

A Report By Bytes For All, Pakistan



Pakistan's Internet Landscape 2020

April 2021

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PREFACE (BY B4A)

You are holding the 2020 edition of “Internet Landscape of Pakistan”, a seminal initiative of Bytes for All, that meticulously maps Pakistan’s internet landscape alongside covering digital trends and their impact on socio-economic developments as well as challenges and threats in the digital age during 2019-20. This edition also looks at the impact of the ongoing Covid-19 pandemic on people’s digital lives in Pakistan.

The report comes at a time when Covid-19 pandemic is playing havoc all around the world and equally affecting the development indicators negatively in Pakistan. Despite the fact that the pandemic brought opportunities for more digital penetration, connectivity and accessibility of the Internet in the country witnessed downward trends due to challenges with accessibility, affordability and quality of the Internet in far flung areas of the country.

On the one hand, the pandemic related lockdowns augmented public voices online, on the other hand, we also witnessed an exponential increase in the number of blasphemy cases, curbs on digital media, far greater control over free expression, increased censorship, secrecy of public policy decision-making, and violation of fundamental freedoms of citizens. Despite the fact, the current government had put a lot of emphasis on technology for governance and transparency, the safety and security of citizens’ data is not yet on the priority of the government. To this effect, legislative proposals are pending for years, which has been a cause of grave concern for IT development companies, startups and global development partners.

Civil society has progressed tremendously in using the internet to highlight issues, to advocate legislative and political reforms, to sensitize people on complex issues concerning social justice and to gather mass support for human rights causes. However, just as civil society has adopted creative ways of expression through the internet, the state has also become more inventive in controlling opinion. Which is why Bytes For All made exhaustive efforts to put together this report as a demonstration of our commitment to bridge the digital divide and play its role in protecting citizens’ right to free expression especially through the use of digital media.

We are grateful to Mr. Jahanzaib Haque for his continued commitment to this publication. Mr. Haque is one of Pakistan’s top professionals in digital media, and the lead researcher for this report. He and his team also managed to bring subject specialists onboard with their views and way forward for positive developments in Internet landscape in the country.

I also take this opportunity to acknowledge the hard work and commitment by Mr. Shahzad Ahmad, Country Director Bytes for All, for initiating this series, providing leadership to the project and mobilizing resources for this important initiative. I offer my gratitude to the entire team of professionals at Bytes for All, who supported the process and worked out logistics involved in the study. Finally, Bytes for All is indebted to all the international and national partners whose timely and generous support was instrumental in the publishing of this report.

We hope this report will be useful for government institutions, media professionals, policy makers, civil society, academia, UN special mandate holders and international development partners. With this, I offer our work to all of you for your reading pleasure. We urge you to share your feedback and hope this proves useful for your endeavors.

Marvi Sirmed

BOARD CHAIR

PREFACE (BY FES)

Media and the other means of (mass) communications are generally recognized as highly important. This applies to the Internet as well: While early on it was developed for military use and comparatively few academics, today it is available for most people, and it is important for business development, research, entertainment, the shaping of opinion in a society, shopping, political activism, criminal activities, and political control by elites. When the Internet became a paradise for entrepreneurs, youngsters starved for entertainment, organizers of any kind of events, and intelligence agencies at the same time, it means that in a sense the internet became a jungle, with many animals, beautiful and ugly, peaceful and dangerous. These general observations very much also apply to Pakistan. The internet brought new opportunities for Pakistan to develop into a progressive society and a more democratic country, and it opened doors for more forms of criminal activity (like fraud, child pornography, etc.), more intimidation and the spreading extremism, and more information gathering on citizens by business and state agents. It will be highly important to Pakistan to more actively and more successfully develop the positive sides of IT technology, internet services, and the social media, while at the same time check its excesses, problems and abuses.

FES Pakistan is delighted to present the report “Internet Landscape 2020” It is providing an excellent overview of internet usage, and on its dangers and opportunities. We hope, the report will facilitate a broad discussion about the use and further development of the internet in Pakistan, to fully turn it into another means for Pakistan to utilize its full potential and develop into a more progressive, citizen-oriented country.

Dr. Jochen Hippler

COUNTRY DIRECTOR

FES-PAKISTAN

Sidra Saeed

PROGRAMME COORDINATOR

FES-PAKISTAN

The year 2020 saw more downturns in Pakistan's internet landscape than ups.

In terms of access, the country saw accelerated growth in terms of adoption and usage, but this was less a result of successful policies, better services or an enabling environment and more the result of the COVID-19 crisis and nationwide lockdowns forcing citizens to turn to new means of communication, doing business, working from home, continuing education remotely etc. In all macroscopic studies and reports published in 2020, Pakistan maintained its position as one of the worst-ranked countries globally with regards to the internet in terms of almost all variables.

The government's much touted, 'Digital Pakistan' program - cited to be a gamechanger for the country's technological future - was essentially defunct by mid-year due to internal political struggles. The federal government and provinces did however continue to take steps towards e-governance and new, ICT-led services for citizens without an overarching plan in place. Positive strides were also seen on the fintech, e-commerce and online banking fronts with some improvements in policies and better, rapidly evolving services made possible in part due to the extraordinary circumstances the pandemic created.

The issue of online blasphemy accusations and campaigns continued to spiral out of control, with social media users able to target anyone with near complete impunity. Most online cases targeted minorities, members of the media or those teaching/studying in educational institutions.

Similar to blasphemy, little seemed to change with regards to child pornography, with large numbers of reported cases of child abuse - reflecting only a fraction of reality - and few arrests and court cases, with most action coming at the prompting of Interpol and European and international law enforcement agencies.

In sum, all cybercrime, be it harassment of women, hate speech against minorities, financial scams and cyber attacks, data breaches and sale of private information and more saw a marked increase - a fact recognized by the Federal Investigation Agency (FIA) Cybercrime Wing, who cited reporting trends five times higher than those seen the previous year. Clubbed with this was a sharp rise in disinformation. This proved to be especially dangerous in 2020 as a lot of disinformation focused on the pandemic, the coronavirus and government lockdowns, hampering efforts and causing panic.

In terms of speech and access to information, 2020 saw a further drop, with greater censorship led by state policies and efforts and exacerbated by an increasingly hostile environment for free speech online. Blanket bans on websites, online content, social media and apps with low to no transparency, using controversial laws and little to no explanations behind such actions was a recurring trend, as were increasing attacks and campaigns against journalists - and especially female journalists. Multiple journalists were also arrested on charges for alleged illegal online activity, only to be let go due to such charges holding no weight. And with the introduction of the Removal and Blocking of Unlawful Online Content Rules, 2020, the state has not only upped the ante in terms of censorship, it has also brought Pakistan to the brink of complete digital isolation with all major social media/internet companies threatening to end services in the country if pushed to comply with the new rules.

In all this, the state appeared to be a mix of misguided or willfully ignorant, lacking in resources and strategy, unable to turn ideas into action and in some cases, actively causing harm in order to maintain control over the internet. It is likely that the coming years will see a similar landscape, barring the inventiveness and resilience of private enterprise and citizens.

INTERNET ACCESS

ANALYSIS/OPINION

Parvez Iftikhar

ICT EXPERT

The problem Pakistan faces today is not that of internet coverage gaps as much as it is about the quality of coverage. Other than a dozen or so large cities, the quality and speed of the internet leaves a lot to be desired. Even in bigger cities, the quality and speed is reasonably good only in relatively affluent areas. It is due to the poor quality of coverage that students in many areas are unable to take online classes, and knowledge workers cannot do their work.

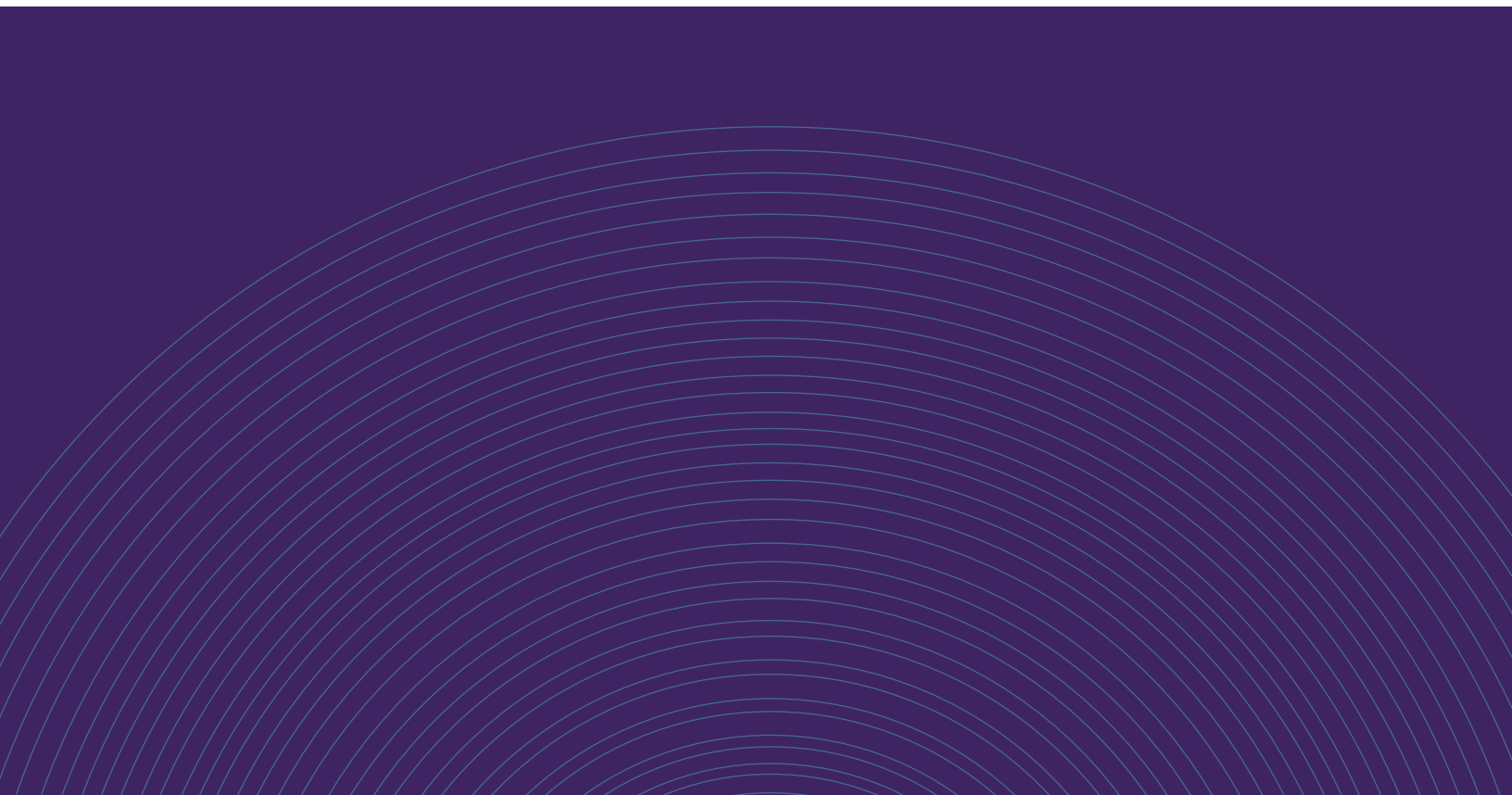
The telecom sector - which is all in the hands of private investors - is fulfilling its role as well as it can in the prevailing circumstances. However, it could do much better if there was more facilitation and enablement by the government, like rationalisation of taxes (Pakistan has some of the highest in the world), availability of spectrum (one of the lowest in the world), and penetration of optic fibre backbones (one of the lowest in the world).

In terms of a five-year plan, the state should focus on the following:

- 01 Facilitate and enable investors in the highly capital intensive (with long payback times) optic fibre cables domain.
- 02 Release more spectrum, while substantially reducing the floor prices in the spectrum auctions.
- 03 Reduce taxes on telecom equipment and services. The 12.5% advance tax on use of the internet specifically stands out; the poor cannot even adjust it against their final tax liabilities.
- 04 The government itself should become a major user of internet services e.g. by providing high capacity internet to all schools and hospitals, by computerising its day-to-day working.

For now, while 5G is a marvellous technology, its use cases have yet to be developed so it cannot be considered a game changer. Even the advanced countries are not really there as yet. Driverless cars, remote surgical procedures, Internet of things involving millions of devices all have yet to become relevant in a country like Pakistan. However, this

does not mean that we should sit back and do nothing. We should introduce 5G in pockets and encourage innovators and early adopters to come up with our own indigenous use cases. It is not difficult to imagine our youth coming up with fantastically innovative products. Then, it may become a game changer, otherwise it is just a “better 4G”.



Introduction

Access to the internet in Pakistan has been a mixed bag of remarkable growth and great potential marred by systemic issues coming to the fore across 2020. The COVID-19 pandemic profoundly shaped the future of internet access and use by highlighting the need for greater adoption and the glaring reality of inadequate infrastructure, ineffective or harmful legislation/policies and lack of awareness and education on internet use among the general public.

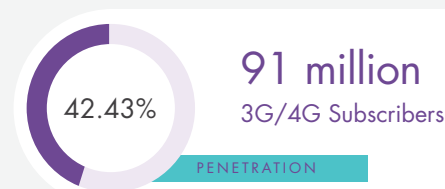
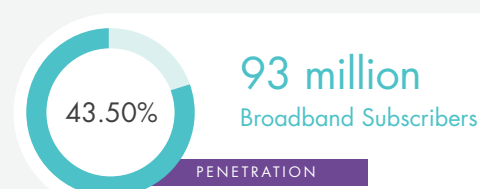
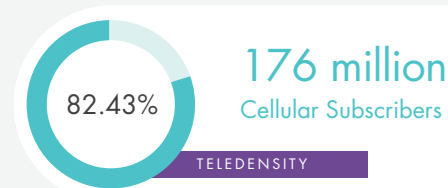
Despite the challenges, indicators recorded by the state regulator, the Pakistan Telecommunication Authority (PTA) showed consistent growth in internet penetration. According to the PTA Annual Report, 98% of households now own a mobile phone. Overall broadband penetration (cellular and fixed) has climbed from 22.6% in 2016-17 to 42.2% by October 2020. In particular, 4G subscriptions climbed by 60% in FY2020. More significantly, cellular data usage climbed from 2,545 petabytes in 2018-19 to 4,498 in 2019-20 indicating far greater and more meaningful internet use.¹

This encouraging growth however can be viewed as a consequence of acute need rather than clear direction and vision, as indicated by the following set of key reports released across 2020.

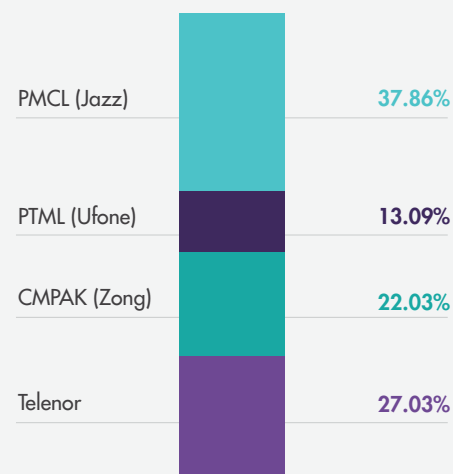
PTA INDICATORS

DECEMBER 2020

*Figures are updated as on December 2020



CELLULAR MARKET SHARE

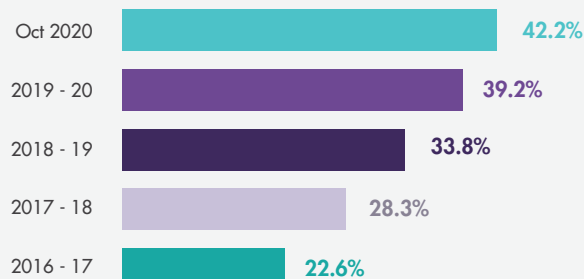


¹ Pakistan Telecommunication Authority. (2020). Annual Report 2020. PTA. https://www.pta.gov.pk/assets/media/annual_report_2020_15012021.pdf

PTA ANNUAL REPORT 2020

BROADBAND PENETRATION

Cellular BB & Fixed BB



(Petabytes)



INCLUSIVE INTERNET INDEX FINDINGS

Pakistan was ranked a low 76 out of 100 countries on the Inclusive Internet Index 2020 - a major global report released by the Economist Intelligence Unit (EIU) and commissioned by Facebook.²

The Index ranks countries from best to worst on benchmarks that include the internet's availability, affordability, relevance and the readiness of people to use it. The annual Index covered 100 countries, representing 91% of the global population and 96% of global GDP. Based on its findings, Pakistan ranked in the last quartile of the global index.

The Index report noted that Pakistan ranked 24 out of 26 Asian countries studied. Key failings included:

By far the largest gender gaps in the entire Index in both mobile and internet access

Low levels of digital literacy

Poor network quality

The acute gender gap in Pakistan in terms of mobile and internet access was 58% and 24% respectively, while the global averages were 26.5% and 19.8%. This was the highest gap recorded in the Index.

INCLUSIVE INTERNET INDEX 2020: PAKISTAN RANKINGS

Overall

76/₁₀₀

Availability

86/₁₀₀

Affordability

57/₁₀₀

Relevance

71/₁₀₀

Readiness

64/₁₀₀

² The Economist Intelligence Unit. (2020). Overall rankings - The Inclusive Internet Index. The Inclusive Internet Index 2020. <https://theinclusiveinternet.eiu.com/explore/countries/performance>

FREEDOM ON THE NET 2020

The annual Freedom on the Net 2020 report published by Freedom House ranked Pakistan's internet freedom as 'Not free' with a low score of 26 out of 100. Across the indicators, the country scored 5 out of 25 in terms of Obstacles to Access; 14 out of 35 in Access to Content; 7 out of 40 in Violation of User Rights.

The report noted that access was limited and internet use curbed or blocked due to a variety of reasons ranging from short-term shutting of internet connectivity in cities to long-term shutdown in far-flung regions.

"Underdeveloped infrastructure limits internet penetration rates in Pakistan, particularly in rural areas. However, mobile internet access is increasing. Pakistani authorities frequently disable internet access during times of perceived unrest; meanwhile, already long-term denial of service in marginalized areas persisted during the coverage period," the report stated.

Internet speed issues, lack of infrastructure, damaged infrastructure and power outages were also cited as ongoing issues. Similar to the Inclusivity Index, the report highlighted that "There are serious inequalities in access to information and communications technology (ICTs) based on geographic location, gender, and socioeconomic status."

Pakistan

26/100

A. Obstacles to Access	5/25
B. Limits on Contents	14/35
C. Violations of User Rights	7/40

LAST YEAR'S SCORE & STATUS

26/100

Scores are based on a scale of 0 (least free) to 100 (most free)

STATE BANK ANNUAL REPORT 2020

While noting substantial growth in internet penetration and use, the State Bank Annual report noted multiple shortcomings holding the country back.⁴

01

Pakistan has low unique mobile subscriber penetration and lower mobile internet penetration compared regionally.

02

Around 20% do not have access to mobile internet at all.

03

The digital divide in the economy is significant, including both coverage and usage gaps.

04

There is a rural/urban divide in mobile phone ownership.

05

Half the population has access to mobile broadband, but do not subscribe to internet bundles.

06

Gender inequality is stark and further hinders progress.

07

Inadequate levels of literacy results in low internet usage, with about half the population claiming it is not a useful or interesting activity.

The report listed a number of focus areas for the country:

- 01 Pakistan has to substantially upgrade its digital infrastructure.
- 02 The government authorities need to educate the population about the benefits of using digital services.
- 03 The government authorities need to incentivize marketplaces and shopping outlets to offer mobile wallet payments, which would help increase the use of e-commerce and financial services in general.
- 04 The federal and provincial governments must incentivize consumers, merchants, and other businesses to pay or receive their payments digitally.

SPEEDTEST GLOBAL INDEX: PAKISTAN RANKING

Out of 176 countries, on December 2020

MOBILE

Rank	Download	Upload	Latency
114 ⁻⁶	18.42	11.55	35
	Mbps	Mbps	ms

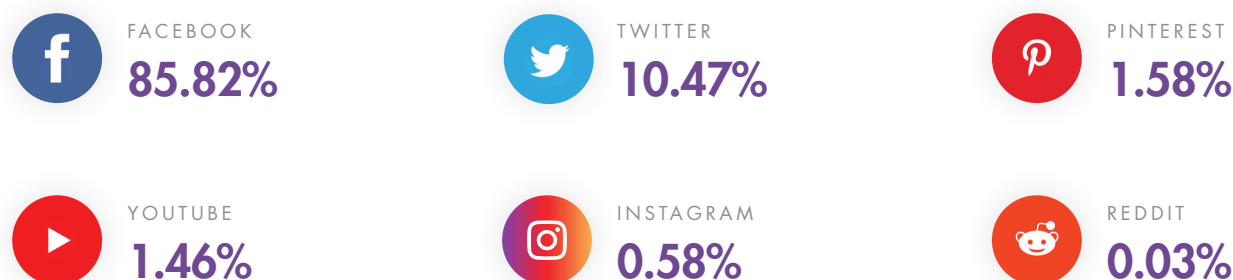
FIXED BROADBAND

Rank	Download	Upload	Latency
162 ⁻³	10.46	9.14	36
	Mbps	Mbps	ms

⁴ State Bank of Pakistan. (2020). The State of Pakistan's Economy, Annual Report 2020. SBP.

STATCOUNTER: PAKISTAN SOCIAL MEDIA STATS

January 2021



ACCESS TO REMOTE AREAS

Lack of access to the internet, particularly in the largely-neglected remote and rural areas of the country, proved to be hugely problematic as lockdowns came into force to control the pandemic across 2020. The state's failings on this front resulted in a string of protests and court cases.

The Education Crisis

Student protests and token hunger strikes over lack of internet access started in March and continued at different points across the year both online, as well as offline in front of press clubs, universities and on the roads. Most of the protests occurred in far-flung regions that have been chronically underserved. A nationwide lockdown was imposed by the government on March 23, by which time a majority of educational institutions had already shut down, forcing thousands of students from remote areas to return to their homes. Shortly after, universities began online classes

which a large number of students were unable to attend due to lack of access and poor connectivity/ internet speeds.⁵

In March and April, students from Khyber Pakhtunkhwa's tribal areas as well as those from Balochistan jointly protested over the lack of access during lockdown, using Twitter trends such as #Enable3G4GInExFATA and #SuspendOnlineClasses.

Additionally, hundreds of complaints by students and faculty were also reportedly lodged on the prime minister's portal with regard

to the online teaching system's quality of instruction, digital readiness of the instructor and poor internet connectivity. Students from Chitral highlighted that they were unable to attend a single online class due to no mobile signals. Some were forced to travel, "for two to three hours on a daily basis just to attend class. Students are spending 500 rupees or even more just for petrol for their vehicle. If we estimate this amount it almost equals to our university fee," a student claimed. Others shared that they were unable to afford the internet data packages required for

⁵ RFE/RL. (2020, April 14). Pakistani Court Orders Internet Access For Pashtun Students During Coronavirus Lockdown. Gandhara. <https://gandhara.rferl.org/a/pakistani-court-orders-internet-access-for-pashtun-students-during-coronavirus-lockdown/30554434.html>

⁶ Jahangir, R. (2020, April 1). Call for access to quality, affordable internet amid Covid-19 outbreak. Dawn. <https://www.dawn.com/news/1545471/call-for-access-to-quality-affordable-internet-amid-covid-19-outbreak>

During one protest in Quetta, police arrested 100 students who were demanding Internet access by taking to the streets. Such street protests were also seen in Gilgit-Baltistan.⁷

Protesters in Balochistan argued that online classes could not take place in the province as a majority of areas do not have fiber-optic cables, while nine of 32 districts have no mobile internet services. A petition was also submitted by students to the Balochistan High Court.⁸

In light of the protests, the Islamabad High Court (IHC) ordered the government to restore the internet to parts of Khyber Pakhtunkhwa following a case filed by a student who was unable to attend online classes. The judge, IHC Chief Justice Athar Minallah, expressed surprise at learning that seven tribal districts - part of the former Federally Administered Tribal Areas (FATA) - were lacking internet access.⁹

The student's counsel had argued that access to the internet was a fundamental right guaranteed under Articles 19 and 19-A of the Constitution. He argued that the

students and people of these districts could not be denied access to the internet, particularly when students were required to attend online classes due to the lockdown. The information technology ministry informed the court that the interior ministry had suspended the internet in certain former tribal areas in 2016 citing security reasons, following which they were never restored. It is to be noted that the Supreme Court had earlier set aside an IHC verdict that had barred the government from suspending services.¹⁰

For its part, the HEC acknowledged the stream of complaints, noting that many were related to poor internet connectivity which hampered participation in online classes, particularly in tribal areas of Khyber Pakhtunkhwa, parts of Balochistan, Gilgit-Baltistan (GB) and Azad Jammu and Kashmir (AJK). The HEC later issued a notification asking all varsities that were not ready for online instructions due to technological, technical or spatial issues to plan, acquire, train, and equip themselves to execute online teaching from June.¹²

In response to the crisis, Khyber

Pakhtunkhwa lawmakers adopted a unanimous resolution calling on federal authorities to "provide Internet on an emergency basis" to the deprived tribal districts. "In the 21st century, districts from Bajaur to South Waziristan are deprived of 3G and 4G networks or any Internet connectivity," lawmaker Mir Kalam Wazir told Khyber Pakhtunkhwa's provincial assembly on July 6, terming it a huge issue. In a news report, Usama Khilji, the director of Internet freedom and advocacy watchdog Bolo Bhi said there was little evidence that shutting internet services would protect communities.

"The Pakistani state often cites security reasons for denying the basic right of the Internet, which is linked to accessing the right to freedom of expression and the right to information... This narrative must be challenged, as millions of Pakistanis are being denied the basic linked rights of education and access to critical health-related information, as well."¹³

⁷ Siddique, A. (2020, July 9). Despite Protests And Promises, Pakistani Regions Denied Internet Access. Gandhara. <https://gandhara.rferl.org/a/despite-protests-and-promises-pakistani-regions-denied-internet-access/30716739.html>

⁸ Baloch, S. M., & Musyani, Z. (2020, July 8). Pakistan's Great Digital Divide. The Diplomat. <https://thediplomat.com/2020/07/pakistans-great-digital-divide/>

⁹ RFE/RL. (2020, April 14). Pakistani Court Orders Internet Access For Pashtun Students During Coronavirus Lockdown. Gandhara. <https://gandhara.rferl.org/a/pakistani-court-orders-internet-access-for-pashtun-students-during-coronavirus-lockdown/30554434.html>

¹⁰ Asad, M. (2020, May 12). IHC seeks help in plea demanding 3G/4G services in tribal areas. Dawn. <https://www.dawn.com/news/1556489/ihc-seeks-help-in-plea-demanding-3g4g-services-in-tribal-areas>

¹¹ Abbasi, K. (2020, June 16). Students protest 'faulty' online system, charging of fee by varsities. Dawn. <https://www.dawn.com/news/1563770/students-protest-faulty-online-system-charging-of-fee-by-varsities>

¹² Jahangir, R. (2020, April 1). Call for access to quality, affordable internet amid Covid-19 outbreak. Dawn. <https://www.dawn.com/news/1545471/call-for-access-to-quality-affordable-internet-amid-covid-19-outbreak>

¹³ Siddique, A. (2020, July 9). Despite Protests And Promises, Pakistani Regions Denied Internet Access. Gandhara. <https://gandhara.rferl.org/a/despite-protests-and-promises-pakistani-regions-denied-internet-access/30716739.html>

As noted in multiple reports, the Universal Service Fund (USF), a public-private partnership that receives a small percentage of the annual revenue from private telecommunication companies, is tasked with increasing internet access, especially to remote areas, but is limited by security concerns raised by the military.

Last year, the USF awarded a Rs258 million contract to Jazz to deploy broadband services in North Waziristan as well as to provide mobile broadband access to Bannu and Lakki Marwat. But as noted by a Jazz spokesperson in a Dawn report, “Jazz is committed to providing efficient connectivity to underserved or unserved areas. However,

presently, force majeure applies to the Waziristan region. Telecom companies are not permitted to provide data services due to security concerns at present”. In the same news report, a telecom industry source shared that, “The people of AJK and GB have a right to meaningful digital services and solutions that can address social, economic and environmental problems and close the inequality gap. We believe that the people of AJK and GB are deprived of 3G/4G service that is essential in bridging the digital divide and opening up access to essential digital services... Mobile internet is playing a key role in helping people deal with Covid-19 related shutdowns. Now more than ever before, the people of AJK and

GB need these services as much as their fellow citizens in the rest of the country.”¹⁴

Specific to Gilgit Baltistan, a protesting student pointed out to The Diplomat that, “The Pakistan Army has a monopoly of providing internet in Gilgit Baltistan, as the only service we have had for years was SCOM, a mobile network by the Special Communications Organization (SCO). Recently, Telenor opened its services in the region. But all companies have to take permission from the Army for opening their services. The Army should invite other companies to invest in the region.” The SCO is operated by the military to provide services in Jammu and Kashmir and GB.¹⁵

A report in TRT World noted that:

01

Although the CPEC Authority of Pakistan promised high-speed internet coverage for GB, there had been no attempt during the lockdown to connect the region to CPEC’s network. In fact, the internet has only been made functional for Islamabad.

02

The SCO has blocked private sector competition in the past, and effectively ensured its monopoly over Internet services in the region, going as far as to label those critical of its services as “anti-state” in an official Twitter statement.

03

Telenor, the only mobile internet provider allowed in parts of AJK, stated in a tweet that additional spectrums needed for the improvement of internet services in the region have not been auctioned despite repeated requests, while digital services in the rest of the country have been readily upgraded.¹⁶

¹⁴ Jahangir, R. (2020, April 1). Call for access to quality, affordable internet amid Covid-19 outbreak. Dawn. <https://www.dawn.com/news/1545471/call-for-access-to-quality-affordable-internet-amid-covid-19-outbreak>

¹⁵ Baloch, S. M., & Musyani, Z. (2020, July 8). Pakistan’s Great Digital Divide. The Diplomat. <https://thediplomat.com/2020/07/pakistans-great-digital-divide/>

¹⁶ Haq, M. (2020, July 30). Pakistan’s digital exclusion cripples life in the pandemic. TRT World. <https://www.trtworld.com/magazine/pakistan-s-digital-exclusion-cripples-life-in-the-pandemic-38503>

CPEC and the promise of connectivity

In a major development in 2020, the China-Pakistan Fiber Optic Project (CPFOP) aimed at digital connectivity between China and Pakistan became operational. The development gives Pakistan an alternative route for internet traffic, as the country was previously reliant on submarine cables along the coast. The project, which includes over 800km of optical fiber cable from Rawalpindi to Khunjerab, is estimated to benefit 17 million people.¹⁷

Phase two of the Pak-China fibre optic cable would reportedly be laid along three main routes of the China-Pakistan Economic Corridor (CPEC), including railway tracks. The National Highway Authority (NHA) and Pakistan Railways would also work on laying the fibre optic cable on motorways and Pakistan Railways' ML-I project. The second phase of the project was reported to cost Rs29 billion.¹⁸

Later in the year, the Central Development Working Party (CDWP) cleared five development projects at a cumulative cost of about Rs54 billion, including Rs38bn second phase of laying the cross-border optic fibre cable with China (Khunjerab-Gwadar-Karachi).¹⁹

Additionally, the Ministry of Information Technology and Telecommunication approved 11 projects

worth Rs11.52 billion. Of these, five would be developed in the underserved areas of AJK and G-B.

The projects include:

- President Initiative for Cyber Efficient Parliament
- Expansion of Broadband Services in AJK and G-B Phase-II
- Establishment of Optic Fibre Base Communication Link between Karachi and Gwadar Along Coastal Highway
- Implementation of PECA 2016 and SRO 904 (I)/2017 for DIRBS (Device Identification, Registration and Blocking System) AJK and G-B
- Upgrading of Transmission Network and Replacement of Optic Fibre Cable in AJK and G-B.

A Dawn report cited that infrastructure development continues for a third submarine cable for Pakistan's internet traffic, with the project expected to come online by 2021. A fourth company is also planning to bring a submarine cable with its landing station in Gwadar. It will run along the coastal highway up to Karachi.²¹

¹⁷ APP. (2020, July 19). Pak-China fiber optic cable becomes operational: CEN. The Nation. <https://nation.com.pk/19-Jul-2020/pak-china-fiber-optic-cable-becomes-operational-cen>

¹⁸ Bhutta, Z. (2020, February 20). Pakistan plans second phase of Pak-China fibre optic cable. The Express Tribune. <https://tribune.com.pk/story/2160351/2-pakistan-plans-second-phase-pak-china-fibre-optic-cable>

¹⁹ The Newspaper's staff reporter. (2020, December 3). Rs38bn cross-border optic fibre project under CPEC cleared. Dawn. <https://www.dawn.com/news/1593711/rs38bn-cross-border-optic-fibre-project-under-cpec-cleared>

²⁰ Our Correspondent. (2020, April 8). IT ministry approves 11 projects worth Rs11.5b. The Express Tribune. <https://tribune.com.pk/story/2193026/2-ministry-ap-proves-11-projects-worth-rs11-5b>

²¹ The newspaper's staff reporter. (2020, September 13). Internet use rose 25pc during pandemic-induced lockdowns. Dawn. <https://www.dawn.com/news/1579433>

USF efforts in remote areas

MARCH

The Ministry of IT and Telecommunication reported that projects awarded through the USF in 2019-20 had resulted in mobile broadband access being provided to over nine million citizens across 13 districts. The ministry further reported plans to award contracts for projects in Sanghar (Umerkot & Sanghar), Muzaffargarh (Muzaffargarh & Rajanpur), Kurram (Kurram), Bolan (Kacchi-Bolan & Jhal Magsi) and Jaffarabad (Jaffarabad, Sohbatpur and Nasirabad).²²

APRIL

The USF awarded Jazz a Rs92 million contract to develop broadband internet in Kurram Lot district of Khyber Pakhtunkhwa. The project aimed to provide access to over 0.44 million citizens.²³

AUGUST

The USF reported that 285 kms of optic fiber cable had been laid out to connect nine areas in North Waziristan, South Waziristan and FR Tank. The optic fiber would provide connectivity to Shewa, Spinwam, Wana, ToiKhulla, Jandola, Sarwakai, Tanai, Sararogha and Barwand tehsils in Waziristan. It was further reported that the USF board had approved contracts to Zong for Jaffarabad Nasirabad and Sohbatpur districts, through which a population of approximately 0.4 million would have access to mobile broadband. The board also approved broadband service in Ghotki, Sukkur and Khairpur districts to benefit around two million citizens.²⁴

OCTOBER

Contracts worth Rs1.3 billion were awarded to Jazz and Ufone by USF to bring mobile broadband to parts of Balochistan and Sindh, specifically, Khairpur, Sukkur and Ghotki in Sindh (Jazz), and Bolan, Jhal Magsi, Ziarat and Kalat in Balochistan (Ufone). In total, the projects would cover an area of 34,660 square kilometres.²⁵

OCTOBER

USF awarded contracts worth Rs5.11 billion to Telenor, Zong, Ufone and PTCL under the Next Generation Broadband for Sustainable Development and Next Generation Optical Fibre Network and Services programs. Areas to be served included Kashmore, Ghotki, Sukkur and Khairpur districts of Sindh (PTCL); Chitral, Upper Dir and Lower Dir districts in Khyber Pakhtunkhwa (Telenor); Karachi West and Malir districts in Sindh (Zong); Mastung and Ziarat districts in Balochistan (Ufone).²⁶

DECEMBER

Contracts worth approximately Rs8.81 billion were awarded by USF to Telenor, Ufone, Jazz and PTCL to provide internet services to unserved and underserved areas of Punjab, Sindh, Balochistan and the tribal areas of Khyber Pakhtunkhwa. It was shared that in the first half of FY 2020-21, the USF board had approved a record number of projects worth over Rs13.92 billion that would impact over 10 million people.²⁷

²² Sheikh, A. (2020, March 20). High-speed Internet Reaching Remote Parts of Pakistan. Mashable Pakistan. <https://pk.mashable.com/digital-pakistan/2000/high-speed-in-ternet-reaching-remote-parts-of-pakistan>

²³ Abbas, G. (2020, April 21). Jazz awarded contract for provision of broadband services in ex-FATA. Profit Magazine. <https://profit.pakistantoday.com.pk/2020/04/21/jazz-award-ed-contract-for-provision-of-broadband-services-in-ex-fata/>

²⁴ Warriach, F. (2020, August 19). Optic fiber cable laid to connect 9 unserved tehsils in North and South Waziristan. Mashable Pakistan. <https://pk.mashable.com/broadband/4713/optic-fi-ber-cable-laid-to-connect-9-unserved-tehsils-in-north-and-south-waziristan>

²⁵ Ali, K. (2020, October 1). IT can lead to growth in export of services: PM. Dawn. <https://www.dawn.com/news/1582532/it-can-lead-to-growth-in-export-of-services-pm>

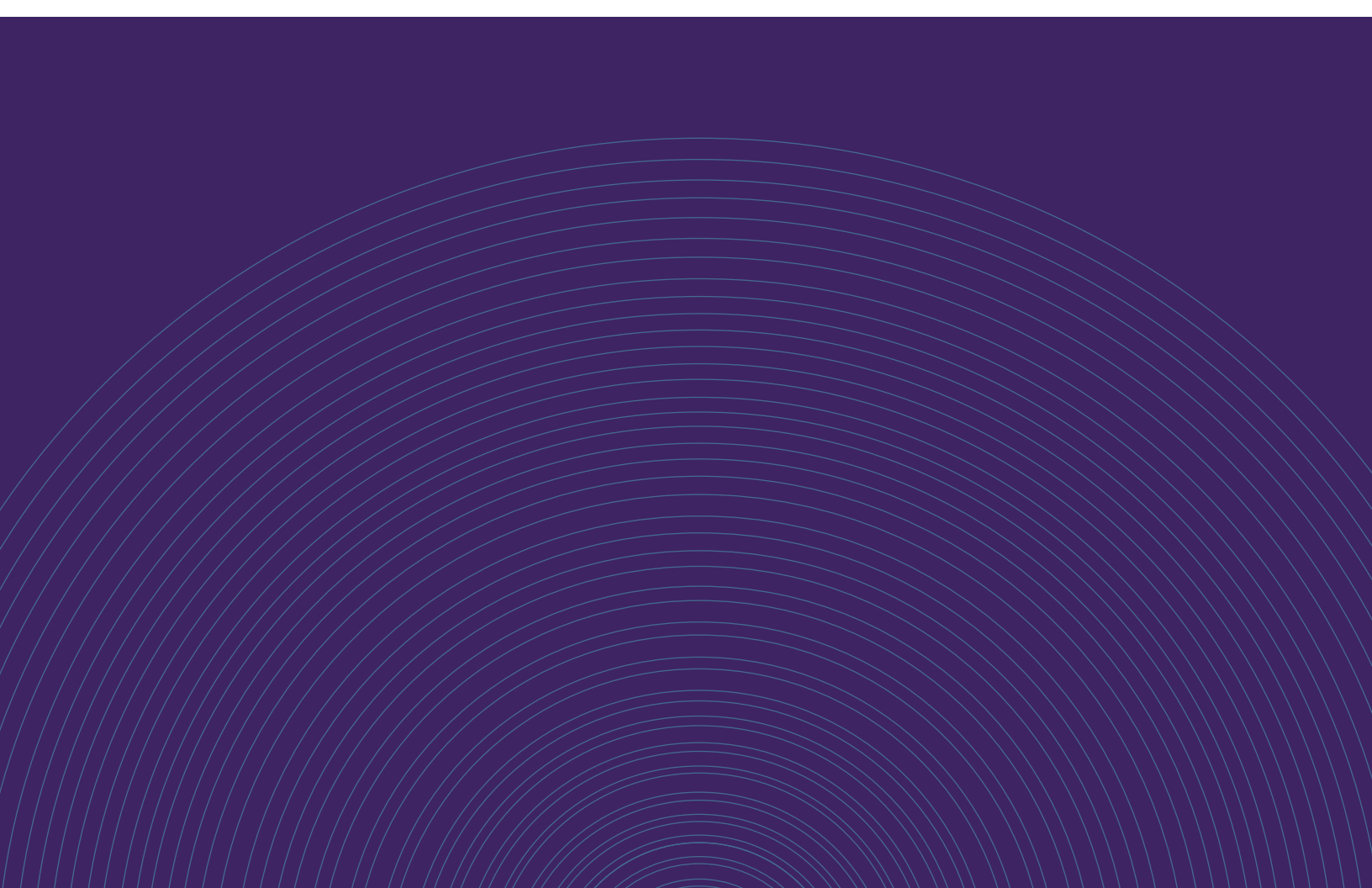
²⁶ The newspaper's staff reporter. (2020, October 20). Rs5.1bn broadband contracts awarded. Dawn. <https://www.dawn.com/news/1586020/rs51bn-broadband-contracts-awarded>

²⁷ Ali, K. (2020, December 1). High-speed mobile broadband facility for un-served, under-served areas soon. Dawn. <https://www.dawn.com/news/1596973/high-speed-mobile-broad-band-facility-for-un-served-under-served-areas-soon>

Separately, the government submitted a project to the World Bank, seeking \$200 million to work on critical digital infrastructure, platforms and supporting regulations for digital services. The project was to be implemented in Islamabad, provincial capitals and select second and third tier cities to expand broadband infrastructure. The project was submitted as part of the World Bank's assistance programme to Pakistan after the coronavirus pandemic. The Ministry of

Information Technology and Telecommunications was cited to lead implementation, however it was noted that the ministry had no previous experience with IDA-financed operations; did not have in-house environmental or social unit or staff; did not have experience of obtaining national environmental clearances and had no experience of working with international financial institutions during the last three years that required implementation of safeguard policies.²⁸

²⁸ Ahmed, A. (2020, October 20). Govt seeks \$200m IDA loan to strengthen digital connectivity. Dawn. <https://www.dawn.com/news/1585776/govt-seeks-200m-ida-loan-to-strengthen-digital-connectivity>



The promise of 'Digital Pakistan'

In December 2019, the PTI-led government announced its ambitious 'Digital Pakistan' vision - an all encompassing program that would launch Pakistan into the modern age. The focus of the initiative was spelled out by Tania Aidrus, a senior Google executive who quit her position to lead the initiative²⁹ as special assistant to the prime minister (SAPM) on Digital Pakistan:

1. Access and Connectivity that ensures every Pakistani has access to the internet that is a fundamental right that we need to make available universally and especially to underserved populations.
2. Digital Infrastructure that creates the ability to do most daily tasks using smart-phones in a secure and faster manner.
3. E-Government that digitises intra-government operations and processes towards a paperless and efficient environment and also digitises government services for citizens and businesses for better delivery.
4. Digital Skilling and Literacy that enables our tech graduates to secure relevant jobs. A majority of our tech graduates today cannot compete globally because our curriculum is outdated and barring them from monetising those skills.
5. Innovation and Entrepreneurship that provides an enabling environment for startups to flourish.

²⁹ Dawn.com. (2019, December 5). 'Full potential of youth, women will be unleashed,' says PM on launch of Digital Pakistan Vision. Dawn.com. <https://www.dawn.com/news/1520609>

Prime Minister Imran Khan saw this as a platform for the youth of Pakistan to become the drivers of economic growth. The government cited lofty goals such as increasing the size of the Information and Communication Technology (ICT) industry to \$20 billion in the next few years.³⁰

This promise, which was centered around Aidrus' leadership, came to an abrupt end in July, when she resigned from her post, allegedly for criticism levelled against her for holding dual citizenship.³¹

Multiple news reports that followed however saw this chapter of 'Digital Pakistan' come to an end as a result of a political fallout. Profit Magazine cited sources who shared that the 'resignation' was planned months in advance after PTI leader Jehangir Tareen, who got embroiled in a sugar price corruption scandal, fell out of favor. It was shared that Tareen was the one who arranged the meeting between Aidrus and the PM last year that materialized into 'Digital Pakistan', and this connection to Tareen was seen as a problem. Additionally, there were difficulties between Aidrus and CEO of National

Information Technology Board (NITB) Shabaha Ali Shah. The report made the claim that Aidrus was sacked, being forced to sign a resignation letter.³²

A report in The News further shared that Aidrus was considered in the "Tareen" camp within the government, which made bureaucrats hostile to her and the initiative. This political tussle meant there were few to no government resources, staff or independent office afforded to the Digital Pakistan initiative.³³

*At best, the Digital Pakistan conceived by the premier and Tania Aidrus was still born.*³⁴

Official source on 'Digital Pakistan' and the resignation of Tania Aidrus

A Dawn report highlighted a further controversy surrounding Aidrus in the registering of a not-for-profit company named the Digital Pakistan Foundation (DPF). The founding directors of the company included Aidrus and Tareen, raising concerns about a conflict of interest, as well as issues regarding lack of transparency around the foundation's funding.³⁵

³⁰ APP. (2020, February 20). Digital Pakistan: Imran aims to increase scope of ICT industry by \$20b. The Express Tribune. <https://tribune.com.pk/story/2160331/2-digital-pakistan-imran-aims-increase-scope-ict-industry-20b>

³¹ Web Desk. (2020, July 29). Tania Aidrus resigns as SAPM on Digital Pakistan. The Nation. <https://nation.com.pk/29-Jul-2020/tania-aidrus-resigns-as-sapm-on-digital-pakistan>

³² Staff Report. (2020, July 29). Tania Aidrus was sacked, did not resign. Profit Magazine. <https://profit.pakistantoday.com.pk/2020/07/29/tania-aidrus-was-sacked-did-not-resign/>

³³ Butt, T. (2020, August 1). Why Dr Mirza and Tania Aidrus have to pack their bags. The News. <https://www.thenews.com.pk/print/695144-why-dr-mirza-and-tania-aidrus-have-to-pack-their-bags>

³⁴ Butt, T. (2020, August 1). Why Dr Mirza and Tania Aidrus have to pack their bags. The News. <https://www.thenews.com.pk/print/695144-why-dr-mirza-and-tania-aidrus-have-to-pack-their-bags>

³⁵ Jahangir, R. (2020, June 24). Company linked to PM's Digital Pakistan unit stirs controversy. Dawn. <https://www.dawn.com/news/1564826>

E-GOVERNANCE EFFORTS

In parallel to the controversy surrounding 'Digital Pakistan', ad hoc government initiatives continued to be launched, as was seen in previous years, with the Federal and Punjab governments leading most such efforts. A number of unique and/or major efforts are outlined below, as reported in the media.

Note: For SBP and finance-related efforts, please see sections: Fintech & Online Banking, E-commerce. For PTA and internet/telco-related efforts, please see sections:

Internet Access, Censorship & Media, Data Protection & Privacy.

Bureaucracy, ministries and local government

CITY ISLAMABAD MOBILE APP SUCCESS

One success story of the year was the City Islamabad mobile app developed by the National Information Technology Board (NITB), which generated over Rs250 million in revenue since its inception more than a year ago. The app, which allows Islamabad citizens to quickly avail services from 40 plus government departments including police, excise and taxation, CDA, NADRA etc. is set to be developed further with the inclusion of more payment options within the system.³⁶

E-GOVERNANCE IN ALL MINISTRIES

The Ministry of Information Technology and Telecommunication announced it would complete the task of introducing e-governance systems in all ministries by the end of the year. The ministry shared that "e-office" systems were implemented in 31 ministries so far, and only 11 ministries and divisions remained.³⁷

FM DIRECT

Foreign Minister Shah Mahmood Qureshi launched the 'FM Direct' mobile app for internal communications between him and officers of the ministry - a first for the institution in terms of allowing officers of all grades and locations to have easy access to the FM. The Foreign Office also introduced "e-office" systems and invested in secure, encrypted video conferencing facilities connecting it with its missions across the world. The FM reportedly started conducting 'FM Connect coffee mornings' to talk to a range of stakeholders each month.³⁸

BALDIA ONLINE

The Punjab government launched a mobile app "BALDIAONLINE" which brought together all 455 local governments online to provide citizens with services such as certificates and registration of birth, death, marriage and divorce cases. The app was also aimed to give access to Pakistanis living abroad. It also aimed to become the Reporting and Complaints Management Information System of local government and community development (LG&CD) department.³⁹

³⁶ ASaeed, F. (2020, December 26). NITB's City Islamabad app generates over PKR250 million in revenue - Tech, Mashable Pakistan. <https://pk.mashable.com/tech/6663/nitbs-city-islamabad-app-generates-over-pkr250-million-in-revenue>

³⁷ APP. (2020, January 17). IT ministry confident to introduce E-governance system in all ministries by year end. The News. <https://www.thenews.com.pk/print/599852-it-ministry-confident-to-introduce-e-governance-system-in-all-ministries-by-year-end>

³⁸ Our Correspondent. (2020, April 17). Qureshi launches 'FM Direct' amid Covid-19. The Express Tribune. <https://tribune.com.pk/story/2200421/1-qureshi-launches-fm-direct-amid-covid-19>

³⁹ The Newspaper's Staff Reporter. (2020, August 18). Local governments are now online. Dawn. <https://www.dawn.com/news/1574950>

PBS DASHBOARDS

The Pakistan Bureau of Statistics (PBS) launched two data-driven dashboards as part of its Digital Transformation initiative to compile and disseminate information effectively. The dashboard on the Pakistan Social and Living Standards Measurement (PSLM) would provide data about education, ICT, health, population welfare, water, sanitation and Hygiene, Household Integrated Economic Survey (HIES) and Food Insecurity Experience Scale (FIES).⁴⁰

Transport

GIS INITIATIVE

The National Highway Authority (NHA) launched a Geographic Information System (GIS) project to create a geo-database of its entire network across Pakistan. The project would digitise information

MOHAFIZ APP EXPANDED

The country's emergency services mobile app Mohafiz expanded to include reliable care assistance, a first-of-its-kind service among the private sector startups. The app, which was launched in 2015, now gives citizens access to a broad range of services related to health and emergencies ranging from harassment, robbery and kidnapping to natural disaster.⁴¹

regarding utilities and commercial amenities in the Right of Way (ROW) of the NHA network. The project, commenced in June 2019, aimed to be completed in 18 months.⁴²

Law enforcement

'ONE-WINDOW' LICENSES

Rawalpindi traffic police introduced a one-window operation to provide driving licences without any human intervention, including booking an appointment using a mobile app. This was touted to be the first police department in the country to launch a truly automated, one-window operation that would additionally not involve any paper-based forms when seeking a new license or renewing an expired one. One aim of such a system was to end corrupt practices of using influence to get processed out-of-turn.⁴³

DIGITIZED INMATE DATA

The Punjab Information Technology Board (PITB) achieved digitization of 80% of data related to the inmate population in Punjab using the Prison Management Information System (PMIS), alongwith automation of employees and visitors' profiles. The data included 279,860 prisoners' profiles, 189,220 visitors' profiles, 708,393 jails visit records and 14,600 employee profiles. The data included information about legal histories of inmates such as date of admission, fingerprints, court dates, jail transfers, medical histories, parole and crime details. The PMIS system was set to be integrated with the Home Department, Punjab Police, Lahore High Court and The Anti-Corruption

⁴⁰ AAP, (2020, November 10). PBS launches dashboards. Associated Press of Pakistan. <https://www.app.com.pk/business/pbs-dashboard/>

⁴¹ Haq, S. (2020, September 16). Emergency service app enters reliable care field. The Express Tribune. <https://tribune.com.pk/story/2264149/emergency-service-app-enters-reliable-care-field>

⁴² Anjum, S. (2020, May 11). NHA to enhance revenue through digitising database. The News. <https://www.thenews.com.pk/print/657220-nha-to-enhance-revenue-through-digitising-database>

⁴³ Asghar, I. (2020, June 5). Driving licences now just an app away _ The Express Tribune. The Express Tribune. <https://tribune.com.pk/story/2235810/8-driving-licences-now-just-app-away?amp=1>

⁴⁴ Warraich, F. (2020, July 15). PITB has digitized 80 per cent of inmates' population across Punjab. Mashable Pakistan. <https://pk.mashable.com/tech/4121/pitb-has-digitized-80-per-cent-of-inmates-population-across-punjab>

SAFETY APP FOR WOMEN

The Punjab police department launched a safety app for women that could be used across the province to report suspicious activities or when faced with safety concerns. The app required women to register themselves to get help from the Emergency Helpline 15, Rescue 1122, Highway Police, and Motorway Police in case of an emergency.⁴⁵

Food

WHEAT REGULATION

Aimed at preventing hoarding and price gouging, the Punjab Information Technology Board (PITB) developed software to help the province's food authorities track and regulate wheat and flour delivery in the market. Flour mill operators would have to record how much flour they supplied to dealers daily in the Flour Ledger Management Information System (FLMIS), developed by PITB. An SMS system would require dealers to confirm how much flour was supplied from which mill. The software would be introduced with a new system that makes it mandatory for flour dealers in Punjab to hold food grain licences.⁴⁷

Jobs

OEC PORTAL FOR THE JOBLESS

The Overseas Employment Corporation's (OEC) portal saw success in registering over 50,000 Pakistani workers who had lost their overseas jobs in the wake of the pandemic. The portal allowed registered users to search for job

E-CHALLAN

The Punjab Safe City Authority (PSCA) launched a traffic challan e-payment system in Lahore to allow citizens to submit their payments online rather than by visiting a bank. The new 3-payment system would also allow the withdrawal of documents on the spot by submitting challans from mobile phones, online or ATMs.⁴⁶

EHSAA ONLINE

The government set up an SMS service (8171) to allow needy and destitute families to register themselves for aid during the pandemic. This was an extension of the Ehsaas Emergency Program, which would provide impoverished families Rs12,000 for monthly upkeep. The government also launched the Ehsaas Ration Platform by which people wishing to donate food or rations could connect with people in need. As early as April, almost 35,000 families and over 600 donors had registered on the platform.⁴⁸

opportunities, training in modern skills and seek financial assistance. The government also planned to provide technical and financial assistance to some workers under the Kamyab Jawan and Ehsaas programmes.⁴⁹

⁴⁵ Saeed, F. (2020, November 10). Punjab Police launches women safety app for improved security. Mashable Pakistan. <https://pk.mashable.com/tech/5815/punjab-police-launches-women-safety-app-for-improved-security>

⁴⁶ Saeed, F. (2020, November 21). PSCA formally launches online payment of e-challan in Lahore. Mashable Pakistan. <https://pk.mashable.com/digital-payment/6039/psca-formally-launches-online-payment-of-e-challan-in-lahore>

⁴⁷ Asif, R. (2020, July 9). Punjab develops IT solution to wheat problem. The Express Tribune. <https://tribune.com.pk/story/2253964/punjab-develops-it-solution-to-wheat-problem>

⁴⁸ Khan, Z. (2020, April 1). Impoverished families can now SMS on 8171 and request aid via Ehsaas Emergency Program - Digital Pakistan. Mashable Pakistan. <https://pk.mashable.com/digital-pakistan/2305/impoverished-families-can-now-sms-on-8171-and-request-aid-via-ehsaas-emergency-program>

⁴⁹ APP. (2020, July 27). OEC portal registers 50,000 expelled overseas workers. The Nation. <https://nation.com.pk/27-Jul-2020/oec-portal-registers-50-000-expelled-overseas-workers>

Tourism

PUNJAB TOURISM APP

The Punjab government launched the Punjab Tourism App to assist people who wished to explore different sites in the province. The new app contained details of more than 500 different sites of

interest for tourists, including information on national heroes, famous hotels along with contact information, as well as providing safe routes to various destinations.⁵⁰

Persons with disabilities

EQUAL ACCESS LAUNCH

The Special Talent Exchange Program (STEP) developed a mobile phone app “Equal Access” with support of British Council and in collaboration with Pakistan Telecommunication Authority (PTA) to offer support to persons with disabilities. The app would provide information in accessible formats including sign language interpretation, sound description, dark mode and resizable text formats. Equal Access also contained information related to disability services, stakeholders and laws in Pakistan.⁵¹

APP FOR CHILDREN

The government launched a mobile app for parents of differently-abled children to help them access training and rehabilitation services available in Pakistan. The app would guide parents in selecting an educational institution for their children and assist in applying for admission online. The development of the app was touted to bring approximately 30,000 out of school differently-abled children into the educational system.⁵²

Judicial system

E-COURT SYSTEM

An E-court system that was developed to allow connectivity between the Supreme Court in Islamabad and its registries in the provinces was put

into use for the first time this year, beginning with Karachi. The system would facilitate speedy disposal of outstanding legal matters in the

⁵⁰ News Desk. (2020, September 27). Punjab launches 'Tourism App' to facilitate potential tourists. Global Village Space. <https://www.globalvillagespace.com/tourism-app/>

⁵¹ PTA. (2020, November 24). App for persons with disabilities launched. Pakistan Telecommunication Authority. <https://www.pta.gov.pk/en/media-center/single-media/app-for-persons-with-disabilities-launched-241120>

⁵² Our Correspondent. (2020, October 23). Special education app launched. The Express Tribune. <https://tribune.com.pk/story/2269573/special-education-app-launched>

⁵³ Asad, M. (2020, May 24). In a first, SC to use e-Court system. Dawn. <https://www.dawn.com/news/1484248>

Education

CORONAVIRUS INITIATIVES

The Higher Education Commission (HEC) issued a host of guidelines and recommendations to educational institutions to switch to online/distance learning classes following the pandemic and related lockdowns.⁵⁴ (Read more in section: Internet Access)

ONLINE LIBRARY

The Sindh Culture, Tourism, and Antiquities Department launched a digital library to give free access to over 100 million books, research journals, and periodicals focused on the history and civilization of Sindh. The portal would also give access to books and research journals available at different academic and research institutions globally as part of a barter system developed in the open source database.⁵⁵

⁵⁴ Naqvi, Z. (2020, March 30). HEC instructs educators to start e-learning by June 1. The Express Tribune. <https://tribune.com.pk/story/2187052/1-hec-instructs-educators-start-e-learning-june-1>

⁵⁵ News Report. (2020, October 8). Over 100m books available for free from Sindh's new digital library. The News. <https://www.thenews.com.pk/print/726320-over-100m-books-available-for-free-from-sindh-s-new-digital-library#:~:text=KARACHI%3A%20Sindh%20Culture%2C%20Tourism%2C,civilization%20of%20Sindh%2C%20foreign%20media>

BLASPHEMY

ANALYSIS / OPINION

Arafat Mazhar

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Social media is very readily and ubiquitously weaponized against individuals, now more than ever before. This is especially true for individuals who present alternate opinions, perspectives and ways of living. Even platforms that enjoyed relative relief from moral policing where users had greater freedom to express themselves, like TikTok, have been compromised.

Sadly, it doesn't take long for viral videos to endanger others; in fact, tweets and hashtags can suffice too, as we saw in the case of one high school student accusing another of blaspheming over a petty dispute and calling for their murder, and when #ArrestMarviSirmed_295C started trending after she made a satirical tweet about the plight of Baloch missing persons.

Experience indicates that calls for outright repeal of the blasphemy law further polarizes and entrenches extremist narratives surrounding them. The conversation on blasphemy online seems to occur in echo-chambers, with those who want reform rarely engaging with those that defend the law. Part of the reason for this lack of engagement is the very real threat to human life faced by those who are vocal about issues with the way blasphemy operates in Pakistan but beyond risk assessment we also lack the language needed to create meaningful discourse between differing opinions on blasphemy.

While the internet has provided opportunities to marginalized groups around the world to find and create communities where they can express themselves, these communities need to be private to be safe in Pakistan. As far as the public part of the internet is concerned, the expression of differing religious beliefs can be and often is attacked. This is true not just of differing religions but also minority sects, as we saw in the drastic increase in anti-Shia online hate speech and blasphemy accusations that coincided with the anti-Shia rallies around Muharram 2020. In a way, the public nature of expression on the internet has made individual expressions of belief even more vulnerable to attack.

Considering that blasphemy accusations in Pakistan are akin to public incitements to murder, the state has done very little to protect vulnerable citizens. In fact, with widespread campaigns to crack down on blasphemy online, such as the public service announcement texts that the government sends all citizens

encouraging them to report online blasphemy, the state has actively encouraged and given legitimacy to online witch hunts against perceived affronts to religion. This attitude is institutionalized in PECA and the FIA which includes online blasphemy in its jurisdiction. It is difficult to speak about what the state should be doing ideally to confront a problem that the state is actively creating. By encouraging citizens to hunt for blasphemy online, the state is allowing an ever expansive definition of blasphemy with no regard for the law and its own requirements (for example of ill intent).

Short of reforming the blasphemy laws, at the current moment the state should at the very least be taking measures to combat the personal misuse and political weaponization of blasphemy. This should include limiting the content that comes under the definition of blasphemy and limiting the number of avenues through which blasphemy accusations can be made, along with strict action against unproven/false accusations.

OVERALL INCREASE

The year saw an increase in allegations of blasphemy in online spaces as well as multiple social media campaigns that targeted individuals with charges of blasphemy.

A report released by the Centre for Social Justice (CSJ) noted the trend had changed from Muslim complainants accusing non-Muslims of committing blasphemy to Muslims raising allegations against Muslims, though it was clear that no minority sect or religious identity was immune. The CSJ data showed the abuse of blasphemy laws had increased

exponentially in Pakistan. From 1987 to December 2020, at least 1,855 persons were accused of offences related to religion, mostly under sections 295B to 298C of the Pakistan Penal Code, collectively known as the blasphemy laws.⁵⁶

The highest number of accused (200) was reported in the year 2020. Of these, 75% were Muslims, of whom 70% were Shias. The others were Ahmadi 20%, Christian 3.5%, Hindu 1% and the religion of 5% was not confirmed. At least 78 persons had been killed extra-judicially following blasphemy and apostasy allegations.

The sharp increase in blasphemy cases registered against Shias was accompanied by multiple online and offline campaigns against the community. Minority Rights Group International (MRG) and the Al Khoei Foundation expressed concern that anti-Shia organisations were operating with impunity.⁵⁷

200

Is the number of people accused of blasphemy in Pakistan across 2020. The highest annual total in the country's history.
Source: Centre for Social Justice

ACCUSATIONS AND CAMPAIGNS

In the case of Assistant Professor Sajid Soomro, social media proved to be a double-edged sword. Soomro, who taught at Shah Abdul Latif University, Khairpur, was arrested on blasphemy charges but prior to arrest, he posted a video sharing details of why he was being targeted,⁵⁸ and used Facebook Live to call for help.⁵⁹

After the arrest however, vicious social

media campaigns were launched, specifically against Sindh University Teachers' Association president Professor Dr Arfana Mallah who faced threats for speaking against Soomro's arrest and calling for an end to misuse of the blasphemy laws. For her activism, members of a religious party also threatened to lodge an FIR against her on the same grounds as those against Soomro.⁶⁰

According to Voice of America, the police refused to file a complaint against Dr Mallah, however, the social media campaign calling for her to be killed continued.⁶¹ The hashtag #ArrestArfanaMallah295C trended on Twitter and many social media users reportedly called for her to be killed.⁶²

⁵⁶ Our Correspondent. (2020, February 3). 2020 sees a change: CSJ; 75 accused in blasphemy cases Muslims. The News. <https://www.thenews.com.pk/print/784379-2020-sees-a-change-csj-75-accused-in-blasphemy-cases-muslims>

⁵⁷ Minority Rights Group International. (2020, October 20). Shi'a become latest target of Pakistan's extremist Islamic factions; murders, hate speech and numerous blasphemy allegation sow seeds of long-term religious tension - Minority Rights Group. Minority Rights Group International. <https://minorityrights.org/2020/10/20/shia-statement/>

⁵⁸ Academic Freedom Monitoring Project. (2020, June 10). Shah Abdul Latif University: Scholars at Risk. Scholars at Risk Network. <https://www.scholarsatrisk.org/report/2020-06-10-shah-abdul-latif-university/>

⁵⁹ Chaudhry, K. (2020, June 12). Pakistani academics battle blasphemy law. La Croix International. <https://international.la-croix.com/news/world/pakistani-academics-battle-blasphemy-law/12546>

⁶⁰ Khan, A. A. (2020, June 24). Professor could face death penalty for 'blasphemy'. University World News. <https://www.universityworldnews.com/post.php?story=202006241345317626>

⁶¹ Humanists International. (2020, June 17). Second professor faces accusations of 'blasphemy'. Humanists International. <https://humanists.international/2020/06/second-professor-faces-accusations-of-blasphemy/>

⁶² Academic Freedom Monitoring Project. (2020, June 10). University of Sindh: Scholars at Risk. Scholars at Risk International. <https://www.scholarsatrisk.org/report/2020-06-10-university-of-sindh/>

PAKISTAN TRENDS

1. #ArrestArfanaMallah295C

12.4K Tweets

2. #CowardIndianArmy

58.9K Tweets

3. پاکستان کا کپتان عمران خان

11.5K Tweets

In August, Marvi Sirmed, a journalist, activist and political commentator, posted a satirical tweet from her personal account⁶³ related to enforced disappearances of human rights defenders and government critics in Balochistan. Since then, she has faced a series of online campaigns against her that include threats to kill and rape, deploring the agnostic nature of her comment and demanding her arrest for “blasphemy”. Several individuals lodged complaints with the FIA in this regard in different parts of the country including Lahore, Karachi, Jhang and Islamabad.⁶⁴ Singer Bilal Saeed and actor Saba Qamar faced similar online campaigns for a music video of the former's song Qubool that was shot at Wazir Khan Mosque in Lahore. The video was deemed to have hurt religious sentiments, and along with a petition against the two celebrities, social media was awash with criticism

of the video. Saeed subsequently apologised to the public in a video posted on social media.⁶⁵

In the same month, Sohail Masih, a member of the Christian community, was arrested and charged with committing blasphemy for allegedly posting a blasphemous comment on Facebook during Eid celebrations. Masih was arrested after an FIR was registered against him by the leader of a mosque after being shown the comment. Masih is still awaiting trial.⁶⁶ Facebook comments also led to students at Kohat University of Science and Technology attempting to lynch a fellow student for allegedly posting blasphemous comments on the platform. Following violent protests, the university expelled the student and the suspect was later arrested.⁶⁷

Another Christian man, identified as David, was arrested in Nowshera for blasphemy after he was accused of desecrating the Holy Quran. The arrest came a few days after a video went viral on social media platforms showing pages of the Quran in a drain in Risalpur. Acting on complaints, police

launched an investigation and arrested David, who allegedly confessed that he tore pages out to practice witchcraft.⁶⁸

In September, a Lahore sessions sentenced a Christian man to death after convicting him of sending text messages containing “blasphemous content”. The suspect had allegations leveled against him by his factory supervisor, resulting in his arrest and incarceration since 2013. The court order said the man would serve a three-year prison term for “misusing” his mobile phone following which, “he shall be hanged by his neck till his death.” He was also fined Rs50,000.⁶⁹

Perhaps the most high profile act occurred near the end of the year, when an elderly man accused of blasphemy and arrested in 2018 was gunned down during a hearing of the case against him. The assailant, a young man, appeared in a video on social media deeming the elderly gentleman who was also a member of the persecuted Ahmadiyya community, a blasphemer.⁷⁰ Following the murder, the assailant was lauded for the deed by scores of people both online and

⁶³ Sirmed, M. (2020, August 22). Twitter. <https://twitter.com/marvisirmed/status/1297172475499995137>

⁶⁴ International Federation for Human Rights. (2020, August 28). Pakistan: Online threats against Ms. Marvi Sirmed over 'blasphemy' accusations. International Federation for Human Rights. <https://www.fidh.org/en/issues/human-rights-defenders/pakistan-online-threats-against-ms-marvi-sirmed-over-blasphemy>

⁶⁵ Entertainment Desk. (2020, August 14). FIR registered against Bilal Saeed and Saba Qamar. The Express Tribune. <https://tribune.com.pk/story/2259499/fir-registered-against-bilal-saeed-and-saba-qamar>

⁶⁶ United States Commission on International Religious Freedom. (2020, August 5). Sohail Masih: USCIRF. United States Commission on International Religious Freedom. <https://www.us-cirf.gov/sohail-masih>

⁶⁷ A correspondent. (2020, November 5). Kohat university student thrashed over 'blasphemous' remarks. Dawn. <https://www.dawn.com/news/1588671>

⁶⁸ UCA News Reporter. (2020, September 1). Another Pakistani Christian accused of blasphemy - UCA News. Union of Catholic Asian News. <https://www.ucanews.com/news/another-pakistani-christian-accused-of-blasphemy/89351#>

⁶⁹ AFP, Reuters, & Dawn.com. (2020, September 8). Lahore court sentences Christian man to death over blasphemous texts. Dawn. <https://www.dawn.com/news/1578596>

⁷⁰ Human Rights Watch. (2020, November 26). Pakistan: Surge in Targeted Killings of Ahmadis. Human Rights Watch. <https://www.hrw.org/news/2020/11/26/pakistan-surge-targeted-killings-ahmadis>

⁷¹ Farooq, U., & Ahmad, J. (2020, August 10). 'Holy warrior' selfies: Pakistan teen feted for killing U.S. blasphemy suspect. Reuters. <https://www.reuters.com/article/us-pakistan-blasphemy-court-idUSKCN255105>

PUSH TO EXPAND BLASPHEMY LAWS

In a development that may have far reaching consequences in the coming years, lawmakers in Pakistan pledged commitment to the building of, “A Saudi Arabia-like central filtration and screening system,” to tackle online blasphemous content. The Punjab Assembly unanimously passed a resolution asking the federal government to make new or improve existing laws to punish blasphemers and set up a system capable of intercepting blasphemous material on social media.⁷²

The resolution demanded that the authorities must ban and confiscate books containing blasphemous material. It also stressed that the Prevention of Electronic Crimes Act 2016 and Pakistan Penal Code sections related to blasphemy must be revised to introduce stricter sentences. Shortly after, the National Assembly adopted a resolution to condemn all blasphemous content.⁷³

“Certain blasphemers are uploading blasphemous material on social media platforms in the name of freedom of speech and they must be dealt with iron hands under the law”

Punjab Assembly resolution

⁷² Hanif, I. (2020, January 1). Punjab Assembly resolution seeks most stringent anti-blasphemy laws. Dawn. <https://www.dawn.com/news/1525516/punjab-assembly-resolution-seeks-most-stringent-anti-blasphemy-laws>

⁷³ Gillani, W. (2020, January 26). Out of fear: NA, PA resolutions to make blasphemy laws stricter raise questions. The News. <https://www.thenews.com.pk/tns/detail/604012-out-of-fear>

CHILD PORNOGRAPHY

ANALYSIS/OPINION

Manizeh Bano

EXECUTIVE DIRECTOR, SAHIL

Child pornography has always been a major issue even though it only caught the headlines a few years ago. The magnitude of the problem is very large, but unfortunately it is not easy for these cases to surface. It is a very lucrative business and involves well-established mafias. Consequently, it is extremely difficult to break these strong networks.

It is an inevitability that child pornography creation and consumption in Pakistan has increased due to greater access to the internet. In Cruel Numbers data, Sahil has recorded 70 cases of pornography in 2019 and 89 cases in 2020.

On the one hand, laws are clearly defined in the Pakistan Penal Code under sections 292 A, B and C, and these laws are essential to taking action. On the other, cases still have to be reported for any action to be taken against the culprits. There is no easy mechanism for tracing these cases, and while the Federal Investigation Agency (FIA) is responsible for dealing with them, the agency can only respond after a case is actually reported.

Perhaps the most effective intervention would be raising awareness on the ways in which these mafias work to entrap children.

CRUEL NUMBERS

In 2019, Federal Minister for Human Rights Shireen Mazari stated in a National Assembly session that Pakistan ranked among countries with the largest viewership of child pornographic material.⁷⁴ Since then, not only has access to child pornographic material through the 'dark web' reportedly risen, according to an interview of Federal Investigation Agency's Cybercrime Wing Director General Captain (r) Mohammad Shoaib, child pornography is becoming a business in the country. These illegal activities are connected to international criminal agencies that operate global child pornography rackets. Shoaib added that arrests have been made on this front, but multiple cases have seen suspects released on bail.⁷⁵

Based on reports, it is clear that in Pakistan the problem not only extends to sale and purchase of such content, but the production of it as well. The majority are reported to be videos shot coercively by individuals or through hidden cameras for blackmailing or to settle personal scores.⁷⁶

1,489

CASES OF CHILD ABUSE WERE
REPORTED BY NGO SAHIL BETWEEN
JAN-JUNE 2020

The crisis seen online is a reflection of the wider issue of child sexual abuse. The number of such cases reported in Pakistan everyday shot up by 14% in the first half of 2020 when compared to the same period in 2019, child protection NGO Sahil noted in

its latest report, 'Sahil's Six Months Cruel Numbers Report'. The report shared that:

- 1,489 cases of child abuse were reported between January and June 2020.
- More than eight children were abused every day in this period.
- The top five categories of reported cases were abduction (331), sodomy (233), missing children (168), rape (160), attempted rape (134).
- There were 38 cases of murder following sexual abuse. Of total cases, 53% of the victims were girls and 47% were boys.

In a news report, Sahil Senior Programme Officer Waqas Hameed shared that the data was collected from news published in 84 local newspapers so the actual number of cases could be much higher because not every incident is reported in the news.⁷⁷

The government response to the issue suggests some recognition of the seriousness of the problem. This year, Prime Minister Imran Khan said rapists should be handed down the most severe punishments, including hanging them publicly or chemically castrating them.⁷⁸ This call for public hangings of sex offenders had also been echoed in the National Assembly where a resolution was passed with a majority of votes.⁷⁹

Separately, a special committee of the Khyber

⁷⁴ Shaheen, A. (n.d.). Mazari says Pakistan No 1 in child pornography, urges dialogue about child abuse. Geo News. <https://www.geo.tv/latest/242212-mazari-says-pakistan-no-1-in-child-pornography-urges-dialogue-about-child-abuse>

⁷⁵ Wahab, A. (2020, February 18). Child pornography is slowly becoming a business in Pakistan, says FIA official. TechJuice. <https://www.techjuice.pk/child-pornography-is-slowly-becoming-a-business-in-pakistan-says-fia-official/>

⁷⁶ Ahmed, E. (2020, October 18). Society: A dark and ugly world. Dawn. <https://www.dawn.com/news/1585633>

⁷⁷ Junaidi, I. (2020, August 26). Child sexual abuse cases increased by 14pc in first half of 2020: Sahil. Dawn. <https://www.dawn.com/news/1576416>

⁷⁸ Jamal, S. (2020, September 16). Gulf News. <https://gulfnews.com/world/asia/pakistan/prime-minister-imran-khan-calls-for-rapists-to-be-hanged-or-chemically-castrated-pakistan-cabinet-agrees-1.73902343>

⁷⁹ Hussain, J. (2020, February 7). NA passes contentious resolution calling for public hanging of child sexual abusers. Dawn. <https://www.dawn.com/news/1533010>

Pakhtunkhwa Assembly proposed doubling the imprisonment term for child sexual abuse and pornography from seven years to 14 years.⁸⁰

Perhaps most importantly, the National Assembly passed the Zainab Alert, Response and Recovery Bill, 2019 with a majority vote. The bill, which is named after nine-year-old Zainab Ansari, who was murdered after being raped in Kasur in 2018, brings a number of changes regarding official response to missing, abducted, abused or kidnapped children. It includes requirements for completion of all such investigations within three

months; new systems for alerts, responses, recoveries, investigations, trails and rehabilitation; cohesive working of agencies and institutions established for the protection of children including the new Zainab Alert, Response and Recovery Agency (ZARRA) and more.⁸¹

While multiple laws are now in place for dealing with child-related offences, a combination of a weak justice system, poor investigative abilities clubbed with lack of political will, lack of awareness and societal taboos has resulted in the situation seen today, both online and offline.

STEMMING THE TIDE: ARRESTS AND COURT CASES

MAY

The Lahore High Court suspended the sentence of a man convicted for being part of an international nexus of child pornographers and released him on bail. The suspect, Saadat Amin, had earlier been awarded seven-years imprisonment under section 22 of Prevention of Electronic Crime Act (PECA) 2016 and also imposed a fine of Rs1.2 million. The Federal Investigation Agency's cybercrime cell had arrested the suspect on the complaint of the Norwegian embassy in 2017. The prosecution had said the convict was an active member of a racket operating online that used children aged 10-12 years. It said more than 650,000 pictures and videos related to child pornography were recovered from the convict's possession.⁸²

The attorney general of Pakistan's (AGP) office had said the government would challenge the release.⁸³ It was shared that Amin worked with child pornographers Jan Lindstrom in Sweden, Giovanni Betotti in Italy, Max Hunter in the US, and Andrew Moody and Mukhtar in the UK.⁸⁴

JULY

1. The Dera Rahim police arrested six people for assaulting young boys and girls and keeping child pornography on a laptop in village 142/9-L. The police reportedly found several sexually explicit images involving children on the laptop. A resident of the village had alerted the police about the gang after his own son was assaulted by them. The gang would lure boys and girls, studying at a tuition centre, to a drawing room where they would shoot their footage.⁸⁵

⁸⁰ Bureau report. (2020, February 20). PA panel proposes 14 years jail for child abuse, pornography. Dawn. <https://www.dawn.com/news/1535523>

⁸¹ APP. (2020, March 11). National Assembly passes 'Zainab Alert Bill'. The Nation. <https://nation.com.pk/11-Mar-2020/national-assembly-passes-zainab-alert-bill>

⁸² The newspaper's staff reporter. (2020, May 15). Child pornography racketeer released on bail. Dawn. <https://www.dawn.com/news/1557160>

⁸³ Malik, H. (2020, May 16). Govt to challenge release of child porn convict. The Express Tribune. <https://tribune.com.pk/story/2222819/1-govt-challenge-release-child-porn-convict>

⁸⁴ Sheikh, W. A. (2020, May 17). LHC to rehear child pornographer's plea against conviction. Dawn. <https://www.dawn.com/news/1557697>

⁸⁵ The newspaper's correspondent. (2020, January 2). Six held for child sexual abuse, pornography. Dawn. <https://www.dawn.com/news/1525789/six-held-for-child-sexu->

2. A child sexual abuse case came to light in Sindh's Khairpur district after a photo showing a school teacher allegedly sodomizing a minor boy went viral on social media. The teacher was found to be involved in committing sodomy with minor students whom he tutored at a private property, officials and activists said. As reported, those who made the sexual abuse videos go viral were members of the suspect's gang as well.⁸⁶

3. The FIA Cybercrime Wing arrested three suspected child pornographers in a countrywide crackdown. The suspects, who were allegedly members of pornographic websites, had been arrested with the support of Interpol and European and international law enforcement agencies. The suspects were arrested from Lahore, Faisalabad and Gujranwala in Punjab. The agency recovered pornographic material, photographs and other devices from their possession.⁸⁷

4. The FIA Cybercrime Wing continued a cross-country crackdown and arrested four suspects on charges of working for an international child pornography ring. Interpol had reportedly shared relevant information regarding the suspects, following which the law enforcement agency had moved to make the arrests. The ring was allegedly being operated from the United States. According to the FIA, the ring sold pornographic material featuring minors. Officials confiscated 225GB of data from one suspect alone.⁸⁸

SEPTEMBER

Four members of an illegal pornography ring involved in raping, blackmailing, and the filming of sexual abuse of minors were arrested in Karachi. Two members of the same criminal organization were also held following raids. All six members were reported to be involved in raping, sodomising, filming sexual abuse of minors, creating and distributing pornographic videos, and blackmailing the victims by using clips of their sexual assaults. According to the FIA Cybercrime Wing, the porn ring had developed their own mobile app and websites to disseminate the content.⁸⁹

NOVEMBER

A local court of Rawalpindi convicted and handed a death sentence to a child rapist for abusing and uploading pornographic videos of 30 children on the dark web. He was also awarded life imprisonment thrice. The court also imposed a fine of Rs600,000 on the convict. A co-accused was given seven years imprisonment and a fine of Rs100,000.⁹⁰

DECEMBER

The FIA Cybercrime Wing arrested a man in Islamabad for obtaining and sharing child pornography on social media. As reported, the accused, "illegally and unauthorisedly created, administered and operated" groups on Facebook and WhatsApp for the "sole purpose of obtaining, sharing, consuming, possessing and disseminating pornographic and sexually explicit videos/pictures of minors".⁹¹

⁸⁶ Khan, M. H. (2020, July 17). Khairpur teacher arrested for allegedly raping, filming dozens of minor students. Dawn. <https://www.dawn.com/news/1569542/khairpur-teacher-arrested-for-allegedly-raping-filming-dozens-of-minor-students>

⁸⁷ Asad, M. (2020, July 4). Three held for child pornography in countrywide crackdown. Dawn. <https://www.dawn.com/news/1566863/three-held-for-child-pornography-in-countrywide-crackdown-al-abuse-pornography>

⁸⁸ Web Desk. (2020, July 4). FIA arrests four suspects allegedly involved in child pornography. The News. <https://www.thenews.com.pk/latest/681990-fia-arrests-four-suspects-allegedly-involved-in-child-pornography>

⁸⁹ News Desk. (2020, September 23). Four arrested for peddling porn as FIA comes down hard on sex-related crimes. Global Village Space. <https://www.globalvillagespace.com/porn-ring/>

⁹⁰ The newspaper's staff reporter. (2020, November 19). Rawalpindi court sentences child rapist to death on 3 counts. Dawn. <https://www.dawn.com/news/1591104>

⁹¹ Qarar, S. (2020, December 29). FIA arrests man accused of obtaining, distributing child pornography on social media. Dawn. <https://www.dawn.com/news/1598523/fia-arrests-man-accused-of-obtaining-distributing-child-pornography-on-social-media>

ANALYSIS / OPINION

Ramsha Jahangir

JOURNALIST

In the past few years with internet users on the rise, cyber harassment has been more pronounced in Pakistan. This has become an increasing issue as government authorities, as well as social media platforms, have collectively failed to address gendered abuse in Pakistan.

It is easier to target and silence women in this country due to cultural appropriation. In the online space, harassment is often amplified with coordinated attacks. There is no accountability for smear campaigns that are often accompanied by doctored images, bullying and even death threats. This is why the digital environment has become less conducive for women journalists and activists. There is no accountability whatsoever.

In 2020, several women journalists called out abuse and harassment meted out by political parties and their supporters online. To date, nothing has been done to address the issue. Despite the enactment of PECA to 'protect women and minorities', data on the prosecution of cyber harassment shows that the crime is not a priority. Together, these factors have allowed cyber harassment to prevail.

The term 'harassment' itself has been politicized recently. In the online space, personal attacks have become the norm and a common tactic to intimidate critical voices. However, public discourse on harassment in Pakistan often does not address personal attacks as a form of abuse. This is why the political circle needs to invest in a code of conduct to engage online. The solution is to have more conversations around digital politics and the ethics of civil discourse without involving personal attacks.

THE SPREAD OF CYBERCRIME

Cybercrime was estimated to cost the global economy more than \$1 trillion in 2020, up by more than 50% since 2018, according to a report by McAfee Corp. This cost of online criminal activity would form more than 1% of total global economic output, and come in the form of ransomware attacks, phishing, business email takeovers, spyware and cryptocurrency theft. It was noted that the year saw weaker security overall, as more people started working remotely outside of their workplace.⁹²

The same holds true for Pakistan, where over the last few years, and particularly due to pandemic-related lockdowns, a surge in internet traffic has led to a drastic increase in cybercrimes, varying from phishing attacks to harassment and digital identity theft and a myriad of other criminal activities carried out over the internet through computers and mobile phones.⁹³



In a news report, officers of the Federal Investigation Agency (FIA) Cybercrime Wing said that the year had been a challenging one due to an unprecedented hike in cybercrime reporting. In fact,

the reporting trend increased almost five times as compared to the previous year, but so had the disposal of the complaints. The total number of complaints lodged with the Cybercrime Wing during 2020 were 94,227 mainly related to financial fraud, harassment, stalking and unauthorised access. The wing's field operations were also intensified, with 621 accused, 22 gangs arrested and 20,000 electronic gadgets recovered in investigations.⁹⁴

The dire situation was also highlighted in the State of Digital Rights in Pakistan Report 2020 issued by Freedom Network, an advocacy and research group. Key takeaways were that online space for dissent and freedom of expression had shrunk while a rise in censorship, hate speech, digital surveillance and breach of privacy and disinformation and misinformation online had been witnessed during 2020.⁹⁵

In particular, hate speech against religious minorities had spread wider; online news media platforms reported facing hate speech, hostility and organized targeting for their content from various actors including individuals, political parties, religious groups, unknown organized groups and official sources; violence against women was also said to be spreading online, with threats of the violence enabled through digital devices. Data indicated a significant majority of women journalists faced online violence that impacted their personal and professional lives.

⁹² AFP. (2020, December 8). Cybercrime costs to top \$1tr this year... researchers. Dawn. <https://www.dawn.com/news/1594564/cybercrime-costs-to-top-1tr-this-year-researchers>

⁹³ Digital Policy Team. (2020, September 15). Cybercrime on the Rise as More Pakistanis Go Online. Digital Pakistan. <https://digitalpakistan.pk/blog/cyber-crime-on-the-rise-as-more-pakistanis-go-online/>

⁹⁴ Anjum, S. (2021, January 12). Cybercrime wing disposed of 100,000 complaints in 2020. The News. <https://www.thenews.com.pk/print/772823-cybercrime-wing-disposed-of-100-000-complaints-in-2020>

⁹⁵ Mukhtar, I. (2020, October 29). Pakistan witnesses rise in cyber, online crimes. The Nation. <https://nation.com.pk/29-Oct-2020/pakistan-witnesses-rise-in-cyber-online-crimes>

FINANCIAL CYBERCRIME

A few cases of major finance-related cons were reported across the year, resulting in a number of arrests. The FIA Cybercrime Wing was successful in busting six gangs of Nigerian conmen who, with the assistance of local accomplices, were tricking citizens and particularly villagers into sending them money in exchange for promises of millions of dollars in return. About 20 members of the gangs, including the local suspects, were rounded up, and first information reports were registered against them.⁹⁶

Separately, 16 suspects were arrested for being involved in extorting billions of rupees from people across the country using online means. The suspects would pose as representatives of a popular TV show which offered high-priced gifts to participants, or introduce themselves as officers of the Pakistan Army or State Bank of Pakistan as a means to pressure people to share bank details and extort large sums of money in the name of processing fees. A total of seven cases were registered against the suspects.⁹⁷

15-20

DAILY COMPLAINTS RECEIVED BY FIA CYBERCRIME WING REGARDING ONLINE FINANCIAL FRAUD.

At one point in the year, the FIA Cybercrime Wing stated it was receiving 15-20 complaints daily from people robbed of millions of rupees. Sophisticated cons used 'call masking' whereby the name of the FBR, SBP, a bank or other institution would appear on the mobile phone screen of the call recipient, giving their claims and demands legitimacy. The conmen would also have information about the bank branch, account and transactions, date of birth and educational qualification of the targets. As a result, even educated people shared their bank information and suffered losses. According to FIA officials, the fraudsters had thousands of SIMs of various mobile phone companies from fake biometric verification machines and stolen identity card data. Other scams would include false offers of online banking services, ATM cards, lucky draw schemes, income support programmes and prizes.⁹⁸ (Read more in section: Data protection & Privacy).

⁹⁶ Asad, M. (2020, April 26). FIA busts six gangs of cyber conmen. Dawn. <https://www.dawn.com/news/1552320>

⁹⁷ The Newspaper's Staff Reporter. (2020, June 14). 16-member cybercrime gang busted in countrywide sweep. Dawn. <https://www.dawn.com/news/1563299>

⁹⁸ Fareedi, T. (2020, October 22). Online fraud complaints on the rise. The Express Tribune. <https://tribune.com.pk/story/2269390/online-fraud-complaints-on-the-rise>

WOMEN UNDER ATTACK

Reported cases of cyber harassment, and specifically those targeting women, doubled in 2020. The FIA Cybercrime Wing shared that social media groups, including WhatsApp groups, were full of "leaked" pictures and videos of women including housewives, celebrities, political leaders, online influencers and others. Additionally, fake/doctored pictures and video clips of women were also common on social media. These pictures and videos would be used for blackmailing and extortion by criminals.⁹⁹

This threat was also highlighted by Digital Rights Foundation (DRF), whose Cyber Harassment Helpline reported an increase of 189% in complaints during the first lockdown enforced in response to the coronavirus outbreak. Around 74% of the cases in March and April were reported by women, 19% by men, and 5% by gender non-binary persons.¹⁰⁰

On its part, Facebook management expressed commitment to work in liaison with the FIA to combat cybercrime and offered to conduct capacity-building training of officers.

A management team from Facebook visited the office of FIA to discuss cooperation on curbing cybercrime, particularly to protect women and children. The FIA shared that the agency would nominate focal persons of its cybercrime wing in each province to liaise with Facebook on such cases.¹⁰¹

Harassment campaigns were also a feature of 2020, with women being frequent targets.

The frequency of such attacks led to a group of prominent women journalists to jointly condemn a, "well-defined and coordinated campaign" of online harassment against colleagues, including threats of violence. Their message highlighted that their complaints about online crimes were ignored, and worse, defamation provisions in the Prevention of Electronic Crimes Act (PECA) were instead misused to harass women. "The target of these attacks are women with differing viewpoints and those whose reports have been critical of the Pakistan Tehreek-i-Insaf government, and more specifically its handling of the coronavirus pandemic," their statement read, adding that to further "discredit, frighten and intimidate" women journalists, they were referred to as peddlers of "fake news" or "enemy of the people," and accused of taking bribes. The attacks have also been of a sexual nature, involving abuse and smear campaigns.¹⁰² (Read more in section: Disinformation).



Shireen Mazari 
@ShireenMazari1



Disturbing to learn of women journalists being targeted and abused. Abusing women bec they are critical is never acceptable. Journalists do their job & to target them, especially gender-based abusive attacks on women journos, is absolutely unacceptable and disgusting.

5:36 PM · Aug 12, 2020



 792  373  Share this Tweet

⁹⁹ Butt, S. (2020, December 3). Cyber harassment cases double in a year. The Express Tribune. <https://tribune.com.pk/story/2274414/cyber-harassment-cases-double-in-a-year>

¹⁰⁰ Imran, M. (2020, June 4). 189% increase in cyber crime reported during pandemic lockdown. The News. <https://www.thenews.com.pk/print/667565-189-increase-in-cyber-crime-reported-during-pandemic-lockdown>

¹⁰¹ Khan, I. A. (2020, March 3). Facebook to work with FIA to curb cybercrime against children, women. Dawn. <https://www.dawn.com/news/1537974>

¹⁰² Bukhari, A. (2020, October 21). Silent Battles_ How Pakistani Women Counter Harassment in Cyberspace. The Diplomat. <https://thedi diplomat.com/2020/10/silent-battles-how-pakistani-women-counter-harassment-in-cyberspace/>

Such campaigns prompted the Senate Standing Committee on Information Technology to criticize the performance of the FIA and PTA in controlling abuse on social media. The committee members shared that even members of parliament were facing cybercrime issues related to fake social media accounts. The Senate committee members said those behind cybercrime should be exposed and strict action taken against them”.¹⁰³

One of the only prominent cases of swift action being taken by the FIA with regards to online campaigns was taken against women. Across the year, the case of Meesha Shafi and several other women was investigated and heard in connection with allegedly running a social media smear campaign against singer and actor Ali Zafar, whom Meesha had accused of sexual harassment in a Twitter post.¹⁰⁴ At year-end, the case had not reached a verdict.

STEERING CLEAR OF GLOBAL FORUM ON CYBERCRIME

A case regarding the availability of hate material on social media against the judiciary led to interesting revelations on why Pakistan had not signed the Budapest Convention on cybercrime. In a sought-after response, The Ministry of Interior shared that the country had opted not to sign due to reservations shown by intelligence agencies.¹⁰⁵ The reasons cited included:

- Israel was a signatory to the convention and Pakistan did not recognise Israel as a state.
- India was seriously thinking of signing the Budapest Convention.
- The Budapest Convention was highly intrusive and would compromise sensitive data.
- The same had been pointed out by many countries outside Europe, including China, Russia, Indonesia, Malaysia and Singapore.

¹⁰³ The Newspaper's Staff Reporter. (2020, March 5). FIA probed only 32 of 56,000 online abuse cases, senators told. Dawn. <https://www.dawn.com/news/1538517>

¹⁰⁴ Our Correspondent. (2020, December 24). Meesha Shafi, others summoned in FIA case. The News. <https://www.thenews.com.pk/print/763527-meesha-shafi-oth-ers-summoned-in-fia-case>

¹⁰⁵ The Newspaper's Staff Reporter. (2020, February 1). Why Pakistan is not joining global forum on cybercrime. Dawn. <https://www.dawn.com/news/1531734>

DATA PROTECTION & PRIVACY

ANALYSIS/OPINION

Anum Malkani

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The right to privacy is a basic human right. Citizens should have ownership over the data generated about them and should be able to control who can access and use that data. This right is connected with other human rights including freedom of expression.

New technologies have, however, provided governments with unprecedented surveillance capabilities. In most countries, including Pakistan, the surveillance activities of governments are covert and citizens are unaware of what data is being collected about them.

Digital privacy can be bypassed in the interest of security where there are grounds for suspicion and there is a real threat to national security. In these cases, a legal procedure should be followed – such as obtaining a warrant to access the personal data in question. Mass surveillance and untransparent search and seizure of personal data cannot be justified.

In many cases, the argument of national security that is used to justify surveillance activities is disingenuous as surveillance is often used to identify political dissidents and act against them to protect and reinforce the national narrative.

At the moment, Pakistan needs a data protection bill as digital adoption becomes more widespread. The steps taken by the Ministry of IT and Telecom towards this are commendable but to ensure the final bill is robust and serves the citizens of the country, the consultation process must be transparent and feedback from all quarters should be incorporated.

The two main issues with the current draft of the data protection act are: (i) the bill is a step towards data localization which in itself will not improve data privacy and instead, may worsen data privacy outcomes and (ii) the bill does not enforce restrictions on how government agencies collect and use citizen data.

Introduction

Across 2020, financially and politically motivated actors were actively undermining privacy in Pakistan, with local companies, telcos and state institutions becoming victim to various cyber threats, breaches and attacks, both internally and externally that resulted in exposing citizen data and more.

A host of privacy concerns also came to the forefront as a result of

technology employed to track and combat the coronavirus, a system originally developed by the government to combat terrorism in the country. Digital rights experts warned that the data collected from millions of Pakistanis had not been securely protected, resulting in the details of patients and volunteers being leaked online.¹⁰⁶

To address the threats to data,

preserve 'national security', protect the public's right to privacy and justify the adopted solutions for the pandemic, the government released a controversial personal data protection bill. The government claimed the purpose of the legislation was to govern the collection, processing, use and disclosure of data and to establish and make provisions for offenses relating to violation of the right to data privacy of individuals.¹⁰⁷

DATA BREACHES, HACKS AND CYBER ATTACKS

At the start of the year, cybersecurity services company Rewterz claimed to have discovered a data dump of 115 million Pakistani mobile users' data that had shown up for sale on the dark web. The cybercriminal behind this data breach was demanding 300 Bitcoin (about USD\$2.1 million at the time) for the data.¹⁰⁸

This was followed by another report of an online data dump of 44 million Pakistani mobile subscribers -

possibly one part of the earlier mentioned leak.¹⁰⁹ The data contained both personally-identifiable and telephony-related information of users and local companies including names, addresses, ID card numbers, phone

numbers and more. According to experts, the scale of this breach raised questions about the data security and privacy efforts of telecom companies, who along with National Database & Registration Authority (NADRA), were asked by authorities to investigate further.¹¹⁰

115 million

PAKISTANI MOBILE USERS' DATA WENT ON SALE ON THE DARK WEB IN 2020

¹⁰⁶ Wazir, B. (2020, June 3). Pakistan lacks data protection during the Covid-19 pandemic. Coda. <https://www.codastory.com/authoritarian-tech/pakistan-coronavirus-surveillance>

¹⁰⁷ Dawn.com. (2020, April 11). Govt seeks consultation on data protection bill. Dawn. <https://www.dawn.com/news/1548214>

¹⁰⁸ Techjuice. (2020, April 10). 115 Million Pakistani Mobile Users Data Go on Sale on Dark Web, claims cybersec company. <https://www.techjuice.pk/115-million-pakistani-mobile-users-data-go-on-sale-on-dark-web/>

¹⁰⁹ ZDNet. (2020, May 6). Details of 44m Pakistani mobile users leaked online, part of bigger 115m cache. Zero Day-ZDNet. <https://www.zdnet.com/article/details-of-44m-pakistani-mobile-users-leaked-online-part-of-bigger-115m-cache/>

¹¹⁰ Arab News. (2020, April 13). Pakistan investigates claims of mega mobile users data breach. Arabnews.pk. <https://www.arabnews.pk/node/1657621/pakistan>

In the first week of July, popular bus-sharing service Swvl suffered a major security breach that comprised user data, including names, email addresses and phone numbers of over four million customers, forming more than 50% of the company's user base. Details emerged, claiming that partial credit card information and user passwords were compromised as well.¹¹¹ Swvl said it has regenerated all access keys to its systems and infrastructure, reviewed all access privileges, reviewed all firewalls and access controls, and strengthened [different] areas of its system to increase its security and resistance to attacks.¹¹²

4 million

SWVL CUSTOMERS HAD THEIR DETAILS
LEAK DUE TO A SECURITY BREACH

Bykea also experienced a breach wherein hackers managed to infiltrate and delete an entire database, though the company remained unaffected because the attack was caught early on and the company had data backups. The management also believed that the hacker was trying to mine cryptocurrencies from the computational data on the server.¹¹³

K-Electric, the sole electricity provider for Karachi, experienced a cyber attack that led to the disruption of billing and online services.¹¹⁴ The system could not be recovered and remained hacked for more than four days, as hackers demanded \$38 million from the authorities to return the data. The hackers claimed to have obtained access to user data and other important information.¹¹⁵

The year also saw the growth of WhatsApp groups that facilitated the trade of private data, with reports of fingerprint data being sold for a few hundred rupees. Sensitive data, including name, date of birth, family tree, and fingerprints would be on offer at very low prices. An investigation by the Federal Investigation Agency found that scams ran far deeper, as personal information was used to trap unsuspecting individuals and access call detail records. The data would then mostly be used to register SIM cards from which the scammers made calls under false pretences to dupe people, including pretending to be bank representatives or army officials. The information gathered would then be used to acquire details of bank accounts that would then be drained.¹¹⁶

A new WhatsApp hacking modus operandi was also reported where hackers entered accounts through a single message. According to reports, the target would receive a message from a friendly contact asking them to share a code that the target could get from a variety of sources. Once the malware code was sent from a WhatsApp number, the person perpetrating the hack would get access to the target's account.¹¹⁷

Separately, the National Telecommunication & Information Technology Security Board (NTISB) issued a letter to government officials about hacking of WhatsApp accounts, which a few government officials had allegedly fallen victim to. The hack involved the opening of a 'verification' SMS which would allow access to the user's personal chats. The SMS would ask receivers to click on a link and insert a verification code, and upon doing so, the user would receive a call

¹¹¹ Jahangir, R. (2020, August 1). Bus-sharing service users data hit by security breach. Dawn.com. <https://www.dawn.com/news/1572237/bus-sharing-service-users-data-hit-by-security-breach>

¹¹² Paracha, Z. N. (2020, July 7). Swvl reveals security breach; names, email addresses and phone numbers of customers accessed by unauthorized party. menabytes. <https://www.menabytes.com/swvl-security-breach/>

¹¹³ Hassan, T. (2020, September 2). Hackers delete Bykea database, company unaffected due to backups. Profit Magazine. <https://profit.pakistantoday.com.pk/2020/09/02/hackers-delete-bykea-database-company-unaffected-due-to-backups>

¹¹⁴ Jajja, S. (2020, September 10). K-Electric struck by 'ransomware'. Dawn. <https://www.dawn.com/news/1578882>

¹¹⁵ Dunya News. (2020, September 10). K-Electric's IT system remains hacked on fourth day - Pakistan. Dunya News. <https://dunya.com/en/Pakistan/563244-K-Electric-IT-system-remains-hacked-fourth-day>

¹¹⁶ Jawad, A. (2020, June 23). Pakistan's 'dark web' sells your sensitive personal details for peanuts. Samaa. <https://www.samaa.tv/news/2020/06/pakistan-dark-web-sells-your-sensitive-personal-details-for-peanuts/>

¹¹⁷ Web Desk. (2020, November 6). WhatsApp users in Pakistan beware of new simple hackers' trick. ARY News. <https://arynews.tv/en/whatsapp-hacking-pakistan-message-beware/>

from an international number starting with ‘001’. The call would then transfer the user’s ID and WhatsApp data to the hackers.¹¹⁸

As seen in the past, political tensions between Pakistan and India reflected in the online space as well. Mid-year, the Inter-Services Public Relations (ISPR) reported that intelligence agencies had identified a major cyber attack by Indian intelligence, targeting mobile phones and gadgets of government officials and military personnel.¹¹⁹

Additionally, hacking attempts by Indian hackers against Pakistani websites, including those of the government and financial institutions were also reported.¹²⁰ Among more prominent attacks, the official website of the Civil Aviation Authority (CAA) came under an attack by an Indian hacker duo, however the CAA’s IT team restored the site after a brief interval, with no data loss.¹²¹ On August 5, just after the first Pakistan Vs England Test series started, Indian hackers had hacked the PTV sports official website. The homepage showed the Indian flag with ‘Hindustan Zindabad’ text being displayed.¹²²

“It has been reported that hostile intelligence agencies have developed technical capabilities and means to gain access to sensitive information stored in mobile phones of officials of government departments, institutions, and ministers in the country... These spyware companies are using hacking softwares and applications such as ‘Chat Line’ and ‘Pegasus’ malware on WhatsApp account of target mobile phones (IOS and Android) to gain access to sensitive information”

National Telecom and Information Technology Security Board,
Cabinet Division, Government of Pakistan

DATA PROTECTION BILL 2020

The most wide-impact, state-initiated effort toward data protection came in the form of the Personal Data Protection Bill, 2020, formulated by the Ministry of Information Technology and Telecommunication (MoITT). In the draft of the bill, the purpose of the legislation was to govern the collection, processing, use and disclosure of personal data and to establish and making

provisions about offenses relating to violation of the right to data privacy of individuals by collecting, obtaining or processing of personal data by any means.¹²³ The bill was not passed into law by year-end.

As noted in a report authored by Digital Rights Foundation managers, “Some concerns regarding

¹¹⁸ Naya Daur. (2020, May 13). Govt Officials’ WhatsApp Accounts Being Hacked Mysteriously. Naya Daur. <https://nayadaur.tv/2020/05/govt-officials-whatsapp-accounts-being-hacked-mysteriously/>

¹¹⁹ Web Desk. (2020, August 12). Pakistan Army identifies major cyber attack by India targeting mobile phones of govt, military officials. The News. <https://www.the-news.com.pk/latest/699597-pakistan-army-identifies-major-cyber-attack-by-india-targeting-mobile-phones-of-govt-military-officials>

¹²⁰ News Desk. (2020, August 12). Major cyber attack by Indian intelligence identified: ISPR. The Express Tribune. <https://tribune.com.pk/story/2259193/major-cyber-attack-by-indian-intelligence-identified-ispr>

¹²¹ APP. (2020, November 18). Indian hackers target Pakistani websites. APP. <https://www.app.com.pk/national/caa-website-back-on-line-after-brief-hacker-attack/>

¹²² Hamid, G. (2021, February 24). PTV Sports website hacked by Indians. BOL News. <https://www.bolnews.com/latest/2020/08/ptv-sports-website-hacked-by-indians/>

¹²³ Jahangir, R. (2020, April 11). Govt seeks consultation on data protection bill. Dawn. <https://www.dawn.com/news/1548214>

the proposed legislation include the exception of medical research from the ambit of personal data to be collected with the consent of the data subject where the term medical research has not been defined. Furthermore, Sections 31 and 38 allow for wide exemptions to the federal government to exclude itself from owing responsibility to protect and safely nest the data of its citizens which has been a concern in the past. Additionally, the use of terms ‘vital interests’ and ‘critical personal data’ without providing a definition as to what constitutes these interests could result in arbitrary enforcement of the law.” The report also noted that, “While these concerns are alarming on their own, they are made more urgent due to the novel coronavirus, which has engendered an increase in the use of technology to tackle the pandemic.”¹²⁴

“We cannot forgo privacy rights or ignore the possibility of misuse of health surveillance technology, especially in a country where there is no protection”

Zainab Durrani And Shmyla Khan
Project managers at Digital Rights Foundation

It is to be noted that there were several leaks of private details of both coronavirus patients and medical staff across the year. These leaks came alongside large-scale data gathering by the government as part of initiatives launched to tackle the pandemic. This included the establishment of a new data hub in Islamabad that deployed tracking systems used by intelligence agencies to track cases. The PTA shared that it assisted the

government on this front by using cell tower tracking to locate mobile phones of infected persons and sending them SMS messages. It also included the launch of coronavirus-related mobile apps that used GPS to track and alert registered users.¹²⁵ Finally, the government also set up a volunteer network, the ‘Corona Relief Tiger Force’, that saw a massive data leak - including ID cards and mobile numbers - of thousands of volunteers.¹²⁶

¹²⁴ Durrani, Z., & Khan, S. (2020, May 17). Coronavirus: Pandemic tech and privacy concerns. The News. <https://www.thenews.com.pk/tns/detail/659111-pandemic-tech-and-privacy-concerns>

¹²⁵ Wazir, B. (2020, June 3). Pakistan lacks data protection during the Covid-19 pandemic. Coda. <https://www.codastory.com/authoritarian-tech/pakistan-coronavirus-surveillance/>

¹²⁶ Jahangir, R. (2020, May 4). Personal details of Tiger Force volunteers circulating online. Dawn. <https://www.dawn.com/news/1554359>

CENSORSHIP & MEDIA

ANALYSIS / OPINION

Sadaf Khan

CO-FOUNDER,

MEDIA MATTERS FOR DEMOCRACY

In the last few years the online landscape has become much more regressive than before. We have seen an increase in instances of intimidation through law i.e. the use of PECA to issue notices to journalists and political workers. This is obviously not how the law is supposed to work and gives rise to the suspicion that this is simply a means to intimidate people.

We have also seen an increase in polarisation, hate speech and incitement to violence. Hashtags have been initiated against journalists by Twitter users claiming to be supporters of different political parties, and political leadership from all parties have been guilty of sharing/supporting or simply ignoring these hashtags and accounts. The fact that dozens of women journalists came together to issue two statements against hate speech and coordinated campaigns against them in August and September 2020 is testament to the fact that the situation today is much, much worse than it has ever been before.

The ruling PTI in particular is guilty of giving official (even if volunteer) positions within its social media cells to accounts that actively promote hate and violence against journalists. In my opinion the situation is consistently worsening, mainly because nobody is willing to take responsibility for their actions. The government, and unfortunately the political parties in the opposition, all push for more regulation and more governance as a way of controlling this hate; however, this is a problem of behaviour and ethics, not a problem of the law. The fact is that FIA and other law enforcement bodies are simply not able to implement even the laws that already exist. There is no accountability by political parties against those in their own ranks who perpetuate these hateful trends. There is no discussion on internal code of conduct for social media cells of these parties. There is no discussion

on civic responsibility and ethical behaviour at all.

Accusations of spreading false news are consistently made; apps have been blocked; regressive social media rules introduced and enforced. In specific, the government has introduced the Rules for Removal of Unlawful Online Content, and the outcry raised against it has only been successful in perhaps delaying the inevitable decline it brings. The rules create a legal landscape that is extremely regressive and dangerous for FoE and privacy rights, but it is also a landscape that appears technically impossible to actually implement. As such, this effort appears to be either pressure building or an excuse to eventually shut some platforms down.

To improve the situation, a number of things need to be done:

- Repeal Section 37 of PECA, which is the main law that has been consistently used to target journalists, activists and political workers.
- Hold public bodies accountable for not adhering with the proactive disclosure obligations of the right to information laws. The federal and provincial information commissions have to start getting more active in terms of asking for data and information that should proactively be shared online.
- We need a serious national discourse with all stakeholders regarding how the online space should be regulated. There are international standards and recommendations that have been made by various UN bodies and UNSRs that can provide a good base to initiate a human rights focused discourse.
- The hangup on morality and culture and the bend towards asking for removal and blocking of content that is deemed offensive is creating real harm. The public needs to be educated on how the internet works; they need to believe in their own agency to access content and/or not access it if they do not like it.

MORE CURBS ON SPEECH

The country continued its downward spiral in terms of both access to information and right to freedom of speech online, with ever-growing censorship, regressive policies and a worsening environment for the media across the year.

The annual Freedom on the Net 2020 report scored Pakistan a low 26/100 due to obstacles to access, limits on content and violation of user rights.¹⁶⁰

Terming the environment “Not free”, the report went on to say that local cyberspace, “is tightly controlled by the government. Internet shutdowns, blocked websites, and arrests for activity online remain authorities’ preferred tactics in their effort to suppress unwanted speech. Controversial draft Citizens Protection (Against Online Harm) Rules 2020 were introduced during the coverage period and if passed, would undermine encryption, give

authorities more access to personal data, and enhance the government’s ability to block or remove online content. Government figures showed that 900,000 websites have been blocked, including those hosting political, religious, and social content.”

Pakistan

26/100

A. Obstacles to Access ————— 5/25

B. Limits on Contents ————— 14/35

C. Violations of User Rights ————— 7/40

LAST YEAR’S SCORE & STATUS

26/100

Scores are based on a scale of 0 (least free) to 100 (most free)

SOCIAL MEDIA CENSORSHIP



As highlighted in their Transparency Report, Facebook implemented over 1,000 restrictions for Pakistan on its platforms (Facebook and Instagram) across January-June 2020. These restrictions were put in place on instructions sent by the state regulator, the Pakistan Telecommunication Authority (PTA) for “allegedly violating local laws”. These included:

- 557 items related to blasphemy

- 209 items related to anti-judiciary content

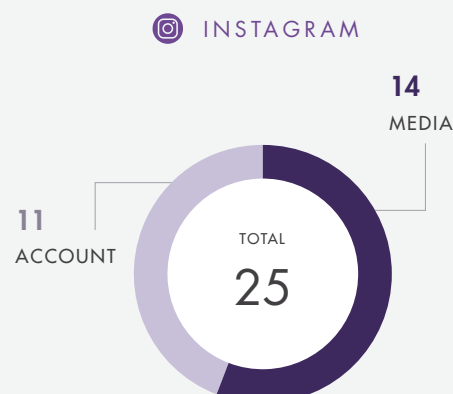
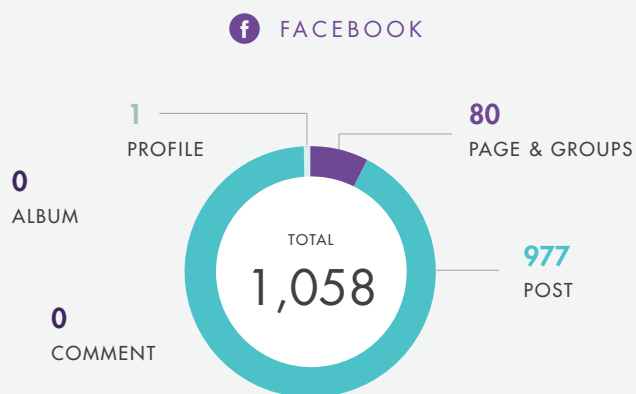
- 180 items related to condemnation of the country's independence

- 66 items related to sectarian enmity

- 71 items for a range of offenses, including obscenity, advocacy against the polio vaccine, and other offenses under the Prevention of Electronic Crimes Act.

The social media giant reported that 22 items were restricted “in error” and these mistakes were corrected.¹²⁷

Specific details of the cases are not known due to a lack of transparency on the parts of Facebook and the state.



Google reported that a total of 154 requests were made by Pakistan to remove content across the January-June 2020 period for a total of 903 items across their platforms.¹²⁸ The majority of these requests were related to YouTube and requested by the state regulator and local police. A total of 336 of the items were removed for legal reasons while another 24 were removed for policy reasons. The top reasons for the requests were:

Religious offence: 65 requests

Defamation: 23 requests

Hate speech: 19 requests

REMOVAL REQUESTS: PAKISTAN

Requests and items upto June 2020



Specific details of the cases are not known due to a lack of transparency on the parts of Google and the state. In total, PTA issued two public notices to YouTube in the year, ordering the platform to block “vulgar, indecent, immoral, nude and hate speech content” in Pakistan.¹²⁹ The platform was also directed to, “Put in place an effective content monitoring and moderation mechanism to expeditiously respond to PTA’s requests for removal of illegal and harmful online content.”¹³⁰

¹²⁷ Facebook. (2020, June). Country Restrictions - PK. Facebook Transparency. <https://transparency.facebook.com/content-restrictions/country/PK>

¹²⁸ Google. (2020, June). Government requests to remove content. Google Transparency Report. https://transparencyreport.google.com/government-removals/-by-country/PK?country_request_amount=group_by:products;period:Y2020H1;authority:PK&lu=country_item_amount&country_item_amount=group_by:reasons;period:;authority:PK

¹²⁹ PTA. (2020, August 27). PTA asks YouTube to block indecent content. PTA. <https://www.pta.gov.pk/en/media-center/single-media/pta-asks-youtube-to-block-indecent-content-280820>

¹³⁰ PTA. (2020, September 2). YouTube asked to have effective content moderation mechanism for Pakistan. PTA. <https://www.pta.gov.pk/en/media-center/single-media/youtube-asked-to-have-effective-content-moderation-mechanism-for-pakistan-030920>



Growing to be one of the largest social media platforms for Pakistan in 2020, TikTok and the state tussled back and forth across the year with regards to censorship of content.

Trouble began in January when the state regulator, Pakistan Telecommunication Authority (PTA), wrote to Tiktok requesting the removal of videos posted on the platform by TikTokers Hareem Shah and Sundal Khattak. The two women had gained notoriety for sharing videos featuring politicians and ministers, which may have been the cause for the complaint. PTA claimed it wanted to, “defuse” the videos and alleged that the authority had received other complaints as well. It was also claimed that TikTok had cooperated with the government in the past and had removed 90% of controversial material.¹³¹

In August, the Pakistan Telecommunication Authority (PTA) asked TikTok to block, “vulgar, indecent and immoral content for viewership in Pakistan”. The Chairman PTA also held an online meeting with senior management of TikTok where the platform was asked to put in place stronger content monitoring and moderation mechanisms against material deemed unlawful in Pakistan.¹³²

In July, a civil miscellaneous application was filed

in the Lahore High Court demanding an immediate ban on the platform. The petitioner dubbed the app a “great mischief of modern times”, claiming it was a source of pornography.¹³³ At the same time, PTA issued a “final warning” to TikTok to moderate content following numerous complaints against, “immoral, obscene and vulgar content on social media applications particularly Tik Tok and Bigo, and their extremely negative effects on the society in general and youth in particular.” The regulator added that the response of these companies had not been satisfactory, resulting in the ban of Bigo for some time.¹³⁴ The tussle culminated in TikTok being banned in Pakistan in October, followed quickly by its re-opening after the PTA received assurances from the company that it would “moderate” content in accordance with local laws.¹³⁵

As a response to complaints about content regulation in Pakistan as well as other Asian countries, TikTok established a regional Safety Advisory Council to advise management on content moderation policies and safety issues specific to Asia Pacific. The body consists of experts in the field of legal and regulatory bodies and academics from across the region. Jehan Ara, President of the Pakistan Software Houses Association for IT was nominated as one of the seven members of the council.¹³⁶

¹³¹ Khan, Z. A. (2020, January 18). PTA asks TikTok to remove Hareem Shah, Sundal Khattak's videos. Samaa. <https://www.samaa.tv/news/2020/01/pta-asks-tiktok-to-remove-hareem-shah-sundal-khattaks-videos/>

¹³² PTA. (2020, August 28). PTA asks TikTok to block vulgar, indecent & immoral content. PTA. <https://www.pta.gov.pk/en/media-center/single-media/p-ta-asks-tik-tok-to-block-vulgar-indicent-immoral-content-290820>

¹³³ Jahangir, R. (2020, July 21). Live streaming app Bigo banned in Pakistan. Dawn. <https://www.dawn.com/news/1570250>

¹³⁴ PTA. (2020, July 20). PTA issues final warning to TikTok and blocks Bigo app. PTA. <https://www.pta.gov.pk/en/media-center/single-media/pta-issues-final-warning-to-tik-tok-and-blocks-bigo-app-210720>

¹³⁵ Al Jazeera. (2020, October 19). Pakistan lifts ban on TikTok after app vows to moderate content. Al Jazeera. <https://www.aljazeera.com/news/2020/10/19/tiktok-ban-in-pakistan-lifted>

A report in CNN pointed to reasons why TikTok was facing bans and such pressure by the government, outside of the morality debate. For one, the government was caught by surprise at the massive growth of the app's usage in the country, particularly among the lower middle class whose voices were not well represented on other platforms. This led to videos being shared that were critical of the state. The report noted that this pressure was part of broader state policy to clamp down on all forms of speech.¹³⁷

Even a ban based on the morality argument was criticized for its negative impact on Pakistan. Mubariz Siddiqui, general counsel at venture capital

fund Sarmayacar shared that, "If TikTok is banned, people might conflate this with, 'Oh well let's make apps for ourselves.' But Tiktok wasn't banned because it was foreign. It was banned because it was immoral. If you make a Pakistani version of an app, you run the risk of it also getting banned because it's immoral. This will only act as a deterrent for entrepreneurs and investors." Shahbaz Jamote, CEO and Co-founder of TelloTalk added to this note of concern, stating that, "The ban was not something to rejoice. Instead, it not only sets a draconian precedent for any social application operating in Pakistan, local or foreign, but also sends a negative signal for any investor already nervous about the market."¹³⁸



Amnesty International South Asia @amnestysasia · Oct 9, 2020

PAKISTAN: In the name of a campaign against vulgarity, people are being denied the right to express themselves online. The [#TikTokBan](#) comes against a backdrop where voices are muted on television, columns vanish from newspapers, websites are blocked and television ads banned.



158



356



660



Amnesty International South Asia @amnestysasia · Oct 9, 2020

We hope this disappointing decision is reversed immediately and efforts are made to loosen the grip over what the people in Pakistan can read, watch, speak, write or do.

¹³⁶ The Newspaper's Staff Reporter. (2020, September 24). TikTok sets up council to allay concerns over content control. Dawn. <https://www.dawn.com/news/1581339/tiktok-sets-up-council-to-allay-concerns-over-content-control>

¹³⁷ Wang, S. (2020, October 13). Pakistan's TikTok ban is about censorship, not China. CNN. <https://edition.cnn.com/2020/10/13/tech/tiktok-pakistan-ban-intl-hnk/index.html>

¹³⁸ Lakhani, K. (2020, October 15). Why Pakistan's TikTok ban is a bad sign for investors. Atlantic Council. <https://www.atlanticcouncil.org/blogs/new-atlanticist/why-pakistan-tiktok-ban-is-a-bad-sign-for-investors/>



Dating apps

In another move to control cyberspace, PTA blocked access to five dating/live streaming apps: Tinder, Tagged, Skout, Grindr and SayHi. A statement by the regulator said, "Keeping in view the negative effects of immoral/indecent content streaming through the above applications, PTA issued notices to the management of above mentioned platforms for the purpose of removing dating services and to moderate live streaming content in accordance with the local laws of Pakistan. Since the platforms did not respond to the notices within the stipulated time therefore the Authority issued orders for blocking of the said applications."¹³⁹

The regulator did leave room to "reconsider blocking" if the companies complied with local

laws "with respect to moderating the indecent/immoral content through meaningful engagement". Tinder responded by stating it would "welcome the opportunity to discuss our product and moderation efforts with the [PTA] and look forward to a meaningful conversation."¹⁴⁰

The Tinder app in particular had gained in popularity, being downloaded more than 440,000 times in Pakistan in the past year.¹⁴¹

"If adults choose to be on an app, it is not for the state to dictate whether they should use it or not"

Shahzad Ahmad, Director of Bytes For All,
on the blocking of dating apps



PUBG

Popular online game PlayerUnknown's Battlegrounds (PUBG) faced a ban in Pakistan, based on complaints the PTA claimed it received. The regulator said the ban was put in place, "On the premise that the said game affects physical and mental health of specially children / young teenagers, addictive, waste of time and promotes violent behavior amongst the players, etc."¹⁴²

This ban resulted in an uproar, and was challenged in the Sindh High Court by TV host Waqar Zaka who

argued that claims the "game is addictive, wastage of time, and poses various negative impacts on the physical and psychological health of the children is completely untrue, based on wrong and faulty reasoning and lack of judgement".¹⁴³ PTA attempted to legitimize the ban by citing section 37 of the Prevention of Electronic Crimes Act, 2016 which allows blocking in, "the interest of the glory of Islam, the integrity, security or defence of Pakistan or...public order, decency or morality". The ban was however lifted shortly thereafter.¹⁴⁴

¹³⁹ PTA. (2020, September 1). PTA blocks five dating/livestreaming applications. PTA. <https://www.pta.gov.pk/en/media-center/single-media/pta-blocks-five-datinglive-streaming-applications-010920>

¹⁴⁰ Hussain, J., & AFP. (2020, September 1). PTA bans five dating apps including Tinder citing 'immoral content'. Dawn. <https://www.dawn.com/news/1577392>

¹⁴¹ Jahangir, R. (2020, October 16). Pakistan's Tinder ban signals coming showdowns with YouTube and Twitter. CODA. <https://www.codastory.com/authoritarian-tech/pakistans-digital-crackdown/>

¹⁴² PTA. (2020, July 23). Decision on PUBG Online Game Under Section 37 of the Prevention of Electronic Crimes Act, 2016. PTA. <https://www.pta.gov.pk/en/media-center/single-media/decision-on-pubg-online-game-under-section-37-of-the-prevention-of-electronic-crimes-act-2016--230720>

¹⁴³ Haque, I. U. (2020, July 1). Waqar Zaka challenges PUBG ban in Karachi court. Samaa. <https://www.samaa.tv/news/pakistan/2020/07/waqar-zaka-challenges-pubg-ban-in-karachi-court/>

¹⁴⁴ Web Desk. (2020, July 30). Pakistan lifts ban on PUBG, Bigo. The News. <https://www.thenews.com.pk/latest/694364-pakistan-to-lift-pubg-ban>



Sites & online content

The state continued its policy of blocking sites, adding to the block list numbering in the hundreds of thousands already noted in previous Internet Landscape reports.

Prominent blocks included that of Slate.com, a news magazine that had in the past been blocked for coverage of the Pashtun Tahafuz Movement (PTM), a movement that demands human rights of the Pashtun community. The block had reportedly been in effect since November 2, 2019, without any notification or statement from the authorities.¹⁴⁵ Gizmodo.com, a technology and science website was also found to be blocked in Pakistan for reasons unknown. When forced to respond to a Right to Information (RTI) request filed by Media Matters for Democracy (MMfD) on the blocking of both sites, the regulator said the blocks were in place “due to a technical fault”. The websites then became accessible in Pakistan.¹⁴⁶

In another significant development, The Islamabad High Court issued notices to the PTA chairman and its members for not framing rules provided in the Prevention of Electronic Crimes Act (PECA) 2016 - a matter the regulator was ordered to do after the court observed that the PTA cannot block any website without framing rules. The court had issued direction for framing and notifying the rules in three months, which the regulator failed to do. The

issuance of notices was the next step in a case involving the blocking of the Awami Workers Party (AWP) website last year - a block that was challenged by the AWP. The court order said the PTA had responded by stating that Section 37 of PECA empowered it to block websites “without notice or affording an opportunity of hearing to the person who could be adversely affected by an order or action of the authority.” IHC Chief Justice Athar Minallah noted that “the PTA is definitely not empowered to pass an order or take action under Section 37 [of PECA] in derogation of the mandatory requirements of due process...This interpretation of Section 37 is in flagrant violation of the fundamental rights guaranteed under the Constitution as well as the settled law enunciated by the superior courts.”¹⁴⁷

In October, local film director Asim Abbasi's acclaimed web-series *Churails* that was hosted on Indian streaming platform Zee5 was blocked for Pakistanis after it went viral for its depiction of strong female leads and challenging subject matter. The PTA effectively banned the show by asking Zee5 to take the series down for Pakistani audiences, a request the platform complied with.¹⁴⁸ A viral video clip from the show featuring veteran actor Hina Khawaja Bayat's character talking about sexual favours she gave for job promotions was reportedly one of the reasons the show was censored.¹⁴⁹

¹⁴⁵ PKamran, H. (2020, January 6). 'A disturbing crackdown on press freedom': Pakistan arbitrarily blocking Slate.com. Global Voices. <https://advox.globalvoices.org/2020/01/06/a-disturbing-crackdown-on-press-freedom-pakistan-arbitrarily-blocking-slate-com/>

¹⁴⁶ Kamran, H. (2020, March 20). PTA responds to RTI requests; unblocks Slate and Gizmodo websites. Digital Rights Monitor. <https://www.digitalrightsmonitor.pk/pta-responds-to-rti-requests-unblocks-slate-and-gizmodo-websites/>

¹⁴⁷ Asad, M. (2020, March 13). PTA issued notice for not framing rules to block websites. Dawn. https://epaper.dawn.com/DetailImage.php?StoryImage=13_03_2020_004_005

¹⁴⁸ Mushtaq, W. (2020, November 2). *Churails*: Why a feminist detective show was banned in Pakistan. BBC News. <https://www.bbc.com/news/world-asia-54629439>

¹⁴⁹ Entertainment Desk. (2020, October 8). Celebs deem 'Churails' ban devastating blow to creative freedom in Pakistan. The Express Tribune. <https://tribune.com.pk/story/2267500/celebs-deem-churails-ban-devastating-blow-to-creative-freedom-in-pakistan>

Following an uproar against the ban, the show was made accessible to Pakistanis once again. Zee5 in a statement said, “Our aim has always been to create content that resonates strongly with viewers across the globe. Churails has been a phenomenal success story for us and has been lauded and loved the world over. The show was taken off the platform in Pakistan purely in compliance with a directive that we received. We

have now addressed the matter and reinstated the show on our platform”.¹⁵⁰

However, in another move to block access to Churails, the State Bank notified all banks to stop online payments for electronic media content from India. The circular mentioned Zee5 by name, which many in entertainment circles reportedly termed a ban in connection to the show.¹⁵¹

VPN REGISTRATION

Over the years, and particularly following the YouTube ban, Pakistani internet users have become increasingly comfortable using Virtual Private Networks (VPNs) to bypass internet censorship by the state. In 2020 however, the government made multiple announcements stating that browsing the web using VPNs would not be allowed without registering the VPN with the authorities first - effectively bringing such circumvention to an end and opening all local VPN users up to state regulation and surveillance.

According to the PTA, the exercise would be undertaken, “To promote legal ICT services/business in Pakistan and safety of telecom users... As per applicable rules and regulations, appropriate registration is required from PTA for any mode of communication in which communication becomes hidden or encrypted.” The regulator claimed it would only take action against those using VoIP and VPNs for terminating illegal traffic, however, as reported in Dawn, digital rights groups said the move was a threat to internet freedom.¹⁵²

The Dawn report also noted that users had reported throttling of VPN services in Pakistan, including inability to access Tor Browser — a software that allows users to browse anonymously. It is however unclear by year-end as to what extent PTA would pursue and enforce this policy.

¹⁵⁰ Images Staff. (2020, October 9). Churails is back up on Zee5 in Pakistan. Images. <https://images.dawn.com/news/1185881/churails-is-back-up-on-zee5-in-pakistan>

¹⁵¹ Iqbal, S. (2020, November 13). SBP bans online payments for Indian content. Dawn. <https://www.dawn.com/news/1590107/sbp-bans-online-payments-for-indian-content>

¹⁵² Jahangir, R. (2020, June 16). PTA asks internet users to register VPNs to avoid ban after June 30. Dawn. <https://www.dawn.com/news/1563843/pta-asks-internet-users-to-register-vpns-to-avoid-ban-after-june-30>

JOURNALISM VS ONLINE CENSORSHIP, THREATS

Pakistan has remained one of the most dangerous countries to practice journalism for years, and the same held true for 2020. As documented by Freedom Network, at least 91 cases, including seven murders of journalists and a blogger, multiple attacks and other violations were seen against the media between May 2019 and April 2020. This was an average of over seven

cases of violations per month.¹⁵³

Unfortunately, the online landscape for freedom of expression for media practitioners followed the same trend, with multiple arrests related to online speech, ongoing harassment campaigns and more being witnessed.

Targeted: Azharul Haq Wahid

Local journalist Azharul Haq Wahid, who has been associated with Channel Five and daily Khabrain newspaper was arrested by the Federal Investigation Agency (FIA) and put in physical remand by the courts on allegations of sharing content that was "anti-state and defamatory material against the public functionaries and state departments" on Facebook. A first information report (FIR) was registered against him under Sections 11 and 20 of the Pakistan Electronic

Crimes Act (PECA) 2016, along with Section 505 of the Pakistan Penal Code. Wahid's lawyer rejected the allegations and said the FIA had arrested him "illegally".¹⁵⁴

The young journalist was later granted bail by the Lahore High Court. His lawyer, Mian Daud stated that, "Criticising the government or Musharraf can't be classified as rebellion". He also argued that a false case was lodged against Wahid to scare journalists.¹⁵⁵

***"Hunting down dissidents and demonizing critics as traitors was always part of the media landscape, but the scale, audacity and scope of it we see now remains unprecedented... Pakistan's media faces deep, structural constraints that translate into crippling censorship."*¹⁵⁶**

Syed Talat Hussain,
Senior Journalist

¹⁵³ Freedom Network. (2020, April 30). Freedom Network Annual Press Freedom Report 2020. Freedom Network. <http://www.fnpr.org/freedom-network-annual-press-freedom-report-2020/>

¹⁵⁴ Bilal, R., & Dawn.com. (2020, January 17). Lahore journalist remanded into FIA custody over 'anti-state' Facebook posts. Dawn. <https://www.dawn.com/news/1528913/lahore-journalist-remanded-into-fia-custody-over-anti-state-facebook-posts>

¹⁵⁵ Web Desk. (2020, March 27). Court grants journalist Azharul Haq bail in 'anti-state' remarks case. Samaa. <https://www.samaa.tv/news/pakistan/2020/03/court-grants-journalist-azharul-haq-bail-in-anti-state-remarks-case/>

¹⁵⁶ Qayyum, K., & Haider, K. (2020, March 4). YouTube Becomes Refuge for Pakistan Journalists Battling Censors. Bloomberg. <https://www.bloomberg.com/news/articles/2020-03-03/youtube-becomes-refuge-for-pakistan-journalists-battling-censors>

Targeted: Matiullah Jan

Prominent Pakistani journalist Matiullah Jan, who had increasingly shifted focus to sharing criticism of the military and other state institutions to Twitter and YouTube, was kidnapped in the capital city Islamabad by at least 10 armed gunmen, only to be released hours later. The brazen act was caught on CCTV

cameras, yet little action followed after the event. In 2018 the military had labelled Jan “anti-state” for his criticism of the judiciary and army. The journalist had been charged with contempt of court for a tweet critical of the judiciary just prior to his kidnapping. He had been ordered to appear in court the following

Targeted: Asad Toor, Bilal Farooqi, Absar Alam

Within the span of one week (September 11-16) three journalists were charged with sedition under PECA - a move that resulted in an outpouring of criticism against the state for its heavy handed approach to online censorship and misuse of cybercrime laws. The journalists - Asad Toor, producer of TV show “Sawal with Amber”, Bilal Farooqi, news editor of The Express Tribune, Absar Alam, former chairman of Pakistan Electronic Media Regulatory Authority (PEMRA) and former anchor at AAJ news channel - were all booked under cases filed by unrelated citizens who found their online content to be seditious. In Toor’s case, it was for using “derogatory language to refer high-level government institutions, including the Pakistan Army”. In Farooq’s case, it was for sharing, “highly objectionable material” that “defamed” the

Pakistan Army on his Twitter and Facebook accounts, resulting in his detainment as well. In Alam’s case, it was similarly for alleged derogatory language against state institutions and personalities on his Twitter account.¹⁵⁸

Among the many voices of criticism, the Pakistan Federal Union of Journalists (PFUJ) were prominent in labeling the arrests a malicious trend against journalists carried out by the current government and other state elements on the basis of concocted cases.¹⁵⁹

As of year-end, little follow-up action was carried out against the journalists, further indicating the charges were part of a wider scare tactic to encourage self censorship by journalists.

Targeted: Women journalists

A growing trend of online campaigns against female media practitioners led to a group of prominent women journalists jointly condemning a, “well-defined

and coordinated campaign” of online harassment against colleagues, including threats of violence. (Read details of the case in section: Cybercrime)

¹⁵⁷ AP. (2020, July 21). Pakistani journalist and army critic released after being kidnapped in Islamabad. The Guardian. <https://www.theguardian.com/world/2020/jul/21/pakistani-journalist-known-for-criticising-military-kidnapped-in-islamabad>

¹⁵⁸ Zaman, Q. (2020, September 23). Journalists face sedition charges under cybercrime law in Pakistan. Global Voices. <https://advoc.globalvoices.org/2020/09/23/journalists-face-sedition-charges-under-cybercrime-law-in-pakistan/>

¹⁵⁹ The News. (2020, September 12). Journalist held for spreading ‘hatred’. The News. <https://www.thenews.com.pk/print/713702-journalist-held-for-spreading-hatred>

Targeted: Those critical of the state

In December, the ruling Pakistan Tehreek-e-Insaf tweeted a list of journalists “building narratives for the corrupt” from its verified Twitter accounts, triggering a large-scale online campaign of hate against those included, as well as drawing widespread criticism for such blatant threats. The list included senior journalists including Hamid Mir, Asma Shirazi, Mansoor Ali Khan, Talat Hussain. At the same time, the party tweeted a second list of journalists to be praised for fighting the “war of truth & justice”, including Imran Riaz Khan, Sabir Shair and Kashif Abbasi.¹⁶⁰

Although both tweets were deleted and the PTI apologised for the ‘mistake’, the event was indicative of state policy with regards to media and free speech, and the clear and open threat of online campaigns against those stepping out of line. A Bloomberg report also noted this threat in an interview with journalists who alleged to receive WhatsApp messages from military officials on reporting guidelines. As cited in the report, if journalists don’t comply, they get angry calls, or visits by security officials, or a social media campaign will be generated that brands them as “traitors.”¹⁶¹

NEW LEGISLATION

Removal and Blocking of Unlawful Online Content Rules, 2020

In November, the government published and brought into force a new set of regulations to govern the internet termed, “Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards), Rules 2020” (RBUOC) - a set of rules condemned and criticised from all quarters for their overextension of power, ambiguity of language and scope, exhibition of a lack of technical knowledge and disregard of basic human rights.

This same set of laws had been unveiled earlier in February to similar harsh criticism, with global internet companies including Facebook, Google,

Amazon, Apple and Twitter joining together in a group called the Asia Internet Coalition to inform the state that they would leave the country if the rules were implemented in the current form. At the time, the government retreated and said it would undertake an “extensive and broad-based consultation process with all relevant segments of civil society and technology companies.” Firdous Ashiq Awan, the adviser to the prime minister on information and broadcasting did however defend the rules, stating they were introduced to protect the social, cultural and religious values of the country, allowing for action to, “be taken against those who speak against national institutions and sovereignty.”¹⁶²

¹⁶⁰ Ahmed, R. (2020, December 4). PTI tweets and deletes list of journalists supporting ‘the corrupt’. Samaa. <https://www.samaa.tv/news/2020/12/pti-tweets-and-deletes-list-of-journalists-supporting-the-corrupt/>

¹⁶¹ Qayyum, K., & Haider, K. (2020, March 4). YouTube Becomes Refuge for Pakistan Journalists Battling Censors. Bloomberg. <https://www.bloomberg.com/news/articles/2020-03-03/youtube-becomes-refuge-for-pakistan-journalists-battling-censors>

¹⁶² Goel, V., & Masood, S. (2020, February 27). Facebook, Google and Twitter Rebel Against Pakistan’s Censorship Rules. The New York Times. <https://www.nytimes.com/2020/02/27/technology/pakistan-internet-censorship.html>

Rules in the RBUOC that introduced major changes to governance and were particularly problematic, as highlighted by the Asia Internet Coalition¹⁶³,

- 01 Social media companies must open a local office in Pakistan in order to operate in the country.
- 02 They must store all data of their Pakistani users within Pakistan.
- 03 The companies must “share all data outside of the normal, legal process that exists for normally sharing such data”.
- 04 There would be fixed and narrow turnaround times for companies to remove content when ordered to.
- 05 Introduction of “proactive monitoring” of the activity of Pakistani users, to start blocking certain types of content and denying access to their services automatically without receiving a formal “takedown” request from the government.

Non-compliance with the rules would give the PTA authority to block entire social media platforms e.g. if the company did not remove “objectionable” content within 24 hours, or in “emergency” cases, within six hours. Additionally, a penalty of up to Rs500 million would be imposed on the social media company.¹⁶⁴

The RBUOC rules extend even further, placing local internet service providers (ISPs) at par with social media companies, making all the requirements of the social media platforms applicable to ISPs as well. Consequently, the Internet Service Providers of Pakistan (ISPAK) rejected the rules outright and announced plans to oppose them.¹⁶⁵

RBUOC rules	Criticism by Reporters Without Borders ¹⁶⁶
Withdrawal or blocking of any content that “excites or attempts to excite disaffection towards the federal or provincial government” or “harms the reputation of any person holding public office.”	In practice, this would mean that any comment critical of a government official could be immediately censored.
Censorship of any content regarded as indecent, immoral or harmful to the “glory of Islam”.	Without giving any precise definition of these vague concepts, interpretation is left to PTA, which thereby acquires arbitrary and almost infinite powers.
The nature of content that is blocked and the identity of those who denounce “forbidden” content will remain confidential.	This lack of transparency will prevent the public from knowing the scale of the censorship to which they are being subjected and the identity of their censors.
It is the PTA that decides, without reference to a court, whether content violates the criminal code, and also reexamines cases in the event of a challenge, and rules on any appeals.	The rules empower PTA to act as both plaintiff and judge.

¹⁶³ Hussain, K. (2020, October 15). Battle brews between govt, Big Tech with new rules. Dawn. <https://www.dawn.com/news/1585138/battle-brews-between-govt-big-tech-with-new-rules>

¹⁶⁴ Web Desk. (2020, November 19). Pakistan social media rules: Rs500m fines, 24-hour content removal notices. Samaa. <https://www.samaa.tv/news/2020/11/social-media-regulation-rules-pakistan/>

¹⁶⁵ Ali, K. (2020, November 19). Stakeholders up in arms as social media rules notified. Dawn. <https://www.dawn.com/news/1591187>

¹⁶⁶ RSF. (2020, December 18). Analysis: Pakistani government's new online censorship strategy. Reporters Without Borders. <https://rsf.org/en/news/analysis-pakistan-governments-new-online-censorship-strategy>

ARTICLE 19 CRITICISM OF NEW RULES UNDER RBUOC¹⁶⁷

- 01 The rules grant a government agency extensive powers to order the blocking or removal of vaguely defined content in the absence of any meaningful safeguards in violation of international standards on freedom of expression.
- 02 They provide for obligations to filter content and to disclose user data at the request of the government in breach of international standards on privacy.
- 03 Whether or not content should be declared unlawful and blocked should be decided by a court or judicial authority. Instead, the Rules entrench the exercise of unfettered censorship powers by the Executive.
- 04 Website blocking is an extreme measure – analogous to banning a newspaper or broadcaster. In practice, website blocking is disproportionate in the vast majority of cases since blocking orders are not sufficiently targeted and involve the restriction of access to perfectly legitimate content.
- 05 Website blocking orders have to be implemented within 24 hours or 6 hours in cases of emergency as determined by the National Coordinator. This is clearly insufficient for social media to review blocking orders and for any suspensive appeal to take place.
- 06 Under the Rules, social media companies will be required to deploy ‘proactive measures’ to ensure the prevention of livestreaming on their platforms of any content in breach of any law or rules in force in Pakistan. ‘Terrorism, extremism, hate speech, defamation, fake news, incitement to violence and national security’ are highlighted as types of content of special concern but they are not otherwise defined by reference to any other existing legislation. We are unaware of any legal definition of ‘fake news’ under Pakistani law.

¹⁶⁷ ARTICLE 19. (2020, August 13). Pakistan: Online Harms Rules violate freedom of expression. ARTICLE 19. <https://www.article19.org//pakistan-online-harms-rules/>

"We urge the Pakistani government to reconsider this iniquitous decree which, as it stands, subjects online content to completely arbitrary censorship by the executive. These rules will deprive Pakistani citizens of reliable and independent information on the Internet, which has become one of the few remaining spaces where this is still possible. As such, they are quite simply unconstitutional."

Daniel Bastard, Head of Reporters Without Borders
Asia-Pacific desk, on RBUOC

The government's earlier promise to undertake extensive consultation with stakeholders was also criticised. Jeff Paine, managing director, Asia Internet Coalition said, "The consultation never occurred," with the forum further urging the government to "work with industry on practical, clear rules". It added that, "The draconian datalo-

calisation requirements will damage the ability of people to access a free and open internet and shut Pakistan's digital economy off from the rest of the world... It's chilling to see the PTA's powers expanded, allowing them to force social media companies to violate established human rights norms on privacy and freedom of expression."¹⁶⁸

"These new rules are just another attempt by the government to infringe upon peoples' privacy and strengthen its surveillance powers... Now PTA will get to interpret PPC sections without any check and balance and decide what content it considers unlawful, while playing the role of judge, jury and investigator."¹⁶⁹

PPP Senator Sherry Rehman, on RBUOC

¹⁶⁸ Shahzad, A. (2020, November 19). New internet rules to give Pakistan blanket powers of censorship. Reuters. <https://www.reuters.com/article/pakistan-socialmedia-censorship/new-internet-rules-to-give-pakistan-blanket-powers-of-censorship-idUSL8N2I53OW>

¹⁶⁹ Our Correspondent. (2020, November 24). Sherry Rehman slams 'draconian' censorship laws for social media. The News. <https://www.thenews.com.pk/print/748474-sherry-rehman-slams-draconian-censorship-laws-for-social-media>

Regulating web TV and over the top TV (OTT)

In January, the Pakistan Electronic Media Regulatory Authority's (PEMRA) released a document called "Consultation on Regulating the Web TV & Over the Top TV (OTT) Content Services" on its website, seeking comments on proposed regulatory guidelines that would potentially include licensing, inspection, content regulation and adding a complaint handling mechanism in place for web TV and Over the Top TV (OTT) platforms.¹⁷⁰

These suggestions were criticized by multiple stakeholders outright. As highlighted by Reporters Without Borders¹⁷¹, the more problematic proposals at the core of the document included:

Article 5.2: Web TV operators would have to pay up to Rs10 million for a licence - an enormous fee that few individuals or even media outlets would be able to afford for operating e.g. an ordinary YouTube channel.

Article 5.4: Online video media outlets could be suspended for violating PEMRA's existing code of conduct, which has already come under heavy criticism for its use by successive governments to curb freedom of expression on TV channels for years.

Reporters Without Borders called on Pakistan's parliament to completely reject the "draconian proposal" for regulating Web TV and online video streaming services, adding that, "The PEMRA document betrays an intent to censor online video content relentlessly."

In a public consultation consisting of Digital Rights Foundation (DRF), BoloBhi, Freedom Network (FN), Institute for Research, Advocacy and Development (IRADA) and Pakistan Federal Union of Journalists (PFUJ) the conclusion was reached that "[the] proposed measures, policies, drafts and proposals were rejected outright with consensus... The stakeholders rejected the drafts in their totality as attempts at expanding the Pemra footprint slyly by usurping and self-according to itself the mandate to regulate the internet with the thinly disguised aim to regulate online content". The meeting noted that the proposed measures would only serve to censor online content and curb freedom of expression and right to information.¹⁷²

On its end, PEMRA denied the allegations, and claimed that the objective of such regulations was to create a level playing field for traditional broadcasters and web TV content providers since both were competing for the same ad/subscription revenues.¹⁷³

¹⁷⁰ Dawn.com. (2020, January 28). Rights groups decry Pemra's efforts to regulate web content as 'attempt to curtail free speech'. Dawn. <https://www.dawn.com/news/1531052/rights-groups-decry-pemras-efforts-to-regulate-web-content-as-attempt-to-curtail-free-speech>

¹⁷¹ RSF. (2020, January 29). Pakistan wants to extend censorship to online video content. Reporters Without Borders. [pakistan-wants-to-extend-censorship-online-video-content](https://www.rsf.org/pakistan-wants-to-extend-censorship-online-video-content)

¹⁷² Dawn.com. (2020, January 28). Rights groups decry Pemra's efforts to regulate web content as 'attempt to curtail free speech'. Dawn. <https://www.dawn.com/news/1531052/rights-groups-decry-pemras-efforts-to-regulate-web-content-as-attempt-to-curtail-free-speech>

¹⁷³ APP. (2020, February 1). Pemra refutes media reports on regulating Web TV, OTT content services. The News. <https://www.thenews.com.pk/print/607306-pemra-refutes-me>

Criminal Law (Amendment) Bill 2020

In September, the government introduced the Criminal Law (Amendment) Bill 2020 in the National Assembly which would make ridiculing and defaming the armed forces a punishable crime. With the insertion of 500A in the Pakistan Penal Code Act 1860, whosoever intentionally ridicules, brings into disrepute or defames the armed forces or members of the armed forces shall be guilty of the offence, punishable with two years

imprisonment or Rs0.5 million fine or both. The purpose of the amendment was allegedly to prevent hatred and disrespectful behaviour against the armed forces.¹⁷⁴

In practice however, based on the targeting of journalists and others in the online space, the amendment would likely result in further clamping down on freedom of expression.

¹⁷⁴ Anis, M. (2020, September 16). Govt moves amendment bill in NA: Ridiculing armed forces, personnel to be a crime. The News. <https://www.thenews.com.pk/print/715282-govt-moves-amendment-bill-in-na-ridiculing-armed-forces-personnel-to-be-a-crime> media-reports-on-regulating-web-tv-ott-content-services

DISINFORMATION

IN COVID TIMES

As the fight against the coronavirus raged on across the globe, a second crucial battle was simultaneously fought to end a different, menacing phenomenon: disinformation/misinformation. False claims - intentional or unintentional - which circulated as mass forwarded messages on WhatsApp, ranged from incorrect and misleading information on the origin of the virus to its symptoms and so-called cures created unprecedented fear and panic.¹⁷⁵ While large volumes of disinformation remain unreported, some of the major stories of the year included:

'Emergency' notification

A fake 'emergency' notification did the rounds on social media, claiming that the health ministry had advised the public to avoid crowded places till the end of March due to the outbreak. The first paragraph of the message read: "Ministry of health's emergency notification to the public that the coronavirus influenza outbreak this time is very very serious & fatal. There's no cure once you are infected." Another slightly altered version of the same message attributed the alert to "DOH Health Bulletin to the Public". In fact, the text did not match the National Institute of Health's advisories on coronavirus. The alert also claimed that children were more prone to the virus. The health authorities had not specified any age group that was more vulnerable to the virus.¹⁷⁶

China connection

A court in Chitral ordered the arrest of a local politician for spreading fake news through social media about the coronavirus. The office-bearer allegedly spread a rumour through his Facebook account claiming that a Chinese citizen living in the area was suffering from coronavirus, which created fear among the people.¹⁷⁷

¹⁷⁵ Editorial. (2020, March 31). Covid-19 misinformation. Dawn. <https://www.dawn.com/news/1545170>

¹⁷⁶ Jahangir, R. (2020, January 28). Fact check_ Fake emergency notification on coronavirus attempts to mislead public. Dawn. <https://www.dawn.com/news/1531054>

¹⁷⁷ Our Correspondent. (2020, February 12). PTI leader arrested for spreading fake news about coronavirus spread. The News. <https://www.thenews.com.pk/print/612806-pti-leader-arrested-for-spreading-fake-news-about-coronavirus-spread>

Fake Ministry of Health

A fake Twitter account @MinHealthpk, which was designed to look like Pakistan's Ministry of National Health Services became a source of headlines in the Indian media. The account had been posting false updates about the coronavirus situation in Pakistan. Health authorities confirmed that the account was fake and its posts were untrue.¹⁷⁸

Pesticide spray

A text message claiming that military helicopters would spray pesticides to combat the coronavirus late at night did rounds on social media. The army's media wing clarified that the information was not true.¹⁷⁹

COAS infected

A fake social media post doctored to look like a Dawn.com update circulated on Facebook and Instagram claiming Army Chief Gen Qamar Javed Bajwa has been "possibly infected" with Covid-19. Further investigation revealed that this false report was circulated by the social media accounts of 'Defensive Offence'.¹⁸⁰ These same accounts later published another story using the Dawn.com template to falsely claim that Arif Wazir, a leader of the Pashtun Tahaffuz Movement was killed by the Pakistan Army.¹⁸¹

FM targeted

The Wikipedia profile of Foreign Minister Shah Mahmood Qureshi was edited to say he had passed

away. Qureshi clarified this was not the case, stating that he was fine and on the path to recovery from the coronavirus. Qureshi had tested positive for COVID-19 and had gone into self-isolation.¹⁸²

Secret operations

The Ministry of Foreign Affairs had to dismiss a story published in an Australian news outlet about an alleged Wuhan lab conducting covert operations in Pakistan. terming the report, "politically motivated and fake". The Klaxon report had quoted unnamed "intelligence experts" to claim that China's Wuhan Institute of Virology had "set up operations in Pakistan as part of a broader offensive against India and Western rivals".¹⁸³

Counter-efforts

Following the deluge of fake news surrounding coronavirus and the lockdowns, authorities in Sindh sought intervention from the Federal Investigation Agency (FIA) to trace those who are spreading "fake and unsubstantial news" through social media about "scores" of positive cases of the virus in Karachi.¹⁸⁴

Separately, digital influencers were engaged by the Prime Minister's office to produce content to counter false claims and rumors with authentic information.¹⁸⁵

The government also finalised a framework to monitor both mainstream and social media for Covid-19 disinformation and directed media regulatory bodies to take strict action against individuals propagating 'fake news'.¹⁸⁶

¹⁷⁸ Jahangir, R. (2020, March 13). Fact check_ Indian news outlets duped by fake Twitter account of Pakistan's health ministry. Dawn. <https://www.dawn.com/news/1540638>

¹⁷⁹ Jahangir, R. (2020, March 18). Viral message on pesticide spray at midnight fake, says ISPR. Dawn. <https://www.dawn.com/news/1541944/viral-message-on-pesticide-spray-at-midnight-fake-says-ispr>

¹⁸⁰ Dawn.com. (2020, April 22). Fake Facebook post posing as Dawn.com attempts to mislead public. Dawn. <https://www.dawn.com/news/1551373>

¹⁸¹ Dawn.com. (2020, May 4). Facebook removes fake news posts using Dawn.com branding. Dawn. <https://www.dawn.com/news/1554464>

¹⁸² Web Desk. (2020, July 9). FM Qureshi shoots down false reports of death. The News. <https://www.thenews.com.pk/latest/684292-indian-lobby-behind-spread-of-fake-news-regarding-foreign-minister-shah-mahmood-qureshi>

¹⁸³ Siddiqui, N. (2020, July 26). FO dismisses story on Wuhan lab conducting 'covert operations' in Pakistan as fake. Dawn. <https://www.dawn.com/news/1571239>

¹⁸⁴ Ayub, I. (2020, March 5). Sindh seeks FIA help to stop spread of 'fake' news about coronavirus. Dawn. <https://www.dawn.com/news/1538411>

¹⁸⁵ Jahangir, R. (2020, March 21). EhtiyatCorona_ Pakistan's digital influencers fight virus misinformation. Dawn. <https://www.dawn.com/news/1542602>

¹⁸⁶ Jahangir, R. (2020, July 17). Govt finalises policy to check Covid-19 disinformation. Dawn. <https://www.dawn.com/news/1569442/govt-finalises-policy-to-check-covid-19-disinformation>

THE INDIA CONNECTION

A number of disinformation campaigns related to Pakistan were amplified by Indian social media accounts in 2020.

The prominent ones included a false story about a Pakistani submarine, PNS Saad, engaging a civilian boat during Indo-Pak tensions¹⁸⁷ as well as one falsely alleging that a Pakistan Air Force (PAF) F-16 fighter jet has gone 'missing' during a 'panic situation' in Karachi. The latter surfaced the same day Indian media reported "panic" in Karachi following rumours of Indian Air Force fighters crossing the Line of Control (LoC).¹⁸⁸ In both these cases, the doctored screenshots were made to resemble the website of Dawn.com.

In another case, the Foreign Office took note of and debunked a disinformation campaign led by Indian social media and amplified by Indian news sites that claimed French authorities were deporting Pakistani citizens following Prime Minister Imran Khan's remarks denouncing President Emanuel Macron for spreading "Islamophobia".¹⁸⁹

The largest disinformation campaign led by Indian social media and widely reported as fact on Indian news sites was claims of a 'civil war' having broken out in Pakistan. The false claims included reports of tanks in the streets of Karachi as well as clashes between the police and the army,

resulting in the deaths of police officers. A fake video circulating on Twitter claimed to show some of the alleged unrest. In reality, none of it was true.¹⁹⁰ The campaign led to Pakistan asking Twitter to take "immediate action" against accounts spreading false information against the country.¹⁹¹ Early in the year, the Senate Standing Committee on Information Technology had also asked the government to enter into an agreement with Twitter's management to share information and block fake accounts. The committee members asked the authorities to identify accounts that were involved in defamation and harassment of individuals as well as organisations.¹⁹²

AFP FACT CHECK: PAKISTAN 2020

AFP Fact Check is a leading global fact-checking organisation, with dedicated journalists monitoring

online content - including content in Pakistan - to investigate and disprove false information. The list

below contains all major fact checks listed for the country across the year.¹⁹³

¹⁸⁷ Dawn.com. (2020, June 14). Fake news 'screenshot' posing as Dawn.com about PNS Saad surfaces on social media. Dawn. <https://www.dawn.com/news/1563474>

¹⁸⁸ Dawn.com. (2020, June 10). Fake news screenshot about 'missing F-16' posing as Dawn.com surfaces on social media. Dawn. <https://www.dawn.com/news/1562612/fake-news-screenshot-about-missing-f-16-posing-as-dawncom-surfaces-on-social-media>

¹⁸⁹ APP. (2020, November 1). FO denounces rumours by fake Twitter account regarding Pakistani community in France. Dawn. <https://www.dawn.com/news/1588043>

¹⁹⁰ Hussain, A. (2020, October 23). India buzzes with fake news of 'civil war' in Pakistan. BBC News. <https://www.bbc.com/news/world-asia-54649302>

¹⁹¹ Anadolu Agency. (2020, October 22). Pakistan asks Twitter to take action against fake news. Anadolu Agency. <https://www.aa.com.tr/en/asia-pacific/pakistan-asks-twitter-to-take-action-against-fake-news/2015699>

¹⁹² Ali, K. (2020, January 16). Senate panel recommends pact with Twitter to block fake accounts. Dawn. <https://www.dawn.com/news/1528568>

¹⁹³ AFP Pakistan. (2020). AFP Pakistan | Fact Check. AFP Fact Check. <https://factcheck.afp.com/afp-pakistan>

JANUARY

01 Pakistani officials deny they issued a warning over dangers of eating goat meat in relation to the coronavirus.

02

Multiple posts on Twitter and Facebook emerged that falsely claim to show a Pakistani mother refusing to allow a polio vaccinator to vaccinate her child.

FEBRUARY

01

Photos of diseased chicken have been shared hundreds of times in multiple Facebook posts falsely claim that the deadly novel coronavirus has been found in chickens in Pakistan.

02

An image of a letter has been shared hundreds of times in multiple Facebook posts claims to show a note written by the head of Jamaat-e-Islami. The letter, written in Urdu, urges the party's members to marry four women and to forgo contraceptives in order to increase party following.

03

Claims that the novel coronavirus can be cured overnight if sufferers drink freshly boiled garlic water have been shared hundreds of times in multiple posts on Facebook, Twitter and YouTube.

MARCH

01

Multiple posts shared hundreds of times on Facebook and Twitter claim Israel has no confirmed cases of the novel coronavirus, as it has already developed a "cure". The claim is false.

02

A photo of TV news anchor Mansoor Ali Khan with his wife and son at the Aurat March rally went viral, showing the news anchor's wife holding a placard that promotes "no shame" in nakedness. This claim was false; the photo was doctored to add the text to the paper that Khan's wife was holding.

APRIL

01

A video has been viewed thousands of times in multiple posts on Facebook and Twitter alongside a claim that it shows Pakistani security forces apprehending three men after they escaped from a COVID-19 quarantine centre. The claim is misleading.

02

A video of hundreds of people crossing a border has been viewed tens of thousands of times on Facebook and Twitter alongside a claim it shows people from Afghanistan entering Pakistan without being tested for the novel coronavirus. The claim is false.

03

A claim that a charitable hospital in Pakistan charged patients for novel coronavirus tests has been shared in multiple posts on Facebook and Twitter. But the claim is misleading.

MAY

01

A video has been viewed millions of times in multiple posts on Facebook which claim it is "real" clip of the Pakistan International Airlines plane crash that claimed scores of lives in the city of Karachi on May 22, 2020. The claim is false; the video was created using a flight simulator programme.

JUNE

- 02 A video of people climbing down a building has been viewed tens of thousands of times in multiple posts on Facebook, Twitter, YouTube and WhatsApp alongside a claim it shows shoppers attempting to flee a shop after police discovered it had flouted Pakistan's coronavirus lockdown. The claim is false; the footage has circulated online since at least 2015 in reports about a police raid on a brothel in Pakistan.
- 03 A video of monkeys swimming in a pool has been viewed thousands of times on Facebook and Twitter alongside a claim it was filmed was shot in the Islamabad capital during a COVID-19 lockdown. The claim is false; the video actually shows monkeys enjoying a swim at an apartment block pool in India during the COVID-19 lockdown.

JULY

- 01 A photo of a provincial chief minister has been shared thousands of times in multiple Facebook posts in May 2020 alongside a claim that it shows him violating social distancing rules during the coronavirus pandemic. The claim is false; the photo was taken in 2018 during a procession on Ashura.
- 01 A photo of a fighter jet in flames has been shared hundreds of times in multiple Facebook posts alongside a claim it shows an Indian military jet that was shot down after it flew into the airspace of neighbouring Nepal. The claim is false; the photo shows a Libyan jet that was shot in the city of Benghazi in 2011.
- 02 A photo of Nobel Prize-winning activist Malala Yousafzai standing beside a man has been shared tens of thousands of times in multiple posts on Facebook and Twitter alongside a claim he is the son of the Israeli defence minister. The claim is false; the man in the photo is in fact Faisal Iqbal, a well known Pakistani cricket player.
- 03 An image of two boxes of the same muscle relaxant with wildly different price tags has been shared thousands of times in multiple posts on Facebook. The posts claim the image is evidence of price gouging under the current government in Pakistan. The claim is misleading; both boxes show a manufacture date that predates the current government; the pharmaceutical company which produces the drug seen in the image said the higher price tag had been doctored.
- 04 Footage of an assault has been shared repeatedly in multiple posts on Facebook and Twitter alongside a claim it shows a Chinese engineer beating a Pakistani driver for falsifying petrol bills in Karachi. The claim is false; the video has circulated since at least 2016 in reports about an assault in Malaysia; the men in the footage can be heard speaking Malay and wearing a shirt that bears the logo of a Malaysian electoral campaign.

AUGUST

- 01 A video of a crocodile in a flooded street has been viewed hundreds of thousands of times on Facebook alongside a claim that it was taken in Karachi as the city continues to see widespread flooding in August 2020. The claim, however, is false; this video has circulated online since 2019 and actually shows a street in India.
- 02 A photo of a bus stuck in a sinkhole has been shared on Facebook and Twitter alongside a claim the vehicle was from a recently inaugurated fleet in Peshawar. The posts were shared thousands of times in August 2020. The claim is false; the photo shows an accident in Multan in 2018.
- 03 A video has been viewed millions of times and shared tens of thousands of times on Facebook alongside a claim it shows a Pakistan Air Force pilot flying a JF-17 fighter plane under a bridge. The claim is false; the video is computer-generated imagery from a video game.
- 04 A video has been viewed more than one million times in multiple posts on Facebook alongside a claim it shows a Sindhi-speaking “beggar” who illegally boarded a Bangkok-bound plane in Karachi. The claim is false; the video shows a Farsi-speaking man on an Iran-bound plane in the Qatari capital of Doha.
- 05 A photo has been shared thousands of times in multiple posts on Facebook and Twitter alongside a claim it shows flooding in Karachi. The claim is false; the photo in fact shows a playground in the Indian city of Mumbai.

SEPTEMBER

- 01 Multiple posts shared repeatedly on Facebook and Twitter in September 2020 claim the International Civil Aviation Organisation (ICAO), a specialised agency of the United Nations, barred the Pakistan Civil Aviation Authority (PCAA) from issuing licences to pilots, crew and engineers. The claim is false; in response to the misleading posts, the ICAO said it had not issued any such directive for Pakistan; the PCAA also said the claim was false.
- 02 A photo has been shared hundreds of times in multiple posts on Facebook which claim it shows former Prime Minister Nawaz Sharif meeting the Israeli ambassador to “sell out” Pakistan's nuclear secrets in exchange for moving his business to Israel. The claim is false; the photo has been doctored to replace the German flag with the Israeli flag; the original photo shows Sharif meeting former German Foreign Minister Guido Westerwelle in Islamabad in 2013.
- 03 A video of a woman speaking to camera has been viewed thousands of times in multiple posts on Facebook, Twitter and YouTube that claim it shows the victim of a high profile gang rape in Pakistan describing her ordeal. But the footage has been shared in a misleading context: it was originally posted on TikTok by a British woman, who said she was not the victim of the attack but was seeking to raise awareness of the crime.

- 04 A photo of Gul Panra, a popular Pashto singer, has been shared multiple times on Facebook and Twitter alongside a claim that Panra was shot dead in Peshawar. The claim is false; Panra is alive and well; the posts circulated online after a transgender woman by the same name was murdered in Peshawar.

- 05 A photo of Prime Minister Imran Khan standing in a line has been shared thousands of times on Facebook alongside a claim he queued like members of the public despite being the leader of the country. The claim is false; the photo of Khan has circulated online since at least 2017, before he was elected prime minister in August 2018.

- 06 A video that shows a man diving off a building into a flooded street has been viewed more than two million times on Facebook alongside a claim that he performed the stunt in Karachi. The claim is false; the footage in fact shows a man diving in the Indian city of Indore, which experienced major flooding in August 2020.

OCTOBER

- 01 A video claiming that a Pakistani social media star died in a car accident in August 2020 has been viewed millions of times in multiple posts on TikTok, Facebook and YouTube. The claim, however, is false: as of October 2020, TikTok star Ali Khan Hyderabad is alive and posted videos on the platform after the false claim was made; the person who posted the original misleading claim later retracted the allegation.
- 02 After Pakistani media reported on a dispute between police and the army over the arrest of an opposition politician in Karachi, scores of Facebook and Twitter posts claimed Pakistan was on the brink of civil war. The posts were amplified by mainstream Indian media, which broadcast false and misleading information, including reports that ten police officers had been killed. While Pakistan's army and police did have a disagreement over the politician's arrest, the government said no shots were fired and dismissed reports of civil war as "malicious and fabricated". The misleading posts used old and unrelated photos; Pakistan has requested that Twitter remove accounts spreading misinformation about the incident.
- 03 A video has been viewed tens of thousands of times in multiple posts on Facebook and Twitter which claim it shows a Pakistani opposition leader incorrectly giving the price of certain groceries in Pakistan. The posts claim the video is evidence that the politician is unfit to become the leader of Pakistan. The claim is false; the video has been doctored and there is no record of the politician making such a statement.

NOVEMBER

- 01 A photo of a snow-covered street has been shared hundreds of times in multiple posts on Facebook and Twitter in November 2020 that claim it was taken in Karachi. The claim is false; the photo was actually taken by an Afghan photographer in Afghanistan's capital, Kabul; weather data for Karachi shows there has been no snowfall in the city in November 2020.

- 02 Multiple TikTok and YouTube videos viewed thousands of times claim the United Arab Emirates stopped issuing visas for Pakistanis and other nationals of Muslim countries because of their continued refusal to recognise the state of Israel. The claim, however, is misleading; the UAE's suspension of visitor visas from 12 countries, including Pakistan, in mid-November 2020 was because of their high rates of Covid-19, according to Pakistan's Foreign Minister.
- 03 An image of a purported news report by a Pakistani broadcaster has been shared hundreds of times on Facebook and Twitter in November 2020 alongside a claim that Afghanistan announced a \$30 million aid package for Pakistan to support the country during the Covid-19 pandemic. The claim is false; the Pakistani broadcaster whose logo was shown in the posts told AFP it had not aired the purported segment; the Pakistani government also said the claim was "fake news".
- 04 A video has been viewed more than a million times in multiple posts on Facebook which claim it shows Pakistani army officers winning a military competition against US army officers. The claim is false; this footage actually shows an event in the 60th World Military Pentathlon Championship held in Brazil in 2013, which neither Pakistan nor the US participated in.
- 05 Clickbait headlines on several Pakistani news articles published in November 2020 claim that British film producer Jemima Goldsmith, ex-wife of Pakistani Prime Minister Imran Khan, has given birth to a baby girl. The articles were shared hundreds of times in multiple Facebook posts. The claim is false; the misleading posts link to an Instagram post by Goldsmith in which she announced the birth of her niece in April 2020.
- 06 A clip from a news broadcast has been shared in multiple Facebook and Twitter posts that claim it shows Prime Minister Imran Khan blaming Muslims for recent acts of terrorism in France. But the claim is misleading; the posts share a short, edited extract of Khan's speech in which key phrases had been cut, changing the meaning of his speech.
- 07 Two photos — one showing a pen and a pencil lying in a pool of blood and another showing an injured child — have been shared thousands of times in multiple posts on Facebook and Twitter alongside a claim they reveal the aftermath of a bombing at an Islamic seminary in Peshawar in October 2020. The claim, however, is false; the photos have circulated online in unrelated reports since August 2018 and January 2020 respectively.
- 01 A photo has been shared hundreds of times in multiple posts on Facebook and Twitter, along with a claim that it shows a jailed Pakistani opposition party lawmaker sleeping on the floor of his cell. Some posts shared the image alongside an image of the handcuffed lawmaker being escorted by a police officer. The claim is false; the photo has circulated in reports since 2008 about a person sleeping on a street in Australia.

- 02 A photo of flooding at a national monument in Lahore has been shared hundreds of times in multiple posts on Facebook and Twitter days ahead of a planned political opposition rally in the venue in December 2020. The photo was circulated alongside a claim the government flooded the venue with water in order to prevent the rally from being held there. The claim is false: the photo has circulated online since at least 2019, when Lahore was hit by heavy rain during the monsoon season.
- 03 A photo of an enormous crowd has been shared thousands of times in multiple posts on Facebook alongside a claim it shows a major political opposition rally in Lahore on December 13, 2020. The claim is false; the photo actually shows a rally in Lahore by the current ruling party in 2018.
- 04 Multiple Facebook and Twitter posts shared hundreds of times purport to show photos of a Pakistani coal miner's daughter who topped the civil service exam in 2020. The claim is false; the photos show an Afghan woman who topped her country's national university entrance exam in 2020.
- 05 A photo of three soldiers in a frozen river has been shared hundreds of times in Facebook posts that claim that it shows Pakistani soldiers defending their country at the Siachen glacier in northern Kashmir, on the border with India. The claim is false: this photo is actually a 2015 Associated Press image that shows South Korean army soldiers at a winter exercise in northeast Pyeongchang county.
- 06 Several photos have been shared hundreds of times in multiple Facebook posts which claim they show leaked copies of an entrance exam for a medical college in Pakistan. The posts also feature a photo of a handcuffed man alongside a claim he was detained for his involvement in the leak. The claim is misleading; Pakistani authorities denied the exam paper was leaked and said several people were arrested for allegedly selling fake test sheets; the structure of the purported test seen in the posts does not correspond with the structure of sample tests on the Pakistan Medical Commission's website.
- 07 A video has been viewed tens of thousands of times in multiple Facebook posts which claim it shows people waving the flags of India's ruling party in AJK. The claim is false; the original video of the rally was posted by India's Bharatiya Janata Party (BJP) on its verified Facebook account with a caption that says it was filmed in occupied Kashmir.

FINTECH & ONLINE BANKING

ANALYSIS / OPINION

Rabeel Warraich

FOUNDER/CEO OF SARMAYACAR

Fintech is perhaps the largest venture opportunity that continues to be untapped but we are seeing founders paying greater attention to this space. It is a very broad category which comprises wallets, payments, credit/financing/lending, movement of funds/cash and trading platforms. We expect these categories to mature in the coming few years as a base infrastructure now exists for business to be created. For instance:

Payments: There must be a significant offering of goods and services that are offered via digital means that push users to pay digitally. Pakistan is potentially there today. Companies like Careem/FoodPanda/Daraz have made users consume their services and have now established trust that eventual promises do come to fruition. We are now seeing local apps/app developers/e-commerce activities continuing to grow as the market is more comfortable to test out these offerings and recognize the benefits of these online solutions.

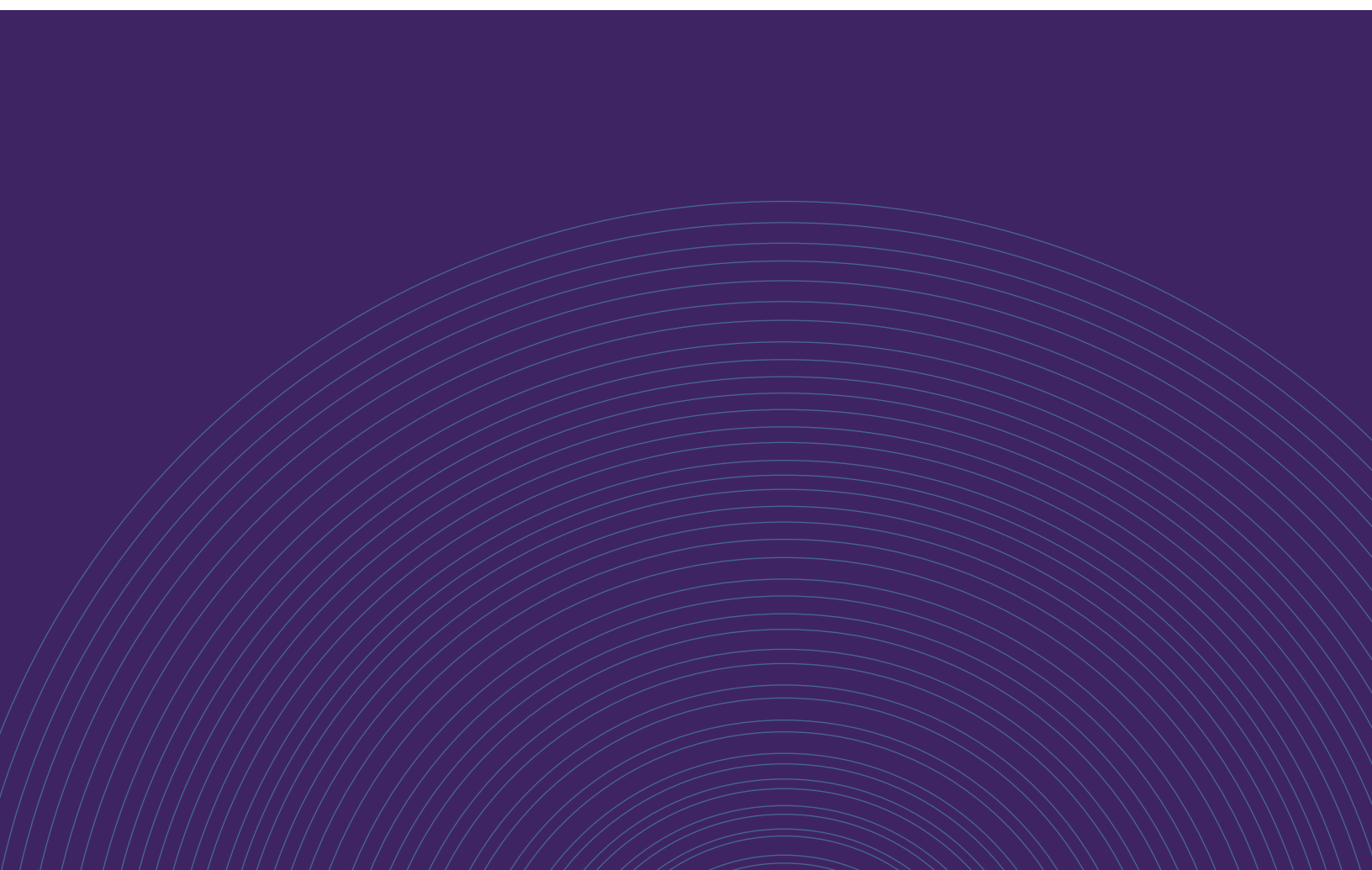
Credit/financing/lending: We are increasingly seeing startups target certain niches to collect information of these potential users (be it the kiriyana stores, or the gig economy workers, or digital wallet users) to understand how they earn and spend. These records can then form the basis on which lending decisions can be made.

While valuations remain lower than global levels, we see that being a function of the early nature of the industry. Fintechs are yet to establish meaningful scale but we are seeing the first wave of fintechs, such as our portfolio company, Simpaisa, now demonstrate month over month growth and a sticky product offering. We expect valuations to move in a meaningful manner as and when these companies achieve higher base numbers.

An aspect that needs to be highlighted is that with certain paid-up-capital requirements, it is more challenging for fintech to get off the ground and test ideas in Pakistan than other developing markets. For instance, in order to set up as a digital bank, there is a requirement to have paid-up-capi-

tal of Rs2 crore before licencing can be obtained and therefore, before operations can begin. We are however seeing movement around these regulations and certain relaxation from the authorities as they recognize the role that startups can play to expedite growth in the country's ecosystem.

Lack of interoperability is a thing of the past now, and there is an opportunity to create value for users; that's why initiatives like Raast are gaining momentum. Individual non-interoperable wallets are less relevant and there is a shift towards interoperability. Ultimately, everyone involved should be able to benefit from greater inclusivity and one solution should be able to work across all banks.



The fintech industry and online banking, while still at a nascent phase, saw growth in 2020, spurred on by increased demands by citizens seeking online solutions during periods of lockdown imposed by the government.

As noted in the State Bank of Pakistan (SBP) Annual Report 2020, overall usage of e-banking channels, as measured in transactions, rose by 4.2% in volume and 12.2% in value across FY20. Internet banking in particular grew 42.6% in volume and 71.4% in value compared to FY19. Mobile phone banking soared to 101.5% growth in volume and 103.5% in terms of value as, “Consumers increased the use of smart-

phone apps to transfer funds, pay utility bills, or carry out other payments, such as for retail purchases”.

E-commerce also grew 78.9% in volume and 33.7% in terms of value. The three channels represented only a small fraction of the total however, as volume and value were still predominantly defined by transactions in Realtime online branches (RTOB), ATMs and Point of sale (POS).¹⁹⁴

E-BANKING TRANSACTIONS

Volume in million & value in billion Rupees

	VOLUME	VALUE
	Growth	
E- Banking	4.2	12.2
Real time online branches (RTOB)	-7.3	10.1
ATM	-2.1	0.5
Point of sale (POS)	-2.9	-0.5
Internet Banking	42.6	71.4
Mobile phone banking	101.5	103.5
Call centers/IVR banking	-33.3	1.1
E-commerce	78.9	33.7

Source: State Bank of Pakistan

The SBP noted that, “The rise in payments through these channels is a promising sign and clearly in line with the SBP’s National Payment Systems Strategy (NPSS) objectives to transition people from cash-based

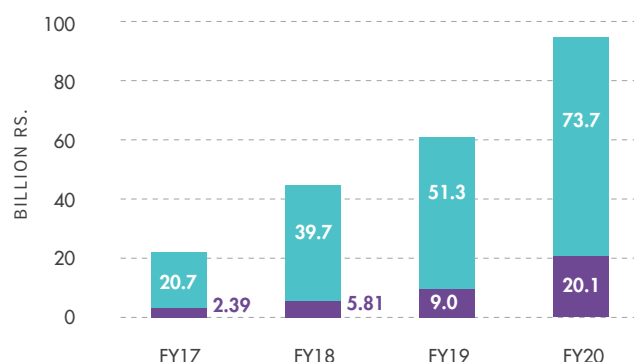
transactions to digital ones.” It was estimated that widespread use of digital payments could result in a 7% increase in the country’s GDP, create 4 million jobs and mobilize over US\$250 billion in deposits.

¹⁹⁴ State Bank of Pakistan. (2020). The State of Pakistan’s economy Annual Report. SBP. <https://www.sbp.org.pk/reports/annual/arFY20/Complete.pdf>

...AS DIGITAL PAYMENTS BECAME MORE POPULAR

Source: SBP Annual Report 2020

■ via Debit/Credit Cards
■ via branchless banking (m-wallets, QR Payment, etc.)



Additional statistics released by SBP showed that during the first quarter of 2020, there were over 193,000 active branchless banking agents in Pakistan serving a total of 48.3 million accounts, of which 57% were termed active. The accounts

held a sum of Rs33 billion in them - a tiny fraction of the Rs15,126 billion in total bank deposits in the period. The average transaction was just over Rs3,100 and with over 407 million transactions in the quarter.¹⁹⁵

RECOMMENDATIONS

In its annual report, SBP pointed out that three elements were important for the country to see success in digital finance: “(i) improvement in payment services; (ii) providing an adequate credit infrastructure (discussed above); and (iii) digital connectivity infrastructure.”

Specifically, it was recommended that, “Government authorities need to incentivize marketplaces and shopping outlets to offer mobile wallet payments, which would help increase the use of e-commerce and financial services in general.” Challenges on this front included:

01

Many online outlets and marketplaces still either do not provide an option for digital payment, or allow only bank deposits and/or credit and debit card payments, while ignoring the growing mobile wallet users. Small businesses, in particular, prefer COD.

02

Many banks do not allow the issued debit cards to be used for online purchases or require customers to activate such a facility for every transaction.

03

Even in cases where payment gateways and platforms are provided, lack of market-level standardization, lengthy and repetitive payment procedures, absence of escrow facilities, and low user-friendliness, discourage consumers from choosing online payment channels.

04

Credit card penetration in the economy is very low and limited to higher- middle to high-income individuals.

¹⁹⁵ Hassan, T. (2020, August 1). Sorry, JazzCash & Easypaisa; the fintech revolution for the unbanked is finally here. Profit. <https://profit.pakistantoday.com.pk/2020/08/01/sorry-jazzcash-the-fintech-revolution-for-the-unbanked-is-finally-here/>

Another recommendation was:

“Federal and provincial governments must incentivize consumers, merchants, and other businesses to pay or receive their payments digitally. As highlighted earlier, a large number of debit and credit cards are being used to withdraw cash through ATMs.”

The report also pointed to the need for:

“overall orientation of the economy towards digitization” with well-integrated digitized services and market players (telcos and banks) incentivised to, “be more cooperative with each other and be open to the whole ecosystem.”¹⁹⁶

TELCOS VS BANKS

This year saw greater competition between the telecom and banking industries, given that most of the telcos have now firmly established themselves as financial institutions with offerings that compete with banks. Jazz has the Mobilink Microfinance Bank and its Jazz Cash mobile wallet/payment services offering; Telenor has the Telenor Microfinance Bank

and EasyPaisa; and Ufone has U Microfinance Bank. As highlighted in a Profit Magazine report, telcos and banks largely operated in silos rather than cooperatively sharing infrastructure and protocols that allow for interoperability between the companies that would greatly benefit customers. The report further stated:

The solution, of course, is obvious: persuade the banks and the telecom companies to collaborate and utilise their technology and financial infrastructure to create a low-cost banking solution for the unbanked population. That, however, appears to be easier said than done, given the competitive nature of the financial services industry in Pakistan in general and the competition to become the dominant payments platform in particular... What is needed here is a joint set of protocols that allow for interoperability between each of the branchless banking providers. That interoperability is something that the State Bank is now mandating through the introduction of the Asaan Mobile Account (AMA).¹⁹⁷

¹⁹⁶ State Bank of Pakistan. (2020). The State of Pakistan's economy Annual Report. SBP. <https://www.sbp.org.pk/reports/annual/arFY20/Complete.pdf>

¹⁹⁷ Hassan, T. (2020, August 1). Sorry, JazzCash & Easypaisa; the fintech revolution for the unbanked is finally here. Profit. <https://profit.pakistantoday.com.pk/2020/08/01/sorry-jazzcash-the-fintech-revolution-for-the-unbanked-is-finally-here/>

The AMA is part of the SBP's attempt to bring the unbanked onboard with digital financial services offered through the ease of mobile phones. As noted in the SBP Annual Report, "Interoperability must be focused upon and incentivized. For example, the current mobile wallet infrastructure allows interoperability among all service providers via 1-Link. However, the players are not fully utilizing this facility, mainly to retain their existing market shares. In particular,

"major telecom players are hesitant to share access to their sizable agent networks that they have established over the past decade or so. In the long term, the provision of an integrated channel would increase the overall pie of the digital users, which would also lead to an increase in the share of users of all the service providers."

The SBP aimed to mandate both telcos and banks to open up all their networks through this initiative using an interoperable network, powered by a third-party service provider (TPSP). It would allow customers and branchless banking agents to conduct transactions through accounts from any institution holding the license. The AMA would operate similar to sending SMS messages to conduct transactions.¹⁹⁸

SBP had issued two Third Party Service Provider (TPSP) licences in 2018 to Virtual Remittance Gateway (VRG) and Digital Bridge (DBL) in this regard. In August this year, VRG aired an advertisement, in all good faith, that it is appropriate to take people of Pakistan on board on VRG's preparedness and 'readiness to launch' the commercial services soon and to give people the gift of AMA Scheme, but this gift will not be given until PTA allows VRG to do so, for which people have been waiting since many years.

It was added that a pilot phase had been completed this year with the opening of 108,280 AMA accounts and more than 3.2 million transactions.¹⁹⁹

This allegation of delays on the part of PTA were countered by the regulator who said no commencement certificate was given to VRG for commercial operations of AMA. It alleged that VRG had launched an "ill-intended" campaign to malign PTA and influence regulatory decision making prior to processing of a commencement certificate.²⁰⁰

A tussle was also seen in the fintech industry with the creation of two parallel associations laying claim to representing the interests of the industry. The Fintech Association of Pakistan (FAP) was the first to be founded, but its inclusion of major commercial banks and telco banks as members was seen as problematic, resulting in the creation of the Pakistan Fintech Association (PFA) that excluded those major players.²⁰¹

¹⁹⁸ Hassan, T. (2020, August 1). Sorry, JazzCash & Easypaisa; the fintech revolution for the unbanked is finally here. Profit. <https://profit.pakistantoday.com.pk/2020/08/01/sorry-jazz-cash-the-fintech-revolution-for-the-unbanked-is-finally-here/>

¹⁹⁹ News Desk. (2020, August 16). VRG denies launching AMA Scheme, says ad aired only to create awareness. The Express Tribune. <https://tribune.com.pk/story/2259790/vrg-denies-launching-ama-scheme-says-ad-ai-red-only-to-create-awareness>

²⁰⁰ Our Correspondent. (2020, August 19). Asaan Mobile Account to launch despite licensee's violations. The News. <https://www.thenews.com.pk/print/702578-asaan-mobile-account-to-launch-despite-licensee-s-violations>

²⁰¹ Hassan, T. (2020, October 11). FAP vs PFA: Who has the right credentials to lead Pakistan's fintech industry? Profit. <https://profit.pakistantoday.com.pk/2020/10/11/as-the-fintech-industry-takes-shape-in-pakistan-a-tussle-over-who-will-represent-it-ensues/>

LAUNCHES AND FUTURE PLANS

Roshan Digital Accounts launch

Aimed at providing banking facilities to millions of non-resident Pakistanis, the Roshan Digital Account initiative of SBP and the PTI-led government was launched in September in collaboration with local banks. The accounts can be opened and operated entirely online to facilitate the diaspora, offering regular bank account services as well as e-commerce, bill payments, investment in Naya Pakistan Certificates (NPCs) and the stock market etc.²⁰²

EasyPaisa partners with PayFast

EasyPaisa partnered with fintech PayFast to use its gateway for the company's mobile wallet users. PayFast would offer multi-instrument acceptance of scheme cards, mobile wallets and bank account numbers, as well as easy to use digital sign-up, APIs and plugins, fraud detection, digital billing and invoice systems etc.²⁰³

TAG approved

Fintech startup TAG was approved by SBP to operate as an Electronic Money Institution (EMI). The app would allow users to, "open mobile wallets and get debit cards" to conduct numerous forms of online transactions.²⁰⁴

JazzCash partners with Mastercard

One of the major players, JazzCash mobile wallet partnered with payment technology leader Mastercard to enable merchants to accept digital payments from customers, digitize the supply chain and move to cashless operations.²⁰⁵

NayaPay joins Visa Fintech Fast Track

Local Electronic Money Institution (EMI) NayaPay joined the Visa Fintech Fast Track program to speed up integration with Visa to allow the company to take advantage of Visa global payments network. This would offer several advantages to users including being able to accept funds instantly and directly into their NayaPay wallets from Visa cards globally, perform online and in-store transactions as well as withdraw cash.²⁰⁶

NBP 'Huawei Pay' launches

National Bank of Pakistan launched NBP 'Huawei Pay' powered by UnionPay International to allow users to make payments with Huawei and Honor smartphones by adding UPI Virtual cards to Huawei Pay.²⁰⁷

NIFT and Checkout.com collaborate

A government-led project was launched between the country's largest transactional clearing facilitator National Institutional Facilitation Technologies (NIFT) and Checkout.com, a cross-border payment service provider aimed at improving and streamlining international digital payments. This would offer, "A borderless experience for business and consumers alike, promoting digital payments and settlements for exports and digital commerce across Pakistan."²⁰⁸

²⁰² Ministry of Foreign Affairs. (2020). Roshan Digital Account. Ministry of Foreign Affairs. <http://mofa.gov.pk/roshan-digital-account-5/>

²⁰³ PR. (2020, September 8). Easypaisa, PayFast collaborate to accelerate online payments. Business Recorder. <https://www.brecorder.com/news/40017119/easypaisa-payfast-col-laborate-to-accelerate-online-payments>

²⁰⁴ Saeed, F. (2020, November 3). Pakistan's Fintech startup gets SBP's approval to operate as electronic money institution. Mashable Pakistan. <https://pk.mashable.com/tech/5756/pakistan-fintech-startup-gets-sbps-approval-to-operate-as-electronic-money-institution>

²⁰⁵ The News. (2020, May 6). JazzCash partners with Mastercard. The News. <https://www.thenews.com.pk/print/654547-jazzcash-partners-with-mastercard>

²⁰⁶ Advertisement. (2020, August 1). NayaPay and Visa partner to fast-track digital payments in Pakistan. Dawn. <https://www.dawn.com/news/1571618/nayapay-and-visa-partner-to-fast-track-digital-payments-in-pakistan>

²⁰⁷ BR Web Desk. (2020, January 16). NBP team up with UnionPay to launch Huawei Pay in Pakistan. Business Recorder. <https://www.brecorder.com/news/562122/nbp-team-up-with-union-pay-to-launch-huawei-pay-in-pakistan>

²⁰⁸ Our Correspondent. (2020, September 25). Govt kicks off project to promote international digital payment. The News. <https://www.thenews.com.pk/print/719598-govt-kicks-off-project-to-promote-international-digital-payment>

Japanese firms look to invest

Two of Japan's largest IT firms, Japan Communications Inc and Safran Group, unveiled plans to invest in a fintech project in Pakistan. The aim would be to introduce FinTech Platform over SIM, which allows financial transactions with digital cameras.²⁰⁹

Regulating cryptocurrency

The Securities and Exchange Commission of Pakistan (SECP) initiated forming a regulatory framework to govern and regulate trading of cryptocurrency in Pakistan. It said that the regulations would increase capacity in financial markets and allow more liquidity flow in secondary markets.²¹⁰

Financial inclusion push

As part of its five-year National Financial Inclusion Strategy (NFIS), the SBP pushed forward a number of initiatives and changes in policy across the year. This included:

- 01 Establishment of a public-private coordination mechanism that helped identify key reforms such as reducing the cost of NADRA services, opening of unstructured supplementary service data (USSD) for financial transactions, taxation reforms for Branchless Banking (BB) agents, and promotion of Government-to-Persons payments through bank accounts.
- 02 Regulatory reforms to promote digital financial services, such as the issuance of Mobile Banking Interoperability regulations and revised regulations for Branchless Banking (BB).
- 03 Development of the National Payment Systems Strategy (NPSS), which set a roadmap for the design of a digital National Payments System.
- 04 Development of the Asaan Mobile Account (AMA) scheme for interoperability of BB accounts on the USSD channel.
- 05 Establishment of the Digital Financial Services Innovation Challenge Facility (ICF) to support financial service providers, financial technology providers and institutions to develop new or expand existing digital financial products, services and delivery platforms.
- 06 Development of a scheme for the promotion of workers' remittances through mobile wallets.
- 07 Establishment of the Secured Transactions Law and E-Registry for the promotion of SME Finance.
- 08 Launch of the National Financial Literacy Program (NFLP) to impart basic financial education among
- 09 youngsters and the low-income segment.
- 10 Working on the development of a Micropayment Gateway (MPG), in collaboration with the Bill & Melinda Gates Foundation and Karandaaz.

²⁰⁹ Siddiqui, I. (2020, August 22). Japan's IT giants aim to tap Pakistan's FinTech potential. The News. <https://www.thenews.com.pk/print/704090-japan-s-it-giants-aim-to-tap-pakistan-s-fintech-potential>

²¹⁰ Saeed, F. (2020, November 12). SECP considers regulating digital, virtual assets. Mashable Pakistan. <https://pk.mashable.com/virtual-currency/5865/secp-considers-regulating-digital-virtual-assets>

STARTUP FUNDING

Despite, and in some cases because of, the challenges of a global pandemic, funding for startups including fintech rose across 2020.²¹¹






In its Pakistan Venture Markets Summary Report, Dubai-based data portal MAGNiTT highlighted that,

“2020 saw \$77M invested in Pakistan-based startups, a 97% increase year-over-year. In a record for Pakistan, deals increased significantly, to 48 startup investment transactions up 45%.”

It noted that the “record high transactions” reversed the overall trend seen in Middle East and North Africa (MENA) countries, where overall deals were down 13%. Transport overtook e-commerce in terms of total funding, accounting for 28% of capital invested. E-commerce ranked first in number of deals with 33% of total, followed by FinTech at 11%.

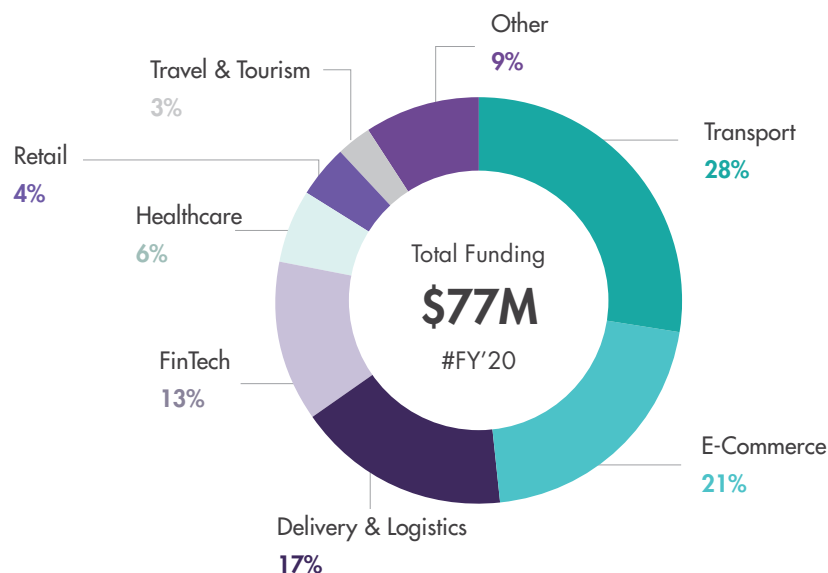
MAGNiTT PAKISTAN VENTURE MARKETS SUMMARY

Volume in million & value in billion Rupees

	FUNDING ROUND	STAGE	MONTH
	\$22M	Series A	July
	\$13M	Series B	September
	\$9M	Series A	December
	\$2.6M	Seed	October
	\$2.3M	Pre - Seed	October

²¹¹ MAGNiTT. (2021, January). 2021 Pakistan Venture Investment Summary. MAGNiTT. <https://magnitt.com/research/2021-pakistan-venture-investment-summary-50740>

INDUSTRY % SHARE OF TOTAL FUNDING IN 2020



In a Khaleej Times report, Omer Khan, founder and CEO of Pakistan-based financial technology startup PostEx shared that the country had been comparatively slow to embrace fintech. "Comprising PostEx, Finja, Easypaisa and numerous other names, Pakistan has around 100 fintech companies. These include startups, banks and telecom firms, providing digital financial services. Such product groups involve general online and mobile banking, micro-financing, mobile wallets and payment gateways," Khan shared, adding that there was a great need for easy-to-access financing solutions for the SME sector. He also pointed towards initiatives like SECP Regulatory Sandbox 2020 as positive developments which would encourage startups to experiment with a wide range of innovative new products and services without falling under existing regulations.²¹²

In a recent interview, Adnan Ali, CEO Avanza Premier

Payment Services Private Limited (APPS) expressed the view that, "Fintechs are working under very tough circumstances and it is not easy to establish one.

Most of our business tycoons are not involved directly in investment areas. Unlike other startups, fintechs, which are working in the banking sector, need to get applicable licences such as for payment system operator/provider (PSO/PSP) or electronic money institutions (EMI). In both cases there is also a capital requirement of Rs200 million which is quite justified as it takes 1.5-2 years for the fintech to develop.

Hence funds are in reality consumed in capex and opex such as staff salary office expenses, etc." He added that, "Building relationships with banks is never easy for new finetchs, establishing their trust and being able to develop a sustainable ecosystem and to penetrate the market where existing players dominate like easypaisa, Jazzcash and banks, which provide gateways, is a herculean task."²¹³

²¹² Rizvi, M. (2020, September 7). Pakistan wants mega bite of digital future. Khaleej Times. <https://www.khaleejtimes.com/business/global/pakistan-wants-mega-bite-of-digital-future>

²¹³ Zaidi, E. (2020, September 8). 'No matter how obstructive the present be, ecommerce is the future'. The News. <https://www.thenews.com.pk/print/711489-no-matter-how-obstructive-the-present-be-ecommerce-is-the-future>

E-COMMERCE

BY THE NUMBERS

The pandemic profoundly impacted e-commerce in Pakistan this year. As stated in its Annual Report 2020, the SBP estimated that Pakistan's e-commerce market saw a year-on-year growth of 55% in fiscal year 2020 totaling Rs234.6 billion in value. The number of registered e-commerce merchants also increased by 25.3% in FY20 as compared to 24.5% in FY19.²¹⁴

This climb continued in the first quarter of FY21, where the e-commerce market saw transactions increase by 77% and value by 47% when compared to the same period the previous year. This was reported to be the reason behind mobile banking transactions increasing by 211% in value year-on-year, as well as internet banking increasing by 89% in value in this period.²¹⁵ Additionally, the number of registered e-commerce merchants increased by more than 30% to 1,707 by June, 2020.²¹⁶

Noting a trend, the SBP shared that the second quarter of FY21 saw card-based transactions on e-commerce platforms increase substantially. A total of 5.6 million transactions were processed through payment cards amounting to Rs15 billion, as compared to the first quarter of the year which saw 3.9 million transactions valuing 11.9 billion. This was seen to mark a shift in consumer behaviour, indicating a more market-friendly landscape for payments.²¹⁷

With such growth, led by e-commerce, The state bank claimed that electronic payments would help the country's economy by as much as seven percent, create four million jobs and boost GDP by \$36 billion by 2025.²¹⁸

²¹⁴ State Bank of Pakistan. (2020). The State of Pakistan's economy Annual Report. SBP. <https://www.sbp.org.pk/reports/annual/arFY20/Complete.pdf>

²¹⁵ PPI. (2020, December 3). SBP sees significant growth in online transactions during July-Sept quarter. Profit Magazine. <https://profit.pakistantoday.com.pk/2020/12/03/sbp-sees-significant-growth-in-online-transactions-during-july-sept-quarter/>

²¹⁶ Monitoring Report. (2020, October 20). E-commerce market booms as Pakistan adapts to digital payments. Profit Magazine. <https://profit.pakistantoday.com.pk/2020/10/20/e-commerce-market-booms-as-pakistan-adapts-to-digital-payments/>

²¹⁷ Our Correspondent. (2020, March 19). E-banking transactions rise 22pc to Rs21.4 trillion. The News. <https://www.thenews.com.pk/print/806408-e-banking-transactions-rise-22pc-to-rs21-4-trillion>

²¹⁸ Saeed, A. (2020, July 6). Pakistan e-commerce giant says online sales surged through coronavirus lockdowns. Arab News. <https://www.arabnews.pk/node/1700646/pakistan>

Separately, Pakistan Software Houses Association (PASHA) Chairman Shehzad Shahid claimed that, “The government has targeted to achieve up to \$5 billion in e-commerce sales during the next three years”.²¹⁹

Encouragingly, a global survey of 12,000 adults by Standard Chartered found that almost three-quarters of Pakistani respondents were more positive about shopping online.²²⁰ Almost 72% of local respondents agreed that the pandemic had made them more positive about online shopping, but also made them more careful with their spending, while also wanting new ways to track their money digitally. A total of 37% said they preferred online payments to in-person card or cash payments, as compared to



Source: Standard Chartered global survey

24% previously. The survey found this to be true across a range of purchases, from groceries and travel to digital devices.

E-commerce ventures were also successful in securing funding across the year (see section: Fintech & online banking), indicating further growth in terms of volume, value as well as diversity of available platforms and services across the coming years.

IN COVID TIMES

The onset of the pandemic and large-scale lockdowns across the country had a major impact on traditional modes of shopping. As shared by Rana Tariq Mehboob, chairman for Pakistan’s Chainstore Association which represents 200 of the country’s most prominent retailers, “The footfall on stores and shopping malls has declined up to 80 percent after the outbreak of the coronavirus while revenue of the retail business has been reduced to only 25 percent... The majority of our revenue is from online now. The online business has grown up to 50 percent... but businesses still aren’t sustainable.”²²¹

A report in The Express Tribune highlighted how the government’s sudden imposition of lockdowns took a major toll on small-scale vendors unable to transition online - specifically those selling on pushcarts, through cars and makeshift stalls. Bohri Bazaar and Mochi Gali Traders Association president Mansoor Jack shared that only a few traders have been able to move online. “Not more than five per cent of the city’s traders are operating online,” he claimed, adding that most customers were wary of making purchases online, worried they would be delivered expired or substandard products.²²²

²¹⁹ Our Correspondent. (2020, August 15). Covid-19 boosts Pakistan’s e-commerce sector. The Express Tribune. <https://tribune.com.pk/story/2259705/covid-19-boosts-pakistan-e-commerce-sector>

²²⁰ Our Correspondent. (2020, December 23). International survey finds rapid shift toward online payments in Pakistan. The News. <https://www.thenews.com.pk/print/762856-international-survey-finds-rapid-shift-toward-online-payments-in-pakistan>

²²¹ Saeed, A. (2020, July 6). Pakistan e-commerce giant says online sales surged through coronavirus lockdowns. Arab News. <https://www.arabnews.pk/node/1700646/pakistan>

²²² Our Correspondent. (2020, May 7). Covid-19 in Pakistan: Online retail offers little hope for vendors. The Express Tribune. <https://tribune.com.pk/story/2215840/1-covid-19-pakistan-online-retail-offers-little-hope-vendors>

SBP ROLE

The SBP saw the pandemic as being a key factor in e-commerce growth. As shared in its Annual Report, “As there was a steep rise in demand for deliveries, businesses also started optimizing their inventory management towards a just-in-time model... In major metropolitan cities, businesses started using physical stores as warehouses for timely order fulfilment and reducing delivery times. Similar to retailers joining online platforms, many new restaurants registered with online food delivery channels, providing

discounts and ensuring compliance with safety protocols to attract orders. In cities where such platforms were absent, phone-call ordering became the norm.”²²³ The SBP also instructed banks to waive service charges on fund transfers through online banking channels to ensure customer and employee safety during the pandemic, as well as to push digital payments, providing a further boost to the sector.

Other initiatives by SBP during the pandemic included relaxing a requirement for smaller

entrepreneurs related to their business-to-consumer e-commerce exports ; ²²⁴ a five-fold increase in payment limits to \$25,000 for freelancers working in the digital and IT sector allowing for greater opportunities of both Business to Customer (B2C) and Customer to Business (C2B) transactions through home remittance channels²²⁵, and an e-commerce automated clearance facility developed with Pakistan Customs, Ministry of Commerce and e-commerce operators to promote consumer e-commerce exports.²²⁶

ONLINE PLATFORMS RESPOND

The impact of the pandemic was also highlighted by players big and small in the e-commerce space, with both benefits and challenges coming to the fore. The most important benefit however was arguably lowering footfall in brick and mortar shops and preventing the spread of the virus.

Adnan Ali, CEO Avanza Premier
Payment Services Private Limited

(APPS), shared in an interview that, “Post COVID, we’ve seen major growth in the digital space for example the use of e-wallets increased 8.2 times, on Daraz, digital payments contributed 32 percent of the total consumer spending in March, internet traffic increased by 15 percent, according to Pakistan Telecommunication Authority (PTA), utilisation of cloud-based computing

is now 10 times higher than three years ago, so it is quite evident that COVID played a catalytic role.”²²⁷ He added that, “With increasing online deliveries, and innovations such as contactless deliveries becoming the new norm, companies have actually started changing the way they operate and picking issues in their pre-existing business models to migrate to the digital payment side.”

²²³ State Bank of Pakistan. (2020). The State of Pakistan's economy Annual Report. SBP. <https://www.sbp.org.pk/reports/annual/arFY20/Complete.pdf>

²²⁴ Our Correspondent. (2020, December 3). State Bank eases regulations for ecommerce exporters. The News. <https://www.thenews.com.pk/print/752679-state-bank-eases-regulations-for-ecommerce-exporters>

²²⁵ Ali, M. (2020, February 12). SBP announces five-fold increase in payment limit for freelancers. Profit Magazine. <https://profit.pakistantoday.com.pk/2020/02/12/sbp-announces-five-fold-increase-in-payment-limit-for-freelancers/>

²²⁶ APP. (2020, November 14). FBR develops e-Commerce clearance facility. The News. <https://www.thenews.com.pk/print/743432-fbr-develops-e-commerce-clearance-facility>

²²⁷ Zaidi, E. (2020, September 8). ‘No matter how obstructive the present be, ecommerce is the future’. The News. <https://www.thenews.com.pk/print/711489-no-matter-how-obstructive-the-present-be-ecommerce-is-the-future>

The pandemic has created an environment in the country for many people to go digital and use online services. As a result, the e-commerce market has gained momentum and will continue to grow manifold in Pakistan as well as various other countries.

Adnan Ali, CEO Avanza Premier Payment Services
Private Limited (APPS)

Lockdowns forced even traditional supermarkets like Imtiaz Supermarket to change their business model to focus online. Consequently, during the first 100 days, the chain's three Lahore-based stores pulled in Rs600 million, Rs700 million and Rs800 million each in e-commerce sales. Other businesses adapted by launching new products and services. Foodpanda accelerated the launch of grocery delivery service PandaMart to compete

with Daraz and a host of smaller players who entered the market together. On its part, Daraz launched the 'Humqadam' program, which invited local Small and Medium Enterprises (SMEs) to set up stores on the platform with added business and financial support, including a waiver of commission fees for a few months.²²⁸ It was highlighted that the pandemic shaped customer buying on Daraz in a number of ways:

- Travel and movement related products such as luggage and cameras declined
- Health products, groceries, and home/living products grew in sales
- A focus on self improvement and home improvement was seen
- Electronics and lifestyle products dominated, forming 40% and 25% of sales

One key insight shared by Daraz was the realization that along with extremely high demand for staples like groceries, demand for non-essential items also remained high (including a 35-40% surge during the first lockdown), likely driven by people being forced to stay home. Another change in behaviour was bulk buying to minimize the number of orders, which at times left the company unable to cope with demand.²²⁹

²²⁸ Javed, B. K. (2020, July 5). Survive or Thrive – how eCommerce reacted to C19 lockdown. Profit Magazine. <https://profit.pakistantoday.com.pk/2020/07/05/survive-or-thrive-how-ecommerce-reacted-to-c19-lockdown/>

²²⁹ Niazi, A. (2020, May 4). The pandemic is e-commerce's time to shine. But will it last? Profit Magazine.

THE COD DILEMMA

The last few years have seen the local e-commerce industry struggle with one enormous challenge: Cash on Delivery (COD), the payment method a vast majority of Pakistanis still prefer over all other payments, and a major impediment to the industry's growth. And 2020, despite minor improvement in indicators, proved to be no different.

As shared by Rawalpindi Chamber of Commerce and Industry (RCCI) President Saboor Malik, the country still lacks digital platforms for e-payments, and consequently, most payments are made through COD.²³⁰

Over 66%

OF PAYMENTS FOR E-COMMERCE
ARE MADE THROUGH COD

Rawalpindi Chamber of Commerce
and Industry (RCCI) President Saboor Malik

Badar Khushnood, head of P@SHA e-commerce committee expressed similar views in an interview, citing low financial inclusion, weak digital payment infrastructure and lack of trust of global platforms in local online traders as major concerns. He claimed that almost 90% of payments were being made through COD. "One reason behind this is the lack of a digital payment mechanism, another is lack of satisfaction on the part of public, which wants the delivery of goods first before paying for them keeping in view the fact that refunds through digital means consume a lot more time than cash refund," he shared, adding that the SBP needed to provide guidance in the form of policies and regulations to resolve this issue.²³¹ As shared in the same report, another major factor is fraudulent activities by online traders who sell fake or low quality products. Enablers Chief Executive Officer Saqib Azhar shared that the world does not trust the local digital

payment mechanism and the country's traders.

The SBP took note of the issue in its Annual Report 2020, sharing some cause for optimism, such as, "The focus of e-commerce platforms on enhancing the customer experience via feedback and ratings mechanism have helped build customers' trust, while forcing sellers and vendors to improve their service delivery and product quality. Although cash on delivery remains the most preferred mode of payment, use of debit/credit cards and IBFT has risen in both volume and value terms. It also acknowledged the COD dilemma however, pointing out that, "The increasing trend of the already high level of cash penetration in the economy continues to undermine efforts to enhance the digital payments system infrastructure in the country. The existing customer base also tends to avoid making cashless payments."²³² Key takeaways for the year were:

- COD transactions might have increased due to a sharp increase in cash penetration in the economy. A majority of people rely on banks and branchless banking agents to make transfers and payments, and with reduced mobility due to the pandemic, many were unable to use either.
- Cash preference remained high as people held onto money as a precautionary measure.
- For businesses, getting into e-commerce was the only option to keep operations afloat, but lockdowns made it hard to get on-boarded for online payments, forcing them to use COD only. This increased cash transactions in e-commerce.
- The e-commerce industry was also not ready to cater to a sudden surge in customer demand during the pandemic. Many orders were canceled, refunds not processed on time or delayed infinitely etc. This caused citizens to avoid digital payments and rely on COD to minimize risk in their purchases.

²³⁰ TLTP. (2020, August 25). E-commerce can create 2m jobs, add \$40bn to GDP in two years: RCCI. Profit Magazine. <https://profit.pakistantoday.com.pk/2020/08/25/e-commerce-can-create-2m-jobs-add-40bn-to-gdp-in-two-years-rcci/>

²³¹ Haq, S. (2020, October 17). Low financial inclusion hurts e-commerce. The Express Tribune. <https://tribune.com.pk/story/2268715/low-financial-inclusion-hurts-e-commerce>

²³² State Bank of Pakistan. (2020). The State of Pakistan's economy Annual Report. SBP. <https://www.sbp.org.pk/reports/annual/arFY20/Complete.pdf>

Bytes for All (B4A), Pakistan is a research think tank with a focus on Information and Communication Technologies (ICTs). It experiments with and organize debates on the relevance of ICTs for sustainable development, democracy and social justice. Its strategic plan delivers in following key result areas (KRA):

- Securing digital rights for civil liberties;
- Strengthening holistic safety of citizens in cyberspace;
- Technology for environmental sustainability; and
- Network building at national, regional and global level.

To deliver above-mentioned KRAs, B4A conducts research for evidence-based policy advocacy, field projects and capacity building of citizens.

More information about B4A is accessible at www.bytesforall.pk.

ABOUT FRIEDRICH-EBERT-STIFTUNG

Friedrich-Ebert-Stiftung (FES) is the oldest political foundation in Germany. The foundation is named after Friedrich Ebert, the first democratically elected president of Germany. The Friedrich Ebert Stiftung established its Pakistan Office in 1990. FES focuses on enhancing dialogue for mutual understanding and peaceful development in its international work. Social justice in politics, the economy and in the society is one of our leading principles worldwide. FES operates 107 offices in nearly as many countries.

In Pakistan, FES has been cooperating with governmental institutions, civil society, and academic organizations and carrying out activities;

- To strengthen democratic culture through deliberative processes and informed public discourse;
- To promote and advocate social justice as an integral part of economic development through economic reforms and effective labor governance;
- To enhance regional cooperation for peace and development

Disclaimer:

The views expressed in this report are exclusively of the author (s)

LIST OF ACRONYMS

IT	Information Technology	Page - 04
UN	United Nations	Page - 04
ICT	Information Communication Technology	Page - 05
FIA	Federal Investigation Agency	Page - 05
5G	Fifth Generation	Page - 07
4G	Fourth Generation	Page - 07
PTA	Pakistan Telecommunication Authority	Page - 08
PMCL	Pakistan Mobile Communications Limited	Page - 08
PTML	Pakistan Telecommunications Mobile Limited	Page - 08
CMPAK	China Mobile Pakistan	Page - 08
BB	Broadband	Page - 09
EIU	Economist Intelligence Unit	Page - 09
GDP	Gross Domestic Product	Page - 09
IHC	Islamabad High Court	Page - 13
FATA	Federally Administered Tribal Areas	Page - 13
GB	Gilgit Baltistan	Page - 13
AJK	Azad Jammu and Kashmir	Page - 13
HEC	Higher Education Commission	Page - 13
USF	Universal Service Fund	Page - 14
SCO	Special Communication Organization	Page - 14
CPEC	China Pakistan Economic Corridor	Page - 15
CPFOP	China-Pakistan Fiber Optic Project	Page - 15
NHA	National Highway Authority	Page - 15
ML-I	Main Line I	Page - 15
DIRBS	Device Identification, Registration and Blocking System	Page - 15
PECA	Prevention of Electronic Crimes Act	Page - 15
SRO	Statutory Regulatory Orders	Page - 15
CDWP	Central Development Working Party	Page - 15
FR	Frontier Regions	Page - 16
FY	Fiscal Year	Page - 16
IDA	International Development Assistance	Page - 17
SAPM	Special Assistant to the Prime Minister	Page - 18
PTI	Pakistan Tehreek-E-Insaf	Page - 18
DPF	Digital Pakistan Foundation	Page - 19
CEO	Chief Executive Officer	Page - 19
NITB	National Information Technology Board	Page - 20
CDA	Capital Development Authority	Page - 20
NADRA	National Database and Registration Authority	Page - 20
LG&CD	Local government and community development	Page - 20
PSLM	Pakistan Social and Living Standards Measurement	Page - 21
HIES	Household Integrated Economic Survey	Page - 21

LIST OF ACRONYMS

FIES	Food Insecurity Experience Scale	Page - 21
GIS	Geographic Information System	Page - 21
ROW	Right of Way	Page - 21
PMIS	Prison Management Information System	Page - 22
FLMIS	Flour Ledger Management Information System	Page - 22
STEP	Special Talent Exchange Program	Page - 23
CSJ	Centre for Social Justice	Page - 27
MRG	Minority Rights Group International	Page - 27
NGO	Non-Governmental Organization	Page - 31
ZARRA	Zainab Alert, Response and Recovery Agency	Page - 32
FBR	Federal Board of Revenue	Page - 36
SBP	State Bank of Pakistan	Page - 36
ATM	Automated Teller Machine	Page - 36
DRF	Digital Rights Foundation	Page - 37
ISPR	Inter-Services Public Relations	Page - 42
CAA	Civil Aviation Authority	Page - 42
PTV	Pakistan Television	Page - 42
MOITT	Ministry of Information Technology and Telecommunication	
GPS	Global Positioning System	Page - 43
FoE	Freedom of Expression	Page - 45
UNSR	United Nations Special Rapporteur	Page - 45
PUBG	PlayerUnknown's Battlegrounds	Page - 50
AWP	Awami Workers Party	Page - 51
RTI	Right to Information	Page - 51
MMfD	Media Matters for Democracy	Page - 51
IHC	Islamabad High Court	Page - 51
VPN	Virtual Private Network	Page - 52
FIR	First Information Report	Page - 53
CCTV	Closed-Circuit Television	Page - 54
PFUJ	Pakistan Federal Union of Journalists	Page - 54
PEMRA	Pakistan Electronic Media Regulatory Authority	Page - 54
RUBOC	Removal and Blocking of Unlawful Online Content	Page - 55
ISP	Internet Service Provider	Page - 56
ISPAK	Internet Service Providers of Pakistan	Page - 56
PPC	Pakistan Penal Code	Page - 58
OTT	Over the Top TV	Page - 59
FN	Freedom Network	Page - 59
PAF	Pakistan Air Force	Page - 63
LoC	Line of Control	Page - 63
AFP	Associated Press of Pakistan	Page - 63
ICAO	International Civil Aviation Organisation	Page - 66

LIST OF ACRONYMS

PCAA	Pakistan Civil Aviation Authority	Page - 66
BJP	Bharatiya Janata Party	Page - 69
RTOB	Realtime online branches	Page - 72
POS	Point of Sale	Page - 72
NPSS	National Payment Systems Strategy	Page - 72
AMA	Asaan Mobile Account	Page - 74
TPSP	Third-Party Service Provider	Page - 75
VRG	Virtual Remittance Gateway	Page - 75
DBL	Digital Bridge	Page - 75
PFA	Pakistan Fintech Association	Page - 75
NPC	Naya Pakistan Certificates	Page - 76
API	Application Programming Interface	Page - 76
EMI	Electronic Money Institution	Page - 76
UPI	Unified Payments Interface	Page - 76
NIFT	National Institutional Facilitation Technologies	Page - 76
SECP	Securities and Exchange Commission of Pakistan	Page - 77
NFIS	National Financial Inclusion Strategy	Page - 77
BB	Branchless Banking	Page - 77
USSD	Unstructured Supplementary Service Data	Page - 77
ICF	Innovation Challenge Facility	Page - 77
NFLP	National Financial Literacy Program	Page - 77
MPG	Micropayment Gateway	Page - 77
MENA	Middle East and North Africa	Page - 78
PSO/PSP	Payment System Operator/Provider	Page - 78
SME	Small and Medium Enterprises	Page - 78
PASHA	Pakistan Software Houses Association	Page - 81
B2C	Business to Customer	Page - 82
C2B	Customer to Business	Page - 82
APPS	Avanza Premier Payment Services Private Limited	Page - 82
COD	Cash on Delivery	Page - 84
RCCI	Rawalpindi Chamber of Commerce and Industry	Page - 84
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