

**United Nations Human Rights Committee (UNHRC)  
State Review – 142 Session (14 Oct 2024 - 07 Nov 2024)**

**Pakistan**

**September , 2024**

**A Submission by the International Human Rights Desk**

**The International Human Rights Desk**

The International Human Rights Desk (IHRD), was established in November 2023, by the Head of the Ahmadiyya Muslim Community, Hazrat Mirza Masroor Ahmad, to address the escalating human rights abuses and persecution faced by Ahmadis across the world.

Through strategic advocacy, campaigns, and partnerships, IHRD works towards challenging discriminatory laws, raising international awareness, and engaging with key stakeholders to address the root causes of these abuses.

Guided by the Islamic principles of justice, fairness, equality, and freedom of faith and belief as well as the Ahmadiyya Muslim Community's motto of *Love for All, Hatred for None*, IHRD's mission extends to championing human rights globally. While the primary focus is on addressing the specific plight of Ahmadis, the organisation also aims to shine a spotlight on human rights abuses worldwide, particularly those rooted in religious hatred. IHRD advocates for a world where individuals of all faiths and beliefs coexist peacefully, free from fear and discrimination.



## EXECUTIVE SUMMARY

*Pakistan's treatment of Ahmadi Muslims is in flagrant violation of its obligations under international law, most notably the International Covenant on Civil and Political Rights (ICCPR). Pakistan's Constitution declares Ahmadi Muslims to be non-Muslim, thereby depriving them of the freedom to adopt a religion of their choice, in violation of Article 18 of the ICCPR. Pakistan's Penal Code contains anti-Ahmadi and anti-blasphemy provisions that prohibit Ahmadi Muslims from manifesting any aspect of their faith as Muslims, also in violation of Article 18. Pakistan disenfranchises Ahmadi Muslims by placing them on an electoral roll separate from all other citizens, who are entitled to vote in a joint electorate, in violation of Article 25(b) of the ICCPR. Pakistan requires every passport applicant and national identity card applicant to make a declaration of faith, and requires any citizen who wishes to be known as Muslim thereon, to make a declaration denouncing Ahmadi Muslims as non-Muslim, in violation of Articles 12 and 20 of the ICCPR. Additionally, Pakistan has failed to protect the life and liberty of Ahmadi Muslims, and governmental authorities (particularly at the provincial and local level) are often complicit in advocating religious hatred against Ahmadi Muslims, in direct violation of Articles 6, 18, and 20 of the ICCPR. The persecution of Ahmadis extends beyond issues of religious freedom, encompassing broader aspects of civil and political rights. As a result, a majority of the Articles of the ICCPR are being violated.*

*In recent years, extremist groups, notably Tehreek-e-Labaik Pakistan (TLP), have intensified their coordinated campaign against Ahmadi Muslims by targeting their mosques, desecrating graves, and preventing them from performing Eid ritual sacrifices. In 2023/2024 alone, dozens of Ahmadi mosques were attacked, and hundreds of graves were desecrated, often with the involvement or tacit approval of local authorities. In the last few years, Ahmadis have also increasingly been arrested for performing ritual sacrifices on Eid-al-Adha, facing legal action and violence for practices central to their faith.*

*Furthermore, Pakistan's government has expanded its persecution into the digital realm, targeting Ahmadis for their online activities and censoring websites and apps associated with the Ahmadiyya Muslim Community. The Pakistan Telecommunication Authority (PTA) has blocked or removed Ahmadi content from platforms hosted both within and outside Pakistan, including in countries such as the U.S., U.K., Australia, Singapore, and Switzerland, further violating Articles 18 and 19 of the ICCPR.*

*Despite ratifying the ICCPR and removing initial reservations, Pakistan has made negligible progress in respecting the rights of Ahmadi Muslims. Systemic and institutionalized persecution persists, with extremist non-state actors continuing to commit acts of violence against Ahmadis with impunity. Pakistan's actions represent a systematic and deliberate violation of its international human rights obligations, perpetuating a regime of religious and political apartheid against Ahmadi Muslims. The international community should continue to urge Pakistan to take concrete steps to protect the rights and freedoms of this extremely vulnerable minority.*

### **I. INTRODUCTION**

1. The Ahmadiyya Muslim Community (“AMC”) firmly adheres to Islam. Ahmadi Muslims believe that the founder of their Community, Hadhrat Mirza Ghulam Ahmad of Qadian, India, to be a subordinate non-law bearing prophet. He is regarded by the Community as the same Messiah and Reformer foretold by Prophet Muhammad and awaited by all Muslims. Estimates of the number of Ahmadi Muslims currently residing in Pakistan are difficult to obtain due to the persecution they face, with figures ranging from approximately half a million to several million.<sup>1</sup>
2. The state-sponsored persecution that Ahmadi Muslims face in Pakistan stems from the assertion by some Muslim sects that Ahmadis are not Muslim. Ahmadis firmly believe that they are Muslim and fall within the pale of Islam. They believe in the five pillars of Islam universally accepted by all Muslims and believe that the Prophet Muhammad is the greatest and last law bearing prophet.

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<sup>1</sup> See M. Nadeem Ahmad Siddiq, “Enforced Apostasy: Zaheerudin v. State and the Official Persecution of the Ahmadiyya Community in Pakistan,” JOURNAL OF LAW AND INEQUALITY, Vol. 14, 1995, at pp. 275, 279.; *Ahmadiyas in Pakistan*, Minorities Rights Group, <https://minorityrights.org/communities/ahmadiyas/>.

3. On June 23, 2010, Pakistan took a positive step to ratify the ICCPR.<sup>2</sup> Since April 17 2008, Pakistan has been a party to the ICESCR and the UNCAT.
4. Upon ratification of the ICCPR, it originally expressed several formal reservations, including the following: “The Islamic Republic of Pakistan declares that the provisions of Articles 3, 6, 7, 18 and 19 shall be so applied to the extent that they are not repugnant to the Provisions of the Constitution of Pakistan and the Sharia laws.”<sup>3</sup> In response to urgings from the European Union, however, Pakistan *withdrew* its reservations to Articles 6, 7, 8, 18, and 19 in June 2011.<sup>4</sup> As a result, those ICCPR articles now apply with full force to Pakistan.
5. Despite these steps, very little progress has been made to respect, protect and fulfill the rights of Ahmadi Muslims in Pakistan. As a result of institutionalized persecution and targeted violence perpetrated by extremist non-state actors who act with impunity, Pakistan has failed in its duty to live up to its international human rights obligations.<sup>5</sup> In 2024, a group of independent UN experts “*expressed grave concern regarding a reported upsurge in discrimination and violence against Ahmadi Muslims in Pakistan, including extrajudicial killings, arbitrary arrests and detentions, attacks on places of worship and curtailment of free expression, peaceful assembly and association.*”<sup>6</sup>

## II. ISSUES OF CONCERN SINCE PREVIOUS REVIEW

### A. Legal Restrictions on Freedom of Religion of Ahmadi Muslims Are Still in Place (ICCPR Art. 18)

6. According to concluding observations made by the HRC during Pakistan’s last review, the Committee stated that it “is concerned by the blasphemy laws...that carry severe penalties...and reportedly have a discriminatory effect, particularly on Ahmadi persons.”<sup>7</sup> The Committee called on the state party to “[r]epeal all blasphemy laws or amend them in compliance with the strict requirements of the Covenant including as set forth in the Committee’s general comment No. 34 (2011) on the freedoms of opinion and expression, para. 48.”<sup>8</sup> Despite this, Pakistan has yet to repeal targeted legal restrictions on the ability of AMC to practice their beliefs freely. It has failed to amend or repeal Article 260(3) and the Second Amendment to Pakistan’s Constitution, which taken together, legally declare Ahmadis to be “non-Muslims.”<sup>9</sup>

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<sup>2</sup>UN Treaty Collection Status of Treaties, International Covenant on Civil and Political Rights, <https://treaties.un.org/Pages/ViewDetails.aspx?chapter=4&clang=en&msgid=IV-4&src=IND>; Despite ratifying the ICCPR, as of June 2022, Pakistan was behind on three different reporting requirements per its obligations under its ratified treaties: *See OHCHR: Compliance By States Parties with their Reporting Obligations to International Human Rights Treaty Bodies* (3 June 2022) available at <https://www.ohchr.org/sites/default/files/2022-05/Reporting-Compliance-report-for-CM34.docx>

<sup>3</sup> *Id.*

<sup>4</sup> *Pakistan Decides to Withdraw Most of Reservations on ICCPR, UNCAT*, THE NATION (June 23, 2011), available at <https://www.nation.com.pk/23-Jun-2011/pakistan-decides-to-withdraw-most-of-reservations-on-iccpr-uncat>.

<sup>5</sup> *See generally* Qasim Rashid, “Pakistan’s Failed Commitment: How Pakistan’s Institutionalized Persecution of the Ahmadiyya Muslim Community Violates The International Covenant on Civil and Political Rights,” *Richmond Journal Of Global Law And Business*, Vol. 11, No. 1, Winter 2011, available at <https://scholarship.richmond.edu/cgi/viewcontent.cgi?article=1137&context=global>; Amjad Mahmood Khan, Esq., *Testimony: Tom Lantos Human Rights Commission* (2021, 2022) available at [https://chrismith.house.gov/uploadedfiles/amjad\\_mahmood\\_khan\\_testimony\\_before\\_tlhrc\\_-\\_7-13-21\\_-\\_final.pdf](https://chrismith.house.gov/uploadedfiles/amjad_mahmood_khan_testimony_before_tlhrc_-_7-13-21_-_final.pdf), <https://humanrightscommission.house.gov/events/hearings/state-religious-freedom-around-globe>

<sup>6</sup> *Pakistan: Experts Urge Immediate End to Discrimination and Violence Against Ahmadis*, Office of the High Commissioner for Human Rights (OHCHR), (July 2024), <https://www.ohchr.org/en/press-releases/2024/07/pakistan-experts-urge-immediate-end-discrimination-and-violence-against>.

<sup>7</sup> Human Rights Committee (HRC), *Concluding Observations on the Initial Report of Pakistan*, U.N. Doc. CCPR/C/PAK/CO/1, 7 (Aug. 23, 2017), <https://documents.un.org/doc/undoc/gen/g17/246/36/pdf/g1724636.pdf>.

<sup>8</sup> *Id.*

<sup>9</sup> PAK. CONST. art. 260, § 3, available at [https://na.gov.pk/uploads/documents/1333523681\\_951.pdf](https://na.gov.pk/uploads/documents/1333523681_951.pdf).

7. Nor has Pakistan abolished anti-Ahmadi provisions within Pakistan’s Penal Code (“PPC”). In 1984, General Zia promulgated Ordinance XX, which amended and added Sections 298-B and 298-C to Pakistan’s PPC.<sup>10</sup> Ordinance XX prohibits Ahmadis from “indulging in anti-Islamic activities.” They are barred from using any honorific titles or epithets specific to Islam, building Mosques, displaying the *Kalima* (the creed of Islam), or reciting the *Azan* (call to Muslim prayer). Ahmadis also cannot “pose” as Muslims, call or refer to their faith as Islam, or to preach or propagate their faith. Any act by an Ahmadi which is perceived by any person in Pakistan as being associated with Islam is deemed a criminal and arrestable offense punishable with up to 3 years imprisonment.
8. These constitutional and legal provisions clearly violate Article 18. Article 260(3) and Ordinance XX deny Ahmadis the right to freely choose and practice a religion, both individually and communally. Ordinance XX further criminalizes any manifestation of Islamic faith by an Ahmadi. General Comment No. 22, which constitutes an authoritative interpretation of Article 18, clearly states that “[t]he freedom to manifest religion or belief in worship, observance, practice and teaching encompasses a broad range of acts . . . including the building of places of worship, the use of ritual formulae and objects, the display of symbols . . . [and] the freedom to establish seminaries or religious schools and the freedom to prepare and distribute religious texts or publications.”<sup>11</sup> Ordinance XX denies Ahmadis each of these rights. Any justification of these provisions under Article 18(3) or Article 19(3) is without any legal or factual basis. The ICCPR’s “public order (*ordre public*)” and “morals” exception in Articles 18 and 19 cannot justify domestic laws of acceding nations that (1) restrict the freedoms of religion and expression based “exclusively” on “morals” specific to one “single tradition” (e.g., Islam); (2) evidence a “discriminatory purpose” or are “applied in a discriminatory manner”; and (3) “discriminate . . . against . . . one religious or belief system.” Significantly, General Comment No. 34 identifies “blasphemy laws” as being “incompatible with the Covenant.”
9. Since 1984 over 227 Ahmadi Muslim mosques have been set on fire, sealed, halted or demolished.<sup>12</sup> Recently, the religious group *Tehreek-e-Labaik* Pakistan (TLP) has conducted an escalating campaign against the community and its mosques. The group has exerted pressure on local government authorities to demolish religious structures and has continued to attack, with impunity, mosques, cemeteries, and other heritage sites belonging to the community.<sup>13</sup>
10. In 2023, there were 44 attacks on Ahmadi mosques — many conducted by or in the presence of authorities — and 109 graves were destroyed or desecrated.<sup>14</sup> The National Commission For Human Rights Pakistan (NCHR) has observed that the Lahore High Court has issued an order explicitly stating that the minarets on Ahmadi

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<sup>10</sup> PAK PENAL CODE, §§ 298B, 298C (made part of Penal Code by Presidential Ordinance No. 20 (1984), The Gazette Of Pakistan Extraordinary, Apr. 26, 1984), available at <http://www.pakistani.org/pakistan/legislation/1860/actXLVof1860.html>. The Supreme Court of Pakistan has upheld Ordinance XX against a legal challenge. *Zaheerudin v. State*, 26 S.C.M.R. 1718 (S.Ct. 1993) (Pak.). *Zaheerudin v. State* was a 4-1 ruling led by Justice Abdul Qadeer Chaudhry, holding that Ordinance XX was in accord with statutes and judicial opinions in England and the United States that protect religious freedom; the majority erroneously cited legal precedent from both jurisdictions as false support. See also Amjad Mahmood Khan, “Misuse and Abuse of Legal Argument by Analogy in Transjudicial Communication: The Case of *Zaheerudin v. State*,” *Richmond Journal Of Global Law And Business*, Vol. 10, No. 4, Fall 2011, available at [https://rjglb.richmond.edu/files/2013/03/rjl\\_10-4\\_khan.pdf](https://rjglb.richmond.edu/files/2013/03/rjl_10-4_khan.pdf).

<sup>11</sup> Human Rights Committee, 48<sup>th</sup> session, General Comment 22 Article 18 (1993), U.N. Doc. CCPR/C/21/Rev.1/Add.4 (1993), reprinted in *Compilation of General Comments and General Recommendations Adopted by Human Rights Treaty Bodies*, U.N. Doc. HRI/GEN/1/Rev.6 at 155 (2003), available at <https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2FPPrICAqhKb7yhsjYoiCfMKoIRv2FVaVzRkMjTnjRO%2Bfud3cPvrcM9YR0iUh4ivOtm7YUcKE6R1aBpKmYAstxgdf4vXLMslHe1LcOio8z%2F9pGJsaC2JNOOTO4jAaVkJCo02vVbw65HVERDhH%3D%3D>.

<sup>12</sup> Ahmadiyya Muslim Community, *A Report on the Persecution of Ahmadis in Pakistan during the Year 2016*, 129 (2017).; Ahmadi Muslims: Pakistan, Hansard, HC Deb (6 Sept. 2023), <https://hansard.parliament.uk/commons/2023-09-06/debates/874C520A-873F-4FAF-A0D9-68A63A99EA1D/AhmadisMuslimsPakistan>.

<sup>13</sup> *Pakistan’s Ahmadis Living in Fear as Graves, Religious Sites attacked*, Al Jazeera (Sept. 27, 2023), <https://www.aljazeera.com/news/2023/9/27/pakistans-ahmadis-living-in-fear-as-graves-religious-sites-attacked>.

<sup>14</sup> Int’l Human Rights Desk, *2023 Annual Report: Persecution of Ahmadis in Pakistan*, 9 (2024), available at <https://drive.google.com/file/d/1Rh-WuEE2nC4zM8ypOihvBnCWILxpsIfG/view>.

worship places, constructed before the 1984 law, cannot be demolished or altered. Despite this clear and legally binding court order, several older worship places of the Ahmadi community have been subjected to attacks and acts of vandalism in recent times.<sup>15</sup> For instance, in April 2023, a mob attacked the Ahmadi mosque in Ghooghiat, Punjab, where they demolished the dome and several of its century-old minarets in the presence of police. Similarly, in May 2023, a mob of around 150 people vandalized another Ahmadi mosque in Mirpur Khas District, destroying four of its minarets.<sup>16</sup> On September 4, 2023, a mob stormed Ahmadiyya Hall in Karachi for the second time in the year and demolished its minarets. The mob also vandalized the mosque and beat innocent Ahmadis inside.<sup>17</sup> In June 2024, during the early hours of the Eid holiday, an Ahmadi mosque in the Kotli district of Azad Jammu and Kashmir (AJK) was violently attacked. A mob of approximately 150 people stormed the mosque, armed with iron rods, hammers, and firearms. The attackers vandalized the mosque, tearing down its minarets and arch. Several members of the community were seriously injured, including the caretaker, Wajid Hussain, who was severely beaten and is now in critical condition in the hospital.<sup>18</sup>

11. In the past five to six years, the TLP has also intensified its campaign to prevent Ahmadis from performing ritual animal sacrifices on Eid-al-Adha. In July 2023, there were 23 complaints filed against Ahmadis for carrying out the Eid sacrifice. A total of 89 Ahmadis were harassed by the police, with 13 formally accused in six different cases. Additionally, 10 sacrificial animals were illegally seized, and five Ahmadi houses were unlawfully targeted by the police.<sup>19</sup> In July 2024, 36 Ahmadis were arrested and detained for performing these sacrifices. Among them, 23 were preventatively detained under the Punjab Maintenance of Public Order Ordinance, 18 were criminally charged under Section 298-C of the Pakistan Penal Code, and 3 were prevented from attending Eid prayers.<sup>20</sup> Several criminal complaints against Ahmadis were filed for simply purchasing a goat for sacrifice or merely keeping one in the house. These complaints often accuse them of “portraying” themselves as Muslims and hurting the religious sentiments of other Muslims.<sup>21</sup>
12. The government of Punjab has banned the printing, publication, and distribution of Ahmadi religious literature, including community press materials, books, periodicals and the Holy Quran.<sup>22</sup> In February 2024, the Supreme Court of Pakistan granted bail to an Ahmadi Muslim detained for allegedly distributing a proscribed commentary on the Holy Quran, and referenced in *obiter* remarks the Quranic principle of non-compulsion in matters of religion and Article 20 of Pakistan’s Constitution, which ensures the right to profess, practice, and propagate one’s religion.<sup>23</sup> The Court noted in a subsequent July revised decision that while Ahmadis are non-Muslim according to the constitution and law, they are permitted to practice and preach their faith, provided they do not use Muslim terms or present themselves as Muslims in public. Furthermore, the Court affirmed

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<sup>15</sup> National Commission for Human Rights (NCHR), *Report on the Violations of the Rights of the Ahmadiyya Community in Pakistan*, (April 2024), available at <https://www.nchr.gov.pk/wp-content/uploads/2024/04/Ahmadiya-Report.pdf>.

<sup>16</sup> U.S. Comm’n on Int’l Religious Freedom, 2024 Annual Report 41 (2024), <https://www.uscirf.gov/sites/default/files/2024-05/USCIRF%202024%20Annual%20Report.pdf>.

<sup>17</sup> Amjad Mahmood Khan, Esq., Testimony: Tom Lantos Human Rights Commission 4 (2024), <https://www.uscirf.gov/sites/default/files/Testimony%20of%20Amjad%20Mahmood%20Khan%20before%20USCIRF.pdf>.

<sup>18</sup> Shafique Khokhar, *In Kashmir, Extremists Target Ahmadis, Injuring Worshippers, Tearing Down Minarets*, AsiaNews.it (Feb. 15, 2024), <https://www.asianews.it/news-en/In-Kashmir,-extremists-target-Ahmadis,-injuring-worshippers,-tearing-down-minarets-60147.html>.

<sup>19</sup> Int’l Human Rights Desk, *supra*, note xiv, at 10.

<sup>20</sup> Int’l Human Rights Desk, *Attacks and Prohibitions Against Ahmadis Celebrating the Eid-ul-Adha Festival in Pakistan: A Special Human Rights Report* 6 (2024).

<sup>21</sup> *Pakistan: Authorities Must end Escalating Attacks on Minority Ahmadiyya Community*, Amnesty International (Jun. 21, 2024), available at <https://www.amnesty.org/en/latest/news/2024/06/end-escalating-attacks-on-minority-ahmadiyya-community/>.

<sup>22</sup> *Press and Publication Ban*, Persecution of Ahmadis, <https://persecutionofahmadis.org/press-and-publication-ban/>.

<sup>23</sup> *Pakistan: Supreme Court Releases on Bail an Ahmadi Muslim Detained for Distributing Proscribed Commentary on Holy Quran*, Global Legal Monitor, Library of Congress (Mar. 10, 2024), <https://www.loc.gov/item/global-legal-monitor/2024-03-10/pakistan-supreme-court-releases-on-bail-an-ahmadi-muslim-detained-for-distributing-proscribed-commentary-on-holy-quran/>.



Ahmadis' right to privacy within their homes and places of worship, within "reasonable limits" prescribed by law. However, this limited constitutional space afforded to Ahmadis was quickly retracted due to a pressure campaign against the chief justice by religious organizations and political parties.<sup>24</sup>

13. On April 27, 2023, police in Karachi arrested Ali Ahmed Tariq, a 77-year-old Ahmadi Muslim lawyer, for charges under section 298-B for using the honorific title "Syed," a designation traditionally reserved for descendants of the Prophet Muhammad.<sup>25</sup> The government contended that the title "Syed" should be restricted to Muslims, thereby excluding Ahmadis. Although the Sindh High Court granted Tariq bail on May 23, he was promptly rearrested due to a 1992 complaint in Shahadpur, Sindh, accusing him of using the common Islamic greeting "Assalam-o-Alaikum." Tariq was granted bail in the second case on November 11, and both cases remain pending as of now.<sup>26</sup>
14. Apart from Article 260(3) and Ordinance XX, Ahmadis are also targeted by the broad anti-blasphemy provisions in Pakistan's PPC.<sup>27</sup> Between 1984 and 2022, there were nearly 1600 blasphemy and other religious-based cases against Ahmadis.<sup>28</sup> Some estimates are close to 4,458 cases have registered against Ahmadi Muslims under these laws.<sup>29</sup> Ahmadi Muslims now account for nearly 40% of all arrests under Pakistan's anti-blasphemy laws. In 2023, 133 Ahmadi Muslims were booked by the police, with 27 of them arrested. Additionally, 19 new cases against Ahmadi Muslims were registered under Pakistan's anti-blasphemy and anti-Ahmadi laws during the same year.<sup>30</sup> As of the end of 2023, six Ahmadi Muslims remain in prison for their faith. Five of them have been incarcerated since 2020 and were denied bail, even by the Supreme Court.<sup>31</sup> Frivolous and spurious blasphemy cases are routinely filed against Ahmadi Muslims to settle personal scores and business rivalries.<sup>32</sup>

## B. Systematic Persecution of Ahmadi Muslims (ICCPR Articles 6, 18(2) and 20(2))

15. The concluding observations made by the HRC during its last review calls on Pakistan to "[e]nsure that all those who incite or engage in violence against others based on allegations of blasphemy, as well as those who falsely

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<sup>24</sup> Abdullah Momand, *Mubarak Sani Case: Supreme Court Accepts Punjab Govt's Application Against Revised Verdict*, Dawn (Aug. 22, 2024), <https://www.dawn.com/news/1853956>.

<sup>25</sup> Tariq Ahmad, Library of Congress, *Pakistan: Sindh High Court Releases on Bail Ahmadi Lawyer Arrested for Using Title "Syed" in His Name* (June 21, 2023), <https://www.loc.gov/item/global-legal-monitor/2023-06-21/pakistan-sindh-high-court-releases-on-bail-ahmadi-lawyer-arrested-for-using-title-syed-in-his-name/>.

<sup>26</sup> U.S. Dep't of State, *2023 Report on International Religious Freedom: Pakistan* (2023), <https://www.state.gov/reports/2023-report-on-international-religious-freedom/pakistan/>.

<sup>27</sup> Blasphemy in Pakistan broadly refers to any spoken or written representation that "directly or indirectly" outrages the religious sentiments of Muslims. See Amjad Mahmood Khan, "Persecution of the Ahmadiyya Community in Pakistan: An Analysis Under International Law and International Relations," HARVARD HUMAN RIGHTS LAW JOURNAL, Vol. 16, Spring 2003, at p. 227, available at <https://heinonline.org/HOL/P?h=hein.journals/hhrj16&i=223>.

<sup>28</sup> *A Report on the Persecution of Ahmadis in Pakistan during the Year 2016*, *supra* note xi at 129.; See also JINNAH INSTITUTE, STATE OF RELIGIOUS FREEDOM IN PAKISTAN 26 (2015), <https://jinnah-institute.org/publication/state-of-religious-freedom-in-pakistan/#:~:text=Recent%20years%20have%20witnessed%20an,the%20minority%20sects%20of%20Islam.>; See also U.S. Dep't of State, *International Religious Freedom Report for 2014 - Pakistan*, (Oct. 14 2015), available at <https://www.state.gov/j/drl/rls/irf/2014religiousfreedom/index.htm#wrapper>; U.S. Comm'n on Int'l Religious Freedom (USCIRF), *2016 Annual Report: Pakistan*, (April 2016) (Covering Feb. 1, 2015 to Feb. 29, 2016), available at [https://www.uscifr.gov/sites/default/files/USCIRF\\_AR\\_2016\\_Tier1\\_2\\_Pakistan.pdf](https://www.uscifr.gov/sites/default/files/USCIRF_AR_2016_Tier1_2_Pakistan.pdf);

U.S. Dep't of State, *International Religious Freedom Report for 2015 - Pakistan*, (Aug. 10, 2016), available at <https://www.state.gov/j/drl/rls/irf/religiousfreedom/index.htm#wrapper>

<sup>29</sup> Khan, *supra*, note xvii, at 4.

<sup>30</sup> *Id.* at 5-6.

<sup>31</sup> *Id.* at 5.

<sup>32</sup> *Id.* at 8.

accuse others of blasphemy, are brought to justice and duly punished.” Pakistan has failed to protect the life, liberty and security of Ahmadis. They continue to be victims of violence and persecution. According to NCHR report, from 1984 to 2023, 280 Ahmadis have been killed and 415 have been assaulted for their faith.<sup>33</sup> Other estimates close to over 400 Ahmadis have been killed for their faith since the country was founded.<sup>34</sup>

16. On May 28, 2010, 86 Ahmadis were killed and more than 120 were injured in nearly simultaneous attacks against two Ahmadi Muslim Mosques, perpetrated by the *Tehrek-i-Taliban Pakistan (TTP)*. This was the single worst act of violence against the Community to date.<sup>35</sup>
17. In 2012, in Karachi, Ahmadis were subject to an orchestrated campaign of targeted attacks that claimed at least 10 Ahmadi lives, including a local President.<sup>36</sup>
18. On July 27, 2014, a violent mob attacked, ransacked, and looted homes and shops of Ahmadis in Gujranwala, resulting in the death of an elderly woman and two children. The attack took place in the presence of police who took no effective action to stop the mob,<sup>37</sup> and occurred after a false allegation was made against a young Ahmadi for posting a blasphemous picture on Facebook.<sup>38</sup>
19. In November 2015, a mob set ablaze an Ahmadi-owned chipboard factory, in Jhelum, Punjab. Ahmadi employees were falsely accused of desecrating the Quran. Three Ahmadis were arrested and charged at the time of the incident. No perpetrator has been convicted.<sup>39</sup>
20. In more recent years, Pakistan’s persecution of Ahmadis has taken a high-tech turn. In mid-December 2020, trolls in Pakistan launched a coordinated hate and disinformation campaign on social media against the Ahmadiyya Muslim Community which has resulted in the uptake of hate crimes and murders of members of the already vulnerable minority group.<sup>40</sup> This coordinated hate campaign had its intended effect. In 2020-2021, there was a series of targeted killings of Ahmadis, many of which occurred in the city of Peshawar. In July 2020, a 19-year-old assailant killed Tahir Naseem in what was supposed to be a secure courtroom in Peshawar. An Ahmadi trader in Peshawar was shot near his business on August 12 2020. On October 5 2020, Ahmadi professor Naemuddin Khattak was shot and killed while driving home from work. On November 9 2020, also in Peshawar, unknown gunmen killed an 82-year-old retired Ahmadi Muslim government worker while he was waiting for a bus.<sup>41</sup> In Feb 2021, a teenager shot and killed an Ahmadi homeopathic doctor, Abdul Qadir, in Peshawar, Khyber Pakhtunkhwa. On September 2, 2021, unidentified assailants shot and killed Maqsood Ahmad, a dual British-Pakistani citizen and Ahmadi Muslim in Nankana Sahib, Punjab<sup>42</sup>
21. On February 19, 2023, Dr. Muhammad Rasheed, an Ahmadi homeopath in his 70s with Norwegian nationality, was shot and killed by two assailants posing as patients at his clinic in Goteriāla, District Gujrat, Punjab. On

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<sup>33</sup> NCHR, *supra*, note xv, at 6.

<sup>34</sup> Khan, *supra*, note xvii, at 6.

<sup>35</sup> See *supra*, note xii.

<sup>36</sup> Asian Human Rights Comm’n, *PAKISTAN: Investigation failure leads to the killings of Ahmadis* (May 27, 2016), <http://www.ahrchk.org/ruleoflawasia.net/news.php?id=AHRC-STM-082-2016>; *Ahmadi Man Gunned Down in Suspected Sectarian Attack in Karachi*, Dawn.com (Nov. 28, 2016), <https://www.dawn.com/news/1298985>;

<sup>37</sup> Asian Human Rights Comm’n, *Pakistan: Destruction of Places of Worship is a Systematic Persecution of Religious Minorities*, AHRC News (Sept. 25, 2014),

<http://www.humanrights.asia/news/ahrc-news/AHRC-STM-144-2014/>.

<sup>38</sup> *Id.*

<sup>39</sup> *Jhelum Rioters Arrested*, NEWSWEEK PAKISTAN (Nov. 25 2015),

<http://newsweekpakistan.com/jhelum-rioters-arrested/>.

<sup>40</sup> Gannon, K. *Trolls flood social media in Pakistan amid virus lockdown*. AP NEWS (August 27, 2020), available at

[https://uk.news.yahoo.com/trolls-flood-social-media-pakistan-060613909.html?guce\\_referrer=aHR0cHM6Ly93d3cuZ29vZ2xiLmNvbS8&guce\\_referrer\\_sig=AQAAAFViS7zpnPc5KRfu\\_Zy4kou6xS\\_k2Ob6\\_WupXUEJI97x7mjWO6\\_w3vVOz46k9NqjAT0tPD6xW\\_VryxuuOq8ji9SpCrcb-gQuLGcS6KfT\\_5Hoe3\\_6oag4KDaz6cSKDV5Lb9-6VYtMLFjBCPXf\\_DO5SarTqUJX7BaqjL\\_-JA7IrrF](https://uk.news.yahoo.com/trolls-flood-social-media-pakistan-060613909.html?guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xiLmNvbS8&guce_referrer_sig=AQAAAFViS7zpnPc5KRfu_Zy4kou6xS_k2Ob6_WupXUEJI97x7mjWO6_w3vVOz46k9NqjAT0tPD6xW_VryxuuOq8ji9SpCrcb-gQuLGcS6KfT_5Hoe3_6oag4KDaz6cSKDV5Lb9-6VYtMLFjBCPXf_DO5SarTqUJX7BaqjL_-JA7IrrF).

<sup>41</sup> OHCHR Report on Disinformation; AMLA Submission (2021). available at

<https://www.ohchr.org/sites/default/files/Documents/Issues/Expression/disinformation/2-Civil-society-organisations/Ahmadiyya-Muslim-Lawyers-Association.pdf>.

<sup>42</sup> U.S. Comm’n on Int’l Religious Freedom (USCIRF), *2021 Annual Report: Pakistan*,

<https://www.state.gov/wp-content/uploads/2022/05/PAKISTAN-2021-INTERNATIONAL-RELIGIOUS-FREEDOM-REPORT.pdf>

April 13, 2023, Advocate Munir, an Ahmadi lawyer in Lalian, was attacked with a cleaver by a religious fanatic, resulting in a head injury. He was taken to the hospital for treatment. On April 27, 2023, an elderly Ahmadi lawyer and his assistant were severely beaten by religious extremists at City Courts Karachi.<sup>43</sup> In 2024, two Ahmadis were killed in Saad Ullah Pur on July 8, and the President of the Ahmadiyya community in Bahawalpur was killed on March 4.<sup>44</sup>

22. Ahmadis in Pakistan do not even have the fortune of resting in peace. In 2023 alone, 109 Ahmadi gravestones were desecrated<sup>45</sup>, and 17 similar incidents have been documented so far in 2024.<sup>46</sup> In June 2021, a violent mob obstructed the funeral procession of an Ahmadi woman in a local graveyard of Sheikhpura District, forcing the family to bury their deceased elsewhere.<sup>47</sup> In July 2022, under police supervision, 53 Ahmadiyya graves were desecrated in Gujranwala District, Punjab Province.<sup>48</sup>
23. Perpetrators of deadly attacks on Ahmadi Muslims are rarely arrested or charged for their crimes, and in some cases, are allowed to act with impunity, even receiving legal sanctuary and safe havens. Police at the provincial and local levels routinely fail to provide adequate protection for vulnerable Ahmadi Muslims, despite receiving warnings of imminent threats. In many instances, police are complicit in the persecution, torture, and murder of Ahmadi Muslims.<sup>49</sup>

### C. Legal Restrictions on Freedom of Expression of Ahmadi Muslims (ICCPR Art. 19)

24. Since the last review, Pakistan's legal restrictions against Ahmadis have expanded further into the online and social media sphere, even extending their impact beyond national borders.
25. Recently, the Prevention of Electronic Crimes Act (PECA) and Removal and Blocking of Unlawful Online Content Rule 2020 have increasingly been used to target Ahmadis for their social media activity and censoring online content.<sup>50</sup>
26. Since 2008, the Pakistan Telecommunication Authority's ("PTA") has repeatedly banned Ahmadi online content inside Pakistan but in the last few years the agency has expanded its efforts to block or remove online content, targeting websites hosted in countries such as the U.S., U.K., Australia, Singapore, and Switzerland.<sup>51</sup> The PTA has blocked approximately 20 foreign websites of the Ahmadiyya Muslim Community which are affiliated with the worldwide community and properly registered in their respective countries.<sup>52</sup>
27. On December 24, 2020, the PTA sent a legal notice to two Ahmadi U.S. citizens. The Notice required the two Americans to remove all content from the [www.trueislam.com](http://www.trueislam.com) website within a mere 24 hours of receipt of the Notice as it violated Pakistan's blasphemy laws. The PTA also threatened penalties under Pakistan's Prevention of Electronic Crimes Act 2016 and the Removal and Blocking of Unlawful Online Content Rule 2020, which include harsh criminal sanctions and fines of up to 500 million rupees (\$3.1M USD).<sup>53</sup>

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<sup>43</sup> Khan, *supra*, note xvii, at 4.

<sup>44</sup> OHCHR, *supra*, note vi.

<sup>45</sup> International Human Rights Desk, *supra*, note xiv.

<sup>46</sup> Amnesty International, *supra*, note x.

<sup>47</sup> *Id.*

<sup>48</sup> U.S. Comm'n on Int'l Religious Freedom, *2023 Annual Report* 34 (2023), <https://www.uscirtf.gov/sites/default/files/2024-01/AR%202023.pdf>.

<sup>49</sup> Khan, *supra*, note xvii, at 8.

<sup>50</sup> *Five Years of PECA: The Law That Tried to Silence Pakistan*, IFEX (Feb. 28, 2022), <https://ifex.org/five-years-of-peca-the-law-that-tried-to-silence-pakistan/>; Digital Persecution of Ahmadi Muslims in Pakistan, Stop the Persecution (June 2022), <https://stopthepersécution.org/wp-content/uploads/2024/01/Digital-Persecution-of-Ahmadi-Muslims-in-Pakistan-June-2022.pdf>.

<sup>51</sup> Tabinda Kokab, *Pakistan Extends Its Censorship to International Ahmadi Content*, Religion Unplugged (May 5, 2023), <https://religionunplugged.com/news/2023/5/5/pakistan-encroaches-on-international-ahmadi-content>.

<sup>52</sup> Khan, *supra*, note xvii, at 7.

<sup>53</sup> OHCHR Report on Disinformation; AMLA Submission (2021). Available at <https://www.ohchr.org/sites/default/files/Documents/Issues/Expression/disinformation/2-Civil-society-organisations/Ahmadiyya-Muslim-Lawyers-Association.pdf>. See also *Pakistan: Persecution of Ahmadis Must End as Authorities Attempt Shutdown of US website*. (2021, February 3). Amnesty International, available at



28. This came at the heel of the Pakistan Telecommunication Authority (“PTA”) issuing takedown notices to Google and Wikipedia to remove content associated with the Ahmadiyya Muslim Community. The PTA, citing The Removal and Blocking of Unlawful Online Content Rules 2020 (“Unlawful Online Content Rules”), required Wikipedia to remove articles portraying the head of the Ahmadiyya Muslim Community, Mirza Masroor Ahmad, as a Muslim. The PTA also required Google to remove a Google play app published by the Ahmadiyya Muslim Community, which provides Arabic and English translations of the Qur’an. Google has succumbed to this pressure and has removed all apps owned by the Ahmadiyya Muslim Community from its Google play app. The PTA has now banned over 20 websites of the Community—a clear overreach and yet another means to censor the minority community in violation of ICCPR Art. 18 & 19.<sup>54</sup>
29. In the same vein, Pakistan’s blasphemy laws are now being used to target high level leadership of the AMC. In May of 2020, Rohan Ahmad, an Ahmadiyya Missionary, was arrested on the accusation that he possessed Ahmadiyya literature. He was charged under 298-C and 295-B, PPC & 11 of Electronic Crimes Act.<sup>55</sup>
30. On January 16, 2022, the Lahore High Court denied bail to three Ahmadis who were arrested in 2019 on charges under the Penal Code and PECA for allegedly sharing an “unauthorized” translation of the Holy Quran in a WhatsApp group. While one of them was later granted bail by the Supreme Court on April 27, 2022 two of them remain in jail awaiting trial at the end of the year.<sup>56</sup>

**D. Effectively Disenfranchised: Separate Electoral List for Ahmadi Muslims (ICCPR Art. 25)**

31. Ahmadis are denied the right to vote in local, provincial and national elections freely and fairly. In the 2017 concluding observations, the HRC specifically showed concern over “the removal of Ahmadis from the general electoral list and their registration on a separate voting list...” and called on the state party to “improve the election system and procedures with a view to ensuring that all voters are included on electoral lists and that all citizens can exercise their right to vote without obstacles.”<sup>57</sup>
32. Prior to 1978—when President Zia-ul-Haq declared his intent to abolish the joint-electorate system—all Pakistani citizens had an equal vote irrespective of faith.
33. In 1985, General Zia split the electorate so non-Muslims would have to register on separate “non-Muslim” electoral rolls.<sup>58</sup> Non-Muslim minorities could only vote for non-Muslim candidates, comprising only 5 percent of the National Assembly seats. To vote, Ahmadi Muslims were forced to register on “non-Muslim” electoral rolls, something that their conscience would not permit.
34. On February 27, 2002, President Musharraf issued an executive order—EO No. 7—that abolished Pakistan’s separate electorate system, restoring the joint-electorate that existed before General Zia.<sup>59</sup>
35. However, shortly thereafter, relenting to extremist pressure, President Musharraf issued a new Executive Order No. 15, amending EO No. 7 and providing that while “elections for the members of the National Assembly and the Provincial Assemblies shall be held on the basis of joint electorate”, the “*Status of Ahmadis [was] to remain unchanged.*”<sup>60</sup>

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[https://www.amnesty.org/en/latest/press-release/2021/02/pakistan-persecution-of-ahmadis-must-end-as-authorities-attempt-shutdown-of-us-website/#:~:text=The%20Pakistani%20authorities%20must%20end,Authority%20\(PTA\)%20to%20shut%20down](https://www.amnesty.org/en/latest/press-release/2021/02/pakistan-persecution-of-ahmadis-must-end-as-authorities-attempt-shutdown-of-us-website/#:~:text=The%20Pakistani%20authorities%20must%20end,Authority%20(PTA)%20to%20shut%20down) ; Quinn, J. (2021, February 2). *Pakistan’s Disturbing Digital Threat to Americans*. National Review. Available at <https://www.nationalreview.com/2021/02/pakistans-disturbing-digital-threat-to-americans/>

<sup>54</sup> *Id.*

<sup>55</sup> *Id.*

<sup>56</sup> U.S. Dep’t of State, 2022 Report on International Religious Freedom: Pakistan (2022),

<https://www.state.gov/reports/2022-report-on-international-religious-freedom/pakistan/>.

<sup>57</sup> HRC, *supra*, note vii, at 9.

<sup>58</sup> President’s Order 14 Of 1985 Revival Of The Constitution Of 1973 Order, 1985 [Gazette of Pakistan, Extraordinary, Part-1, 2nd March 1985] No. F 17(3)/85-Pub., available at [http://www.pakistani.org/pakistan/constitution/orders/po14\\_1985.html](http://www.pakistani.org/pakistan/constitution/orders/po14_1985.html).

<sup>59</sup> Conduct of General Elections Order No. 7 of 2002, available at <https://ecp.gov.pk/chief-executives-order-no7-of-2002>.

<sup>60</sup> *Id.*

36. Under EO No. 15, all citizens, except Ahmadis, were moved to the main electoral list leaving only Ahmadis on the non-Muslim list.<sup>61</sup> Currently, the list serves no practical purpose as all citizens, irrespective of faith, vote for the same general seats in the National and Provincial Assemblies. Therefore, this list is nothing more than a symbolic reaffirmation of the non-Muslim status given to Ahmadis.
37. EO No. 15, and its discriminatory provisions, were also made a part of the Election Act 2017 through Election (Amendment) Act, 2017 whereby Ahmadis were again added to a supplementary list of voters.
38. However, for Ahmadis living in Pakistan, such a list—with contact information of registered Ahmadi voters—has very real and dangerous consequences, as it could be used by extremists to target them.
39. Therefore, while all other Pakistanis vote under a joint electoral list, Ahmadis are the *only* section of the populace that are effectively deprived of the right to vote, in clear violation of Article 25 of the ICCPR.
40. Furthermore, the voter registration forms are blatantly discriminatory toward Ahmadis. All new voters must complete Form A, which requires a faith declaration. “Muslim” and “Qadiani/Ahmadi” are distinct options, clearly implying that Ahmadis are non-Muslim. Moreover, even if Ahmadis were to check the box as “Muslim,” they must affirm under oath that they denounce the founder of AMC. Due to this systematic discrimination, Ahmadis did not vote in the last federal, provincial, or local elections, and unless serious reform is made, Ahmadis cannot vote in the next general elections either.

#### **E. Passport and National Identity Card Declaration (ICCPR Articles 12 and 20)**

41. Pakistan requires every citizen applying for a passport to declare his/her faith. If a person wishes to declare himself or herself Muslim, he/she must sign a declaration titled “Declaration in the Case of Muslims:”<sup>62</sup> That declaration provides, in relevant part, that “*I consider Mirza Ghulam Ahmad Qadiani to be an imposter nabi and also consider his followers . . . to be Non-Muslim.*”<sup>63</sup> Pakistanis who wish to obtain a National Identity Card are required to make a similar declaration.<sup>64</sup> The passport declaration prevents Ahmadi Muslims from performing Hajj, a basic pillar of their faith. This declaration forces Ahmadis to renounce their identity as Muslims in order to obtain basic travel documents. Equally troubling, the declaration advocates religious hatred that constitutes incitement to discrimination and hostility against Ahmadis.
42. The Passport and National Identity Card declarations are in clear violation of the right to liberty of movement, guaranteed in Article 12. They also effectively advocate religious hatred in violation of Article 20.

#### **F. Police Torture of Ahmadi Muslims (Article 7 & UNCAT)**

43. On February 10, 2012, police authorities in Rabwah took Master Abdul Qudoos Ahmad, an Ahmadi schoolteacher, into custody in connection with a murder investigation for which he was kept in illegal detention by the police for 35 days where he was tortured severely. He died shortly after release succumbing to his wounds.<sup>65</sup> Since 2012, there is no evidence that an investigation into the death was conducted and anyone was held responsible.

<sup>61</sup> “Minorities Under Attack: Faith-based Discrimination and Violence in Pakistan,” Human Rights Commission of Pakistan. available at: [https://www.fidh.org/IMG/pdf/20150224\\_pakistan\\_religious\\_minorities\\_report\\_en\\_web.pdf](https://www.fidh.org/IMG/pdf/20150224_pakistan_religious_minorities_report_en_web.pdf)

<sup>62</sup> Application Form for Passport, available at [https://pakconsulatela.org/wp-content/uploads/2016/05/Passport\\_Renewal\\_Form\\_A.pdf](https://pakconsulatela.org/wp-content/uploads/2016/05/Passport_Renewal_Form_A.pdf).

<sup>63</sup> *Id.*

<sup>64</sup> Asian Human Rights Comm’n, *Pakistan: More Muslim than the Muslim* (Mar. 2, 2012), available at <http://www.humanrights.asia/news/ahrc-news/AHRC-ART-017-2012>.

<sup>65</sup> Asian Human Rights Comm’n, “PAKISTAN: In a hate campaign against the Ahmadis, police tortured to death an innocent school teacher (April 3, 2012), available at <http://www.humanrights.asia/news/urgent-appeals/AHRC-UAC-057-2012>.

44. On December 5, 2016, during the raid of AMC offices, police arrested and beat several Ahmadis, including a foreman and some Ahmadi imams.<sup>66</sup> Those who were arrested were severely tortured by local police.<sup>67</sup> One victim, Sabah ul Zafar, provided a first hand account of the torture he suffered. He was imprisoned with four inmates in a 10ft cell, infested with rats and subjected to torture.<sup>68</sup>
45. The conduct of police authorities to date is in clear violation of Pakistan's obligations under Article 7 of the ICCPR and UNCAT.

### G. Discrimination on the Basis of Religion (Article 26)

46. Ahmadis in Pakistan experience widespread discrimination in education and employment. Despite their historically high literacy rates, Ahmadis are targeted by clerics and extremist groups, leading to exclusion from government positions, harassment in business, and denial of educational opportunities.
47. Two Ahmadi students, Mr. Hassan Nawaz Khan and his sister from Rambra, District Narowal, attended Aspire College Shakar Garh. When their Ahmadiyya religious identity was discovered, it became an issue among the other students. On September 21, 2023, Mr. Hassan was attacked and assaulted by fellow students. The principal sent him home before the college closed for the day and advised them not to return to avoid further harm.<sup>69</sup>
48. In 2023, the District Bar Association of Gujranwala and Khyber Pakhtunkhwa Bar Council issued notices requiring that individuals seeking to be admitted to the Bar of Pakistan must positively assert that they are Muslim and denounce the teachings of the Ahmadiyya Muslim Community and specifically its founder, Mirza Ghulam Ahmad.<sup>70</sup>
49. The state fails to protect Ahmadis from prevalent discrimination in the education, employment and professional fields in violation of its obligations under Article 26.

## III. RECOMMENDATIONS TO PAKISTAN GOVERNMENT

1. **Amend the Constitution and Penal Code:** Remove provisions in the Constitution and Pakistan's Penal Code (PPC) that specifically target and discriminate against Ahmadis and impinge on their freedom of religion or belief.
2. **Abolish Separate Electorate:** Repeal Section 48A of the Elections Act of 2017 and permit Ahmadi Muslims to vote alongside all other citizens of Pakistan as a part of a joint electorate.
3. **Ensure Freedom of Expression for Online Activity:** Cease the use of PECA and other regulatory laws that target the online activity of Ahmadis and censor online content/websites. The Pakistan Telecommunication Authority (PTA) should end its censorship of Ahmadi content and websites, both those that are hosted domestically and internationally.
4. **Remove Passport and National Identity Declarations:** Remove the mandatory declarations of faith required for obtaining passports and national identity cards that force citizens to denounce Ahmadi beliefs.
5. **End Impunity for Violence and Incitement:** Implement rigorous investigations and prosecutions of perpetrators who incite or engage in violence against Ahmadis and ensure police protect Ahmadis from

<sup>66</sup> *A Report on the Persecution of Ahmadis in Pakistan during the Year 2016*, *supra* note xiiat 1.

<sup>67</sup> Ahmadiyya Foreign Missions Office, *Update On The Unlawful Horrific CTD Raid on Ahmadiyya Office and Zia ul Islam Press* (Dec. 9, 2015), <https://www.persecutionofahmadis.org/wp-content/uploads/2016/12/Raid-Tehreek-e-Jadeed-Flash-Report-Followup.pdf>.

<sup>68</sup> *Suffocation of the Faithful, the Persecution of Ahmadi Muslims in Pakistan and the rise of international extremism* (July, 2020) Available at: <https://www.ohchr.org/sites/default/files/Documents/Issues/Religion/Islamophobia-AntiMuslim/Civil%20Society%20or%20Individuals/APPGAhmadiyyaMuslim-2.pdf> (Accessed: 12 September 2024).

<sup>69</sup> Khan, *supra*, note xvii, at 4.

<sup>70</sup> Canadian Bar Association, *Re: Discrimination against Ahmadi Muslim Lawyers in Pakistan*, (Sept.6 2023), available at <https://www.cba.org/CMSPages/GetFile.aspx?guid=5f096b7d-d52c-4186-adf0-11059be575ab>.

persecution. Authorities must be held accountable for failing to protect Ahmadis, and police should be mandated to actively protect the community from persecution and religious hate crimes.

6. **Protect Ahmadi Religious Sites:** Implement and enforce laws that protect Ahmadi mosques, graves, and other religious heritage sites from attacks and desecration. The government should ensure that court orders protecting these sites are implemented and that any violations are promptly addressed.

#### IV. CONCLUSION

Pakistan remains in fundamental breach of its international obligations, particularly under the ICCPR. The ongoing persecution of Ahmadi Muslims, including the denial of their religious freedoms, disenfranchisement, and systematic discrimination, is a clear violation of their basic human rights. The involvement of extremist groups like *Tehreek-e-Labaik Pakistan* (TLP) in attacking Ahmadi mosques, desecrating graves, and preventing ritual sacrifices, combined with state complicity in this persecution, reflects a deeply entrenched regime of religio-political apartheid. The international community must continue to press Pakistan to take meaningful actions to end this persecution and protect the rights of Ahmadi Muslims. Without such efforts, the systemic injustices faced by this vulnerable community will persist, undermining Pakistan's commitments to human rights and international law.

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