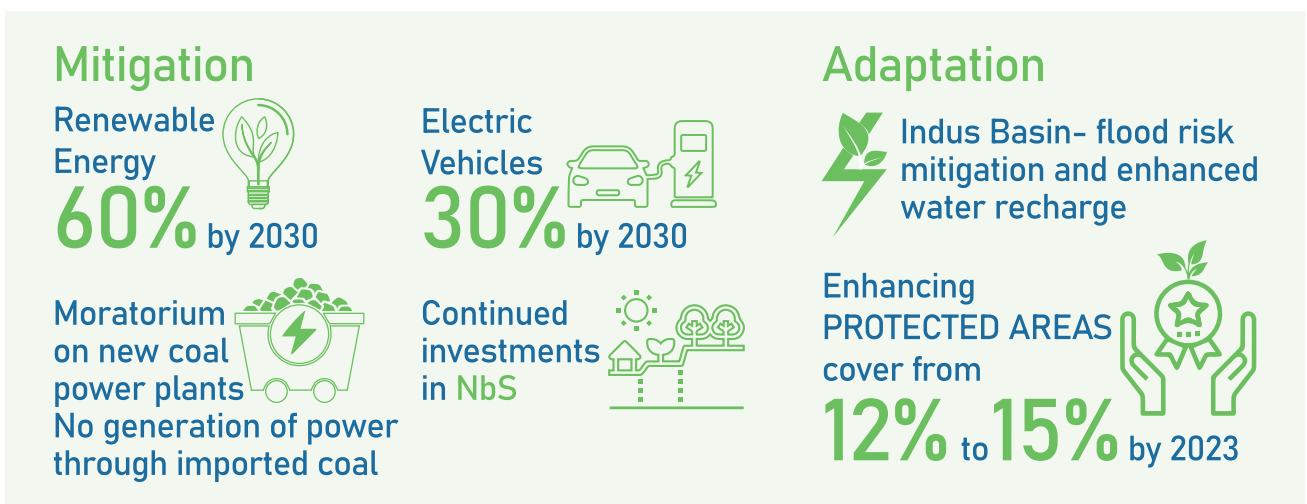


Figure 1: Pakistan's NDC 2.0 Commitments

Overview of NDCs 3.0

Pakistan's NDCs 3.0¹⁰ reiterate the target of 50 percent voluntary reduction in GHG emissions, but its deadline has been extended from 2030 to 2035. The other important change pertains to the shares of conditional and unconditional emission reductions – with the latter set at 17 percent and the former at 33 percent. To meet these emission reduction targets, NDCs 3.0 state that Pakistan will need at least 565.7 billion US dollars. In its Country Climate and Development Report 2022 for Pakistan, the World Bank also estimated that Pakistan required 348 billion US dollars by 2023 to realize its low-carbon and climate-resilient development.

Pakistan's NDCs 3.0 also list some key structural reforms required for their realization. These reforms include the setting up of the Pakistan Climate Change Authority (PCCA) in 2024 to steer and coordinate climate governance. Other areas in which progress is reported to have been made include:

- Development of Climate Risk Screening Guidelines 2024 to ensure climate proofing of development projects to be carried out under any public sector planning and financing;
- Green tagging of the annual budget (that is, labelling and tracking development schemes that contribute to environmental, social and governance improvements);
- The issuing of green bonds and green sukuk (Islamic bonds);
- Imposition of the climate support levy in the national budget for 2025–26;
- Imposition of the national electric vehicle adoption subsidy to enable domestic financial flows for climate actions.

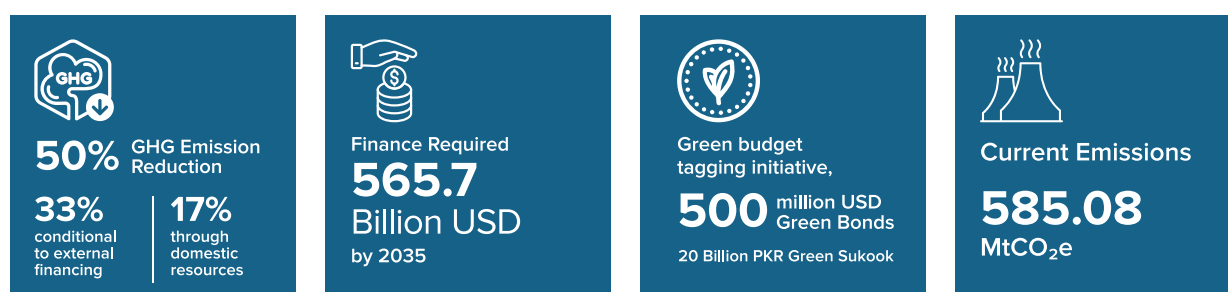


Figure 2: Pakistan's NDC 3.0 commitments and initiatives




The government also claims that the NDCs 3.0 document has been developed following a participatory, open and transparent approach. The Ministry of Climate Change and Environmental Coordination (MOCC&EC) and its subsidiary Global Climate Change Impact Studies Center (GCISC) are reported to have joined hands with the Private Power and Infrastructure Board (PPIB), affiliated with the federal energy ministry, and the Federal Flood Commission (FFC) to prepare the document. Multiple consultations are also said to have been organized with development partners such as the United Nations Development Program (UNDP), Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) and many provincial and federal actors and departments to ensure inclusivity and active participation.




10. https://unfccc.int/sites/default/files/2025-09/Pakistan_NDC3.0_24%20Sep.pdf




Comparison of the successive NDC documents of Pakistan

Below is a brief comparison of the NDC documents submitted by Pakistan:

Table 1: Comparison of Pakistan's NDCs

Parameters	NDCs 3.0 (2025)	NDCs 2.0 (2021)	INDCs 1.0 (2016)
Mitigation Targets 	<p>Maintains emission reduction target of 50 percent by 2035, with 17 percent unconditional (self-financed) reduction and 33 percent conditional on the availability of external financing, mostly grant-based or concessional international climate finance.</p>	<p>Increased emission reduction target to 50 percent by 2030, with 15 percent unconditional (self-financed) reduction and 35 percent conditional on international/external support.</p>	<p>Aimed to reduce GHG emissions by 20 percent by 2030, conditional on 40 billion US dollars in international financial support.</p>
Adaptation Priorities 	<p>Maintains and prioritizes focus, as per the National Adaptation Plan 2023, on adaptation planning in agri-food systems, industry, transport and infrastructure, forestry, biodiversity and watersheds, water resource management, health, education, and disaster risk reduction.</p>	<p>Expanded focus on water management, agriculture, forestry, and disaster risk management to address climatic vulnerabilities and disasters, aligning government initiatives with sectoral and community needs.</p>	<p>Identified annual adaptation needs of 14 billion US dollars—7 to address climatic vulnerabilities and disasters.</p>
GHG Emissions 	<p>Estimates total emissions standing at 585.08 MTCO₂e, calculated in 2024 in line with the 2006 IPCC Guidelines. Projects emissions to reach 2,559 MTCO₂e by 2035.</p>	<p>Reported that the emissions stood at 489.87 MTCO₂e – as per GHG inventory calculated in 2021. Projected emissions to cross 1600 MTCO₂e by 2030.</p>	<p>Calculated the total sectoral emissions at 405.07 MTCO₂e – reported in the GHG emissions inventory 15.–compiled in 2014</p>

<p>Sectoral Focus</p> 	<p>Expands sectoral coverage to include water management, health, education, housing, and other social sectors, in addition to the existing energy, industry, agriculture, forestry, and waste management sectors.</p>	<p>Highlighted energy, transport, agriculture, forestry, and waste management as priority sectors.</p> <p>Set detailed sectoral targets, including raising the share of renewables in the energy mix to 60 percent by 2030 and incorporating 30 percent of electric vehicles in Pakistan's national transport fleet by the same year. Committed to setting up no new coal-based power projects.</p>	<p>Highlighted energy, transport, and agriculture as priority sectors.</p>
<p>Implementation Framework</p> 	<p>Aims to take a “whole-of-nation” approach, with national and sub-national institutions integrating climate actions into their planning and operations. Appoints the Ministry of Climate Change and Environmental Coordination to serve as a focal point to monitor the implementation in collaboration with Pakistan Climate Change Council, chaired by the Prime Minister.</p>	<p>Developed a roadmap with sectoral targets, timelines, and monitoring mechanisms integrated with overall development goals.</p>	<p>Provided high-level commitments with no specific timelines or implementation mechanisms.</p>
<p>Capacity Expansion and Technology Transfer</p> 	<p>Identifies technology transfer needs in renewable energy, Electric Vehicles, industrial efficiency, and early-warning systems. Also highlights the need to localize the production of solar PV panels and batteries, adopt advanced industrial equipment, and expand capacity in Monitoring, Reporting and Verification and climate finance readiness.</p>	<p>Focused on institutional capacity for data, monitoring, and evaluation.</p>	<p>Emphasized sub-national capacity building post-18th Constitutional Amendment.</p>

Finance Requirements	 <p>Identifies the requirement of 565.7 billion US dollars by 2035 for mitigation and adaptation actions, providing a sub-sectoral breakdown – almost in line with the World Bank estimates that Pakistan required climate-related investments of 348 billion US dollars by 2023, with an additional expense of 217.7 billion US dollars by 2035.</p>	<p>Highlighted greater reliance on international climate finance alongside self-financed actions, but did not explicitly state any consolidated figures.</p> <p>Put the energy transition costs at 101 billion US dollars and the cost of 14 billion–adaptation at 7 US dollars.</p>	<p>Estimated 40 billion US dollars for mitigation 14 billion US dollars—and 7 annually for adaptation.</p>
Financing Strategies and Sources	 <p>Identifies Green Budget Tagging initiative, blended finance models, carbon markets, Green Bonds launched in 2021 worth 500 million US dollars, and a recently launched Green Sukuk worth 20 billion Pakistani rupees. Includes transparency frameworks to track financing and mentions establishing climate finance units across ministries.</p>	<p>Identified instruments such as Green bonds, nature performance bonds, carbon pricing instruments, blue carbon credits, sustainable finance framework establishment and Public Private Partnerships (PPPs), but did not provide any details of how these instruments would be operationalized.</p>	<p>Provided a brief outline of federal budget allocations for climate-related actions</p>
Alignment with Global and National Goals	 <p>Sets more comprehensive targets and ambitions, with clearer costing, sectoral linkages, and integration with national priorities in planning and policy documents.</p>	<p>Had stronger alignment with the 1.5°C goal through ambitious and actionable strategies. No alignment with other national policies or plans.</p>	<p>Had limited alignment with the Paris Agreement due to its modest targets.</p>

Critical Analysis of NDCs 3.0

Pakistan's previous NDCs were criticized for their lack of an inclusive approach. Even the most relevant provincial departments and ministries were excluded from their formulation. While the authors of NDCs 3.0 claim to have followed a participatory, open and transparent approach, this does not reflect in the final document which includes no province-wise specific targets. This could potentially mean that either the provincial targets have been left at the discretion of provinces (making it almost impossible to collate and monitor them at the federal level) or decentralized provincial level targets have not been prioritized in the subjects that fall under the provincial domain. This gap allows ambiguities to creep into the document and is likely to hamper an effective implementation of the targets.

The NDCs 3.0 document also claims alignment with other national-level policies and plans, especially the National Economic Transformation Plan (2024 - 2029) – known as URAAN Pakistan – as well as the National Climate Change Policy (2012) – updated in 2021 – and provincial climate change policies and plans. It also purports to align itself with sectoral development policies and plans as well as with such core national goals as reducing poverty, ensuring food, water, and energy security, generating green jobs, improving skills and building disaster resilience. These decidedly tall claims by the Federal government, however, seem to have led to commitments and targets that are either unrealistic or are based on data and statistics that remain questionable. The details will follow.

The latest iteration of NDCs claims to incorporate the routes identified in the NDC 3.0 navigator¹¹, especially the “All-Of-Government and All-Of-Society” approach, or as the document claims, a “whole-of-nation” approach, involving planning departments, environment protection agencies (EPAs), local governments, civil society and academia. In reality, though, awareness about these contributions is seriously lacking across various parts of the government, especially among



11. NDC 3.0 Navigator – NDC 3.0 Navigator

provincial government departments and the local governments, with only the provincial government of Sindh having formally endorsed them¹². As far as acceptance by civil society and academia is concerned, that remains limited to a few non-governmental organizations closely aligned with the government and some academics working in public sector educational institutions.

A deeper dive into the NDCs 3.0 document shows that its language is rather defensive. Time and again, it stresses the fact that Pakistan's collective as well as per capita carbon footprint remains minuscule even when we consistently appear among the countries most vulnerable to climate change. Critics are quick to point out that this is neither a unique position nor a strong argument to convince the rest of the world about our climatic vulnerability and our climate finance needs. More than 170 countries are in the same state as we are vis-a-vis climate change and climate finance, these critics argue.

The language chosen by the authors of NDCs 3.0, though, does not appear un-intentional. Consider, for example, their projection that Pakistan will have an annual economic growth rate of 9 percent between 2025 and 2035. This is clearly an attempt to make a case for increasing rather than decreasing Pakistan's overall carbon footprint, citing its need to grow rapidly if it has to achieve its goals for social sector development, poverty-reduction and job creation. This certainly is a recipe for climatic neglect couched in development speak.

Another major problem with NDCs 3.0 projection for economic growth rate is that it is in complete contrast with several other projections. Both the International Monetary Fund (IMF) and the World Bank, for instance, put Pakistan's current and near future annual economic growth rate below 4 percent. Even the government's own budgetary and planning documents do not see the annual growth rate touching anything above 5 percent in the foreseeable future. To cite just one example, Pakistan's latest economic survey, released in June 2025, reports a GDP growth rate of 2.68 percent for 2025-26. This number clearly suggests that NDCs 3.0 have been formulated in an economic bubble rather than being based on a holistic and inclusive process that their authors claimed to have followed¹³.

Starting from its outlandish growth rate projections, the NDCs document expects Pakistan's national GHG emissions to reach 2,559 MTCO₂e by 2035. It then claims that these emissions will be brought down to 1280 MTCO₂e by 2035 – provided the required finance becomes available. In reality, these numbers appear more magical than realistic. The latest GHG emissions directory put together by the government, for instance, states that Pakistan's total GHG emissions have only increased from 405.07 MTCO₂e to 585 MTCO₂e in 10 years between 2015 and 2024. It is almost impossible to see how they will increase almost fivefold in the next decade.

12. Sindh govt approves NDC 3.0 policy to tackle climate change - Pakistan - Business Recorder

13. https://www.finance.gov.pk/survey/chapter_25/Highlights.pdf

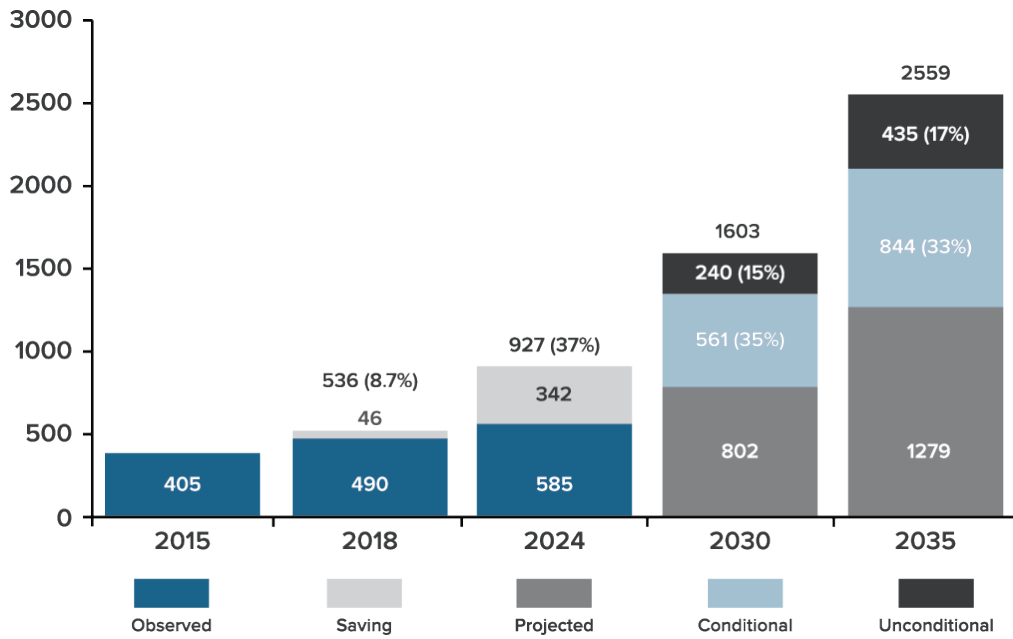


Figure 3: Pakistan's reported and projected GHG emissions in NDCs 3.0 (2015-2035)

A time series data reported by the Joint Research Centre (JRC) of the European Commission¹⁴ seems to corroborate this argument. It states that Pakistan's total emissions stood at 511.26 MTCO₂e in 2020 but were found to be 525.882 MTCO₂e in 2024, showing they went up only by 14 MTCO₂e. If GHG emissions are taken as a rough indicator of economic growth, then this number suggests Pakistan has suffered a serious decline in its economic growth between 2020 and 2024.

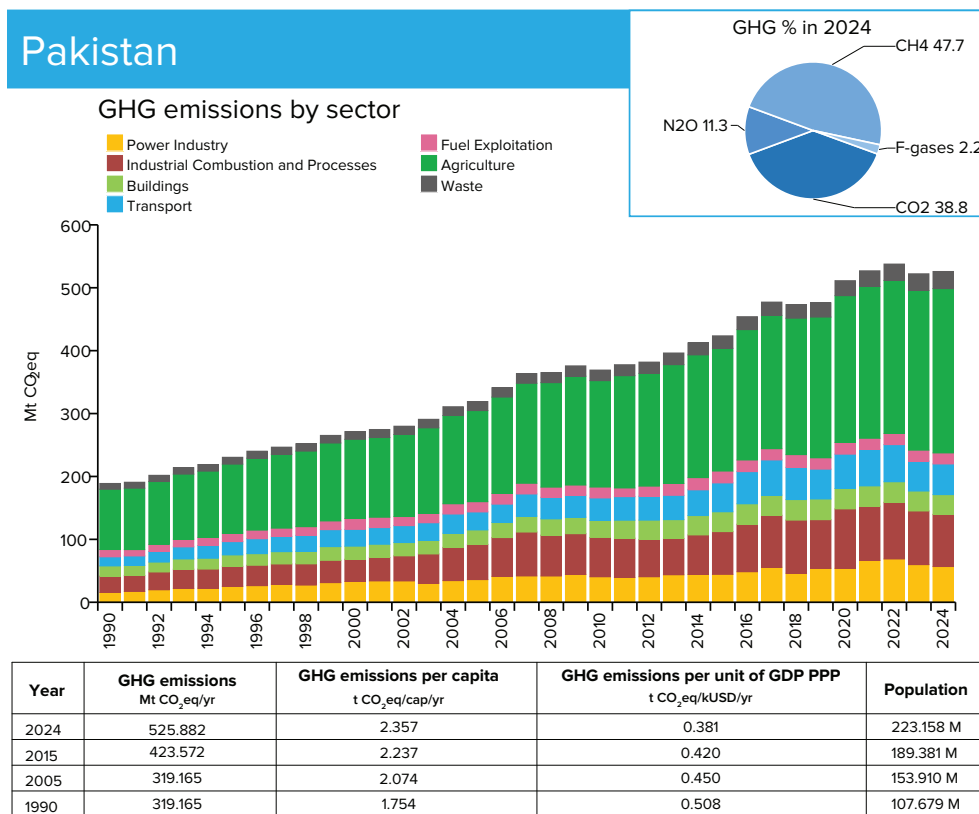


Figure 4: GHG Emissions by Sector for Pakistan – A yearly trend¹⁵

14. EDGAR - The Emissions Database for Global Atmospheric Research

15. EDGAR - The Emissions Database for Global Atmospheric Research

NDCs 2.0 also had the same problem. They projected Pakistan's GHG emissions to reach 1603 MTCO₂e by 2030, whereas the numbers for Pakistan's current and future economic growth rates tell a different story. Given these flawed and inaccurate projections, it is difficult to accurately measure whether the government is succeeding or failing in cutting down GHG emissions. Meanwhile, the government can easily claim to have offset emissions that do not even exist.

The document also lays great emphasis on the availability of international climate finance, especially grant-based and concessional private financing, to reduce Pakistan's GHG emissions by 33 percent – out of its overall commitment to reduce these emissions by 50 percent – by 2035. NDCs 3.0 cite Pakistan's national debt, servicing of which eats up 46.7 percent of the national budget, as a major hurdle in the availability of local finance for mitigation and adaptation measures. Rather than decreasing its non-development expenditure in line with the national economic requirements, the government of Pakistan has routinely used these financial constraints to justify its climate-related inaction.

Another major critique of the NDCs 3.0 document is that it does not specify any provincial-level targets. The document, indeed, does not explicitly mention the role of provinces in achieving the national GHG emission reduction targets or in implementing any adaptation or mitigation actions. This is despite the fact that most of the high GHG emitting sectors – transport, agriculture, industry etc – are provincial subjects under the 18th Amendment. Similarly, most of the adaptation measures, such as flood protection and the building of climate-resilient housing and infrastructure, have to be taken by the provincial authorities, where the federal government does not hold any jurisdiction. This creates an implementation divide, where targets and pledges are made by the federal government and imposed on the provinces without providing them with the appropriate capacity or financial resources to implement the required measures. Similarly, the responsibility of – as well as credit for – arranging climate finance lies entirely with the federal government. This leaves the provinces with no authority to negotiate the terms and conditions of the money that they will be spending on their climate mitigation and climate adaptation measures.

The NDCs document also boasts that the distributed off-grid solarization has led to the penetration of clean and renewable energy in the country, bringing Pakistan closer to its NDC commitments. It glosses over the fact that the rapid solarization was a purely market-based, consumer-driven bottom-up phenomenon.



The government has neither financed it nor encouraged it in a proactive and planned manner. The solarization, indeed, happened in spite of the government's attempts to slow it down or stall it altogether through measures such as decreasing the buy-back rate of net-metered solar installations and the imposition of a 10 percent blanket general sales tax on the use of solar PVs.

More worryingly, NDCs 3.0 exhibit a cavalier attitude towards data accuracy, glaringly manifested with reference to solarization. The document claims that Pakistan has spent 10 billion US dollars on importing solar PV panels from China, but offers no source for this information, whereas the data on solar PV trades for FY2024 states that the verified value of solar PV panel imports from China stands at only 2.0 billion US dollars¹⁶.

Similarly, the NDCs 3.0 state without any solid reference that the total installed capacity of the solar PV panels stands at a staggering 47 gigawatts, which is far above any of the realistic numbers. In fact, a recent satellite mapping study conducted by the federal energy ministry states that the total capacity of installed solar PV panels could be as low as 18 gigawatts¹⁷. Similarly, a recent on-ground survey conducted by my colleagues at the Policy Research Institute for Equitable Development (PRIED) shows that the quantum of installed solar PV in Pakistan could be 33 gigawatts¹⁸. These contradictory figures clearly show a lack of coordination and transparent data sharing among various government departments.

Moreover, portraying the market-led distributed solar expansion as a governmental achievement towards meeting Pakistan's renewable energy targets serves largely to mask the state's inaction on climate mitigation. Not just that. In a glaring contrast to its claim, the government continues to actively promote the development and utilization of domestic coal reserves, framing them as indigenous, affordable, and essential for ensuring national energy security.

In another rather ebullient part, the document claims that Pakistan will raise the share of renewables, including hydropower, to 38,472 megawatts over the next decade, thereby increasing the share of renewables in its energy mix from 35.2 percent in 2025 to 62 percent – against its commitment of 60 percent – by 2035. The NDCs build this argument on the power planning document called the Indicative Generation Capacity Expansion Plan (IGCEP), released by the power planner, NEPRA, which

16. [The_Great_Solar_Rush_in_Pakistan_38157451a3.pdf](#)

17. [Pakistan's off-grid and net-metered capacity hits 18,000 MW](#)

18. [priedpk.org/wp-content/uploads/2025/10/WHITE-PAPER-Solar-Revolution.pdf](#)

19. [nepra.org.pk/Admission Notices/2025/08 Aug/IGCEP_2025-35_R2.pdf](#)



plans to increase the country's hydropower generation by 6,200 megawatts between 2025 and 2035¹⁹. This massive focus on hydropower has a knock-on effect on the integration of the Variable Renewable Energy (VRE) – such as wind and solar – in the national energy mix. It also disregards the government's commitment – made in the Alternate Renewable Energy (ARE) Policy 2019 – to increase the share of variable renewable energy sources such as wind and solar in the energy mix to at least 30 percent by 2030. This omission puts a huge question mark over the claim of alignment of the NDCs 3.0 with other national policies.

The focus on hydropower also runs counter to the already established fact that large-scale hydropower projects have contributed to the worsening of climate-related disasters in Pakistan rather than having ameliorated them. It also completely ignores the fact that these projects lead to large-scale human displacement and the destruction of economic resources of the affected communities. They are also known globally to cause disruption of ecological order through massive damage to animal habitats and biodiversity and, perhaps most importantly, significantly changing river hydrology in both upstream and downstream areas.

Similarly, while talking about Electric Vehicles (EVs), NDCs 3.0 do not clearly mention that the major hurdle in their way is the availability of financing mechanisms to install their charging infrastructures and set up repair centers for them. The document makes a commitment to set up 3000 charging stations by 2030, in line with the New Energy Vehicles Policy 2025–2030, but does not specify where the financing for these stations will come from. Another important issue related to EVs is that NDCs 3.0 do not explain how the progress against the previous National Electric Vehicle Policy will be monitored.



19. [nepra.org.pk/Admission Notices/2025/08 Aug/IGCEP_2025-35_R2.pdf](https://nepra.org.pk/Admission%20Notices/2025/08%20Aug/IGCEP_2025-35_R2.pdf)

Lastly, the NDCs document pays only lip service to the elimination of fossil fuels in the energy sector. It does celebrate the fact that Pakistan has set up no new coal projects since it announced a moratorium on imported coal projects in 2021, and also mentions a 41 percent reduction in coal imports in 2024-25 compared to the previous years. Yet, it does not take into account the fact that Pakistan's coal footprint is highly likely to increase, given that the government is actively pursuing an expansion in local coal mining in Tharparkar. The additional coal to be mined locally will be utilized to convert power plants running on foreign coal to local coal, as well as to provide energy to cement, steel and fertilizer industries, through a railway line being rapidly built to link Tharparkar with industrial hubs in other parts of Pakistan. These carbon-intensive steps are bound to complicate and compromise the government's own commitment, as mentioned in NDCs 3.0, that GHG emissions from industrial processes will be reduced by 35 MTCO₂e in the next decade.

The NDCs document, instead, rather meekly mentions coal phase-down, stating that it will be achieved through such untested and costly technology as Carbon Capture Utilization and Storage (CCUS), which is termed a false solution globally. And then it hastens to add that this will only be possible if Pakistan is given the required finances as well as technologies, besides raising its capacity vis-à-vis this technology. In simpler words, this commitment sounds as empty as any false promise can be. This is especially galling given that discussions about a possible phaseout of coal-based power plants in Pakistan are being very eagerly debated in both the national and international arenas.



Recommendations

In light of the analysis presented above, we propose the following recommendations for improving the formulation and implementation of NDCs:

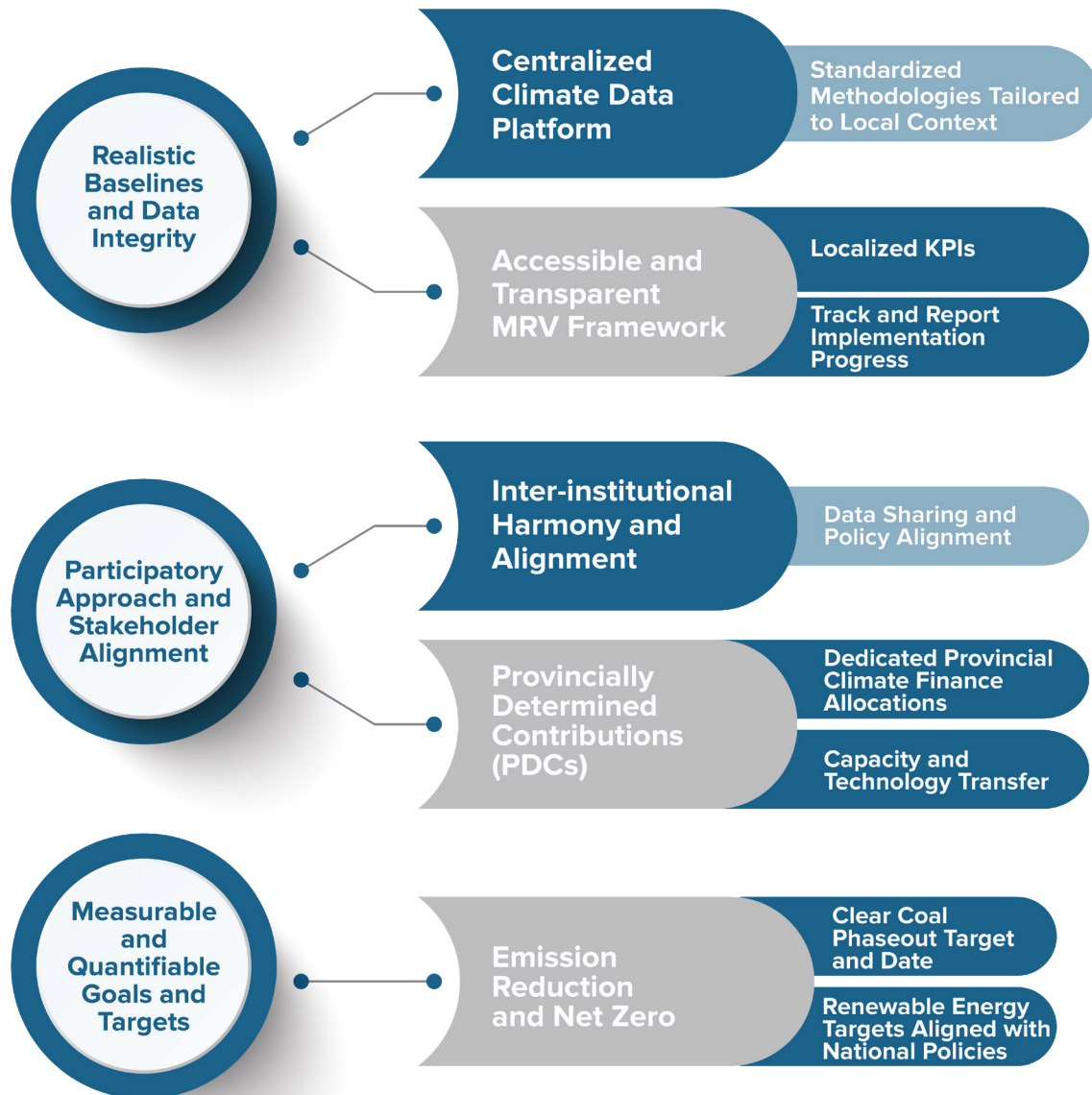


Figure 5: Policy Recommendations

1. Update the Business-as-Usual (BAU) baseline for GHG emission projections by aligning it with more realistic and contemporary economic growth forecasts and recent sectoral developments. Utilizing outdated baselines overstates the mitigation effort, whereas realistic numbers ensure accurate and verifiable emission reduction pathways.
2. Establish a centralized, interoperable Climate Data Platform across federal, provincial, and local government departments. Mandate the use of standardized methodologies and localized parameters for collecting, analyzing, and sharing climate-relevant data (such as GHG inventory, vulnerability assessments) to ensure consistent projections and a unified national evidence base.

3. Institute a mandatory “climate-proofing” mechanism, mandating that all new and existing national and provincial development policies, strategies and planning documents are taken into consideration while drafting the NDCs to avoid contradictions and conflicts.
4. Develop and immediately deploy a comprehensive Monitoring, Evaluation, and Reporting (MRV) framework that tracks NDC implementation progress at the national, provincial, and district levels. This framework should utilize Key Performance Indicators (KPIs) suited to local contexts, facilitate third-party verification and ensure periodic public reporting to maintain transparency and ensure accountability.
5. Adopt a “Provincially Determined Contributions” (PDCs) framework. Provinces must independently develop and submit their PDCs, detailing their specific, context-driven mitigation and adaptation actions and targets – as well as the resources they need. The national NDC would then be a synthesized and harmonized synthesis of these PDCs, fundamentally shifting the formation of NDCs from a top-down to a bottom-up, federated process.
6. Implement a sustained, specialized capacity-building program focusing on providing technical skills for provincial and district departments. The program must cover GHG inventory preparation, vulnerability and risk assessment, climate finance access, and the design of implementable, measurable provincial action plans that directly feed into PDCs.
7. Establish dedicated provincial climate resilience funds financed through a combination of public (federal/provincial budgetary allocations) and innovative private finance mechanisms (such as green bonds, Public-Private Partnerships). Simultaneously, implement a stringent, independent monitoring system to ensure that climate-tagged finance is transparently and exclusively used for the intended climate-related and rehabilitation projects.
8. Institutionalize a multi-stakeholder consultation process that actively involves subject experts, civil society organizations, academia, and local communities (especially vulnerable and marginalized groups) at every stage—from NDC drafting and PDCs formulation to their implementation and review. This participatory approach is crucial for ensuring equity, local ownership and social justice.
9. Set realistic, measurable, and quantifiable targets at the national and provincial levels, aligned with existing capacities and resources available for implementing mitigation and adaptation projects and building resilience, while catering to global emission reduction goals and moving towards net zero.
10. Formally announce a definitive, legally binding national coal phaseout date, which applies to both imported and indigenous coal. Create a mandatory plan to repurpose or strategically retire barely functional coal-fired power plants that drain public funds and are at a risk of becoming stranded assets, thereby signaling a firm commitment to decarbonization and a just transition for affected workers and regions.
11. Clearly disaggregate and define ambitious alternative renewable energy (ARE) targets (Solar, Wind, Geothermal) separately from large hydropower projects. These specific, clean ARE targets must be fully aligned with national and provincial energy policies to drive genuine energy transition and avoid reliance on large hydropower which often carries massive ecological and social impacts.



PRIED

Policy Research Institute
for Equitable Development

Plot no: 5-N, (Second Floor), Sitara Market, G-7/2, Islamabad.

T: +92 51 8440512 | E: Info@priedpk.org

www.priedpk.org