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PUBLIC INTEREST JOURNALISM IN PAKISTAN: A CRITICAL ANALYSIS OF PAKISTAN ELECTRONIC MEDIA REGULATORY AUTHORTY (PEMRA)

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Abstract
Public interest journalism serves as a cornerstone of democratic societies by fostering informed citizenry and promoting accountability, yet in Pakistan its practice remains constrained by political influence, commercial imperatives, and regulatory inconsistencies. This study employs an exploratory qualitative research design to examine the role of the Pakistan Electronic Media Regulatory Authority (PEMRA) in shaping journalistic ethics and freedom. Data were collected through fifteen semi-structured interviews with media professionals and regulatory officials. Using manual thematic analysis following Braun and Clarke's (2006) framework, six principal themes were identified, reflecting the structural, institutional, and ethical dimensions of media regulation. The findings demonstrate that although PEMRA's regulatory framework is designed to uphold ethical broadcasting, its enforcement is uneven and frequently influenced by political and market pressures. Journalists reported weak institutional autonomy, insufficient protection mechanisms, and limited capacity-building opportunities, leading to diminished trust and self-censorship. The study concludes that strengthening regulatory independence, enhancing participatory policymaking, and ensuring equitable capacity development are essential to advancing democratic and accountable media governance in Pakistan.

INTRODUCTION

Public interest journalism is widely regarded as a cornerstone of democratic life, enabling citizens to make informed decisions, holding power to account, and facilitating inclusive debate.

The primary purpose of journalism is to provide citizens with the information they need to be free and self-governing." *Kovach & Rosenstiel (2014).*

Scholars emphasize that its democratic value lies not only in the provision of information but in ensuring that such information is credible, varied, and accessible to diverse publics (Christians et al., 2009; Fenton, 2021; Napoli, 2019).

At the core of public interest journalism is a normative commitment to the collective good, typically framed as accountability, transparency and rights-protection (Pickard 2020; Mansell 2015). But these ideals are under siege. Market logics, political interventionism as well as technological disruption are creating new frames

of reference for journalism (Kleis Nielsen & Fletcher 2022; Trappel 2021).

The regulatory environment plays a decisive role in shaping whether journalism can fulfill these functions.

In mature democracies, strong independent regulators balance free media with accountability and in the process safeguard pluralism, diversity and ethics (Freedman, 2014; Lunt & Livingstone, 2012).

In developed countries such as the United Kingdom, media regulators like Ofcom combine statutory independence with transparent procedures, ensuring legitimacy and public trust (Tambini, 2020). In transitional democracies, however, regulatory bodies often operate within politicized environments, where autonomy is fragile and the idea of "public interest" is at times manipulated to justify censorship or protect elite interests (Rao & Johansson, 2019; Wasserman, 2020).

Pakistan represents a revealing case. Since the liberalization of broadcast media in 2002, dozens of private television channels have transformed the country's information landscape (Siraj, 2009; Riaz, 2019).

Establishing the Pakistan Electronic Media Regulatory Authority (PEMRA) reportedly marked one of the significant moves towards reform and professionalization of regulation, fostering competition and advancement of public interest. (Khan, & Aziz, 2021).

PEMRA's statutory functions stress that the authority has purposes for "informing, educating and entertaining people" in addition to protecting public interest, morals and decency in society and state interests. But two decades later the regulator remains contested. It had also been condemned for being neither an independent custodian of public interest nor an anti-politician or anti-elitist and selectively bandying rules to shield who it championed (Ali, 2018; Shah, 2023).

These challenges are not unique. Across transitional democracies, regulatory authorities grapple with autonomy, accountability, and legitimacy. In India, regulators face accusations of capture, with censorship justified in the name of order or national security (Thakurta, 2012; Rao & Johansson, 2019). In South Africa, the constitution guarantees press freedom but also there is regulator challenges when it comes to resisting political pressure proving words on a paper were not enough protection without any practical meaning (Wasserman, 2020). As other studies also revealed, a comparison of experiences makes clear that institutional design and political culture have influenced when regulation is more or less likely to favour democratic communication over discriminatory measures (Carpentier 2011; Voltmer, 2013; Fenton, 2021).

On the theoretical front, scholars have been arguing between Public Interest Theory and Social Responsibility Theory. Within the public interest theory, regulators are to correct market imperfections and promote the collective well-being. Through these, diversity and availability would be guaranteed for valuable content (Posner 1974; Baldwin, Cave & Lodge, 2012). SRT emphasizes the two-faced nature of media freedom as child of truth, justice (and at a time, parent to inclusion) too (Siebert et al., 1956; Christians et al., 2009). They are normative and career counselors. But they are not enough in brittle political orders. Recent writings about regulatory capture and institutional independence describe how political and economic agents "capture" regulation, making it depend on who the regulator is rather than what it does (Carpenter & Moss, 2014; Ayres & Braithwaite, 2020; Fenton, 2021).

Despite the importance of these debates, research on Pakistan's media regulation remains fragmented. It is empirically limited, focusing on legal frameworks rather than lived experiences of regulators and practitioners (Yusuf, 2017; Ali, 2018). It is theoretically shrill, infrequently integrating PIT, SRT, and capture perspectives. And it is comparatively underdeveloped, with few efforts to situate Pakistan within global debates. As a result, we lack grounded insight into how regulation is enacted and contested in everyday practice.

This study addresses these gaps by combining theoretical and empirical perspectives. Drawing on qualitative interviews with journalists, editors, and PEMRA officials, it examines how regulation is defined, enforced, and experienced. It situates

these findings within PIT and SRT while also drawing on capture theory to explain the disconnect between formal mandates and practice. This approach pushes out our conceptual understanding of public interest journalism in transitional democracies by examining the cocktail of political, commercial and institutional pressures.

The contributions of this study are threefold. In practice, weaves in a regulator and practitioner view of PEMRA to reveal the real picture. Theoretically, it is a challenge for normative models in capture environments and proposes instead an alarmed one that focuses on autonomy and power. Instead, it situates Pakistan in the global conversation and highlights commonalities with transitional, rather than consolidated forms of democracy. Ultimately, PEMRA is an institution that aims to regulate in the "public interest", yet its operations tend favor political and market elites over citizens. In situating Pakistan within a broader framework of scholarly literature, this research has underscored the urgency with which reimagining regulation in transitional democracies poses more than average stakes for public interest journalism.

Literature Review

The regulation of media has historically been shaped by normative theories that attempt to balance freedom of expression with the requirements of democratic society. Two of the perhaps most famous theoretical frameworks, Public Interest Theory (PIT) and Social Responsibility Theory (SRT), can be regarded as such; they try to tell us why regulation is needed and how accountability should work in practice.

Public Interest Theory contends that regulation emerges to counteract market failures and protect public interests (Posner, 1974; Baldwin et al., 2012). Within the media sector, the theory has indeed justified state intervention to protect citizens from monopolies and ensure variety and vigorous debate in democracy (Napoli, 2019; Pickard, 2020). There has been much research about regulators such as Ofcom in the UK and the extent to which they can compel public interest obligations through licensing, content standards, and universal service (see Tambini 2020; Freedman 2014).). Critics argue that PIT presupposes an institutional neutrality/good faith which rarely prevails in transitional democracies, where the political elite often subverts or undermines attempts to regulate by agencies (Rao & Johansson, 2019; Wasserman, 2020). Then there is fact that the digital age has utterly transformed the landscape upon which PIT operates. As algorithmic gatekeeping and platform monopolization practices spread, new justifications for regulation are invoked to address disinformation, global platform hegemony, and threats to national sovereignty (Nielsen & Fletcher 2023; Napoli 2019).

Additionally, Social Responsibility Theory complements PIT by shifting the focus away from the regulators to those in media practice. Having emerged from the Hutchins Commission and subsequently expressed in Siebert, Peterson & Schramm's Four Theory of the Press (Siebert et al. 1956), social responsibility theory suggests that media freedom entails duties to society including truth telling, fairness and acknowledging pluralism (Christians et al., 2009). It frames the profession of journalism to have moral responsibilities, such as holding power accountable (as watchdogs), allowing a diversity of voices and maintaining informed discussion among citizens in democracy (McQuail, 2010; Fenton, 2021). However, as contemporary scholar argue, market pressures could lead news organizations to exaggeration and their tabloidization hollowing these norms in place (Pickard, 2019; Raza, Saeed & Ali 2022). In Pakistan, journalists face the additional constraints of censorship, harassment, and threats of violence, making the realization of social responsibility particularly difficult (Shah, 2023; Freedom House, 2021). The digital transformation has also extended SRT into new domains, where obligations now include addressing online misinformation, ensuring algorithmic accountability, and promoting equitable digital access (Napoli, 2019; Nielsen & Fletcher, 2023).

While PIT and SRT provide helpful normative counsel, they fail to explain how regulation

operates in practice, especially in fragile democracies. This has led scholars to pay an increasing attention to the role played by accountability frameworks in assessing regulatory performance. Accountability as context-dependent dialectic Boven's (2007) defines accountability as a dynamic relationship between the normative principles of action and the duty to account for receipt and use of resources in an appropriate forum, which can subsequently judge performance. Schliemann's (2011) goes a bit further by defining accountability as multi-dimensional: on the up-side, regulators are expected to be accountable towards political authorities, on the down-side towards the public, in horizontally direction for peer organizations and civil society actors or diagonally against independent and international watchdogs. Busuioc and Schliemann's (2014: 88-9) propose that good regulation involves the balancing of independence with accountability, such that regulators need to be protected from interference but also kept responsible in relation to democratic principles.

In the Pakistani case, this multi-dimensional framework is particularly salient. PEMRA is formally answerable upward to parliament and the judiciary, downward to citizens and media audiences, horizontally to industry actors and civil society, and diagonally to oversight bodies and international organizations. Yet, as critics note, these mechanisms do not operate evenly: upward accountability often dominates, while downward and horizontal mechanisms remain weakly institutionalized (Riaz, 2019; Khan & Aziz, 2021).

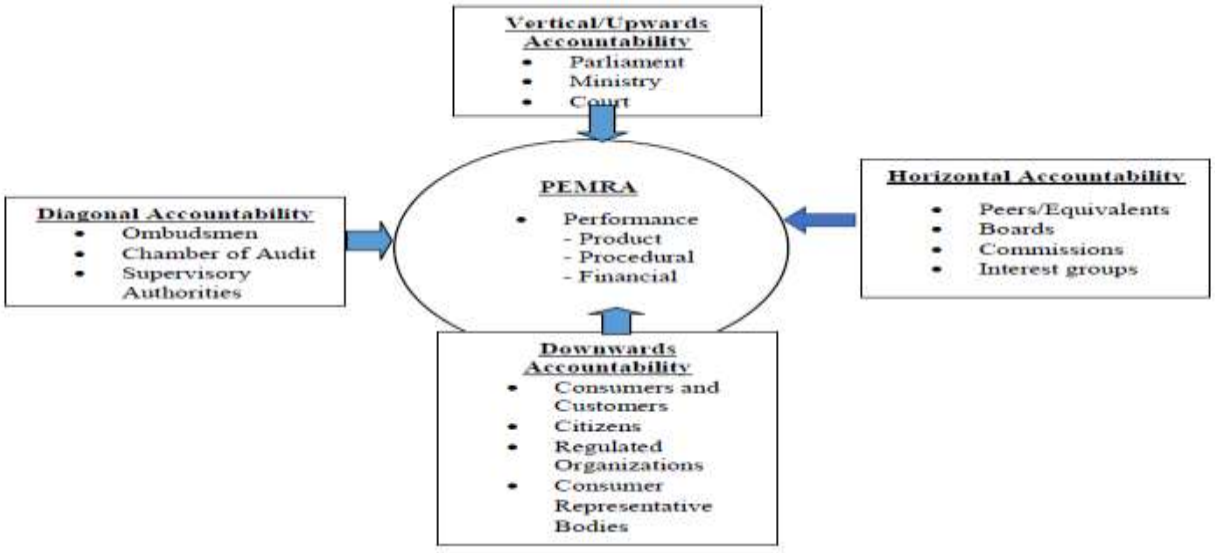


Figure 1: Accountability Regime of Pakistan Electronic Media Regulatory Authority (PEMRA)

Comparative analysis also draws attention to occasional under-performance of democracy's accountability regimes. In the UK, Ofcom demonstrates how statutory independence can be reconciled with appropriate forms of accountability through parliamentary scrutiny, public consultations and judicial review (Tambini 2020; Freedman 2014). However, in India the regulators are usually perceived as an arm of political authority and that does not make its legitimacy stronger or both downward and horizontal accountability weaker (Rao & Johansson, 2019). Apartheid-era governments have been replaced, but the will to scrutinize press freedom and keep governments in check is as feeble and inconsistent (Wasserman, 2020). Turkey and Kenya are two further case studies of contested regulation in which political divisions, coupled with "authoritarian tendencies," hinder the ability of regulators to "combine autonomy from political interference with accountability" (Yesil 2014: Yellow Page 3; Voltmer 2013).

These comparative experiences vibrate strongly with Pakistan's regulatory trajectory. PEMRA's established in 2002 was heralded as a step toward liberalizing the broadcasting sector, and the authority has overseen a rapid expansion of private television channels, contributing to greater media diversity (Gul, Obaid, & Ali, 2017). But enforcement has been criticized as random and selective, with critics noting that sanctions have primarily targeted independent media (Shah 2023). Although PEMRA is formally rooted within multiple lines of accountability, its decision-making processes remain impervious, limiting downward accountability to citizens and horizontal accountability to professional organizations (Khan & Aziz, 2021). Being exposed to such pressures, the increasing level of commercialization in the media markets has injected sensationalist content as well and this is what PEMRA could not regulate despite its numerous efforts The trends explained above coupled with a lack of focus on training for journalists (the professional body of journalism has also critical role here), leads civil society organizations and organizations representing journalists to request reforms that make more arms-length the regulator from political intervention, which successive governments have refused preferring rather focusing on maintaining political control over it (Shah 2023).

Taken together, the literature reveals several gaps. First, and secondly in the wake of PIT and SRT is not that an account of what accountability mechanisms are like as they operate in real-life is provided in transitional democracies. Second, although comparative cases highlight the importance of independence and accountability, Pakistan is rarely positioned within these global debates, leaving its regulatory experience under-theorized internationally. Finally, the existing literature is predominantly descriptive in the sense that it is based on legal regulations or normative in character and lacks an empirical grounding provided by practitioners. This paper seeks to redress this gap by drawing on theoretical insights and qualitative evidence (on the basis of interviews with elite/non-elite actors in combination with textually analyzing documents) to investigate how PEMRA translates the duties of public interest into formal policy. In the meantime, it locates Pakistan's experience within broader discourses of media regulation and accountability that stimulate local reform while challenging comparative theory.

Methodology

This study adopts a qualitative method to observe how the Pakistan Electronic Media Regulatory Authority (PEMRA) interprets and enforces its accountability. A qualitative approach was adopted because the research questions address meanings, perceptions, and experiences, which are best to discovered through depth rather than measurement (Creswell & Poth, 2018; Tracy, 2010). By focusing on the accounts of journalists, editors, and regulatory officials, the study provides insight into how regulatory frameworks are enacted in daily practice and how accountability is understood by those directly affected.

Data were gathered through the semi-structured interviews and after that employed the thematic analysis. Interviews allowed for both standardization and flexibility, while a common set of themes guided the conversations, participants were encouraged to elaborate on their own experiences with PEMRA. It also facilitated investigation of the elements about regulatory independence, equality and responsiveness that could also have been suppressed under more formalistic methodological frameworks (Bryman, 2016).

A purposive sampling approach was equally applied to ensure that all respondents who directly involved with PEMRA were covered in the study. Attendees were journalists based in public and private media, senior editors and regulatory organizations. There were fifteen interviews in all.

Table 3.1: Demographic details

Participant ID	Department	Position	Experience	Education	Gender
Interview-1	PEMRA	Ex. DG	20 Years	PHD	Male
Interview-2	PEMRA	Legal Advisor	18 years	Master	Male
Interview-3	PEMRA	Compliance Officer	15 years	Master	Male
Interview-4	PEMRA	Director of Communication	18 years	MPhil	Male
Interview-5	PEMRA	AD Legal	12 years	Master	Female
Interview-6	Journalism	Senior Political Journalist	22 years	Master	Male
Interview-7	Journalism	Investigative Journalist	18 years	Master	Male
Interview-8	Journalism	Senior TV Anchor	23 years	Master	Male
Interview-9	Journalism	Media Coordinator	15 Years	Master	Male
Interview-10	Journalism	Senior Investigative Reporter	16 Years	Master	Female
Interview-11	Journalism	News Editor	12 Years	MA Eng	Male
Interview-12	Journalism	Political Analyst	22 Years	MPhil	Male
Interview-13	Journalism	Senior Investigative Journalist	15 Years	Master	Male
Interview-14	Journalism	TV Host and Journalist	12 Years	MA Journalism	Male
Interview-15	Journalism	Senior News Anchor	20 years	MPhil	Male

Thematic analysis (Braun & Clarke, 2006) was used to analyses the data. Code was integrated from deductive group indicators (upward, downward, horizontal and diagonal) of the accountability framework with inductive themes that emerged from the transcripts. The analysis was recursive: it involved multiple stages of coding and cross-analysis between interviews and documentary sources to ensure validity in the categories. This approach permitted us to reveal patterns of how accountability is problematized as a legal principle in texts and how it was enacted.

Several methods were used to increase trustworthiness of the research. Through cross-checking information across interviews and with the documents, the interview data were not exclusively generated on one source basis (Flick, 2018). ' Validation of interpretation was sought through 'member checking with a subset of participants' and ' an audit trail, whereby decisions around data analysis were recorded as part of the

process and context of inquiry' (Tracy, 2010). Together, they enhanced the trustworthiness and credibility of the analysis.

Thematic Analysis

Based on a relatively limited amount of qualitative depth data (collected from fifteen semi-structured interviews), this study thematically analyzed regulatory practices at PEMRA and their implications for public interest journalism in Pakistan. After transcription, the interview data were read multiple times, and line-by-line coding was performed to identify salient patterns and recurring concepts. Codes of conceptual similarity were grouped into sub-themes, which ultimately converged into six main themes reflecting the structural, ethical, and operational dimensions of media regulation. Manual coding was adopted to ensure interpretative engagement with participants' perspectives and to remain closely grounded in the data (Braun & Clarke, 2006). The first theme, Regulatory Framework and Public Interest Journalism, reflects varying perceptions of PEMRA's mandate and effectiveness. While officials emphasized that regulation ensures responsible journalism, respondents from media organizations viewed the framework as inconsistently applied and vulnerable to political influence. They cited selective enforcement, ambiguous guidelines, and limited transparency as factors undermining public trust. The theme thus highlights a structural gap between regulatory intent and its translation into fair practice. The second theme, Balancing Public Interest and Commercial Pressures, captures the tension between journalistic ethics and profit-oriented operations. Participants acknowledged that reliance on advertising and corporate sponsorship constrains editorial independence. In pursuit of ratings, media outlets often prioritize entertainment or political publicity over civic-oriented reporting. Such commercial imperatives divert attention from social responsibility and diminish the media's watchdog role, reinforcing global concerns about the commercialization of news (McChesney, 2015).

The third theme, Effectiveness of PEMRA's Enforcement Mechanisms, examines perceptions of enforcement capacity and procedural fairness. Journalists described PEMRA's actions as reactive rather than preventive, with penalties and warnings perceived as arbitrary. Some officials admitted that enforcement is often influenced by external pressures, diluting regulatory credibility. The absence of independent review or appeal mechanisms further weakens institutional accountability, limiting the authority's capacity to uphold ethical standards consistently.

The fourth theme, Barriers to Public Interest Journalism, identifies multiple constraints—political, structural, and financial—that obstruct independent reporting. Respondents pointed to political interference, ownership concentration, and economic insecurity as major impediments. Self-censorship, driven by fear of backlash or job loss, reduces critical coverage and narrows the scope of public discourse. Collectively, these barriers contribute to a media environment where journalistic autonomy is heavily compromised.

The fifth theme, Journalist Protection and Safety, underscores the precarious conditions under which journalists operate. Participants recounted threats, intimidation, and a lack of institutional support when reporting on sensitive issues. Many viewed PEMRA's silence on such incidents as complicity or institutional weakness. The absence of coordinated safety frameworks and the persistence of impunity reinforce a culture of fear, constraining freedom of expression and investigative journalism in Pakistan (UNESCO, 2021).

Finally, the sixth theme, Capacity Building and Compliance Awareness, emphasizes the need for continuous professional development and inclusivity in regulatory outreach. Although PEMRA officials highlighted various training programs, journalists noted uneven access—particularly for smaller regional outlets. Limited awareness of regulatory procedures fosters miscommunication and mistrust. Respondents called for transparent, consultative mechanisms and sustained capacity-building efforts to strengthen compliance and ethical practice across the media sector.

Table 1. Illustration of Thematic Development

Raw Data Extract	Initial Codes	Subthemes	Final Themes
"We receive notices mostly when we criticize the government."	Political pressure; selective enforcement	Political interference in regulation	Political Influence and Control Mechanisms
"Smaller channels can't survive without sponsors, so they avoid sensitive issues."	Commercial dependency; self-censorship	Market-driven journalism	Commercialization and Ownership Pressure
"We're rarely consulted when new policies are introduced."	Lack of consultation; policy exclusion	Transparency and inclusivity	Regulatory Framework and Enforcement Gaps
"Reporters fear job loss for investigating corruption."	Job insecurity; editorial pressure	Professional autonomy and safety	Journalist Safety and Freedom of Expression
"Sometimes ethical standards are compromised for higher ratings."	Sensationalism; compromised ethics	Decline in journalistic standards	Ethical and Professional Dilemmas in Journalism
"Social media gives us space to discuss stories mainstream channels ignore."	Digital alternatives; new platforms	Shift toward digital watchdog journalism	Evolving Digital Media and Future Regulatory Challenges

This refined analysis demonstrates how the data were systematically transformed from raw interview material into analytically meaningful themes, maintaining coherence between participants' experiences and the broader theoretical framework of public interest and social responsibility in journalism.

Findings

The interviews and documentary analysis reveal a striking gap between PEMRA's formal accountability framework and the way regulation is experienced by practitioners. Though the authority is supposed to reconcile upwards downward, horizontal and diagonal lines of accountability, in practice upwards lines dominate and other mechanisms are weak or implemented less consistently (Riaz 2019; Khan & Aziz 2021).

Regardless of the contents of their packets, all participants emphasized that politics drives enforcement. Several journalists said sanctions were often used to punish critical channels, but not those who provided welcoming coverage. Indeed, said one senior editor: *"The PEMRA says it works on the public's behalf, but its job is to serve the government. If they criticize, get notes; if they bolster the narrative get left alone".* The selective application is also reported as has been observed by Shah (2023). Downward accountability to citizens was also limited. Despite the fact that one of PEMRA's codes of conduct demands respect for viewers' rights and public interest not a single person we interviewed, felt that people had any real avenues to influence decisions. *"The public are supposed to be prominent in regulation, but ordinary people have no voice,"* said a broadcast journalist. *"No open consultation, no genuine feedback loop. It's a top-down authority."* This is corroborated by the discourse of the civil society on this subject, which suggests that PEMRA barely holds consultative and transparent processes (Freedom House, 2021).

Horizontal accountability through peer institutions and industrial associations, in particular, is portrayed as largely gesture. Journalists' organizations and professional councils issued statements, but interviewees stressed those seldom influenced the outcome. *"Our unions are doing statements after the statement but PEMRA doesn't have ears," said a producer. They are drones who take orders from above."* Raza, Saeed and Ali (2022), proposed that professional bodies

remain peripheral within the regulatory system in Pakistan.

Diagonal accountability, potentially exercised by independent watchdogs or international organizations, was also weak. While groups such as Reporters Without Borders and Freedom House regularly document assaults on press freedoms, participants said these tend to have little impact on PEMRA's actions. *"We read these foreign reports, but they do not change our instructions. Government orders, PEMRA follows."* This might indicate broader patterns in the weak impact of external monitoring on semi-democratic regimes (cf. Voltmer, 2013; Wasserman, 2020).

Table 1 summarizes the contrast between PEMRA's formal accountability framework and its observed practices, highlighting the imbalance across the four lines of accountability.

Line of Accountability	Formal Framework	Observed Practice (Findings)
Upward (to parliament, courts, government)	PEMRA is legally bound to answer to parliament and judiciary; intended to safeguard independence through constitutional oversight.	Dominates regulatory practice; sanctions and decisions frequently align with government priorities, undermining neutrality.
Downward (to citizens and audiences)	Codes of conduct emphasize protecting viewers' rights and public interest.	Citizens have little meaningful input; no consistent consultation mechanisms; decisions announced top-down.
Horizontal (to industry bodies, journalist associations, peer institutions)	Professional bodies and media councils formally recognized as stakeholders.	Largely ignored in practice; associations' statements rarely influence outcomes; perceived as symbolic.
Diagonal (to independent watchdogs, international organizations)	Oversight by NGOs and international monitors (e.g., Freedom House, RSF) acknowledged.	Reports widely circulated but carry little practical weight; no change in PEMRA's operational decisions.

Commercial pressures compounded these accountability weaknesses. Many journalists described how competition for advertising revenue incentivized sensationalism and weakened professional standards. PEMRA's enforcement of ethical codes was seen as inconsistent, with some broadcasters targeted and others ignored. As one editor explained, *"The real issue is the market. Channels will do anything for ratings, and PEMRA has no consistent policy to control it."* This dynamic has also been observed in previous studies of Pakistan's media sector (Gul, Obaid, & Ali, 2017; Pickard, 2019).

Discussion

The findings reveal that while PEMRA is formally structured to embody multiple lines of accountability, in practice upward accountability to political authorities dominates, leaving downward, horizontal, and diagonal mechanisms comparatively weak. This imbalance has significant implications for understanding regulation through the lenses of Public Interest Theory (PIT), Social Responsibility Theory (SRT), and accountability frameworks.

The Public Interest Theory holds that regulators exist for the general welfare of a society by correcting markets failures and ensuring plural hints of information (Posner, 1974; Napoli, 2019). But the case evidence offered here indicates that

in Pakistan, regulation is often politics more than wider public good. The perception of journalists that PEMRA rewards selectively errant networks reinforces how political capture undercuts public centered logic (Shah, 2023). Instead of acting as a "neutral judge" that consolidates and does not question claims to pluralism, PEMRA's orientation towards upward accountability links it with the state authority and puts in risqué the belief by PIT that institutional independence is taken as granted, which might not be true for fledgling, emerging democracies (Rao & Johansson, 2019).

Responsibility in Social Responsibility Theory, it is not just a responsibility for media structures, but also for regulators whose responsibility is to ensure fair, truthful and pluralist contents (Siebert et al., 1956; McQuail, 2010). But the research suggests this responsibility is not well policed. Low vertical accountability annihilates the role of citizens in framing media regulation, and rather than consistent enforcement of journalistic codes many arenas are left open for commercial imperatives to lead news content (Raza 41Saeed pp.3-4Ali p.2) towards sensationalism). So too is the lack of bargaining power for professional associations in contrast to the focus on self-regulation and professional ethics in SRT. These fiascoes highlight the challenge of establishing social responsibility as a systematic feature in communities with little autonomy and credibility even from authorities.

This is captured more explicitly in the accountability model. As Bovens (2007) and Schillemans (2011) have observed, effective accountability functions simultaneously at multiple levels—upward, downward, horizontal and diagonal. However, in the Pakistani case there is no such balance: upward accountability dominates, while others are underdeveloped. Thisresults in a regime that ostensibly respects various communities but -in reality- serves political power. As Busuioc and Schillemans (2014) argue, regulators are at risk of becoming instruments of government rather than defenders of the public interest through excessive upward accountability at the expense of other lines.

Comparative perspectives reinforce this interpretation. In the UK, however Ofcom highlights how accountability can become institutionalised in three dimensions at once (Tambini 2021) as an overlap of parliamentary oversight, public consultation and judicial review that combine independence with responsiveness. In India and Turkey, they are politically captured – a situation in which there is preference for upward accountability at the expense of other powers which leads to selective enforcement and loss of trust (Yesil 2014; Rao & Johansson, 2019). An intermediate example applies to South Africa where strong constitutional protections on paper combined with political pressures reveal both the promise and limitations of accountability regimes in transitional democracies (Wasserman, 2020).

Table 2 Pakistan's accountability regime within global regulatory experiences.

Country	Upward Accountability	Downward Accountability	Horizontal Accountability	Diagonal Accountability
United Kingdom (Ofcom)	Strong parliamentary oversight; judicial review ensures independence.	Regular public consultations and open hearings.	Engagement with professional bodies and industry groups institutionalized.	Limited but present through EU directives (pre-Brexit).
India	High political influence over regulators; selective enforcement common.	Weak citizen participation; decisions often top-down.	Professional bodies exist but with limited influence.	Minimal role for external watchdogs.

Country	Upward Accountability	Downward Accountability	Horizontal Accountability	Diagonal Accountability
South Africa	Regulatory independence protected constitutionally but subject to political pressure.	Citizens and NGOs play active roles in consultations.	Media councils and unions influential in shaping policy.	International watchdogs actively monitor, some influence observed.
Turkey	Regulators widely seen as politically captured; strong upward accountability to government.	Citizens marginalized from regulatory processes.	Professional associations sidelined.	International monitoring has little domestic effect.
Pakistan (PEMRA)	Dominant upward accountability to government and judiciary; selective enforcement common.	Citizens lack structured consultation mechanisms.	Professional bodies marginalized; little institutional voice.	International monitoring symbolic, with no operational impact.

With respect to comparative observations, Pakistan fall on a continuum of country cases that are similar to India and Turkey, where regulators are weakened form political dominance, as opposed to UK where multi-layered systems of accountability have some efficacy. A second, more nuanced case has arisen in South Africa. It still remains perilously in balance but also, as it were, fragile and underscores that a constitutionally protected moral norm can create room for accountability even under pressure. That said, the trajectory of Pakistan serves as a reminder that without reforms to impose downward, horizontal and diagonal accountability mechanisms PEMRA is bound to remain more a weapon in the hands of those who have weaponized their political power!

Recommendations

The results can help guide interventions that may increase accountability of media control in Pakistan.

Institutionalize public consultation mechanisms.

The PEMRA should devise formal means for enabling the citizenry, as well as stakeholders to be a part of the law-making process (open public hearings, request for comments and online consultation portal). They would be a step towards greater downward accountability, and are closer to what happens internationally as part of that standard (Tambini 2021; Freedom House 2021).

Empower professional associations and industry bodies.

Journalist, editor and broadcaster unions and councils must hold formal advisory/oversight roles in PEMRA-related decisions. This would enhance the horizontal accountability and create a shared burden in the media industry (Raza, Saeed, & Ali, 2022).

Enhance transparency and consistency in enforcement.

Regulatory processes (permissions and sanctions) are required to be made public and the audiences should be given explanation/ justifications in details as per a well-defined standard procedure. Transparent enforcement practices would lead to reduction in the notions of selective enforcement and also serve to reinforce PEMRA's regulatory legitimacy (Shah, 2023; Napoli, 2019).

Strengthen diagonal accountability through international collaboration.

PEMRA could engage with international watchdogs, regional regulatory clusters as well as standard global best practices to reform itself in line with democratic standards of media freedom

and pluralism. Not only would such partnership work to strengthen diagonal accountability vis-à-vis extraterritorial executive control; it would also signal to global norms of media governance that Pakistan is committed to playing by the rules (Wasserman 2020; Nielsen & Fletcher 2023).

Together, the recommendations aim to recalibrate PEMRA accountability culture, and reduce political influence, enhance openness and increased engagement on part of all stakeholders. The reforms will go a long way towards realizing a more credible, independent and democratic media-regulatory environment in Pakistan.

Conclusion

This study examined the accountability regime of the Pakistan Electronic Media Regulatory Authority (PEMRA), situating its practice within broader theoretical and comparative debates. The findings demonstrate that although PEMRA is formally designed to balance upward, downward, horizontal, and diagonal lines of accountability, in practice upward accountability to political authorities dominates, producing selective enforcement, limited transparency, and low public trust (Shah, 2023; Riaz, 2019).

Theoretically, at least in ideal-type form, they suggest that the Public Interest Theory and Social Responsibility Theory remain applicable to guide consideration of normative mandate (Siebert et al., 1956; McQuail, 2010; Napoli, 2019), but do not adequately consider regulatory practice in transitional democracies. The accountability structure offers a more robust lens for understanding the patchy behaviour of parallel chains of accountability and in making clear how political steamrolling corrupts the independence (Bovens 2007; Schillemans 2011; Busuioc and Schillemans 2014).

In more practical terms, the research shows a sense of urgency to achieve balance in PEMRA's accountability level. The design of citizen consultative process promoting downwards accountability, empowering professional associations for horizontal accountability to be imposed and enhancing the role of civil society and international watchdogs would result in more credible regulatory environment (Freedom House, 2021; Raza et al., 2022). Without these changes, PEMRA is liable to continue being dominated for political ends – rather than acting as an indendent champion of the public good.

Lastly, the analysis indicates the importance to include a practitioner side in the research on regulatory institutions. This could, in theory, be extended by comparative work in more than one transitioning democracy (Wasserman, 2020; Rao & Johansson, 2019) or focusing on the latest transformative process—the power of digital platforms and how they re-shape accountability systems (Nielsen & Fletcher, 2023).

References

Baldwin, R., Cave, M., & Lodge, M. (2012). *Understanding regulation: Theory, strategy, and practice* (2nd ed.). Oxford University Press.

Bovens, M. (2007). Analysing and assessing accountability: A conceptual framework. *European Law Journal, 13*(4), 447–468. https://doi.org/10.1111/j.1468-0386.2007.00378.x

Bowen, G. A. (2009). Document analysis as a qualitative research method. *Qualitative Research Journal, 9*(2), 27–40. https://doi.org/10.3316/QRJ0902027

Braun, V., & Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology, 3*(2), 77–101. https://doi.org/10.1191/1478088706qp063oa

Bryman, A. (2016). *Social research methods* (5th ed.). Oxford University Press.

Busuioc, M., & Schillemans, T. (2014). Introduction: Accountability in public organizations. *European Journal of Political Research, 53*(1), 1–7. https://doi.org/10.1111/1475-6765.12048

Christians, C. G., Glasser, T., McQuail, D., Nordenstreng, K., & White, R. (2009). *Normative theories of the media: Journalism in democratic societies*. University of Illinois Press.

Creswell, J. W., & Poth, C. N. (2018). *Qualitative inquiry and research design: Choosing among five approaches* (4th ed.). Sage.

Etikan, I., Musa, S. A., & Alkassim, R. S. (2016). Comparison of convenience sampling and purposive sampling. *American Journal of Theoretical and Applied Statistics, 5*(1), 1–4. https://doi.org/10.11648/j.ajtas.20160501.11

Fenton, N. (2021). *Media freedom in the age of citizen journalism*. Polity.

Flick, U. (2018). *An introduction to qualitative research* (6th ed.). Sage.

Freedom House. (2021). *Freedom in the World 2021: Pakistan*. Freedom House. https://freedomhouse.org/country/pakistan/freedom-world/2021

Freedman, D. (2014). *The contradictions of media power*. Bloomsbury.

Gul, R., Obaid, A., & Ali, S. (2017). Media regulation in Pakistan: The role of PEMRA. *Pakistan Journal of Communication and Media Studies, 5*(2), 45–60.

Khan, A., & Aziz, F. (2021). Political interference and media regulation in Pakistan: A study of PEMRA. *Journal of South Asian Studies, 36*(1), 89–105.

McQuail, D. (2010). *McQuail's mass communication theory* (6th ed.). Sage.

Napoli, P. M. (2019). *Social media and the public interest: Media regulation in the disinformation age*. Columbia University Press. https://doi.org/10.7312/napo18454

Nielsen, R. K., & Fletcher, R. (2023). Democratic implications of news on platforms. *Journalism, 24*(1), 3–20. https://doi.org/10.1177/14648849221125423

Pickard, V. (2019). The battle for democracy in the disinformation age. *Journal of International Affairs, 73*(1), 177–186.

Pickard, V. (2020). *Democracy without journalism? Confronting the misinformation society*. Oxford University Press. https://doi.org/10.1093/oso/9780190946753.001.0001

Posner, R. A. (1974). Theories of economic regulation. *The Bell Journal of Economics and Management Science, 5*(2), 335–358. https://doi.org/10.2307/3003113

Rao, S., & Johansson, S. (2019). Media regulation in India: Between control and autonomy. *Global Media and Communication, 15*(3), 289–306. https://doi.org/10.1177/1742766519870956

Raza, M. R., Saeed, S., & Ali, K. (2022). Market pressures and news sensationalism in Pakistan. *Asian Journal of Communication, 32*(5), 405–421. https://doi.org/10.1080/01292986.2022.2081547

Riaz, S. (2019). Media, politics and regulation in Pakistan. *Asian Affairs, 50*(2), 245–263. https://doi.org/10.1080/03068374.2019.1602384

Schillemans, T. (2011). Does horizontal accountability work? Evaluating potential remedies for the accountability deficit of agencies. *Administration & Society, 43*(4), 387–416. https://doi.org/10.1177/0095399711412931

Shah, A. (2023). Media regulation and political control in Pakistan: An assessment of PEMRA. *South Asian Journal of Policy and Governance, 47*(1), 55–73.

Siebert, F. S., Peterson, T., & Schramm, W. (1956). *Four theories of the press: The authoritarian, libertarian, social responsibility, and Soviet communist concepts of what the press should be and do*. University of Illinois Press.

Tambini, D. (2021). A theory of media freedom. *Journal of Media Law, 13*(2), 135–152. https://doi.org/10.1080/17577632.2021.1992128

Tracy, S. J. (2010). Qualitative quality: Eight "big-tent" criteria for excellent qualitative research. *Qualitative Inquiry, 16*(10), 837–851. https://doi.org/10.1177/1077800410383121

Voltmer, K. (2013). *The media in transitional democracies*. Polity.

Wasserman, H. (2020). The state of South African media: A space to contest democracy. *Publizistik*, *65*(3), 451–465. https://doi.org/10.1007/s11616-020-00594-4

Yesil, B. (2014). Press censorship in Turkey: Networks of state power, commercial pressures, and self-censorship. *Communication, Culture & Critique*, *7*(2), 154–173. https://doi.org/10.1111/cccr.12044

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