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Keywords: Climate Governance, Institutional Fragmentation, Policy Coherence, Sustainable Development, Development Planning, Pakistan, Eighteenth Amendment

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Climate Politics, Institutional Fragmentation, and Development Planning in Pakistan: Assessing Policy Coherence for Sustainable Development



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Abstract

Despite contributing less than 1% to global emissions, Pakistan is among the most vulnerable countries affected by climate change. While the country has developed several climate policy instruments, such as the NCCP, Pakistan Climate Change Act, National Adaptation Plan, and NDCs, climate goals have not yet been incorporated into development processes, budgeting, infrastructure development, and institutions. In this regard, this study assesses PCSD in Pakistan through a qualitative analysis of six major climate policy instruments through a thematic review of the documents. Considering horizontal, vertical, temporal, and external coherence, the results demonstrate institutional fragmentation and a lack of effective coordination at different levels of governance. The Eighteenth Constitutional Amendment worsened governance challenges by transferring powers to unequipped provincial authorities. The 2022 flooding in Pakistan was the consequence of the ineffective governance structure. Thus, the results show the importance of enhancing climate governance with policy integration, institutional coordination, and building capacity.

Keywords: *Climate Governance, Institutional Fragmentation, Policy Coherence, Sustainable Development, Development Planning, Pakistan, Eighteenth Amendment*

Introduction

Climate change has emerged as a major challenge in terms of governance and development for developing nations plagued by institutional challenges, population growth, and economies that rely on climate. The case of Pakistan is one example where, despite being responsible for under one percent of the world's carbon dioxide emissions, the country ranks amongst those that are at the greatest risk from the effects of climate change. The devastating monsoon floods of 2022, whereby close to one third of the country was submerged, causing around 33 million individuals to be displaced and resulting in economic losses of more than thirty billion dollars, highlighted more than just environmental challenges (UNOCHA, 2022). What was evident in the extent of damage done was not just the impact of climate change but also how the nation's



governance failed in dealing with its effects due to a lack of consideration in infrastructure development and planning processes.

In the last ten years, the country has managed to create a robust set of climate policies including Pakistan's Climate Change Act (2017), Revised National Climate Change Policy (2021), Nationally Determined Contributions Update (2021), National Adaptation Plan (2023), as well as other province-level climate policies. Although the creation of the above policies is commendable, the commitment has not been reflected in their implementation. The Ministry of Climate Change lacks the power required to oversee the decisions made by the sectoral ministries that directly affect the issue at hand, whereas the Climate Change Council formed under the 2017 Act has failed to be activated. Moreover, in the wake of devolving environmental powers under the 18th Constitutional Amendment, the environmental bodies in provinces continue to struggle due to limited resources and capabilities. Thus, the institutional framework for managing the problem of climate change in Pakistan could be described as one where there is layering without integration.

PCSD, or Policy Coherence for Sustainable Development, is an appropriate tool for analyzing this governance problem. The main principle of PCSD is the coherence of policies among sectors, governance levels, and political cycles, which ensures that policies for development do not contradict but rather complement policies for sustainability (OECD, 2020). Nevertheless, in Pakistan, climate governance faces institutional disconnects. The first category of disconnect is that among the climate, planning, energy, agriculture, and disaster management sectors. Similarly, disconnects exist vertically between national policies and provincial implementations.

Within this context, this article seeks to explore the integration of climate concerns within Pakistan's development planning policy framework and how institutional fragmentation results in poor policy coherence and climate resilient development. In doing so, using the Policy Coherence for Sustainable Development theory, Institutional Fragmentation theory, and Polycentric Governance theory, this research explores the linkages between the three mentioned policies. Specific focus is placed on how political economy plays a role in undermining climate concerns and creating a preference for development and politics over climate issues as highlighted by the 2022 flooding crisis.

The paper addresses three connected scholarly questions. First, the paper provides knowledge about the political economy of climate governance in developing countries as it discusses what makes policy failures possible even when policies become more advanced over time. Second, the paper raises issues related to the impact of the decentralization of governance and federal-provincial politics on environmental policy implementation. Finally, the paper is one of the contributions to the literature on climate resilient development planning by exploring what needs to be done to ensure policy coherence in this context. Although the case considered is specific to Pakistan, the lessons learned may be useful for other climate change vulnerable countries facing the same challenges. Ultimately, the paper demonstrates that climate resilience is not only a question of developing policies but also building an integrated governance system that will link climate policies with national development strategies.

Literature Review

Climate Politics and Governance

The move toward political economy approaches within climate governance is the most defining shift in recent years. While earlier work conceptualized climate governance as an institutional process and one of cooperation, new scholarship focuses on conflicts, power relations, and the rationality of non-compliance (Aklin & Mildenberger, 2020; Cipler et al., 2022). For analysis in

developing countries, this means that if failure results from political economy factors rather than lack of capability, then capacity building and institutional change become crucial yet not sufficient steps towards success.

International climate agreements including the Paris Accord, according to Falkner (2021), are comprised of negotiated interests rather than ideal governance. The logic behind that holds true for polycentric domestic governance structures too: Jordan et al. (2022) explain how the former might distribute adaptive capacity efficiently and how the latter can produce coordination challenges impossible to fix by any individual actor. Bernstein (2020) further expands this analysis by incorporating legitimacy into consideration: a part of institutional efficiency depends on whether affected communities recognize their responsiveness. Indeed, such a legitimacy issue exists in Pakistan, where sub-national groups face greater effects of climate risks while central institutions make all decisions about policy and funding (Newell et al., 2021).

Policy Coherence for Sustainable Development

Nilsson et al. (2020) define PCSD differently – as the proactive management of synergies and trade-offs among interdependent policies instead of merely the avoidance of contradictions. With the change in definition, attention will be shifted from whether climate policy was discussed in planning documents (it usually is) to whether there are governance systems for managing trade-offs between climate policy and economic growth when they conflict. Unfortunately, the empirical evidence in relation to developing countries looks bleak; according to Biermann et al. (2022), the formal adoption of SDGs has not led to the inclusion of climate and development objectives in the budget planning process; climate-development trade-offs have been prioritized in favor of growth and employment needs (Sachs et al., 2021). Tosun and Leininger (2017) explain why such an outcome was to be expected, as climate objectives do not enjoy the same political clout that growth and employment objectives do.

Institutional Fragmentation Theory

The differentiation made by Feiock (2013) between structural fragmentation – which involves dispersion of institutional authority, and outcome fragmentation - which results from coordination failure and implementation deficit, is analytically important. It is the level of coordination rather than the multiplicity of institutions that matters. This is where the relevance of Biermann et al's (2009) idea of 'architecture of complexity' in International Environmental Governance can be extended into Pakistan's national framework, characterized by multiple stakeholders, overlapping jurisdiction, disparity in capabilities, and lack of hierarchical body to settle disputes between institutions.

Climate Governance in Developing Countries

Alam et al. (2021) mention three trends in climate-vulnerable developing nations that apply to Pakistan, namely that the use of project interventions replaces integration; donor funding misrepresents national policy priorities; and community-level knowledge of climate change adaptation is sidelined in the NDC approach. South Asia provides pertinent examples. In terms of Bangladesh's incorporation of climate change adaptation into its eighth five-year plan and institutionalization of the Climate Change Trust Fund, Haque et al. (2022) illustrate that resource-strapped states are capable of integrating climate action with development where there is political will. The case of India's State Action Plans on Climate Change is illustrative of both the strengths and weaknesses of federal coordination structures (Dubash, 2021). As Mayer (2023) highlights, isomorphic structures created by multilateral climate change funding requirements rarely integrate domestic needs of governance.

Climate-Development Nexus in Pakistan

The disjunction between the prioritization of NDC adaptation actions and corresponding budget allocations reveals the lack of an institutional linkage between international commitments and domestic fiscal planning mechanisms. The fragmented governance within the water sector among the institutions such as IRSA, the provincial irrigation authorities, WAPDA, and water associations is revealed by Mustafa et al. (2021), where governance failure undermines climate-adaptive water resource management. The politically entrenched coalition of interests of landowners, energy subsidies, and short-term electoral calculations by politicians identified by Husain (2022) continues to prioritize politics over climate concerns within the legislative and fiscal realms. Raza et al. (2023) highlight the shortcomings in enforcement of provincial environmental regulations due to political interference, not technical incompetence.

Research Gap

There are three distinctions between this research and previous literature on Pakistan. Firstly, previous studies focus on individual instruments or industries and fail to analyze the governance architecture which includes the interaction among institutions and coordination dynamics in order to determine whether or not there is coherence within the implementation of certain instruments. Secondly, the theories of PCSD and institutional fragmentation have not been properly explored empirically regarding Pakistan. Thirdly, the 2022 floods in Pakistan have elicited policy discourse but not much theoretically sound academic research about governance.

Theoretical Framework

There are three analytical lenses through which we can undertake our analysis: being both structural (institutional fragmentation theory), normative (PCSD), and systemic (polycentric governance theory).

Policy Coherence for Sustainable Development

The PCSD approach is practical, meaning that it operationalizes what climate and development governance needs to do, rather than what it should aspire to (OECD, 2020; Nilsson et al., 2020). These four dimensions of coherence horizontal, vertical, temporal, and external make up the basis of our analysis (Table 1). Our analytical focus involves shifting the emphasis from what policies say onto what makes them coherent: not whether Pakistan's NDC refers to SDG 13, but whether the institutional design translates this reference into action.

Table 1

PCSD Dimensions: Definitions, Pakistani Applications, and Principal Obstacles

PCSD Dimension	Definition	Application in Pakistan	Principal Obstacles
Horizontal Coherence	Cross-sectoral alignment at the same governance tier	MoCC, Planning Commission, NDMA, sectoral ministries	Mandate overlap; no binding inter-ministerial mechanism
Vertical Coherence	National-subnational policy alignment	Federal-provincial integration after 18th Amendment	Devolution without commensurate capacity transfer

Temporal Coherence	Policy continuity across electoral cycles	Sustaining NCCP, NAP, NDC across governments	Political discontinuity; plan reversals; short-termism
External Coherence	Domestic-international commitment alignment	NDC consonance with NCCP, SDGs, Sendai Framework	Gap between international pledges and domestic implementation

Note: MoCC = Ministry of Climate Change; NCCP = National Climate Change Policy; NAP = National Adaptation Plan; NDC = Nationally Determined Contribution. *Source:* Authors, adapted from OECD (2020) and Nilsson et al. (2020).

Institutional Fragmentation Theory

Applied here following Biermann et al. (2009) and Feiock (2013), this framework maps climate governance authority distribution across Pakistan's federal and provincial institutions and assesses whether coordination mechanisms are adequate to prevent policy contradiction and implementation failure. The theory's central proposition that fragmentation's consequences depend on coordination quality, not the fact of fragmentation directs reform recommendations toward coordination architecture rather than institutional consolidation, which is neither feasible nor necessarily desirable in a federal system.

Polycentric Governance Theory

Ostrom's (1990) polycentric governance framework, extended to climate contexts by Jordan et al. (2022), provides the normative counterpoint: multi-actor, multi-level governance of complex problems is structurally inevitable; the question is how to organize it productively. Applied to Pakistan, this framework identifies institutional complementarity as the governance ideal and directs attention to the bridging mechanisms shared information systems, common sub-national planning standards, inter-ministerial coordination with real authority that enable productive polycentricity. These mechanisms are either absent or severely under-invested in Pakistan's current architecture.

Conceptual Framework

Policy coherence assessed across the four PCSD dimensions is treated as the product of interactions among five variables: institutional coordination, political commitment, climate governance capacity, development planning integration, and Pakistan's federal structural context. Sustainable development outcomes (adaptation progress, SDG achievement, disaster risk reduction) constitute the dependent variable.

Institutional coordination distinguishes formal from operationally effective mechanisms. Political commitment distinguishes performative commitment legislation, agreement signing from substantive commitment: funding implementation and tolerating enforcement against politically influential interests. Climate governance capacity attends particularly to the federal-provincial asymmetries that constitutional devolution has widened. Development planning integration assesses whether climate risk is embedded in PSDP appraisal and sectoral budgeting, or confined to stand-alone environmental instruments. Policy coherence itself is an intermediate variable and primary analytical outcome a spectrum from contradictory to fully integrated governance, against which Pakistan's architecture is assessed throughout.

Methodology

This study employs a qualitative policy analysis approach to examine the relationship between climate politics, institutional fragmentation, and development planning in Pakistan. Qualitative policy analysis is best suited for understanding the dynamics of governance, institutions, and interaction between policies related to the outcome of climate governance (Yanow & Schwartz-Shea, 2022). Pakistan is chosen to be a crucial case study owing to its vulnerability to climatic conditions, federal system of governance, and the problem of coordination of policies in the wake of the Eighteenth Constitutional Amendment (Yin, 2018). This case study is based on the policy tools involved, which include National Climate Change Policy (2012-revised 2021), Pakistan Climate Change Act (2017), National Adaptation Plan (2023), Vision 2025, Pakistan's Updated Nationally Determined Contribution (2021), National Disaster Management Policy (2013), and provincial climate policies. Some additional sources used in this analysis include parliamentarians' reports, post-disaster needs assessment of 2022, NDMA reports, budget documents at the federal level, as well as international organizations such as UNDP, the World Bank, ADB, and UNOCHA. The documents were analyzed with respect to six dimensions, namely policy goals, resource distribution processes, institutional duties, provisions for monitoring and evaluation, inter-policy coherence, and linkages with the SDGs. Data were analyzed using thematic analysis as described by Braun and Clarke (2022) and involved deductive coding based on policy coherence, institutional coordination, capacity of governance, and political commitment, together with inductive coding to capture new themes emerging around federal-provincial coordination, climate finance, and issues surrounding governance.

Findings

Climate Change Mainstreaming in Development Planning

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The problem with coherence is architectural, not rhetorical – there are no systems established for translating climate aspirations into planning practices. While the NCCP update explicitly calls for the integration of climate risks within the appraisal process of the PSDP, the appraisal system of the Planning Commission lacks any mandatory climate screenings and climate impact assessment preconditions for project approval.

With Vision 2025, the governance hierarchy is made quite transparent. Throughout the document's seventeen development pillars, not one single component relates to climate resilience; climate aspects are considered only in passing in agricultural and water matters. As a result, when the national development strategy downplays the significance of environmental sustainability while the NDC expresses ambitious goals concerning climate change adaptation and mitigation, the message sent to sectoral ministries is loud and clear. Bangladesh's Eighth Five-Year Plan which designates climate resilience as one of three overarching strategic objectives and requires ministerial demonstration of climate adaptation alignment in annual planning submissions (Haque et al., 2022) represents a different institutional choice. Pakistan has not made it.

Institutional Fragmentation and Governance Architecture

Climate governance authority is distributed across an institutional landscape with neither clear hierarchy nor effective coordination. Table 3 maps the principal actors, their mandates, and the coordination gaps that render those mandates collectively incoherent.

Table 2

Institutional Architecture of Climate Governance in Pakistan: Actors, Mandates, and Coordination Gaps

Institution	Level	Climate Mandate	Critical Coordination Gap
Ministry of Climate Change (MoCC)	Federal	National policy formulation; UNFCCC liaison	No enforcement authority over sectoral ministries
Planning Commission	Federal	National development planning; SDG coordination	Climate mainstreaming absent from PSDP appraisal
NDMA	Federal	Disaster risk management; emergency response	Siloed from long-term adaptation planning
Provincial EPAs	Provincial	Environmental regulation; provincial climate plans	Under-resourced; mandates unclear post-Amendment
PDMA	Provincial	Provincial DRM and flood management	Weak linkage with federal NAP and NCCP
Climate Change Council	Federal (statutory)	Inter-ministerial coordination under 2017 Act	Rarely convened; no secretariat; effectively dormant

Note: MoCC = Ministry of Climate Change; NDMA = National Disaster Management Authority; EPA = Environmental Protection Agency; PDMA = Provincial Disaster Management Authority. Source: Authors' analysis of official documents and organizational mandates.

The Climate Change Council statutory, Prime Minister-chaired, mandated by the 2017 Act to coordinate inter-ministerial climate action is the institution most consequentially absent from Pakistan's governance. It has no secretariat, has rarely convened, and its dispute-resolution mandate has never been operationalized. This pattern recurs: legislation creates an institution; the institution is not resourced or politically activated; governance continues as before (Husain, 2022). The Ministry of Climate Change meanwhile commands neither the budgetary weight nor the inter-ministerial authority to redirect the decisions of Energy, Agriculture, and Planning the ministries whose actions most determine climate outcomes. This is not a coordination failure. It is a governance architecture that structurally disadvantages climate.

Inter-Provincial Coordination Post Eighteenth Amendment

The Eighteenth Amendment to the constitution (2010) devolved environmental protection and land-use planning responsibilities to the provinces. The issue with governance is not that the authorities were devolved but rather that it was done prior to building up provincial institutional capabilities and coordination mechanisms between levels of government. Provinces now exercise climate-related powers in the absence of adequate resources and without proper coordination at the national level. KP (2016), Punjab (2017), and Sindh (2022) have developed their own provincial

climate plans but in an uncoordinated fashion and with poor alignment with the NCCP and SDGs. Balochistan province has failed to develop one, despite being the most vulnerable.

The disconnect becomes clearer when discussing climate finance. The international finance for addressing climate impacts goes to the federal government while implementation authority rests with provincial and local governments. This creates situations where each level finds plausible deniability to blame the other for accountability gaps. Pakistan's ambitious 2021 NDC set targets for adaptation at the sub-national level yet fails to identify the inter-governmental mechanism to achieve those targets.

Climate Politics and the Subordination of Climate Objectives

A political economy that systematically undermines climate considerations operates underneath the formal structure of commitments. The energy sector is a prime example. Pakistan undertook new investments in coal-based electricity production in CPEC despite NDCs and declining economic competitiveness of coal due to energy security concerns, vested interests, and dynamics of Chinese investments (Raza et al., 2023). Renewable energy projects were also included in CPEC, yet the package reflects a political compromise rather than a climate strategy. The same can be said about agriculture. Sugarcane and rice farming in water-scarce areas have persisted due to political power possessed by vested interests of the landowners. Technically and economically, climate adaptation is possible, yet politically feasible only through destabilization of the coalition supporting the status quo.

The successful framing of Pakistan as a country vulnerable to the climate crisis on the international stage has yielded many benefits, including large amounts of funding and creation of the Loss and Damage Fund. However, climate costs externalized abroad may undermine domestic reform incentives. At present, Pakistan lacks a clear strategy for international climate finance integration into the domestic context in part due to conflicts between different departments with jurisdiction over managing climate finance inflows.

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Policy Coherence and the Sustainable Development Goals

Climate action has been incorporated within Pakistan's SDG framework by aligning with SDG 13, but there have been failures of coherence between SDG 13 and those SDGs whose success climate change directly impacts: SDG 1, SDG 2, SDG 6, and SDG 11. The impact of climatic factors on agricultural production is both an SDG 2 and SDG 1 problem; the floods damage SDG 11-related infrastructure; melting glaciers pose an SDG 6 problem. There is no budgetary tool for monitoring these climate-based impacts across SDGs, and there is no governance approach to handle conflicts between SDG 8 (growth) and SDG 13 whenever they occur, something that is bound to happen in Pakistan's political economy context. According to Sachs et al., Pakistan lags behind other countries in the region regarding SDG composite indicators, particularly in the realm of environmental SDGs. The Voluntary National Review process produces cross-ministry data generation, though not sufficient to replace PSDP integration, SDG-green budgeting, and cross-ministry authority essential for SDG climate coherence.

Stress Test for Governance: The 2022 Floods

The 2022 floods did not cause Pakistan's fragmentation; rather, they highlighted it amid extreme stress. Table 4 captures the governance failures evident in the floods and their implications for coherence.

Table 3

2022 Pakistan Floods: Governance Failures and Policy Coherence Implications

Governance Dimension	Observed Failure	Policy Coherence Implication
Early Warning	Fragmented monitoring across PMD, NDMA, PDMAs; alerts delayed	No integrated multi-hazard early warning protocol
Federal-Provincial Response	Coordination breakdown between NDMA and PDMAs; resource deployment stalled	Vertical incoherence in disaster governance post-Amendment
Infrastructure Planning	Flood protection absent in high-risk zones	Climate risk excluded from PSDP appraisal
Humanitarian Response	Overlapping, duplicative relief operations across agencies	No pre-positioned national recovery framework
Recovery and Reconstruction	PDNA completed; funding dispersed and uncoordinated	Build-back-better principles absent from recovery architecture
International Finance	Donor pledges exceeded USD 10 billion; disbursement slow and fragmented	No national climate finance architecture to absorb and direct funds

Note: NDMA = National Disaster Management Authority; PDMA = Provincial Disaster Management Authority; PMD = Pakistan Meteorological Department; PDNA = Post-Disaster Needs Assessment. Source: Authors' analysis drawing on UNOCHA (2022), Government of Pakistan PDNA (2022), and Tarbela et al. (2023).

The costs of the infrastructure damage can be said to be the sum of the financial liability due to decades of PSDP investments made without the knowledge of being in high-risk climate zones. This is not the result of any natural disaster but rather the cost of an uncoordinated public policy. The framework for recovery after the devastation in Resilient Recovery, Rehabilitation, and Reconstruction (4RF), formulated after the disaster with international help, was a commendable attempt to address the situation in an emergency context but the need for such formulation shows lack of preparedness in the same manner as that of the emergency response.

Discussion

All six themes come together to form a consistent analysis: layering without integration. All efforts at institution-building in the form of a new Act, plan, NDC, and province-wide strategies do constitute real progress, but this progress builds up into a layering process that fails to produce the coordinated institutional structure necessary to overcome the limitations of each institution in isolation. Layering without integration does not happen by chance; it is the expected outcome of a system of governance where the politics of coordination have become adverse and where institutional building replaces performance.

Comparable governance trajectories are documented in Nigeria (Adeyemi & Okafor, 2022) and Indonesia (Koesoemadinata et al., 2023): legislative proliferation that does not translate into effectiveness, with federal-subnational coordination deficits playing structurally equivalent roles. These comparisons reinforce the proposition that coordination architecture not additional policy content or institutions is the binding constraint under advanced institutional fragmentation. Institutional fragmentation theory explains the structural conditions; PCSD theory measures the

normative gap between international commitments and governance delivery; polycentric governance theory identifies the bridging mechanisms inter-ministerial bodies with real authority, shared information systems, common sub-national planning standards that would enable productive polycentricity from existing multiplicity.

The political economy dimension resists technocratic resolution. Pakistan's pattern of institutional creation without operationalization reflects rational calculation: climate governance generates electoral costs (enforcement against landowning interests, energy subsidy reform, land-use restrictions) while distributing benefits diffusely across long time horizons. Governance reform thus requires changes in the coalition of interests that benefits from incoherence, not only changes in institutional design. The 2022 floods shifted this political context by making the material costs of incoherence visible at national scale. Whether that shift is sustained long enough to drive structural reform is the central uncertainty and the window around which the recommendations below are designed.

Policy Recommendations

Seven reform areas are identified. Table 5 contains the summary matrix; the analysis below will focus on the four most structurally significant.

The first step to implementing reform would be the establishment of the Climate Change Council. It is not that there is no statutory framework for its existence, but rather that it remains politically dormant. Chasek et al. (2021) demonstrate that inter-ministerial coordination bodies are effective only when they carry credible executive-centre authority. A Council that the Prime Minister chairs perfunctorily is less useful than a well-resourced inter-ministerial climate working group chaired seriously at deputy PM level.

Table 5

Policy Recommendations for Climate Governance and Policy Coherence in Pakistan

Reform Area	Proposed Action	Lead Actor	Timeframe
Coordination Architecture	Activate Climate Change Council with secretariat and binding schedule; establish inter-ministerial climate working groups	PMO / MoCC	Short-term (1–2 yr)
Planning Mainstreaming	Mandate climate risk screening for all PSDP projects; ring-fence climate adaptation budget lines	Planning Commission / MoCC	Short-term
Vertical Coordination	Expand CCI mandate to include climate governance; establish joint federal-provincial implementation units	Federal + Provincial Govts	Medium-term (2–4 yr)
Climate Finance	Establish National Climate Finance Authority; implement green budget tagging; build capacity to access Loss and Damage Fund	Ministry of Finance / MoCC	Medium-term

Reform Area	Proposed Action	Lead Actor	Timeframe
Provincial Capacity	Resource provincial EPAs and climate units; develop sub-national climate data systems; redirect development partner support provincially	Provincial Govts / Donors	Medium-term
Disaster Governance	Embed Sendai Framework targets in NDMA/PDMA plans; legislate build-back-better reconstruction standards	NDMA / PDMA / MoCC	Short-medium-term
Legislative Reform	Strengthen enforcement provisions in Climate Change Act 2017; enact provincial climate legislation in all four provinces	Parliament / Provincial Assemblies	Long-term (4+ yr)

Note: MoCC = Ministry of Climate Change; NDMA = National Disaster Management Authority; PDMA = Provincial Disaster Management Authority; PSDP = Public Sector Development Programme; CCI = Council of Common Interests; PMO = Prime Minister's Office. Source: Authors.

Mandatory climate risk screening in PSDP appraisal is the most direct route to breaking the mainstreaming deficit at its source. The PSDP is where development planning becomes fiscal reality; embedding climate criteria at appraisal would systematically exclude climate-maladaptive investments. Bangladesh's climate-proofing of public investment appraisal and the Philippines' Regional Physical Framework Planning guidelines provide implementation models that require adaptation, not invention (Haque et al., 2022). Climate adaptation budget lines should be ring-fenced against fiscal consolidation compression, precisely the periods when resilience investment is most politically vulnerable.

Federal-provincial coordination requires constitutional and administrative innovation simultaneously. The Council of Common Interests should be expanded to include standing climate governance agenda items creating a constitutional basis for vertical coordination currently absent. Federal-provincial implementation teams, using the example of India's State Action Plans framework but with more effective authority vested in the federal government, would ensure that climate goals were achieved through province-level programs via joint planning and reporting processes instead of competing bureaucratic tracks.

The establishment of a National Climate Finance Authority, with multi-ministerial oversight and the task of coordinating international funding with domestic implementation, would overcome the problem of accountability caused by the present inconsistency between finance at the federal level and implementation at the provincial level. Green budgeting, which is possible within resource-constrained administrations, would ensure that spending on climate issues could be accounted for in the entire budget and hence hold ministers accountable for their implementation. Technical assistance provided by development partners needs to be directed towards provincial governments, where the implementation challenge is greatest.

Conclusion

It's not a case of poor policy design. The NCCP, Climate Change Act, NAP, and new NDC demonstrate clear governance commitment. It is rather an architecture challenge: the set of institutional relations, governance dynamics, and political economy that decides whether such

governance commitments will be realized in practice or remain aspirations. It is the former in Pakistan's case.

There are three structural drivers of Pakistan's current situation. First, the Ministry of Climate Change does not have the power to dictate decisions in sectoral ministries that matter most for the climate – a power imbalance that can only be changed through institutional reform and not additional legislation. Second, federal-provincial fragmentation emerged as a consequence of the Eighteenth Amendment but was not foreseen in its design. This sequencing problem became clear after the floods of 2022. Finally, there is the political economy of climate governance, which creates rational inertia: international obligations and commitment through policy adoption but no investment in the implementation of the policies due to cost implication for politically powerful entities.

The 2022 floods serve here as a source of evidence, not just of calamity. The US\$30 billion in losses and the failure to coordinate among the federal government and the provinces show us how governance incoherence costs in reality when faced with hazards of adequate magnitude. They reveal the concrete implications of a policy system which made invisible the costs associated with seeing climate governance as a compliance effort: namely, fiscal and human liabilities that build up over decades until such events as those of 2022 occur.

The contribution to theory comes in three parts: first, the demonstration that the pairing of institutional fragmentation with PCSD and polycentric governance is useful for climate governance analysis in developing countries; second, the provision of a politically economic explanation for why incoherence persists despite formal commitment; third, the establishment of Pakistan as an important case study in which dynamics of governance of devolution without coordination, institution-building without implementation become apparent and theoretically meaningful within climate-vulnerable federal developing countries. The opportunities opened by the 2022 floods are tangible, but historically limited. How they should be taken advantage of is the article's contribution. Whether they will be is another matter.

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