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THE SOVEREIGN'S DILEMMA: PLATFORM GOVERNANCE AND DIGITAL SOVEREIGNTY FROM A GLOBAL SOUTH PERSPECTIVE



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Abstract

The prevailing academic discussion of platform governance has been largely structured around the opposing paradigm of the American free-speech framework and the European regulatory framework. This dualistic construct, however, does not capture the complexities of the realities and particular issues of the Global South. As hypothesized in this paper, a radical change in thinking is necessary to create a more globally relevant conceptualization of platform governance, including shifting the emphasis towards the sovereign issues of post-colonial states. Using Pakistan as a focus case study, we explore the ways in which concerns of national security, political stability, and compliance with religious-cultural norms often override Western principles of unregulated expression. This paper, in its initial stage, questions the prevailing Western paradigms using a critical literature review. It then dismantles these paradigms by applying a Global South perspective to elucidate individual cases of platform-state confrontation in Pakistan. Our study is a part of this ongoing discourse since it suggests a more comparative, culturally-sensitive, and context-focused approach to research by proposing a decolonized research agenda. The aim of this work is to overcome a Eurocentric focus, and advocate a pluralistic approach enhancing the global perspective of digital sovereignty in the increasingly connected world.

Keywords: Platform Governance; Digital Sovereignty; Global South; Pakistan; Content Moderation; Post-colonial Theory; Techno-nationalism; Internet Governance.

1. Introduction: The New Governors and the Sovereign State

In the modern digital environment, social platforms like Meta, Google, X, and TikTok have become de facto regulators of global speech (Ashraf et al., 2022). It is a dramatic change in terms of governance in which the processes of control and content moderation are increasingly determined by corporate organizations, rather than sovereign states. This fact generates a central conflict: these powerful platforms work within the frameworks, created in Silicon Valley, which do not always coincide with the legal, political, and cultural priorities of the countries with radically different contexts and values.

The scholarly literature of platform governance has mostly not considered the multi-faceted nature of these relationships through the lens of the Global South. Recent debates are largely structured in terms of a Euro-American dichotomy between an American free-speech paradigm and a European regulatory paradigm. This strategy fails to adequately focus on a plethora of local challenges and priorities faced by countries such as Pakistan. The widely presented narratives, as Pakistani scholars we believe, leave the discussion impoverished since voices and experiences of the Global South are sidelined.

The purpose of this paper is to illuminate these issues and propose a critical review of the platform governance paradigms, with a focus on Pakistan. In this case, national security, political stability, and cultural norms tend to dictate the governance policies which diverge significantly from the values of unregulated expression that are promoted in the West. The study roadmap involves a preliminary analysis of the hegemonic Western paradigms, a Global South critical analysis, and the promotion of a new research agenda with a more pluralistic perspective of digital sovereignty. Such reframing is necessary, as recent literature emphasizes this concept and scholars discuss digital sovereignty in various contexts (Tretter, 2022), describe data sovereignty at the level of national law (Hummel et al., 2021), and examine its impact on geopolitics (König, 2022). Such an inquiry will uncover how different governance structures manifest different priorities and how the sovereignty of post-colonial nations is usually left unchallenged, thus adding a decolonized approach to the global discourse. This strategy is strongly informed by post-colonial critiques of globalized power relations that resonate with the works by scholars such as Edward Said (1978) and Gayatri Spivak (1988) who emphasize the long-term effects of colonialism on the present-day global political and knowledge processes, calling on the need to re-centre the marginalized voices.

2. The Dominant Paradigm: The American and European Models of Platform Governance

Both scholars and the general public have recently shown interest in the governance of digital platforms (Naeem, Khan, & Khaliq, 2020).

). This section outlines the two defining paradigms that have come to dominate the discussion within this domain.

Therefore, to provide the context for later critical evaluation, the American laissez-faire model and the European regulatory model will be discussed first.

2.1. The American Laissez-Faire Model: From Self-Regulation to Scrutiny

The American platform governance model, which is based on the First Amendment and Section 230 of the Communications Decency Act, has historically favored a hands-off approach. Particularly Section 230 provides immunity to internet platforms against liability over third-party material which, at the dawn of its creation, was meant to promote online innovation but it is currently facing renewed scrutiny due to its encouragement of proliferation of harmful speech (Gillespie, 2018). This laissez-faire approach permits platforms a great deal of freedom to control their own content without strict government regulation, on the basis of the marketplace of ideas, which thrives on the free flow of ideas. Nonetheless, this self-governing paradigm has become the subject of extensive criticism following the proliferation of false information and hate speech that casts significant doubts on the responsibility of the platforms with an unparalleled amount of power to sway the discourse (Gruszka & Böhm, 2022; Rahman et al., 2023). Provided recent instances, including the fight against COVID-19 misinformation that has identified the shortcomings of an exclusively laissez-faire approach to addressing a societal health crisis (Broniatowski et al., 2023), the failure to resolve the dilemma between corporate freedom and social accountability.

2.2. The European Regulatory Model: The "Brussels Effect" in the Digital Sphere

Quite to the contrary, the European Union has adopted a proactive regulatory system, sometimes known as the Brussels Effect. An example of this approach is the General Data Protection Regulation (GDPR) and the Digital Services Act (DSA) that seek to strengthen the rights of the users, hold platforms accountable, and increase transparency (Blasio and Selva, 2021). The GDPR has outlined high data protection standards, whereas the DSA can force platforms to conduct risk assessments and deal proactively with any harmful content (Helberger, 2020; Riom, 2024). Such a regulatory landscape is indicative of an increasingly recognized position of power platforms as gatekeepers of information. The DSA has implications that go beyond the European continent, which has urged multinational platforms to make adjustments to their protocols worldwide and has established a standard of digital governance, that may lead to impacts on regulatory frameworks far beyond Europe itself.

The two paradigms are a clear view of two different approaches that have brought to the fore a global conversation regarding the position of technology in the society. This is especially concerning to the countries of the Global South, who demand a system of governance that embodies their cultural and political reality. It is important to understand these dominant models to examine a more global representative framework to which we now make the turn.

3. The Sovereign's Dilemma: A Pakistani Perspective on Platform Governance

This part critiques the dominant discourse of the West by presenting a more globally applicable perspective based on the specifics of Pakistan. This section illustrates the platform governance in Pakistan as fundamentally different when compared to the Western concerns on individual expression and privacy by analyzing the national priorities of the security and social stability in Pakistan. The dilemma of the Sovereign here means the deep struggle of post-colonial nations such as Pakistan to assert its national sovereignty and cultural norms on global operating digital platforms, which tend to follow alternative regulatory ideologies and corporate priorities.

3.1. Beyond Speech and Privacy: The Primacy of National Security and Social Harmony

Digital platforms in Pakistan are managed using entirely different priorities. To the Pakistani governments, the freedom of individual expression is usually subordinated to the priorities of collective stability and national security. This is demonstrated in the strict controlling of various sensitive content categories. Such a way of governing, where the state values collective order over personal freedoms in the digital age, echoes different theories of state control and media management common in instances where national growth and unity are the most important (Mughal, 2017).

- **Religious Content:** This is one of the most controversial areas especially concerning the laws against blasphemy. Given that perceived blasphemy potentially provoking populist anger, platforms must adhere to the local regulations that place social solidarity over the freedom of speech (Gorwa et al., 2020). The

Prevention of Electronic Crimes Act (PECA) of 2016 in Pakistan is an example, which contains clauses against blasphemy and provides the government with a substantial authority to request content removal and punish a person on the basis of online speech that is considered to be offending to religious feelings (Khan and Khan, 2020). This is a pressing dilemma for platforms that must navigate a balance between Global free speech guidelines and local regulatory requirements.

- **National Security:** The state has been greatly influenced by nationalistic feelings in its digital content with regard to the military, local civil wars such as Kashmir, and separatist groups. The preference of national security over unfiltered discourse is indicative of a profound ideological difference between Western and Pakistani government systems. In an example, posts that criticize the military or are believed to encourage secessionist activities in such places as Balochistan are regularly removed, which often leads to a short-term blocking of the platforms or a considerable amount of pressure on technological organizations (Jamal, 2021).
- **Political Stability:** The state is also concerned with ensuring political stability through taming dissent that is seen to be a threat to the ruling elite. In this respect, platforms are likely to be anticipated to conform to state power that is contrary to Western principles of accountability and transparency. Internet blocks and social media bans are frequent methods used by the state to regulate the flow of information and suppress protests during unstable political moments or elections and indicate the strong priority of political order (Freedom House, 2023).

3.2. Platform Power and Post-Colonial Sensitivities: The Case of Content Moderation in Pakistan

Global platforms do not exist in a vacuum, they engage in the preexisting and complex national media ecosystem (Asghar et al., 2019). In the case of journalism in Pakistan, its historic role has been closely connected to the political progress of the state, which influenced the expectations of the population on the role of media (Siraj & Hussain, 2016). This is an important context to platform-state tensions.

This tension is evident on the big political occasions, including the Panama Papers leaks. Whereas the leaks were framed according to the particular national political implications in the Pakistani newspapers, as it is reported by Siraj and Waheed (2019), the content moderators of the global platform, working in a different cultural framework and legal setting, may have a completely different interpretation of the similar content produced by the users. Such a deviation may result in moderation choices that appear capricious or politically partisan in a localist vein, an aspect that has been dubbed by some researchers as the natural politics of content moderation (Vinhos & Bastos, 2024). These discrepancies contribute to tension and bring to the fore ethical aspects of global content moderation policies which do not take into account post-colonial sensibilities, causing greater distrust in both platforms and the state. The described dynamic highlights one of the problems of a digital colonialism, in which powerful technological firms, which are often based in the Global North, enforce their norms and systems upon the former colonized countries, recreating old power imbalances unintentionally (Coudry and Mejias, 2019). The politics of governance in Pakistan therefore presents a complex terrain in which national security, social harmony and political stability are the major concern and thus the need to have a redefined and localised approach to the governance of platforms.

4. Forging a Decolonized Research Agenda

It is imperative to transition from critique to constructive propositions. This section suggests some of the research directions that are not limited to the Western-centric dichotomy. This decolonized research agenda aims to disrupt the epistemic infrastructures of privileging Western conceptualizations of digital rights and governance, in line with the demand for methodological pluralism and localised global knowledge production by Global South scholars (Connell, 2007).

4.1. Comparative Governance Studies within the Global South

To transcend the US/EU versus the rest dichotomy, future studies must focus on comparative research on how various countries in the Global South, including Pakistan, India, Indonesia, and Nigeria, are adapting to digital platforms. Exploring these variations, researchers can build on the recent cross-country studies in other aspects of policy (see, e.g., Brubacher et al., 2024) to reveal insights that would add to a more holistic perspective on platform governance and inform more culture-specific strategies (Hashim, 2021). These studies must go beyond addressing the existence of differences to examining the historical, political, and cultural conditions underpinning

specific regulatory philosophies and practices in the Global South.

4.2. The Geopolitics of Moderation

The invisible labor of content moderation should be examined in future studies. Who is censoring material in languages like Urdu, Pashto or Sindi? What is the type of cultural training they are receiving as well as the consequences of their decisions on the life of local communities? Illuminating this invisible work is an important way of bringing openness to what has been considered as the blackbox of social media content moderation (Kubli et al., 2023) with dominant discourses typically missing the nuances of language, culture, and regional politics (Gorwa et al., 2020). In particular, studies should be conducted on the outsourcing model of large platforms to the moderation hubs in the Global South, exploring the labour conditions, psychological effects on moderators, and how their interpretations of the content guidelines (in most cases, developed in the West) are applied to local languages and cultural specifics (Roberts, 2019).

4.3. The Impact on Local Democracies

Lastly, there is a need to research on the impact of platform takedown measures on elections, social movements, and press freedom in countries such as Pakistan. Nevertheless, content moderation may also have considerable influence on democratic practices, especially where political dissent and civic activism are involved. The impact of content removal on social movements can also be investigated to understand how the voices of the oppressed can be systematically suppressed preventing democratic participation (Magee et al., 2019). This kind of research is crucial to building more proportional systems of platform regulation that will focus on democratic involvement. It involves investigating special instances of either removing or blocking of content or accounts, which have had a disproportionate impact on political opposition, human rights advocates, or independent journalists, which have ultimately influenced the manner in which people talk about issues and vote, potentially to the detriment of democratic principles in the locality (Reporters Without Borders, 2022).

5. Conclusion: Toward a Pluralistic Vision of Digital Sovereignty

This paper has asserted that Euro-American conceptualization of platform governance is not adequate to the complexities of Global South countries. Through the case study of Pakistan, we have pointed out that governance policies should be informed by local realities which encompass issues like national security, political stability, and cultural practices that are on the extreme opposite of the West- dominated and prevailing culture where emphasis is on individual expression.

As digital sovereignty gains more prominence in the future, it is necessary that the discourse on the matter be extended into a pluralistic view that recognises the sovereign entitlement of all states, not only those that reside on the Western side of the divide. The discussion should not be reduced to the values, which have been developed in the Global North, but rather adopt a more global, multi-polar discourse that will allow countries in the Global South to declare their rights and priorities when it comes to the digital sphere. To achieve a fairer digital environment where different cultural narratives and legal frameworks co-exist, a pluralistic vision that will favor the voices of all nations is needed. It involves all the stakeholders, policy makers and platform leaders alike, to have meaningful discussions that amplify the voices of the Global South resulting in a more democratic and equitable digital future.

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