

Critical Analysis of The Recent Legislation and Initiatives to Curb Fake News and Disinformation in Pakistan: Challenges and Way Forward

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In the post-truth era, fake news and disinformation have emerged as critical challenges, influencing political, social, and economic landscapes. In Pakistan, the rapid spread of fake news through social media has led to social polarization, security risks, and political instability. While the government has enacted laws such as the Prevention of Electronic Crimes Act (PECA) 2016 and introduced regulatory measures to curb misinformation, these efforts face criticism for political bias and excessive control. The study analyzes recent legislative measures and government strategies, identifying legal loopholes and the need for balanced regulatory frameworks. It highlights the importance of fact-checking initiatives, digital literacy programs, and the role of independent media bodies in countering disinformation. The findings suggest that Pakistan must adopt transparent, consensus-based policies to effectively tackle fake news without undermining freedom of expression. A comprehensive approach, including AI-driven fact-checking and international collaboration, is crucial to combating disinformation.

Key words:

Fake News, Disinformation, Social Media Regulation, Freedom of Expression, Cyber Laws

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Introduction

We are living in a post truth era where the value of truth has become less relevant from social and political perspective. Fake News is described as purposefully crafted, sensational, emotionally charged, misleading or totally fabricated information that mimics the form of mainstream news (McLeod, 2020). Disinformation is fake news that is created and spread deliberately – by someone who knows fully well that it’s false (BBC, n.d.). Misinformation, however, is a news that is conceived and propagated unintentionally or inadvertently by someone without realizing that it is fake and will have consequences. Fake news as a type of online disinformation with misleading and/or false statements that may or may not be associated with real events, intentionally designed to mislead and/or manipulate a specific or imagined public through the appearance of a news format with an opportunistic structure (title, image, content) to attract the reader’s attention in order to obtain more clicks and shares and, therefore, greater advertising revenue and/or ideological gain (Baptista, 2022). The entire world is facing the problem of fake news or disinformation. The countries allege each other to use fake news or disinformation as tool to meddle in the election process and influence election results.

Pakistan, in recent years, has witnessed a rising trend of fake news and disinformation regarding social, political, security, religious, electoral and economic matters through social media and online channels. And this phenomenon has serious repercussions for social cohesion, national security and political landscape. Though Article 19 of the Constitution of the Islamic Republic of Pakistan recognizes freedom of opinion, expression and speech as fundamental right of every citizen of Pakistan and it also guarantees freedom of press, nevertheless, such freedom is to be exercised subject to reasonable restrictions in the interest of glory of Islam, integrity, security or defence of Pakistan, friendly relations with foreign States, public order, decency and incitement to an offence (The Constitution of Islamic Republic of Pakistan, 1973). Earlier, the sources of news or information were limited, so, the government, in order to regulate, used Ministry of Information and Broadcasting and Pakistan Electronic Media Regulatory Authority. Moreover, the newspapers or electronic media platforms had their editorial boards which acted as internal regulators to keep an oversight on authenticity or credibility of information. However, flow of information through social media or online forums presents a unique challenge to the Government in particular and society in general. In 2016, the then Government legislated the Prevention of Electronic Crimes Act, 2016, and it was amended from time to time, to control fake news or disinformation disseminated through social media platforms. The Pakistan Telecommunication Authority has also been used to remove unlawful content and block social media platforms e.g. blocking YouTube for not removing blasphemous content. In 2020, the then Government, drawing powers from the Pakistan Telecommunication Re-organization Act 1996 and the PECA, 2016, introduced the Citizens Protection (against online harm) rules, 2020, wherein it was made obligatory on the Social Media Companies to register with the Authority, establish their offices in Pakistan and to block accounts involved in fakes news or disinformation. Moreover, EU Disinfo Lab report unveiled India’s involvement in spreading fake news or disinformation in Pakistan (The Express Tribune, 2020).

Despite repeated endeavours of the successive Governments, the fake news or disinformation kept spreading unabated.

Statement of the Problem

There is no denying the fact that the rampant dissemination of fake news and disinformation, in Pakistan, has augmented social polarization, tarnished image of state institutions, spoiled political culture and contributed in deteriorating law and order situation, however, the federal and provincial governments, have adopted certain strategies and enacted laws to curb fake news or disinformation. It is, therefore, imperative to critically analyse the recent legislations, initiatives and strategies of the federal and provincial governments, in Pakistan, to curb fake news and disinformation, so as to assess the challenges, identify loopholes in the existing legal regime or strategies, if any, and propose the way forward.

Research Questions

No.1: What are the important components of the recent legislations, initiatives and strategies of the federal and provincial governments to deal with fake news or disinformation?

No.2: How effective these legislations, strategies and initiatives have proven or will prove in curbing fake news or disinformation?

No.3: What can be or have been the impacts, other than handling fake news, of these legislations, initiatives and strategies?

No.4: Is criminalising fake news or blocking a social media platform an effective and wise strategy?

No.5: What are the legal frameworks worldwide to deal with fake news or disinformation?

Scope of the Study

The study primarily focuses on critically analysing the recent regulatory framework to curb fake news or disinformation, which includes: a) Legal Frame Work i.e. the Prevention of Electronic Crimes (Amendment) Act, 2025, the Punjab Defamation Act, 2024 and the PEMRA (Amendment) Act, 2023, and b) the Institutional Frame Work. In addition to this, in order to eliminate fake news or disinformation, the government's recent strategies of installation of firewall and blocking access to social media platforms will also be analysed.

Research Methodology

This study is qualitative in nature. For the purpose of this study, data has been collected from secondary sources i.e. news articles, journals, reports, laws etc. Thereafter, the data has been analyzed using research tools such as Situational Analysis, Legal Analysis, PESTLE Analysis and Policy Gap Analysis.

Literature Review

For the purpose of this study following literature has been reviewed;

- i. The Prevention of Electronic Crimes (Amendment) Act, 2025
- ii. The Punjab Defamation Act, 2024
- iii. The Defamation Ordinance, 2002
- iv. The PEMRA (Amendment) Act, 2023
- v. The Pakistan Telecommunication Re-organization Act, 1996 as amended from time to time
- vi. Trial Watch Fairness Report- A Clooney Foundation for Justice Initiative
- vii. Chilling Legislation: Tracking the Impact of “Fake News” Laws on Press Freedom Internationally by Gabrielle Lim and Samantha Bradshaw
- viii. Review a Working Definition of Fake News João Pedro Baptista and Anabela Gradim
- ix. Pakistan Electronic Media Regulatory Authority’s Report 2021-23
- x. Countering disinformation in Pakistan-Lessons and recommendations for digital media
- xi. Safe Use of Social Media - Online Safety Guide by Pakistan Telecommunication Authority
- xii. Establishment Division’s OM dated 2nd of September, 2024 providing updated guidance for the usage of Social Media Platforms by the Government Servants
- xiii. Removal and Blocking of Unlawful Online Content (procedure, oversight and safeguards) rules, 2021
- xv. Case Laws

Dimensions of the Issue

The study primarily deals with the regulatory and institutional dimensions of the Issue. It highlights the legal regime at the federal and provincial level to curb fake news or disinformation. Thereafter, it unfolds the effectiveness of the legal regime. It critically evaluates the strengths and weaknesses of the institutions responsible for dealing with the fake news or disinformation. The study also explores as whether fake news or disinformation shall be dealt as a civil wrong or criminal act. The aspect of political economy in deciding the strategies to deal with fake news or disinformation has also been discussed.

Dimensions of the Analysis

Political Dimension

The fake news or disinformation is a national problem, however, the response to this problem has never been consensus oriented. Each political party comes up with its own strategy to deal with it. During, the PTI led government, when legislative measures were taken to curb fake news or disinformation, same were criticized by the then opposition. Similarly, the present opposition is criticizing the Prevention of Electronic Crimes (Amendment) Act, 2025 and the Punjab Defamation Act, 2024. The consensus is not built among different stakeholders at the time of policy making.

Such strategies and legislations are not properly debated in the Parliaments or provincial assemblies and are hurriedly passed. Consequently, the implementation becomes difficult. Currently, the media organizations and opposition are agitating on the Prevention of Electronic Crimes (Amendment) Act, 2025. Furthermore, there is a tendency in the political governments to silence their critics or opponents using such measures in the garb of tackling fake news or disinformation. The journalists are genuinely apprehensive that the recent legislation will be used to target them.

Administrative Dimensions

On the administrative side, the enforcement of the Prevention of Electronic Crimes (Amendment) Act, 2025 will face challenges. For instance, the Social Media Protection and Regulatory Authority has been tasked to enlist the Social Media Platforms. How will that Authority achieve this goal remains unexplained? The Social Media Protection and Regulatory Authority has been given powers to issue directions to the Social Media Platforms, however, how will it enforce the directions remains unaddressed. Pakistan is already facing financial crunch and the government has launched campaign to reduce the number of authorities and organizations through the Rightsizing Committee, however, through the latest legislation four new forums have been carved out to curb fake news or disinformation. How will these forums be funded remain unexplained?

Social Dimensions

The fake news or disinformation has polarized the society. In order to keep the social cohesion intact, it is important to curb fake news or disinformation. However, the strategies or initiatives to deal with fake news or disinformation shall not have negative impacts on the societal progress or growth. For instance, blocking access of public to any social media platform is against their fundamental rights and it stops their avenue to information. Similarly, using the tactic of slowing down internet is also detrimental because livelihood of huge number of people is dependent on working online. Moreover, the measures to control flow of information creates a hatred against the government. The best way is to educate the society about how to differentiate between fake news and authentic news.

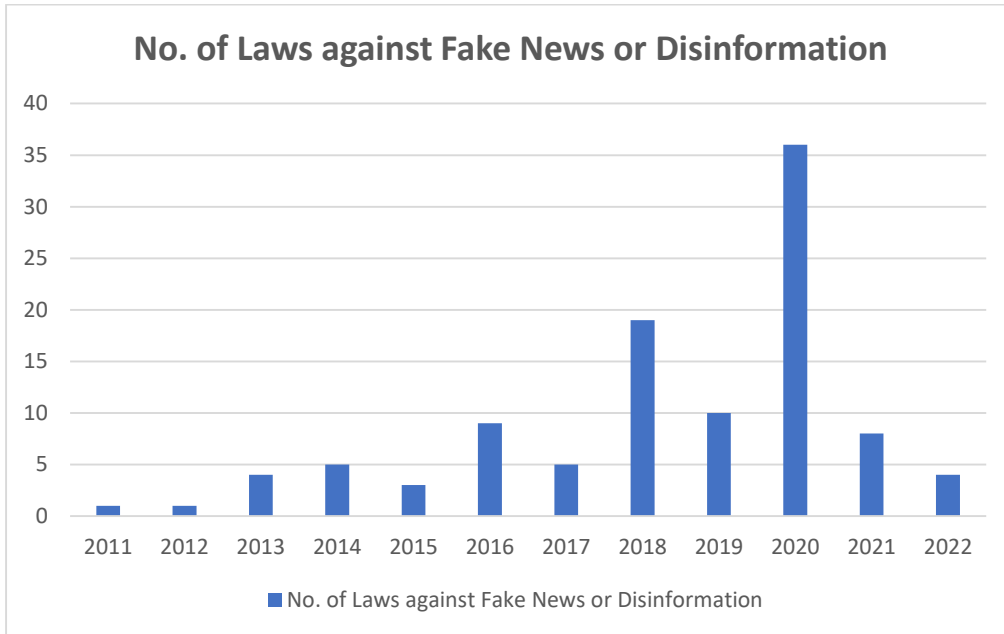
Economic Dimensions

Creating new forums such Social Media Protection and Regulatory Authority, Social Media Complaint Council, Social Media Protection Tribunal and National Cyber Crime Investigation Agency will require more financial and human resources. Thereafter, money will be required for the training and capacity building of the human resource. In addition to this, the other measures to curb fake news or disinformation are having detrimental impacts on the overall economy of the country.

Analysis of International Landscape - Strategies to curb misinformation, disinformation & fake news

Around the world, people have been inundated with false, misleading, and deceptive information about health, politics, and science. Since, 2011, particularly during Covid-19 endemic, around 78 countries have legislated laws to control fake news,

disinformation or misinformation with some focusing on improving platform transparency and media literacy, while, an overwhelming majority has criminalised the creation and dissemination of fake news. An analysis of 105 laws, enacted from 2011 to 2022, unfold four types of legal penalties; excessive monetary fines, imprisonment, content control & correction and administrative regulations such as licensing, data localization and mandated press or media councils. (Bradshaw, 2023).



Pecuniary Penalties

Most of the laws enacted by the governments, worldwide, contain fines or pecuniary penalties for individuals, media organizations and social media platforms held responsible for creation and dissemination of fake news or disinformation. In, 2018, the government of France legislated La Lutte Contre la Manipulation de l'Information (The Fight Against Information Manipulation) law. As per this legislation, an individual or organization charged for spreading disinformation or fake news would be fined to the tune of €75,000. In Ethiopia, a law got enacted to curtail hate speech and disinformation, the Prevention and Suppression Proclamation no. 1185 / 2020 under which a fine to the tune of 100,000 birr could be imposed if an individual or entity, having more than 5000 followers, was found involved in spreading fake news or disinformation.

Analysis

Though the laws can limit the spread of fake news or disinformation but they give powers to the Government to silence media or social media platforms. Such laws can be effective if there is an appellate forum provided in law wherein the individual or organization can challenge the orders of the government.

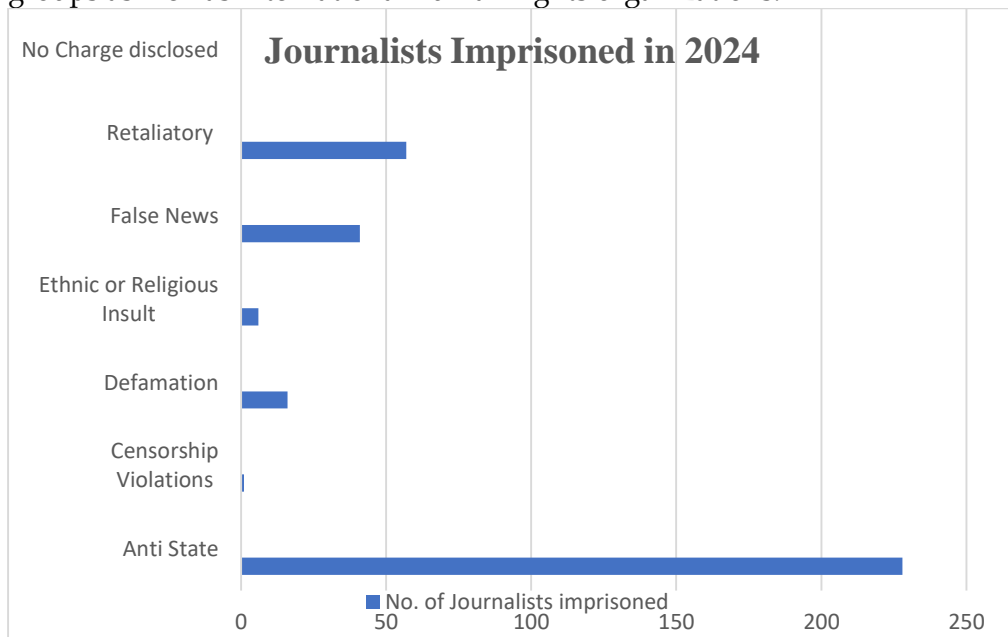
Criminalization, Arrests and Imprisonments

Second form of laws are those which prescribe imprisonment or incarceration for creation or dissemination of fake news or disinformation. The government of Cambodia issued a Joint Directive, in 2018, wherein an individual or organization proven to spread fake news or disinformation could face imprisonment up to 2 years.

During Ukraine war, the Russian government enacted laws criminalising spread of content against Russian military and embassies. So much so that the countries ranking high on the democracy index have passed such legislations e.g. in 2019, Denmark introduced amendment to Penal Code whereby anyone involved in dissemination of fake news or disinformation that helped foreign state actors to influence public opinion, could face sentence up to twelve years. In 2018, Egyptian government incarcerated nineteen (19) journalists, Cameroon government arrested four (4) journalists, Rwanda government arrested three (3) while China and Morocco arrested one (1) each (Journalists, 2018). From 2011 to 2015, twenty-two (22) journalists were sentenced under such laws while from 2016 to 2022 the number of imprisonments swelled to 225 (Journalists, 2022). In 2024, journalists sentenced include a total of fifty-four (54) serving more than ten (10) years; fifty-five (55) between five (5) and ten (10) years, and sixty-two (62) between one (1) and five (5) years (Journalists, 2025).

Analysis

Though these laws create deterrence against the dissemination of fake news but they, firstly, empower authoritarian regimes to punish their critics, thus, muzzling the voices of dissent. Secondly, such laws lead to self-censorship as the journalists or individuals or organizations, under fear of imprisonment, avoid doing criticism and even stay away from sharing correct news or information. Thirdly, the governments receive criticism from digital rights groups as well as international human rights organizations.



Committee to Protect Journalists Report

Content Removal & Corrections

The third type of laws are the ones which require the individuals, organizations or social media platforms to remove or correct the content which is deemed to be fake or can lead to disinformation. Egypt’s 2018 law on the Organization of Press stipulates that the broadcast can be banned or suspended if found involved in spread of fake news. Tanzania’s Electronic and Postal Communication (online content) regulations prevent online service providers from releasing prohibited content.

Singapore's 2019 protection from online falsehoods and manipulation act, 2019 made it obligatory on the publisher or the individual or social media platform to correct the content in case it was found fake.

Analysis

In these laws, the definition of the content is deliberately kept vague so that any content which the governments or authorities consider against their interest can be removed easily.

Administrative Regulations

The fourth set of laws contain licensing regime, transparency requirements, localization of data, setting up councils or maintaining press registry to control fake news or disinformation. Belarus's amendment in the Media Laws, in order to address the issue of fake news, compelled organizations to register with the government. The authors of the posts as well as those who comment shall give their correct identity. Vietnam's Cyber Security Law requires that foreign and domestic platforms set up offices and store data locally.

Analysis

These laws increase government surveillance. The localization of data can end up being an easy tool for the government to access it, thus, compromising data privacy. With or without warrants, the official agencies can access the data from the offices.

Policy GAP Analysis

In Pakistan, fake news or disinformation have grave consequences for national security and societal cohesion. In order to curb fake news or disinformation, the incumbent government introduced the Prevention of Electronic Crimes (Amendment) Bill, 2025, which after approval of the both houses of the Parliament and assent of the President became an Act of the Parliament on January 29th, 2025. Prior to this Act, the incumbent government adopted for the strategies or initiatives such as installation of firewall and banning of social media platforms e.g. Twitter or X to curb fake news or disinformation. The Punjab government, in May, 2024, introduced the Defamation Act, 2024 to impose penalty on defaming someone by hurling false allegations or propagating fake news or disinformation through social media platforms or any other mode of communication. However, strategies such as public awareness, training of journalists, fact checking initiatives, increasing digital literacy, use of modern tools and artificial intelligence to counter fake news or disinformation have never been priority of any government. The present legal regime and initiatives have certain defects due to which the political government is facing criticism from all segments of the society. Earlier, Pakistan's legal regime to curb fake news or dissemination suffered from absence of definition of fake news or disinformation in laws. For instance, PEMRA's law did contain the definition of fake news or disinformation and in 2023, for the first time, the definition of disinformation / misinformation was inserted through the PEMRA (Amendment) Act, 2023. Prior to the enactment of the Prevention of Electronic Crimes (Amendment) Act, 2025, the fake news or disinformation was handled by the Federal Investigation Agency, however, it remained unsuccessful in securing convictions from the courts due to flawed prosecution.

In the Prevention of Electronic Crimes (Amendment) Act, 2025, the fake news or disinformation has been criminalized with punishment of up to three (03) years or with fine up to two (02) million or with both. However, this has received strong backlash from both local and international journalists' associations. Contrarily, the Defamation Act, 2024 of the Punjab government declared defamation through fake news or disinformation as civil wrong. So, there is a gap in policy as whether fake news or disinformation shall be treated as a civil wrong or a criminal offence.

Pakistan's ranking in the World Press Freedom Index 2024, released by Reporters without Borders is 152 (Borders, 2024). Therefore, any policy adopted to curb fake news or disinformation has to maintain a fine balance between countering fake news and not restricting/hurting freedom of press. There is lack of consensus among the stakeholders as how to handle the dissemination of fake news or disinformation. Due to lack of consensus, a uniformed strategy could not evolve or develop. For instance, while drafting the Prevention of Electronic Crimes (Amendment) Act, 2025, the opposition political parties, digital rights activists and media associations / bodies were not consulted. Therefore, there is an uproar against the new law. Though, the new legislation proposed for creation of Social Media Protection Regulatory Authority, Social Media Council of Complaints, Social Media Tribunal and National Cyber Crime Investigation Agency but all are under the Government's control. The authority to appoint their chairpersons or heads or members exclusively vests with the Federal Government. Moreover, the Federal Government has powers to remove the chairpersons or members of the forums envisaged in the new legislation. This aspect of the legislation creates a credibility gap and, thus, such forums are perceived as tools for settling political scores. Same problem existed with the PEMRA as well, however, in 2023, by introducing an amendment, the power to appoint Chairman PEMRA was vested in a Parliamentary Committee having equal representation from both treasury and opposition benches in the National Assembly and the Senate. Similarly, the Government of Punjab, while introducing, the Defamation Act, 2024, did not consult all stakeholders.

The policy to handle fake news or disinformation suffers from the measures to convince the Social Media Platforms to enlist with Pakistan's authorities, appoint their representatives and open their local offices. Though, the recent legislation empowers the Social Media Protection and Regulatory Authority to enlist the Social Media Platforms, however, how to do that remains unanswered. Moreover, the Social Media Protection and Regulatory Authority is also empowered to issue directions to the Social Media Platforms for blocking of accounts or removal of content. Nevertheless, how will the Authority enforce its directions, does not make any mention in the law. For instance, the Brazil's court ordered blockade of social media platform X, formerly known as twitter, on the accusation that the accounts present there are spreading fake news. These accounts belonged to followers of President Jair Bolsonaro. The Court also ordered google and Apple to remove X from their software applications and directed that any individual found accessing X through virtual private network would be subjected to fine to the tune of R \$ 50,000 (BBC, 2024). Earlier, the social media platform resisted compliance of the Court orders, however, later on, the social media platform had to pay \$ 5 million fine, block the accounts and appoint local representative, thus, it was restored by the court (Wells, 2024).

The strategy to handle fake news or disinformation by blocking access to the social media platforms or installing firewall also suffers from lacunas. The people are able to access the social media platforms using VPNs. Even, the government functionaries use VPNs to operate their official accounts on Twitter or X. More importantly, such tactics have repercussions on Pakistan's economy. The IT industry, in general, while, freelancing and e-commerce, in particular, bear the brunt of such policies.

The International community and human rights organizations are strong proponents of freedom of speech and expression. The European Union, Amnesty International and Reporters without borders have expressed strong concerns on Prevention of Electronic Crimes (Amendment) Act, 2025. The EU's representative on human rights expressed that such measures could jeopardize Pakistan's GSP Plus status. The policy lacks a strategy as how to showcase our perspective internationally that fake news or disinformation is having dreadful social, political and economic impacts, thus, it is imperative to curtail it.

Analytical Techniques Employed

Situational Analysis

Gallup of Pakistan's Survey reveals that in Pakistan two in five adults and two thirds of men and women under the age of thirty use social media apps such as TikTok, Facebook and Instagram (Pakistan, 2024). It is also reported that Pakistan has over 111 million internet users and 64.6 percent of the total internet user are using social media (Jamal, 2024). Pakistan Telecommunication Authority has blocked 1.3 million URLs due to anti-Islamic, indecent and immoral content as of July, 2024 (Desk, The Express Tribune, 2024). The government has blocked approximately 80,000 SIM cards for disseminating fake news, following increasing concerns about misinformation on social media. (Desk, The Express Tribune, 2024). Due to wide spread of disinformation and fake news, the political environment is getting polarized. Different political parties and their supporters hurl abuses and mudslinging on each other due to political differences. These include character assassination campaigns as well. You tube channels spread fake stories regarding personal lives of the political leaders and the listeners, without questioning veracity of the claim, tend to believe in such tales. The Punjab Government, in May 2024, legislated the Defamation Act, 2024. The Supreme Court of Pakistan is even not safe from the wrath of fake news and disinformation. So much so that the last Chief Justice Qazi Faez Isa was dragged into a religious controversy through fake news when he announced judgement in Mubarak Sani's case. The Supreme Court's public relations officer had to come up with a press release clarifying the matter. In another instance, a fake news was spread that the Supreme Court judges quarrelled with each other on some issue. And the news was put to rest by a press release from the Supreme Court's Press Relations Department. The Inter Services Public Relations (ISPR) had also in the recent past held press conferences to dispel the impressions, by fake news, casted about Armed Forces. And the spread of fake news and disinformation continues spreading blatantly because of no fear of punishment. Recently, the Economic Coordination Committee of the Cabinet (ECC) approved Rs. 2 billion for Inter Services Public Relations to counter the propaganda.

The performance of FIA Cybercrime Wing dealing with fake news and unlawful content on social media and other platforms is abysmal and same is visible from the table no.1. In this backdrop, with the approval of the both houses of the Parliament, the Prevention of Electronic Crimes (Amendment) Act, 2025 has been notified.

Cyber Crime Convictions (2020-2024)						
Year	Complaints	Verified	Enquiries	Cases	Accused arrested	Conviction
2020	102,000	98,882	9,112	601	625	20
2021	115,868	80,803	15,766	1,224	1,306	38
2022	145,667	83,552	14,380	1,469	1,700	48
2023	152,136	82,396	18,012	1,375	2,007	92
2024	123,893	68,672	16,555	1,044	1,387	24
Total	639,564	414,260	73,825	5,713	7,020	222

Table No.1: Source (Ali K. , Dawn Newspaper, 2025)

SWOT-EETH Analysis of Institutions responsible for curbing fake news & disinformation in Pakistan

Organization	Role	Performance	Enhancing Strengths
Strengths			
Social Media Protection & Regulatory Authority	<ul style="list-style-type: none"> In terms of section 2(1)(a) of the recently notified Act, titled “the Prevention of Electronic Crimes (Amendment) Act, 2025”, Social Media Protection and Regulatory Authority has been Established In terms of section 2A of the Act, the Federal Government is to notify the Authority. <p>Powers of the Authority In terms of section 2 B of the Act, the Authority shall</p> <ul style="list-style-type: none"> Promote education, research Ensure online safety / rights of the persons, on social media, from any harm 	<ul style="list-style-type: none"> Before the creation of this Authority, there was no specified body regulating social media in Pakistan. FIA Cyber Crime Wing was used to deal with dissemination of fake news or unlawful content on social media The aspect of promotion of education and research in the field of social media in general 	<ul style="list-style-type: none"> The Federal Government’s exclusive role in appointment of Chairpersons and members will damage the credibility and impartiality of the Authority. So, the appointment mechanism needs to be revisited. It will strengthen the

	<ul style="list-style-type: none"> • Regulate unlawful or offensive content • Enlist social media platforms • Renew or suspend or revoke enlistment of social media platforms • Partially or fully block social media platform • Issue guidelines to social media platforms • Impose fines • Engage in HR development & training • Enter into contracts for discharging duties, capacity building • Receiving and processing complaints and providing remedial measures <p>In terms of section 2 C, the aggrieved person can file complaint to the Authority</p> <ul style="list-style-type: none"> • For blocking of offensive content • Blocking access to fake information • The Chairperson of the Authority shall pass orders within 24 hours for removal of the content <p>In terms of section 2D, the Authority shall consist of</p> <ul style="list-style-type: none"> • Chairperson • Eight other members • Secretary Interior, Chairman PTA, Chairman PEMRA as ex-officio members • Chairperson and members shall be appointed for non-extendable tenure of five years 	<p>and fake news in particular is a positive aspect of this Authority</p> <ul style="list-style-type: none"> • This Authority will issue directions for blocking of social media platforms if they are proven to be disseminating unlawful content. • The aspect of training of Human Resource is also a positive aspect as so far nothing much has been done on this side. • The Authority, after this new act, can sign Mousy, Agreements and contracts with its counterparts. It will open avenue for learning from other countries as how are they handling social media to curb fake news or disinformation. • The Authority's composition 	<p>Authority. This clause may be rephrased as with the consensus of Leader of the House and Leader of the Opposition in the National Assembly or with the approval of a parliamentary committee having equal number of members of opposition and treasury benches from the National Assembly and the Senate.</p> <ul style="list-style-type: none"> • Moreover, the clause that the directions of the Federal Government are binding on the Authority will also impact the role of the Authority. There will remain an apprehension that the Government will use the
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	<p>Qualification of other members</p> <ul style="list-style-type: none"> • A Journalist with not less than 10 years experience • A software engineer with not less than 10 years experience • An advocate having not less than 10 years of experience • A social media professional having 10 years of experience • A private sector IT entrepreneur <p>In terms of section 2E, the Federal Government has powers to remove Chairperson or members of the Authority</p> <p>Powers of Chairperson of the Authority</p> <ul style="list-style-type: none"> • In terms of section 2G, the Chairperson shall be CEO of the Authority • The decision of the Authority shall be taken with majority • The Chairperson shall have exclusive powers to issue directions for blocking of any unlawful online content or fake news. However, his decision will be subject to ratification by the Authority <p>Powers of the Federal Government</p> <p>In terms of section 2O of the recently approved Act, the Federal Government shall have powers to issue directions to the Authority on policy matters and such directions shall be binding.</p>	<p>is a mix of civil servants as well as professionals.</p> <ul style="list-style-type: none"> • The most important element of the new Authority is the “non-extendable” tenure of the Chairman and members. Thus, they will not be lured into dancing to the tunes of the political executive in order to get extension in their tenure. • It is positive point that a journalist will also be a member of the Authority. This will help in mitigating the apprehensions of the journalists that the recently approved Act is designed to silence their voices. • Though it is mentioned that the lawyer having ten years experience will be made member of 	<p>Authority to silence its critics. To enhance the strength of the Authority, it shall be made independent or it be made answerable to a Committee of the National Assembly instead of the Government.</p> <ul style="list-style-type: none"> • The process for appointment of journalist in not clarified. This leaves discretionary power with the Government to appoint its favourite on the Authority. To make this appointment impartial, this clause shall be modified for appointment with the consent of the Pakistan Federal Union of Journalists
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	<p>Enlistment of Social Media Platforms</p> <ul style="list-style-type: none"> • In terms of section 2Q, the Authority may require any social media platform to enlist itself • The authority may stipulate the conditions or requirements for such enlistment <p>Removal of online content</p> <p>In terms of Section 2R of the recently approved Act, the authority shall have powers to issue directions for removal of content of following type;</p> <ul style="list-style-type: none"> • Against the ideology of Pakistan; • Intimidating & inciting violence or religious hatred; • Containing obscene or pornographic material; • Is known to false or fake or there exists sufficient reasons to believe that the same may be false or fake; • Contains aspersions against any person including members of judiciary or parliament or armed forces or provincial assembly; • The portion of National Assembly or Senate proceedings declared by the Chair of the Session as expunged, shall not be on aired or reported. 	<p>the Authority, however, the field of his experience has not been specified.</p> <ul style="list-style-type: none"> • The Chairperson shall have exclusive powers to issue directions regarding removal of a content carrying fake news or disinformation subject to ratification from the Authority. • The clause prohibiting the Chairperson or members from engaging in media related business will avoid conflict of interest, thus, it is strength of the Authority. Furthermore, the Chairperson or members, on expiry of their tenure, shall not, for one year, seek employment is a clause to strengthen the Authority. 	<ul style="list-style-type: none"> • To enhance strength of the Authority, the Chairman's exclusive powers to issue directions for removal of content disseminating fake news or disinformation be converted into powers to be exercised by the Authority with consensus. In case the Authority does not ratify the decision of the Chairman, it will create an embarrassing situation. And in case, the Authority rubberstamps every decision of the Chairman then eyebrows will be raised on conduct of other members. So, like other decisions,
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		<ul style="list-style-type: none"> • In terms of section 2 N of the recently notified Act, the Authority is to submit its annual report regarding operations and finances to the National Assembly and the Senate of Pakistan is to ensure oversight of the Parliament. 	<p>this decision shall also be taken on the basis of majority.</p> <ul style="list-style-type: none"> • To enhance strength of the Authority, the Federal Government shall not have arbitrary powers to remove the Chairpers on or members of the Authority. There shall be security of the tenure. In case of premature removal, like Chairman NAB, Chief Election Commissioner or Judges of the Supreme Court or High Courts, there shall be an independent forum. By this way, the independence or impartiality of the Authority will increase.
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			<ul style="list-style-type: none">• To become member of the Authority, the lawyer shall have experience of dealing matters related to cybercrime or social media, thus, to enhance strength of the Authority, this clause shall be amended.• The clause regarding forbidding reporting of the National Assembly and Senate proceedings declared by the Chair as expunged, is inviting unnecessary criticism so same shall be deleted. The purpose of the proposed Act shall remain strictly to the extent of curbing fake news or disinformation or removal of unlawful content.
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<p>Social Media Complaint Council</p>	<p>In terms of section 2T of the Prevention of Electronic Crimes (Amendment) Act, 2025, the Federal Government shall constitute a Social Media Complaint Council.</p> <p>Composition</p> <ul style="list-style-type: none"> • It shall consist of a chairperson and four members including one ex-officio member. • The chairperson and members shall be appointed by the Federal Government for three (03) years further extendable for another similar term. • The chairperson and members shall be eminent professionals with at least fifteen (15) years of experience in information technology, law or social media policy. <p>Removal of Chairperson or Members</p> <p>The Federal Government shall have powers to remove the Chairperson or members of the Council</p>	<ul style="list-style-type: none"> • It will provide a forum to a person aggrieved of unlawful content of fake news or disinformation to lodge his or her complaint. • Prior to this, such Council of Complaint existed for Electronic Media under PEMRA Ordinance. • The tenure of chairperson and members have been defined but same is also extendable. 	<ul style="list-style-type: none"> • By removing the role of Federal Government in appointment of Chairpersons & members of the Council, its credibility can be increased. The appointment shall be through Parliamentary Committee having equal representation of opposition members and members of treasury benches. • Fixed and non-extendable will enhance the strength of the Council. The chairperson and members will act independently as there is no expectation of any favour from the government.
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			<ul style="list-style-type: none"> • The Federal Government shall not have powers to remove the Chairpersons or member of the Council.
<p>Social Media Protection Tribunal</p>	<ul style="list-style-type: none"> • In terms of section 2U of the Prevention of Electronic Crimes (Amendment) Act, in case of non implementation of any directions of the Authority by the Social Media Platform, it may approach the tribunal for appropriate action. • In terms of section 2 V of the Prevention of Electronic Crimes (Amendment) Act, 2025, the Federal Government shall establish as many Tribunals for the purpose of this Act as it determines. <p>Composition of the Tribunal</p> <ul style="list-style-type: none"> • The Chairman of the tribunal shall be a person who has been or is qualified to be judge of the High Court. • A journalist having not less than twelve years of experience. • A software engineer and an expert in the field of social media rights 	<ul style="list-style-type: none"> • A forum of adjudication has been provided. • The time limit for disposal of the case has fixed. • By appointing a person who has served or is eligible to become judge of the high court, better adjudication of cases will be achieved. • Journalists shall also have representation on the Tribunal. This will allay the apprehensions of the Journalists. • Inclusion of technical or professional member is a step in the right direction as he will give advice on technical matters. 	<ul style="list-style-type: none"> • The Federal Government shall not have powers to arbitrarily remove the chairperson of the Tribunal. By amending this clause to provide for some neutral forum to decide about removal of chairperson, the Social Media Tribunal can be strengthened. • The appointment of Chairpersons and members shall be in consultation with the Chief Justice of Pakistan, it will strengthen the

	<ul style="list-style-type: none"> Chairman & members to be appointed by the Federal Government for a period of three years <p>Removal</p> <ul style="list-style-type: none"> The Federal Government may remove the Chairperson or members of the Tribunal <p>Time Limit</p> <ul style="list-style-type: none"> The Tribunal shall decide the case within 90 days <p>Jurisdiction</p> <ul style="list-style-type: none"> Any individual aggrieved by the decision of the Authority shall also prefer an appeal before the Tribunal <p>Appeal against Tribunal</p> <ul style="list-style-type: none"> The appeal against the decisions of the Tribunal shall be preferred in the Supreme Court of Pakistan <p>Punishment for Fake News and Disinformation</p> <p>In terms of Section 26A of the proposed Act, anyone involved in dissemination of fake news or disinformation shall be punished for a sentence up to three (03) years or a fine to the tune of two (02) million or with both.</p>	<ul style="list-style-type: none"> Fake News or disinformation has been criminalised with three (03) years sentence and two (02) million fine. 	<p>Tribunal's autonomy.</p> <ul style="list-style-type: none"> Disposal of cases within a stipulated time can further be strengthened by adding that no adjournment shall be granted. Moreover, to avoid frivolous litigations, a clause shall be inserted empowering the Tribunal to put cost. Instead of criminalizing fake news or disinformation, it shall be dealt as civil offence having punishment of fines and damages.
<p>National Cyber Crime Investigation Agency</p>	<p>Through the Prevention of Electronic Crimes (Amendment) Act, 2025, the Federal Government shall establish an Investigation Agency to be called the National Cyber Crime Investigation Agency,</p>	<ul style="list-style-type: none"> A specialized agency to deal with social media related matters including fake news and 	<ul style="list-style-type: none"> The trained human resource of FIA shall be absorbed in the Agency. It will

	<p>Composition</p> <ul style="list-style-type: none"> • It shall be headed by Director General who shall be appointed by the Federal Government for three years. • He shall have powers of Inspector General. • For the purpose of inquiry and investigation, the officers of the agency shall have same powers as a police officer has under the Code of Criminal Procedure, 1890. • Cyber Crime Wing of FIA shall cease to exist. • It shall establish capacity of forensic analysis of data or in information systems. • The forensic reports generated by the agency have been declared admissible as evidence in the court. 	<p>disinformati on.</p> <ul style="list-style-type: none"> • As powers of search, seizure and raid are derived from the Code of Criminal Procedure Code, 1898, therefore, the same will vest in the officers of the agency. • Most important part is that the evidence collected by the agency through its forensic analysis has been declared admissible in the Court of Law. 	<p>enhance strength.</p> <ul style="list-style-type: none"> • For capacity building of officers, they shall be offered training in foreign countries dealing with this subject. • By appointing an aboveboard, honest and professional officer as head of the Authority, its strengths can be enhanced. • The Agency shall have the services of experts too.
<p>Ministry of Information & Broadcasting</p>	<ul style="list-style-type: none"> • Under Schedule II of the Rules of Business, 1973, administration of PTV, APP, PEMRA, PCP, PID come within its ambit. • Mouthpiece for informing public about government policies. • Issuing rebuttals to fake news & disinformation • Awareness campaigns to educate masses about fake news and disinformation. 	<ul style="list-style-type: none"> • Press conferences to counter fake news or disinformation. • Press release to issue correct facts or news story. • Running a fact check Twitter or X handle which quickly terms a news devoid of facts as Fake News. 	<ul style="list-style-type: none"> • Mostly fake news or disinformation is disseminated when the actual events are deliberately kept hidden from the public. And it is the job of Ministry of Information and Broadcasting to keep

	<ul style="list-style-type: none"> • Bridge between Governments and journalists. • Running fact-checking campaign through social media or electronic media. 	<ul style="list-style-type: none"> • A point of contact for the journalists or individuals for counter checking the facts before doing a story. • Trainings (The Express Tribune, 2024) 	<p>the general public updated on all happenings.</p> <ul style="list-style-type: none"> • By frequent use of Factcheck on social media platforms, the fake news can be curbed by the Ministry of Information and Broadcasting (Dawn Newspaper, 2018). • The Ministry can enhance its strength by organizing seminars and workshops in schools and universities to spread awareness about fake news or disinformation. As a large chunk of Pakistan's population consists of youngsters so they shall be taught to differentiate between fake news and authentic news.
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			<ul style="list-style-type: none"> • The Ministry shall impart trainings to the Journalists in collaboration with Pakistan Press Foundation, the Global Neighbourhood for Media Innovation, and the Centre for Excellence in Journalism (CEJ) at IBA-Karachi. • Ministry has a power to issue advertisements. It can use that power to encourage credible news and curb fake news or disinformation.
<p>Pakistan Electronic Media Regulatory Authority (PEMRA)</p>	<ul style="list-style-type: none"> • Section 2(ha) the PEMRA Ordinance, 2002 (Justice, The Pakistan Code, 2025) defines disinformation, it was inserted in 2023. • In terms of section 4 of the PEMRA Ordinance, 2002, it regulates operations of all 	<ul style="list-style-type: none"> • Issuing warnings to the TV Channels to follow code of conduct (Director General Operations, 2022). • Creating deterrence by Penalising 	<ul style="list-style-type: none"> • Strengths of PEMRA can be enhanced if it establishes the element of neutrality and credibility by proving that it is not a tool in the hand

	<p>broadcast medias and distribution services in Pakistan.</p> <ul style="list-style-type: none"> • In terms of section 20(j) of the PEMRA Ordinance, the terms and condition for issuing license include not to air disinformation. • Imposition of fines or cancellation of licenses. • Council of Complaints to deal with complaint of disinformation. • Rule 2(1)(a) of the Electronic Media Code of Conduct, 2015 (Broadcasting, 2025) defines Aspersion as spread of harmful and fake charges, Rule 3(1)(i) prohibits licensee from airing false comments and Rule 3(1)(l) prohibits airing of defamatory content. 	<p>TV Channels for on-airing fake news e.g. on 21st April, 2020, it imposed 1 million fine on Dawn News TV for telecasting fake news regarding death of UK's Prime Minister.</p> <ul style="list-style-type: none"> • Compelling TV Channels to tender apology for fake news or disinformation (Khan, 2019). 	<p>of political executive.</p> <ul style="list-style-type: none"> • Its legal wing needs to be revamped as most of the punitive measures taken by PEMRA are struck down by the Courts.
<p>Ministry of Information Technology & Telecommunication</p>	<ul style="list-style-type: none"> • Under Schedule II of the Rules of Business, 1973, promotion of IT applications, planning, policy making and legislation covering all aspects of telecommunication (Division, 2025). • Digital literacy • Initiative of Firewall • Internet & Technology within its preview 	<ul style="list-style-type: none"> • It oversees the implementation of Digital Pakistan Policy which aims at ensuring secure digital echo system of in the country. • It is exploring AI & Machine Learning tools to curb fake news and 	<ul style="list-style-type: none"> • Pakistan has only two fact-checking services at present that are signatories of the International Fact Checking Network (IFCN) and members of Facebook's third-party fact-checking

		<p>disinformati on.</p>	<p>program, and only one of these is purely local. These two fact- checking organizati ons are: AFP Fact Check Pakistan, which is part of the French news agency Agence France- Presse's global fact checking operations , and the local organizati on Soch Fact Check, which is independe ntly establishe d and operated by Pakistani fact- checkers. In compariso n, India has at least 14 IFCN signatory fact- checkers (Rehmat, Counterin g disinforma tion in Pakistan - Lessons and recommen</p>
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			<p>ditions for Digital Journalism, 2022).</p>
<p>Pakistan Telecommunication Authority</p>	<ul style="list-style-type: none"> • As per Section 2(h) of the Pakistan Telecommunication (Re-organization) Act, 1996. Authorization for establishment, maintenance and operation of telecommunication system is its responsibility. • Promotion of high-quality services is also its responsibility as per section 4(d) the Pakistan Telecommunication (Re-organization) Act, 1996. • In terms of section 6 of the Pakistan Telecommunication (Re-organization) Act, 1996, it is responsibility of the authority to protect interests of the users of the telecommunication services. • Removal of content containing Fake News or Disinformation. • Blocking of website or social media platform containing Fake News or disinformation. 	<ul style="list-style-type: none"> • Requests Social Media Platforms for removal of fake news/ disinformation. • Since January, the Pakistan Telecommunication Authority (PTA) has removed/ blocked over 44,000 social media accounts or posts from Facebook, Twitter and YouTube for spreading fake news. A total of 20,829 unlawful Facebook posts and accounts have been removed or blocked from the said platform by PTA. From YouTube, A total of 12,776 posts, videos or YouTube accounts have been blocked or removed by PTA during this time. Whereas from Twitter, a total of 	<ul style="list-style-type: none"> • Interagency collaboration will enhance PTA's strengths. • PTA shall have professionals on lead role in the organization.

		<p>10,813 twitter posts or accounts were blocked or completely removed from the platform during January 2023 till this date.</p> <ul style="list-style-type: none"> • However, no action against those who spread misinformation on social media. • Interestingly, a total of 61 posts based on fake news were made by an official account of a major political party in just one month- July 2024, data fetched by authorities unfolded. (Abbasi, 2024). 	
<p>Federal Investigation Agency</p>	<ul style="list-style-type: none"> • Registration of cases • Investigation against the individual disseminating Fake news or Disinformation or propagating unlawful content. 	<ul style="list-style-type: none"> • Cyber Crime Wing • Prosecutors to deal with cases in the Courts • Powers to Investigate • Assistance from Intelligence Agencies regarding data • Powers to raid places or take into 	<ul style="list-style-type: none"> • Federal Investigation Agency can enhance its strengths by capacity building of prosecutors. Most of the accused get acquitted because of insufficient evidence

		custody individuals for evidence collection	or the prosecutors fail to establish their case.
Editorial Boards	<ul style="list-style-type: none"> • Internal regulatory mechanism within Print or Electronic Media entities. • Responsibility of verifying or checking veracity of a news or content before publishing or on-airing any content. • If this tier is strong, less need of external monitoring or scrutiny. 	<ul style="list-style-type: none"> • System of internal accountability. • Publish rebuttals if proven that the news published is incorrect or fake. • Issue clarification in case some information is not properly presented. 	<ul style="list-style-type: none"> • Editorial Boards can enhance their strengths by introducing a system of punishment and rewards. The journalists whose news has been proven fake, shall be punished, while, the one whose news has a record of filing credible stories shall be rewarded. • Invest in fact checking resources.
Courts	<ul style="list-style-type: none"> • Punishing individuals, organizations or platforms responsible for fake news or disinformation. • Deciding defamation suits. 	<ul style="list-style-type: none"> • In Asma Shirazi Vs. Pemra Council of Complaints, the Islamabad High Court's Justice Mohsin Akhtar Kiyani passed an order directing 	<ul style="list-style-type: none"> • The Courts can enhance their strength by quick disposal of pending cases. If the courts are able to enforce the laws of libel and defamation, there

		<p>ARY News to broadcast an apology as well as pay Rs. 50,000 damages for airing fake news against Ms. Asma Shirazi by placing her picture wrongly with the news item (Guramani, 2023).</p> <ul style="list-style-type: none"> • The laws related to defamation, libel or fake news are enforced by the courts. • A check on government 's abuse of power. • Create deterrence against spread of fake news if sentences are awarded. 	<p>will be no need to criminalise the dissemination of fake news or disinformation.</p>
<p>Social Media Platforms</p>	<p>The Prevention of Electronic Crimes (Amendment) Act, 2025</p> <ul style="list-style-type: none"> • In terms of section 25 of the Prevention of Electronic Crimes (Amendment) Act, 2025, the social media platforms shall maintain an effective and transparent procedure for handling complaints about unlawful content including fake news. 	<ul style="list-style-type: none"> • Accountability of the content being aired or posted. • Authority to remove the content or block the proponent of that content. • Awareness & Digital Literacy. 	<ul style="list-style-type: none"> • Social Media Platforms shall introduce the concept of self regulation. • If on the comments section, most of the people are writing that the news is incorrect or fake,

	<ul style="list-style-type: none"> • In terms of section 2B of the Act, the Social media platforms shall enlist themselves with Social Media Protection and Regulatory Authority and if they do not comply with provisions of the Act, they will be blocked <p style="text-align: center;">Others</p> <ul style="list-style-type: none"> • Placing checks that information posted is correct and authentic. • Removing contents which are fake. • Blocking accounts or channels airing fake news or disinformation. 		<p>then the Platform shall have a policy to remove it.</p> <ul style="list-style-type: none"> • The accounts continuously spreading fake news or disinformation shall be blocked as per policy. This will increase the credibility of social media platforms. • In 2018 Facebook started one such project of fact checking in Pakistan prior to elections (The News International, 2018). • The Social Media Platforms shall spread awareness among users regarding fake news or disinformation (Techjuice, 2018)
<p>Inter Services Public Relations (ISPR)</p>	<ul style="list-style-type: none"> • Provision of information regarding Armed Forces. • Countering Fake news or 	<ul style="list-style-type: none"> • Press release to address fake news. • Posting correct facts 	<ul style="list-style-type: none"> • ISPR can enhance its strengths by collaborating with

	<p>disinformation regarding Armed Forces.</p> <ul style="list-style-type: none"> Awareness among masses through workshops and seminars. 	<p>on X (Twitter).</p> <ul style="list-style-type: none"> Visiting universities to educate students about fake news or disinformation. Workshops for Journalists. Monthly briefings for media to set the record straight. 	<p>other entities such as Ministry of Information & Broadcasting, PTA, FIA etc.</p> <ul style="list-style-type: none"> It shall dilute the perception that it controls media. It shall help other government entities in increasing digital literacy.
Organization	Weakness		Eliminate Weakness
<p>Social Media & Protection Regulatory Authority</p>	<ul style="list-style-type: none"> Chairperson and members are to be appointed by the Federal Government. Chairperson and members can be removed by the Federal Government. The definition of expression "aspersions" is vague, thus, the it can be used for political victimization. The task to enlist Social Media Platforms is ambitious and no description has been provided in the Prevention of Electronic Crimes (Amendment) Act, 2025 as how will the Authority force a platform to register or enlist. As it is difficult to enlist the Social Media Platforms, therefore, there is a genuine apprehension that the powers will be used against the customers or users of the Platforms. 		<ul style="list-style-type: none"> The Authority shall be made independent of the Government's control else it will be seen as a tool to silence critics. The clause regarding arbitrary removal of Chairpersons and members of the Authority shall be deleted. What measures will the Authority take to ensure enlistment of the

		social media platforms need to be explained in the Act.
Social Media Complaint Council	<ul style="list-style-type: none"> • Federal Government's powers to appoint and remove the chairperson and members of the Complaint Council make it subservient to the political executive. • The tenure of Chairperson or members is extendable which means they will be lured to act at the behest of the government for longevity of their jobs. • How will it enforce orders on the Social Media Platforms is unexplained. 	<ul style="list-style-type: none"> • The clause regarding tenure of Chairpers on and members of the Council shall be amended to make their term fixed and not extendable . By this way, they will not be seeking favours from the Governme nt by obliging it. • Unless the Social Media Platforms have offices in Pakistan, it is impossible to enforce orders against them.
Social Media Tribunal	<ul style="list-style-type: none"> • Too much discretion with the Government for appointment of the members of the Tribunal. • The appellate forum of High Courts is missing as the Act states that the appeal will be heard by the Supreme Court of Pakistan. • The law does not specify if the Tribunal enjoys the powers of the Civil Court or Criminal Court to conduct proceedings. • To criminalise dissemination of fake news or false information will end up in self censorship from the journalists 	<ul style="list-style-type: none"> • The appeal, at first instance, against the orders of the Tribunal shall lie to the concerned High Court. By doing this

	<p>which is inappropriate in a democracy. Moreover, there is an apprehension that the clause will be used to imprison or incarcerate the critics of the Government.</p>	<p>one remedial forum will increase. Moreover, the burden of cases on the Supreme Court of Pakistan will not increase.</p> <ul style="list-style-type: none"> • The Tribunal shall be given powers of Civil or Criminal Court so that it can summon witnesses and record statements . • Instead of imprisonment, more focus shall be on damages or fines against the perpetrators of fake news or disinformation.
<p>National Cyber Crime Investigation Agency</p>	<ul style="list-style-type: none"> • New agency with no trained Human Resource. • Recruiting quality human resource and their capacity building will take time. • Building its own forensic laboratory is an ambitious target in already constrained fiscal situation of Pakistan. • There will be tug of war between different occupational groups as who is going to become chairperson of the agency. • Apprehension exists that like FIA, it will also be used to target opponents and silence critics (Dawn Newspaper, 2025). 	<ul style="list-style-type: none"> • Scrutinizing the existing human resource of FIA Cyber Wing, after eliminating deadwood, rest shall be absorbed in the Agency. • All LEAs and IAs to

		<p>extend cooperation to the Agency in curbing fake news and disinformation.</p>
<p>Ministry of Information & Broadcasting</p>	<ul style="list-style-type: none"> • Nepotism and favouritism instead of hiring professionals and experts to handle the issue of fake news (Daily Ausaf, 2024). • Lacks credibility as public does not trust the official version, thus, they believe in fake news or disinformation. • Lack of focus on providing training to the Journalists and Public regarding Fake News & Disinformation (Dawn Newspaper, 2024). • Minimal presence on social media and undue reliance on traditional media. 	<ul style="list-style-type: none"> • Need to activate Fact Check up mechanism as is done in India and other European Countries e.g. A government-operated agency in India will now monitor and conduct fact-checks on social media regarding government-related topics. The Ministry of Electronics and IT announced the amendments to the IT Rules 2021 in a gazette notification dated 21 March 2024 (Mansab, 2024). • Hiring of professionals and experts who can

		<p>increase presence of government and ministry in the digital space.</p>
<p>Pakistan Electronic Media Regulatory Authority</p>	<ul style="list-style-type: none"> • PEMRA lacks credibility and is viewed as an authority who acts on the political behest of the government (Hussain, 2022). • Social media is out of its preview and most of the fake news or disinformation in on-aired through social media platforms. • No coordination with fact-checking organizations. • Unable to start campaigns for public awareness regarding fake news. • The decisions of PEMRA are often overturned by the High Courts and Supreme Court. 	<ul style="list-style-type: none"> • Improving quality of human resource in legal wing as most of the decisions are nullified in the Court of Law. • Strengthening Council of Complaints.
<p>Ministry of Information Technology</p>	<ul style="list-style-type: none"> • In order to eliminate fake news or disinformation, the strategies, such as internet slow-down, blocking social media platforms or installation of firewall, adopted by the Ministry of Information Technology and Telecommunication have repercussions on the economy. Top10VPN.com’s report revealed that due internet shutdowns, Pakistan’s economy suffered highest losses to the tune of \$ 1.6 billion. Such tactics are not proving helpful in deterring spread of fake news or disinformation but have serious consequences for freelancers, the individuals and companies whose work or business is dependent on internet. 	<ul style="list-style-type: none"> • The Ministry shall, instead of shutting down internet, introduce fact-checking twitter handles or increase digital literacy so that fake news or disinformation can be countered. • It shall engage tech companies to find solutions to curb fake news with the help of AI.

<p>Pakistan Telecommunication Authority</p>	<ul style="list-style-type: none"> PTA has the ability to block a social media platform or remove content from a social media platform, however, if a fake news or disinformation is spread through WhatsApp or signal or telegram then no such mechanism exists to counter that. 	<ul style="list-style-type: none"> PTA shall, like it does with other social media platforms, engage with Whatsapp or Telegram etc. to counter spread of fake news or disinformation. WhatsApp was used to spread fake news in India too. However, the Indian authorities engaged with Whatsapp management and with mutual collaboration, limits on message forwarding was introduced. Moreover, whatsapp helped Indian authorities in launching awareness campaigns to teach users as how to identify fake news or disinforma
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		<p>tion. Moreover, the Indian authorities employed machine learning to detect and ban accounts involved spreading fake news.</p>
<p>Federal Investigation Agency</p>	<ul style="list-style-type: none"> • Lower number of convictions • Mishandling of evidence • Accused get acquitted due to nonprofessional prosecution • The conviction rate in cybercrime cases over the past five years remained below 5 per cent, with only a minuscule proportion of Pakistan’s mobile and internet users reporting digital crimes to authorities. According to a written reply submitted by the interior ministry to the National Assembly, since the year 2020, 7,020 accused have been arrested on cybercrime charges, with only 222 being convicted – a conviction rate of only 3.16pc (Ali K. , Dawn Newspaper, 2025). 	<ul style="list-style-type: none"> • Improving prosecution of cases in the courts. • Resolving the issue of admissibility of evidence by introducing amendments in Qanoon-e-Shahdat. • Eliminating favouritism while appointing prosecutors. • The Prevention of Electronic Crimes (Amendment), Act, 2025 proposes abolishment of FIA Cyber Crimes Wing on establishment of NCCIA.
<p>Courts</p>	<ul style="list-style-type: none"> • Inability to enforce Laws of Defamation and Libel 	<ul style="list-style-type: none"> • The Laws of defamation

	<ul style="list-style-type: none"> • No punishment awarded to the people disseminating Fake News or Disinformation • Even Courts are itself victim of Fake News and Disinformation e.g. clarification of the Supreme Court in Mubarak Sani’s case. 	<p>n and libel shall be enforced on the pattern of western countries e.g. the UK Defamation Act, 1996. A lot of Pakistani Nationals have won cases in UK but none in Pakistan e.g. Gul Bukhari, Ishaq Dar against ARY. (The Friday Times, 2022).</p> <ul style="list-style-type: none"> • The disposal of cases related to defamation or libel shall be made time bound.
<p>Editorial Boards</p>	<ul style="list-style-type: none"> • They are reactionary instead of being proactive. • Swayed by the concept of ratings or viewership. • Lost credibility due to commercialism. • News is not verified from multiple sources. • Social Media does not have any editorial boards. 	<ul style="list-style-type: none"> • The Editorial Boards shall ask their organizations to provide fact checking training to all journalists as well as board members. • A study by Freedom Network and Digital Media

		<p>Alliance of Pakistan (DigiMAP), with support from IMS, unfolded that journalistic and factchecking disinformation responses in the country have struggled due to lack of conceptual understanding of disinformation among journalists, monetisation trends that incentivise sensationalist news and reduce the impact of capacity building initiatives, lack of financial sustainability of responses, language barriers and political backlash (Rehmat, Countering Disinformation in Pakistan - Lessons and Recomm</p>
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		ndations for Digital Journalism , 2022)
Social Media Platforms	<ul style="list-style-type: none"> • Commercial interests prevail over measures to curb fake news. • In the garb of freedom speech, fake news is promoted. 	<ul style="list-style-type: none"> • Social media platforms shall add a fact checking feature so that fake news or disinformation is effectively countered. • A data base shall be maintained of accounts frequently involved in fake news or unlawful content.
Inter Services Public Relations	<ul style="list-style-type: none"> • It sees everything with a lens of national security, thus, ends up curtailing or manoeuvring the flow of information. • There is a perception that it has a role to play in contributing fake news or disinformation particularly in political domain (Shaheen, 2022). • Most of the news related to security matters is deliberately kept hidden from public discourse, thus, generating fake news or speculation. 	<ul style="list-style-type: none"> • It shall not securitize the matter of disinformation or fake news. • It shall aid the freedom of expression or information shall be ensured but with responsibility. It will improve public perception of ISPR.
Organization	Opportunities	Taking advantage of opportunities

<p>Social Media & Protection Regulatory Authority</p>	<ul style="list-style-type: none"> • The Authority’s one function is to impart training and organize workshops to spread awareness about fake news or disinformation. This shall be taken as an opportunity as this aspect was still unattended in Pakistan. • Social Media platforms were unregulated in Pakistan due to non-existence of any law dealing with them. Now the Authority has been given mandate to enlist the Social Media Platforms. It is an opportunity which Pakistan can capitalize upon. • Th Authority has been given mandate to enter into agreements with its counterparts or other international agencies with regard to capacity building or learning or training regarding dealing with fake News or disinformation. 	<ul style="list-style-type: none"> • The first and foremost important thing is to appoint person of unimpeachable integrity and repute as the Chairpers on of the Authority. This will enhance public at large’s trust in the Authority. • The social media shall be regulated in a way that it does not hurt the freedom of press or expression • The Authority shall engage with International Factchecking Network and request them to impart trainings to Pakistan based journalists. • The Authority shall open its factchecking account on face book,
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		twitter (X), Tik Tok etc. so that fake news or disinformation can immediately be countered.
Social Media Complaint Council	<ul style="list-style-type: none"> • There was no specific council dealing with complaints regarding social media. PEMRA Council of Complaints was only meant for Electronic Media. So, the Council, under the newly enacted Act provides a forum to the aggrieved party to lodge complaint against the Social Media Platforms as well as accounts spreading false or fake news. • The Council's composition is blend of professionals as well as civil servants, thus, this opportunity shall be utilized by appointing impartial, honest and credible individuals. • The Council has been given ample powers. 	<ul style="list-style-type: none"> • The Complaints against any handle or account regarding dissemination of fake news or disinformation shall be heard as per due process of law. The accused shall be given proper hearing. This will help the Authority dispel the impression that it is a tool in the hand of the government to muzzle critical voices. • Persons of impeccable integrity and repute be chosen as members of the Council.
Social Media Tribunal	<ul style="list-style-type: none"> • The Social media tribunal provides an opportunity to create deterrence 	<ul style="list-style-type: none"> • As the time period is

	<p>against the unabated spread of fake news or disinformation.</p> <ul style="list-style-type: none"> • The imposition of time limit of ninety (90) days for the disposal of case provides an opportunity for quick justice. 	<p>provided for the disposal of the case, the Tribunal shall strictly abide by that. Normally, laws do provide timelines for disposal of cases, however, due to workload as well as noncooperation of legal fraternity, the cases cannot be decided on time, thus, forums lose vitality. For this, the law shall be amended to empower the Tribunal to put cost if someone is found using delaying tactics or filing frivolous petitions.</p>
<p>National Cyber Crime Investigation Agency</p>	<ul style="list-style-type: none"> • As FIA was busy dealing with cases of multifarious nature, so, it was not possible for it to give due attention to the issue of fake News or disinformation. However, this new agency, under the newly enacted Act, provides an opportunity to mitigate the risks posed by the spread or 	<ul style="list-style-type: none"> • Be it FIA or Police, they fail to establish their cases before the tribunals or courts of law

	<p>dissemination of fake news or disinformation.</p> <ul style="list-style-type: none">• Though, recruitment of human resource for the new agency will be a herculean task but if it is done honestly and competent human resource is recruited, it will provide an opportunity to the agency to function well and achieve its goal.	<p>because of insufficient evidence and flawed prosecution. The National Cyber Crime Investigation Agency faces the same challenge. It can deliver if the human resource, at first instance, is recruited on merit, without political influence, and thereafter, the human resource is trained in evidence collection as well as presenting the same before the courts. For that the Authority shall hire services of experts to impart training to its human resource.</p> <ul style="list-style-type: none">• The training regime developed for the agency shall also focus on public dealing as well.
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		<p>Courteous attitude in public dealing will inspire trust and respect.</p>
<p>Ministry of Information & Broadcasting</p>	<ul style="list-style-type: none"> • Ministry of Information and Broadcasting shall launch awareness campaign and impart trainings regarding fact checking for journalists. • Moreover, it shall address to the apprehensions of the journalists by explaining them that the new law is more about curbing fake news and disinformation and not about crackdown against journalists. 	<ul style="list-style-type: none"> • Ministry of Information & Broadcasting shall persuade the media houses to impart fact-checking trainings to their beat reporters. • The Ministry shall engage journalists and their associations to assure them the law will not be used as coercive measure but its purpose is to deal with fake news or disinformation alone. • Ministry of Information & Broadcasting shall take lead in countering this narrative that the new legislation is aimed to

		<p>target government's critics. One way to achieve this objective is to appoint credible journalists in the social media Regulatory Authority, Complaint Council and other forums.</p>
<p>Pakistan Electronic Media Regulatory Authority</p>	<ul style="list-style-type: none"> • Prior to 2023, the PEMRA law didn't provide definition of fake news or disinformation, thus, it was not in a position to take any action. However, in 2023, through an amendment, the fake news or disinformation was defined but it still could not take any action as social media was not in its ambit. • Now PEMRA can engage with the Social Media Regulatory Authority to take action against fake news or disinformation on social media and electronic media. 	<ul style="list-style-type: none"> • PEMRA shall engage with media owners to ensure that they have fact-checking accounts wherein immediate response is provided to fake news. Some channels e.g. Geo News and Samaa News do run such fact checking accounts. Others shall also be convinced to start doing this. • Moreover, the Channels shall start a process

		of self accountability too. The journalists who are found to be involved in spreading fake news or disinformation shall be taken to task by the organization itself.
Ministry of Information Technology	<ul style="list-style-type: none"> • Provision of internet is the mandate of the Ministry and Internet Service Providers come within its ambit. It is the Ministry's responsibility to increase digital literacy so that the general public is able to differentiate, on social media, between fake news or disinformation and authentic news. • Secondly, the Ministry shall, utilizing the PECA (Amendment) Act, 2025, enter into training and technology related agreements or MoUs with other countries who have successfully dealt with information disorder or information pollution. • Ministry of Information & Technology has made a lot of efforts, in the past, to bring social media platforms to Pakistan. However, it could not succeed. Now, the recently enacted law has a provision for enlistment of social media platforms. Thus, there is an opportunity for the Ministry to push social media platforms to open offices in Pakistan. • Pakistan suffered losses to the tune of \$1.62 Billion due to internet and social media outages (Ahmad, 2025). This has earned a lot of bad name and criticism to the Ministry as there was no legal backing to support the actions. 	<ul style="list-style-type: none"> • The Ministry shall engage with Facebook, Twitter, Tik Tok, Whatsapp etc. to start digital literacy initiatives in Pakistan like other countries (Counterin g Disinform ation, 2021). • The Ministry should realise that slowing internet or blocking social media platforms is not helping.
Pakistan Telecommunication Authority	<ul style="list-style-type: none"> • The Pakistan Telecommunication Authority, in 2022, issued a booklet containing guidelines for social media 	<ul style="list-style-type: none"> • The Pakistan Telecommunication

	<p>security. Its amended version be issued and publicized.</p> <ul style="list-style-type: none"> • It shall strictly enforce “the Removal and blocking of unlawful Online content (Procedure, oversight and safeguards) Rules, 2021. • It can collaborate with fact checking organizations such as Digital Rights Foundation and Soch fact to counter misinformation or fake news. • In September, 2023, PTA signed an MoU with Tik Tok to promote digital literacy and safety in schools across the country (Obaid, 2023). • The Pakistan Telecommunication Authority with the cooperation of Tik Tok launched a “Digital Hifazat Contest”. The purpose of this initiative is to increase awareness in the youth. Such initiatives can also be used to educate the youth about fake news or disinformation too (Dawn News, 2024). 	<p>Authority shall arrange campaigns with the help of social media platforms to create awareness among the general public about fake news and disinformation.</p> <ul style="list-style-type: none"> • Awareness will help people understand that every news on social media or any other form of media is not correct unless corroborated, secondly, every news shared on the whatsapp or social media platform is not to be forwarded without verification. • The Pakistan Telecommunication Authority should propagate through radio and tv as what
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		is Islamic perspective on fake news or disinformation.
Federal Investigation Agency	<ul style="list-style-type: none"> As the subject of fake news or disinformation will, henceforth, be dealt by new agency, thus, it provides an opportunity to the Federal Investigation Agency to share its understanding, knowledge and expertise with it so that fake news or disinformation is dealt effectively. 	<ul style="list-style-type: none"> The officials of cyber crime wing and prosecutors shall share their experience and expertise with the officials of the Social Media Regulatory Authority. This will help in understanding the challenges faced during investigation and prosecution.
Courts	<ul style="list-style-type: none"> The PECA (Amendment) Act, 2025, provides for the specialized Tribunal to deal with cases related to the unlawful content or disinformation and fake news. The time period, for disposal of the complaint, has been fixed as ninety (90) days. It will lessen the burden of cases on the courts. However, the courts shall focus on deciding cases related to libel and defamation. If the defamation cases are decided on merit and at the earliest, there will be no need to criminalize fake news or disinformation. 	As the new forum has been created to deal with the cases under the PECA Act, the Courts shall divert its energies on deciding the pending cases of civil nature with respect to fake news or disinformation e.g. cases of defamation and libel. In all developed countries, the spread of fake news or disinformation

		is difficult because there is a threat of damages (Bennett-Jones, 2016).
Editorial Boards	<ul style="list-style-type: none"> • Confirmation from multiple sources before publication of stories. • The Editorial Boards shall establish a section wherein corrections and clarifications are marked. This will not only check fake news but also provide data regarding misinformation so that reasons can be traced and analyzed. • Penalty for intentional spreading fake news or disinformation. • For live telecast, the PEMRA guidelines regarding the time interval shall be strictly adhered to. 	A policy of self-regulation and correction. Improving the filters before a story is published or a news in on-air.
Social Media Platforms	<ul style="list-style-type: none"> • Collaboration with Pakistan authorities to curb dissemination of fake news or disinformation. It will also enhance credibility of the social media platforms that they are not contributing to social unrest or violence or disorder which comes as consequence of fake news. • The PECA (Amendment) Act, 2025 provides for a provision to enlist the social media platforms. It is an opportunity for the platforms to open offices in Pakistan. 	<ul style="list-style-type: none"> • The Social Media Platforms shall, by use of AI, establish a filter against the fake news or disinformation. • The proponents of fake news or disinformation get encouraged when despite complaints, there accounts remain active. The Social Media Platform shall suspend such accounts permanently. • Creation of dummy or fake

		<p>accounts and using them for spreading fake news is a problem. The social media platform shall develop some policy to plug this loophole.</p>
<p>ISPR</p>	<ul style="list-style-type: none"> • Rs. 2 billion has recently been approved by the Economic Coordination Committee for ISPR to curb fake news or disinformation regarding state institutions. It provides an opportunity to ISPR to utilize this money appropriately to curb fake news or disinformation. • The recent initiative of ISPR to engage university students is a step in the right direction. 	<ul style="list-style-type: none"> • The ISPR shall hire experts to make a soft strategy to deal with fake news or disinformation. • The law does provide for three (3) years sentence but it will also trigger a reaction in the form of protests from journalists and human rights organizations. The better way is to develop soft strategy i.e. factchecking initiatives, increasing digital literacy,

		imparting trainings to the journalists and, like some countries, introducing skills to differentiate between fake news and authentic news in the schools' curriculum.
Organizations	Threats	Hedging against the threats
Ministries of Information & Broadcasting and Information Technology & Telecommunication	<ul style="list-style-type: none"> The Ministries have not been able to curb fake news and disinformation, therefore, the government has enacted the Prevention of Electronic Crimes (Amendment) Act, 2025. The abysmal performance of the Ministries itself is the biggest threat to their existence. The Ministry of Information and Technology with the support of some government organizations installed firewall project, however, due to that project, Pakistan is witnessing frequent outages of internet. These outages or slow speed of the Internet is a threat to the economy in general and to freelancers and Information Technology Sector in particular. Ministry of Information and Broadcasting's could not play an effective role to develop a consensus among journalistic bodies for a legislation to curb fake news. Due to this reason, the PECA (Amendment) Act, 2025 is receiving huge criticism. Even international bodies such as Amnesty International are critical of the new legislation (Amnesty International, 2025). This local and international criticism is a threat to the new strategy to counter fake news or disinformation, 	<p>The Ministries of Information & Broadcasting and IT & Telecommunication shall adopt for following techniques;</p> <ol style="list-style-type: none"> Use of Natural Language Processing Machine Learning Tools Network Analysis Fact-Checking with AI Semantic Analy

		sis Tools
<p>Social Media Protection & Regulatory Authority, Social Media Complaint Council and National Cyber Crime Investigation Agency</p>	<p>Political Threats All the three forums are creation of the Prevention of Electronic Crimes (Amendment) Act, 2025. The Act has been passed by the Government without developing consensus among all political parties (Chaudry, 2025). For this reason, the opposition parties have expressed strong concerns on this legislation. Thus, the threat to these forums is their longevity. Any new government can abolish these forums by introducing amendments. Secondly, the local and international media community is strongly criticizing these forums, thus, developing a public opinion that the PECA (Amendment), 2025 is less about curbing fake news or disinformation and more about silencing and punishing critical voices.</p> <p>Legal Threats As these forums have been created without developing a consensus, therefore, there is a threat that the associations and bodies of journalists, civil society and political parties approach the High Courts and Supreme Court. A single restraining order from any court will throw spanner in the wheel. Thus, these forums face legal threats too.</p> <p>Institutional Threats The forums introduced by the new amendments are new. They do not have experienced manpower. For instance, National Cyber Crime Investigation Agency will recruit new human resource. Thereafter, training will be imparted to the newly recruited officials. This will take considerable time. On the other hand, the targets set for the agency are ambitious. As the Cyber Crime Wing of the Federal Investigation Agency has also been abolished, therefore, those officials will also attempt that the agency does not succeed in achieving its goals. The amendments vest controlling powers in the federal government in appointment and removal, which will damage the credibility and impartiality of all these forums.</p> <p>Narrative Threats</p>	<p>Political & Legal Fronts On political front, the only option is to develop the consensus between all parties. Though, these forums have been created but the government shall form a Parliamentary Committee consisting of members from all political parties with terms of reference to propose amendments. Such consensus-based document will ensure creation of permanent institutions. On legal front, the Ministry of Law & Justice and Attorney General Office shall vigorously contest the cases against the PECA (Amendment) Act, 2025 in the Courts and explain as why these forums were required.</p> <p>Institutional & Narrative Threats</p> <ul style="list-style-type: none"> • The officials of integrity,

	<p>A narrative has been coined that the new forums are politically motivated. As the government is unable to counter narrative a political party, therefore, it has established all these forums, so that, in the garb of curbing fake news or disinformation, the social media activists of that political party will be targeted. The journalists have built a narrative that the forums have been created to curtail the freedom of press and punish those media persons who do not toe the line of the government.</p>	<p>repute and competence in the FIA Cyber Crime Wing be merged into the New Agency.</p> <ul style="list-style-type: none"> • The Chairpersons and members of the forums shall be such persons who invite confidence of media, civil society as well as opposition . The government shall avoid appointing compromised or biased persons in these forums. Appointment of credible persons will counter all propaganda. • Ministry of Information & Broadcasting shall counter the narrative by explaining that the forums are not against
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		the press freedom or to silence journalists.
Social Media Tribunal	<p>Legal Threat The tribunal faces following legal threats; firstly a parallel court has been created, secondly, the appointment, like in other tribunals, in the tribunal is not with the consultation of the judiciary and thirdly, high court has been removed from being appellate body. Forgoing in view, the Supreme Court or High Courts will intervene to review the creation of the Tribunal</p> <p>Narrative Threat As a perception has already been developed that the PECA (Amendment), 2025 and the forums, created therein, are politically motivated, therefore, the Tribunal, even prior to its inception, faces a credibility and legitimacy threat.</p>	<ul style="list-style-type: none"> • The law shall be amended to incorporate the concerned High Court as the first appellate forum. • Moreover, there shall be a code of conduct for members of the Social Media Tribunal. • Lastly, in a highly politically charged environment, it will be in the Government's interest to appoint chairperson and members of the Tribunal in consultation with the Chief Justice of Pakistan.
Social Media Platforms	<p>Threat from Government The social media platforms face threats of the government's coercion to remove a content or block the accounts. They will be compelled to enlist themselves with the Social Media Protection & Regulatory Authority.</p> <p>Threats of Fines / Penalties There is a threat of penalty / fines. There is a threat that the platforms, in order to</p>	<ul style="list-style-type: none"> • The Social Media Platforms shall, in coordination with Pakistan's authorities, develop such tools

	<p>survive, will have to compromise on their policy of ensuring freedom of expression.</p>	<p>wherein the fake news or disinformation is filtered.</p> <ul style="list-style-type: none">• The accounts involved in disseminating fake news or disinformation shall be blocked.• It has been observed that a lot of fake accounts, in the name of prominent personalities, are being operated. For example, a prominent journalist Ayaz Amir has, on several occasions, denied that he does not have an account on X or Twitter, nevertheless, an account on his name is, continuously, spreading fake news or disinformation.
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<p>Editorial Boards</p>	<p>Threat of Censorship The editorial boards face a threat of self-censorship to avoid prosecution and punishment under the PECA (Amendment) Act, 2025. They will be pushed to follow the government’s policy.</p>	<ul style="list-style-type: none"> • In order to avert the threat of punishment or incarceration, the Editorial Boards shall introduce strong controls to filter fake news or disinformation. • The Editorial Boards of media houses shall also include a person having legal background.
<p>Pakistan Telecommunication Authority & Federal Investigation Agency</p>	<p>The PTA and FIA are facing existential threats as their role has been minimized with the introduction of the Prevention of Electronic Crime (Amendments) Act, 2025. Now the lead role will be assumed by the Social Media Protection & Regulatory Authority and National Cyber Crime Investigation Agency. The government has already decided to dissolve the Cyber Crime Wing of the FIA.</p>	<p>FIA & PTA shall extend assistance to the new forums by sharing their experiences and strategies. They shall share the reasons of their failure to curb fake news or disinformation so that the new forums shall learn.</p>

Legal Analysis

The Prevention of Electronic Crimes (Amendment) Act, 2025

On January 29th, 2025 the federal government, after approval from both houses of the Parliament and assent of the President, notified the Prevention of Electronic Crimes Act, 2025.

In the definition clause of the Act, the expression “aspersions” has been defined as spreading false information which damages reputation of any person. The definition of expression “aspersion” is too vague and does not cater for fake news or disinformation alone. The reputation of a person can be hurt by an authentic or credible news too. For instance, the news story on Panama Leaks hurt the reputation of the former Prime Minister and his family, so, will that be covered under the expression “aspersions”? Similarly, the news story mentioning names of the political personalities and officers who have taken gifts from foreign dignitaries, under the Tosha Khana rules, may be damaging for the reputation of those persons but same is correct as per the Cabinet Division’s record so will that also come under the definition of the expression “aspersions”? The editorials or opinions published in the newspapers explaining that certain institutions are acting beyond their legal mandate may hurt their reputation but if same is factually correct then how will that be covered by the expression “aspersions”?

The Social Media Protection and Regulatory Authority conceived by the PECA (Amendment) Act, 2025 suffers from lack of autonomy and independence as the powers to appoint the Chairperson and members rest with the Federal Government. Moreover, the Federal Government has been empowered to remove the Chairperson and members. Furthermore, the Federal Government also has the powers to issue policy directions and those directions will be binding on the Authority. The Chairperson has been given dictatorial powers regarding issuance directions for removal of content within twenty-four (24) hours and later seek the confirmation of the other members of Authority. How will he reach to the conclusion within twenty-four (24) hours, without a formal inquiry, as whether an information is fake or otherwise, has not been explained in the law. The task of enlistment of the Social Media Platforms is a step forward in the right direction, however, no mechanism has been explained as how will the Authority implement it. The Authority has been empowered to issue directions to the Social Media Platforms regarding removal of the contents, however, how will it enforce the directions has not been explained in the Act. Moreover, there is a duplicity as the same role is also performed by the Pakistan Telecommunication Authority under the Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards) Rules, 2020. The enlistment also means localization of data storage which may have the consequences that the government authorities, with or without warrants from the court, can seize the data of individuals by raiding the offices of the social media platforms. The provision of enlistment of the Social Media Platforms was also envisaged in previous laws too, however, it never got implemented. For instance, in terms of rule 5 of the Citizens Protection (against online harm) Rules, 2020 (Telecommunication, 2020), the Social Media Platforms were directed to register with the Authority, establish permanent office in Pakistan and appoint a local representative within three (03) months, however, this could not be implemented. Similarly, in terms of rule 6 read with rule 7 of the rules *ibid*, the Social Media Platforms were bound to share information with Pakistan Authorities and in case they failure to do so, they shall be banned. However, nothing could be done. In the Rules *ibid*. office of National Coordinator was also envisaged.

Another entity envisaged under the Prevention of Electronic Crimes (Amendment) Act, 2025 is the Social Media Complaint Council.

The Council also suffers from lack of autonomy as the Chairperson and members will be appointed by the Federal Government. Similarly, the Federal Government has the powers to remove the Chairperson or members. Moreover, the law provides that the Chairperson or members of the Council, after finishing their tenure, can be appointed for a similar term. This clause makes the Chairperson and members susceptible to appealing the government under expectation of extension in tenure.

The Prevention of Electronic Crimes (Amendment) Act, 2025 also mentions establishment of the Social Media Protection Tribunals. The Federal Government, again, is empowered to appoint and remove the Chairperson and members of the Tribunal which will have serious implications on the working of the Tribunals. The law provides that the Tribunals have to decide cases within ninety (90) days which is a positive aspect of the new legislation. However, for appointing chairperson and members of the Tribunal, the concept of consultation with the Chief Justice of Pakistan, has been ignored. Even for appointment of members, who are serving officers of Inland Revenue Service, in Appellate Tribunals Inland Revenue, the Ministry of Law and Justice consults the Chief Justice of Pakistan and same is the case with other tribunals. Furthermore, the law has removed the jurisdiction of the concerned high courts to review the decisions of the Tribunal as the Supreme Court has been mentioned as the Appellate Authority. This may invite further controversy for the Supreme Court of Pakistan as the critics will propagate that the Constitutional Bench of the Supreme Court is deliberately made appellate forum. There is no mention in the Act as if the Tribunal enjoys the powers of Civil or Criminal Court for the purpose of conducting its proceedings.

The Act has prescribed up to three years sentence or up to two (02) million fine or both for spreading aspersions or unlawful content. The criminalizing fake news or disinformation or unlawful content will have various impacts; firstly, it will suppress freedom of expression, secondly, critical voices will be prosecuted, thirdly, it will increase self-censorship and lastly, on failure to prosecute social media platforms, due to their strength and influence, ultimately, the users of platforms will face the wrath of authorities.

The portion of the Act that prohibits broadcasting the proceedings of National Assembly and Senate declared by the Chair to be expunged, is superfluous. Lastly, the Act proposes for establishment of National Cyber Crime Investigation Agency to be headed by the Director General. As soon as this Agency comes into existence, the Cyber Crime Wing will be abolished. Moreover, the Federal Government has been vested with the powers to appoint the Director General of the Agency for a non-extendable period of three (03) years. However, there is no explanation, so far, from the Government as how will the new agency be more effective than FIA & PTA to curb fake news and disinformation. If any diagnostic analysis has been carried out to study the defects in the working of FIA or PTA, same has not been shared. The Agency has been empowered to create its own digital forensic laboratory and its reports have been given legal protection. It is a positive aspect of this law. However, no punishment has prescribed in the law if any officer or official of the agency is found misusing his powers.

The Punjab Defamation Act, 2024

The Punjab Government, in May 2024, notified the Punjab Defamation Act, 2024 (Punjab, 2024) wherein the defamation caused by fake news or disinformation has been termed as a civil wrong and the aggrieved person is provided with a remedy to file suit for damages before a Tribunal to be constituted under the Act. One strength of this Act is that the Tribunal is to be constituted by the Punjab government in consultation with the Chief Justice of the Lahore High Court. Another strength is that the Tribunal is to decide the case within one hundred and eighty (180) days. Moreover, the government is empowered to constitute as many Tribunals as it deems appropriate. The aggrieved party can file appeal in the Lahore High Court against the decision of the Tribunal. The chairperson of the Tribunal cannot be removed without prior consultation of the Chief Justice of the Lahore High Court. The Tribunal has been given powers to direct the defendant to tender unconditional apology, publish the same from his social media handle or account and also direct the concerned regulatory authority to block the account. The Tribunal has been vested with powers to order punitive damages against frivolous complaints. For the purpose of proceedings under this Act, the Tribunal has been conferred powers of the Civil Court. The Lahore High Court has been provided as an Appellate forum.

Shortcomings of the Act

There are certain deficiencies in this Act. The first and foremost shortcoming is that the law has been passed without consultation of the stakeholders i.e. Journalists and opposition parties (Tariq, 2024). Secondly, the clause related to reviewing the performance of the Tribunal, after eighteen months, by the Review Committee is against the principal of judicial autonomy and independence. Thirdly, in terms of section 13 of the Act, if a case has been instituted by an aggrieved party and summons have been served on the defendant, the defendant will not be able to defend his case unless a leave to defend is granted by the Tribunal. In case, the defendant is unable to get leave to defend, it will be considered that allegations against him are proven or established. The Tribunal, in this scenario, shall pass preliminary decree for general damages against the defendant. After the preliminary decree, the Tribunal shall fix the case again to know whether the claimant wants to pursue a case for further damages, up and above the general damages already awarded in his favor. In case the claimant is interested in pursuing the case for further damages, the Tribunal shall proceed with the case and decide the matter. This provision of the Act is conflicting with the fundamental principle of due process of law, principle of *audi alterem partem* as well as article 4, 8 and 25 of the Constitution of the Islamic Republic of Pakistan. Further, this creates apprehensions in journalists and social media activists that the intention of the legislation is to screw them. Section 17 of the Act is also anomalous as it states that the Claimant needs not to prove his reputation rather it shall be sufficient if he proves any damage, over and above the general damages to his reputation. As per section 23 of the Act, Qanoon-e-Sahadat shall not apply on the proceedings before the Tribunal. In such scenario, how will the evidence be recorded and examined? Another discriminatory provision of this law is affording exclusive facility to the Constitutional Office holders to appear through their attorneys or councils, while, common litigants need to appear in person.

The Constitution office holders, for the purpose of this Act, have been defined as the President, the Prime Minister, the Chief Justice of Pakistan, Speaker of Provincial Assemblies etc. This question remains unanswered as how a provincial statute extends remedies for Speakers of other provincial assemblies as well as office bearers of the Federal Government. The act tries to curtail fair comment on the proceedings pending before the tribunal by imposing fine up to Rs. 50, 000 on any person doing so. The media outlets, civil society members, human rights organizations and political parties termed this law as an attempt to control free press and freedom of speech (Ali K. , Dawn Newspaper, 2024).

The Pakistan Electronic Media Regulatory Authority (Amendment) Act, 2023

The Pakistan Electronic Media Regulatory Authority (Amendment) Act, 2023 was notified by the Federal Government, after passage from both houses of the Parliament and assent of the President, on 17th August, 2023. Earlier, the PEMRA Ordinance did not provide definition of disinformation or fake news. By this Act, the disinformation was defined as verifiable false, misleading, manipulated, created or fabricated information which is disseminated or shared with the intention to cause harm to the reputation of or to harass any person for political, personal, or financial interest or gains without making an effort to get other person's point of view or not giving it proper coverage and space but does not include misinformation (Tahir Hussain, 2023). Similarly, the term misinformation has been defined as verifiable false content or information that is unintentionally disseminated or shared. By this Act, the process for appointment of Chairman PEMRA was made more transparent i.e. through a Parliamentary Committee having equal representation of the Government and Opposition. The Ministry of Information and Broadcasting was made responsible for sending a panel of five eligible candidates to a Parliamentary Committee consisting of four members, two from the National Assembly and two from the Senate.

Establishment Division's Office Memorandum dated 2nd September, 2024

On September 2nd, 2024, the Establishment Division, Government of Pakistan issued an office memorandum no. F. No. 14/3/2022-D-II on the subject Use of Social Media Platforms by the Government Servants (Establishment Division, 2024). In this memorandum, the Establishment Division reiterated the instructions contained in the Conduct Rules, 1964. No civil servant can participate in a media program or write for a newspaper without prior permission of the Government. Moreover, in terms of rule 18 of the Rules *ibid*, the Civil Servants are barred from sharing information with an unauthorized person. In terms of rule 22 of the Rules *ibid*., the Civil Servants shall not make any statement which invite embarrassment for the government. In terms of rule 21 read with rule 25 and 25 A of the Rules *ibid*, the Civil Servants shall avoid from expressing views against the ideology of Pakistan, policies of the government or relations with a friendly country. The Establishment Division's OM observed that despite clear instructions, the Civil Servants have been found offering views on host of subjects on social media platforms such as Facebook, Instagram, Twitter etc. The Establishment Division directed the Civil Servants to avoid following trends related to political parties. It also directed the Civil Servants to maintain impartiality by not indulging in any political discussion or forwarding or sharing political views.

The Civil Servants shall not disseminate any information especially pertaining to the government matters which appears fake or misleading. However, the Establishment Division did not discourage the use of social media by the Civil Servants for improving public service delivery or showcasing the government initiatives or inviting public feedback.

PESTLE Analysis

- **Political Analysis:** The legislations and initiatives to curb fake news or disinformation are damaging the political capital of ruling party and its allies. The recently notified the Prevention of Electronic Crimes (Amendment) Act, 2025 is inviting criticism from opposition parties, human rights organizations, associations of prints & electronic journalists as well as digital rights activists. The ruling alliance did not do exhaustive consultations with all stakeholders before introducing such an important piece of legislation in the Parliament. When the draft bill was referred to the Committees of the Senate and the National Assembly, the views expressed by the opposition law makers as well as media representatives were not incorporated. The Prevention of Electronic Crimes Act, 2016 was also legislated during the then Government of PML-N, however, later on, while in opposition, it faced the brunt. The provisions of the recently legislated Act, though are aimed at curbing fake news, disinformation and unlawful content, however, it will muzzle freedom of expression. The primary purpose seems to silence the critics. Freedom of press is fundamental pillar of a thriving democracy as free press not only keeps an eye on the government's action but also stands with democracy against undemocratic forces. Similarly, the strategy to ban access to Twitter or X also brought embarrassment for the government. On one side, the Twitter or X is ban, while, on the other side, important government functionaries have been seen using it, by VPN, to propagate the government policies or actions. When the matter was taken up by the different High Courts, the statement of the concerned government officials before the courts also brought embarrassment as none could explain as why was the social media platform banned. The strategy to slowdown internet has also backfired and brought ridicule for the Ministry of Information and Technology besides extending economic losses to the country. The provision of criminalizing fake news or disinformation is being criticized by even those journalists as well who are, otherwise, considered pro-government.
- **Economic Analysis:** There is no doubt that disinformation or fake news causes chaos and uncertainty which are disastrous for economic development. However, the government's recent strategies such as installation of firewall, banning social media platforms, slowing down internet speed and introducing the Prevention of Electronic Crimes (Amendment) Act, 2025 are also equally harmful for the economy of the country. As per report released by Top10VPN.com, Pakistan led the world in terms of financial losses suffered as a result of outages and shutdowns of internet and social media last year. Pakistan topped the chart with cumulative effect of \$1.62 billion (Malik, 2025). The strategies to curb fake news and disinformation such as slowing down speed of internet or installation of firewall are proving destructive for freelancers too.

- Pakistan-based freelancers contributed foreign exchange earnings to Pakistan's economy through remittances of US\$ 350.15m million during FY2024 (July-March) (Finance, Pakistan Economic Survey 2023-24, 2024). Mr. Olof Skoog, the Human Rights representative of the European Union urged the government not to introduce legislations to curtail freedom of press. He further said that the fate of GSP Plus status depends on how does the government comply with the international obligations (Komal, 2025). These measures have consequences for GSP Plus status too, which is crucial for exports to the EU countries.
- **Social Analysis:** The fake news or disinformation, no doubt, has disturbed social cohesion. But, the measures or initiatives, adopted by the government, to curtail fake news or disinformation are not beneficial for the society either. Banning social media platforms, introducing strict laws and installation of firewall are discrediting the political government in the general public and creating social resentment. A democratic and progressive society flourishes on freedom of information and expression. One reason for penetration of fake news or disinformation is the undue control, exercised by the government, on free flow of information because the general public is under the impression that whatever comes from the government is a propaganda. The journalists, who once enjoyed public approval, when aligned themselves with the government, lost public ratings. Moreover, curtailing free flow of information triggers the curiosity in human beings and, in order, to satisfy their curiosity they search different platforms and believe in the content displayed therein. Though, the government has restricted the access to X, yet, a lot many are using it by VPN. The better strategy for the government is to create awareness and improve digital literacy so that people are able to distinguish between fake news and authentic news. Difference of opinion, in a progressive society, is encouraged and not suppressed. Tactics such as arrest and incarceration develop a sympathy for the social media activist or journalist and his viewership increases. For instance, the viewership of Imran Riaz, Matiullah Jan and Asad Toor increased on YouTube channel increased after their arrest. Thus, arrest or imprisonment is never productive to handle fake news or disinformation. Ban on Social Media Platforms e.g. Twitter or X or slowing down Internet can prove counterproductive as public does not know from where to verify the facts. (Baig, Dawn Newspaper, 2024).
- **Technological Analysis:** The IT industry in Pakistan currently generates an annual export of around US\$ 2.6 billion (Finance, Pakistan Economic Survey 2023-24, 2024). The Prime Minister wants to boost the IT Exports to US \$ 25 Billion (The Nation, 2024). However, the initiatives or strategies used by the Government to curb fake news or disinformation have serious repercussions for the IT sector. The IT industry, ecommerce and freelancing is suffering due to such internet outages. Pakistan's IT sector faces \$ US 1 million loss per hour due to internet slow down (Fida, 2024). Due to this reason Pakistan's IT companies are shifting their business to Dubai. The Dubai Chamber of Commerce witnessed 3,968 Pakistani companies registered in the last six-month period, which is a 17% increase when compared with the figure of 3,395 in the same period (January-June) of 2023 (Ali F. , 2024). Therefore, the government needs to revisit its policies related to slowing down internet or installation of firewall for economic progress of the country.

- **Legal Analysis:** The Federal Government, after approval of the both houses of the Parliament and assent of the President, has notified the Prevention of Electronic Crimes (Amendment) Act. 2025. This legislation is aimed to curb fake news or disinformation. New forums such as Social Media Protection and Regulatory Authority, Social Media Complaint Council, Social Media Tribunal and National Cyber Crime Investigation Agency have been created. The fake news or disinformation has been criminalized with a fine of Rs. Two (2) million or sentence of three (3) years or with both. The Social Media Platforms have been directed to enlist with the Authority. However, almost similar clauses were mentioned in the previous Acts too. The fundamental problem is of implementation. How will the Social Media Protection and Regulatory Authority push giants like YouTube, X, Instagram, Facebook etc. to get enlisted or open their offices in Pakistan? Moreover, the members of civil society, digital rights activists, political activists and media persons will challenge this new legislation in the court of law by calling it conflicting with Article 19 of the Constitution of the Islamic Republic of Pakistan. One petition has already been filed in the Lahore High Court challenging the Act.
- **Environmental Analysis:** The Nongovernmental Organizations have criticized the Prevention of Electronic Crimes (Amendment) Act, 2025 calling it an attempt to prosecute journalists and eradicate freedom of expression. are against the legislation or initiatives curbing fake news and disinformation. The Human Rights Commission of Pakistan (The News International, 2025), Reporters without borders and Amnesty International have unanimously criticized this new legislation. The Digital Rights activists are also criticizing the new legislation. Pakistan, already, does not enjoy good ranking as far as protection of human rights and freedom of speech are concerned. These strategies and laws will further downgrade its rankings and may have severe consequences for the economy too.

Case Studies

Asma Shirazi Versus Council of Complaints through Secretary, and others

The facts are that on 19.01.2022, the Supreme Court's three-member bench was hearing a suo motto case titled "**Suo Motu action regarding highhandedness of journalists by FIA action pursuant to FIR No.127/2021 and FIR No.128/2021 lodged at Cyber Crime Wing Lahore**". During the hearing of the case, the then Attorney General submitted that some social media platforms were being used to malign private citizens. The Attorney General also referred to a Vlog wherein the nomination of the new Prime Minister of Azad Jammu & Kashmir was associated with the then first lady's belief in supernatural forces. Upon this, one of the members of the bench remarked that such Vlogs were utterly disgraceful and had that been on-aired in the UK, the Vlogger would have been subjected to hefty fine. After the proceedings of the Court, the ARY Digital reported the judges' remarks by placing picture of Ms. Asma Shirazi alongside news bulletin, thus, making the viewers believe that the courts remarks were against her.

Ms. Asma Shirazi filed a complaint against ARY News in the PEMRA Council of Complaints, however, that was turned down as being not maintainable. She, thereafter, assailed the orders of the Council of Complaint dated 21.12.2022 in the Islamabad High Court. Her case, in the Islamabad High Court was heard by Justice Mohsin Akhtar Kiyani. The Islamabad High Court, after giving hearing to Ms. Asma Shirazi and the counsel of ARY News, awarded damages of Rs.50,000 as well as directed ARY News to broadcast an apology for their action and for clarity of general public. The Court also observed that Ms. Asma Shirazi can also approach the competent court under the defamation law as well.

Additional Deputy Commissioner (General) Islamabad Versus Tayyab Gondal

During the course of study, an interview was conducted of Mr. Muhammad Atif Kokhar, Advocate Supreme Court of Pakistan. He contested a defamation suit, in 2022, on behalf Rana Waqas, the then Additional Deputy Commissioner, Islamabad Capital Territory against a YouTuber namely Tayyab Gondal. The facts of the case were that Mr. Tayyab Gondal through his YouTube channel on-aired a video whereby he alleged that the Additional Deputy Commissioner (General), in his capacity as Additional District Magistrate, was not taking action against the massage centers in sector E-11, Islamabad due to bribe and fleecing. He, thereafter, uploaded this video from his Facebook page as well. On knowing about the videos, the then Additional Deputy Commissioner engaged Mr. Muhammad Atif Kokhar for filing a defamation suit, in the Islamabad District Courts, against Mr. Tayyab Gondal for malicious and fake news to hurt his reputation. The matter was heard in the District Courts, under the Defamation Ordinance, 2002, evidence was recorded and the Court reached to the conclusion that Mr. Tayyab Gondal concocted fake and fabricated story to defame the then Additional Deputy Commissioner, ICT, Islamabad. Consequently, Additional District and Sessions Judge Mr. Mehmood Ahmad Jasra ordered Mr. Tayyab Gondal to pay one (1) million as damages to the petitioner. I inquired from Mr. Muhammad Atif Kokhar, Advocate Supreme Court of Pakistan as if damages were ever paid by the defendant? He informed that an appeal was filed by the defendant in the Islamabad High Court which was still pending.

Core Research Outcomes & Policy Challenges

- The stakeholders have not been consulted while drafting legal regime and conceiving strategies to counter fake news or disinformation. The Prevention of Electronic Crime (Amendment) Act, 2025 was rushed through the Parliament and its Committees. Neither any debate took place nor views were invited from the opposition or working journalists. With opposition and media workers agitating on the recent legislation, its implementation will become difficult.
- The definition of “aspersion” has been deliberately kept vague so as to apply it against the critics or political workers or individuals having opposing point of view. With such a vague definition, a judicial implementation of policy is a challenge.

- Though, the law provides for establishment of new forums, to deal with fake news or disinformation, such as Social Media Protection and Regulatory Authority, Social Media Complaint Council, Social Media Protection Tribunal and National Cyber Crimes Investigation Agency, yet, the Government has the exclusive powers to appoint their chairpersons and members. This creates an impression that the new forums will serve the agenda of the government. And as the Government has the power to remove the chairpersons and members of the new forums, the impartiality or autonomy of the new forums becomes doubtful.
- There are two diverse approaches to deal with fake news or disinformation; one is to consider it as civil wrong and devise strategy accordingly, while, the other is to declare it criminal act and prepare strategy accordingly. In the Punjab Government's Defamation Act, 2024, the fake news or disinformation has been treated as civil wrong, while, in the Prevention of Electronic Crimes (Amendment) Act, 2025, it has been treated as a criminal offence having punishment of imprisonment up to three (03) years or fine up to two (02) million or with both. In the developed countries like United Kingdom, fake news is treated as civil wrong which invites damages.
- As the policies are hurriedly conceived without proper analysis, therefore, the targets set therein are, often, unrealistic. Same has happened with the Prevention of Electronic Crimes (Amendment) Act, 2025. The targets such as enlisting of social media platforms, pushing them to open offices in Pakistan and issuing directions to remove the unlawful content are unrealistic, therefore, difficult to achieve.
- The Punjab Defamation Act, 2024 has a positive aspect of appointing the Chairperson of the Tribunal with the consultation of the Chief Justice of the Lahore High Court. However, the Prevention of Electronic Crimes (Amendment) Act does not take into account consultation with the Chief Justice of Pakistan for appointing the Chairperson. Similarly, the Punjab Defamation Act, 2024 provides for removal of the Chairperson of the Tribunal with the consultation of the Chief Justice, however, in the case of the Prevention of the Electronic Crimes (Amendment) Act, 2025, no such thing is mentioned.
- The law does not mention as whether the Social Media Protection Tribunal will have the powers of the Civil Court or Criminal Court while conducting proceedings. It also removes oversight of the High Courts by making the Supreme Court as the Appellate Authority. Similarly, the Punjab Defamation Act mentions that Evidence Act or Qanoon-e-Shahdat will not be applicable during proceedings before the Tribunals. These anomalies need to be addressed.
- Pakistan has a Defamation law, however, its implementation is weak. It seems beyond comprehension that instead of improving implementation of Defamation or libel or slander Law and accelerating the working of the Courts, the preference of the government is to establish more authorities and forums.
- The Government strategies are not focused on initiatives of improving digital literacy, creating awareness, negotiating MoUs with International Fact Checking Networks or using Artificial Intelligence to counter fake news or disinformation.

Proposed Change in the Policy to Curb Fake News and its intended Outcomes

The new policy to curb fake news or disinformation shall have following contours or components:

- i. The new policy shall treat fake news or disinformation as a Civil Wrong and not a Criminal offence. The act of dissemination of fake news or disinformation shall invite damages on the proponent. Arresting YouTubers or Vloggers increase their viewership and bring bad name for the government.
- ii. There shall be a clear definition of fake news or disinformation e.g. an intentional act of conceiving or spreading malicious and baseless information with an intention to damage someone's reputation.
- iii. In case of creation of Social Media Regulatory Authority or Complaint Council, the powers to appoint its Chairperson and members shall not be with the Government, rather it shall be with the Parliamentary Committee.
- iv. The Chief Justice of Pakistan be requested to appoint a serving judge of the High Court to act as chairperson of the Social Media Tribunal. This will secure public trust as High Court's serving judge is by no means subordinate to the political executive.
- v. The new policy shall include strengthening of Defamation, Slander and Libel laws. The defamation suits be decided within three (03) months. If laws of Defamation and Libel are implemented and enforced in true letter and spirit, there will be no need of separate tribunals etc.
- vi. The Policy shall make it mandatory on the TV Channels to start fact checking initiatives. Some news channels do run fact check twitter handles where they report about the authenticity or falsity of any news, however, every channel shall do that.
- vii. The Policy shall include MoUs with International Fact Checking Networks to impart training to Pakistani Journalists, particularly reporters, and officials of Ministry of Information and Broadcasting.
- viii. The Policy shall also include awareness campaigns in the Universities and Colleges to educate the youth as how to differentiate between fake news or disinformation and authentic news.
- ix. The Policy shall aim at regulating Vloggers on YouTube as a lot of complaints come against them for spreading fake news or disinformation. The thumbnails used in their Vlogs are so sensational that people are attracted to watch their channels. Most often, it happens that the content of the Vlog is altogether different from the thumbnail used.
- x. The policy shall maintain a fine balance between regulating fake news or disinformation and not restricting or limiting freedom of expression or free press.
- xi. The Policy shall be focusing upon use of Data Analytics Techniques and Artificial Intelligence to debunk fake news or disinformation.
- xii. So far, Pakistan has been reluctant in joining Budapest treaty which is the only treaty on cybercrime and seventy-five countries are party to it. It is high time that there shall be a debate in the parliament as what are the benefits for Pakistan to join this treaty.

- xiii. Lastly, the Policy shall aim at developing a national law to counter fake news or disinformation with the consultation of all stakeholders including Journalists, Opposition law makers, members of civil societies, human rights organizations and digital rights activists.

Conclusion

The study unfolds that undoubtedly dissemination of fake news or disinformation poses serious risk to social cohesion, integration and is a cause for tarnishing the image of national institutions. However, the legal regime and initiatives, be it undertaken by the provincial government of Punjab or the federal government, suffer from serious defects. The legislations are passed without developing a consensus and incorporating views of the stakeholders. Political expediency is preferred over developing policies having lasting impacts. The recent legislations, from their design, seem to be crafted to target political opponents and silence critical voices. The government's dominant and exclusive say in appointment and removal of the heads of the forums, responsible to curb fake news or disinformation, raises eyebrows on their autonomy and neutrality. Instead of opting for soft strategies such as fact-checking initiatives, digital literacy campaigns and using modern tools to counter fake news or disinformation, coercive measures have been adopted. Similarly, the strategies such as slowing down internet, blocking access to social media platforms and installation of firewall have impacts on the overall economy of the country.

Recommendations

1. The Federal Government shall constitute a Parliamentary Committee consisting of members from both houses of the Parliament, having equal representation of opposition and treasury benches to reconsider the Prevention of Electronic Crimes (Amendment) Act, 2025 after inviting suggestions from Media bodies or Journalist associations and members of the civil society. A consensus-based amendment shall be proposed in the existing law for discussion and approval of the Parliament. The Parliamentary Committee shall be constituted by the Speaker of the National Assembly of Pakistan. Media bodies and Associations of Journalists be engaged by Ministry of Information and Broadcasting. The Ministry of Law & Justice shall be responsible for drafting amended law and placing the same before the Parliament for consideration.
2. The powers to appoint the Chairpersons and members of the Social Media Protection & Regulatory Authority, the Social Media Complaint Council and National Cyber Crimes Investigation Agency be given to the Parliamentary Committee, having equal representation of opposition and treasury benches, consisting of four members, two each from the National Assembly and the Senate.
3. The Chairpersons and members of the forums shall have security of the tenure. Their tenure shall be non-extendable.
4. The Chairperson and members of the Social Media Protection Tribunal shall be appointed and removed in consultation with the Chief Justice of

- Pakistan. The first appellate forum against the decisions of the Social Media Protection Tribunal shall be the concerned High Courts.
5. The Punjab Defamation Act, 2020 shall be amended to incorporate application of Qanoon-e-Shahadat to the proceedings of the Tribunal.
 6. The exclusive power of Chairperson of the Social Media Protection and Regulatory Authority to order removal of online content, within 24 hours of the receipt of the application, be abolished. The decision to remove the online content shall be taken by the Authority, with consensus, after conducting a formal inquiry.
 7. The dissemination of Fake News or Disinformation shall be treated as a civil wrong attracting damages. Imprisonments or arrests of journalists or YouTubers or Vloggers create bad images for the government.
 8. The government shall negotiate with the Social Media Platforms that they introduce fact-checking initiatives for their users in Pakistan. Whatsapp and Facebook have launched such initiatives in India.
 9. The IFCN (International Fact Checking Network) offers training to the Journalists and officials dealing with fake news or disinformation. The Government shall approach IFCN to offer trainings to Pakistan based journalists as well. Moreover, the private fact checking initiatives such as Soch fact check, AFP Fact check etc. be encouraged by the Government.
 10. The Ministry of Information and Broadcasting shall apply data analysis techniques such NLP, Machine learning models, network analysis, fact checking with AI and Semantic Analysis tools to filter fake news or disinformation.
 11. In the definition clause of the Prevention of Electronic Crimes (Amendment) Act, 2025, the definition of expression "Aspersions" is too broad. It shall be rephrased as the intentional crafting and spread of fake or baseless information to hurt someone's reputation.

Log Frame Matrix

Action	By	How
1. Proposing amendments in the Prevention of Electronic Crimes (Amendment) Act, 2025 in consultation with the opposition parties, Associations and Bodies of Journalists and Civil Society Members	<ul style="list-style-type: none"> • Parliament i.e. the National Assembly & Senate of Pakistan • Ministry of Law & Justice • Ministry of Information & Broadcasting • President for assent as he has powers, for one time, to refer back the bill to the Parliament for reconsideration 	<p>The Speaker National Assembly shall constitute a Committee having members from treasury and opposition benches, from both houses, as well representatives of Journalists' Associations and Civil Society.</p> <p>This Committee shall deliberate and propose consensus-based amendments in the Prevention of Electronic Crimes (Amendment) Act, 2025.</p> <p>Once consensus is reached, the Ministry</p>

		<p>of Law & Justice shall prepare the draft amendments and place before the Parliament for consideration.</p> <p>To engage with the Journalists and Media persons will be the responsibility of the Ministry of Information and Broadcasting.</p>
<p>2. The fake news or disinformation shall be treated as a Civil wrong for which penalty is damages. The clause regarding criminalizing of the fake news or disinformation shall be deleted.</p>	<ul style="list-style-type: none"> • The Prime Minister’s Office. • Ministry of Law and Justice to propose amendments in the form a new bill. • Parliament i.e. National Assembly & Senate for approval of draft amendments. • President for giving assent to the Bill. 	<ul style="list-style-type: none"> • The Prime Minister shall invite journalists and media persons on a luncheon and inform them that the Government has decided to amend the clause wherein up to three (03) years or two (02) million fine was prescribed for “aspersions” or “unlawful content”. An amendment is being introduced to treat disinformation as a Civil wrong. • The Ministry of Law and Justice shall, thereafter, prepare a draft bill and place it before the both Houses of the Parliament for approval. • This will increase government’s goodwill as well improve its image.
<p>3. Appointment & Removal of chairpersons and members of Social Media Protection & Regulatory Authority, Social Media Complaint Council and National Cyber</p>	<ul style="list-style-type: none"> • Parliament i.e. the National Assembly and Senate • Ministry of Law & Justice • Ministry of Interior 	<ul style="list-style-type: none"> • The Ministry of Law and Justice in consultation with Ministry of Interior shall propose amendments in the Prevention of Electronic Crimes (Amendment) Act, 2025.

<p>Crimes Investigation Agency be given to the Parliamentary Committee, having equal representation of opposition and treasury benches, of both houses of the Parliament to be constituted by the Speaker National Assembly</p>		<ul style="list-style-type: none"> • The Bill shall be placed before both houses for approval. • After approval, the Speaker shall constitute the Committee. • The panel for appointment of Chairpersons and members of the forums shall be placed by Ministry of Interior for consideration of the Committee.
<p>4. The chairperson of the Social Media Protection Tribunal be appointed and removed in consultation with the Chief Justice of Pakistan.</p>	<ul style="list-style-type: none"> • Parliament i.e. the National Assembly and Senate • The Supreme Court of Pakistan • Ministry of Law & Justice • Ministry of Interior 	<ul style="list-style-type: none"> • The draft amendments in the Prevention of Electronic Crimes (Amendment) Act, 2025 be proposed to change the procedure for the appointment of Chairperson and members of the Tribunal. • Thereafter, the draft Bill be placed for consideration of the Parliament. • After approval of the draft amendments, Ministry of Law & Justice shall share names for appointment of chairperson and members of the tribunal with the Chief Justice of Pakistan, through the Registrar Supreme Court of Pakistan, for consultation. On receiving consent of the Chief Justice of Pakistan, the appointment be notified.
<p>5. High Courts shall be first appellate forums against the</p>	<ul style="list-style-type: none"> • Parliament i.e. the National Assembly and Senate 	<ul style="list-style-type: none"> • Ministry of Law & Justice shall propose

<p>decisions of Social Media Protection Tribunal</p>	<ul style="list-style-type: none"> • President • Ministry of Law & Justice 	<p>amendments in the Prevention of Electronic Crimes (Amendment) Act, 2025, to add the concerned High Courts as first Appellate Authority against the Orders of the Tribunal.</p> <ul style="list-style-type: none"> • The Bill shall be placed before both houses of the Parliament for consideration
<p>6. Giving powers of the Civil Court to the Tribunal</p>	<ul style="list-style-type: none"> • Parliament i.e. the National Assembly and Senate • President • Ministry of Law & Justice 	<ul style="list-style-type: none"> • This will also require an amendment in the Prevention of Electronic Crimes (Amendment) Act, 2025. • Ministry of Law & Justice shall introduce a bill for amendment in the existing Law and after approval of both houses, same shall be notified.
<p>7. Implementing Qanoon-e-Shahdat, 1984 on the proceedings of the Tribunal constituted under the Punjab Defamation Act, 2024. The clause regarding preliminary damages and leave to defend be deleted.</p>	<ul style="list-style-type: none"> • Law & Parliamentary Affairs Department, Government of Punjab • Provincial Assembly • Governor 	<ul style="list-style-type: none"> • The Law & Parliamentary Affairs Department, Government of Punjab shall introduce amendments in the Punjab Defamation Act, 2024. • After approval of the Provincial Assembly and assent of the Governor, same shall be notified.
<p>8. Use of Data Analytics to Identify Fake News Use of Natural Language Processor: NLP is the usage of algorithms to comprehend human language. For</p>	<ul style="list-style-type: none"> • Ministry of Information & Broadcasting • Ministry of Information Technology and Telecommunication • NITB & PITB 	<ul style="list-style-type: none"> • Ministry of Information and Broadcasting shall in collaboration with Ministry of IT & Telecommunication shall use and develop data analytical

<p>identifying fake news, NLP analyses the text to detect patterns, such as sensational language, inconsistencies, or claims that don't match known facts. A common NLP application is sentiment analysis, which assesses the emotional tone of a news article. Tools like Vader or Text Blob can be used to automatically analyse the sentiment of articles and flag overly sensational content as having potential of being fake.</p> <p>Machine Learning Model: Machine learning models can be trained on large datasets containing examples of both real and fake news to learn the distinguishing features. Using Random Forest or Support Vector Machines (SVM).</p> <p>Network Analysis: It involves understanding how information disseminates across different networks and determining the patterns typical of fake news. Thereafter, using tools like Gephi or NetworkX to visualize, analyse and map these networks</p> <p>Use of Artificial Intelligence: using AI to compare the claims made in a news item against verified data sources. AI will quickly cross-reference and evaluate the authenticity of the content.</p>		<p>techniques and Artificial Intelligence to counter fake news.</p> <ul style="list-style-type: none"> • The High-Tech companies be engaged in this regard to help the Government.
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<p>Semantic Analysis Tools e.g. IBM Watson: This Analysis is used to determine subtle cues that indicate disinformation, such as contradictory claims or facts within the same article. Say a news story claims that certain even has taken place ten years ago, semantic analyse can confirm or refute this based on the historical data.</p>		
<p>9. Digital literacy & Public awareness Campaigns and Fact Checking initiatives are effective to curb fake news or disinformation. Only two of Pakistan's local facts check platforms are part of International Factchecking network. There is a need to increase the number of facts checking platforms. The news channels shall also start their fact check initiatives so as to flag fake news or disinformation.</p>	<ul style="list-style-type: none"> • Ministry of Information & Broadcasting • Ministry of Information Technology & Telecommunication • PEMRA 	<ul style="list-style-type: none"> • Seminars and Workshops to increase digital literacy. Engaging students of universities. • PEMRA to convince all news channels to start fact-checking initiatives. • Ministry of Information & Broadcasting to coordinate with IFCN for training Pakistan's Journalists in Factchecking.
<p>10. Strengthening laws of Libel, Defamation and Slander so that the cases are disposed of quickly</p>	<ul style="list-style-type: none"> • Parliament i.e. the Senate & National Assembly • Ministry of Law & Justice • Supreme Court of Pakistan 	<ul style="list-style-type: none"> • Amendments be introduced in the Defamation Ordinance to make the disposal of defamation case time bound i.e. within three (03) months. • Moreover, the Chief Justice of Pakistan be requested to make disposal of Defamation suits part of the

		National Judicial Policy. In National Judicial Policy, the vision is provided to the subordinate Judiciary.
11. Engaging with Social Media Platforms to open their offices in Pakistan and depute their representatives	<ul style="list-style-type: none"> • Ministry of Foreign Affairs • Ministry of Information Technology and Telecommunication 	<ul style="list-style-type: none"> • The Social Media Platforms be engaged to open their offices in Pakistan. Though the Prevention of Electronic Crimes (Amendment) Act, 2025 has a provision but this a gigantic task for which parleys or negotiations need to be made with CEOs of the Social Media Platforms. It will be a tedious process to convince them given the security and legal paradigm of Pakistan but effort can be made.

References

1. Abbasi, K. (2024, September 26). *Unlike UK, Pakistan struggles to curb fake news*. The News International. <https://www.thenews.com.pk/print/1233944-unlike-uk-pakistan-struggles-to-curb-fake-news>
2. Ahmad, O. (2025, January 18). *The economic impact of Pakistan's internet crisis*. The Diplomat. <https://thediplomat.com/2025/01/the-economic-impact-of-pakistans-internet-crisis/>
3. Ahsan, I. S. (2025, January 23). *NA passes controversial PECA amendment bill amid walkout by PTI, journalists*. Dawn. <https://www.dawn.com/news/1887195/na-passes-controversial-peca-amendment-bill-amid-walkout-by-pti-journalists>
4. Ali, F. (2024, August 17). *Pakistan's economic situation worsens with political instability*. Business Recorder. <https://www.brecorder.com/news/40317906>
5. Ali, K. (2024, May 22). *Government's new initiatives in Pakistan's digital policy*. Dawn Newspaper. <https://www.dawn.com/news/1834942>
6. Ali, K. (2025, January 15). *Controversial new bills in Pakistan affecting digital media*. Dawn Newspaper. <https://www.dawn.com/news/1885210>
7. Ali, K. (2025, January 15). *PECA amendment discussions: A national debate*. Dawn Newspaper. https://epaper.dawn.com/DetailImage.php?StoryImage=15_01_2025_012_004
8. Amnesty International. (2025, January 24). *Pakistan authorities pass bill with sweeping controls on social media*. Amnesty International. <http://www.amnesty.org/en/latest/news/2025/01/pakistan-authorities-pass-bill-with-sweeping-controls-on-social-media/>
9. Baig, A. (2024, April 27). *PM's role in curbing misinformation in Pakistan*. Dawn Newspaper. <https://www.dawn.com/news/1829946>
10. Baptista, J. (2022). Working definition of fake news. *Encyclopedia 2022*, 632-645.
11. BBC. (n.d.). *Understanding fake news and misinformation*. BBC. <https://www.bbc.co.uk/bitesize/articles/z3hhvj6>
12. BBC. (2024, September 3). *The spread of misinformation in Pakistan*. BBC. <https://www.bbc.com/news/articles/crkmpe53l6jo>
13. Bennett-Jones, O. (2016, December 22). *Challenges faced by Pakistan's press freedom*. The Dawn Newspaper. <https://www.dawn.com/news/1303811>
14. Borders, R. W. (2024, May). *RSF report on press freedom in Pakistan*. RSF - Reporters Without Borders. <https://rsf.org/en/index?year=2024>
15. Bradshaw, B. G. (2023). *Chilling legislation: Tracking the impact of fake news laws on press freedom internationally*. Center for International Media Assistance.
16. Broadcasting, M. O. (2025, January 20). *Code of conduct for media*. Ministry of Information & Broadcasting. <https://www.moib.gov.pk/MediaLaws/coc2015.pdf>
17. Chaudry, A. B. (2025, January 27). *Senate committee approves PECA bill amid opposition protests*. The News International. <https://www.thenews.com.pk/latest/1276695-senate-committee-okays-peca-bill-ignoring-opposition-by-jui-f-journalists>

18. Countering Disinformation. (2021, April 2). *Public awareness campaigns against disinformation.* Countering Disinformation. <https://counteringdisinformation.org/topics/csos/6-public-awarenessmedia-literacy-campaigns>
19. Daily Ausaf. (2024, August 24). *New appointments at PTV and government-backed media bias.* Daily Ausaf. <https://dailyausaf.com/en/pakistan/information-ministry-appoints-pml-n-favorite-anchors-in-ptv/>
20. Dawn News. (2024, October 24). *Media restrictions and their impact on Pakistan's freedom of speech.* Dawn News. <https://www.dawn.com/news/1867258?ref=whatsapp>
21. Dawn Newspaper. (2018, October 1). *Press freedom in Pakistan: A long struggle.* Dawn Newspaper. <https://www.dawn.com/news/1436167>
22. Dawn Newspaper. (2024, September 4). *Latest developments in Pakistan's digital media landscape.* Dawn Newspaper. <https://www.dawn.com/news/1856908>
23. Dawn Newspaper. (2025, January 24). *Pakistan's evolving stance on digital misinformation laws.* Dawn Newspaper. <https://www.dawn.com/news/1887269>
24. Desk, N. (2024, November 2). *PTA blocks accounts on TikTok for spreading obscene content.* The Express Tribune. <http://tribune.com.pk/story/2506966/pta-blocks-113133-accounts-on-tiktok-for-obscene-content?amp=1>
25. Desk, N. (2024, December 11). *Blocking of SIM cards in Pakistan over fake news spreading.* The Express Tribune. <https://tribune.com.pk/story/2515292/80000-sim-cards-blocked-in-pakistan-for-spreading-fake-news>
26. Director General Operations, P. (2022, May 16). *Warning against content harmful to state institutions.* PEMRA. [https://www.pemra.gov.pk/assets/uploads/news/warning_content_a gainst State Institutions.pdf](https://www.pemra.gov.pk/assets/uploads/news/warning_content_against_State_Institutions.pdf)
27. Division, C. (2025, January 20). *The Rules of Business, 1973.* Cabinet Division, Government of Pakistan. [https://cabinet.gov.pk/SiteImage/Misc/files/ROB%2C%201973/ROB\(as-amended-upto-5th-December%2C%202024\).pdf](https://cabinet.gov.pk/SiteImage/Misc/files/ROB%2C%201973/ROB(as-amended-upto-5th-December%2C%202024).pdf)
28. Establishment Division. (2024, September 2). *Guidelines for social media use by government employees.* Establishment Division. <https://establishment.gov.pk/SiteImage/Misc/files/Instructions%20on%20use%20of%20social%20media%20platform.pdf>
29. Fida, A. (2024, December 4). *Pakistan's IT sector faces \$1 million per hour loss due to internet shutdowns.* Economy. <https://www.economy.pk/pakistans-it-sector-faces-1-million-per-hour-loss-due-to-internet-shutdowns/#:~:text=Pakistan%E2%80%99s%20IT%20Sector%20Faces%20%241%20Million%20Per%20Hour,hind>
30. Finance, M. O. (2024). *Pakistan Economic Survey 2023-24.* Islamabad: Ministry of Finance.
31. Guramani, N. (2023, December 6). *Government's response to online misinformation and regulation of digital platforms.* Dawn News. <http://www.dawn.com/news/1795588>
32. Gurmani, N. (2024, December 3). *Digital media restrictions on Pakistan's press freedom.* Dawn. <http://www.dawn.com/news/1876386>

33. Hussain, J. (2022, April 23). *Pakistan's media: Growing pressure on journalistic freedom*. Dawn News. <https://www.dawn.com/news/1686433?ref=whatsapp>
34. Jamal, U. (2024, May 28). *Pakistan plans to regulate social media through legislation*. The Diplomat. <http://thediplomat.com/2024/05/pakistan-plans-to-regulate-social-media-through-legislation/>
35. Journalists, T. C. (2022). *Journalists imprisoned for fake news accusations*. The Committee to Protect Journalists. https://cpj.org/data/imprisoned/2022/?status=Imprisoned&charges%5B%5D=False%20news&start_year=2011&end_year=2022&group_by=location
36. Journalists, T. C. (2018). *Global report on journalists jailed for fake news*. The Committee to Protect Journalists. <https://cpj.org/reports/2018/12/journalists-jailed-imprisoned-turkey-china-egypt-saudi-arabia/>
37. Journalists, T. C. (2025, January). *Leading jailers of journalists in 2024*. The Committee to Protect Journalists. <https://cpj.org/thematic-reports/in-record-year-china-israel-and-myanmar-are-worlds-leading-jailers-of-journalists/>
38. Justice, M. O. (1973). *The Constitution of Islamic Republic of Pakistan*. Islamabad: Printing Corporation of Pakistan.
39. Justice, M. O. (2025, January 20). *The Pakistan Code*. The Pakistan Code. <https://pakistancode.gov.pk/pdffiles/administrator0d8373dfae195c4de13b0bd012416abb.pdf>
40. Khan, S. (2019, April 27). *Challenges in Pakistan's fight against fake news*. Dawn Newspaper. <https://www.dawn.com/news/1478569>
41. Komal, A. (2025, January 30). *Press freedoms in Pakistan amidst growing misinformation*. Dawn Newspaper. https://epaper.dawn.com/DetailNews.php?StoryText=30_01_2025_001_006
42. Malik, A. M. (2025, January 4). *The evolving role of digital media regulation in Pakistan*. Dawn Newspaper. <http://www.dawn.com/news/1882972>
43. Mansab, M. (2024, April 4). *Combating disinformation in Pakistan*. The Nation. <https://www.nation.com.pk/04-Apr-2024/combating-disinformation-in-pakistan>
44. McLeod, M. Z. (2020). *Fake news: Understanding media and misinformation in the digital age*. The MIT Press.
45. Obaid, M. (2023, September 7). *PTA's efforts to create a safer digital environment for Pakistani youth*. Pakistan Telecommunication Authority. <https://www.pta.gov.pk/index.php/category/pta-and-tiktok-sign-mou-to-foster-a-safer-digital-environment-for-pakistani-youth-1100354978-2024-07-04>
46. Pakistan, G. (2024, August). *Gallup Pakistan's latest data on fake news impact*. Gallup Pakistan. <http://gallup.com.pk/post/37113>
47. Punjab, G. O. (2024, May). *Punjab Laws on online defamation*. Punjab Laws. <http://punjablaws.gov.pk/laws/2884.html>
48. Rehmat, W. N. (2022). *Countering disinformation in Pakistan: Lessons and recommendations for digital journalism*. Freedom Network & DigiMap.
49. Safdar, D. Z. (2024, July 28). *The rise of misinformation in Pakistan*. Pakistan Today. <https://www.pakistantoday.com.pk/2024/07/28/the-surge-of-misinformation-in-pakistan/>

50. Shaheen, S. (2022, May 12). *Fake news, escalation, and polarization in Pakistan*. South Asian Voices. <https://southasianvoices.org/fake-news-escalation-and-polarization-pakistans-disinformation-vulnerabilities/>
51. Tahir Hussain, S. N. (2023, August 17). *PEMRA Amendment Act 2023*. Pakistan Electronic Media Regulatory Authority. https://www.pemra.gov.pk/assets/uploads/legal/PEMRA_Amendme nt_Act_2023.pdf
52. Tariq, W. (2024, May 23). *Punjab's new defamation law sparks protests*. The Diplomat. <https://thediplomat.com/2024/05/punjabs-new-defamation-law-sparks-pushback-protests/>
53. Techjuice. (2018, July). *WhatsApp's ad campaign helps detect fake messages in Pakistan*. Techjuice. <https://www.techjuice.pk/whatsapps-latest-ad-in-a-pakistani-newspaper-helps-you-spot-fake-messages/>
54. Telecommunication, M. O. (2020). *CP (Against Online Harm) Rules, 2020*. Ministry of Information Technology. [https://www.moitt.gov.pk/SiteImage/Misc/files/CP%20\(Against%20 Online%20Harm\)%20Rules%2C%202020.pdf](https://www.moitt.gov.pk/SiteImage/Misc/files/CP%20(Against%20 Online%20Harm)%20Rules%2C%202020.pdf)
55. The Express Tribune. (2020, December 10). *EU DisinfoLab exposes India's role in misinformation*. The Express Tribune. <https://tribune.com.pk/story/2275464/eu-disinfo-lab-expose-against-india-vindicates-pakistan-fo>
56. The Express Tribune. (2024, September 5). *Minister vows to curb digital misinformation*. The Express Tribune. <https://tribune.com.pk/story/2493593/minister-vows-to-curb-digital-misinformation>
57. The Friday Times. (2022, August 10). *Damages and apologies: How UK courts cracked ARY's fake news case*. The Friday Times. <https://thefridaytimes.com/10-Aug-2022/damages-amp-amp-apologies-how-uk-courts-cracked-ary>
58. The Nation. (2024, November 22). *PM Shehbaz Sharif aims for \$25 billion boost in IT exports*. The Nation. <https://www.nation.com.pk/22-Nov-2024/pm-shehbaz-sharif-aims-for-dollar-25-billion-boost-in-pakistan-s-it-exports>
59. The News International. (2018, July 11). *Facebook's role in protecting Pakistan's 2018 election from abuse*. The News International. <https://www.thenews.com.pk/latest/340413-how-facebook-is-protecting-pakistans-election-2018-from-abuse>
60. The News International. (2025, January 25). *HRCP calls for open debate on PECA amendments*. The News International. <https://www.thenews.com.pk/latest/1275972-hrcp-calls-for-open-debate-on-peca-amendments>
61. Wells, B. D. (2024, October 9). *Pakistan's struggle with digital misinformation*. BBC. <https://www.bbc.com/news/articles/c5y06vzk3yjo>