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SUPPORTING
AN ENABLING ENVIRONMENT
FOR CIVIL SOCIETY

Country Focus Report

PAKISTAN

July 2025

Introduction to the Enabling Environment

An Enabling Environment is the combination of laws, rules, and social attitudes that support and promote the work of civil society. Within such an environment, civil society can engage in political and public life without fear of reprisals, openly express its views, and actively participate in shaping its context. This includes a supportive legal and regulatory framework, ensuring access to information and resources that are sustainable and flexible, allowing organisations to pursue their goals unhindered in safe physical and digital spaces. In an enabling environment, the state demonstrates openness and responsiveness in governance, promoting transparency, accountability, and inclusive decision-making.

To capture the state of the Enabling Environment **in Pakistan**, this report assesses the civic landscape across the following six principles:

In this Country Focus Report, each enabling principle is assessed with a quantitative score and is complemented by a narrative analysis and recommendations. The purpose of this report is not to rank Pakistan against other nations, but to measure the enabling environment for its civil society across these six principles, discerning dimensions of strength and those requiring attention within the specific national context.

Six key enabling principles:

1. Respect and protection of fundamental freedoms
2. Supportive legal and regulatory framework
3. Accessible and sustainable resources
4. Open and responsive State
5. Supportive public culture and discourses on civil society
6. Access to a secure digital environment

The findings presented here are grounded in the insights and diverse perspectives of civil society actors from across Pakistan, who came together in a dedicated panel to discuss and evaluate the state of the Enabling Environment. Their collective input, reflecting deep, localised expertise, enriches the report with a grounded, participatory assessment. This primary input is further supported by secondary sources of information, which provide additional context and strengthen the analysis.

.A) Introduction

The enabling environment for civil society in Pakistan during the reporting period has been defined by the intersecting pressures of a volatile political landscape and an economy in a tentative stage of recovery from the 2022–23 financial crisis, which was characterised by soaring inflation, external debt stress, and austerity measures under the IMF stabilisation programme. While key macroeconomic indicators have improved during this period, these gains have not yet translated into widespread microeconomic stability, with fiscal constraints continuing to exert pressure on citizens and civil society. The aftermath of a contentious February 2024 general election has deepened political polarisation, directly impacting how the state interacts with its citizens and the organisations that represent them. This has created systemic challenges that cut across all six principles of the enabling environment.

The heightened political tensions have led to a direct erosion of fundamental civic freedoms, as the state increasingly resorts to pre-emptive bans on public gatherings and censorship. This has been facilitated by a restrictive interpretation of the legal framework, which has been used not to enable civil society, but to control it through opaque vetting processes and administrative hurdles. The economic situation has compounded these challenges, diminishing already limited domestic funding opportunities while state control over foreign funding threatens the sustainability of the entire sector.

Consequently, the state has become less open and responsive, sidelining genuine participation in favour of selective engagement. This approach has fuelled a negative public discourse that often portrays critical CSOs as threats to the national interest, while the state's efforts to manage dissent have led to an expansion of control over the digital environment through internet shutdowns and increased surveillance.

Against this backdrop, this report details how these overlapping pressures have systematically constrained the enabling environment in Pakistan.

B) Assessment of the Enabling Environment

The overall assessment of the enabling environment for civil society in Pakistan is overwhelmingly negative, with five of the six core principles scoring firmly in the "Disabling" range. The findings reveal a systematic and multifaceted constriction of civic space, driven by a state apparatus that prioritises control over enablement. While civil society remains resilient, it operates under significant and increasing pressure. The following section provides a detailed analysis of each principle, synthesising the consensus scores and justifications provided by the expert panel.

Principle 1: Respect and protection of fundamental freedoms

Score: 2

While Pakistan's Constitution provides guarantees for the rights to association, peaceful assembly and expression, their practical implementation has been consistently inconsistent, often constrained by legal ambiguities, bureaucratic impediments, and direct political interference. Over the past year, the civic space in Pakistan has significantly deteriorated, with alarming trends indicating systematic repression across all three dimensions, leading to an overall assessment of "Disabling."

1.1 | Freedom of Association

Despite Article 17 of Pakistan's Constitution guaranteeing freedom of association, implementation remains inconsistent and often undermined by political and bureaucratic interventions. The Ministry of Interior continues to enforce a rigorous registration and security vetting process, established in 2015, which imposes substantial administrative burdens and causes significant delays. In September 2024, the government announced it would speed up the process and decide the fate of over a dozen international non-governmental organisations (INGOs). While the final status for most of these organisations remains unclear, the Ministry of Interior has already ordered two - Tobacco-Free Kids and Vital Strategies - to halt their operations.

The expert panel reported that in Azad Jammu and Kashmir (AJK), the Social Welfare Department introduced a requirement that all community-based organisations must obtain pre-clearance from the Home Department prior to any project launch. This measure is

expected to delay the approval of CSO projects. In Gilgit Baltistan a moratorium has been placed on the registration of CBOs, with no clear end date. In Balochistan, civil society organisations reported increased scrutiny during registration and No Objection Certificate (NOC) processes. While Punjab and Sindh continue to allow CSO registration in principle, the expert panel indicated delays in NOC issuance in all parts of the country, with law enforcement agencies frequently intervening in the approval process.

Additional reporting by CIVICUS and ICNL noted that Pakistan's legal environment remains classified as "repressed", especially due to the ambiguity of recent charity registration laws that can be leveraged to exclude dissenting voices. A June 2025 statement by Amnesty International noted that authorities weaponised laws relating to criminal defamation, sedition, and 'cyber terrorism' to muzzle dissent, highlighting the arbitrary application of legal tools to silence activism. These examples collectively illustrate an environment where legal recognition is technically available but substantially hindered in practice.

1.2 | Freedom of Peaceful Assembly

Article 16 of the Constitution of Pakistan protects peaceful assembly, but this right is repeatedly curtailed through the use of Section 144 of Pakistan's Penal Code, which allows local administrations to ban gatherings without judicial oversight. The use of Section 144 to consistently undermine the right to gather and protest has become a routine administrative mechanism to disrupt civil society events, particularly in urban areas.

During the reporting period, several verified incidents highlighted these restrictions. In October 2024, the Punjab government invoked Section 144 to preempt a sit-in by the Pakistan Tehreek-e-Insaf (PTI), resulting in the arrest of hundreds of activists and disruption of student-led marches in Lahore. Similarly, in November 2024, authorities in Islamabad imposed blanket restrictions on protests near government buildings ahead of anti-inflation demonstrations, citing vague security concerns.

In Balochistan, the provincial government continues to prohibit any form of public gathering by imposing Section 144 as a security measure. This restrictive environment serves as a backdrop to the ongoing and high-profile campaign led by Baloch activist Dr. Mahrang Baloch and her group, the Baloch Yakjehti Committee (BYC), against longstanding issues of enforced disappearances and extrajudicial killings. The movement has consistently faced a harsh state response, which escalated in March 2025 when authorities arrested Dr. Mahrang Baloch and several other activists during a peaceful sit-in. The government has also sought to curtail the movement's activities through legal and administrative means, including placing leaders on watchlists to restrict their movement and levelling accusations that brand the peaceful movement as a proxy for militants.

In a May 2024 statement, Amnesty International called on the government to release all peaceful protesters and end practices impeding the right to protest, including blanket bans through the imposition of Section 144, highlighting a pattern of repression in Pakistan. These documented incidents reflect a consistent trend of arbitrary restrictions, disproportionate enforcement, and denial of the right to peaceful assembly.

Authorities also used digital controls to disrupt protests; in November 2024, the government partially suspended mobile and internet services in Islamabad, Khyber Pakhtunkhwa and Punjab ahead of a planned nationwide protest by the PTI.

1.3 | Freedom of Expression

Despite constitutional guarantees under Article 19, the operational environment for freedom of expression has deteriorated significantly during the reporting period. Legal frameworks, regulatory practices, and targeted enforcement have created a chilling effect on media, civil society, and online expression.

The cornerstone of this repression is the Prevention of Electronic Crimes Act (PECA), 2016, which was significantly altered by amendments hastily passed in January 2025 without meaningful consultation with media or civil society stakeholders. The amendment introduced a vague new offence under Section 26A, criminalising the dissemination of "false and fake information" with severe penalties of up to three years in prison and a fine of up to two million rupees. The law also established new regulatory bodies, such as the Social Media Protection and Regulatory Authority (SMPRA), with broad powers to block content and platforms without independent judicial oversight.

The law has been actively weaponised to silence critical voices. The Federal Investigation Agency (FIA) has used PECA to target journalists, activists, and political opponents. For instance, journalist Asad Ali Toor was arrested after responding to a summons for questioning in February 2024 for an alleged "malicious campaign" against state institutions. Many other journalists also face charges under the act for their online expression.

Consistent monitoring by the Freedom Network, a reliable national voice for journalists' rights, confirms the severity of the situation. In its report covering May 2024 to April 2025, the organisation concluded that Pakistani media faces an "existential threat" amid an "increased restrictive environment". The report documented that at least five journalists were killed and 82 others were threatened during this period, with Khyber Pakhtunkhwa emerging as the most dangerous region. This pattern of intimidation is reinforced by legal action. The Freedom Network's December 2024 monthly monitor, for instance, documented that the FIA had initiated action against over 150 individuals, including journalists and vloggers, for allegedly promoting false narratives against state institutions online. The organisation's detailed tracking of legal cases, threats and censorship paints a grim picture of the environment for journalists in the country.

Beyond the digital realm, pressure on media remains intense. CIVICUS and many other international monitors have voiced concern over increased assault on dissenting voices. Pakistan dropped two places in the 2024 World Press Freedom Index published by Reporters Without Borders (RSF). It now ranks 152 out of 180 countries, compared to its standing at 150 in the 2023 index. In its country profile, RSF said that Pakistan has “oscillated between civil society’s quest for greater press freedom and a political reality in which the political-military elite retains broad control over the media”.

Principle 2: Supportive legal and regulatory framework

Score: 2.3

In Pakistan, the legal framework governing CSOs is complex, often overlapping, and frequently restrictive. While the Constitution guarantees freedom of association, recent amendments and policies have tightened controls, particularly concerning foreign funding and government oversight. This has led to bureaucratic hurdles, lack of transparency, and concerns regarding the autonomy and sustainability of civil society, resulting in varied but generally challenging conditions across its dimensions.

2.1 | Registration

A formal legal framework exists for CSOs to register and operate, but significant barriers persist in implementation. The panellists shared several examples of firsthand experience, including prolonged delays in the renewal of registration, which can leave organisations in a state of legal limbo. While many CSOs are able to register, those working on rights-based issues or in politically sensitive regions face additional scrutiny, bureaucratic delays and, at times, denial of registration without explanation.

In 2024, registration procedures across Pakistan were influenced by provincial policies and federal-level oversight. The Societies Registration (Amendment) Act, 2024 was enacted, amending the Societies Registration Act XXI of 1860, extending mandatory registration requirements to include previously exempt entities, such as informal groups and religious seminaries. The revised law has blurred distinctions between NGOs and religious bodies, raising reputational and legal risks for development-focused organisations. Furthermore, scrutiny under Financial Action Task Force (FATF)-related compliance frameworks has increased. Overlapping policies and compliance requirements have overburdened the civil society sector, resulting in the deregistration of several local CSOs.

Regional variations further highlight the inconsistent application of these laws. First-hand accounts from expert panellists revealed that several human rights and women-led CSOs have faced unexplained registration denials in Khyber Pakhtunkhwa. Similarly, rights-based organisations in Gilgit-Baltistan (GB) and Azad Jammu and Kashmir (AJK) have reported heightened scrutiny and ambiguous compliance conditions that hinder their work.

On a more positive note, a multi-stakeholder consultation held by Community World Service Asia in May 2025 with the Punjab Social Welfare Department aimed to harmonise and simplify NGO registration procedures. Officials acknowledged that arbitrary delays and poor inter-departmental coordination remain problems, and expressed commitment to greater procedural clarity. Overall, while the legal framework for registration is functional in many areas, the practical experience of CSOs—especially those engaged in advocacy or serving marginalised communities—remains fraught with procedural hurdles and discretionary control.

2.2 | Operational Environment

The operational environment for civil society has narrowed significantly, where the legal and administrative framework imposes substantial limitations on CSOs in setting objectives, conducting activities, and accessing funding. Although CSOs are not banned by law, practical, regulatory, and security-related obstacles considerably hinder their operational autonomy.

The panelists shared several examples of first-hand experience of a disabling operational environment, including a very restrictive process for issuance of No Objection Certificates (NOCs), which are required to conduct specific projects and activities, thereby hindering operational work, and challenges with opening and operating bank accounts. These testimonies underscore the growing disconnect between the legal framework and the operational realities faced by CSOs across the country.

In late 2024, the Lahore High Court struck down an overly restrictive funding registration policy imposed by the Economic Affairs Division in 2022, which empowered intelligence agencies and district administration to delay or deny registration on security grounds. In Balochistan, the Civil Society Coordination Cell (CSCC), a cell within the Home Department established in 2023, now mandates CSOs to report quarterly activity, undergo financial scrutiny, and re-validate memorandums of understanding (MoUs) annually. The panellists

reported that these requirements have led to suspension of registrations or operational licences in several cases during the reporting period.

In terrorism-affected regions, operational barriers stem not only from state interference but also from security threats. ACAPS highlighted CSO staff safety concerns in KP and Balochistan due to violence by non-state armed groups and disruptions caused by ongoing military operations. Checkpoints, curfews, and surveillance reduce the ability of field teams to access communities or deliver services consistently. The V-Dem Institute's 2024 index marks a drop in Pakistan's CSO operational environment, indicating a declining trend over the past two years. This quantitative evidence reinforces qualitative findings of an increasingly disabling operational context.

2.3 | Protection from Interference

There are limited legal safeguards available to protect CSOs in Pakistan from arbitrary interference, dissolution, and regulatory overreach. While formal recognition of CSOs exists, vague laws, burdensome inspection regimes and selective enforcement enable authorities to interfere extensively in the affairs of CSOs, particularly those engaged in advocacy, rights-based programming, or critical commentary.

While constitutional provisions such as Article 17 guarantee freedom of association, the legal framework offers minimal protection against undue interference from both state and non-state actors. Authorities frequently cite national security, foreign influence, or public order concerns to justify actions against CSOs, but critics and practitioners argue that such measures are disproportionately applied to restrict civic space and dissent. In a significant act of interference, the government used the broad provisions of the Anti-Terrorism Act to ban the Pashtun Tahaffuz Movement (PTM) in October 2024, a prominent rights-based movement that has mobilised peacefully against human rights violations.

The Civil Society Coordination Cell (CSCC) in Balochistan and the federal-level security vetting mechanisms, expanded in 2024, require excessive documentation, periodic audits, and repeated justifications for CSO operations—even for routine activities. These procedures are inconsistently applied and often perceived by CSOs as intrusive and punitive. According to the expert panel, while these procedures may not always lead to formal dissolution, they are used to suspend operational licences or freeze bank accounts, creating a de-facto closure that effectively silences the organisation.

According to the V-Dem Institute's 2024 Protection from Interference Index, Pakistan scored 0.18 out of 1.0, indicating a high vulnerability to interference.

Principle 3: Accessible and sustainable resources

Score: 2.0

In Pakistan, civil society organisations (CSOs) face significant challenges in accessing diverse and sustainable resources. Financial sustainability remains a key concern, particularly for grassroots organisations heavily reliant on international donor funding. Domestic funding sources are limited, and capacity-building opportunities are insufficient and unevenly distributed. This environment often undermines the resilience and independence of CSOs, especially those working on sensitive or marginalised issues.

3.1 | Accessibility

The civil society actors in Pakistan face persistent barriers to accessing financial resources, particularly from international donors. While funding sources exist, they are limited in scope, politically sensitive, and subject to heavy regulation and unpredictable delays.

Most CSOs—especially those working in rights-based advocacy— are highly dependent on international funding, which is tightly regulated. Donor funding is often restricted to specific activities, and access is hindered by opaque approval processes, limited outreach mechanisms, and insufficient capacity support. Domestic philanthropic support and CSR contributions remain fragmented and small-scale, with limited presence outside urban centres.

The Ministry of Interior continue to implement the 2015 policy, defining vetting process for all foreign-funded organisations, mandating detailed background checks and prior clearance for disbursements. Though officially presented as a transparency mechanism, the process has resulted in long delays, unpredictable approvals, and increased administrative burden for CSOs, thereby limiting access to foreign funding.

In September 2024, the Lahore High Court struck down the federal policy that required security clearance and MoUs for NGO foreign funding, citing a lack of legislative authority. Although this was a legal win for CSOs, the implementation and interpretation of this ruling remain inconsistent, and many organisations report continued vetting-related delays and uncertainty.

Additionally, the 2024 CSO survey by the Women's Peace and Humanitarian Fund revealed that smaller, grassroots, and women-led organisations face disproportionate challenges in securing stable funding due to complex compliance structures, lack of core funding, and insufficient administrative support.

Panellists noted that CSOs often lack timely information about funding opportunities and face inconsistent vetting procedures across provinces. In Khyber Pakhtunkhwa and Balochistan, international funding access is particularly difficult. CSOs in these regions reported lengthy documentation requirements and informal approval systems, creating further delays and uncertainty.

This consistent pattern—regulatory opacity, political sensitivity, regional disparities, donor rigidity, and delayed disbursements—constitute a disabling environment, as access to funding remains constrained, unpredictable, and politically influenced.

3.2 | Effectiveness

Donor priorities, funding structures, and compliance demands restrict CSOs from using available resources effectively or strategically. A common constraint reported by Pakistani CSOs is donor rigidity in thematic focus and budgetary frameworks, particularly in competitive grant cycles. For example, the Notice of Funding Opportunity (NOFO) for grants to end Child, Early, and Forced Marriage (CEFM) issued by Stengthening Participatory Organisations (SPO) in 2024 outlines fixed-amount awards with narrow thematic focus and strict budget ceilings. Such structures limit the ability of local CSOs to align programme delivery with evolving local needs, especially in rapidly changing humanitarian or protection contexts. Furthermore, expert panellists noted that donor-CSO relationships are often hierarchical, with international partners setting priorities and local organisations relegated to an implementing role, with little influence on strategic direction. This top-down approach stifles the ability of CSOs to adapt projects to local contexts and reduces ownership.

Moreover, delays in foreign funding disbursement and donor-imposed conditionalities hinder project start-up timelines. A 2024 study Analyzing Pakistan's Foreign Aid Inflows And Its Outcomes by the Pakistan Institute of Development Economics (PIDE) concluded that donor aid inflows, particularly from major bilateral donors, are often delayed, over-regulated, and structured in ways that reduce development impact. The NCHR Annual Report 2024 echoed these findings, noting that smaller and community-based CSOs face disproportionate administrative burdens such as detailed audits, reporting fatigue, and compliance documentation beyond their technical or staffing capacities. These conditions reduce programme agility and effectiveness, especially in rural and underserved areas.

CSOs operating in terrorism-affected regions, including Balochistan and KP, face additional barriers. The IOM Pakistan Crisis Response Plan (2023–2025) found that bureaucratic red tape, informal clearance systems, and localised security dynamics prevent timely implementation of even approved and funded projects, creating disparities in operational effectiveness. Multiple Pakistan-focused reviews in 2024 found that local and grassroots partners reported heavy administrative and reporting burdens — including narrowly prescribed logframes, strict indicator-based M&E, and complex procurement/permit processes. These constraints as well as the limited access to flexible funding reduced their ability to adapt activities to evolving local needs during post-flood recovery and early recovery programming.

These compounding issues—donor rigidity, delayed disbursements, overregulation, and localised constraints—collectively constitute a disabling environment, as CSOs in Pakistan remain unable to fully leverage resources to pursue sustained and responsive change.

3.3 | Sustainability

Civil society organisations (CSOs) are operational but face systemic obstacles to long-term financial sustainability. Across Pakistan, the vast majority of CSOs—particularly those focused on rights-based work—continue to rely heavily on project-specific and donor-dependent funding cycles. A critical issue, as stressed in the WPHF Learning Hub's Annual Report, is the severe lack of unrestricted/core funding, which prevents organisations from investing in staff development, digital systems, or long-term planning. The 2024 WPHF Global Learning Hub survey report flagged persistent funding volatility and institutional fragility among smaller CSOs.

At the national level, macroeconomic instability is also compounding funding sustainability challenges. According to the Finance Division's June 2025 Fiscal Risk Statement, inflation, debt servicing, inefficient state-owned enterprises (SOEs) and climate disasters risk lower revenue generation and GDP growth. Reduced fiscal space will ultimately result in curtailed development spending, indirectly further squeezing space for civil society engagement. These constraints are mirrored in the UNICEF Pakistan Annual Report 2024, which documents how donor-backed partnerships with CSOs remain vulnerable to donor shifts and external shocks.

Additionally, organisations operating in terrorism-affected regions including KP, Balochistan, and parts of AJK, report greater sustainability barriers due to security-related bureaucratic vetting, disbursement delays, and travel restrictions. The IOM Pakistan Crisis Response Plan (2023–2025) documents how these bottlenecks affect consistent delivery of services and undermine investment in longer-term programming.

Together with the increased scrutiny under FATF-related compliance frameworks resulting in the deregistration of several local CSOs, these events have heightened a perception of

institutional fragility and reduced access to operational liquidity for grassroots actors. Despite some pilot efforts at diversification, the environment remains defined by short-termism, donor dependency, fragile local philanthropy, and economic volatility, all of which compromise CSO sustainability.

Principle 4: Open and responsive State

Score: 2.8

In Pakistan, the relationship between the state and civil society is characterised by cautious engagement and limited responsiveness. While the government acknowledges civil society's role in development and social welfare, particularly in areas like poverty alleviation and disaster response, consistent and meaningful consultation mechanisms remain underdeveloped. Political instability, bureaucratic inertia, and security concerns frequently restrict state institutions' openness to civil society input, leading to the marginalisation or exclusion from formal decision-making processes for actors working on sensitive issues like human rights or governance reforms. Despite some positive developments in specific sectors, such as environmental and climate policy, overall engagement remains uneven across provinces and sectors, reflecting a challenging environment for open and responsive governance.

4.1 | Transparency

While a legal framework for transparency exists in Pakistan, its implementation is weak. Public access to government information is possible but often characterised by slowness, inconsistency, or arbitrary denials. Key policy documents or budgets may be delayed or released in incomplete formats, and proactive disclosure, though present, is limited in scope. Government officials may show some willingness to provide information but often lack the capacity or clear guidelines to do so effectively.

Pakistan's Right to Information (RTI) regime - comprising the federal and provincial laws such as Punjab RTI law or KP RTI law - remained legally intact, yet its implementation continued to be marred by weak institutional capacity and frequent violations. A 2024 implementation study found that only 17.1% of 127 RTI requests submitted across the country were met with complete information, and just 18% of complaints were resolved—highlighting administrative bottlenecks and a lack of enforcement. This is compounded by prolonged vacancies in key positions within the federal and provincial information commissions, which undermines their ability to function effectively.

The use of broad exemptions, particularly related to national security, is a common tactic to deny information requests. A June 2025 article by *Friday Times* described the entire information commission system as "enable{ing} secrecy over transparency", with commissions routinely failing to enforce disclosure obligations. Structural issues persist in proactive disclosure. CSOs and journalists also reported delays and incomplete releases of key budget and audit documents, undermining efforts to monitor governance.

These trends demonstrate that although a legal framework for transparency exists, it is unevenly applied, subject to bureaucratic discretion, and marked by weak enforcement.

4.2 | Participation

Opportunities for civil society participation in policy-making exist but are often selective and exclusionary. While some formal consultation mechanisms are in place, they are frequently

ad hoc, non-transparent, or limited to CSOs aligned with government priorities. This prevents consistent and meaningful input from a diverse range of civil society actors.

During the reporting period, multiple developments reinforced this exclusionary trend. The Planning Commission's Annual Plan 2024–25 outlined development priorities but provided no evidence of inclusive consultation mechanisms to incorporate civil society perspectives. Similarly, while initiatives such as the Community World Service Asia partnership with the Punjab Social Welfare Department demonstrated that more structured engagement is possible—supporting a number of CSOs through help desks, legal advisory services, and coalition-building—such efforts remained isolated and project-driven rather than systemic.

Expert panellists shared that even where formal consultation spaces exist, practical access was highly constrained. Planned consultations were cancelled or conditioned by administrative hurdles (e.g., NOCs and vetting), while women-led, minority-led and rights-based organisations faced harassment, threats, and funding/participation barriers that effectively sidelined them from policy dialogue — particularly in sensitive domains such as governance, minority rights and environmental policy.

This trend was also evident in national forums. The Pre-COP29 Climate Dialogue, held in October 2024, involved limited civil society representation. While some CSOs were present, the space was dominated by government and donor-linked entities, with minimal inclusion of advocacy-focused or rights-based organisations. Likewise, the Asma Jahangir Conference 2024 provided a rare platform for rights-focused dialogue, with over a hundred speakers including civil society leaders and judges, yet such events remain exceptional and not integrated into policymaking processes.

Regional disparities remain pronounced. In Khyber Pakhtunkhwa, restrictive regulations and bureaucratic clearance requirements continue to limit journalistic and civil society input. In Gilgit-Baltistan and Islamabad, the Human Rights Commission of Pakistan (HRCP) reported that planned consultations were cancelled after hotels demanded prior no-objection certificates from local authorities, highlighting how administrative barriers are used to stifle independent platforms. At the same time, informal civic mobilisation has emerged as an alternative to formal consultation spaces. The Babarloi sit-in in Sindh in April 2025, led by lawyers' associations and local community groups against federal canal projects, demonstrated the capacity of grassroots actors to contest exclusionary policies, even when formal avenues are blocked.

Taken together, these developments show that civil society participation in Pakistan's policymaking processes remains narrow, controlled, and exclusionary. Formal engagement is either tokenistic or limited to government-aligned actors, while meaningful dialogue with rights-based or independent CSOs is consistently avoided. Where participation does occur, it is more often through public mobilisation and protest than through institutionalised, transparent mechanisms of consultation.

4.3 | Accountability

There is a near absence of meaningful mechanisms in Pakistan through which civil society can hold the state accountable for its commitments to engagement, transparency, or consultation. While consultations or engagement forums do occur, there is generally no follow-up, feedback, or appeal process to understand how CSO input is used—or why it is rejected.

The 2024 Bertelsmann Transformation Index explicitly states that “mechanisms for accountability remain limited”, and confirms that civic participation—including through CSOs—is often not met with structured or institutional responses. This applies particularly to state-led consultations on governance, development, or regulatory processes, where civil society feedback is routinely sought for form’s sake but left unacknowledged or is not acted upon.

At the federal level, the security vetting process launched in February 2024 by the Ministry of Interior introduced new documentation and approval requirements for foreign-funded CSOs. However, the process was opaque, with no feedback, no clarification on delays, and no appeal mechanisms for rejected cases. Many CSOs reported either never receiving a response or being unable to follow up due to vague communication channels.

The Freedom House 2025 Report gave Pakistan a civic freedom score of 32/100, classifying it as “partly free.” It noted concerns about civil liberties, including the lack of recourse for civil society actors seeking to engage or question state actions. Likewise, the Transparency International Pakistan (TIP) June 2025 call for reforms emphasised the absence of empowered oversight bodies, recommending stronger Public Accounts Committees and grievance redress systems to address a widening accountability gap.

Regionally, these deficits are compounded by uneven implementation. In Khyber Pakhtunkhwa and Balochistan, the suspension of NGO activities through provincial coordination bodies has occurred without formal explanation or feedback. CSOs denied registration or activity clearance are not informed of the rationale and have no official route to appeal decisions, as noted in the HRCP and DRF local monitoring summaries.

Taken together, these findings confirm that Pakistan lacks functional, responsive, and transparent mechanisms for ensuring accountability to civil society actors.

Principle 5: Supportive public culture and discourses on civil society

Score: 2.3

In Pakistan, public perception of civil society is mixed, shaped by a complex interplay of political, social, and media dynamics. While CSOs play a vital role, scepticism and mistrust are fuelled by political influence, limited transparency, and weak democratic institutions. Media coverage is often limited or biased, hindering social acceptance and engagement. Political polarisation, censorship, and limited civic education further constrain the overall public discourse.

5.1 | Public Discourse and Constructive Dialogue on Civil Society

Public discourse surrounding civil society organisations (CSOs) in Pakistan is shaped by a complex interplay of historical legacies, political narratives, and media framing. While CSOs have played a pivotal role in promoting democratic values, human rights, and service delivery, their legitimacy is frequently contested in public and official narratives. There was a near consensus among expert panelists that public discourse around civil society in Pakistan remains largely dismissive or hostile—particularly toward CSOs working on human rights, governance, or minority issues. Government officials and some media houses frequently use negative rhetoric, often branding critical CSOs as foreign-funded, anti-state, or subversive to delegitimise dissenting voices. Such framing fosters public suspicion and erodes trust, portraying civil society as an extension of external agendas rather than indigenous democratic actors.

The HRW World Report 2025 similarly highlights increasing restrictions on CSOs perceived as critical of the state, including branding them as ‘anti-state’. These attitudes are amplified by politicised media coverage and editorial bias, creating an ecosystem where critical civic voices are delegitimised or ignored.

Multiple panellists cited firsthand experiences of CSOs being excluded from television debates, denied media coverage, or dismissed publicly by political figures. Mainstream media faces increasing pressure to avoid politically sensitive topics, particularly those involving women’s rights or minority protections. State-led financial pressure, such as the withdrawal of advertising from critical outlets, further contributes to a climate of censorship. These actions collectively reinforce the position that civil society actors have "limited or no opportunities to engage in constructive dialogue" and that their perspectives are often delegitimised or silenced.

5.2 | Perception of Civil Society and Civic Engagement

While public scepticism about CSOs persists—especially regarding foreign-funded or rights-focused organisations—there is also growing recognition of civil society’s contributions to humanitarian, educational, and environmental causes.

Expert feedback noted generational and urban-rural divides. In metropolitan areas like Lahore, Islamabad, and Karachi, youth-led advocacy groups and student networks have become increasingly active in digital and local engagement. However, in rural regions, where 61.4% of the population resides, participation is limited by a significant digital divide, social norms, and security constraints. The EU has noted a "general climate of mistrust, particularly vis-a-vis advocacy and HR organisations" which is partly attributed to the fact that accountability and transparency mechanisms for CSOs to self-regulate are underdeveloped.

Meanwhile, civic education remains lagging. The Vision 2025 Executive Summary by the Planning Commission highlights the need for inclusive citizenship and social cohesion, indirectly acknowledging civic education gaps. More broadly, a significant barrier to civic engagement is a deep 'trust deficit', where citizens, particularly marginalised groups, have little faith that the state is interested in their views or considers itself accountable to them. State-mandated avenues for participation are often limited to service-delivery complaints rather than consultation on policy or budgeting, which, combined with flawed electoral processes, undermines the public's belief that they can influence decision-making.

Despite these challenges, civic engagement in Pakistan is not static—it is evolving in response to shifting demographics, technological access, and socio-political dynamics. The rise of youth-led initiatives, digital advocacy campaigns, and localised volunteer networks suggests that new forms of participation are emerging outside traditional frameworks. These movements often operate in informal spaces, leveraging social media and community organising to amplify voices that are otherwise excluded from formal decision-making processes. At the same time, civil society actors continue to navigate a complex landscape marked by regulatory constraints, public mistrust, and uneven access to civic education. This duality—of innovation and inhibition—underscores the need to assess civic engagement not only through institutional metrics but also through lived experiences and grassroots mobilisation.

5.3 | Civic Equality and Inclusion

Marginalised communities in Pakistan including women, members of the LGBTQIA+ community, religious and ethnic minorities, and persons with disabilities—continue to face

legal, structural, and societal barriers to civic participation. Although legal frameworks for inclusion exist, such as constitutional guarantees of equality under Articles 25, 26, and 36, they remain weakly implemented. There is little to no formal oversight ensuring inclusive engagement or non-discriminatory treatment in civic forums.

At the federal level, despite constitutional guarantees of equality, marginalised groups face institutional hurdles that limit their civic agency. Panelists emphasised that discriminatory social norms and insufficient legal protections have enabled recurring exclusion of religious and ethnic minorities from decision-making bodies, particularly at local levels. Panellists from Balochistan and KP cited examples where women-led or minority-led CSOs were informally discouraged from participating in official consultations or required to seek additional clearances.

These observations are reinforced by international monitoring organisations. The Amnesty International Report 2024 documents a rise in harassment and threats targeting activists defending minority rights, especially those advocating for land, education, or religious freedoms. The Human Rights Watch World Report 2025 similarly describes an environment of widespread intimidation and limited legal recourse, resulting in low civic participation by marginalised groups.

While some urban centers such as Karachi and Lahore have witnessed modest civic engagement by youth and women's groups, these remain isolated efforts and lack systemic state support. Community-driven outreach projects are typically self-initiated and rarely institutionalised. These patterns confirm that legal protections alone are insufficient and underscore the absence of meaningful accountability or redress for systemic exclusion. While some informal community outreach efforts exist, they do not constitute substantive civic inclusion.

Principle 6: Access to a secure digital environment

Score: 2.0

Pakistan's digital environment for civil society is evolving, but faces significant challenges related to access, security, and rights protections. While internet penetration is growing, disparities persist between urban and rural areas. The government exercises considerable control over digital spaces through regulatory frameworks, surveillance, and intermittent internet shutdowns, which restrict civil society's ability to operate safely and freely online. Legal instruments like the Prevention of Electronic Crimes Act (PECA) provide the government with broad powers to monitor and restrict online content, often under vague provisions that suppress dissent and target activists, journalists, and minority groups. Cybersecurity infrastructure and digital rights protections remain underdeveloped.

6.1 | Digital Rights and Freedoms

Pakistan's digital environment for civil society is increasingly repressive. In January 2025, parliament passed amendments to the Prevention of Electronic Crimes Act (PECA), criminalising the dissemination of "fake or false information"—vaguely defined—and imposing penalties of up to three years in prison and steep fines. These amendments also created multiple executive-controlled bodies, including the Social Media Protection and Regulatory Authority (SMPRA), empowered to block or remove content deemed "unlawful and offensive", effectively expanding executive oversight without judicial safeguards.

Human rights watchdogs have strongly condemned the law. Human Rights Watch warned that these provisions "seriously threaten internet freedom and free expression" citing the inclusion of undefined offences and the exclusion of public consultation. Amnesty International similarly criticised the provisions, emphasising their vague framing and the risk of chilling dissent.

Since February 2024, access to X (formerly Twitter) has been blocked in Pakistan, ostensibly for "national security" reasons. This disruption severely impeded advocacy campaigns and information-sharing among CSOs. Many resorted to virtual private networks (VPNs) to circumvent the ban, but these too came under scrutiny with the introduction of a VPN "whitelisting" mechanism.

Simultaneously, the government established the National Cyber Crime Investigation Agency (NCCIA) in May 2024, replacing the FIA's Cybercrime Wing. While its ostensible mandate is cybercrime prevention, critics have raised concerns that it could be used to intensify surveillance and crack down on critics under the guise of security.

Moreover, Pakistan's use of internet shutdowns surged in 2024, with 21 shutdowns documented—the highest ever for the country. These outages, often timed with protests, elections, or unrest in regions such as Islamabad, KP, and Balochistan, severely disrupted civic organising and access to information. The economic toll of these digital restrictions has been massive. The country lost $1.62 billion due to 9,735 hours of partial or complete Internet shutdowns in 2024.

Together, these developments have created a digital environment marked by censorship, surveillance, and shrinking civic space. Civil society actors face structural barriers to expression, advocacy, and connectivity—challenges that undermine digital rights and hamper online engagement.

6.2 | Digital Security and Privacy

Pakistan's digital environment is characterised by an expanding digital surveillance regime, absence of data protection safeguards, and heightened risks to civil society actors' digital safety. Parallel developments under the Digital Nation Pakistan Bill, tabled in late 2024, reinforce these concerns. Section 29 of the bill explicitly bars judicial review of decisions made by the newly-proposed Digital Rights Protection Authority, raising concerns about unchecked executive power over citizens' personal data and digital activities. The official Senate draft confirms these provisions, which rights groups say contradict international norms on privacy and due process. Digital Rights Foundation strongly criticized this bill for establishing an expansive data collection system without corresponding legal safeguards.

Beyond legal frameworks, CSOs face direct digital threats. According to the expert panel and reports from the Digital Rights Foundation, journalists, activists, and human rights defenders are frequently targeted by malicious actors through sophisticated phishing attacks, spyware, and coordinated online harassment campaigns designed to silence them and compromise their data. The government has not demonstrated a willingness or capacity to investigate these attacks, nor does it actively promote disinformation awareness.

According to the Freedom Network's February 2025 Digital Pakistan Monitor, at least 16 incidents involving digital harassment, surveillance, and unauthorised data exposure targeted human rights defenders and journalists. In some cases, personal data was leaked via anonymous accounts, triggering reputational damage or legal threats. No state-led investigations or remedies were made available. Yet Pakistan still lacks a data protection law

or independent commission to investigate misuse. As documented in the CIVICUS Monitor's 2025 Watchlist, civil society actors face growing risks from surveillance, cybercrime laws, and politically motivated prosecutions, especially when working on rights-based issues or challenging official narratives. These developments indicate a systematic failure to protect digital security and privacy.

6.3 | Digital Accessibility

Access to digital tools and platforms remains highly unequal across Pakistan, restricting the civic engagement and operational reach of civil society, particularly in rural and marginalised communities. Over half the country's population remains offline, with Pakistan's internet penetration at just 45.7% as of early 2025. Significant affordability gaps, poor infrastructure, and limited smartphone ownership persist, especially among women, persons with disabilities, and rural residents. Panellists confirmed that CSOs in regions such as South Punjab, northern Balochistan, and interior Sindh face persistent difficulties accessing the internet, due to both infrastructure limitations and frequent suspensions.

Language and accessibility barriers also constrain digital inclusion. Most official platforms, advocacy campaigns, and public service portals remain limited to English and Urdu, offering little content in regional languages or formats accessible to persons with disabilities. Moreover, women remain disproportionately excluded from meaningful digital participation due to low digital literacy, affordability challenges, and restrictive social norms, with data showing that only 29.6% of social media users are female.

Despite efforts outlined in the Digital Nation Pakistan Act 2024, such as the establishment of the Pakistan Digital Authority and National Digital Commission, implementation challenges persist. This environment of systemic exclusion and infrastructural control constitutes a disabling environment—reflecting digital tools and platforms that are technically available but significantly restricted in practice for a large portion of civil society actors.

C) Recommendations

- The findings of this report underscore an urgent need for **systemic reform** to reverse the ongoing trend of a shrinking civic space in Pakistan. Guided by the **enabling environment framework** for civil society, the following recommendations outline a strategic roadmap of actionable priorities for key stakeholders to foster a more open, resilient, and democratic society.

Recommendation 1: Reform the Legal and Regulatory Architecture

The current legal framework is primarily used to control, rather than enable, civil society. A fundamental overhaul is required to shift its purpose towards facilitation, transparency, and protection of civic freedoms.

For the Ministry of Interior and Ministry of Law and Justice

- Initiate a time-bound, consultative reform process with a diverse range of CSOs to repeal or amend restrictive laws.
- Develop a single, simplified legal framework for CSO registration and regulation that is transparent, predictable, and consistent with constitutional freedoms.
- Remove vague clauses in laws such as the Prevention of Electronic Crimes Act (PECA) that enable criminalisation of dissent.
- Repeal or amend Section 144 powers to prevent abuse in restricting peaceful assemblies.

For the Economic Affairs Division (EAD) and Provincial Home Departments

- Overhaul opaque “security vetting” and No Objection Certificate (NOC) processes and replace them with evidence-based, transparent, and time-bound systems.
- Establish an independent oversight body (e.g., ombudsman) to review denials of NOCs, registration applications, and foreign funding approvals, with an accessible appeals mechanism.

For the Parliament and Parliamentary Standing Committees

- Launch public hearings on civic space laws, ensuring transparency and public participation in the reform process.

For the International Community (EU, UN Special Rapporteurs)

- Engage with the Government of Pakistan to press for reforms, particularly on PECA, Section 144, and NOC systems, as part of human rights and governance dialogues.

Recommendation 2: Uphold Fundamental Freedoms in Practice

Constitutional guarantees of freedom are meaningless without consistent protection in practice.

For Provincial Governments

- Cease routine and pre-emptive use of Section 144 of the Penal Code to ban peaceful assemblies, restricting it to genuine public order emergencies.

For the Ministry of Information Technology and the Pakistan Telecommunication Authority (PTA)

- End internet shutdowns and the blocking of social media platforms as a tool to control information.
- Fast-track the enactment of a robust, rights-respecting Data Protection Law to protect citizens and CSOs from unchecked surveillance.

For the Ministry of Finance

- Introduce tax incentives to encourage domestic philanthropy from individuals and corporations to certified CSOs.

For Law Enforcement Agencies

- Develop and enforce provincial-level training and accountability frameworks to prevent harassment, intimidation, and arbitrary detention of journalists, activists, and human rights defenders.

For the Human Rights Commission of Pakistan (HRCP)

- In partnership with international observers (e.g., UN OHCHR), monitor assemblies and protests to ensure compliance with international human rights standards.

For Donor Governments and the EU Delegation

- Include protection of civil society environments clauses in bilateral agreements and development cooperation frameworks.

Recommendation 3: Protect Civil Society Actors in Digital Spaces

Civil society's ability to function increasingly depends on a safe, open, and rights-respecting digital environment. With the expansion of surveillance powers, the blocking of platforms, and the passage of restrictive PECA amendments, digital repression has become one of the most significant threats to Pakistan's civic space. Protecting online freedoms is therefore essential to preserving democratic participation.

For the Government of Pakistan (Ministry of Information Technology, Ministry of Interior, PTA)

- Withdraw or amend the most repressive provisions of the 2025 PECA amendments, particularly those granting unchecked censorship powers to SMPRA.
- End the practice of arbitrary platform bans and ensure that any content regulation is subject to judicial review and international human rights standards.
- Establish an independent Data Protection Commission with authority to investigate, sanction, and prevent misuse of personal data and surveillance technologies.

For Donors and the International Community

- Support digital security training, tools, and infrastructure for CSOs, particularly women-led, minority, and rural-based groups, to safeguard against surveillance and online harassment.
- Provide dedicated funding for building resilient digital advocacy networks and protecting journalists, activists, and human rights defenders from cyber-attacks.

- Request formal review of Pakistan's digital rights framework by the UN Special Rapporteur on Freedom of Expression and the Freedom Online Coalition.

Recommendation 4: Foster a Sustainable and Resilient Civil Society

The long-term viability of civil society depends on a supportive, diversified, and secure resource environment.

For the International Community and Donors

- Adapt funding modalities to provide more flexible, long-term, and core funding, enabling institutional stability.
- Simplify compliance and reporting requirements, particularly for smaller grassroots organisations.
- Establish pooled rapid-response funds for CSOs facing harassment, operational shutdowns, or emergency needs.

For the State Bank of Pakistan

Develop simplified banking procedures for CSOs to reduce financial exclusion and delays in access to funds.

For the Corporate Sector

Implement Corporate Social Responsibility (CSR) quotas for large companies to support grassroots CSOs, with public reporting of contributions.

For Civil Society Organisations

- Strengthen internal governance, transparency, and accountability to enhance public trust.
- Build broader coalitions for collective advocacy and invest in strategic communications to demonstrate the value of civil society to the public.

Recommendation 5: Build Trust and Constructive Dialogue

An adversarial state–civil society relationship undermines democratic governance. Building constructive, institutionalised dialogue platforms is essential.

For the Ministry of Information

- End state-sponsored negative narratives portraying CSOs as foreign agents or threats to national interest.
- Publicly recognise civil society as a legitimate partner in development and democratic accountability.

For the Planning Commission and Federal Ministries

- Move beyond ad-hoc consultations to establish permanent, inclusive multi-stakeholder dialogue platforms on key policy areas, ensuring diverse CSO participation and transparent feedback loops.

For Provincial Governments

Establish provincial-level multi-stakeholder councils to ensure inclusion of marginalised communities, regional actors, and grassroots organisations in policymaking.

For Joint Government–CSO Platforms

Create a joint working group to track implementation of these recommendations, with biannual public progress reports.

For International Partners (EU, UNDP, Embassies)

Facilitate and support these dialogue platforms, while holding the government accountable to commitments made through them.

D. Research Process

The findings presented in this Country Focus Report are the result of a rigorous, multi-stage research process conducted in Pakistan to ensure an assessment that is evidence-based, objective, and reflective of the complex realities of the local civic space. Each principle is assessed and aggregated to provide a quantitative score on a five-category scale (from fully disabling to fully enabling), which reflects the degree to which the environment enables or disables the work of civil society.

The cornerstone of the methodology was the convening of a diverse and balanced expert panel, comprising representatives from civil society organisations, academic institutions, and CSO support centres. To address the limited availability of yearly updated external quantitative indicators, this panel used a set of guiding questions to assess the status of each principle. The discussions were supported by secondary sources, such as V-Dem and the Bertelsmann Stiftung Governance Index, which provide benchmarks and are complemented by primary data collection.

The assessment followed a multi-faceted approach combining independent analysis with collective consensus. Prior to the formal panel discussion, individual experts independently scored each dimension. The panel discussion then served as a vital forum for in-depth analysis and consensus-building, where participants engaged in robust deliberations, justifying their scores through a combination of secondary data and their professional, field-based experiences. While the final score for Principle 1 is benchmarked against the CIVICUS Monitor rating to ensure global consistency, it was nonetheless discussed in detail by the panel to build a shared, contextualised understanding of the broader environment. Guided by these deliberations, the panel assigned scores for each dimension, which were then aggregated using a weighted average to determine a single score per principle. This approach balances diverse perspectives with a structured and objective evaluation framework, ensuring this report offers a well-rounded and credible perspective on the state of civil society in Pakistan.

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