

04 August 2023

His Excellency Mr. Shehbaz Sharif,
Prime Minister of Pakistan,
Prime Minister's Office, Islamabad, Islamabad Capital Territory

Dear Prime Minister Sharif,

On behalf of the Asia Internet Coalition (AIC) and its members, we want to express our deep concern about the potential tabling of Personal Data Protection Bill(PDPB), E-Safety Authority Bill and upcoming amendments to the Prevention of Electronic Crimes Act (PECA) and the Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards) Rules (RBUOC).

Amidst the prevailing economic challenges confronting the nation, it is imperative that economic recovery, policy certainty, and predictability be prioritized to foster investor trust and commitment to Pakistan. Regrettably, the Asia Internet Coalition (AIC) members find cause for significant concern in the opaque process through which these laws are set to be passed in Pakistan. The initial reassurances of extensive and broad-based consultation, particularly from the Minister of Law and Justice, Minister of Information Technology and Telecommunication, the Foreign Minister and the Special Assistant to the Prime Minister, have not materialized, leaving us deeply alarmed. Despite promises of forward-looking governance and a willingness to address stakeholders' concerns, the actual consultation process has proven neither credible nor transparent. This has completely eroded investor trust as they grapple with significant legislative uncertainty. Additionally, the speed with which these legislations are being rushed is causing international companies to re-evaluate their willingness to operate in the country.

As an industry association, AIC strongly believes in the potential for multi-stakeholder dialogue to shape policies and legislation to foster innovation and technological advancement. However, the proposed legislation will severely cripple the growth of Pakistan's digital economy. AIC Members recognize Pakistan's strong potential, but this sudden announcement belies the Government of Pakistan's claims that it is open for business and investment. In fact, the legislations and rules as currently written would make it difficult for AIC Members to make their services available to Pakistani users and businesses.

In its current state, Pakistan risks becoming a global outlier, needlessly isolating and depriving Pakistani users and businesses from the growth potential of the internet economy.

Mr. Prime Minister, we know that you share our vision of a dynamic digital economic ecosystem for Pakistan, where platforms such as those of our members continue to drive substantial economic growth. To fulfill this vision and to ensure that Pakistan becomes a lucrative destination for technology investment and achieve its digital transformation objectives, we earnestly call upon the Government to collaborate with the industry in establishing practical and transparent regulations that preserve the advantages of the internet while balancing the interest of the country. The Asia Internet Coalition (AIC) and its members have consistently extended offers to engage in this partnership, and we reiterate our unwavering commitment to this endeavor. Together, we can foster an environment that encourages innovation, investment, and progress in the digital landscape, benefitting both

the nation and its citizens. We also wish to highlight that the AIC is not against regulation but we believe that the legislation must address crucial issues such as internationally recognized rights to privacy and individual expression. Doing otherwise would derail the efforts that your government and the ICT industry have painstakingly invested in for many years.

Our Secretariat, Mr. Sarthak Luthra, would be happy to answer any questions your office may have. He can be reached at mobile +65 8739 1490 or via email at Secretariat@aicasia.org.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Paine".

Jeff Paine
Managing Director
Asia Internet Coalition (AIC)

CC:

- Mr. Azam Nazeer Tarar Federal Minister for Law and Justice
- Mr. Syed Amin Ul Haque Minister of Information Technology & Telecommunication
- Mr. Bilawal Bhutto Zardari, Minister of Foreign Affairs
- Syed Naveed Qamar, Federal Minister for Commerce
- Mr. Mian Riaz Hussain Pirzada, Federal Minister for Human Rights
- Major General (R) Hafeez Ur Rehman, Chairman, Pakistan Telecommunication Authority (PTA)
- Mr. Fahad Haroon Aziz, Special Assistant to the Prime Minister

Asia Internet Coalition (AIC) members

