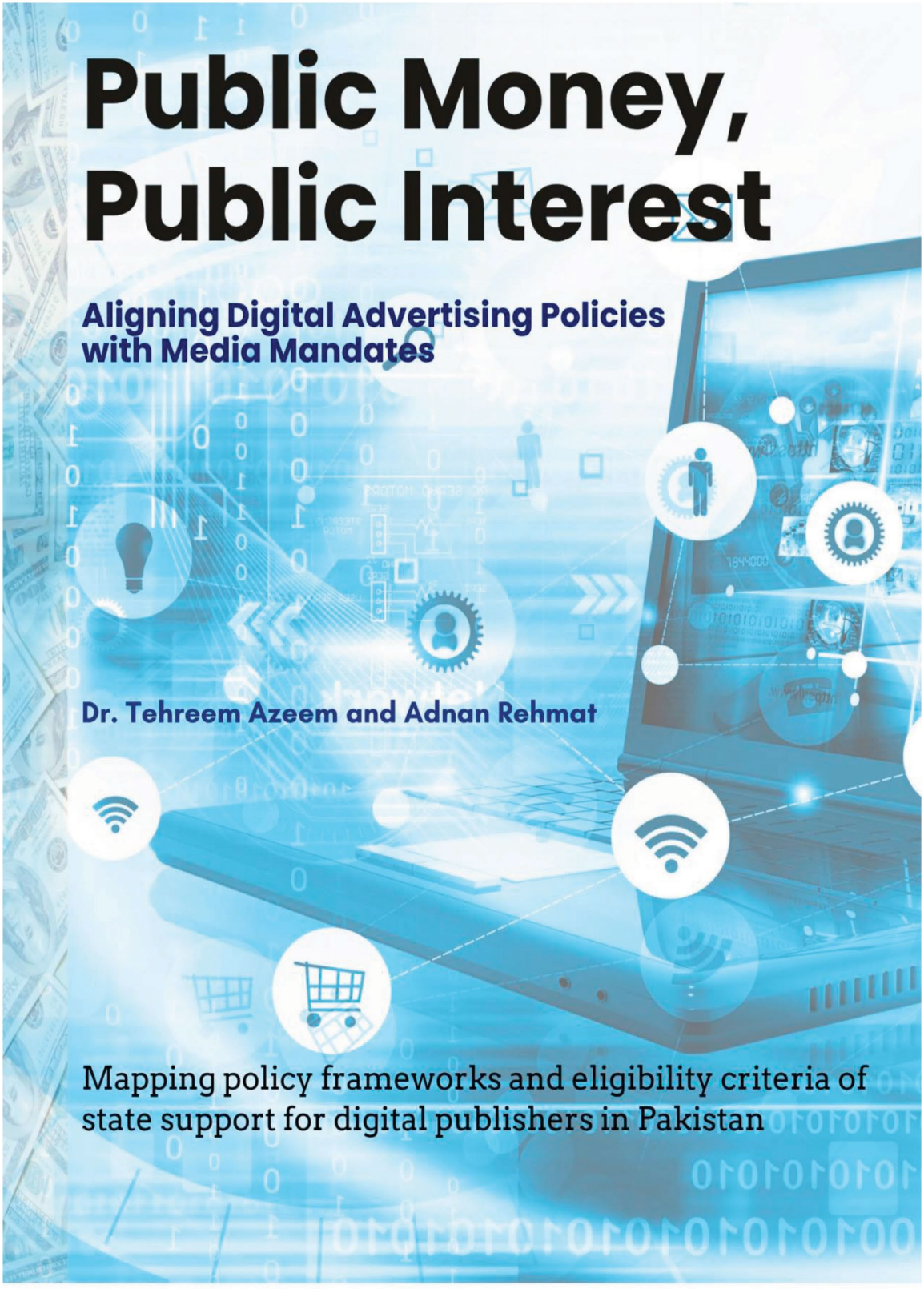
# Public Money, Public Interest

## Aligning Digital Advertising Policies with Media Mandates

Dr. Tehreem Azeem and Adnan Rehmat



Mapping policy frameworks and eligibility criteria of state support for digital publishers in Pakistan

IRADA

mediastan
supporting public interest media development in pakistan

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**Dr Tehreem Azeem and Adnan Rehmat**

A qualitative study of state support for independent digital publishers in Pakistan by mapping and evaluating digital media advertising, revenue and taxation policy frameworks and their eligibility criteria

**2026**

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## ACKNOWLEDGEMENT AND DISCLAIMER:

This report was produced by **IRADA** – **iradapk.org**, a native Pakistani rights and development advocacy organization with support of **International Media Support (IMS)** – **mediastanpk.com**, a global leader in media development. The contents of this report are the sole responsibility of IRADA. The co-authors **Dr Tehreem Azeem** and **Adnan Rehmat** are thankful of support from **Muhammad Aftab Alam** of IRADA and **Waqas Naeem** of IMS and the several independent digital public interest journalism platforms interviewed for this study for their inputs in producing the information resulting in this report. **Dr Tehreem Azeem** is an academic and communications strategist based in Islamabad (tehreemazeem@outlook.com) and **Adnan Rehmat** is an independent media analyst and media development strategist and advises IMS for its programs in Pakistan and Asia region. This report is produced in good faith without prejudice against anyone.

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# EXECUTIVE SUMMARY

This report examines how Pakistan's federal and provincial digital media advertising, revenue and taxation policies affect the viability of independent digital public-interest journalism. Its relevance is linked to the rapid growth of digital news platforms in Pakistan in recent years since the expansion of mobile broadband, alongside the continuing financial decline of legacy media and the increasing public dependence on online information. Non-legacy independent digital media and information outlets now cover human rights, governance, minority issues, conflict, local accountability and public services – and yet the policy environment has not evolved sufficiently to recognize or support their democratic value.

The consequences of policy gaps and fair criteria for access to allocated public sector advertising adversely affect the survival of individual digital media and information outlets but also directly impacts citizens' access to credible public-interest information. When independent digital media lack the means to remain viable and financially sustainable, their ability to report consistently on governance, rights, accountability, public services, marginalized communities and local issues is weakened. This, in turn, narrows the diversity of voices in the public sphere, increases dependence on commercially driven legacy media, and undermines overall media independence. This weakens the quality of democracy because citizens are deprived of the reliable information they need to understand public affairs, hold power to account and make informed choices.

The central problem identified by this study produced by IRADA and conceived and supported International Media Support (IMS) is that while digital-native journalism in Pakistan is acknowledged in policy language, it is not institutionally accommodated or prioritized. There is no clear legal, administrative or taxation category for independent digital news organizations. Consequently, the media and information outlets are forced to register as companies, partnerships, marketing entities or unrelated service providers, while navigating opaque registration systems, unclear eligibility rules, unrealistic traffic thresholds, tax ambiguities and discretionary access to public advertising.

The most important findings are that government advertising frameworks often confuse journalism with influence by grouping digital publishers with influencers, vloggers, bloggers, advertising agencies and content creators. Eligibility criteria tend to favor scale, infrastructure, prior commercial work and raw audience metrics over editorial credibility, regional relevance and public-interest value.

Additionally, legacy media retains structural advantages through established access, bundled reach and stronger lobbying capacity, while independent digital outlets face

non-responsive portals, informal gatekeeping and payment delays. Social media monetization and donor funding offer partial alternatives but remain volatile, low-yield and vulnerable to shifting platform rules or donor priorities. Taxation further compounds the sector's fragility because the state taxes digital media earnings without providing sector-specific clarity, relief or recognition.

How should these challenges be addressed? The report recommends that federal and provincial governments formally recognize digital-native public-interest journalism as a distinct media category; introduce mandatory, regular and inclusive consultation mechanisms; publish all eligibility criteria, allocations, rates, application decisions, payment timelines and appeal processes online; separate public-interest journalism from influencer marketing; and create protected public-interest allocations within digital advertising budgets.

It also recommends differentiated eligibility tiers for small, medium and large outlets, standardized but regionally adjustable compensation rates, prompt-payment rules, an independent public-interest journalism scorecard, direct contracting options, and a simplified taxation framework that recognizes journalism as a democratic public good. Together, these reforms would help shift public advertising from discretionary patronage toward transparent support for plural, credible and independent digital journalism.

**Islamabad, September 2026**

**Dr Tehreem Azeem and Adnan Rehmat**

CHAPTER 1

# RESEARCH PURPOSE AND METHODOLOGY

Since Pakistan auctioned 3G and 4G spectrum in April 2014, the country's telecommunications landscape has changed significantly. These high-speed cellular data services enabled telecom operators to extend mobile broadband networks beyond major urban centers into smaller cities and rural areas. As a result, internet access became financially accessible to lower-income households that fixed-line connections had never served. Over the past decade, Pakistan has witnessed substantial growth in smartphone penetration and internet usage. According to the Pakistan Telecommunication Authority (PTA)[1], the country had over 210 million monthly mobile cellular subscribers as of August 2026, with mobile teledensity at 83.35%. Mobile broadband subscribers exceeded 162 million, overall broadband subscribers stood at 166 million and broadband penetration reached 65.80%.

This surge in connectivity transformed every sector in Pakistan, from banking and commerce to education, healthcare and governance. It also reshaped how information itself moved through the country and changed including how news got produced, distributed and consumed. More people began consuming news online through websites, social media, video platforms and messaging applications. News organizations and journalists established their online presence to address the information needs of audience increasingly seeking news through the internet. Established organizations added digital platforms to their existing products and services, while many journalists used the same shift to launch their own news startups serving niche audiences.

This migration eroded the core business model of traditional media in Pakistan over the decade since the launch of 3G/4G. With the internet boom, newspaper circulation declined and several publications shut down entirely. Television lost viewership and advertising revenue to digital platforms as well. This revenue erosion forced cost-cutting across the industry resulting in job loses for thousands of journalists and media workers. Some left the industry, while others seeing the potential of digital media decided to experiment with it. They established their own independent digital news outlets serving niche audiences. These outlets allowed them to fill the information gap that had always been present in traditional media in Pakistan.

These journalists' led independent digital news outlets report on investigative stories, human rights, regional and minority-language issues, conflict and governance. These issues have always struggled to find their due space in traditional media that remained under different forms of censorship. Reporters Without Borders ranked Pakistan 153rd out of 180 countries in its 2026 World Press Freedom Index[2]. In this media state, independent digital news outlets have become a source of plural journalism in Pakistan, giving journalists relatively more editorial freedom and direct connection with audiences than that traditional media had restricted.

[1] https://www.pta.gov.pk/home
[2] https://rsf.org/en/index

This relative editorial freedom and audience connection, however, do not by themselves keep a newsroom running. Financial sustainability determines whether the news organizations can keep their freedom intact or not. Pakistan's digital news organizations have had to work this out largely on their own as around the 2026 time mark the country has limited infrastructure, administrative and institutional support available to keep this media segment sustainable. While journalists continue to experiment with different operational models, their viable revenue options remain severely limited. Subscriptions have never worked as a viable revenue model in Pakistan. The little philanthropic or donor funding that reaches such organizations rarely provides them long-term stability. Consequently, commercial and government advertising remain critical lifelines for the sector.

Government advertising historically has served as the primary source of revenue for the legacy media sector in Pakistan. This dynamic began to shift in 2021, when federal and provincial authorities officially recognized digital media by introducing advertising policies aimed at digital publishers, influencers and content creators. While this policy shift marks a pivotal step toward institutional support for a self-built sector, the critical question remains whether these funds are meaningfully reaching independent digital newsrooms and driving actual growth based on their eligibility criteria.

Although several recent studies have documented the rise, challenges and restrictions facing digital media in Pakistan, very few have attempted to examine how government advertising policies actually treat the sector in practice. Significant uncertainty surrounds how these policies are formed, what eligibility and registration requirements apply to digital news publishers, and how government bodies allocate public advertising funds across the sector. Furthermore, how bureaucratic culture, tax regimes and regulatory hurdles dictate operating costs and formalization requirements for digital platforms in Pakistan requires further exploration. Without empirical clarity on these mechanisms, theoretical policy gains will fail to yield meaningful, real-world support.

To address this gap, this study aims to map and evaluate Pakistan's official digital media policy framework and examine how existing laws, regulations, public sector digital media advertising/revenue policies and rules, taxation policies and revenue structures influence the financial viability and growth of independent digital news platforms in the country.

## Research objectives

The study pursues the following objectives:

1. To map the institutional, legal and regulatory framework governing independent digital news/journalism platforms and organizations in Pakistan including their licensing, registration and taxation requirements.

2. To examine the federal and provincial policies and regulations related to government sector advertising/revenues for independent digital media, including budgetary allocations and disbursements for the past few years and eligibility criteria.
3. To analyze how taxation and revenue policies affect financial sustainability of independent digital news/journalism platforms.
4. To identify the policy gaps and regulatory barriers affecting the financial viability of independent digital news and journalism platforms and organizations.
5. To develop recommendations for strengthening eligibility for and access to government sector financial support for Pakistan's independent digital news and journalism platforms and organizations, including public sector advertising.

## Research questions

To achieve these objectives, the study seeks to answer the following specific research questions:

1. What institutions, laws and regulatory bodies govern independent digital news and journalism platforms and organizations in Pakistan and how do the latter experience compliance with them?
2. What models of public sector advertising policies, budgetary allocations and eligibility criteria exist at the federal and provincial government levels for independent digital news and journalism platforms and organizations, and how do taxation policies influence their financial viability?
3. What is the experience of independent digital news and journalism platforms and organization in accessing public sector advertising?
4. What reforms do independent digital journalism entrepreneurs recommend to strengthen the policy framework governing the sector so that they are considered at par with the legacy media by the state?

## Research methodology

This study used a mixed-methods research design to map Pakistan's digital media advertising, revenue, and taxation policy framework from the vantage point of independent digital news organizations operating across the country. A qualitative approach was chosen because the study set out to understand how stakeholders experience, interpret and navigate the regulatory environment, revenue models, taxation policies, and government advertising practices that shape the sector. The insights were aimed at being best captured through direct engagement with practitioners rather than through numbers alone.

Participating organizations were drawn from a wider digital public interest journalism cohort that the International Media Support (IMS) and its partner Institute for Research, Advocacy and Development (IRADA) have long worked with. All organizations in this

cohort were invited to take part in the study. Their participation was completely voluntary. Eleven organizations responded with interest and were subsequently included. Data collected from these interviews was complemented by a policy mapping exercise, based on a desk review of the relevant legislation, regulations and institutional mandates governing digital media in Pakistan.

Data was collected through three stages, combining secondary and primary sources.

**Stage 1:** First, a review of relevant laws, regulations, policy documents and official reports was conducted to establish the existing regulatory and institutional baseline against which practitioner experiences were assessed.

**Stage 2:** In next phase, the participating digital news organizations were asked to complete a structured organizational profile questionnaire ahead of their interview. The questionnaire had questions about key organizational details, including founding year, legal structure, registration status with the national business registry Securities and Exchange Commission of Pakistan (SECP), national taxation authority Federal Board of Revenue (FBR) and relevant provincial bodies, as well as their team size, platforms used, revenue streams and approximate revenue range. This step ensured that each organization's interview responses could be read in their specified context. It also allowed the study to compare experiences across organizations of different sizes, structures and maturity.

**Stage 3:** Finally, semi-structured interviews were then conducted with the knowledgeable executive-level founders, directors of news and editors of the participating organizations, to capture their views on and experience of government's policies on advertising, revenue and taxation for digital media in Pakistan. The semi-structured format gave respondents room to speak openly about regulatory compliance, business sustainability, revenue generation, taxation, access to government advertising, and the practical challenges they face in engaging with policy. The interview guide and consent form used for this exercise are included in the annexure.

The interviews were conducted with participants' informed consent in July and August 2026. All interviews were audio-recorded with permission to support accurate transcription. Each interview lasted 45 minutes to one hour on average. The interviewer also took supporting notes during each session. To protect the privacy of participating organizations, findings in this report attribute quotes not to individual organizations by name but to the geographical region in which each operates. It allows the report to highlight province-specific issues without identifying individual respondents.

To ensure documentation to the experiences with regional policies, digital news organizations working across Sindh, Khyber Pakhtunkhwa, Islamabad, Gilgit-Baltistan,

Punjab and Balochistan were engaged. Four organizations were operating in Khyber Pakhtunkhwa, three in Punjab, two in Islamabad Capital Territory, one in Sindh and one in Gilgit-Baltistan. Their operations ranged from single-founder outlets running on personal savings to established organizations with dozens of staff members and multiple revenue streams. This range gave a valuable lens into how policies and support mechanisms designed for one end of the spectrum often fail to reach the other. All organizations were using a mix of digital and social platforms, including websites, Facebook, X, LinkedIn, Instagram, TikTok, newsletters and WhatsApp channels.

Of these organizations, eight were registered as private limited companies and one as an association of persons/partnership. One organization operated as a project under a non-governmental organization and was not separately registered as a digital news platform. A further Islamabad-based organization remained unregistered with any government body. Eight organizations were also registered with provincial regulatory bodies while five were additionally registered with provincial revenue authorities.

Only one organization was registered with the Ministry of Information and Broadcasting (MoIB) and the Press Information Department (PID) to access government advertising funds. However, a total of two organizations reported receiving government advertising funds in the past two years.

These organizations relied on a range of revenue streams beyond government advertising including brand deals, sponsored content, reader donations, grants, social media platform monetization, consulting or training services, content syndication or licensing, service contracts, digital marketing and programmatic display advertising. Not all organizations disclosed their annual revenue. Two reported earning between PKR 1–5 million annually, one reported earning PKR 15–50 million annually, one reported no revenue, while the remaining organizations chose not to disclose this information.

CHAPTER 2

# REVIEW: FEDERAL, PROVINCIAL AND REGIONAL DIGITAL MEDIA ADVERTISING POLICIES

## Federal Media Advertising Policy, 2021

The government of Pakistan introduced an advertisement policy in 2021[3] which was later amended in 2022. The stated aim of this policy is to provide a broader framework for public sector advertisements and communications. The policy states that federal government advertisement funds can only be released to those publications, TV channels, radio channels, cinemas, cable operators, outdoor and digital media platforms which are registered/enlisted with the MoIB and adhere to Article 19 of the Constitution of Islamic Republic of Pakistan, 1973, as well as media code of ethics, in vogue.

The text of Article 19[4] reads: "Every citizen shall have the right to freedom of speech and expression, and there shall be freedom of the press, subject to any reasonable restrictions imposed by law in the interest of the glory of Islam or the integrity, security or defense of Pakistan or any part thereof, friendly relations with foreign States, public order, decency or morality, or in relation to contempt of court, commission of or incitement to an offence."

Federal media advertising policy further states that the Cyber Wing of MoIB "shall register, maintain and update the list of news websites, web portals, social/digital media platforms and influencers, and shall also verify the claims according to the notified rules/procedures/SOPs [Standard Operating Procedures]." The MoIB has published a website registration form[5] on its portal for registering digital news outlets in Pakistan. However, this form does not recognize the diversity of digital news outlets in Pakistan. It basically registers websites with significant daily traffic. Some digital news organizations interviewed for this report were not working extensively on their websites. They had, instead, their focus on social media platforms which have in recent years grown to become a key source of news among information consumers.

The policy also states that the Planning Commission shall earmark 0.5% to 2.5% of total budget outlay of any Public Sector Development Program (PSDP) project for running effective publicity and mass awareness campaigns. The policy also requires PID to apply 25% quota, in addition to all advertisement releases emanating from federal government ministries/ divisions/ attached departments/ autonomous and semi-autonomous/ corporations/ authorities and statutory bodies etc. towards supporting regional, language and evolving media. The policy also requires PID to determine and apply 25% quota on the basis of cost (for display advertisements to publications, TV channels, FM stations) or number of stations (for classified advertisements to publications).

[3] https://www.moib.gov.pk/downloads/Approved-advertisement-Policy-2022.pdf
[4] https://www.na.gov.pk/uploads/documents/1333523681_951.pdf
[5] https://moib.gov.pk/digital-advertisment-registration/websites.aspx

## The Sindh Government Adevrtisement, Publicity and Film Production Policy, 2024

The Sindh Government Advertisement, Publicity and Film Production Policy, 2024[6], sets out the eligibility criteria and protocols through which advertisement funds are allocated to media, including digital media in Sindh. According to this policy, funds are released exclusively through the Information Department based on "regularity, frequency, circulation, viewership, quality, audience, and market assessment, alongside ratings, rankings and surveys that assess a media outlet's outreach and influence objectively." Registration with the department is not mandatory though the policy states that registered platforms will be given preference.

The policy requires the Directorate of Advertisement to maintain and update list of news/websites and/or portals, and/or subsequent any other new media platform(s) and release the advertisement in category wise allocations. The policy reserves 5% quota for Sindhi language websites.

The policy's eligibility criteria for websites reflect little understanding of how digital-native outlets in Pakistan – including Sindh – actually operate. A website must have a minimum of 20,000 monthly visitors to qualify for government advertising, with rates calculated on a cost per mile (CPM) and cost per day (CPD) basis, a minimum CPM of PKR 100 and a CPD of up to PKR 50,000.

The CPM is the price an advertiser pays (in this instance, the Sindh government) for every 1,000 times an ad/content is shown on a website. 'Mille' is Latin for a thousand so 'M' represents 1,000 views. A website/publisher earns based on how many total views their ads receive regardless of whether their readers click on them. An 'impression' counts each time a visitor loads a page and views an advertisement. The CPM is calculated by dividing the total cost of the ad campaign by the total number of impressions, then multiplying that number by 1,000. For example, if an advertiser pays PKR 10 for 5,000 ad views on a website, the CPM is PKR 2.

The CPD, in advertising rates, most commonly stands for 'cost per day" – a flat-fee pricing model where an advertiser (such as the Sindh government here) pays a fixed rate for an advertisement to run on a webpage, app or specific ad space for a 24-hour period. The CPD formula: CPD = total ad spend divided by the number of days.

The final advertisements rates by the Sindh government are set by the Advertisement Rate Fixation Committee. The department conducts web traffic verification itself. The policy states that eligible websites may be owned and operated by newspapers, TV

[6] https://information.sindh.gov.pk/files/information/ADVT%20POLICY%202024-25.pdf

channels, or media professionals in Pakistan. All websites must adhere to Article 19 of the Constitution.

This policy also acknowledges "influencers" as a distinct eligible entity that can receive advertisement funds along with media. They are divided into four categories based on their follower count. The lowest tier influencers must have followers between 50,000 and 100,000 followers while influencers in highest tier have up to one million or more followers at the highest. "Local digital publishers" are similarly divided into five categories based on their monthly traffic, ranging from a minimum of 200,000 to 500,000, up to five million or more at the highest tier.

Separate registration and advertising mechanisms apply to the following categories of media/publishers: "influencers", "bloggers" and "vloggers". To qualify for provincial government advertising, each must maintain an active profile for a minimum of 18 months and demonstrate prior work with multinational companies, government agencies or the private sector.

On the other hand, digital publishers are required to have "an established office" in a "metropolitan city in Pakistan," dedicated digital marketing and media specialists, an SEO specialist, digital content specialists, online research associates, a client list demonstrating prior handling of digital advertising business, adequate financial liquidity to manage advertising campaigns and a valid National Tax Number (NTN).

The metropolitan cities of Pakistan include Karachi, Lahore, Faisalabad, Peshawar, Rawalpindi, Gujranwala, Multan, Hyderabad, Sialkot, Quetta and Islamabad. All these cities have populations of one million or more.

The policy also addresses the production of films, dramas, and documentaries for public awareness and narrative-building purposes. Eligible production houses must be registered with SECP, FBR, and the Sindh Revenue Board (SRB), hold a valid license for media production in Pakistan, and employ a qualified team of creative professionals. They must also demonstrate financial soundness and a commitment to producing content that is "ethical, culturally sensitive, and compliant with relevant regulations." Production houses are scored on a scale of 100 points against these criteria, with a minimum qualifying score of 70.

## Balochistan Advertisement Policy, 2026

In 2026, the Balochistan government introduced a new provincial advertisement policy with a state aim of eliminating "dummy publications", encouraging credible and market-based media organizations, and promoting transparency and merit in the allocation of government advertising. While officially announced, at the time of producing this report

(August 2026), the policy text itself was not accessible on the website of The Directorate General of Public Relations (DGPR) Balochistan. However, media reports pointed to a general rejection of the policy by both newspapers and digital publishers in the province.

According to these media reports[7], the text of the policy introduces an automated system for issuing tender notices, auction notices, pre-qualification notices and advertisements of expression of interest on behalf of the provincial government to be advertised through provincial-based media. Press bodies have raised concerns that this shift could significantly affect the financial stability of newspapers and distance the provincial government from the traditional media sector.

The Council of Pakistan Newspaper Editors (CPNE), the guild of print media editors, has argued that the policy was weighted heavily toward digital platforms. The council also said that the policy was impractical given Balochistan's infrastructural constraints like inadequate internet connectivity and limited digital access across much of the province. CPNE has also criticized the policy for applying different eligibility standards to print and digital media, arguing this discrepancy could allow unregulated digital entities easier access to public advertising than established outlets, which could undermine journalistic credibility in the process.

The All Pakistan Newspapers Society (APNS), which represents over 470 print media publications in the country, has raised similar concerns. It has stated that restricting certain advertisement categories away from print could reduce newspaper revenues, limit bidders' access to procurement information, and reduce transparency in government procurement processes. APNS has fears that the shift in apparent favor of digital publications could risk a severe financial crisis for Balochistan's beleaguered newspaper industry and strain the relationship between the provincial government and the press.

The Balochistan Digital Publishers Forum (BDPF), a Quetta-based group of non-legacy digital publishers established to represent digital journalists, tackle regional publishing challenges and advocate for fair digital advertising rights, is not pleased either. It has called out the government for not consulting digital publishers before formulating the policy, and for failing to define clear criteria for digital publishers to access the funds. It has asked the provincial government to formulate a viable, transparent framework aligned with federal and other provincial media guidelines, developed through genuine consultation with all stakeholders, rather than adopted unilaterally.

Despite these concerns, the DGPR Balochistan has a form available on its website for registration of digital news organizations[8]. However, this form recognizes only three

[7] https://www.thenews.pk/print/1424556-media-bodies-concerned-over-balochistan-advertising-policy-apns
[8] https://www.dpr.gob.pk/DPRSMREG/

categories: "digital publishers with websites", "influencers" and "advertising agencies."
Punjab Government Digital Media Advertising Policy, 2022

The Director General Public Relations (DGPR) Punjab issued this policy[9] under the Information & Culture Department "to empower all Punjab government departments, authorities, and autonomous bodies to release advertisements through digital channels" in the same manner that they already do for print and electronic media. It states that all government departments, attached organizations/ autonomous bodies shall allocate 10% of their publicity/awareness/advertisement budget for digital media advertisement.

Punjab government policy structures digital media into distinct categories, each with its own eligibility criteria, rate structure and payment mechanism. The main categories are "web publishers", "Instagram influencers", "YouTubers", "sponsored articles", "content creators" and "disseminators".

According to this policy, the eligibility criteria for websites includes that those must be operated from Pakistan under the same domain continuously for at least two years and must fall into one of three categories: (i) news websites (excluding e-papers), (ii) infotainment websites, or entertainment websites, and (iii) portals. Minimum traffic thresholds are set by language and are 40,000 daily sessions for Urdu-language websites, 20,000 for English-language websites, and 10,000 for websites in Punjab's regional languages. The Digital Media Wing (DMW) verifies traffic exclusively through Google Analytics. The policy also states that the websites must also run advertisements through a credible third-party server and must adhere to journalistic ethics and Article 19 of the Constitution.

Advertisement rates for websites are charged on a CPM basis which are set uniformly at PKR 200 inclusive of a 15% agency commission and applicable taxes with premiums of 50% for "rich media formats" and 75% for "roadblock placements". Allocation across eligible websites is determined by a weighted formula: (i) demographic relevance to the campaign (40%), (ii) quality of content (30%), (iii) user-friendliness and mobile compatibility (15%), and (iv) website ranking (15%).

For Instagram-based influencers, the policy states that those must have at least 50,000 followers with at least 90% Pakistani followership and their profile must be at least two years old. Only Pakistani influencers are eligible for registration with an exception for international influencers in specific cases such as tourism campaigns. Applicants must also have prior experience working with at least two multinational companies or local advertisers. Compensation is set at 4% of an influencer's total follower count per post.

[9] https://icd.punjab.gov.pk/system/files/DMAP%202022_2.pdf

YouTubers face a substantially higher eligibility bar which includes a minimum of 300,000 subscribers, with 90% Pakistani subscribers, a channel at least two years old, and the same prior-brand-work and conduct requirements as influencers. Compensation is tiered by subscriber count, ranging from PKR 300,000 for channels with 300,000-499,999 subscribers to PKR 500,000 for channels with one million or more, with corresponding minimum view-count guarantees for each tier.

A separate, less-developed category covers other social media pages and content creators including Facebook-based pages. This category requires accounts to be at least two years old, Pakistan-based and to have a minimum of one million followers with 90% Pakistani followership, a considerably higher bar than either the influencer or YouTuber categories. Compensation is set at PKR 0.25 per video view with a minimum delivery requirement of 25,000 views within three days of a campaign's release.

## Gilgit-Baltistan Adevrtisement Policy, 2025

The Gilgit-Baltistan (GB) Advertisement Policy 2025[10] states that only the GB Information Department holds the mandate to maintain the region's officially registered media list. Under this policy, the department releases advertisements to digital media in consultation with the relevant client department, based on that department's requirements and budgetary allocation. The Information Department may also hire private firms or production houses for the preparation, design and publication of publicity material and the policy permits it to release television commercials (TVCs), publicity content and campaigns to digital media channels "on a need basis".

Digital media receives no dedicated treatment in the policy. While the policy sets out a detailed framework for newspapers, it addresses digital media only in passing, folded into a broader category covering electronic media that includes TV channels, cable TV networks, FM stations, and digital media in GB. It does not mention any separate eligibility criteria, registration process or other specific requirements for digital publishers within this category.

## Khyber Pakhtunkhwa Print, Electronic and Social/Digital Advertisement Policy, 2021

This Khyber Pakhtunkhwa (KP) policy 2021[11] states that only websites that meet the eligibility criteria set by the technical committee, as outlined in the Khyber Pakhtunkhwa Press, Newspaper, News Agencies and Books Registration Rules 2017, or any amendments made thereafter, are entitled to government advertisement and communication. It

[10] https://gilgitbaltistan.gov.pk/storage/downloads/GB%20Advertisement%20Policy%202025.pdf
[11] https://dgipr.kp.gov.pk/wp-content/uploads/2025/06/advt_policy_2021.pdf

states that a website must have operated continuously for at least two years under the same name and address, without interruption and must maintain a minimum of 50,000 daily visitors for English-language websites or 100,000 for Urdu-language websites. Websites must also run advertisements through a third-party server, provide access to campaign data both during and after a campaign's completion, and adhere to Article 19 of the Constitution. Rates for websites are fixed on the basis of traffic flow, calculated on a cost-per-thousand-impressions (CPM) basis.

The policy also sets out specific protocols for advertisements on social media. It states that social and digital campaigns will be assigned to at least three registered digital advertising agencies. It recognizes advertisements placed through social media influencers enlisted with the Information and Public Relations Department. These include Facebook and Instagram pages, X (former Twitter) accounts, YouTube channels and blogs, with rates varying by follower or visitor count.

The policy further states that applicable federal and provincial taxes will apply to both classifieds and campaign advertisements placed through print, electronic, and social or digital media, including campaigns executed through social media influencers.

## Comparative analysis of prevalent various digital media advertising policies

The federal, Punjab, Sindh, Khyber Pakhtunkhwa, Gilgit-Baltistan and Balochistan approaches towards allocation of public advertising funds to digital news organizations in Pakistan share one broad similarity: all recognize that public communication now requires digital channels. They also commonly rely on registration, audience metrics, compliance with Article 19 dealing with the rights to freedom of expression, and departmental discretion as gateways to public advertising. However, they differ significantly in how far they define digital media, how they distinguish journalism from influence, how they set eligibility thresholds, and whether they provide procedural clarity.

Punjab offers the most detailed categorization and rate structure, separating web publishers, Instagram influencers, YouTubers, sponsored articles and other content creators, but it also sets high thresholds that favor scale over journalistic value. Sindh recognizes websites, influencers, bloggers, vloggers, local digital publishers and production houses, but its criteria combine traffic, office infrastructure, metropolitan location, prior client work and staffing in ways that may exclude small public-interest outlets.

Khyber Pakhtunkhwa recognizes websites and social/digital campaigns but relies on high daily visitor thresholds and agency-mediated campaign mechanisms. Gilgit-

Baltistan provides the least digital-specific detail, treating digital media largely as an add-on to electronic media. Balochistan appears to have taken the boldest rhetorical step toward digital advertising reform, but the policy has been contested by both legacy and digital stakeholders because of limited transparency, unclear criteria, and insufficient consultation.

The key difference, therefore, is not whether digital media is mentioned, but whether it is understood. Punjab and Sindh are more elaborate but risk over-bureaucratizing digital eligibility. Khyber Pakhtunkhwa recognizes digital placement but sets scale-heavy thresholds. Gilgit-Baltistan is institutionally underdeveloped on digital media, while Balochistan is politically contested and procedurally unclear.

However, the common weakness of the digital media advertisement policies across all jurisdictions is the absence of a public-interest journalism lens: none adequately distinguish independent journalism from commercial influence, none reserve meaningful support for digital-native journalism, and none establish a transparent, consultative system that rewards democratic value alongside audience reach.

CHAPTER 3

# ANALYSIS – EXPERIENCES OF INDEPENDENT DIGITAL MEDIA PLATFORMS WITH OFFICIAL POLICIES

Representing qualitative analysis, this section presents findings from interviews with eleven digital news organizations and an analysis of federal and provincial government advertising policies, revenue structures and taxation for digital media. This section is organized around the study's four research questions: (i) the laws and institutions that govern digital news platforms, including how they register and how they are taxed; (ii) how federal and provincial governments allocate advertising budgets to this sector; (iii) what is it actually like, in practice, for these platforms to try to access that support; and (iv) what reforms the platforms themselves say are needed.

The analysis shows that there exists no clear legal category for digital-native news organizations in Pakistan, under which they can register, be taxed, and operate. As a result, independent platforms are left registering as private companies, marketing agencies, or even unrelated businesses just to operate, while navigating inconsistent rules from province to province and advertising criteria that are rarely transparent. This puts them at a lasting disadvantage compared to legacy print and broadcast media, even as their audiences and public-interest reporting continue to grow.

## Operating without a legal home

A recurring finding across almost all interviews is that the interviewed independent digital news platforms operate in a state of institutional ambiguity in Pakistan. SECP registers companies under four categories: public company, single-member company, private limited company, and public non-profit company (limited by guarantee). Of all organizations, eight organizations interviewed for this report were registered with SECP as private limited companies, one as association of persons, while two outlets had no registration.

One of those two outlets was operating as a project under a partner organization and was therefore not required to register while the other intended to formalize its registration as a single-member company once it had established itself more firmly. Some respondents said that they wanted to register as non-for-profit but acquiring that legal status entailed a lengthy and complex process and required hiring consultants and lawyers which was out of their budget. Hence, they decided to register under other available categories.

The registration process itself was straightforward and easier for every organization that had its registration with SECP. This basic registration enabled them to formalize their business status and begin news operations. However, due to the lack of a specific regulatory or licensing framework for digital news media in Pakistan, the organizations reported challenges in opening bank accounts and registering with the Federal Ministry of Information and Broadcasting (MoIB), the Press Information Department (PID) and provincial bodies to establish functional eligibility for government advertising.

Two organizations reported difficulties opening corporate bank accounts in local banks. One was based in Balochistan and had no SECP registration. The other was based in Punjab and operated as a partnership. Despite this difference in formal status, both organizations were asked by banks to provide a broadcast license issued by the Pakistan Electronic Media Regulatory Authority (PEMRA) even after they explained them that PEMRA does not have any given mandate to regulate digital media.

> *"No bank would open my account. They said, 'You should bring a PEMRA license. You are a news channel.' I told them PEMRA is for TV, but I am a digital organization."*

One of these organizations eventually used their personal connections to move the account-opening process forward while the other was still looking for a connection. Other organizations did not report any issue with opening their bank accounts.

The company registration process was the only stage at which the interviewed digital media publishers reported no significant difficulties, however, when they tried registering with MoIB, PID, and other provincial bodies to fulfil the eligibility criteria for receiving public advertising funds, they faced numerous challenges. Government advertising is a major source of revenue for media in Pakistan.

Digital media organizations also look at it to provide sustainability to their operations. The federal and provincial advertising policies require these organizations to register with relevant bodies as one of the eligibility criteria to receive public funds. However, this process is neither easy nor straightforward. Before elaborating those challenges, it is useful to develop an understanding of the federal and provincial advertising policies for digital media.

## Registration challenges

The registration of digital news organizations with MoIB, PID and provincial DGPRs appears straightforward on paper, however, respondents of this report's digital platforms reported several challenges with the process. Each of these bodies has a form on their official websites that the digital media organizations or individuals can fill for registration. Many organizations reported that they received no answer after filling the forms.

A Karachi-based organization said that it submitted the registration form on the MoIB website more than a dozen times but it never received any response. Another KP-based digital media outlet said that it also did not receive any response from the ministry and the provincial Information Department even after filling forms on their website multiple times. None of these bodies have a live application-tracking mechanism and any

published SOPs through which organizations can monitor the status of their registration.

Only one organization, based in Lahore, said that it was registered with MoIB, PID, and DGPR. This was possible because the outlet brought on a partner with a background in a major legacy media group and strong networking ties to officials within these bodies. Having previously been part of the television team that launched that channel, the partner was already familiar with the exact bureaucratic procedures, documentation requirements, and contact points within these departments. His familiarity with these offices and his links with officials helped the organization secure registration with all three bodies.

Almost all organizations interviewed for this study said that registration with MoIB, PID and provincial DGPRs depended less on meeting formal requirements than on having the right connections. An Islamabad-based outlet said that PID registrations were closed at the time of the interview and it typically required a strong reference from at least one minister.

> *"PID registrations are closed. They are not receiving any applications. Even when they are receiving them, that is only in cases where you have a minister's reference. We do not have one, so we currently do not have registration with PID."*

These challenges intensify for organizations based outside major cities specially in provinces like KP and Balochistan where limited access to decision-makers makes it harder for them to build the connections registration often depends on. The founder of a KP-based outlet recounted travelling to provincial capital city Peshawar and spending two futile days attempting to secure a meeting with the secretary of information to seek assistance registering with the Khyber Pakhtunkhwa Revenue Authority (KPRA). Despite meeting the official eligibility criteria, he was unable to register his organization on the portal. When he did manage to speak with the secretary, he was ultimately dismissed with non-committal, bureaucratic evasion ("Insha'Allah *phir baat karte hain* — if Allah wills, we will speak later").

Respondents also said that various representative platforms of journalists, such as unions, press clubs and associations, add another layer of difficulty for independent digital media seeking registration with MoIB and PID for advertisement funds. Several organizations said that many of these bodies and associations do not recognize digital journalists or digital media organizations at all, which is detrimental to arguing for recognition with government bodies.

> *"The press clubs and journalism institutes in Pakistan do not accept digital news organizations... They will consider me a journalist [if I have] a dummy newspaper... but they won't recognize a [bona fide] digital news organization."*

A KP based outlet said that local press club refused to issue press cards to its reporters saying that those were not journalists.

> *"The press club in Peshawar does not consider digital media, a legit form of media. They refused to give press cards to our reporters."*

An organization interviewed for this study said that traditional media unions/ associations fail to understand unique nature of digital news organizations and often mock them for working on social media.

> *"District government gave laptops to journalists in the press club. I thought it was time for digital media, social media — now we should work on it. But journalists working for traditional media made fun of us. They said: 'Now you will do journalism on Facebook.'"*

Dominated largely by traditional mainstream media, these bodies consider digital media a competitor and a perceived threat to their survival. Many organizations interviewed for this report said that these bodies resist government initiatives to register digital media outlets and allocate them advertisement funds. They perceive such initiatives as a threat to their existing share of state advertising revenue.

> *"Legacy media institutes perhaps do not let the government give us funds. When digital independent outlets speak up, people from old newspapers raise their concerns and all progress halts."*

Respondents also said that these bodies mediate access to the state and function as the principal gatekeeping institutions for journalist accreditation in much of Pakistan.

> *"Traditional media members of the press club oppose our budget in public advertising. They want to get maximum budget so they can continue working. They do not let us get our share in the budget. The administration has an understanding of what they do, but they can not do much."*

## Arbitrary, unrealistic eligibility criteria

Respondents also mentioned that the eligibility criteria for accessing digital advertising by the federal and provincial governments were arbitrary, unrealistic and structurally mismatched for digital-native outlets.

According to the Guidelines and Procedures 2024 of the federal government's

[12] https://pid.gov.pk/uploads/Guidelines%20and%20Procedures%20of%20Advt%20Policy.pdf

advertisement policy of 2021 (amended in 2020)[12] the eligibility criteria for digital news outlets to receive public advertising funds requires: website/portal/publisher (i) must be accessible in Pakistan without necessitating usage of VPN [virtual private networks], (ii) must have minimum monthly traffic of 200,000 originating from within Pakistan, (iii) must be integrated with Google Analytics for assessment of traffic/pageviews/users, and (iv) must be active on at least three social media platforms. These guidelines and procedures also recognize the category of "influencers" and divide them into (i) micro, (ii) general, (iii) macro and (iv) mega categories depending on their follower count.

One organization interviewed for this study operates as a platform-native, video-first outlet, with social media serving as its primary distribution channel. It does have a website, but it is not their core operational asset since the organization heavily relies on social media for content production and audience engagement. This model diverges structurally from the website-centric framework assumed by MoIB's registration criteria which requires applicants to report daily website traffic and related metrics. As a platform-native outlet, this organization does not have any substantial website engagement data to show the ministry. It does have significant social media engagement metrics which do not translate into eligibility under MoIB's current registration criteria.

> *"They had unrealistic requirements regarding numbers. The website criteria are challenging for us because we are not text based, we are a video based [platform]. Maybe that is the problem. Those who have both a strong website and social media presence might be at an advantage."*

Some of the interviewed digital media outlets, especially those operating with one to three staff members, lacked the capacity to develop their operations to the scale of comparatively larger organizations. These organizations did not have dedicated staff for website management, audience engagement or promotion to help them with visibility and attractive engagement metrics. In this context, these organizations viewed the government's uniform eligibility criteria for all natures of digital news organizations as unjust and unrealistic. They said that the set eligibility criteria did not account for their scale, scope or the challenges they face.

> *"The government is [basically] saying you will get advertisements, but you have to prove your legitimacy through a certain audience size. How can you expect a two-person team doing public interest journalism to meet this criteria? The government does not understand this kind of media or the challenges they face."*

The organization further said that the financial and technical infrastructure required to build and maintain a website to the government's standards is completely out of reach for independent public-interest startups operating on a relatively smaller scale:

> *"Yes, we are interested in government advertising. We made our website ourselves because we did not have much money. Experts wanted PKR 2 million to build it. You need a lot of people to manage a website and do SEO [search engine optimization]. How can a digital media platform build and run such a website and make it a functioning business? I think it is [a] very unrealistic [government criterion]."*

Some of the interviewed organizations had concerns that government advertising funds might affect their editorial freedom. These organizations had no interest at all in receiving digital advertising funds from the government. One organization focused on right-to-information reporting stated that it did not expect the government to fund it as its reporting would rarely serve government interests. Another outlet, which operates as a public interest information initiative of a citizens' group working on human rights, does not register with MoIB, PID or provincial bodies due to its organizational structure. It also ruled out government advertisement as an option altogether to defend its independence status and reporting focus.

Some of the organizations interviewed said that they received government advertisement funds in the past two years despite lacking formal registration with the required bodies. Their reach, engagement and existing links with government and advertising agencies made this possible, allowing for an informal understanding to bypass enforcement of eligibility criteria.

> *"We have also received federal government funds for advertising. Government gives ads to digital agencies and buying houses — if you have good understanding with them, they send you ads; otherwise not. This has happened three to four times at the federal level."*

A Karachi-based outlet said that it has a direct link with the provincial government. This link has helped it secure government advertising a couple of times in the past, but that access of this kind still requires strong references. However, it said that those funds come with payment delays that can disrupt operations of these organizations. The outlet further said that it rarely accepts government campaigns for this reason, since it cannot operate under conditions of delayed payments. Editorial independence and the tag of being called 'the state's voice' were other major concerns it had.

> *"We just get 2-3% of total revenue every month from government. We rely on other means for our revenue. Also, payments have a lot of delays, almost one year; we can't make our financial cycle dependent on government advertisement."*

Organizations also reported that legacy media takes the lion's share of government advertising funds. These large media conglomerates operate through established,

organized associations that lobby government directly. Along with that, their digital platforms already command large audiences by virtue of their larger institutional setups. Many organizations interviewed for this study noted that, regardless of their efforts, independent digital media outlets operating in country are unable to compete with even the smallest legacy media organizations in terms of operational capacity, given that the infrastructural and resource base of the smallest legacy outlet still exceeds that of the largest digital media outlet.

The legacy media groups offer government to place ads across multiple platforms at once that gives the government wider coverage for its spend.

> *"Legacy media takes a big chunk of government digital advertising funds. Most legacy media outlets have a conglomeration of print, broadcast, and digital platforms, and their setups are far bigger than any digital media organization in Pakistan. Government wants to reach the maximum number of people, and legacy media offers them that access through bundle deals. If they receive an ad for a digital platform, they run it on other platforms too."*

The organizations also expressed distrust in how the government distributes digital advertising funds. They pointed to a lack of transparency in the fund distribution process, noting that government bodies could cite arbitrary or inconsistent justifications to deny them access to advertising funds. One organization, for instance, was denied federal government advertising campaign on the ground that it was focused on a single province only, despite having audiences from across Pakistan.

> *"We are missing out on a big chunk of federal government funding. We operate in Sindh, but our audience is from all over Pakistan. We were told that the federal government focuses more on Islamabad and Punjab based organizations. But federal funding is meant for the whole country. Why only Islamabad and Punjab? Show us the criteria for how you divide the funds. There is no formula, and there are no numbers."*

## Viability: Revenue and survival strategies

If accessing public sector advertising is tough, then how do the indie public interest digital journalism platforms survive? The regulatory and advertising-access challenges mentioned above have pushed them to develop diverse, multi-pronged business models. This is a deliberate move away from direct platform dependency and the constraints of government advertisement funds currently present in Pakistan. Of those interviewed, this trend was more visible among the more developed platforms with proper structures, bigger establishments and staff.

These publishers have established business-to-business (B2B) commercial wings that generate revenue independent of government funds and platform advertising. This revenue is then used to subsidize public-interest journalism. For example, an Islamabad based outlet operates a separate commercial team that handles video content creation and social media marketing (SMM) for corporations, telecoms, diplomatic circles and international NGOs. This commercial arm now functions as the outlet's primary income source and helps to reduce its reliance on government advertising to a matter of choice rather than necessity.

> *"We have figured out how to make money out of it. We have strengthened our revenue streams, so maybe we don't feel we need government advertising. We started a service model and set up a company in 2019. We work with many INGOs and diplomatic circles. We are also doing content creation and social media management for corporate clients. That is our main source of revenue, and we use that money to fund our news operations."*

The same outlet has since expanded this model into two further revenue lines. It built a studio setup that provides production and podcasting infrastructure to external clients. It also runs an academy that offers paid media and content creation training to journalists, content creators and vloggers.

> *"We made a studio through which we provide production services to corporate clients. Now, we have added an academy too where we train journalists. We now want to train content creators and vloggers too, and provide services to podcasters."*

The Karachi based outlet also integrated commercial services like website management, video production and digital consultancy. It even signed some MoUs to manage the digital footprints of civic organizations and local law enforcement agencies. In the north, a network also runs a production house that generates revenue through specialized communications consulting, media training and knowledge management services for embassies and development bodies. These organizations also earn through direct corporate advertising. One outlet reported that corporate advertisements form the largest share of its revenue, followed by social media monetization and sporadic government campaigns.

At the smaller and more localized end, some platforms earn through direct promotional work for local businesses rather than through structured commercial wings. A KP-based outlet reported that it regularly runs paid commercial campaigns for local real estate developers, private schools and public health initiatives such as polio eradication drives.
Social media monetization opportunities – and challenges

Many organizations were also exploring social media monetization as a revenue stream. Outlets with more diversified revenue streams said that monetization was a minor supplement for them while smaller and understaffed organizations were actively trying to build it into their primary income source. Even so, they stated that it was difficult to scale since platforms such as Meta and YouTube reward entertainment content over news content and routinely restrict monetization, reach and engagement for perceived community-guideline violations.

> *"You can earn well as an influencer on social media, but not as a news media."*

There are third party technical hitches in making social media monetization a sustainable source of revenue. One interviewed outlet observed that a large viewership does not necessarily translate into meaningful income since social media platforms' algorithms make only a small fraction of that reach eligible for monetization. Wide distribution and revenue eligibility follow separate rules on most platforms, therefore, more viewership does not necessarily mean more earnings.

> *"This month our Facebook page viewership was 150 million, and out of it, 0.2 percent was eligible, so the earning out of it was low."*

Another organization reported that its first monetization payout covered little more than the cost of a pizza and two office chairs despite having a niche audience with a strong average view duration that many outlets don't have.

YouTube monetization operates through the YouTube Partner Program (YPP), which has two eligibility tiers. The first requires 500 subscribers, three public uploads in the previous 90 days and either 3,000 public watch hours in the previous 12 months or three million Shorts views in the previous 90 days. This tier unlocks fan-funding tools such as Channel Memberships, Super Chat, and Super Thanks, but not ad revenue share. For ad revenue sharing, the monetization stream most relevant to the organizations interviewed, requires the higher tier: 1,000 subscribers plus either 4,000 public watch hours in the previous 12 months or 10 million Shorts views in the previous 90 days.

Meta's monetization program similarly requires creators to meet its Partner Monetization Policies and Content Monetization Policies. Its eligibility requirements include use of a Facebook Page or Professional Mode, original content, residence in an eligible country, and specific audience or engagement thresholds. Meta also operates invite-only bonus programs tied to defined performance indicators.

Beyond low yields, the social media platforms enforce highly volatile, automated, and politically sensitive enforcement of guidelines. Many organizations said that content already compliant with a platform's policies can later be found in violation once those

policies are updated. The organizations said they have to stay alert and watch each detail of their content to keep it within the bounds of volatile platforms policies.

Organizations in KP and Balochistan reporting on violence, conflict and human rights experienced this disruption regularly. One organization received recurring monetization-restriction notices from Meta. Each time, it struggled to resolve the issue, since Meta does not offer creators access to a human representative. Whenever it tries to reach Meta, it encounters automated bots that cannot understand the local context – conflict is the most reported theme in Balochistan.

> *"Our Facebook monetization runs for two to three weeks, then it stops again. We receive a [new] notice. We are a news organization. We will break news [about conflict and violence happening] but whenever we do so, we receive a notice from Meta."*

The same organization said that Meta's fact-checking and copyright enforcement was disproportionately strict. It flagged a specific pattern during the Pakistan-India conflict when Meta's fact-checkers, whom the organization identified as largely India-based, repeatedly flagged its accurate reporting as false.

Another outlet reported restrictions on its Facebook monetization, however, having a diverse revenue base made it a lesser worry for it though it continued working to resolve the restriction directly with Facebook.

> *"Facebook has restricted our monetization. We are struggling to get in touch with them. It was something related to a post about Israel. They blocked our monetization and it has been few months now."*

This algorithmic enforcement pushes niche and human-rights-focused outlets to alter how they report, purely to protect their monetization eligibility. Organizations said that they use asterisks to obscure sensitive words that platform algorithms might flag, particularly in their reports of murder, rape and other violence-related reporting. They also said that Meta automatically reduces reach of such reports.

One respondent said that major international outlets such as CNN and BBC use the same sensitive language without triggering equivalent warnings. It further added that social media platforms calibrate content moderation differently by country. These platforms extend more editorial latitude to some markets than to others, and it is shaped by each platform's working relationships with individual governments.

## Development sector grant streams

The interviewed respondents also mentioned national and international grants and donor partnerships as another revenue model. Some outlets said that they formally registered as private limited companies with the SECP primarily to establish the legal compliance needed to qualify for international funding.

From among those interviewed for this report, a KP based outlet successfully launched and built its initial regional footprint by winning a Deutsche Welle (DW) grant for small organizations to train university journalism students. Another KP based organization said that donor-funded projects are its primary mode of getting money to run operations. It carefully utilizes these budgets and reinvests in the organization where contract terms allow. However, the same outlets also noted that relying solely on international donors was highly volatile, since project-based funding does not translate into predictable year-on-year income.

Organizations that had historically relied on national and international donor support to sustain their news operations reported that the US funding cuts triggered in 2025 and the broader global economic downturn had disrupted this funding stream. A Lahore-based outlet had been operating under a large donor grant for years. It expressed uncertainty about securing the same funding again. They linked their concern to a broader shift in donor priorities. It further noted that donors had moved away from funding projects they had previously supported.

> *"They are not giving grants for typical issues that they used to fund before. We still try to get those but those are small grants. The big grants that could help us sustain our operations are difficult to get."*

The same organization tried switching to advertising and social media monetization to compensate. But since its core focus remains reporting, it struggles to build the separate operational capacity that commercial revenue streams require.

Some organizations, still in their initial phase or yet to formalize a business model, are exploring new ways to generate revenue for their news operations. One outlet has drafted plans to package its scriptwriting and production expertise into formal media courses to sell as academic curricula to universities. Another outlet is planning to move toward a specialized subscription model, aiming to build a paywalled "data portal" that hosts public documents obtained through Right to Information (RTI) requests. They plan to provide those documents to journalists and researchers at a minimal fee.

*"We want to make a data portal, so whatever we get from government bodies, we can put there. We also want to move towards a subscription model, so people can pay to read. We have a strong reputation. If you search on Google, you will see our stories. We have authenticity as an organization. Revenue generation is our next step now."*

## Taxed without recognition or representation

The respondents of this report said that they operate in Pakistan without a defined tax category. The Income Tax Ordinance 2001[13] and the Sales Tax Act 1990[14] do not classify digital news publishing as a distinct sector in Pakistan. Publishers register as private limited companies under the Companies Act 2017 and pay tax as general service providers. Several respondents were told by their lawyers to pay tax under different categories.

*"We do not have much clarity about taxation. We add sales tax which is not specific to us. We consulted different lawyers regarding taxation. We still have no clarity on whether digital publishers have any specific taxation or not. Lawyers told us that we fall under marketing, so we pay tax accordingly."*

Provincial revenue authorities add a second layer of tax related ambiguity. The KP Revenue Authority Act 2013, the Sindh Revenue Board Act 2011, and the Punjab Revenue Authority Act 2012 govern services tax at the provincial level. These laws have categories built for hotels, restaurants and traditional service providers but none of these categories accommodate a digital publisher. Hence, some organizations did not register with the respective provincial revenue authority.

A KP based outlet needed a KPRA registration number to receive an advertising campaign from an education sector client. The organization itself was not registered with KPRA. The founder used an alternative registration instead.

*"KPRA took eight percent tax when we ran a campaign for an educational institute. My organization is not registered with KPRA. I used my co-founder's hotel registration in that particular case. To register properly with KPRA will raise new issues, lot of paper work, consultation with lawyers and lengthy bureaucratic procedures. Still, they will ask why a digital outlet needs to register as a news organization, and I do not have energy to answer that question."*

[13] https://download1.fbr.gov.pk/Docs/20267241777257051ncomeTaxOrdinanace2001.pdf
[14] https://download1.fbr.gov.pk/Docs/202671713734189515alesTaxAct1990updatedupto30.06.2026.pdf

In 2026, the government of Pakistan introduced a new withholding tax for digital and social media earnings through the Income Tax Ordinance's Section 154B[15]. It states that every banking and non-banking financial institution shall, at the time of credit or receipt of any amount in an account of a person, deduct 5% tax in case of filer and 10% in case of non-filer, where such amount represents revenues received from social media platforms.

At the time of these interviews, respondents were already getting this five percent tax on their social media earnings. Banks were applying it directly at the point of receiving the amount from social media networks. This deduction was a significant loss for publishers who were relying on social media earnings to survive.

> *"When we get money from banks, they deduct their charges and then deduct five percent tax that the government has applied on social media earnings. My bank deducted PKR 10,000 from my income. The government is not giving me 5G, but it is taking tax from me."*

A Balochistan-based organization had just received its first payout from social media monetization. Its founder said the deduction was a significant loss for the organization. It was not yet earning much from social media still both platforms and government were deducting their desired tax from it and together these taxes were taking too large a share of an already small income.

> *"I just got my first income from Facebook. The tax the government applied on freelancing applied on my earnings as well. This new five percent tax on social media income will definitely affect my organization because its Facebook page just got monetized and it is my first income through this organization. It has only just started to earn, so it will definitely have an effect."*

Social media companies also apply significant deductions to creators' revenue through their platform commission structures. YouTube retains 45 percent of net advertising revenue from long-form videos and pays creators 55 percent[16]. For Shorts, creators receive 45 percent of their allocated revenue from the Shorts pool, with YouTube retaining the remainder.

Google also applies 24% US tax withholding requirements to eligible earnings from America-based audiences[17]. Creators can submit Form W-8BEN through AdSense and provide their Pakistani tax identification details to claim applicable benefits under the US–Pakistan tax treaty. Creators without valid tax documentation face higher default withholding rates.

[15] https://download1.fbr.gov.pk/Docs/20266291261044366FinanceAct2026.pdf
[16] https://support.google.com/youtube/answer/72902
[17] https://support.google.com/youtube/answer/14727140

Pakistani banks apply local taxes and transaction charges to foreign currency payments, including withholding tax, SWIFT charges and foreign currency conversion costs, with the applicable rate depending on the creator's tax status and relevant Pakistani tax rules. These deductions significantly reduce the amount creators receive from their gross platform earnings.

Meta follows a similar approach to YouTube for US tax documentation and withholding tax rules. It does not have a single flat deduction for all creators; instead, earnings depend on the specific monetization program they are using[18]. As with YouTube earnings, Pakistani banks can apply local taxes, foreign exchange conversion costs and transaction charges when creators receive payments from Meta.

The combined effect of platform revenue shares, tax deductions, bank charges, and foreign exchange costs can substantially reduce creators' final earnings from social media monetization. The organizations that relied solely on social media monetization, or were building toward it, reported deep dissatisfaction with these policies.

> *"YouTube cuts 40 percent of our income. That is a big amount for us and the RPM [revenue per mille] is also very low. If a video is watched a hundred thousand times, we get only six dollars for that, and then more money gets deducted at payout. News content earns very little in comparison to entertainment content."*

The Income Tax Ordinance 2001 provides tax exemption for registered non-profit organizations (NGOs) under Section 100C. One of the interviewed platforms referenced this exemption directly and noted that it exists but remains difficult to access as the process to register as non-profit in Pakistan was complex and tiring for them to follow.

> *"They created tax redemptions for non-profits but the process to register as non-profit was lengthy. We do not have enough revenue to comment on these changes."*

All organizations said that they were never consulted for taxation for digital media publications. Though they want it to happen so they can share their concern with government and put their demand to draft industry specific policies.

> *"Government should have regular engagement with us. We are a case study internationally, so we must be doing something right. They should engage with us, learn from us and make policy. They should engage on advertising and taxation policy together."*

[18] https://www.facebook.com/help/1737820969853848

CHAPTER 4

# EXPECTATIONS – WHAT INDEPENDENT DIGITAL MEDIA PLATFORMS WANT

When asked for recommendations for government to improve its policies for the development of the independent digital media sector in Pakistan, the study's respondents suggested that the government should move from unilateral policymaking to real consultation to make the policies representative and practical.

For the prevalent policies, the respondents said that the respective governments did not consult the sector it aims to regulate, ignoring their presence in most regions All of the organizations interviewed for this study have built their operations and reputations in the geographical areas they have been working in. Only the governments of Gilgit-Baltistan government and Khyber Pakhtunkhwa consulted with some of the local publishers when formulating their advertising policies.

Another recommendation for the government was to introduce transparent and merit-based criteria for public advertisement funds. The respondents said these criteria must be published openly and not left to case-by-case discretion of officials. In some instances, the declared policies are hard to locate, and each digital platform is left to find its own copies from someone.

Some recommended that the eligibility checks should run through the sector's representative bodies rather than government offices, where discretion snubs merit and criteria. One respondent stressed that digital media and government need to work together to come up with sector-specific policies that actually work for the industry.

> *"We think you can't fight with government. You have to work together with it. Now when digital media industry is there, [the] government should regularize it and manage it in a better way. It should make fair policies, give the sector its fair chunk of public advertising funds, set fair eligibility criteria and make it available for the whole of Pakistan."*

Several respondents also recommended that the government should reserve some of the allocated funds for digital-native public interest journalism so that the organizations with this portfolio can sustain their operations and leave room for growth. They said that those funds should be distinct from those allocated for digital versions of legacy media and individual/influencer content.

Some respondents also recommended that the government must invest in the sector's own capacity by acknowledging its value as a public good, and particularly support those present in less-resourced or periphery regions. They urged that this engagement be institutionalized and sustained as opposed to a single arbitrary round of consultation before a policy is finalized.

CHAPTER 5

# KEY FINDINGS

This study set out to map Pakistan's advertising, revenue and taxation policy environment for independent digital news organizations, and to understand how that environment actually functions in practice. Its findings paint a consistent picture across different parts of the country, organization sizes, and years of operation. The study found that the independent digital journalism in Pakistan has grown substantially over the past decade, but the institutional framework meant to support it has not kept pace with its growth.

But before presenting the key findings and its recommendations (separate from suggestions made by the respondents) for the various stakeholders, it is important to outline the contextual basis around which these should be seen.

## Contextual position: Independent public interest journalism as a democratic public good

Independent public-interest journalism is considered the highest form of journalism because it places the citizen, rather than the state, market, party, advertiser, platform algorithm or factional interest, at the center of the information order. Its core function is guardianship of the public interest: to verify facts, reveal abuses of power, explain public policy, represent marginalized communities, scrutinize public spending and sustain democratic accountability. In this sense, journalism is not merely content production or audience aggregation; it is a civic infrastructure without which citizens cannot make informed choices, hold institutions accountable or participate meaningfully in democratic life.

This is especially true for independent digital public-interest journalism in Pakistan. These outlets often operate where legacy media has limited appetite or space due to factors that may or may not include compromises with the government in return for access to public sector advertising. Indie digital media in Pakistan often focus on issues that legacy media has been compromising on for year now: human rights, governance, public services, right-to-information reporting, minority and regional issues, conflict-affected communities, women's rights, accountability and local civic problems. Their value lies not only in their digital reach but in their editorial purpose. They expand democratic visibility by covering constituencies and concerns that are otherwise under-reported, commercially unattractive, politically sensitive, or geographically peripheral.

For this reason, public policy – including availability of public sector advertising for digital media – should treat independent public-interest journalism as a public good. Public advertising should not be understood only as a transactional purchase of impressions, clicks, followers or campaign visibility. It should also be a legitimate instrument for sustaining plural, credible and independent information ecosystems, provided it is allocated through transparent, fair, non-discriminatory and editorially

neutral rules. When public advertising is distributed without recognizing the democratic value of journalism, it risks becoming either a patronage tool or a market subsidy for the already powerful rather than a mechanism for strengthening citizens' right to reliable information.

Independent digital media should ideally not depend on government advertising as its principal source of revenue because its primary democratic task is to scrutinize government performance against the benchmark of the state's constitutional and democratic duties. A newsroom whose survival depends substantially on official advertising risks weakening its watchdog role, diluting criticism, or being perceived as vulnerable to political pressure. Independence therefore requires diversified revenue streams that allow public-interest journalism to examine government, public institutions and elected officials without fear of financial retaliation.

At the same time, access to public-sector advertising funds can be justified if these funds are understood correctly: they are taxpayer resources, not political funds belonging to any government, ruling party or ministries. Their legitimate purpose is not to reward favorable coverage, build political loyalty or subsidize influence, but to serve citizens through effective public communication and to strengthen public-interest journalism as a democratic public good. Like anywhere else, independent digital journalism in Pakistan needs resources to remain viable, especially in markets where platform monetization, commercial advertising and donor funding are volatile or insufficient.

These two apparently opposing positions can be reconciled only through advertising and taxation policies based on representation, transparency and fairness. Representation means that independent digital publishers, regional outlets, women-led platforms, minority-language media and public-interest newsrooms participate meaningfully in policy design. Transparency means that eligibility criteria, allocations, rates, rejections, payments and appeals are published and auditable. Fairness means that public-interest journalism is assessed not merely by traffic or followers, but also by editorial credibility, public-service value, regional relevance and contribution to democratic accountability. Under such safeguards, public advertising can support journalism without compromising its independence.

It is against this distinction that the subsequent recommendations should be seen.

## The Report's key findings

**1. A fundamental disconnect exists between governments and Pakistan's digital public-interest media:** Federal and provincial policies acknowledge "digital media" nominally, but they do not sufficiently understand the diversity of digital-native journalism, including video-first outlets, social-first newsrooms, local public-interest

platforms, regional-language journalism, and small investigative or civic journalism initiatives.

**2. Digital journalism in Pakistan has recognition without institutional accommodation:** The digital media advertisement policies provide registration portals and eligibility references, but the wider state system still lacks a clear legal, regulatory, taxation and administrative category for digital-native news organizations. This leaves outlets registered as companies, partnerships, marketing entities or unrelated service providers rather than as news organizations.

**3. Public-interest journalism in Pakistan is not formally recognized as a distinct democratic value:** Current frameworks mostly measure digital media through traffic, followers, subscribers, daily sessions, campaign delivery, prior brand work and technical infrastructure. They rarely reward public-interest reporting, editorial standards, community relevance, accountability journalism, investigative work, local-language service, or coverage of marginalized communities.

**4. Government advertising frameworks in Pakistan confuse journalism with influence:** Most policies place independent digital publishers, influencers, bloggers, vloggers, advertising agencies and content creators within the same broad policy universe. This collapses the distinction between journalism as a democratic function and content creation as commercial communication, entertainment or personality-driven influence.

**5. Eligibility thresholds are often unrealistic for independent journalism in Pakistan:** High traffic, follower, subscriber, office, staffing, SEO, liquidity and prior-client requirements privilege large legacy media, agencies and influencers. Smaller public-interest digital media outlets, which may be editorially strong but financially lean, are structurally excluded before even they can compete.

**6. Access to relevant authorities in Pakistan for digital media is shaped by opacity and informal power:** Respondents reported non-responsiveness from official registration systems, lack of application tracking, closed or unclear enlistment processes, dependence on references and discretionary access through agencies or personal networks. This weakens trust in policy and encourages patronage over merit.

**7. Legacy media in Pakistan retains structural advantage over indie digital media:** Even where digital advertising is formally recognized, legacy media conglomerates dominate because they offer bundled reach across print, broadcast and digital assets, benefit from long-standing associations and possess institutional familiarity with government systems.

**8. Payment delays by authorities undermine sustainability:** Even when independent digital media outlets receive public campaigns, delayed payments weaken cash flow and make government advertising unreliable as a survival mechanism. For small newsrooms, delayed reimbursement can be more damaging than non-allocation because it creates operational risk.

**9. Pakistani taxation reinforces the recognition gap:** Digital newsrooms are taxed as general service providers, marketing businesses or social media earners, but they are not recognized as public-interest journalism entities. The state therefore extracts revenue from the sector without providing matching recognition, clarity, incentives or support.

**10. The digital media sector remains willing to engage constructively:** Despite mistrust and difficult experiences, respondents do not reject regulation or public support. They ask for fair consultation, transparent eligibility, published criteria, standardized categories, realistic rates, editorial safeguards, and recognition of independent journalism as a democratic public good.

CHAPTER 6

# KEY RECOMMENDATIONS

## REPRESENTIVE POLICIES: Recommendations for fairer, representative and consultative digital media advertising policies:

1. **Create mandatory multi-stakeholder consultation mechanisms:** Federal and provincial governments and other regional authorities should establish annual digital media policy forums that include independent digital newsrooms, regional and local publishers, women-led outlets, minority-language platforms, journalists' unions, digital rights organizations, advertising professionals, taxation authorities and information departments.

2. **Publish all policies, criteria, procedures and decisions online:** Every government should mandatorily maintain a public digital advertising portal containing eligibility rules, application status, approved outlets, campaign allocations, rates, payment dates, rejection reasons and appeals procedures.

3. **Separate public-interest journalism from influencer marketing:** The digital media advertising policies should create distinct categories for digital news publishers, public-interest journalism outlets, digital versions of legacy media, influencers, content creators, agencies and production houses, with separate eligibility, compensation rules and reserved funds for each.

4. **Establish independent advisory committees:** Allocation frameworks should be reviewed by committees including government officials and independent sector representatives with conflict-of-interest disclosures and published minutes.

5. **Introduce transparent appeal and grievance mechanisms:** Digital media outlets denied registration, enlistment, allocation or payment should have access to time-bound review processes with written reasons and predictable remedies.

## STANDARDIZED POLICIES: Recommendations for standardization of digital media and content categories and compensation rates:

1. **Adopt a nationally harmonized taxonomy:** Federal, provincial and regional governments should use academically accepted definitions for digital news publisher, digital-native public-interest outlet, legacy-media digital platform, video news platform, regional-language platform, influencer, content creator, advertising agency and production houses.

2. **Use differentiated eligibility tiers:** Small, medium and large digital newsrooms should be assessed according to their scale, staffing, region, language, format and

editorial purpose rather than through one-size-fits-all traffic thresholds that go in favor of larger outlets, especially those of legacy media groups.

3. **Standardize rate bands while allowing regional adjustment:** CPM, CPD, video-view, sponsored-content and campaign-package rates should be benchmarked nationally but adjusted for provincial/regional markets, language reach, production costs and underserved regions.

4. **Recognize qualitative value in rate-setting:** Compensation should account for editorial credibility, public-interest output, local relevance, original reporting, community trust and verified engagement rather than only raw traffic or followers.

5. **Cap agency deductions and ensure direct payment options:** Public campaigns should not depend solely on buying houses or agencies. Registered digital public-interest outlets should be able to contract directly with government departments, with clear payment timelines.

6. **Introduce prompt-payment rules:** Payments should be completed within a fixed period, preferably 30 to 60 days after verified campaign delivery, with automatic escalation and penalties for unjustified delay.

## REWARDING PROFESSIONALISM: Recommendations for linking public advertising to public interest journalism:

1. **Create a protected public-interest journalism allocation:** A defined share of federal, provincial and regional digital advertising budgets should be reserved for independent digital-native public-interest journalism, separate from legacy media digital arms, influencers and commercial content creators.

2. **Develop a public-interest journalism scorecard:** The eligibility criteria of receiving advertising fund should include evidence of original reporting, editorial policy, corrections practice, public-service coverage, transparency of ownership, geographic relevance, inclusion of marginalized communities and adherence to professional ethics. This criteria should be set and measured by protocols defined by an independent group of journalists, academics, and media practitioners.

3. **Reward democratic value, not only audience scale:** Government campaigns should recognize outlets that provide credible information to underserved communities, even when their audience size is smaller than entertainment-oriented or personality-driven platforms.

4. **Protect editorial independence:** Public advertising must never require favorable

coverage, suppression of criticism, political alignment, editorial approval or unofficial obligations. Contracts should explicitly state that advertising support does not affect editorial independence.

5. **Support regional and local information needs:** Special weight should be given to public-interest outlets serving Balochistan, Gilgit-Baltistan, Khyber Pakhtunkhwa, Sindh's non-metropolitan districts, southern Punjab, minority-language communities, women's audiences and other underserved communities.

6. **Link tax clarity with public good recognition:** Digital public-interest journalism should receive a defined tax category, simplified compliance pathway and possible relief or rebates for reinvestment in original reporting, newsroom staff, safety, training and audience-service infrastructure.

# ANNEXURES

# ANNEX A: PARTICIPANT CONSENT FORM

***Study title:*** **Mapping and Evaluating Pakistan's Digital Media Policy Framework: A Qualitative Study of Independent Digital News Startups**

Hello,

This IRADA led and IMS supported study examines the revenue models, regulatory environment and taxation framework affecting independent digital news organizations in Pakistan to develop an understanding of founders' experiences and inform recommendations for the sector's sustainability.

You will be asked to (1) complete a short organizational profile questionnaire (10-15 minutes) and (2) take part in a semi-structured online interview (45-60 minutes) about your outlet's revenue model, regulatory experience, taxation and views on government advertising and policy. With your permission, the interview will be audio-recorded for accurate transcription; you may decline recording and still participate.

Participation in this research is entirely voluntary. You may skip any question and withdraw at any time without giving a reason or facing any consequence. You may request your data be excluded up until findings are finalized for publication.

The collected data will be used for preparations of this research report. It will be stored with the organization, accessed only by the research team and deleted once no longer needed for analysis.

The results may be used in an academic paper, research report or policy brief.
In case you have any questions, you can reach out to undersigned.

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# ANNEX B

1. **What is the name of your outlet? ***
2. **In which year was the outlet founded? ***
3. **In which province or territory is the outlet primarily based? ***
   a. Islamabad Capital Territory
   b. Punjab
   c. Sindh
   d. Khyber Pakhtunkhwa
   e. Balochistan
   f. Azad Jammu and Kashmir
   g. Gilgit Baltistan
   h. Other: _____

4. **Which platform(s) does the outlet publish on? (Check all that apply.) ***
   a. YouTube
   b. Facebook
   c. Instagram
   d. TikTok
   e. X
   f. LinkedIn
   g. Newsletter
   h. Other: _____

5. **What is the current legal structure of the outlet? ***

   a. Private limited company
   b. Association of Persons (AOP) / partnership
   c. Sole proprietorship
   d. Non-profit
   e. Informal / not yet legally registered
   f. Other: _____

6. **Is the outlet registered with the Securities and Exchange Commission of Pakistan (SECP)? ***

   a. Yes
   b. No

7. **If yes, in which year did the outlet register with SECP?**

8. **Is the outlet registered with a provincial body (e.g., Registrar of Firms or any other body, for a partnership/AOP structure)? ***

    a. Yes
    b. No

9. **If yes, in which year did the outlet register with this provincial body, and which body was it?**

10. **Which of the following revenue sources applied to the outlet in the past 12 months? (Check all that apply.) ***

    a. Display / programmatic advertising (e.g., Google AdSense on website)
    b. Government advertisement
    c. Direct-sold sponsorships / brand deals
    d. Native or sponsored content
    e. Subscriptions or membership fees
    f. Reader donations / crowdfunding
    g. Grants or donor funding (local)
    h. Grants or donor funding (foreign/international)
    i. Social Media Platform monetization (e.g., YouTube Partner Program, Facebook adshare)
    j. Consulting or training services
    k. Content syndication or licensing
    l. Events (ticketed or sponsored)
    m. Other: _____

11. **Of the sources checked above, which ONE would you say generates the most revenue for your outlet?**

12. **What is the outlet's approximate total annual revenue?**

    a. No revenue
    b. Under PKR 1 million
    c. PKR 1–5 million
    d. PKR 5–15 million
    e. PKR 15–50 million
    f. Above PKR 50 million
    g. Prefer not to disclose

13. **Is the outlet registered with the Federal Board of Revenue (has an NTN)? ***

    a. Yes
    b. No

14. **If yes, in which year did the outlet register with FBR?**

15. **Is the outlet on FBR's Active Taxpayer List (i.e., a regular filer)? ***

    a. Yes
    b. No

16. **Is the outlet registered with a provincial revenue authority for sales tax on services (e.g., PRA, SRB, KPRA, or the ICT tax-on-services regime)? ***

    a. Yes
    b. No

17. **If yes, in which year did the outlet register, and with which authority?**

18. **Is the outlet enlisted with the Ministry of Information and Broadcasting for government advertising eligibility? ***

    a. Yes
    b. No

19. **If yes, in which year did the outlet enlist?**

20. **Is the outlet enlisted with the Press Information Department (PID) for government advertising eligibility? ***

    a. Yes
    b. No

21. **If yes, in which year did the outlet enlist?**

22. **Has the outlet received any government advertisement (federal or provincial) in the past 2 years? ***

    a. Yes
    b. No

# ANNEX C

## Interview Guide

Thank you for taking part in the interview Let us check that you have signed the consent form and filled the questionnaire. Can we audio record the interview?

1. What made you start this organization? What is your editorial policy today? How has it changed since you started?
2. Walk me through your registration process. Which bodies did you register with in Pakistan and why? What steps did the process involve? What challenges did you face at each step?
3. How has your revenue mix changed over time? Which revenue streams worked best for you? Why did they work? Which streams did not work well?
4. Does your outlet receive foreign or local grant funding? How is that funding structured? What conditions come with it? What reporting does it require? Has it created regulatory problems with the donor? Has it created regulatory problems in Pakistan?
5. What has your experience been with regulatory bodies like FBR, provincial revenue authorities, PEMRA and PTA? Have you faced audits, notices, queries, or disputes and how were they resolved?
6. How well do you understand which taxes apply to your revenue streams? Where do you feel confident and where does it feel unclear or ambiguous? Has this ever led to something you would call double taxation, or confusion over which tax regime applies?
7. How do you feel your organization is classified for tax and regulatory purposes, whether as a media business, an IT or IT enabled service, or something else? Does that classification feel appropriate to you?
8. Have you tried to access government digital advertising support? Walk me through that process and describe what success or difficulty you have encountered.
9. How have digital media regulations in Pakistan changed since you started your organization? How have tax policies changed? How have those changes actually affected your operations, your revenue, or decisions like expansion, scaling back, or even considering shutting down?
10. Have you or your organization ever been consulted, formally or informally, by government bodies when digital media policies or tax rules were being developed? What was that experience like if so? If not, do you feel there is space for that kind of input?
11. What would you say is the single biggest regulatory or policy related obstacle to running your organization sustainably today?
12. How would you describe the broader experience of independent digital journalists and outlets in Pakistan as they navigate these regulations? What kind of support do

you think the sector actually needs from government?

13. Are journalist associations, press clubs, or media bodies working together on these challenges?
14. If you could recommend one or two changes to how government treats independent digital news organizations, whether in taxation, advertising access, registration, or anything else, what would they be?

Thank you for your participation.

# IRADA

IRADA is a registered civil society organization aiming to advance democratic transformation through Law, Information, and Technology.

We work to strengthen fundamental freedoms, including freedom of expression, access to information, political and ecological rights, and cultural inclusion.

Our approach combines research, advocacy, and capacity-building to catalyze participatory reforms and enable citizens' equitable access to justice, technology, and knowledge.


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