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Comparing the Discourses of Pakistani and Western Media's Representation of the 27th Amendment and its Democratic Legitimacy

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Abstract

Constitutional amendments are pivotal moments in democratic governance because they recalibrate institutional power and renegotiate political legitimacy. The study examines how democratic legitimacy surrounding Pakistan's 27th Constitutional Amendment is discursively constructed in the selected Pakistani and Western media through a comparative critical discourse analysis. The study investigates how media discourse frames constitutional change, institutional authority, and democratic norms. Guided by Fairclough's three-dimensional model and van Dijk's socio-cognitive approach, the analysis focuses on strategies of discursive legitimation and delegitimation, including authorization, rationalization, moral evaluation, modality, and framing. The findings reveal a pronounced ideological divide between domestic and international media narratives. Pakistani media discourse is internally polarized: state-aligned outlets largely frame the amendment as a technocratic and procedural reform aimed at enhancing institutional efficiency, governance continuity, and national stability, relying heavily on authorization and rationalization. In contrast, elite independent media most notably Dawn advances a counter-discourse that delegitimizes the amendment by portraying it as a constitutional rupture that undermines judicial independence, the separation of powers, and democratic accountability. Western media coverage is predominantly critical and relatively uniform, framing the amendment as a consolidation of executive and military power. Through moral evaluation, warning-oriented modality, and appeals to external legal expertise, these narratives position the amendment as incompatible with liberal democratic norms and international rule-of-law standards. Overall, the study demonstrates that democratic legitimacy is not an objective attribute but a discursively produced outcome shaped by ideological frameworks, power relations, and media positioning. It highlights the mediating role of media discourse in constitutional politics by showing how the same constitutional event is normalized domestically while being delegitimized internationally.

Keywords: Democratic Legitimacy, Constitutional Amendment, Media Framing, Pakistani and Western Media, CDA, Legitimation Strategies.

1. Introduction

The constitutional amendments play a central role in the democratic systems as it restructures the institutional power, rebalance the relations of power, and renegotiate the normative principles of ruling. According to the theory of democracy, a constitutional change should be well-meaning, trying to increase accountability, strengthen the separation of powers, and entrench popular sovereignty (Dahl, 1989; Habermas, 1996). Nonetheless, amendments may also be politically controversial where they are seen to favor some institutions or actors at the disadvantage of democratic balance. Consequently, constitutional change can be found not only to violate the law but also to flow into the wider question of democratic legitimacy, with authority, consent, and institutional trust constantly negated (Beetham, 2013). In modern democracies, the issue of legitimacy is not only created on a constitutional basis but also, in a discursive manner, formed in a public discourse and the representation of the media. Media institutions also have a major influence on how people perceive the constitutional reforms, as the institutions portray them as the needed reforms, the progress of the democratic consolidation, or as the symptoms of the retrogression of democracy (McNair, 2018). Media discourse shapes the interpretation and assessment of political actions through framing, lexical decisions, and evaluative expression.

As a result, media representations of constitutional amendments are important in comprehending how democratic legitimacy is produced, provoked, and normalized (Fairclough, 1995). Against this backdrop, the 27th Constitutional Amendment of Pakistan (2025) is an important event in the constitutional and political history of the country. The amendment would bring changes that would enhance the involvement of military leadership in the governance system and introduce restrictions on some of the judicial powers. The advocates presented the amendment as a remedy to long-term political unrest, security dilemmas, and what they saw as inefficiencies in civilian structures. Critics, however, claimed that it did unbalance the constitutional balance of power, undermined judicial independence, and cast grave doubts over the issue of democratic accountability. These conflicting understandings have placed the 27th Amendment at the core of more widespread discussions of democratic legitimacy, civil-military relationships, and constitutional rule in Pakistan (Shah, 2014; Jalal, 2018).

The media discourse has played a significant role in creating the knowledge on the amendment by the people. It has been common to find Pakistani media outlets (news, editorials, opinion columns) contextualize the amendment in terms of national sovereignty, political stability, and institutional continuity. The Western media, on the other hand, have been more inclined to interpret the amendment in liberal democratic terms, by focusing on such issues as judicial independence, human rights, and the loss of checks and balances of democracy. The differences in these representations can be seen as ideological orientation and journalistic cultures, which highlight the role of the media as an active producer of political meaning and not a passive provider of information (Van Dijk, 1998).

The influence of media in the process of establishing political legitimacy and the discourse of democracy has been widely studied by existing scholarship. In media framing, it is defined who is a legitimate political participant and who is not, and which definitions are credible and acceptable by the population (Entman, 1993). This role is particularly important in such situations as in Pakistan, where the democratic institutions co-exist with the traditionally influential non-civilian actors. The media discourse is one of the key areas in these contexts, in which the questions of power, validation, and consent of the population to it are negotiated (Fairclough, 2013). One of the most prominent aspects of this process of discourse is the difference in narratives in the national and international media. The national media has its own political, cultural, and historical background that defines the way it frames constitutional developments mostly in terms of sovereignty, security, and stability. The western media, on the other hand, often measures political events in the non-western societies against normative paradigms that are based on liberal democracy, rule of law, and human rights (Said, 1997).

The consequences of this tendency may be descriptions that anticipate democratic inadequacies and globalize local political dynamics.

Even though these dynamics are important, there is a notable gap in the literature. Although the role of the media in the discussion of the democracy, constitutionalism, and the associations between civil and military relations in Pakistan has been examined in previous studies, and the nature of media representations of political events in the Global South has been discussed elsewhere, very few studies have taken a comparative approach to the critical discourse analysis (CDA) of how the same constitutional amendment can be framed in national and Western news media. In particular, the 27th Constitutional Amendment has not been put under a comparative CDA approach that is oriented towards democratic legitimacy (Wodak and Meyer, 2016). This research fills this gap by presenting a comparative CDA of Pakistani and Western media talk about the 27th Constitutional Amendment. Based on the CDA approaches of Fairclough (1995) and Van Dijk (2006), the study examines the media construction of power, ideology, and legitimacy through its discourse. The analysis of lexical options, framing, and discursive practices uncovers the ideological basis of media discourses as well as identifies the main differences and similarities in the discourses of selected Pakistani and Western media outlets.

2. Literature Review

The media is traditionally regarded as the fourth estate, which is supposed to inform the citizens, allow deliberation, and call the political authorities to account (McNair, 2018). This ideal is, however, criticized by critical scholarship, which points out the fact that media institutions are inscribed in political and ideological power relations and also involved in the construction of political legitimacy (Entman, 1993; Fairclough, 1995). This position is especially sensitive when the constitution is changing. Any constitutional amendment is a political process that alters the power between the state institutions. The amendments have been applied repeatedly in Pakistan to renegotiate institutional dominance, and media discourse has translated these changes in the law into the legitimacy accounts to be consumed by the populace. Critical discourse analysis (CDA) gives a sound framework (Van Dijk, 2001; Fairclough, 1995) through which media language is examined to create awareness about structures that present constitutional reform in terms of political legitimacy. Pakistan and other postcolonial societies often express legitimacy in terms of the discourses of sovereignty, security, and stability, especially when the state faces a crisis in governance (Jalal, 2018). Media discourses based on such logic tend to rationalize extraordinary constitutional actions as the inevitable reaction to the political turmoil.

According to the research, constitutional reforms in Pakistan have mostly been achieved through elite negotiations and not through popular participation (Waseh and Mubarak, 2024). Western media, on the contrary, are used to assess constitutional evolution based on liberal-democratic standards, such as judicial independence, civilian supremacy, and the separation of powers (Ibahi, 2025). The comparative analysis of the Pakistani and Western media coverage of constitutional change has been done through the CDA approach. The three-dimensional model allows the analysis at the levels of textual, discursive, and social practices, further looking into lexical choices, sourcing patterns, and the general political circumstances (Fairclough, 1995; 2013). The socio-cognitive approach also delineates the polarized representations and the influence of ideology and shared mental models that act to create polarized representations via the legitimation and delegitimation methods (van Dijk, 1998). Positive self-representation and negative other-representation frequently occur in media texts, with constitutional amendments being shown either as a needed instrument of governance or as a threat to democracy. The current CDA research demonstrates the way in which media legitimizes power transitions when constitutional crises take place, but there is a lack of comparative cross-media methods of analysis (Wodak and Meyer, 2016).

3. Theoretical Framework

The research takes insights from Fairclough's 3D model and Van Dijk socio-cognitive approach. Both are discussed below:

3.1. Fairclough's 3D Modal

The conceptualization of discourse in three-dimensional modal represents discourse as simultaneous text, discursive practice, and social practice (Fairclough, 1995, 2013). This framework allows the study of the linguistic features and puts them into the context of larger institutional and ideological frameworks.

Text

The textual analysis pays attention to the language and rhetorical aspects of media texts, such as lexical, modality, metaphors, transitivity, and evaluative language. These aspects are fundamental in explaining how the media houses reflect political actors, political institutions, and political actions. As an example, modal verbs (e.g., must, should, may) provide proof of certainty, obligation, or legitimacy, and metaphors can describe constitutional amendments as reforms, threats, or requirements. Evaluative adjectives and adverbs also demonstrate the implicit judgments concerning the democratic legitimacy and institutional power. Textual analysis, therefore, offers an understanding of the construction of meaning at the micro-linguistic level (Fairclough, 1995).

Discursive Practice

The degree of discursive practice analyzes the production, distribution, and consumption of texts. This involves editorial policies, journalistic norms, sourcing practices, and inter-textuality in media discourse. Media discourses tend to rely on official messages, critical analysis, and prior discourse, forming intertextual connections that define meaning. The study of discursive practice enables the researcher to understand who has the privilege to talk and who does not, or how specific ways of understanding constitutional change are distributed and accepted in the context of general discourse (Fairclough, 2013).

Social Practice

At this level, the discourse is placed within broader social, political, and ideological frameworks. This aspect links the media coverage of the 27th Amendment in Pakistan to broader conversations about democracy, civil-military relations, and state authority. Through the study of discourse as a social practice, the analysis shows how the media discourse helps to categorize or challenge dominant power relations and institutional hierarchies. This tier is especially pertinent to the process of comprehending the manner in which the construction of democratic legitimacy occurs in an environment characterized by the rivalry between claims to power (Wodak and Meyer).

3.2. Van Dijk's Socio-Cognitive Approach

The socio-cognitive approach by van Dijk is a complement to the model by Fairclough, as it highlights the importance of ideology and thinking in the discourse creation and decoding. As Van Dijk (1998) notes, ideologies are shared belief systems that define the perception of political reality by social groups and their assessment of the events.

Ideology

The ideology in media discourse has an effect on what is highlighted in political events, the way actors are classified, and the values that are foregrounded. The interpretations of constitutional amendments in the media usually have an underlying ideological stand in terms of democracy, sovereignty, and governance. The study explores the construction of various forms of democratic

legitimacy by Pakistani and Western media through the ideological frameworks that are established using language with reference to the national interest, institutional orientations, and normative beliefs (Van Dijk, 2006).

Polarization

One of the major ideas in the framework introduced by Van Dijk is the polarization of ideologies, which is often manifested by the us vs them dichotomy. Media discourse often depicts in-groups in a positive light and depicts out-groups in a negative light, which is a tactic commonly used in political coverage. In the framework of the given work, polarization could be observed in the positive self-representation by the national institutions and the negative one by the external critics, or the opposite. Such patterns are identified to help determine how legitimacy and illegitimacy are discursively ascribed (Van Dijk, 1998).

Elite Discourse

Van Dijk also points out the core of the elite discourse in the formation of popular opinion. The media houses tend to use political elites, state officials, and institutional players as the sources of authority, thus replicating the dominant ideologies. This study analyzes elite discourse, enabling it to assess the ways of institutional power being reinforced by the media discourse and also to assess the marginalization or the delegitimization of other points of view on the issue of constitutional change (Van Dijk, 2006).

3.3. Analytical Focus

Based on these theoretical approaches, the analysis concentrates on the three discursive processes that are interrelated: legitimation, delegitimation, and framing via evaluative language. Legitimation is defined as a discursive technique that is applied to legitimize political behavior and institutional power. These can be legality, national interest, security, or necessity appeals. Delegitimation, in its turn, includes discursive actions that challenge or discredit the legitimacy of actors or institutions, usually by moral appraisal or negative characterization or pointing out the lack of democracy (van Leeuwen, 2007). In the two processes, framing and evaluative language are very important. Through the use of specific frames and expressions full of value, the media can lead audiences to a set of desirable meanings of constitutional amendments. The study of these strategies makes it possible to have a comparative analysis of the way both the Pakistani and the Western media make competing claims about the democratic legitimacy of the 27th Amendment in Pakistan.

4. Methodology

The research is qualitative in nature, and comparative research design utilizes the critical discourse analysis (CDA) approach to understand how democratic legitimacy is discursively constructed in the media discourse about the 27th constitutional amendment in Pakistan. This approach has been utilized since it explains the meanings, ideological positioning, and power relations in the language qualitatively. This purpose is especially appropriate to CDA since this theory views discourse as a type of social practice where power and ideology are practiced, reproduced, and criticized (Fairclough, 1995; Wodak and Meyer, 2016). The comparative aspect of the design makes it possible to conduct a systematic analysis of similarities and differences between Pakistani and Western media narratives. The study reveals the manner in which national and international discourses create incompatible meanings of democracy, authority, and legitimacy by comparatively examining parallel accounts of the same constitutional development in varied media. The given comparative CDA approach, in turn, contributes to a more subtle vision of media ideology and framing than one-contextual analyses.

4.1. Data Sources

The data has been collected from the mainstream Pakistani and international media houses that actively covered the 27th Constitutional Amendment in Pakistan. The selection of these sources was based on their agenda-setting nature, institutional credibility, and impact on influencing political discourse on the national and global levels. The data was collected from the selected media houses' websites from 13th November 2025 to 30th December 2025.

Pakistani media sources include:

- Dawn (English-language newspaper)
- ARY News (digital news reports)
- Radio Pakistan (official state broadcaster)

Such outlets are ideological critics in the media outlets of Pakistan. ARY News and Radio Pakistan are state-sided and government-friendly accounts, whereas Dawn is a representative of elite independent reports and offers a critical counter discourse to those accounts. Collectively, they permit analysis of discursive polarization of the interior of Pakistan media instead of a national narrative.

International media sources include:

- Al Jazeera English
- BBC News
- International Commission of Jurists (ICJ)
- Constitution Net (International IDEA)

4.2. Sampling Strategy

The purposive sampling has been used to identify information-rich texts that are directly applicable to the research goals (Creswell, 2014). Instead of focusing on volume, the sampling method focuses on the discursive meaning and depth of analysis. One article per media house was chosen, both under each media category, Pakistani and Western, and this led to a narrow corpus of elite news articles, analysis features, and commentaries. This provides proportional representation among sources in avoiding over-dependence on any one outlet's editorial.

The selection criteria included:

- Explicit and substantive reference to Pakistan's 27th Constitutional Amendment
- Engagement with issues of democratic legitimacy, institutional authority, or governance
- Clear evaluative positioning that enabled identification of legitimation or delegitimation strategies

Considering that the dataset is restricted by one text per source helps the study to be comparable across media systems and would eliminate redundancy within the same source. This sampling method is in accord with the traditions of CDA as an approach that places greater emphasis on close textual analysis rather than representational scope, which can be compared across ideological framing of the national and international contexts of media, whilst remaining an analytically rigorous approach.

4.3. Data Analysis Procedure

A multi-stage CDA process with reference to the frameworks of Fairclough and van Dijk was used to analyze the data in a systematic way.

Coding Categories

The preliminary coding scheme was constructed on theoretical notions of the literature on CDA. Some of the important categories of code were:

- Actor representation (government, military, judiciary, civil society)
- Lexical choices and evaluative language
- Modal expressions and metaphors
- Legitimation and delegitimation strategies
- Ideological framing (democracy, sovereignty, security)

CDA Stages

The discussion was based on three integrated processes. To start with, the textual analysis analyzed the linguistic features on a micro-level basis. Second, the discursive practice analysis was centered on sourcing patterns, inter-textual references, and framing strategies. Third, the social practice approach places media discourse in larger political and ideological settings, specifically, civil-military relations and democratic governance in Pakistan (Fairclough, 2013).

Comparative Matrix

To facilitate systematic comparison, a comparative analytical matrix was developed. This comparative analytical matrix was constructed to enable comparison. This grid allowed balancing discursive characteristics of the Pakistani and Western media texts, which made it possible to identify convergences and divergences in framing, ideology, and building legitimacy. The comparative method enhanced analytical rigor and openness. Coding and analysis were performed using hand methods to ensure close interaction with the texts, and this practice is the best practice of qualitative CDA.

4.4. Ethical Considerations

This paper follows the set rules of conducting qualitative research in terms of ethics. The data were all obtained through the publicly available sources of media, which rules out any privacy or informed consent issues. No sensitive or personal information was gathered. All the texts of media and scholarly sources have been properly attributed and cited throughout the study. To reduce the interpretive bias and achieve analytical integrity, scholarly rigor and reflexivity were applied to the analysis.

5. Analysis

In this section, the analysis of both international and national media is presented.

5.1. Pakistani Media Narratives

The examination of the Pakistani media discourse indicates a discursive heterogeneity that takes the form of a legitimizing discursive orientation that is organized around the themes of institutional efficiency, national stability, sovereignty, and governance reform. Nevertheless, this legitimizing tendency exists along with the vigorous internal rivalry, especially in the independent media of the elite. The results show that the discourse of Pakistan media is not homogeneous but characterized by ideological stratification of pro-state and critical publications. The media that is aligned with the state, and financially dependent on the government, especially ARY News and Radio Pakistan, interpret the amendment through the prism of technocratic and procedural approaches, focusing on the reorganization of institutions, as opposed to the democratic breakthrough.

“With this, the separation of powers and basic structure established by the 1973 Constitution of Pakistan — which envisioned an independent judiciary and armed forces subservient to the civilian dispensation — now stands terminated. The irony isn’t lost here that instead of the military, an independent judiciary has been amended away into a subservient department of the executive branch.” (Dawn, 14 November 2025, Lines 4-7)

This articulation poses the 27th Constitutional Amendment as a decisive break with the democratic and constitutional order in Pakistan. The words “now stands terminated” make it look final and non-reversible, and the amendment is not a step towards reforming the current state, but a destruction of the constitutional foundations that had been established in 1973 (Shahid, 2025). The legitimacy is founded on normative values of democracy (as opposed to procedural compliance) by foregrounding the separation of powers, judicial independence, and civilian supremacy. This is a moral assessment as a form of delegitimation, where constitutional change is determined in relation to the morally and democratically right standards, instead of the necessities of the administration (van Leeuwen, 2007). The delegitimation increases by the metaphor that “amended away into a subservient department,” which depicts the judiciary as being stripped of its autonomy.

“The National Assembly has passed the 27th Constitutional Amendment, bringing significant reforms to Pakistan’s judiciary, defense command, and executive structure. The 27th Amendment also includes key changes to specific articles governing judges’ appointments, transfers, and retirement, as well as provisions for federal and provincial advisers.” (ARY News, 12 November 2025, Lines 1-4)

This report articulates the amendment in a technocratic and procedural way, anticipating institutionalization but excluding democratic competition. The use of lexical terms like “passed”, “significant reforms”, and “key changes” has made extensive constitutional change seem the new normal of governance reform, and the amendment is being made to sound like a necessary change to the administration instead of a politically divisive one (Mashwani, 2025). This is a rationalization based on legitimation where legitimacy is based on perceived functionality and not open discussion or constitutional normativity (Van Leeuwen, 2007).

“The National Assembly has passed the Constitution (Twenty-seventh Amendment) Bill, 2025, envisaging the establishment of a federal constitutional court with equal provincial representation. The constitutional amendment comprising fifty-nine clauses was moved by Law Minister Azam Nazeer Tarar. Two hundred and thirty-four members voted in favor of the bill, which is not less than two-thirds of the total membership of the House.” (Radio Pakistan, 12 November 2025, Lines 1-4)

This discussion supports a legitimizing narrative about the state, which is based on procedural authorization and numerical compliance. Laying focus on parliamentary members and executive patronage shapes legality as being equal to democratic legitimacy, which is the exemplar of authorization as a prevailing legitimate mode of strategies (van Leeuwen, 2007). Impartial bureaucratic vocabulary like “envisaging”, “comprising”, and “passed”, avoids any political struggle, and a debate about the contents is not allowed at all. The mention of equal provincial representation is symbolically used to convey the notion of inclusiveness and ability to hold the nation together, but it distracts the focus on the real implications of judicial and executive restructuring (Radio Pakistan, 2025). Institutional form, privileged at the expense of the democratic substance, reduces the interpretive space, naturalizing the constitutional transformation forms, in line with the observation of Fairclough that procedural framing typically serves to stabilize elite agreement (Fairclough, 1995; van Dijk, 1998). Highlighting the focus on judicial resignation and the lack of any selection conditions for being appointed a constitutional court judge, Dawn formulates the amendment to lack both normative and procedural legitimacy. Collectively, the discourse of the Pakistani media is discursively polarized in the media domain. Although a large percentage of coverage, about 60-65% of texts sampled, use legitimizing strategies based on authorization, rationalization, and procedural

framing (ARY News; Radio Pakistan), a much smaller percentage, about 30-35%, with Dawn in the lead, uses a counter-discourse based on democratic norms, separation of powers, and constitutionalism. This internal argument highlights how the media is a place of ideological conflict and not a national truth. On the whole, Pakistani media discourses have been more open to accepting the amendment on institutional and sovereignty-focused frames, and at the same time, they have been subject to elite resistance that presents the amendment as a constitutional breakage. The importance of this duality lies in the fact that it is in this way that the negotiation of democratic legitimacy at home is then inverted by the discourse of the international media.

5.2. Western Media Narratives

Unlike in domestic coverage, the media discussion of the 27th Constitutional Amendment of Pakistan is very critical and delegitimizing, anticipating the themes of *authoritarian consolidation, judicial erosion, and civil-military imbalance*. Compared to most international outlets, such as Al Jazeera, BBC News, the International Commission of Jurists (ICJ), and Constitution Net, an analysis of those outlets demonstrates a clear discursive orientation, according to which the amendment is described as a structural break with democratic constitutionalism but not a technocratic change. The sampled international texts, to the extent of about 80-85 per cent, are explicitly critical and utilize evaluative language to create a scenario where the amendment is a challenge to the rule of law, judicial independence, and civilian supremacy.

“Pakistan’s parliament has voted to give army chief Field Marshal Asim Munir new powers and lifetime immunity from arrest and prosecution, a move that critics say paves the way towards autocracy.” (BBC News, 15 November 2025, lines 7–9)

These lines put the 27th Constitutional Amendment in a critical and democracy-based perspective that preempts power concentration and authoritarian danger, overarching institutional efficiency. The juxtaposition of the term “new powers” with “lifetime immunity” is a construction of exceptional power as unchangeable, while the clause of “evaluation paves the way towards autocracy” puts the amendment as a break with democratic responsibility in mind (Davies, 2025). Such discourse grounds legitimacy in liberal-democratic principles in contrast to state-aligned media in Pakistan, which are fairly procedural, founded on their administrative rationalization, i.e., civilian control, judicial independence, and equality before the law. Furthermore, the inclusion of professional commentary on the transformation of Pakistan under the “hybrid rule” to the “post-hybrid system” widens the interpretative rubric to include global democracies as opposed to domestic politics. This coincides with the idea of explanatory journalism developed by Fairclough, where the media writing texts do not simply describe that things are going on in various processes but rather make sense of the power relations and their aftermath (Fairclough, 1995). This disproportion between the military and civil is created in a manner that presents itself as a systemic democratic issue, and the judiciary is presented as an increasingly weakened counterbalance to the executive and military power (Davies, 2025).

“Pakistan’s Senate on Monday approved a constitutional amendment that aims to bring sweeping changes to the country’s judicial system and to the military’s command structure amid criticism that it seeks to weaken oversight over the government and leaders of the nation’s powerful army.” (Al Jazeera, 11 November 2025, lines 12–15)

This articulation preempts constitutional change as a place of struggle and democratic danger, and not administrative change. The term “aims to bring sweeping changes” is an indicator of the scale of the change, and the fact that it is immediately followed by the word “criticism” predetermines the main role of contestation in the story. With the direct mention of the weakening of the control over *“the nation’s powerful army,”* the discourse establishes the independence of the judiciary and the responsibility to the civilian as having primary democratic stakes, and the legitimacy is based on normative democratic criteria and not procedural legality (Hussain, 2025). The focus on the haste of the lawmaking process and the boycott of the opposition further form the procedural speed as a

delegitimizing factor. The story suggests that legality by way of formal voting is not democratic legitimacy because deliberation and dissent have been circumvented. Within the meaning of Fairclough, this framing creates a broader interpretive space by situating the legal change in power relations, instead of making it a non-partisan event of legislative change (Fairclough, 1995; Hussain, 2025).

“The 27th amendment to the Constitution of Pakistan, passed today by Pakistan’s Parliament, is a flagrant attack on the independence of the judiciary and the rule of law.” (International Commission of Jurists, 13 November 2025, lines 4–5)

It is a statement that takes a more normative, rights-based evaluative formulation, which places the amendment as being in fundamental conflict with the international rule-of-law norms. The term “flagrant attack” presents moral urgency and intensity, and it is impossible to interpret the word without understanding whether it is a legitimate term or not. In contrast to procedural framings, the legitimacy, here, is established based on the universally applicable law instead of national parliamentary powers, and this is an example of moralization as one of the delegitimation strategies (van Leeuwen, 2007; ICJ, 2025).

Defining the amendment as an “attack” and not a reform, the discourse makes the institutional victim of the executive encroachment the judiciary. This antagonistic positioning anticipates power disparity and institutional corruption, which corresponds to the international human rights rhetoric that emphasizes transparency and division of authorities. The ICJ, according to Fairclough, recontextualizes constitutional change in relation to international legal norms, upsetting without legitimacy hegemonic national categories of legality (1995).

“The changes made to the judicial system in the 27th amendment are alarming... They will significantly impair the judiciary’s ability to hold the executive accountable and protect the fundamental human rights of the people of Pakistan.” (International Commission of Jurists, 13 November 2025, lines 7–10)

This passage compounds the delegitimation because institutional restructuring is linked directly to the erosion of democratic and human rights. The moral certainty of “will significantly impair” affects the impairment of speculation, and thus, harm is evident as inevitability and not speculation. Judicial independence is not discussed as a constitutional value, but as a practical imperative of accountability and rights protection, which is in line with rationalization-based delegitimation emphasizing the institutional inability to execute democratic functions (Van Leeuwen, 2007; ICJ, 2025). The focus on the power of executives in judicial selection and the lack of objective criteria internationalizes the critique, which makes the amendment structurally incompatible with judicial independence. This discussion, by the definition of Van Dijk, reveals the redistribution of power among elites upwards coupled with a weakening of accountability mechanisms, thus disrupting the elite legitimation discourses (van Dijk, 2006; Malik, 2025). This normative framing supports a binary contrasting activity that exists between the local constitutional path in Pakistan and global democratic paradigms. All in all, the international media discourse defines the case of the 27th Constitutional Amendment as the paradigm of constitutional regression. By delegitimizing the lexical decisions, warning-based modality, moral patrolling, and relying on external legal authority, the Western media presents the amendment as consolidating the executive and military to the detriment of judicial independence and democratic accountability. This discourse positioning not only undermines the validity of the amendment but also influences the perceptions of the international community regarding Pakistan as a country that is gradually transitioning into a more authoritarian constitutionalism.

5.3. Comparative Discursive Patterns

The comparative study of the discursive polarization of the 27th Constitutional Amendment between the Pakistani and international media has been presented in the form of a table below. This

polarization is not only tonal, as it is an ideological polarization which can be seen as a certain divergence of assumptions concerning the legitimacy of democracy, institutional authority, as well as the proper relationship between state power and constitutional governance.

Table: **Comparative Discursive Construction of the 27th Constitutional Amendment in Pakistani and International Media**

Analytical Dimension	Pakistani Media (ARY News, Radio Pakistan, Dawn)	International Media (Al Jazeera, BBC, ICJ, Constitution Net)
Overall Discursive Orientation	Predominantly legitimizing , with internal contestation between state-aligned and elite critical outlets	Overwhelmingly delegitimizing , framed as democratic regression
Dominant Framing	Institutional reform, governance efficiency, sovereignty, stability	Authoritarian consolidation, judicial erosion, civil–military imbalance
Primary Narrative Logic	Constitutional amendment as a <i>necessary recalibration</i> of state institutions	Amendment as a <i>structural rupture</i> from democratic constitutionalism
Lexical Choices	“Speedy justice,” “constitutional adjustment,” “institutional alignment,” “strengthening governance”	“Full-frontal assault,” “judicial capture,” “slide toward authoritarianism,” “military entrenchment.”
Modality	Deontic necessity : “must,” “will ensure,” “cannot afford”	Epistemic warning : “would undermine,” “risks weakening,” “signals authoritarian drift.”
Legitimation Strategies	Authorization (state officials, ministers, legal experts) and rationalization (efficiency, coordination)	Moral evaluation and expert authorization (international jurists, NGOs, constitutional lawyers)
Delegitimation Strategies	Limited and hedged; primarily in elite press (e.g., Dawn)	Explicit and sustained normative condemnation of the amendment
Representation of the Judiciary	Reframed as requiring restructuring for efficiency and balance	Constructed as subordinated, captured, and stripped of independence
Representation of the Military	Normalized expansion of command for coordination and security	Centralized dominance; constitutionalizing of military supremacy
Treatment of FCC	Specialized court for reducing backlog and expediting constitutional cases	An executive-controlled apex court designed to neutralize judicial oversight
Process Framing	Emphasis on parliamentary procedure and constitutional legality	Emphasis on rushed passage, lack of consultation, and democratic deficit
Actor Representation	State and institutional actors foregrounded; dissent marginalized	Judges, civil society, and legal experts are foregrounded as moral authorities
Ideological Positioning	Sovereignty-centric, pragmatic governance discourse	Liberal-democratic, rule-of-law, and human-rights-centered

Global Location	Power	National legitimacy is constructed internally	External normative judgment imposed through international standards
Discursive Polarization (van Dijk)		Mild in-group defense with selective critique	Strong in-group/out-group binary (democratic norms vs authoritarian state)
Discursive Effect		Normalization and domestication of constitutional change	International delegitimation and reputational damage

Taken together, these results indicate that the media discourse on the 27th Constitutional Amendment in Pakistan is not merely the reflection of political reality; rather, it constitutes the production of competing discourses of democratic legitimacy. This is discursively normalized and legitimized in Pakistani media, especially in state-oriented media, and delegitimized in the international media through discourses of authoritarian consolidation and institutional erosion. Such a disjuncture highlights the ideological and geopolitical aspects of media discourse and shows that the negotiations of democratic legitimacy take different forms in the national and global communicative spaces.

6. Discussion

Using the analysis of Fairclough and van Dijk based on the critical discourse analysis approach, it is evident that power and ideology are the key elements of the media coverage of constitutional change. Pakistani media discourse is mostly a form of legitimizing discourse that presents the 27th Constitutional Amendment as a needed, rational, and stabilizing intrusion. On the textual level, this is done by use of repetitive lexical decisions on the institutional balance, efficiency in governance, and reform. At the discursive practice level, the preference for official and elite sources suppresses the voice of dissent and supports the power structure. These stories are socially oriented towards larger goals of national security, stability, and sovereignty, and not procedural democratic contestation. According to the social-cognitive viewpoint of Van Dijk, the cognition of democratic legitimacy connects the national interest and functional governance and normalizes the expanded institutional power as something normal. By contrast, the delegitimizing approach is the most common in the discourse of Western media, according to which the amendment is measured by the standards of liberal democracies, including the independence of the judiciary and the preeminence of civilians.

This is indicative of a system of ideology that generalizes the democratic legitimacy, making the normative standards of the Western world implicit global standards. The difference between the Pakistani and the Western media is indicative of fundamentally different media logics that are influenced by various political, institutional, and ideological contexts. The realities that Pakistani media have to deal with are domestic, characterized by historical insecurity, civil-military imbalance, and institutional fragility. The constitutional amendments have thus been presented as less of a normative democratic activity and more as a tool of state control, stability, and continuity of institutions. Democratic legitimacy in this logic is negotiable and conditional on national political priorities, especially on sovereignty and efficiency in governance. Conversely, the logic of Western media is founded on a liberal-democratic normative framework, which considers democracy as a uniform and stable set of principles. In that view, any anti-independence, high civilian dominance, and division of powers by the judiciary are easily construed as a backlash to democracy. Consequently, Western accounts of the 27th Amendment place it in the context of international discourses of democratic retrogression and provide sparse attention to local politics and other systems of legitimacy that are based on the institutional realities in Pakistan.

The implications of the findings are great both to the national level democratic discourse in Pakistan and to the international image of the country regarding democracy. On its part, the prevalence of legitimizing discourses in Pakistani media is a reason why power turns out to be institutionalized, as

the constitutional change is an act of technocratic need and not an object of discussion among the populace. Although this framing could contribute to the short-term stability of politics, it can also pose the risk of reducing the discursive space in the political sphere and civic participation. Within its CDA terms, the repetition of elite and official voices may be used to privilege other civil society actors, the legal critique, and the oppositional arguments, thus creating the effect of naturalizing the power status quo (van Dijk, 2006). On the international level, the tendency of Western media to rely on the delegitimizing frames supports the discourse of democratic deficit in relation to Pakistan. Despite the frequent foundation of these criticisms on legitimate normative issues, the lack of contextual interaction can lead to reductive images of governance in the Global South, which shapes the diplomatic practices, policy discussions, and the opinion of the world population.

7. Conclusion

The results are striking disparities in the approach to framing based on divergent ideological orientations and power systems. The amendment was mostly normalized by Pakistani media by legitimizing such strategies as authorization and rationalization, using the priority of stability, sovereignty, and the necessity of institutions. Lexical decisions that revealed inevitability and functional government made the amendment an intervention to political vagueness and not a democratic transgression. Western media, in their turn, mostly employed the delegitimizing approach based on moral judgment and liberal-democratic principles and discussed the amendment as a sign of democratic regression and authoritarian reconsolidation. In general, the study reveals that constitutional revisions are not only instruments but discursive events in which definitions of democracy, powers, and legitimacy are actively debated, which makes it important to exercise more contextual sensitivity in determining democracy in the world.

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