



February 21, 2025

RE: Pakistan AI Action Plan

Via email at feedback.naip@moitt.gov.pk

On behalf of the [Digital Governance Asia](#) (DGA)[1] community, we commend Pakistan's comprehensive National AI Policy and its focus on leveraging AI for national development.

The emphasis on data, skills, infrastructure, research and development, and public awareness reflects a practical approach to fostering an AI ecosystem in the national interest. DGA is a non-profit organization with a mission to bring diverse stakeholders from the broader Asia-Pacific region together to address the challenges and opportunities in governance of emerging digital technologies, including e-commerce, social media, artificial intelligence, and other algorithmic systems from a perspective rooted in agency and insights of the diverse Indo-Pacific region, focused on the Global Majority. Based on our values of connection, understanding, and justice, our vision is a region that thrives through sustainable digital opportunities, rights, and innovation.

Our comments are based on fast-moving regional and global policy best practices as compiled and analyzed in our newsletter, Asia AI Policy Monitor. We are staffed by the experts at the non-profit management advisory [APAC GATES](#), based in Taiwan.

Specifically, we praise the National AI Policy focus on AI regulatory governance, market enablement, and skills and workforce development. We note that special emphasis should be placed on:

- AI environmental impacts and the need for green compute;[2]
- Intellectual Property (IP) gaps in data governance to protect Pakistan's publishing, news, and creative industries; and
- AI cybersecurity and deepfakes protections that ameliorate disinformation, and abuse of rights to likeness, or facilitate fraud, scams, and gender-based violence through non-consensual imagery.

[1] APAC GATES serves as the secretariat for DGA. For more information, visit www.apacgates.com.

[2] Note efforts on this in Singapore: <https://www.imda.gov.sg/how-we-can-help/green-dc-roadmap>.

Our key recommendations are as follow:

AI Policy & Governance

- Establish an AI Safety Institute (AISi) to conduct risk assessments, regulatory research, and AI governance development and participate in international networks of AI Safety Institutes.[3]
- Introduce a Digital Bill of Rights to ensure transparency, privacy, and fairness in AI systems, following models like South Korea's.[4]
- Encourage public-private partnerships to foster AI innovation while maintaining regulatory oversight, in particular focusing on associations and certifications tailored to the Pakistan context.
- Strengthen cross-border AI policy collaborations, in particular on data trust, such as the Data Free Flow with Trust.[5]
- Address intellectual property concerns in AI training data, ensuring fair compensation for local creatives and data ownership protections by directing the Intellectual Property Office to issue copyright and AI training guidance and performing education initiatives to foster commercial licensing of mutual value to the AI and creative industries.[6]
- Establish mechanisms for AI harm reporting and remediation, drawing from initiatives like the AI Incident Database or the Asia Pacific AI Harm Remedy Tracker.[7]

AI & Economic Development

- Avoid over-concentration on the AI industry due to “hype-cycle” risks, instead focusing on targeted investments in high-impact AI applications, and prevent the opportunity costs for directing funds unnecessarily to AI projects where other priorities may be needed.
- Promote AI skills development in practical, industry-relevant areas beyond AI programming, ensuring a diverse AI-ready workforce.

AI, Labor & Workforce Protections

- Protect workers from excessive AI monitoring and algorithmic management abuses by setting ethical AI labor guidelines.
- Implement inclusive AI literacy programs targeting marginalized communities, including rural populations, women, and the elderly.

[3] <https://ised-isde.canada.ca/site/ised/en/international-network-ai-safety-institutes-mission-statement>

[4] [https://www.msit.go.kr/eng/bbs/view.do?sCode=eng&mId=4&mPid=2&pageIndex=&bbsSeqNo=42&nttSeqNo=878&searchOpt=ALL&searchTxt=#:-:text=In%20the%20first%20chapter%2C%20the,3\)%20Building%20a%20safe%20and](https://www.msit.go.kr/eng/bbs/view.do?sCode=eng&mId=4&mPid=2&pageIndex=&bbsSeqNo=42&nttSeqNo=878&searchOpt=ALL&searchTxt=#:-:text=In%20the%20first%20chapter%2C%20the,3)%20Building%20a%20safe%20and)

<https://www.oecd.org/en/about/programmes/data-free-flow-with-trust.html>

[6] <https://www.techpolicy.press/ai-training-and-copyright-infringement-solutions-from-asia/>

[7] <https://digitalgovernance.asia/ai-harm-remedy-tracker>

AI & Environmental Sustainability

- Promote green AI infrastructure by investing in energy-efficient data centers and AI computing platforms.
- Ensure AI-driven digital expansion does not increase energy or water burdens on local communities.
- Incentivize environmentally responsible AI R&D to mitigate negative externalities from large-scale AI deployments.

AI & Public Engagement

- Combat AI-driven disinformation by leveraging public awareness campaigns and fact-checking initiatives.
- Integrate AI ethics education into national curricula through collaborations with universities, law schools, and public institutions.
- Encourage interactive AI learning tools, such as Pakistan's own version of Malaysia's "AI Untuk Rakyat" initiative.[8]

AI & Security, Rule of Law, and Democracy

- Mandate red-teaming exercises and AI audits to identify biases, human rights risks, and systemic discrimination, in particular through private sector third-party service providers or associations and civil society.
- Ensure AI decision-making transparency in public services, with clear human oversight and public accountability.
- Strengthen cybersecurity frameworks for AI infrastructure, particularly addressing cross-border AI-driven cyber threats.
- Implement safeguards against AI-fueled electoral manipulation and disinformation.

Please do not hesitate to contact our Director, Mr. Seth Hays, at seth@apacgates.com for any further questions, or consider joining the [Asia AI Governance and Policy Center of Excellence](#) community on LinkedIn.

[8] <https://www.mydigital.gov.my/ai-untuk-rakyat/>