IRADA   IMS

BIG TECH IN
PAKISTAN

SITUATION REPORT

BIG TECH IN PAKISTAN

CREDITS

ACKNOWLEDGEMENT

TABLE OF CONTENTS

EXECUTIVE SUMMARY

This policy brief explains the presence, mandates and initiatives of social media companies operating in Pakistan, with a focus on Google, Meta, X and TikTok.

The purpose of the brief stemmed from the fact that despite being home to one of the 10 largest Internet communities and social media user bases, none of these companies maintain a physical presence in Pakistan. This also means that meaningful engagements between the Big Tech companies and other stakeholders might be rare.

The brief explores why the government has legislation in place to require companies to register and set up offices in Pakistan and why the companies do not comply with this requirement. It also explores the history of how these platforms have operated in Pakistan including facing several bans over the years.

It then discusses the three ways the tech companies stay active in Pakistan: ensuring compliance with official content removal and data requests under local laws, active relationship building with policymakers and community engagement. The brief explores why these three methods are effectively leading to the consumers being disenfranchised by the Big Tech companies, through what may seem as collusion between companies and government.

The document concludes by discussing some of the major questions raised by the exploration of how social media companies maintain a presence in Pakistan and recommendations to improve transparency and accountability in the tech companies' dealings with the government.

INTRODUCTION

Pakistan is home to the tenth largest population of Internet users in the world, with 135 million people being connected online by the end of 2024.[1] Internet penetration is continuing at a rapid pace, and smartphone access is also growing. This has been the result of successive governments emphasising the need for the country to go digital. And while such plans might need scrutiny about the sincerity of objectives, forward progress has been undeniable.

A key element of the growth of the Internet in the country also has to do with new arenas for the exchange of information. When categorised by number of social media users, Pakistan's rank rises to number six in the world, with 72 million people online.[2] The impact of social media has gone beyond just social connectivity and has provided a new space for news dissemination and political discourse.

The country's constitution also recognises the right to freedom of expression as a 'fundamental right' afforded to all citizens. The same status is also afforded to the right to access information.

The cumulative effect of rapidly increasing Internet use, coupled with the constitutional rights should ideally be unencumbered exercise of online freedom of expression and unrestricted online access to information.

But it is not. Pakistan, according to the Freedom on the Net report, is 'not free'.

The roots of good legislation and governance lie in participation and consensus. In the case of freedom of expression on the internet, civil society participation in policy deliberations faces significant barriers due to the government's unwillingness to engage with them. The involvement and mandates of social media companies in this process remain vastly underexplored.

This policy brief began with a need to understand how social media companies maintain a presence in Pakistan, what mandates they pursue and what initiatives they carry out in the country. It seeks to explore why multi-stakeholder consensus on how digital spaces should be governed remains elusive and how decisions affecting the rights of citizens to access information and express themselves are made.

This brief focuses on four major platforms to examine these issues: Google (including YouTube), Meta (which owns Facebook, WhatsApp and Instagram), X (formerly Twitter) and TikTok. All of these platforms qualify as a 'Significant Social Media Company' under Pakistan's laws,[3] as they have more than the 500,000 active users.

The brief tries to identify the reasons behind the current status of operations of the tech companies and find out why these companies do not have a physical presence in Pakistan despite millions of domestic users on their platforms. It looks into the concerns these companies have about the local environment, which range from business practices to legal apprehension. It also looks into how policymakers view the *modus operandi* of these companies.

---

[1] Pakistan Digital Transformation Report 2024 – Freedom Network
[2] ibid
[3] Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards) Rules 2021, Clause 2 (xii)

However, the main end the brief works towards is finding whether or not the policymaking process gives a voice to the consumers that form the social media space. After all, the point of these companies was to provide an alternative space for discourse, free from the hurdles faced by traditional forms of expression. They were claimed to be democratic spaces, where freedom of speech was the main value to be protected.

A HISTORICAL PERSPECTIVE ON TECH COMPANIES IN PAKISTAN

Meta

Meta operates several services in Pakistan including Facebook, WhatsApp and Instagram. Facebook is the second largest social media platform by number of users in Pakistan, with 60.4 million users as of January 2024.[4] Instagram has 17.3 million users in Pakistan[5] while the number of WhatsApp users stands at 52 million.[6]

Activists interviewed for this brief unanimously agreed that Meta's representatives engage more often and more visibly with policy makers as well as content creators in Pakistan, compared to any other company.

Although Meta handles matters related to Pakistan from its Singapore office, the company has engaged Karachi-based PR firm Media Matters, to handle its public relations work in the country including announcing the company's community engagement initiatives and responding to press inquiries.

The company's services have had their fair share of troubles in Pakistan. In 2010, Facebook was blocked for eight days in the country over blasphemous content. Access to the platform was also restricted in 2017 and 2021 as protests by a religious party were organised throughout Pakistan.

WhatsApp services faced severe degradation in Pakistan in July 2024, leading to a statement from Meta clarifying that the issue was caused by Internet issues in Pakistan and not related to the company as claimed by ministers.[7] In January 2025, WhatsApp announced that it was moving its content delivery network, which helped manage traffic, outside the country.[8] The decision was rooted in the degradation of internet services reported throughout 2024.

Google

Google has a 97.6% market share of search engines in Pakistan[9] and its service YouTube is the largest platform by user base in the country with 71.7 million users in 2024.[10]

YouTube was also the recipient of the longest ban of any major social media company in Pakistan. The video-sharing platform was blocked in Pakistan in 2012 for over three years and only allowed to operate in the country in 2016 when it launched a '.pk' domain, which essentially meant acceding to content removal demands from the country.

---

[4] PTA Annual Report 2023-24
[5] Ibid
[6] Demandsage WhatsApp user statistics 2025
[7] https://www.geo.tv/latest/556546-fact-check-ministers-claim-of-global-whatsapp-disruption-false-meta-confirms
[8] https://www.samaa.tv/2087327119-whatsapp-relocates-operations-from-pakistan-amid-slow-internet
[9] Statcounter Global https://gs.statcounter.com/search-engine-market-share/all/pakistan
[10] PTA Annual report 2023-24

As the ban lifted, YouTube introduced its partners program in Pakistan allowing content creators to earn money from their original creations. By 2024, there were more than 600 YouTube channels with more than one million subscribers in the country.[11] YouTube has also become an alternative platform for political reporting and analysis as clampdowns on traditional media increased.

Google also made headlines in Pakistan at the end of 2022 as it registered with the Securities and Exchange Commission of Pakistan as a 'foreign company'. The move came a year after Pakistan had passed a law requiring social media companies to register in Pakistan and was touted by the then government as not just a great victory, but as a harbinger of more companies coming to Pakistan. It was widely reported that the company would open a liaison office in the country but that does not seem to have materialised. However, the company announced an initiative to assemble 500,000 Chromebooks in Pakistan in 2024.

TikTok

TikTok has 54.4 million users in Pakistan as of January 2024.[12] The Digital Rights Foundation has called the short video sharing platform a 'medium of expression for women, gender minorities and individuals from all social backgrounds', the alternative space of alternative spaces, so to speak.[13]

While the ban on YouTube was the longest in duration, the TikTok app was targeted by bans most often. The platform was banned four times, in three different ways by Pakistan.[14]

In 2020, the app was banned by PTA for 10 days over unethical content. Next year, it was banned for 20 days by the Peshawar High Court and later for three days by the Sindh High Court. The fourth and longest ban on the platform also came in 2021. The app was banned by the PTA over 'inappropriate' content and only restored after four months.

TikTok's parent company, ByteDance, was only founded by Chinese entrepreneurs but is mostly owned by institutional investors with headquarters in Singapore and Los Angeles, which were set up due to 'business needs' according to a 2023 statement.[15] The company does not have an office in Pakistan. Company representatives say it would not be accurate to pin down operations to one specific location, with the company's main consideration being 'time zone management'.[16] However, activists believe that TikTok's Pakistan's affairs are generally managed from the company's Dubai office.

X

X (formerly Twitter) had at least 3.4 million users in the country in 2022, according to the PTA.17 The number had swelled to 4.5 million users by 2024, according to some reports.

---

[11] Google Regional Director Farhan S. Qureshi citing YouTube internal data at *Agay Barho* in Islamabad, September 2024. https://www.youtube.com/watch?v=KnzpiagPDpI&ab_channel=GooglePakistan
[12] PTA Annual Report 2023-24
[13] https://digitalrightsfoundation.pk/digital-rights-foundation-expresses-concern-over-recent-ban-on-popular-social-media-app-tiktok/
[14] https://digitalrightsmonitor.pk/tiktok-banned-for-the-fourth-time-by-pta/
[15] https://newsroom.tiktok.com/en-au/the-truth-about-tiktok
[16] Interview with Tiktok representative
[17] PTA Annual Report 2021-22

Several activists agree that X (formerly Twitter) is the biggest thorn in the government's side in the entire social media landscape. The fact that the platform's user base is smaller compared to others was often cited by authorities to justify a 2024 ban on the platform, it is undoubtedly the most significant politically. Key political figures and government officials use the platform, the latter even doing it throughout the ban imposed by their own government.

The reluctance of X to accede to content removal requests from the PTA and the government's frustration is not new. In 2018, a PTA official told a Senate committee that the platform has entertained a mere 5% of the requests filed by Pakistan for removal of 'offensive content'.[18]

When the platform was banned in 2024, soon after the general elections, the decision was not announced publicly by the government. It was only admitted later in court that the ban had been imposed as Twitter had been refusing to comply with government regulations.

X itself did not even respond to the reported ban for two months, let alone become party to the case. When the statement did come, it was curt, almost reluctantly put.

"We continue to work with the Pakistani government to understand their concerns," a statement from the Global Affairs division said.

In May 2025, as Pakistan and India's militaries clashed, Pakistani users suddenly found X to be working again. The ban went as it came: arbitrarily and without announcement.

---

[18] https://www.dawn.com/news/1427274

WHY OR WHY NOT HAVE AN OFFICE?

Pakistani authorities have wanted all four companies to set up shop inside the country for a long time. The requirement for having offices in Pakistan was introduced in the Removal and Blocking of Unlawful Online Content (RBUOC) Rules in 2020, which were amended a year later. The companies are also required to have compliance and grievance officers in the country to ensure local laws are followed.[19] Amendments to the Pakistan Electronic Crimes Act in 2025 call to establish a new Social Media Protection and Regulatory Authority, where social media companies will have to be registered.[20]

According to a digital rights activist, authorities want these companies to shift their servers to Pakistan to allow easier control over what stays on the Internet.

Activists believe that one big aspect of the lack of physical presence of these companies is simply Pakistan's market share. For their part, companies believe that globally located infrastructure allows the companies to operate in markets that may not be 'financially sustainable'.[21]

The companies also believe that the physical presence in Pakistan would not make any significant improvements in operations, particularly from a content moderation point of view. The AIC said in 2021[22] that, "...effectiveness with which social media companies moderate online content does not depend on having local presence."

Infrastructure constraints are another issue. Local experts believe that tech companies would not only want stable material infrastructure, such as electricity supply, which has gone through multiple levels of crisis in Pakistan but would also want to ensure safety for their offices and staff. All of these combined could make Pakistan an unattractive place for an office.

Meta founder Mark Zuckerberg revealed in a podcast in 2025 that he had been implicated in a blasphemy case in Pakistan at one point.[23] He added that he was not worried about the case as he was 'not planning on travelling to Pakistan anytime soon'. However, for Big Tech company representatives who would indeed have to stay in Pakistan if a physical office is opened, such instances would hardly be an attractive environment to work in.

While the companies' reluctance to set up offices in Pakistan may have business and infrastructure reasons, Pakistan's legislative frameworks for social media are not exactly a positive factor either. Amendments made to PECA in 2025 also allow SMPRA to require a social media platform to enlist in a 'manner, form, or payment of fee' as it desires,[24] a framing that is prone to misuse in a manner already being seen.[25]

---

[19] RBUOC Clause 7(6)(a) and (b)
[20] PECA 2025, Section 2Q
[21] AIC letter to Attorney General of Pakistan, February 4, 2021, Section 3.2
[22] ibid
[23] Joe Rogan Experience #2255 – Mark Zuckerberg
[24] PECA 2025, Section 2Q
[25] HRCP Legal Watch Cell Report – PECA Amendment 2025

PRESENCE WITHOUT PRESENCE, IN THREE WAYS

In the absence of a physical presence in Pakistan, these companies use three main ways to stay active in Pakistan

Compliance with content removal requests:

Although many experts point to the fact that one key hurdle to tech companies opening up offices in Pakistan is the government's need to enforce compliance, the platforms have acceded to a large number of government requests.

According to transparency reports published by Google, Pakistan's government has requested the removal of 77,597 items in 4,561 separate requests since 2011. By far the highest number of requests were made by 'Information and Communication Authority', ostensibly a reference to the Pakistan Telecommunication Authority. Although percentage of removals are not given for the entire duration, the rate was over 75% in the second half of 2024 and over 80% in the first half of 2024.

Meta does not publish the number of total restrictions requested by the government. However, its transparency report reveals that over 16,000 items were removed in 2024 alone. Meta's report also reveals another trend: the government made over 3,700 requests for user data in 2024, and the platform complied with over 82% of these requests by producing at least some information.

Rates of content removals on TikTok remain extremely high. The platform acted on 94.4% requests of content removal in the first half of 2024 (latest data available) and 93.5% in the second half of 2023. The removals in the first half of 2024 include 22,969 pieces of content removed due to community guideline violations and another 1,048 due to local law violations.

Some activists suggest that TikTok has become more accommodating of government's requests for removal of content since being banned and unbanned, but company representatives deny this impression and say that the action is based on community guidelines and has uniform application in all markets.

Although the last transparency report available for Pakistan from X is from 2021, it does reveal that content removal and information access requests have decidedly lower rates than other platforms.

The overall compliance rate of X for information requests from 2013 to 2021 stood at a paltry 0.5%. However, it did rise to 11% in the emergency category in the second half of 2020. The rate of removals based on government requests for X stands at an overall rate of 45.3% and has risen to over 50% twice since 2018.

Relationship management with government

While rights activists and content creators alike maintain that access to tech company representatives is not easy, news reports show that representatives from the tech companies actively meet and communicate with the government at a professional level. In one instance, as an activist noted, the government's consultation with civil society members consisted of a zoom call with 80 participants, leaving hardly any time for meaningful input from a single participant.

However, when it came to consulting tech companies, ministry officials chose to hold meetings at a delegation level.

Delegations from the tech companies do more than just meet officials but are particular to meet with the minister and major officeholders in charge and sometimes even higher officials. An instance of this was Meta's VP Simon Milner meeting PM Shehbaz Sharif in 2024.

As Milner said later in an interview, meetings with Pakistani officials are 'extremely engaged' and are about more than just serving the visiting tech dignitaries a cup of tea.[26]

The delegation meetings also carry the aspect of being multi-faceted. For instance, a Google delegation that met the IT minister in June 2024 included Andrew Ure, Head of Trade and Economic Affairs, Asia-Pacific for Google, Kyle Gardener, Government Affairs and Public Policy Lead, South Asia, and Farhan Qureshi, Google's Country Head for Pakistan. This signals that the company is willing to engage the government at multiple levels of its governance structure.

In 2021, George Salama, the regional head for Twitter showed up at a meeting of the Parliamentary Committee on Kashmir via Zoom to be 'grilled' by members of the National Assembly for 'silencing' voices of Pakistani and Kashmiri activists on the platform.[27] In the meeting, the Twitter representative offered to hold workshops in collaboration with the PTA to raise awareness about the platform's regulations.

Meanwhile, the companies also conduct campaigns in partnership with government. In late 2023, as the country prepared to go to the polls, Meta teamed up with the Election Commission of Pakistan for a 'digital civic education campaign'. The campaign included other partners including *PakVoter* and *Shehri Pakistan* and was aimed at promoting voter rights and fighting misinformation.[28]

In 2023, PTA signed an MoU with TikTok to hold training programs and guidelines for teachers, parents, and students that will be covered through, workshops, seminars, webinars, awareness videos to promote digital safety in schools. PTA and TikTok also teamed up in 2024 to launch the *#DigitalHifazat* contest to promote digital safety and also hosted a Youth Safety Summit to promote responsible social media use.

Community events

As a substitute for not having an office and being constantly in communication with local consumers, the companies try to organise community events in collaboration with local partners.

Meta It regularly holds community engagement events across the country. Events over the last year included a session with notable content creators who had launched WhatsApp channels as well as a new instalment of the *'SheMeansBusiness'* program, specifically targeted at female entrepreneurs.[29] Meta also organised a community summit in Islamabad in July 2024, with the company's Head of Safety Policy for the Asia Pacific Priyanka Bhalla in attendance.[30]

---

[26] Simon Milner's interview with TCM during visit to Pakistan, September 2024.
[27] https://na.gov.pk/uploads/documents/1613492391_399.pdf
[28] https://www.thenews.com.pk/print/1114067-meta-project-to-protect-integrity-of-upcoming-polls
[29] https://mediamatters.com.pk/meta-remains-committed-to-support-digital-empowerment-of-pakistani-women-entrepreneurs/
[30] https://propakistani.pk/2024/07/03/metas-community-summit-with-civil-society-partners-in-pakistan/

Google It has undertaken a host of initiatives in the country to equip Pakistanis with digital skills and provide support to other industries. Through its partner Tech Valley, Google said it has trained over 1,000 journalists and as many teachers and set up programs to award Google Career Certificates to people across Pakistan. It also set up a job portal to connect those holding certificates with prospective employers.

The company also launched its fact-checking initiatives in Pakistan and hosted an event named *'Agay Barho'* in Islamabad, where it brought together game developers as well as policy makers.

In 2016, **Twitter** launched an initiative called *'Hamara Internet'* to promote awareness about women safety in collaboration with Digital Rights Foundation.[31]

In 2022, **TikTok** began a campaign in collaboration with Zindagi Trust to promote digital safety awareness in government schools. Students from grades 7 to 9 were taught about navigating online spaces and protect themselves against cyber-bullying and scams. In 2024, TikTok organised a workshop to empower small and medium businesses by teaching them to leverage the power of digital marketing.

The company also holds creator awards to recognise the best content of the year in several categories.

---

[31]   https://blog.x.com/en_us/a/2016/digital-rights-foundation-launches-campaign-to-combat-violence-and-harassment-against-women-in

KEY CONCERNS

Backchannels and disenfranchisement

Rights activists believe that the reluctance of tech companies to openly submit to Pakistani laws yet remain compliant and even maintain cordial terms with government points to a darker trend, the existence of backchannels where these two stakeholders are regularly in contact. A key case in point is X's belated response to the platform being banned in Pakistan, even though it had chosen not to contest the ban in court. More troubling is the fact that these communications take place out of sight of the public, effectively denying them any understanding of how the policy processes are carried out, let alone have a say in them. Some activists have even described this as 'collusion' to cut out the consumer. The users on these platforms exercise their agency by being able to report content. However, actions on these reports are taken by the companies in accordance with their community guidelines, which often do not take specific Pakistani contexts into account.

Who decides terms of engagement?

Another concern is that the tech companies only engage members of the civil society and even the government on the terms and times of their choosing. This means that Pakistani stakeholders do not have the power to bring them to the table on matters of their own concern. This, in turn, leads to the government resorting to firmer methods of control, such as blanket bans on entire platforms, to have some bargaining power.

Rising compliance in the face of securitisation

All activists consulted for this brief said that government demands for content removal are not the decisive factor in preventing companies from having a physical presence in Pakistan. In fact, as discussed above, compliance to government requests seems to be a major tool being used by the companies to maintain relations and keep their platforms afloat in Pakistan.

The latest PECA amendments are pointing to what experts believe to be weaponisation of security concerns to dictate the policy framework. The Ministry of Interior, in charge of law enforcement and investigation agencies, has been given a seat in the newly formed SMPRA and what used to be government requests for content removal will now resemble orders. Coupled with the high rates of compliance, this means that the space for freedom of expression will only continue to shrink for citizens.

Symbolic actions

Activists believe that while community events are not without value to rights activists and content creators, they are largely symbolic in nature.

One expert said that the social media companies are obsessed with being identified as champions of freedom of speech as well as responsible tech corporations. While the platforms themselves follow rules set by themselves and to an extent by the governments, the companies want to

promote the image of themselves as democratic mediums of communication. It is from here that the idea of events such as community summits and content creator workshop arises as many events are based around online safety, privacy and measures to counter misinformation and disinformation.

Experts also point out that many community events organised by the social media companies are actually trying to address issues that are the result of the company's policies themselves. A key example would be Meta's partnership with ECP to fight electoral disinformation, when algorithmic patterns were the main cause of the said disinformation on Facebook.

CONCLUSION: WHAT IS AT STAKE?

This policy brief comes a few months after Pakistan's parliament passed new amendments to the Prevention of Electronic Crimes Act, amid fierce opposition from rights advocates and journalists. The bill has criminalised fake news, and has drastically expanded the definition of what counts as a social media platform. The bill also contains provisions to create four new institutions to deal with social media and content regulation including Social Media Protection and Regulation Authority, a Social Media Complaint Council, Social Media Protection Tribunals as well as the National Cyber Crimes Investigation Agency.

Examining the implications of the creation of these bodies in detail is beyond the scope of this brief. However, activists argue that while the creation of these bodies might have some practical concerns at their basis (such as, the primary role of PTA being to regulate the telecom sector), the end game is more control. One example of this is the Ministry of Interior being permanently given a seat in SMPRA.

PTA's independence as a regulator has been continuously called into question. One instance of this was when the Ministry of Interior filed a reply in court about the blockage of X in Pakistan, saying that the government has 'no alternative' but to ban the platform in the interest of national security. Previously, there was at least the impression of the PTA treating government directives as suggestions, not binding orders. However, in this case PTA simply said that it had received directives and let the ministry explain the decision. The new institutional framework under PECA 2025 changes this and points to a disturbing trend: authorities are ready to do away with even the pretence of independent regulators and action on the ministry's orders could become the norm.

As the authorities and companies vie for control of online spaces in the country, the biggest consequence is more disenfranchisement for the public. The effects of this disenfranchisement include more curbs on **right to information, expression and connectivity**. All of these rights, as the HRCP put it,[32] are integral to a 21st century democracy. Failure to protect these freedoms poses threats to the public's trust in online platforms as democratic spaces and in the government's will and ability to protect their rights.

As the situation currently stands, social media users are merely bystanders, waiting to find out which platform they will be able to access in the morning, what information will reach them and never sure of what they will be allowed to post online. Decisions on their access to their fundamental rights will be made for them, out of their sight.

The battle for the consumers and civil society has always been about reclaiming space for freedom of expression. While that fight must be fought, even as it looks increasingly difficult, this examination of how social media companies operate in Pakistan is a reminder that the more immediate battle is just managing to get a seat at the table.

---

[32] https://www.dawn.com/news/1887592

RECOMMENDATIONS:

1. Publish transparent takedown and data request reports

The Government of Pakistan must begin issuing quarterly public reports detailing all content takedown and user data requests submitted to tech platforms. These reports should classify requests by the originating institution (e.g., PTA, Ministry of Interior) the legal basis invoked, the platform targeted, and the content type. Transparency in this area is crucial for public trust and accountability and ensures that content governance is not outsourced to opaque corporate discretion.

2. Disclose government–platform engagements

All formal interactions between government officials and social media companies—whether through official meetings, intermediaries, or local PR firms—should be documented. Meeting agendas, attendance lists, and minutes must be made public. These disclosures are essential to prevent undisclosed agreements or "backchannel" arrangements that sideline public interest.

3. Institutionalize parliamentary and civil society oversight

Tech company delegations should not meet government officials in private or ad hoc settings. Instead, such interactions should be hosted by parliamentary committees or statutory bodies in charge of media, technology, or human rights. These sessions must be on the public record. Furthermore, civil society organizations and digital rights experts must have a permanent voice in any social media regulatory authority, with voting rights—not just consultative status.

4. Ensure full disclosure of joint campaigns

When tech companies collaborate with state institutions on digital safety, misinformation, or civic engagement campaigns, the full financial and operational terms must be disclosed. This includes naming all implementing partners, disclosing budgets, and publishing post-campaign impact assessments. Public money and platform power should not mix in the dark.

5. Localize community guidelines and prioritize harm reduction

Global content policies must be adapted to Pakistan's local legal and social context. This includes heightened sensitivity and procedural safeguards in cases involving blasphemy or political dissent, where misuse can result in real-world harm. At the same time, tech platforms and regulators must prioritize actual harm to users—harassment, doxxing, disinformation—over vague notions of "state interest."

6. Establish minimum standards for local engagement

Even without physical offices, platforms must commit to a baseline of operational transparency in Pakistan. This includes appointing publicly named focal persons, establishing dedicated channels for user complaints, and issuing annual country-level transparency reports detailing takedowns, training initiatives, and policy engagements in Pakistan.

7. End opaque dealings and guarantee user representation

Both platforms and the state must end undocumented, informal arrangements that bypass users. Any engagement that affects content moderation or access must be visible, reviewable, and contestable.

8. Audit compliance patterns and enshrine rights

Independent judicial oversight should be developed to review takedown and compliance trends to ensure they align with constitutional rights and international human rights norms. Ultimately, Pakistan should move toward codifying these protections in a Digital Rights Charter, co-developed with civil society, which establishes binding safeguards for online expression, privacy, redress, and due process.

IRADA

Institute for Research, Advocacy, and Development (IRADA), is an independent social enterprise aimed at catalyzing participatory reforms and development through innovative research, proactive policy strategies, and vigorous capacity building initiatives. Registered as a company limited by shares with the Securities and Exchange Commission of Pakistan (SECP), the organization endeavors to promote inclusivity and pluralism, governance and information, freedom of expression and media development, and the rule of law and access to justice.

IRADA focuses on promoting:

- inclusivity and pluralism through support for civil liberties, peace and rights of minorities and marginalized communities;
- governance and information through support for right to information, transparency and open government;
- freedom of expression and media development through support for professionalism in media, safety of journalists and enabling laws for free speech;
- rule of law and access to justice through support for fundamental rights and equality before the law.

Website
www.iradapk.org

Facebook
facebook.com/IRADAPK/

X (Twitter)
x.com/iradapk