

Enabling Environment Snapshot

Pakistan

September 2025



Context

The enabling environment in Pakistan continues to present persistent challenges alongside limited but notable areas of resilience across its political, economic, and civil society spheres. Politically, uncertainty and polarisation remain defining features, with ongoing disputes over governance and electoral reforms shaping the broader democratic space. Mediation among political stakeholders continues, but the government's reliance on regulatory controls, particularly on digital platforms, public expression, and organised gatherings has intensified concerns regarding freedoms of expression, association, and peaceful assembly.

Civil society actors continue to navigate a restrictive operating environment marked by bureaucratic hurdles, scrutiny of funding sources, and administrative delays. These challenges complicate the smooth functioning of organisations, yet civil society remains engaged in critical areas including advocacy on governance reforms, humanitarian response, rights-based initiatives, and development programming. Freedom of speech and independent media face ongoing constraints, with instances of censorship and monitoring of online platforms contributing to a climate of self-censorship among journalists and activists.

Despite these persistent difficulties, pockets of resilience remain visible. Civil society and professional networks have sustained dialogue around civic rights, labour issues, and gender equality, while youth and women's engagement in local civic initiatives signal an enduring demand for inclusion. Incremental openings in policy conversations on climate adaptation and social protection offer opportunities for constructive participation. The current period, though characterised by restrictions and political tensions, underscores the continued importance of safeguarding civic freedoms, easing regulatory pressures, and recognising the role of civil society in fostering democratic accountability and inclusive development.

1. Respect and protection of fundamental freedoms

During the period August 2023 to September 2025, fundamental freedoms in Pakistan continued to face acute pressures, with several high-profile incidents underscoring threats to press freedom, privacy, and protection from enforced disappearance. In mid-August 2025, four senior women journalists from the National Press Club were named in a First Investigation Report under the Prevention of Electronic Crimes Act (PECA) after private messages in a WhatsApp group were cited in a complaint. The Pakistan Federal Union of Journalists and international media bodies condemned the move as an attempt to intimidate and silence reporters, highlighting how PECA is repeatedly used to target journalists for professional and private speech. Although the complaint was filed by the disgruntled ex-husband of one of the journalists and is therefore not necessarily political in nature, it still highlights the ease of abusing PECA to intimidate journalists.

Closely linked was the suspicious death of Khawar Hussain, a Karachi-based reporter found shot in his vehicle on 16 August. The killing prompted public outrage and demands from media bodies for an independent probe. Even though the provincial fact-finding panel concluded the case was a suicide, many journalists and media watchdogs have expressed doubts about the credibility and independence of the investigation. In Pakistan, where journalists have a long history of facing intimidation, mysterious disappearances, and staged "accidents," official determinations of suicide are often met with scepticism, especially when the deceased had recently reported on sensitive political or security issues. Thus, whether or not Khawar Hussain's death was indeed self-inflicted, the lack of transparency and trust in investigative processes makes journalists fear that such cases may be conveniently labelled as suicide to mask potential foul play. Other documented actions against journalists included FIRs and raids in August, illustrating how law-enforcement tools and criminal complaints are used to harass media actors and discourage critical reporting. These cases thus intensified fears among



journalists about safety and impunity, and highlight the chilling effect such incidents have on investigative reporting.

Beyond media repression, human-rights monitors continued to record a large number of enforced disappearances and extrajudicial killings, particularly in Balochistan. Provincial and Baloch rights groups reported hundreds of disappearance cases in August, reinforcing longstanding concerns about enforced disappearances, lack of independent investigations, and limited redress for victims' families — a pattern that gravely undermines basic protections and civic confidence. In many documented cases, enforced disappearances in Balochistan are directly or indirectly linked to civil society engagement, activism, and dissent against state policies. Human rights monitors, including the Human Rights Commission of Pakistan (HRCP), Amnesty International, and the International Commission of Jurists (ICJ), consistently report that those targeted often include students, journalists, lawyers, and members of rights organisations advocating for accountability in cases of missing persons, extrajudicial killings, and resource exploitation. Individuals associated with peaceful protests such as the Baloch Yakjehti Committee (BYC) led by Dr. Mahrang Baloch, have faced intimidation, detention, and surveillance. These actions point to a broader pattern where civil society activity, especially when it challenges the security narrative or demands transparency, is treated as subversive rather than legitimate democratic expression.

To understand this, one must see the Balochistan crisis as rooted in long-standing political alienation and militarisation. The province, despite being resource-rich, has historically experienced economic neglect, limited representation in federal decision-making, and heavy security presence due to separatist insurgencies.

On 31 August 2025, President Asif Ali Zardari signed the Anti-Terrorism (Amendment) Bill, 2025 into law, restoring powers for security and law enforcement agencies to place suspects in preventive detention for up to three months. Officials justified the measure as necessary for counter-terrorism, with a three-year sunset clause and judicial oversight. However, civil society observers warned that the vague criteria for detention ("credible information or reasonable suspicion") could be misused against activists, journalists, or community organisers, thereby intensifying a climate of fear and legal uncertainty. This development reflects how the legal framework continues to expand state powers in ways that risk shrinking civic space and undermining the enabling environment for CSOs.

A prominent case occurred on 5 August 2025, when authorities arrested more than 200 PTI activists during rallies across major cities, including Lahore and Karachi, to mark the second anniversary of Imran Khan's imprisonment. Public gatherings had been pre-emptively banned, and police detentions underscored the state's reliance on restrictions instead of dialogue to manage political dissent.

At the judicial level, the <u>Lahore Anti-Terrorism Court (ATC)</u> on 11 August 2025 acquitted senior PTI leader Shah Mahmood Qureshi in two 9 May riot cases but simultaneously sentenced several other party figures, including Dr. Yasmin Rashid and Omar Sarfraz Cheema, to 10 years' imprisonment. While the acquittal reflected some degree of judicial review, the sweeping convictions highlighted the continuing use of courts as arenas of political contestation, raising concerns about impartiality and the fairness of trials

Collectively, these cases show a worrying pattern. Legal instruments (notably PECA), criminal complaints and investigative raids, unexplained deaths of journalists, and continuing enforced disappearances together constrict the space for free expression, investigative journalism, and civic activism. The combined effect is a heightened climate of fear and self-censorship that undermines the constitutional promise of fundamental freedoms. The net effect has been heightened operational uncertainty, incentivising risk-averse behaviour and constraining the ability of many organisations to sustain public advocacy and community services.



2. Supportive legal framework for the work of civil society actors

At the provincial level, Punjab authorities moved to tighten registration enforcement: the <u>Punjab Charity Commission issued deadlines and undertook inspections of NGOs</u> across the province, reporting administrative action against dozens of organisations and signalling that groups failing to complete registration could face suspension or bans. In fact, administrative action was taken against 98 organisations found violating regulations, while 29 were suspended and their registrations cancelled. This enforcement drive, framed as a measure to regulate unregistered welfare bodies, increased compliance burdens for civil society actors already facing strained resources and created the immediate risk of programme interruptions.

3. Accessible and sustainable resources

Pakistan's social sector faced renewed strain from global aid cuts. Financial and operational pressures have compounded legal constraints. International funding reductions and shifting donor priorities have pushed many organisations to diversify funding sources and rely more on diaspora and local support, a shift that, together with heightened registration enforcement, risks narrowing the fiscal space for rights-based programming and slows project implementation.

These pressures have had a disproportionate impact on smaller, advocacy-oriented organisations. With less flexibility to absorb shocks, such organisations are pushed further into project fragmentation, short-term planning, and reliance on inconsistent funding streams. The decline in predictable funding undermines long-term planning and weakens capacity for rights-based advocacy, or systemic interventions.

Meanwhile, some international pooled and emergency funding mechanisms have been tapped to support crisis responses, especially in disaster-affected areas. For instance, during the month of August the UN released <u>USD 600,000 from a regional emergency pool to support Pakistan's monsoon and flood response.</u> However, such injections are largely earmarked for humanitarian response and are not geared toward sustaining the core advocacy and institutional functions of civil society.

Overall, this period underscores how deeply external funding shifts can destabilise civil society's resource base. Organisations are compelled to shift more resources into survival mode, reducing capacities for long-term, systemic, rights-based work and making the sector more vulnerable to external shocks.

4. State openness and responsiveness

The relationship between the state and civil society in Pakistan continues to be marked by restricted openness and limited responsiveness, with engagement remaining largely one-sided and reactive. Despite maintaining democratic institutions such as elections and legislatures, real decision-making remains concentrated in the executive and security apparatus. Civil society actors, journalists, and opposition groups face systemic barriers in exercising rights to assembly, protest, and expression. The state often frames dissent through a security lens, using laws like the Peaceful Assembly and Public Order Act (2024) or Anti-Terrorism Act amendments to limit participation rather than enable it. This approach has institutionalised mistrust between citizens and the state, eroding belief in meaningful dialogue and reinforcing a coercive model of governance.

Moreover, controversy surrounding the <u>Commonwealth Observer Group's (COG) report</u> on the February 2024 general elections deepened an already visible trust deficit between civic



actors and oversight institutions such as the Election Commission of Pakistan (ECP). Media outlets reported that the document, initially withheld, was leaked in mid-September and allegedly highlighted systemic irregularities, procedural violations, and institutional bias in the conduct of elections. Opposition parties, particularly PTI, seized on the report as evidence of manipulated results, citing mismatches between Form-45 and Form-46 and alleging deliberate targeting of party leaders. Government authorities, however, remained silent on the authenticity of the leak, fueling perceptions that the report had been deliberately suppressed. For civil society networks engaged in monitoring elections, governance, and democratic rights. the incident underscored a widening gap between state institutions and political opposition, while also reinforcing civil society concerns about transparency, electoral justice, and the credibility of democratic processes. Instead of engaging CSOs and political parties to address documented irregularities, institutions chose silence, perpetuating the sense that accountability mechanisms serve state interests, not public ones. This non-responsiveness discourages collaboration and leaves civic actors working in an environment of suspicion and limited access. In essence, the suppression of the COG report did not just obscure one election's credibility, it exemplified how non-transparency itself becomes a barrier to participatory governance, isolating civil society from the very processes it seeks to strengthen.

A rare opportunity for civil society engagement is found in ongoing government discussions around social protection, climate resilience, and inclusive development, presenting concrete policy windows where CSOs can leverage their expertise to contribute to evidence-based reforms. Several CSOs are already engaging with relevant ministries and provincial departments to influence the design and implementation of social protection programmes and climate adaptation frameworks.

While a few other positive signals emerged in 2025 such as limited judicial interventions against media bans and increased international scrutiny, organisations like <u>CIVICUS</u> and ICNL monitoring these shifts show they remain superficial. There has been no significant structural reform to ensure transparency, consultation, or accountability in lawmaking or rights protection. Civil society participation in legislative processes continues to be minimal or tokenistic, and most engagement occurs only after restrictive laws are enacted. Overall, the year showed continuity rather than transformation: Pakistan's civic space remains constrained, with state institutions prioritising control and order over democratic responsiveness and citizen inclusion.

Together, these cases show how the state's engagement with civil society actors and opposition voices remains sporadic, coercive, and heavily influenced by political imperatives. Instead of institutionalised mechanisms for accountability and dialogue, Pakistan's civic space in this period was marked by reactive enforcement, legal contestations, and restrictions on political participation.

5. Political Culture and Public Discourses on Civil Society

In Pakistan, the political discourse around civil society during August–September 2025 was shaped by renewed debates on electoral legitimacy and the role of oversight institutions. A central development was the controversy surrounding the COG) report on the February 2024 general elections. While the report revealed significant irregularities in the election, the government remained silent and did not respond to the findings. This episode illustrated how weak responsiveness and defensive state postures erode dialogue and diminish citizens' faith in electoral integrity.

Another high-profile case in early August involved the arrest and judicial remand of Dr. Mubina Cassum Agboatwala, chairperson of the NGO Health-Oriented Preventive Education (HOPE), in connection with alleged child trafficking and illegal adoptions. The case, initiated after a



complaint from the US Consulate General, alleges that the NGO secretly handed over "abandoned babies" to families abroad using forged documents and misrepresented institutional status. Pre-arrest bail was denied, and the charges include serious offences under the Prevention of Trafficking in Persons Act. Civil society observers warned that while trafficking must be addressed, cases like this also risk fuelling narratives of distrust against all welfare-oriented NGOs, particularly when legal safeguards are unclear or weak.

6. Access to a secure digital environment

Digital regulation and law-enforcement actions continued to shape civic space. More than 1,200 cases have been filed under Pakistan's cybercrimes law (PECA), including several targeting journalists, highlighting how broadly-worded provisions are being applied to stifle dissent and regulate online speech. In parallel, new rules introduced for the National Cyber Crime Investigation Agency (NCCIA) outline its expanded structure, authority, and investigatory powers. While authorities frame these measures as necessary for combating online crime and misinformation, civil society actors fear they further entrench state control over digital spaces and create new vulnerabilities for activists and smaller organisations that depend on online platforms. The recurring cycle of restrictive orders, arrests, and judicial interventions has fostered a climate of legal uncertainty, where even limited checks by higher courts do not fully mitigate the chilling effect on civic expression.

More recently, Amnesty International reported that Pakistan is conducting large-scale surveillance of citizens through systems like phone-tapping (Lawful Intercept Management System, LIMS) and internet filtering/firewall systems (Web Monitoring System, WMS 2.0). These surveillance tools are seen as being used to suppress dissent and restrict free speech, particularly after political unrest tied to the former Prime Minister's arrest and ongoing protests.

At the same time, there have been individual instances of judicial intervention to protect digital rights and safeguard online engagement. On August 16, the Balochistan High Court (BHC) <u>directed</u> the provincial government to reconsider its province-wide suspension of mobile and data services and ordered restoration in areas not under specific security threat. Earlier, on 13 August, the BHC had also <u>asked</u> both federal and provincial governments to file replies regarding the legality and justification for the shutdown.

Challenges and Opportunities

In the coming months, the environment for civil society organizations (CSOs) in Pakistan is expected to remain constrained by political uncertainty, enhanced security controls, and regulatory pressures, yet opportunities for engagement and advocacy continue to exist.

- 1. CSOs are likely to face heightened scrutiny under regulatory frameworks, with increasing restrictions on NGO registration and foreign funding. Recent developments, including the arrest of an NGO head in a trafficking case, may trigger tighter oversight and blanket suspicion towards legitimate organisations.
- 2. The expansion of security powers through recent legal amendments, coupled with a sharp rise in cybercrime cases under PECA, underscores a growing trend of securitisation. These measures not only criminalise dissent but also foster an environment of surveillance and intimidation for activists, journalists, and rights groups.
- 3. The broader political landscape, marked by allegations of electoral irregularities, prolonged detentions, and shrinking media freedoms, continues to erode public trust and narrow the space for civic dialogue and peaceful assembly.

In terms of opportunities:



- 1. Despite restrictions, judicial interventions against arbitrary internet shutdowns and digital bans provide limited but meaningful safeguards for freedom of expression and access to information.
- 2. Ongoing government discussions around social protection, climate resilience, and inclusive development present policy windows where CSOs can leverage their expertise to contribute to evidence-based reforms.
- 3. Expanding use of digital platforms, combined with local philanthropy and diaspora support, offers CSOs alternative avenues to mobilise communities, particularly youth and marginalised groups, and sustain advocacy despite financial and political pressures.

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