

2020 Annual Report: Dynamic Coalition on the Sustainability of Journalism and News Media

Preface by Anriette Esterhuysen

Edited by Daniel O'Maley, Hesbon Hansen Owilla,
and Courtney C. Radsch



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Tanja Maksic has been a member of the BIRN Serbia team since 2010. She is in charge of developing and managing projects in the field of media policy and good governance. She also conducts research and is responsible for project design, theme definition, and research methodology; writing policy reports and recommendations; and advocacy work. She holds a Bachelor of Arts in journalism from the University of Belgrade, and has specialized in media monitoring, especially content analysis of media production and the media economy; transparent financing of the media; and countering censorship and soft censorship practices. Her research and advocacy work led to her appointment in the working group tasked with drafting the Serbian National Media Strategy 2020–2025. In the last two years, her research and advocacy focus has shifted more towards issues cross cutting media development and internet governance issues, as the digital space and social media platforms are increasingly becoming a new ground to defend media freedoms.

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Mira Milosevic is the executive director at Brussels-based Global Forum for Media Development (GFMD). She leads GFMD's engagement with the United Nations, the Internet Governance Forum, and other multilateral institutions, as well as GFMD's international efforts advocating for the sustainability of journalism and news media. Mira frequently writes and speaks about the intersection of media, economy, technology, and human rights. Before joining GFMD, she authored the World Press Trends reports, the most authoritative global source of data and analysis on the international newspaper industry; managed media development programs at WAN-IFRA; served as chief platform officer at Indie Voices, and as director of Belgrade-based Media Center. Mira holds a BA in economics and MA in communication; she started her career as a journalist and is still a journalist at heart.

Michael J. Oghia is a Belgrade-based consultant, editor, and researcher working within the digital policy, internet governance, and media development ecosystems. He is the advocacy and engagement manager of the Global Forum for Media Development (GFMD), a third-culture kid, and a connector at heart with more than a decade of professional experience in conflict resolution, journalism and media, policy, and development across five countries: the United States, Lebanon, India, Turkey, and Serbia.

Daniel O'Maley is a digital democracy and internet governance researcher. As the deputy editor and digital policy specialist at the Center for International Media Assistance, he leads the organization's research on how new digital technologies and governance structures are impacting news media systems worldwide. He is the co-author of two CIMA publications, ["Free Internet" and the Costs to Media Pluralism: The Hazards of Zero-Rating the News](#) and [Media Development in the Digital Age: Five Ways to Engage in Internet Governance](#). Prior to joining CIMA, O'Maley conducted a multi-year ethnographic research project funded by the Fulbright Foundation that focused on how Brazilian internet freedom activists have used new media and the internet to foster increased citizen participation in the policy making process. He has presented at the Internet Governance Forum, RightsCon, the Forum on Internet Freedom in Africa, and the Internet Freedom Festival. He holds a PhD in anthropology from Vanderbilt University.

Hesbon Hansen Owilla works at the Aga Khan University's Graduate School of Media and Communications (GSMC) as a research associate. As part of the GSMC team at the Innovation Centre (Media Futures), Hesbon works with the team on implementing research on innovations and media viability in the current epoch of technological and disruptions. He has taught broadcast journalism, new media production, media studies, and communication strategies for the last eight years and he is currently a PhD candidate whose research interest is in political communications and the nexus between media and democracy within the broader framework of the political economy. Grounded in the field of communication and the broader discipline of political economy of the media, Hesbon is a socioeconomic and current affairs analyst with a breadth of knowledge on issues. He has contributed editorial opinions in *The People Daily* newspaper in Kenya. He writes on global trends and innovations in journalism and the art of research-based storytelling, but with a bias towards innovations that expand the democratic space and public conversations. He is a permanent panelist on *Inside Politics*, a socioeconomic and political talk show on KTN News, one of the top TV stations in Kenya.

Anastasiya Pak is a communications specialist focused on the international development sector. As part of the communications and stakeholders team of RNW Media, she contributed to various campaigns and advocacy knowledge products. Currently, Anastasiya is the communications specialist at Aflatoun International, an NGO that provides social and financial education to children and young people worldwide. Prior to her communications experience in international development, Anastasiya worked as a TV news journalist in Uzbekistan, where she authored several programs and documentaries, including "Women's success," a series aimed at promoting gender quality and women's empowerment in Uzbekistan. Anastasiya holds a Master's in journalism, media, and globalisation from the University of Amsterdam.

Courtney C. Radsch is an internationally recognized expert, practitioner, and published author with more than 20 years of experience at the intersection of technology, media, and human rights who has been involved in the IGF since 2010. Currently, she is the advocacy director at the Committee to Protect Journalists, where she leads its technology policy work and engagement with international organizations and tech companies. She serves as the co-coordinator of the newly-established Dynamic Coalition on Sustainability of Journalism and the News Media; the outreach and partnerships chair for GigaNet, the academic network of internet governance scholars; and on the policy committee of the Global Network Initiative. Dr. Radsch has designed and led training for human rights defenders on global advocacy and how to participate and use the IGF, working with a wide range of actors over the ensuing years to increase the participation of traditionally marginalized voices. Prior to CPJ, Dr. Radsch worked for UNESCO where she coordinated strategy in the Arab region, designed and edited the flagship publication "[World Trends in Freedom of Expression and Media Development](#)" and helped conceptualize the "internet universality" framework. Dr. Radsch previously managed the Global Freedom of Expression Campaign at Freedom House, and has worked as a journalist in the Middle East and U.S. including for *The New York Times*, *Al-Arabiya* in Dubai, and the *Daily Star* in Lebanon.

Olaf Steenfadt heads the "Media Ownership Monitor" project and the "Journalism Trust Initiative" at the press freedom watchdog Reporters Without Borders, RSF. For many years, he has been engaged as a consultant in media development and digital policy, mandated by both international organizations and NGOs. Olaf previously worked for national German public broadcasters ARD and ZDF in various roles. He is a member of the "High-level Expert Group on Fake News and Online Disinformation" of the European Commission and of the "Committee of Experts on Quality of Journalism in the Digital Age" and the "Committee of Experts on Media Environment and Reform" at the Council of Europe.

Preface

Anriette Esterhuysen

Internet Governance Forum Multistakeholder Advisory Group Chair

Many writers and commentators have referred to the apparent “death of journalism” during the last two decades. First this was provoked by the rise of citizen and “indy” journalism. But, rather than these new channels of media content creation eradicating conventional journalism, they resulted in creative partnerships between independent media, citizen journalists, and conventional journalism.

Nevertheless, the growing use of the internet as a source of accessing news increased pressure on news media to integrate the internet into their business models. Individual journalists ended up with a far greater workload: having to produce a blog, or content for an online outlet, while still having to produce content for primary print or broadcast channels. Advertising shifted from print to online. Many news media did not survive. At the same time, the internet did lower barriers of entry for some forms of independent journalism, and it became an increasingly rich and diverse source of news for those who had the access and who knew how to look for high-quality content. For journalists telling the stories of social and economic injustice, there were both challenges as well as new opportunities.

But, the impact of that early phase of the evolving relationship between journalism and the internet seems, in retrospect, insignificant when compared to the current context. As large internet platforms invested in sophisticated news content aggregation tools, the role of news media as a direct source of news declined further. However, as platform-based news aggregation processes and advertising-based business models increasingly monetize sensational, violent, unverified, and biased content, the role of journalism is once again front and center. Journalism and news media that can be held accountable are needed more than ever. It is a time to shout loudly: “Journalism is not dead. Long live journalism!” Living long, however, requires sustainability; and that is why the work of this Dynamic Coalition and the content of its annual report for 2020 is so important at this particular time.

Three main points addressed in this report deserve to be highlighted:

- Access to high-quality news and information is a fundamental component to ALL development goals. Thus discussions about how to create a digital ecosystem that fosters and enables news media and journalists to do their work should not just include the media sector itself, but should bring together all sectors in society to work towards this common goal.
- All too often the technical and policy decisions made by tech companies and governments treat the impact on the news media ecosystem as an afterthought, rather than thinking about how those decisions will ripple through our information ecosystem and cross borders. Policymakers should take into account the news media ecosystem when weighing internet governance interventions, particularly initiatives that are intended to increase access. Meaningful access to the internet consists of connectivity and access to relevant, high-quality, informative content.
- The Internet Governance Forum (IGF) is an important venue for discussions on media sustainability because it is global, multidisciplinary, and multi-stakeholder in scope. It is crucially important for discussions on the role of the media and of media sustainability and internet business models are shaped and informed by a diverse set of local and global actors from different parts of the world. Technological innovations and policy interventions developed in one context may have a different impact when applied in other geographical and social contexts. It is not a matter of applying solutions developed in one area to other areas, but of working for these solutions in a collaborative manner across physical, political, technological, and cultural boundaries.

Without sustainable news media and journalism, particularly those that are independent, that reflect critical thinking, and that tell the stories of marginalized people and communities, there is, in my view, no hope for participative democracy, social justice, and respect and promotion of human rights. We need journalism and news media in the IGF, not just to talk about the news, but to talk about the internet and all its facets and its broader social impact. The IGF needs the work of the Dynamic Coalition on the Sustainability of Journalism and News Media and the presence of its members—in 2020 and at all future global, regional, and national IGFs.

Introduction: Internet Governance and Media Sustainability in a Time of Crisis

Daniel O'Maley, Hesbon Hansen Owilla, and Courtney C. Radsch

The past year has been extraordinarily difficult for journalism and news media, as the socio-economic impact of the COVID-19 pandemic has shaken the foundations of the entire sector and the accompanying “infodemic” has propelled new technological and regulatory initiatives that could profoundly impact journalism in the information age. The pandemic-induced economic downturn exacerbated pre-existing challenges to news media sustainability, particularly the unraveling of journalism’s traditional advertising-supported revenue model. Journalists and news media organizations are grappling with a significant drop in revenues, accompanied by pay cuts, lay-offs, and extremely challenging working conditions.

Recent research spotlights the overall severity and potential long-term impacts of the pandemic on news ecosystems worldwide:

- Almost 80% of small and independent journalism outlets around the world are reporting a significant drop in revenue.¹
- Two-thirds of news outlet staff and freelance journalists have suffered pay cuts, lost revenue, job losses, cancelled commissions, or worsening working conditions since the onset of COVID-19.²
- At least 28 governments around the world have used the COVID-19 pandemic as a pretext to implement new laws and regulations that limit access to information online, and significantly restrict media freedom.³

¹ Few Winners, Many Losers: The COVID-19 Pandemic’s Dramatic and Unequal Impact on Independent News Media. The Independent News Emergency Relief Coordination (INERC), Reuters Institute for the Study of Journalism, Oxford University. Publication forthcoming.

² Journalism & the Pandemic: A Global Snapshot of Impacts. International Center for Journalists (ICFJ). https://www.icfj.org/sites/default/files/2020-10/Journalism%20and%20the%20Pandemic%20Project%20Report%201%202020_FINAL.pdf. See also Freelance journalists risk lives and livelihoods amid COVID-19 pandemic <https://cpj.org/2020/04/freelance-journalists-risk-lives-and-livelihoods-a/>

³ Freedom on the Net 2020: The Pandemic’s Digital Shadow. Freedom House. <https://freedomhouse.org/report/freedom-net/2020/pandemics-digital-shadow>

The situation has been so dire that some even warned of a potential “extinction event” for the independent news sector in developing countries.⁴

At the same time as news outlets are struggling to survive financially, the public demand for credible news media has increased during the pandemic. Anecdotally, many news organizations experienced a spike in audience reach as people sought out locally-relevant, up-to-date information about the health crisis. This was especially true for digital news outlets as people in many places relied heavily on the internet to access news. The pandemic has reaffirmed the fundamental value that journalism provides to society, and the central role that the internet plays in the journalistic ecosystem.

The Dynamic Coalition for the Sustainability of Journalism and News Media (DC-Sustainability) was originally formed in 2019 to serve as a platform for diverse stakeholders from across the internet governance ecosystem to engage around issues of sustainability which we mean both the economic and broader forces that uphold independent journalism in society. The coalition’s creation was informed by a belief that the challenge to media sustainability could not be addressed systematically without understanding how media are deeply impacted by internet governance processes and digital policy development. We have long maintained that, given how contemporary news media and journalism organisations produce and distribute content, as well as interact with their audiences primarily through digital technologies, the future, overall sustainability, and even existence of professional journalism and news media is now inextricably linked to the way different layers of the internet are regulated and managed.

Report Overview

This publication represents the inaugural collective effort of members of the DC-Sustainability to develop research and policy analysis that informs internet governance decision-making and impacts journalism and the news ecosystem. The articles and case studies included in this year’s report explore various facets of media sustainability challenges and opportunities in an evolving digital world and what these could imply for how we choose to govern the internet.

In “Algorithmic Removal of News Content in Serbia,” Tanja Maksic from the Balkan Investigative Research Network (BIRN) presents a case study of how news articles on political topics are removed from social media platforms (Facebook, YouTube,

⁴ COVID-19 could trigger ‘media extinction event’ in developing countries. *The Guardian*. <https://www.theguardian.com/global-development/2020/may/06/coronavirus-could-trigger-media-extinction-event-in-developing-countries>

and Twitter) through seemingly automated processes, often without any access to remedy. This not only means that local news consumers might miss out on important stories, but it is also detrimental to independent media because it makes it harder to cultivate an audience and drive traffic to the news outlet's website. Furthermore, she notes the difficulty that news outlets from smaller markets like Serbia have in trying to appeal these removals to the large social media companies that dominate the information landscape.

Along similar lines, in "Facebook Bias against Sexual and Reproductive Health and Rights Advertisements? A case study of The Love Matters Global Network," authors Anastasiya Pak and Anna Hengeveld from RNW Media examine how Facebook's content moderation policies for advertisements lack transparency and are often implemented in uneven and capricious ways in different countries around the world where the Love Matters advocacy network operates, including India, Mexico, Kenya, Nigeria, the Democratic Republic of Congo, Egypt, and China. Their analysis looks at which advertisements related to sexual and reproductive health and rights were rejected by Facebook, and the company's stated rationale for the rejection. They find that this public interest content is being blocked by the social media platform because its moderators label the content to be adult/sexual in nature, thus limiting its visibility to communities that need it most. Their research also notes the Sisyphean nature of effectively challenging such rejections. Moreover, this contribution highlights the often-overlooked gendered nature of content moderation and how that may be impacting our public information ecosystem.

On a related note, the impact of social media company policy can be complicated, even when it is intended to improve the online information ecosystem. This the topic explored in "The Politics of Labels: How Tech Platforms Regulate State Media" by Courtney C. Radsch of the Committee to Protect Journalists, and one of the co-coordinators of this Dynamic Coalition. She examines the relatively new policies from Facebook, YouTube, and Twitter to label the accounts of state-owned or state-controlled news media. These policies emerged after critics charged that the platforms were serving as amplifiers of state propaganda and were even profiting from doing so. Yet, this type of labeling is not an easy task as it requires a level of media expertise to implement, and the relevant information about news organizations, such as ownership, is not always publicly available. The economic impact of these policies on affected news media, as well as their influence on media and information literacy, are unknown and unknowable, however, because the platforms do not collect the data to evaluate the efficacy of these policies on their stated goals.

That being said, the economic impact of social media and general internet policy is crucial to the issue of media sustainability. The underlying economic model that dominates the digital ecosystem is the topic of the next article, “It’s the Business Model: How Big Tech’s Profit Machine is Distorting the Public Sphere and Threatening Democracy,” by Nathalie Maréchal, Ellery Roberts Biddle, Jessica Dheere, and Rebecca MacKinnon from Ranking Digital Rights. The authors argue that targeted advertising and surveillance capitalism have distorted the online sphere by incentivizing the design of platforms that are “addictive, manufacture virality, and that maximize the information the company can collect.” They call for government regulation to improve transparency and accountability of the platforms, a data privacy law that protects users, and corporate governance reform that would require companies to report on the human rights impacts of their platforms.

Turning the regulation of big tech and social media companies into an opportunity to foster media sustainability is the topic of the next article, “Sustaining Journalism During COVID-19: How the EU can turn Digital Platform Regulation into a Tool for Democracy” by Olaf Steenfadt from Reporters Without Borders. The author contends that given the way social media have altered our information ecosystem, any discussion about the role of journalism, press freedom or media policy must, by default, include regulating large technology companies. In particular, he looks at how the European Commission’s plan for a Digital Services Act (DSA) could be used to foster media sustainability by creating new mechanisms to fund the production of trustworthy news and information, and providing specific support for public interest journalism.

Finally, in their article, “Threats to Media Sustainability and Freedom of Expression in the Digital Era,” Michael J. Oghia and Mira Milosevic from the Global Forum for Media Development explain the major issues facing journalism today and highlight pathways for addressing the core problems of financial sustainability and economic viability in the digital age. These core problems intrinsically affect press freedom, access to information, and freedom of expression, they argue, calling for a wider and robust legislative conversation on the digital economy that would situate content-related issues within the wider context of market-related challenges, while clearly distinguishing content regulation from market regulation.

Conclusion

The contributions to this report address critical issues at the intersection of internet governance and the sustainability of news media and journalism. They are, however, merely a glimpse of the multitude of ways that these issues intersect in the digital sphere. What's more, they all point to the need for greater engagement by the technical community and stakeholders from across the spectrum including governmental, intergovernmental, academic, and civil society and from all regions of the world. Ultimately, this is what members of this Dynamic Coalition are committed to doing. In that respect, this report represents just one effort in pursuit of that larger goal.

The world will inevitably emerge at some point from the global health crisis caused by COVID-19. In all likelihood, the structural changes left in its wake will further increase the use of the internet as a mechanism for the exchange of news and information. Therefore, the issues examined in this report can only be expected to grow in significance in the coming years. That is why, if we want the internet to serve as a platform for social progress, we must find ways to collectively ensure that our governance of it fosters the production and exchange of high-quality news and information.

Algorithmic Removal of News Content in Serbia

Tanja Maksic

BIRN Serbia

Algorithmic removal of news content is an increasing concern among news organizations worldwide. It threatens not only a new outlet's capacity to disseminate content, but also the ability of citizens to access independent reporting. This case study showcases examples of algorithmic content removal in the Balkans with a focus on Serbia. The situation outlined here, however, is broadly applicable to other regions, including countries in the Global South, which are heavy users of social media platforms but remain "out of sight" of platform administrators since markets are poor and regulation is loose.

As [BIRN and SHARE Foundation monitoring data](#) shows, between 2014 and 2020, there were three cases of algorithmic removal or blockage of content from independent media outlets in Serbia, with an additional seven cases involving journalists and bloggers.¹ According to the same monitoring data, the number increases to 23 when we take into account incidents elsewhere in the region, as well as those targeting other stakeholders (such as CSOs and activists).

As our end results show, all of these takedowns were undue and there was no legitimate reason for removal. That is to say: the content had informative value and included public information needed for democratic debate and the free flow of information.

Although algorithmic removal of content is not massive in Serbia and the Balkans region, it is important to address this issue, not only in terms of enforcement of rules by online intermediaries, but also in terms of safeguarding the freedom of expression. The monitoring results show that there is a danger of undue reporting of civil activists and media, which comprise the majority of cases, especially as

¹ <https://monitoring.bird.tools/>

compared to the relatively small number of cases flagging disinformation and hate speech.

The named examples of algorithmic content takedowns show additional problems, primarily the lack of transparency in how the content is monitored and flagged as violating the rules. The response mechanism was also too slow, to the point of being almost non-existent, and required the assistance of lawyers and international media supporting organizations (such as Reporters Without Borders (RSF), Article 19).

For the reasons mentioned, Serbia and other Balkan countries need to be more engaged in discussions on intermediary liabilities, particularly to strengthen their positions and visibility in the inevitable formulation of new regulatory practices.

Context: Not So Captured Online Space in Serbia

The preservation of quality, independent news content is becoming increasingly difficult in Serbia.

Serbia has more than 2,000 media outlets registered with the Business Registry Agency² and the majority of them function in a poor market, which is estimated to be worth some 170-200 million EUR annually.³ State funding is a primary source of income for the majority of them.

Trends also show that the online media scene is growing (some 800 online media outlets are filed in the Business Registry Agency), as is the number of internet users. Some 4 million people used the internet on a daily basis in 2019 (77% of total population),⁴ and 70% of that number has profiles on social networks.

A small number of national and local independent media outlets can still function in Serbia's overall hostile media environment where basic freedoms are lacking. Freedom House downgraded Serbia to a "partly free" rating and described it as a "hybrid democracy."⁵ At the same time, the country is continuously dropping in score in RSF's World Press Freedom Index.⁶

² <https://www.apr.gov.rs/%D1%80%D0%B5%D0%B3%D0%B8%D1%81%D1%82%D1%80%D0%B8/%D0%BC%D0%B5%D0%B4%D0%B8%D1%98%D0%B8.1180.html>

³ <https://serbia.mom-rsf.org/en/context/economy/>

⁴ <http://publikacije.stat.gov.rs/G2019/Pdf/G201916014.pdf>

⁵ <https://freedomhouse.org/country/serbia>

⁶ <https://rsf.org/en/serbia>

Overall, the media system is being captured⁷ by the government and the ruling party, which maintain strict control over the traditional, mainstream media, dictate the overall media agenda, and have a dominant impact on the formation of public opinion. In return, these media organizations receive preferential treatment in funding from national and local governments budgets.

Investigative journalism centers and other independent media outlets are present mostly online, as that is the only available channel for them to publish content and reach their audience. As a RSF report noted, “Some courageous journalists continue to cover dangerous subjects such as crime and corruption. However, due to the high concentration of media ownership in the country, their stories are usually only available on the internet.”⁸

This situation, however, opens the door for various forms of breaches of digital rights, which range from online attacks, fake news and hate speech campaigns targeting editors and journalists, to state sponsored trolling, all amplified through social networks and algorithms. Just recently, Twitter removed nearly 9,000 accounts from its social network⁹ that were promoting Serbia’s ruling Progressive Party and its leader, President Aleksandar Vucic, thereby violating company policy on manipulation and spam.

The same online BIRN/SHARE Foundation database marks 278 violations of digital rights against journalists and media outlets in Serbia, ranging from technical attacks to threats, smear campaigns, and violations of privacy.

Due to their heavy online presence, independent media are highly dependent on social media platforms to bypass mainstream channels and bring relevant stories to readers. In such a state of play, social media platforms and the way their AI and algorithms function can help increase/decrease the visibility of independent media content, thus influencing the overall reach of news stories and the quality of public debate. These AI-powered apps determine how widely, when, and with which audiences and individuals content is shared. AI and algorithms enable targeting and personalization and, as such, have a crucial impact on content curation and content moderation.

⁷ As defined by CIMA, media capture is a form of governance failure that occurs when the news media advance the commercial or political concerns of state and/or non-state special interest groups controlling the media industry instead of holding those groups accountable and reporting in the public interest. More of this topic is available here <https://www.cima.ned.org/resources/media-capture/>

⁸ <https://rsf.org/en/serbia>

⁹ <https://balkaninsight.com/2020/04/02/twitter-axes-thousands-of-accounts-promoting-serbias-ruling-party/>

A Facebook experiment from 2017, which resulted in a dramatic decrease in the impact of media content—by as much as 50% to 80%,¹⁰ according to some estimates—clearly demonstrates this dependency. The change in the overall outline of the news feed, which was the part of experiment, didn't apply to paid posts, but highlighted the issues of lack of transparency and the lack of legal requirements on companies to announce changes to content moderation or advertising models to their users.

On top of that, independent media (and other activists) being critical towards the government are prone to undue reporting to social media administrators and subsequent content removals. More than 20 of the cases in Serbia call for more serious discussions on issues emerging from the “black box” algorithmic models of content curation and moderation, including questions of privacy and personal data harvesting practices, security and surveillance, and the free flow of information.

This becomes especially important in the context of the fight against fake news and for the preservation of original media content, which is one of the “hot topics” for EU and global policy makers. Undue content removal goes against companies' purported efforts to “clean up” the content. In Serbia, only some initial steps towards self-regulation have been made through cooperation with fact checking organizations,¹¹ however, this cooperation has yet to prove its effectiveness as it was just launched in July 2020.

Serbia's domestic media regulatory system doesn't provide an answer, as it is mostly concentrated on traditional models of governance, and even so remains poorly implemented. It doesn't provide any regulatory response, policy initiative, or public debate on the issue; rather, it adopts a passive approach that effectively places power in the hands of a small number of global platforms to regulate the content.

Relying on the self-governance efforts and good faith of companies and private entities that have no economic rationale, or any other incentive, to take proper measures to administrate content in small countries/markets, is ineffective. Therefore, major platforms tend to neglect and overlook the specifics of such markets.

¹⁰ This experiment was conducted in Serbia and 5 other countries around the world, when Facebook made a small but crucial change to its feed. Posts made by “pages”—including those of media—had been removed from the regular News Feed, the default screen, to the separate section called Explore Feed that users have to select before they can see stories.

¹¹ <https://english.istinomer.rs/analyses/istinomer-among-facebook-partners-in-fighting-disinformation/>

Overview of the Cases

BIRN and SHARE Foundation digital rights monitoring¹² shows that there were 23 cases of algorithmic removal or blockages of content in Serbia from 2014 to 2020:

1. When activist and BIRN employee Sofija Todorovic reported on an incident of an Albanian baker was attacked in Borca, her Twitter account was blocked. After SHARE foundation contacted Twitter representatives, Sofija's Twitter access was again enabled.
2. The government issued an urgent request to parliament to amend the law on lottery games, which would legalize internet filtering in Serbia.
3. The film "Land of Truth, Love and Justice" directed by Milutin Petrovic was blocked on YouTube over alleged breach of copyright.
4. President Vucic's speech in Kosovo, broadcast live by news agency Tanjug, was blocked on YouTube over copyright of the song sang by "Kosovo Peony" choir.
5. Lawyer Uros Nedeljkovic, known as @bjutidingospo on Twitter, temporarily had limited access to his account. He suspected that he was reported by users who disagreed with his views.
6. The Independent Journalists' Association of Serbia (NUNS) warned the public about censorship in the Municipality of Bujanovac. Civil servants of the municipal government were not allowed to access the news portal Tituli (titulli.com), which is a very popular Albanian-language website in the south of Serbia.
7. The Facebook profile of journalist Dragan Bursac was blocked after posting a photo of a camp for Bosniaks in Serbia during the 90s war in former Yugoslavia.
8. Facebook blocked the private account of blogger Milan Kamponeski, known as Amitz Dulniker, because of his post on The Hague's International Criminal Tribunal for the former Yugoslavia (ICTY) court verdict for Ratko Mladic.
9. The Facebook page of Pride Parade was blocked for still unknown reasons. European Digital Rights (EDRi) said that this was a case of arbitrary private censorship.
10. The Facebook account of journalist and blogger Mihailo Medenica was suspended for no apparent reason.

¹² <https://monitoring.bird.tools/data>

11. The Commercial Court in Belgrade decided to again enable access to the YouTube channel and cartoons called “Maxim’s Adventures.” The author of this cartoon informed the public about this court verdict and said that the legal battle over copyright was still not finished.
12. A statement given by Kyle Scott, US ambassador to Serbia, to the news agency Tanjug, about Informer, a daily newspaper, was blocked on YouTube.
13. In a video address, President Aleksandar Vucic commented on the statement of William Walker, former head of OSCE mission to Kosovo and Metohija, who said that he had a project for “uniting Albanians” from Albania, Kosovo, and the diaspora. This video address was blocked on YouTube.
14. A YouTube video in which ex-Yugoslav President Josip Broz Tito says that the protesting students are right was removed.
15. A video of a political rally for presidential candidate Sasa Jankovic was removed from YouTube because of unauthorized use of music. Shortly afterwards, the video first reappeared without sound, and then later reappeared once more, complete with sound.
16. KVZ Digital requested that a video showing Minister Aleksandar Vulin telling untruths about journalists Slobodan Georgiev and Dusanu Masic be removed from YouTube.
17. The online petition calling for the dismissal of Muamer Zukorlic from the position of president of the Parliament Board for Education, Science, Technological Development and Information Society, was blocked on July 7 from 14:00 to 22:00. This petition was run by academician Dusan Teodorovic.
18. All paid advertising of Booka publishing house on all Facebook and Instagram pages was blocked. After they asked Facebook why this happened, Facebook’s explanation was that they broke the rules of Facebook advertising when they used a citation from Michel Houellebecq’s book.
19. Two of BIRN’s videos were removed from YouTube over alleged breach of privacy. After some time, both videos again became available on the same addresses.
20. Facebook disabled the link to a statement by the Autonomous Women’s Center and made it impossible to share. The statement was about the verdict of the Belgrade Court of Appeals in the case of a Roma girl’s rape and it was claimed that the link violated Facebook’s standards.

21. Danas's Twitter account was blocked for seven days because the birth date written on its official account said 1997, which is when the newspaper started working. Twitter informed Danas that the account was blocked because it violated the platform's rule that users need to be over 13 years old. As soon as the misunderstanding was clarified, the account was again enabled.
22. After KZV Digital Company complained, YouTube blocked a video posted by journalists of Juzne vesti (Southern News), which showed the celebration of the opening of Hotel Nais in Nis. They explained that the video violated copyright.
23. Organizational Twitter accounts (e.g. Sabac Theater and Reflector) were suspended for no clear reason, even though they did not violate the rules of the platform. Some of them are said to have allegedly spammed users.

Out of all cases, three involved news media outlets (Juzne vesti, BIRN, and Danas), while an additional seven cases involved/targeted journalists and bloggers.

Analysis of the cases shows that breaches of copyright is the ground for removal in six cases. Copyright and intellectual property issues are essential in preserving the integrity of journalistic work and sustaining media business models. Algorithmic removals on the basis of breach of copyright are usually handled by shutting down monetization or shared monetization models (such was the case with Juzne vesti) between the media outlet and copyright holder.

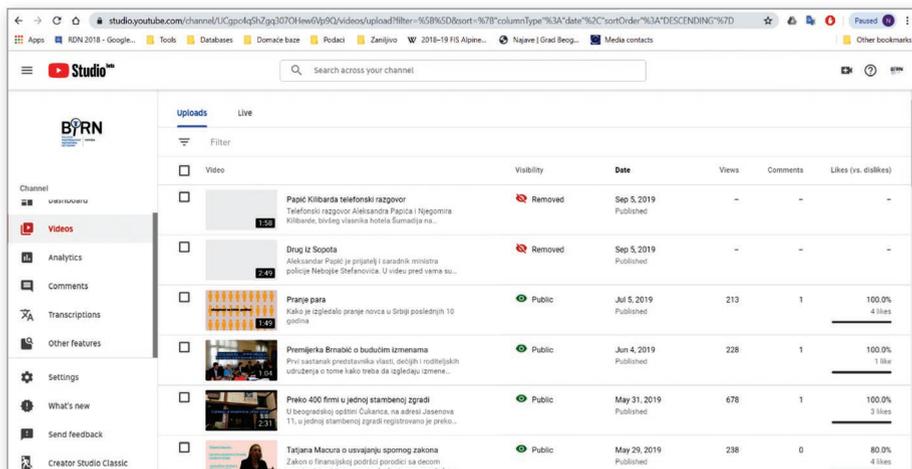
The criteria for algorithmic removal of more sensitive topics are more opaque, but still crucially important when it comes to informing the public. As other reported cases in the BIRN and SHARE Foundation data set show, other grounds for removal include breaches of privacy, and the presentation of content that was recognized by the algorithm as harmful, which usually involves controversial topics such as the status of the Kosovo/Serbia dispute, the Roma girl's rape case, and The Hague Tribunal's verdicts on war crimes. All of these are important for public debate and overall democratic discourse, but as these topics usually bring about controversy and highly polarized points of view in society, they are frequently reported to administrators.

Media are highly sensitive to content moderation. As concluded in the [*It's Not Just Content, It's the Business Model*](#) report by Ranking Digital Rights, "Content moderation algorithms work best when they have a hard and fast rule to follow. This works well when seeking to eliminate images of a distinct symbol, like a swastika. But machine-driven moderation becomes more difficult, if not impossible, when content is violent, hateful, or misleading and yet has some public interest value."

The case of the removal of the two BIRN YouTube videos depicts these key deficiencies. The videos in question were embedded in an investigative journalistic story revealing the shady business of luxurious real estate connected with the Minister of Police's associates and friends. This story can be accessed [here](#).

The videos included a recording of the telephone call between Aleksandar Papić, close friend and associate of the Minister of the Police, and the hotel owner whose property had been demolished shortly after he was negotiating a selling deal with the minister's father. In the conversation, Papić was offering a bribe to the hotel owner to cover up the unpleasant situation on the minister's behalf.

Even though the removed material was undoubtedly in the public interest, since it revealed connections between the minister's family and the violent takeover of a hotel in Belgrade, as well as the origin of the money used for its purchase and the development of luxurious property throughout Serbia; YouTube removed it due to violation of privacy.



Before the videos were removed, YouTube notified BIRN that the videos were reported due to violation of privacy and that the company is examining them. BIRN was offered 48 hours to amend the material ourselves (e.g. blur the faces, change content), but with no indication of the time stamp or indication of a concrete problematic part to be reviewed.

After the initial notification, BIRN received another email informing us that the content was removed. There were no other explanations nor details, and BIRN's status as an investigative media outlet was not acknowledged. It took seven days

for the video to be restored to YouTube's platform. In the fast-paced news cycle, seven days can mean that news has lost its value and its impact is diminished, which is yet another mechanism to curb the free flow of information.

BIRN Serbia Director Dragana Zarkovic Obradovic said of the incident, "BIRN Serbia works under continuous smear campaigns run by top state officials and sponsored trolling on social networks. Due to sensitivity of the topic, our guess is that we were subject to undue reporting with the goal to stop spreading the story findings."

YouTube's response mechanism was slow and ineffective (all emails that were listed in YT guidelines were not functioning and all of BIRN emails to them were returned, and there was no response from the Help Center). So, effectively, there was no mechanism to submit the dispute and ask for a review of the decision.

The overall procedure took too long and was only resolved through engagement of an intermediary and support from international, well-established media supporting organizations such as RSF.

Conclusions and Recommendations

Much of the change caused by technological innovation comes from the most developed countries (especially the USA where the largest technology companies, such as Google, Facebook, Amazon, and Twitter, are headquartered) but these changes equally affect the media in less developed societies. That is why it is important that decision-makers, and the media industries of less robust systems, understand the changes that are fundamentally transforming the media environment and participate in setting new standards for the profession.

These transformative processes should be based on the following principles: keeping the internet open and free; safeguarding the integrity of the media, which are still guardians of the public and open forums for social debates in the new, digital environment; fostering a plurality of opinions and a smooth flow of information; and creating economically viable media that have enough knowledge and capacity to follow trends and introduce innovations.

As algorithms have such profound impact on our freedoms of expression, access to information, and overall public debate, we recommend the following:

For Companies

- The way algorithms work, the criteria they use, and their machine learning processes, are still not fully developed to recognize the nuances of context, therefore human intervention is still needed.
- More transparency in the way algorithms work (what criteria they use to boost certain content and remove others) is required.
- Human rights perspectives, especially as relate to freedom of expression, should be taken into more consideration when designing the algorithms. Often the criteria for content amplification favors monetization, which is very often in contrast to the public interest.
- Algorithms function best when fed large data sets, which then leaves the small markets, with small numbers of users or specific languages (such as Serbian or other Balkan languages), prone to neglect. Companies should pay due attention to extending operations in these areas, in order to ensure plurality and diversity.
- Companies should intensify cooperation with local fact checkers in order to limit the spread of false information.
- Media should be recognized by platforms as entities that have a specific role in informing the public (see, for example, the Reporters Without Borders Journalism Trust Initiative (JTI), or the latest Facebook and Google attempts to make original media reporting more visible). Likewise, there should be more efficient mechanisms to resolve media content disputes.
- As Serbia and the majority of Balkan countries, as member of the Council of Europe and the OSCE, largely follow EU regulations platforms should apply the EU's regulatory system in the Balkan area.

For Decision Makers

- New information models require new policy solutions, such as co-regulatory systems which would hold social media companies accountable for content curation and moderations systems.
- Initiate inclusive and transparent policy dialogue with all relevant stakeholders, including those from the private sector, media, civil society, and academia, to discuss media freedom and freedom of expression in a digital environment.

For Media

- Apply the highest ethical and professional standards to minimize harmful, dishonest and false content. Ethical and professional standards should be regularly revised and improved in order to respond to new realities.
- Apply digital security protocols to prevent (as much as possible) online attacks, organized smear campaigns, and undue reporting to platforms.
- Develop strategies for placement of content across various platforms and communication channels in order to avoid dependence on the monopoly on the social media platform market.

Facebook Bias Against Sexual and Reproductive Health and Rights Advertisements? A Case Study of the Love Matters Global Network

Anastasiya Pak and Anna Hengeveld

RNW Media

Young people's lives are increasingly influenced by the social media platforms that have become their main channel to access information, express themselves, organise and mobilize. With more than 70% of the world's youth online,¹ digital technologies play a central role in young people's access to information.² The rise of online polarisation, hate speech and misinformation along with censorship have led to a lack of trustworthy sources of information and safe online spaces in which to exchange diverse viewpoints constructively. Within this context, independent media and media development organizations play a crucial role in ensuring young people have access to diverse, reliable and quality content.

Social Media as a Tool to Inform Young People About Their Rights

RNW Media is a (digital) media development organization that fights for the right of young people in restrictive settings to access rights and evidence-based information. RNW Media builds digital communities for social change—using websites, WhatsApp, Facebook, Twitter, Instagram and other channels—to create safe online spaces where young people can come together, access information on

¹ The proportion of young people aged 15-24 using the internet (71%) is significantly higher than the proportion of the total population using the internet (48%).

² ITU, 2017, ICT Facts and Figures, <https://www.itu.int/en/ITU-D/Statistics/Documents/facts/ICTFactsFigures2017.pdf>

the issues that matter to them, engage in dialogue and mobilize to advocate for change. The organization focuses on three thematic areas: sexual and reproductive health and rights (SRHR); social cohesion and inclusive governance; and economic inclusion. Young people are active on social media, so the organization focuses on social media platforms to be able to engage with a young audience.

Social media platforms, such as Facebook, play an ever-increasing role in the way citizens around the world access media content and directly impact their ability to access diverse sources of information. Changing Facebook policies have significantly affected the ways in which we, as an organization, can reach our audience and the type of content we can offer them. As is the case for Facebook pages in general, our ability to reach our audience organically has decreased in recent years.³ In order to ensure a wider reach for our content and to be able to engage with young people on Facebook, we have to rely increasingly on paid advertisements. Facebook's content moderation policies, which are based on their Community Standards, Terms of Service as well as Advertisement Policies, have led to the disapproval of certain advertisements focused on informing and educating young people about issues that matter to them.

Content moderation⁴ has become a much-debated issue in the context of freedom of expression and access to information. It has an impact on both user-generated content and on the advertisements of media organisations and independent media active on Facebook. Content moderation policies can violate freedom of expression and information.⁵ According to Ranking Digital Rights 2020, Facebook provided some information about the content moderation of advertisements, but it is still impossible to evaluate Facebook's process for rejecting specific ads.⁶ Moreover, content moderation seemingly has a disproportionate effect on silencing the voices of already marginalized groups, including women.⁷

³ <https://hootsuite.com/resources/the-state-of-digital-in-q3-2019>; <https://www.facebook.com/business/news/Organic-Reach-on-Facebook>

⁴ Content moderation is the practice through which social media platforms make decisions about whether to host certain content (<https://www.accessnow.org/cms/assets/uploads/2019/05/AccessNow-Preliminary-Recommendations-On-Content-Moderation-and-Facebooks-Planned-Oversight-Board.pdf>).

⁵ <https://www.newamerica.org/oti/reports/its-not-just-content-its-business-model/>

⁶ <https://rankingdigitalrights.org/wp-content/uploads/2020/03/pilot-report-2020.pdf>

⁷ <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G18/096/72/PDF/G1809672.pdf?OpenElement>

Censorship of SRHR Advertisements

Content moderation policies often run the risk of censoring content and limiting the right to access information especially when it comes to sensitive topics such as sexual and reproductive health and rights (SRHR). Within the context of the current COVID-19 crisis, in which SRHR are increasingly under pressure, this has become an even more pressing issue.⁸ A recent UNESCO study on how young people learn about their bodies, sex, and relationships found that 29 percent of young people identify digital spaces as their main source of information on SRHR. Moreover, a majority of young people access such content on social media.⁹ Therefore, censorship of content and advertisements about SRHR, on social media in particular, undoubtedly has an impact on young people.

Facebook's content moderation policies have been widely criticized for seemingly having a negative impact on SRHR related content and advertisements. Facebook bans ads and other content that it deems "overly suggestive or sexually provocative."¹⁰ This affects both non-profit organizations, as well as companies promoting SRHR information and products, who have had their ads disapproved by Facebook.¹¹ The way this can negatively affect media development organisations such as RNW Media is illustrated by the experience of the Love Matters Global Network members when informing young people about their SRHR via Facebook. According to the Association for Progressive Communications, "sexual content" is regulated due to government legislation, terms of use and standards of internet service providers, and automated solutions which can be incorrect or have a built-in cultural bias. However, sexual content itself can also contain important information about SRHR for young people.¹²

⁸ <https://www.guttmacher.org/article/2020/06/covid-19-could-have-devastating-effects-adolescents-sexual-and-reproductive-health>; <https://www.rnw.org/news/safeguarding-youth-srhr/>

⁹ <https://unesdoc.unesco.org/ark:/48223/pf0000373884>

¹⁰ <https://www.eff.org/nl/deeplinks/2019/04/content-moderation-broken-let-us-count-ways>

¹¹ <https://www.theatlantic.com/health/archive/2015/03/when-social-media-censors-sex-education/385576/>

¹² <https://www.apc.org/en/pubs/issue/media-brief-censorship-sexuality-and-internet>

Love Matters Global Network Case Study: Data on Ads Rejections 2015–2020

Despite the lack of transparency in Facebook’s content moderation on advertisements, RNW Media’s Love Matters Global Network has managed to generate some interesting data on disapproved ads. The Love Matters Global Network is part of the SRHR programme of RNW Media, with member organizations in India, Mexico, Kenya, Nigeria, the Democratic Republic of Congo, Egypt, and China. The network members all implement the unique Love Matters model to support safe, healthy, pleasurable sex, love, and relationships for young people. Although the different organizations adapt their content and ads to the local context, the topics addressed are relatively consistent and are all focused on SRHR. Therefore, this data provides interesting insights into how Facebook’s ad rejections affect young people’s access to information about their SRHR across the different country level platforms.

From 2015 until August 2020, a total of 1,792 ads from six Love Matters platforms were rejected.¹³ Recently retrieved data on 2020 shows that during the period from January 1st 2020 to July 31st 2020 a total of 91 ads were rejected across the six different Love Matters platforms. The majority of advertisement rejections in 2020 took place in the Democratic Republic of Congo (66), Egypt (15), and Kenya (5), but there were also instances in Nigeria and Mexico.

Facebook’s categorization naming system produces in one or two words the ‘reason’ for ad rejection. Of all rejected ads, 24.2% are categorised as “Adult Content”, followed by “Sex Toys” (18.7%). Most of the rejected ads are flagged due to a sexual aspect, apart from 9.9% tagged as possible “Ad Farming” and 8.8% as “Landing page fail”.

¹³ Love Matters China could not be included in this study due to censorship restrictions on Facebook. However, Love Matters China is also affected by censorship on the Chinese social media platform WeChat.

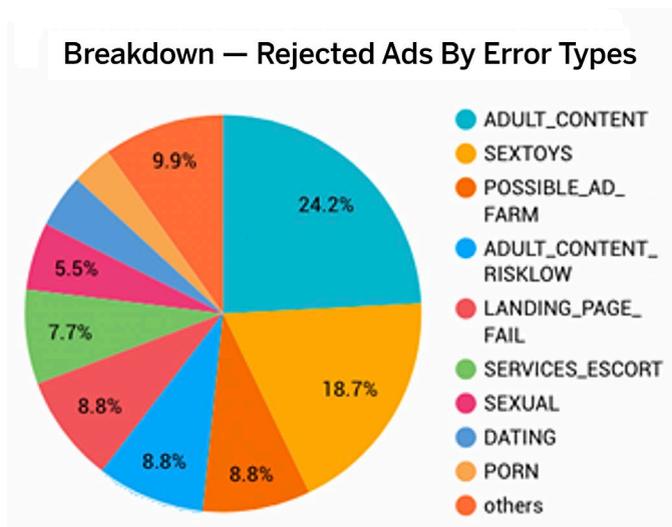


FIGURE 1: Rejected ads by error types in 2020

When looking at Facebook's categorization of ads, a major issue seems to be that the different 'sexual content' categories conflate content such as pornography and explicit nudity with SRHR content that has an educational or informative purpose. In general, it appears mis-categorization is a significant issue. The below examples (figure 2 and 3) are clearly not pornographic nor are they sex publications. Similarly, the examples in figure 4 and 5 are both classified as adult content, while the extent to which sexuality is addressed differs greatly. The example from Love Matters Egypt (figure 4) definitely does not illustrate adult content. These examples also suggest that Facebook is not applying their standards consistently across the different Love Matters platforms.

Facebook Bias Against Sexual and Reproductive Health and Rights Advertisements?
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FIGURE 2:
Facebook classified this ad as “sex publications”.



FIGURE 3:
The post says “Do you know about emergency contraceptive pills and their side effects?” Facebook classified this add as “porn”.



FIGURE 4:
The post says: #Discussion question How does the spread of the Coronavirus affect your sexual and romantic life? Facebook classified this ad as “adult content”.



FIGURE 5:
The post mentions “sex positions”. Facebook classified this add as “adult content”.

Although Facebook’s Advertising Policy seems to suggest that every advertisement is reviewed individually, our data suggests otherwise. We see on a regular basis that once one advertisement is flagged, other ads will be turned down automatically for the same reason, without being reviewed. The example below shows four different ads addressing varying topics which were turned down on the same day, with the classification: “Services Escort”.

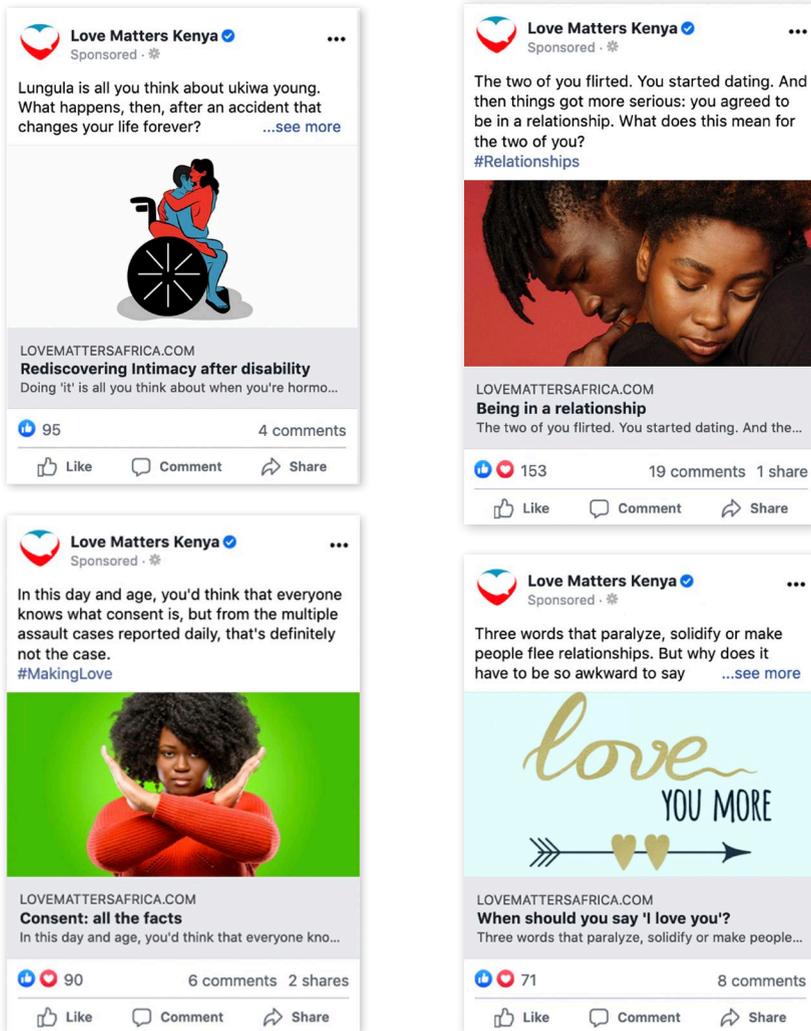


FIGURE 5: 4 different ads flagged as “Services Escort” on the same day. Facebook error message says, “we don’t allow ads that promote escort services”.

Interestingly, when comparing the number of disapproved ads from 2015 till mid-2020, the number of rejected ads per year has decreased by 50 percent since 2019. When looking at the individual platforms we can draw the following conclusions. The Love Matters platforms in the Democratic Republic of Congo, India and Egypt have a sound approval-disapproval ratio, which means the number of approved ads is much higher than the disapproved ads in the same period. The platforms in Mexico and Kenya have been struggling since the number of rejected ads has exceeded the number of approved ads for several years. However, it is impossible to verify whether this is due to changes in Facebook's policies, less reliance on advertisements, or the creation of ads in strict compliance with Facebook's policies.

How Does This Affect Love Matters Platforms?

To educate young people on their sexual and reproductive health rights, it is essential to ensure that social media platforms are a safe space for freedom of expression. This is especially relevant in light of the major role digital spaces play in sexuality education among young people.¹⁴ Yet the data above shows that SRHR content in digital spaces is consistently restricted by commercial gatekeepers such as Facebook.¹⁵

Love Matters platforms encounter many challenges when publishing their SRHR-related content and promoting it through ads. On several occasions, the ads accounts of some Love Matters platforms have been blocked for months. Love Matter Kenya's ads account, for example, was blocked from August 2019 to March 2020. The ban was only lifted after written appeals were made to Facebook in December 2019 and January 2020. During this period, Love Matters Kenya had to rely on the organic reach of their Facebook page in order to be able to inform young people on their SRHR.

Several of the Love Matters platforms' social media editors perceive that many of the topics they work on cannot be addressed in Facebook advertisements. According to Love Matters Kenya's social media editor this is up to 80 percent of the content, especially when it comes to topics such as sex, problems around sexual relationships, and LGBTQ-related content. The Love Matters Arabic social media editor says, "If Facebook did not have these restrictions, I would have been able to reach more people and make more impact.[...] In order to create change, I need to talk to people who are not aware of these topics and who are not on the same page as me."

¹⁴ <https://unesdoc.unesco.org/ark:/48223/pf0000264649>

¹⁵ Oosterhoff et al. 2017 as cited in <https://unesdoc.unesco.org/ark:/48223/pf0000264649>

Furthermore, several studies suggest that Facebook regulations on sexual and adult content disproportionately affect women and result in censorship of marginalized populations.¹⁶ This impact may vary regionally. Although previous research on ads rejections of the Love Matters platforms also established that ads targeted at women were rejected more frequently than those targeted at men, this correlation was not found in the data for 2020. However, Love Matters' social media editors do perceive this impact. For example, they are not able to publish ads on menstruation or showing a pregnant woman's belly. "Ads disapprovals really limit the ability of women to get information. For some women, social media is the only channel to access information. They would go to a cybercafé just to look at Facebook, because they don't have phones," according to Love Matters Kenya's social media editor.

In terms of regional differences, cultural norms and Facebook's understanding of the region appears to impact the ways in which women's health content is disapproved or taken down. It seems that ads reported on by users based on existing cultural norms are subsequently rejected more often. "In the Middle East, the topics we talk about on our platform may be considered sensitive. People are very resistant to talking about sex and women's rights. Facebook is a business, and it follows the trends and shows what people want to see on their platform," adds Love Matters Arabic's social media editor. The Head of Love Matters India also confirms the understanding that "Facebook's algorithms on content moderation are influenced by their understanding of the region. Obviously, if the majority of Facebook users in India are men, Facebook uses algorithms that attend to the needs of men."

The editors of the Love Matters platforms are constantly adapting to find creative ways around potential disapproval of their ads and continue to inform young people on their SRHR. To be able to continue to publish ads, the social media editors avoid certain topics or images and apply a range of mitigation strategies: "sometimes, we are playing with words. Instead of saying *sexual relationship* we would for example, say *marital or intimate relationship*. I use different words that will not be recognised by the machine," Love Matters Arabic's social media editor says. Love Matters Kenya's editors also play with words and use Swahili or local slang to avoid automated recognition of certain terms by Facebook. Despite such strategies, the reoccurrence of content takedown and ads disapproval severely limits the opportunities to promote SRHR-related content for many organisations such as ours.

¹⁶ <https://www.eff.org/deeplinks/2017/12/adult-content-policies-textbook-private-censorship-fail>; <https://unesdoc.unesco.org/ark:/48223/pf0000373885>

Lack of Transparency and Possibility to Appeal of Facebook's Content Moderation Policy

Are there any clear conclusions we can draw from these insights—on how and when advertisements get disapproved based on Facebook's policies? Not really—but that is partly the issue. There is a lack of clarity and transparency around these content moderation policies. Moreover, the experience of the Love Matters Global Network members has shown that attempts to appeal decisions are time consuming and complicated and Facebook often fails to respond.

First of all, there is a lack of clarity around the content moderation policies, including the application of the Community Guidelines, Terms of Service and Advertising Policy. "If you read community guidelines of any social network, you can find them very vague and vast. What is nudity, in their opinion, for example? Is it a completely nude person or it is a person in a swimming suit? It is very generic and unspecific, so it is hard to know what Facebook means," Love Matters Arabic's social media editor says. Facebook should ensure their policies are sufficiently clear and in line with international human rights standards. Also, as the Head of Love Matter India points out, there should be more information on how their standards are applied in practice. Especially with regard to SRHR content, it should be clear how Facebook distinguishes between 'harmful sexual content' and content with an educational purpose.

Secondly, there is a need for more transparency around Facebook's content moderation policies regarding the application of their Advertising Policy. There is a need for transparency on why advertisements are rejected and the role certain tools, such as user reporting, algorithms, and human content moderation play in this process. Currently, it seems that existing biases around sexuality in general, and women's health in particular, play a role in the ad approval process, whether automated or by human review. This can possibly further reinforce inherent biases. Transparent reporting on these decision-making processes and detailed information on content removals, ads rejections and appeals received would create more insight around this.

Finally, the appeals process for Facebook's advertisements is complicated and time-consuming. According to [the RDR Index](https://rankingdigitalrights.org/index2019/companies/facebook/index/) 2019, Facebook had one of the lowest scores of any tech company in the Index for its appeals mechanisms.¹⁷ In 2018, Facebook kickstarted a new process for remedying wrongful takedowns,¹⁸ but it

¹⁷ <https://rankingdigitalrights.org/index2019/companies/facebook/index/>

¹⁸ <https://about.fb.com/news/2018/04/comprehensive-community-standards/>

was unclear “if the scope of this appeals mechanism includes any type of violation to its Community Guidelines”.¹⁹ “The appeal process is not very straightforward, and it is about advocacy work with people from Facebook directly. Every time our content is taken down, I send a direct email to Facebook contact persons, that’s how we manage to get attention for the problem and put in requests to resolve the issue,” says the Head of Love Matters India. Thus, there is a need for a clear appeals mechanism that provides a timely response.

Although we acknowledge that a balance needs to be struck between public safety and freedom of expression, measures taken by tech companies such as Facebook risk excessive censorship of content and thus reduce young people’s access to diverse viewpoints and nuanced educational information, especially in relation to their SRHR. Moreover, as also recognised by the former UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression David Kaye, some of these measures may particularly threaten independent and alternative sources of information.²⁰ Kaye stressed that a “lack of clear and transparent rule-making and enforcement, weak and inconsistent consideration of context, extensive reliance on automation, and a lack of any meaningful appeals process and remedies” are problems that need to be addressed.²¹ RNW Media echoes the recommendations of the UN Special Rapporteur as well as various international organizations and NGOs, and calls upon social media platforms to ensure their policies are human rights based, clear and transparent and that they have an effective appeal system in place.²²

¹⁹ <https://rankingdigitalrights.org/index2019/companies/facebook/index/>

²⁰ HRC, UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression report A/HRC/38/35, 2018.

²¹ HRC, UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression report A/HRC/38/35, 2018.

²² HRC, UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression report A/HRC/17/27, 2011; <https://santaclaraprinciples.org/>.

The Politics of Labels: How Tech Platforms Regulate State Media

Courtney C. Radsch

Committee to Protect Journalists

Figuring out which news media are propaganda arms of the states that fund them, and which ones provide a public service and are insulated from editorial interference by government has become the latest flashpoint in the debate over content moderation on social media. Over the past two years, YouTube, Facebook and Twitter have all implemented new policies for state-linked media outlets that they say are aimed at improving transparency amid growing calls for regulation of the social media platforms and concerns about foreign influence operations.

Efforts to categorize news media are not only about labels, however. They are accompanied on Facebook and Twitter by some restrictions on advertising, targeting, and algorithmic amplification. Shadow banning tactics may affect visibility and monetization. The implications of these policies for news media are multifaceted and underscore the importance of transparency for media ownership and editorial standards, and not just for public or state media.

This article describes the measures taken by the three dominant social media platforms in the journalistic ecosystem—Facebook, YouTube, and Twitter—and the issues they raise for media sustainability and independent media. It illustrates a critical issue in internet governance that has significant ramifications on media organizations and journalists, which depend on these platforms to reach an audience.

These classification efforts amount to a form of self-regulation that appear aimed at staving off government interference amid increased calls for government regulation. However, to determine the impact of these self-regulatory mechanisms, platforms must increase transparency around both the process for making determinations, as well as the impact of these determinations on the media

outlet, including making data available to independent researchers. If data sharing and analysis does not improve, then regulators must mandate it. This paper also argues that limiting informational efforts to state and public media is insufficient to achieve the stated goals of the policies, one of which is to improve media and information literacy. Increasing transparency about media ownership and editorial independence should be extended to a greater array of news outlets. Moreover, the platforms have an opportunity to use their influence to encourage more transparency from media organizations themselves, which could help improve accountability and advance media and information literacy more broadly.

Background

State media labels and advertising restrictions are the latest in a slew of new policies and tools that social media firms have rolled out over the past few years, as they seek to respond to demands that they do more to stave the flow of “fake news” and fight back against information operations and platform manipulation. The Facebook and Twitter initiatives specifically have been implemented amid concerns about the COVID-19 “infodemic,” Chinese propaganda related to the Hong Kong protests, and political interference ahead of the U.S. presidential election in November 2020.

Top officials at the major social media networks have been hauled before congress to explain how Russian content spread with such abandon through their networks and what they were going to do to combat the misinformation campaigns that had done so spectacularly well on their platforms.¹ A UK Parliamentary inquiry called for an independent regulator to impose a compulsory code of ethics on companies perceived to enable the spread of “fake news,” with the power to bring legal action against them for violations.²

News organizations, meanwhile, struggle to ensure that their journalism is visible on these platforms amid an influx of counterfeit news, propaganda, and state-directed information operations that have become increasingly prevalent and often

¹ Congressional Antitrust Hearing, July 29, 2020. <https://www.rev.com/blog/transcripts/big-tech-antitrust-hearing-full-transcript-july-29>; Open Hearing On Foreign Influence Operations’ Use Of Social Media Platforms (Third Party Expert Witnesses). Hearing Before The Select Committee On Intelligence Of The United States Senate One Hundred Fifteenth Congress Second Session Wednesday, August 1, 2018. <https://www.intelligence.senate.gov/sites/default/files/hearings/CHRG-115shrg30959.pdf>; Senate Committee on the Judiciary, Subcommittee on Crime and Terrorism on Extremist Content and Russian Disinformation Online: Working with Tech to Find Solutions, Oct. 1, 2017. <https://www.judiciary.senate.gov/meetings/extremist-content-and-russian-disinformation-online-working-with-tech-to-find-solutions>.

² <https://www.parliament.uk/business/committees/committees-a-z/commons-select/digital-culture-media-and-sport-committee/news/fake-news-report-published-17-19/>

include a role for state-backed media organizations.³ One [analysis](#) showed that counterfeit news articles far outperformed legitimate news articles on Facebook during the 2016 U.S. presidential election.⁴ An [MIT study](#) found that false stories outperformed truthful stories on social media, spreading faster and further across all topics, especially politics, with humans more likely to spread false news than bots.⁵ During the 2019 protests in Hong Kong, Twitter [found](#) that China was using the platform to undermine the legitimacy of the pro-democracy movement, prompting the Silicon Valley-based firm to suspend several Chinese accounts and consider how to reduce the prevalence of foreign influence operations. And amid the COVID-19 pandemic, state-backed media outlets have produced significant quantities of information and propaganda, which outperformed articles from prominent independent news outlets on social media, according to researchers.⁶

Social media platforms have become central to contemporary journalism, and the policies and algorithmic choices that platforms devise have a critical impact on the visibility and viability of news outlets. Most of the audience for news publishers comes through Facebook referrals or Google search.⁷ The platforms' role as gatekeepers helps explain why decisions around labeling, advertising, and amplification of state and public media are so consequential.

According to Reuters Institute Digital News Reports, the growth of social media for news consumption rose steadily until 2017, when more than half of all online users across the 36 countries surveyed (54%) said they used social media as a source of news each week.⁸ And while people may get their news from a range of traditional and social media, the majority (53%) preferred to use algorithmically-driven interfaces such as social media, search engines, or news aggregators to

³ Christina Nemr and William Gangware for Park Advisors. Weapons of Mass Distraction: Foreign State-Sponsored Disinformation in the Digital Age. March 2019. <https://www.state.gov/wp-content/uploads/2019/05/Weapons-of-Mass-Distraction-Foreign-State-Sponsored-Disinformation-in-the-Digital-Age.pdf>.

⁴ Craig Silverman. "This analysis shows how viral fake election news stories outperformed real news on Facebook," BuzzFeed News, 16 November 2016; www.buzzfeed.com/craigsilverman/viralfake-election-news-outperformed-real-news-on-facebook/.

⁵ Soroush Vosoughi, Deb Roy and Sinan Aral. "The spread of true and false news online Science." 09 Mar 2018: Vol. 359, Issue 6380, pp. 1146-1151. <https://science.sciencemag.org/content/359/6380/1146>

⁶ Katarina Rebello, Christian Schwieter, Marcel Schliebs, Kate Joynes-Burgess, Mona Elswah, Jonathan Bright & Philip N. Howard. "Covid-19 News and Information from State-Backed Outlets Targeting French, German and Spanish-Speaking Social Media Users." Data Memo 2020.4. Oxford, UK: Project on Computational Propaganda. <https://comprop.oii.ox.ac.uk/wp-content/uploads/sites/93/2020/06/Covid-19-Misinfo-Targeting-French-German-and-Spanish-Social-Media-Users-Final.pdf>

⁷ Kevin Tran. Publishers are trying to navigate Facebook's algorithm change. Jun. 27, 2018. <https://www.businessinsider.com/publishers-navigate-facebooks-algorithm-change-2018-6>; Newman 2017 and 2018, *ibid*

⁸ Nic Newman. Reuters Institute Digital News Report 2018 and 2017.

access news, rather than directly visiting news websites, apps, or human-driven interfaces.⁹

As policymakers continue to probe the dominance of the social media platforms—and their role in facilitating the global spread of disinformation that influences decision-making about elections and other democratic institutions—companies are hoping that self-regulation helps preempt government regulators from stepping in.

Social Media Platform Policy

Google, Facebook, and Twitter have all rolled out labels for some state-affiliated media outlets on their platforms, though they are applied to only a fraction of such outlets. Facebook and Twitter restrict the ability of labeled entities to advertise on their platforms or target U.S. audiences, and restrict the algorithmic amplification of these outlets in their recommendation systems. The potential to reduce the visibility of these channels, some of which may be state-affiliated or controlled but rely fully or in part on private advertising, could have negative repercussions on the financial sustainability of some outlets. The section below describes the approach and rationale of each of these three platforms, in the order that they implemented labels, and concludes with a discussion of how media are reacting.

Google

With more than two billion users consuming content in 80 languages across 100 localized versions of the video platform,¹⁰ YouTube has become a core part of most media outlets dissemination strategy. Google was the first major social media company to roll out labels for state media outlets on YouTube in a 2018 pilot initially introduced in the United States and rolled out over the past two years in more than 20 countries, primarily in Europe and the Asia Pacific regions.¹¹ The designation only appears in English, however, not the local languages, according to company officials.¹² The platform now differentiates labels for content from state-funded and publicly-funded news outlets based on information gleaned from Wikipedia. According to a post by Google when it first announced the policy, information about

⁹ Nic Newman. Reuters Institute Digital News Report 2018. P. 13.

¹⁰ Accessed Aug. 31, 2020 <https://www.youtube.com/about/press/>

¹¹ See https://support.google.com/youtube/answer/7630512?p=publisher_transparency&visit_id=1-636531077201178201-1911216465&rd=1 accessed Aug. 5, 2020

¹² Interviews and correspondence with Google officials who were not authorized to speak on the record in July and August, 2020.

ownership originates from Wikipedia, or other “independent third-party source,” and “does not reflect a determination made by YouTube.”¹³

The label appears only on the videos themselves, but not in the About section for the channel or search results. The designation “does not affect any of the features or monetization eligibility of the videos,” according to the company.¹⁴

The labels are not systematically applied and there is no apparent logic to how outlets are identified or why specific countries are covered or not. A review I conducted in March 2018 of 37 state-funded media outlets on YouTube.com found that 19 included notices, and the rest did not.¹⁵

Facebook

Facebook, with more than 2.7 billion active monthly users, 1.79 billion active daily users, and more than one billion stories shared each day,¹⁶ is arguably the most influential and consequential platform for contemporary journalism. It is rare for media outlets not to be on Facebook, and the platform’s policies influence journalistic decision-making. For example, when Facebook decided to prioritize video in 2015, publishers pivoted to video.¹⁷ When it decided in 2016, and then again in early 2018, to de-prioritize media in favor of “meaningful” content from friends, news organizations suffered.¹⁸

Facebook announced in late 2019 that it would begin identifying media content and ads from outlets as “state-controlled” if they were “wholly or partially under the editorial control of their government,” excluding public service media; in June 2020, after consulting with 65 experts and organizations, including this author on behalf of the Committee to Protect Journalists, it began implementing the new

¹³ Accessed Aug. 29, 2018 https://support.google.com/youtube/answer/7630512?p=publisher_transparency&visit_id=1-636531077201178201-1911216465&rd=1

¹⁴ Accessed Aug. 31, 2020 https://support.google.com/youtube/answer/7630512?p=publisher_transparency&visit_id=1-636531077201178201-1911216465&rd=1

¹⁵ Courtney C. Radsch. YouTube labels on public broadcasters draw ire in US, Russia. CPJ.org. March 15, 2018 <https://cpj.org/2018/03/youtube-labels-on-public-broadcasters-draw-ire-in/>;

¹⁶ Accessed Aug. 31, 2020 <https://about.fb.com/company-info/>, and <https://zephoria.com/top-15-valuable-facebook-statistics>

¹⁷ What the Shift to Video Means for Creators. Facebook Newsroom. Jan. 7, 2015. <https://media.fb.com/2015/01/07/what-the-shift-to-video-means-for-creators/>; Will Oremus. The Big Lie Behind the “Pivot to Video”. Slate. Oct. 18, 2018. <https://slate.com/technology/2018/10/facebook-online-video-pivot-metrics-false.html>; Matt Taibbi. Who Will Fix Facebook? Rolling Stone. Nov. 26, 2018. <https://rollingstone.com/politics/politics-features/who-will-fix-facebook-759916/>

¹⁸ Mark Zuckerberg. Jan. 18, 2018 <https://www.facebook.com/zuck/posts/10104413015393571>; Lucia Moses. Uh-oh, some publishers see a drop in Facebook traffic. Digiday. April 8, 2016 <https://digiday.com/media/publishers-just-saw-decline-facebook-traffic/>

policy.¹⁹ Facebook uses the term “state-controlled” and analyzes information about editorial standards, ownership and funding transparency, and other factors to make its determination. Labels are not applied to publicly-financed public service media.

The labels appear in a transparency box on the side of the Facebook Page, the Ad Library Page view, and on Pages, as well as on posts in News in the U.S., [with plans](#) to roll out to specific posts and Instagram.²⁰ The company adopted a qualitative methodology for determining the level of editorial independence from the state that included review of company documents such as budgets, editorial standards, coverage, corrections policy, and other documents, not all of which are publicly accessible, according to interviews with several news outlets. As of August 2020, the label had been applied to approximately 200 different Pages, said Sarah Shirazyan, Facebook’s stakeholder engagement manager for content policy, who helped develop the new policy.²¹ Facebook did not clarify how it determined which outlets and regions to focus on in its initial rollout. And although outlets can appeal the label determination if they believe it is inaccurate, outlets expressed concern about the transparency of this process.

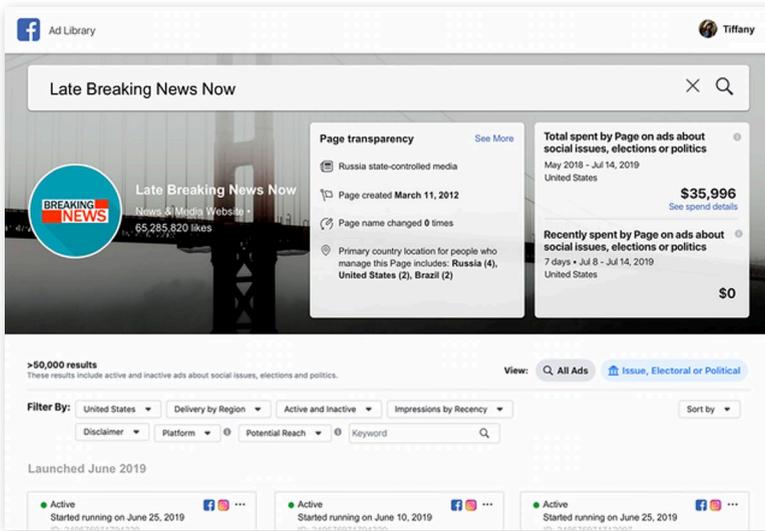
“The purpose of the labels are to provide context on the video that people are viewing, not to dissuade people from viewing content, but to understand that the content they are viewing is coming from a government channel,” explained a company official who was not permitted to speak on the record because of company policy.²² The other platforms echoed this sentiment.

¹⁹ Accessed July 31, 2020 <https://about.fb.com/news/2020/06/labeling-state-controlled-media/>

²⁰ Accessed November 2, 2019 <https://about.fb.com/news/2019/10/update-on-election-integrity-efforts/>

²¹ Correspondence with Sarah Shirazyan, stakeholder engagement manager for content policy, Facebook, Aug. 5, 2020.

²² Correspondence with a Facebook employee, July 2020.



Sample screenshot showing placement of label provided by Facebook

The designation also has potential viewership and financial implications. Facebook will label ads from those publishers and block paid advertising in the U.S.A. The financial impact of this is not clear. According to Nathaniel Gleicher, head of cybersecurity policy at Facebook, “state-controlled media outlets rarely advertise in the U.S.”²³ But given that there is no existing list of these outlets, and the company has said it is unable to scale the new policy globally, this statement is unsubstantiated. Furthermore, some media outlets disagree on the designations assigned to them by the platforms, worry that it could change, or see the new policy as an existential threat to their viability.

Maffick, a company that runs Facebook Pages and Instagram accounts for outlets including In the NOW, with nearly five million followers, Waste-Ed, and the opinion site Soapbox, [filed a lawsuit](#) claiming Facebook’s designation of its outlets as “Russia state-controlled media” was inaccurate and defamatory. It received funding from an RT subsidiary, according to [reports](#), although Maffick CEO Anissa Naoui disputed this in an interview and said that, as a private media company, it relies heavily on advertising to drive revenue.²⁴

²³ <https://about.fb.com/news/2020/06/labeling-state-controlled-media/>

²⁴ Interview with Anissa Naoui, CEO, Maffick LLC.

Naoui said In the Now, which focuses on human interest videos, had experienced a significant decrease in traffic and monetization while experiencing an increase in negative comments. The number of monthly views in July, the month following Facebook's implementation of the policy, dropped to about 66 million as compared to more than 247 million in May. The channel saw a 60 percent drop in user "likes" and an 85 percent decline in monthly monetization.

"Facebook has massive influence and can, through one false statement on a user's page, shift the public opinion of millions of people around the world," states the lawsuit, echoing a point made by Al Jazeera and Voice of America (VOA).

Facebook disputes the lawsuit and said it will defend itself.²⁵

Twitter

With about 330 million active monthly users, Twitter is far smaller than YouTube and Facebook but is integrated into journalistic routines and is influential among journalists themselves.²⁶ Given U.S. President Donald Trump's extensive use of the platform for announcing and influencing policies, it has become particularly central to political reporting. Its revenues are a fraction of those of Facebook or Google, and it is thus able to forgo monetization and adopt policies that may be perceived to reflect a more principled stand, given that the stakes are lower, as is the case with its decision to ban political advertising, for example.²⁷

Twitter was the last of the three major social media platforms to introduce state media labels, which appear on the account profile and are visible in individual tweets. It landed on the term "state-affiliated" after consideration of other formulations. It defines state-affiliation based on the exercise of state control over editorial content—thus excluding editorially-independent publicly-financed media—based on a range of factors including financial resources, direct or indirect political pressures, and control over production and distribution. State-affiliated is a more ambiguous, but potentially less controversial label than state-controlled or even state-funded, because the nature of the affiliation is not specified. Like its counterparts, the company consulted with outside experts including myself and

²⁵ Shirazyan 2020.

²⁶ Based on my observations and experience as a journalist on three continents. Also see for example: Logan Molyneux & Rachel R. Mourão (2017): Political Journalist Normalization of Twitter. *Journalism Studies*, DOI: 10.1080/1461670X.2017.1370978; Neilson, Tai. 2018. "'I Don't Engage': Online Communication and Social Media Use among New Zealand Journalists." *Journalism* 19 (4): 536–552.

²⁷ Twitter banned all political advertising in October 2019. Accessed Nov. 1, 2019 <https://twitter.com/jack/status/1189634360472829952?lang=en>

other members of the Human and Digital Rights advisory group in its Trust and Safety Council.

Twitter focused initially on state-affiliated media and government accounts from the five countries that hold permanent positions on the U.N. Security Council: China, France, Russia, the United Kingdom, and the United States. The new labels apply to institutional accounts, as well as personal accounts of editors-in-chief and other prominent staff who work for state-affiliated media. The labels are not included on public service media outlets. Government spokespeople with an “outsized influence” on the geopolitical conversation, like ambassadors and foreign ministers, are also labeled.

“We’re going to focus initially on those accounts that are focused on the geopolitical global conversation, where the likelihood that someone sees the account out of their home country is higher,” said Nick Pickles, Twitter’s public policy director.²⁸

These accounts and their content will no longer be amplified through the platform’s recommendation systems, including the home timeline, notifications, and search, which could result in a limit on the visibility of, and engagement with, that content.²⁹ The company was the first platform to ban state media advertising and is the only major platform with a global prohibition on political advertising, according to Pickles.³⁰ It blocked state-backed media from advertising on the platform in mid-2019.³¹

Implications

Deciding which news counts as independent journalism, and which media outlets are extensions of their political or financial backers, is not only difficult but is ultimately political. Media outlets that were concerned they would get a label sought to persuade the platforms that they were editorially independent. Facebook appears to have delayed implementation of its policy in part due to lobbying from such outlets, as well as concerns raised by external experts it consulted. And Twitter, as the last platform to implement state media labeling, was able to learn from the debate and controversy surrounding the terminology and approach adopted by its competitors.

²⁸ Correspondence with Nick Pickles, Twitter, June 2020.

²⁹ Accessed Aug. 6, 2020 https://blog.twitter.com/en_us/topics/product/2020/new-labels-for-government-and-state-affiliated-media-accounts.html

³⁰ Correspondence with Nick Pickles.

³¹ Accessed Aug. 6, 2020 https://blog.twitter.com/en_us/topics/company/2019/advertising_policies_on_state_media.html and <https://twitter.com/jack/status/1189634360472829952?lang=en>

“The policy recognizes that state media have an agenda setting power, an opinion making power, that is coupled with the strategic power of the state. But is also recognizes that state media are not always bad, so we don’t want to remove them from the platform,” said Shirazyan, who helped develop Facebook’s new policy, meaning that the company had to do extensive research and consultations in the lead up to the new policy launch.³²

Determining media ownership and financial control requires specialized expertise and nuance, and there are academic fields devoted to analyzing these very topics. The platforms recognized this and conferred with experts, but they did not publish full lists of those consulted. Concerns about the lack of transparency are widespread, as is recognition about the expertise needed to make determinations about the level of state interference and editorial independence in a given media outlet.

Furthermore, the label application is inconsistent, as separate investigations of YouTube’s labels by [CPJ](#) and [ProPublica](#) found. In a 2018 review I conducted of 37 state-funded public media outlets on YouTube.com, 19 included notices, and the rest did not. For instance, the [Hungarian public broadcaster’s channel](#) carried no label whereas TRT, the Turkish public broadcaster, did. The Venezuela-based, pan-Latin American channel Telesur, which is also backed by Cuba, Ecuador, Nicaragua, Uruguay, and Bolivia,³³ is labeled as “funded in whole or in part by several Latin American governments.”

My own experience working as a journalist for a Saudi-owned news outlet and conducting media assessments in Uganda, Mozambique, and Egypt underscored the challenges of determining ownership and the subtlety of editorial influence by the state.

Sally-Ann Wilson, the CEO of the 75-year old Public Media Alliance, which represents 100 public media outlets around the world, expressed concern about the social media platforms deciding these labels unilaterally and the skills needed to make such determinations, which are not static.³⁴

“You can have a country which its national media organization may be public media one day, then you get a new government come in and it changes overnight. And I’m not sure that a lot of the social media platforms have that nuancing, have that experience,” she said.

³² I participated in these consultations on behalf of the Committee to Protect Journalists.

³³ <https://cpj.org/reports/2012/08/state-media-focus-on-opposition-critics-and-stifle.php>

³⁴ Interview with Sally-Ann Wilson, CEO Public Media Alliance. Aug. 8, 2020.

Al Jazeera provided hundreds of pages of documents to Facebook to detail what it said was its editorial independence from the government, according to Andrew Koneschusky, a partner at DC-based law firm CLS Strategies, who helped Al Jazeera navigate discussions with Facebook.³⁵ Not all affected media will be able to hire law firms and lobbyists to pursue their interests, however.

But Does Labeling Work?

There is scant evidence that the categorization approach adopted by the platforms will improve media and information literacy or reduce the spread of disinformation and propaganda, although it would not be difficult to test with the right data. But the companies said they do not keep data on this and have not conducted any studies to address the efficacy of labeling. Remedying this shortfall would be an important aspect to improving governance and accountability.

Representatives of RT, VOA, and Al Jazeera, which had been operating under the “state-funded” label on YouTube for more than a year by the time the other platforms introduced labels, said in interviews in June and July 2020 that they had not noticed any change in audience engagement with their videos as a result. RT said that its audience had continued to grow as it became the first TV news outlet to achieve 10 billion views.³⁶

The platforms did not provide any information about whether the labels were having the intended impact of educating audiences and did not indicate that they had the data to make such an assessment. The lack of data to effectively research and analyze the impact of platform policies is a recurring theme in platform governance and makes it difficult to identify the impact and potential unintended consequences of platform policies. Some studies show that labeling can improve media and information literacy, but they are often limited to analysis of Twitter data because it has an open API that makes such data analysis feasible. An experimental Gallup/Knight Foundation [study found](#) that labels indicating credibility improved user ability to identify false or misleading content, and reduced engagement with, and sharing of, false news.

³⁵ These included: Law converting Al Jazeera to a Private Corporation for Public Benefit (PFPB): <https://www.almeezan.qa/LawView.aspx?opt&LawID=2471&language=en>; Law establishing PFPBs: <https://www.almeezan.qa/LawArticles.aspx?LawTreeSectionID=10087&lawId=2697&language=en>; Code of Conduct: <https://network.aljazeera.net/about-us/our-values/values>; Editorial Standards: <https://network.aljazeera.net/about-us/our-values/standards>; Code of Ethics: <https://network.aljazeera.net/about-us/our-values/code-ethics>; among others.

³⁶ Interview with Anna Belkina, Deputy Editor in Chief, Head of Communications, Marketing and Strategic Development, RT, June 17, 2020.

While disclosing additional information about state-affiliated media outlets is a step toward increasing transparency and reducing manipulation, experts suggest the need for a more nuanced system that would get beyond funding and state influence on editorial control.

Concerns about who decides which news is credible has also led to efforts by those in the journalism field to develop an alternative approach based on professional criteria related to transparency and trustworthiness.

For example, Newsguard is a service that rates news outlets according to nine criteria to deliver a rating of green, for consistently adhering to basic credibility and transparency standards; or red, for failing to do so. According to the methodology posted on its website, Newsguard's staff of journalists and editors also differentiates satirical outlets and those consisting of primarily user-generated content, and they receive a different label that visibly distinguishes them from news sites.³⁷

According to the company's website, it rates more than 5,800 sites in the U.S.A., U.K., France, Germany, and Italy, using a "nutritional label" that provides information to the user through a plugin. The company claims these outlets account for approximately 95% of all the news and information consumed and shared online in those countries, although it does not provide information about how it arrived at this figure.³⁸

Conclusion

Tech platforms, policymakers, and journalists alike realize that information operations and state propaganda rely on a mix of state-sponsored journalism, social media amplification, and algorithmic manipulation. The way that platforms govern which news outlets and journalists get labeled may be aimed at reducing the influence of certain outlets and their ability to amplify their content, but these labels will undoubtedly have unintended consequences for public and private media.

Platforms must commit to collecting the data required to understand the impact of these policies on journalism and media organizations, and to sharing it with independent researchers and experts in the media development field. This should include information on which accounts are labeled, the effects of labeling on traffic and revenue, and a transparent, publicly accessible appeals process. Platforms could also use these policies to make their own push for greater transparency by media outlets, allowing only public documentation to support claims of independence.

³⁷ <https://www.newsguardtech.com/ratings/rating-process-criteria/>

³⁸ Accessed Aug. 30, 2020 <https://www.newsguardtech.com/about/newsguard-faq/#>

Regardless of who is doing it, labeling is fraught and platform approaches have caused indignation among outlets that received the designations because of a perceived lack of transparency into how such decisions are made, and the perception that they are inherently negative, according to interviews with several representatives of those outlets and a review of their public statements.

The question of whether labels should be rolled out more expansively to include all news media, since state control can be exerted through media capture and privately-owned media may be influenced by their owners and funders as well, has broad ramifications for the journalism field. However, too little is known about the impact of labels—on perceptions, on visibility, on revenues—to make informed decisions about whether these approaches are efficacious and should be rolled out more broadly. Meaningful self-regulation will also require a more consistent approach. An approach focused on more nuanced categorization could be more helpful, but ultimately comes down to the same concerns about how platforms govern the media outlets that depend on them.

Tech Platform Approaches to State Media Labeling

Platform	Label Used	Definition	Label Visibility	Additional Restrictions
Twitter	State-affiliated	Entities where the state exercises control over editorial content by publishers through financial resources, direct or indirect political pressures, and/or control over production and distribution.	Appears in profile Appears on tweets	No advertising from state media Label ads Blocks paid advertising targeting US users No amplification through recommendations system
Facebook	State-controlled	Media outlets that are wholly or partially under the editorial control of their government	Appears globally in the Ad Library Page view, on Pages, and in the Page Transparency section. In the US, the label also appears on posts in News Feed	Restricted advertising Blocks paid advertising targeting US users blocked
YouTube	State-funded or publicly-funded	A channel owned by a news publisher, that is funded by a government, or publicly funded	Information panel providing publisher context displayed on the watch page of the videos on its channel. Not included in the About section for the outlet, which is written by the user.	

It's the Business Model: How Big Tech's Profit Machine is Distorting the Public Sphere and Threatening Democracy

**Nathalie Maréchal, Ellery Roberts Biddle,
Jessica Dheere, Rebecca MacKinnon**

The following essay is drawn from "[It's the Business Model](#)," a two-part series of reports by Ranking Digital Rights (RDR), released in March and May 2020.

While the major social media platforms have been drivers of powerful protest movements, enabling ordinary people to organize and speak truth to power around the world, they have also amplified disinformation, hate speech, and other dangerous content online. Companies have made big promises to improve on these problems, but time and again, they have failed.

In this series, we take a critical look at the social and human rights implications of what drives profits at Facebook, Twitter, and Google. All three tech giants have built their business models on targeted advertising and algorithmic systems that can determine the reach of a message by targeting users who are most likely to share it, and thus influence the viewpoints of thousands or even millions of people. In an election cycle, or amid a pandemic, these dynamics can lead to the proliferation of disinformation at a massive scale, with dire consequences for democracy or public health.

We argue that companies' failures to staunch the flow of problematic content and disinformation online is rooted in their dependence on these systems and the surveillance-based business models that they serve. And we recommend policy measures that will protect free expression while holding digital platforms much more accountable for the effects of their business models on public discourse.

Democracy's Online Speech Challenge

Our first report lays out the problems at hand and shows how simply reining in problematic content will not lead to better outcomes for the digital public sphere, or for democracy. We warn against using algorithmic systems or artificial intelligence to filter problematic content, and urge policymakers to preserve Section 230 of the Communications Decency Act, a provision of U.S. law that protects social media companies and other digital platforms from legal liability for content posted or created by their users.

We argue that companies instead must be held accountable for how content is amplified and targeted. Corporate "content-shaping" algorithms are built not only to show users content likely to pique their interest, but also to generate profits for the companies by keeping users engaged. They show users viral content, serve them ads, and collect more data about them along the way. This data helps companies target (or, in their words, "personalize") content and ads at users, in an endless iterative process.

Targeted advertising systems rely on these and other invasive data collection practices and algorithmic systems to create detailed digital profiles of users. This enables anyone who can buy ads on the platform to target specific groups of people with manipulative or misleading messages and can result in unfair (and sometimes illegal) discrimination. RDR data shows that companies are unacceptably opaque about how these systems work, as well as about how political actors are using these systems, making it impossible to have an informed discussion about solutions, and how best to regulate the industry.

As things currently stand, companies are free to collect virtually any information they want to, and to use it however it benefits their bottom line. Facebook, Google, and Twitter Hoover up massive amounts of data about internet users (both on their platforms and off). Indeed, not only do platforms track what users do while using their services, they also follow them around the internet and purchase data about their offline behavior from credit card companies and data brokers.

The data that is collected becomes the core ingredient for developing very powerful digital profiles about users that can then be used by advertisers and political operatives to target groups and individuals. What's worse, the tech giants do not clearly disclose exactly what they are doing with users' data. In such conditions, the notion of user consent is meaningless.

Reliance on revenue from targeted advertising incentivizes companies to design platforms that are addictive, that manufacture virality, and that maximize the information that the company can collect about its users. Policymakers and the American public are starting to understand this but have not taken this insight to its logical conclusion: the business model needs to be regulated.

Our policy recommendations for companies urge them to undertake corporate due diligence on the impact of these systems; set and enforce rules to prevent malicious manipulation of these systems; and institute transparency practices that will allow users to understand who is influencing what content they see online and why they are the ones seeing it.

Getting to the Source of Infodemics

We will never be able to eliminate all violent extremism or disinformation online any more than we can eliminate all crime or national security threats in a city or country—at least not without sacrificing core American values like free speech, due process, and the rule of law. But we can drastically reduce the power of such content—its capacity to throw an election or bring about other kinds of real-life harm—if we focus on regulating companies' underlying data-driven (and money-making) technological systems, and on good corporate governance.

Our second report argues that policymakers should adopt a human rights framework for platform accountability, building on five years of research for the Ranking Digital Rights Corporate Accountability Index, which evaluates how transparent companies are about their policies and practices that affect online freedom of expression and privacy.

International human rights standards provide a framework for holding social media platforms accountable that can complement existing U.S. law. They also can help lawmakers determine how best to regulate these companies without curtailing users' rights to privacy and free speech.

We propose concrete areas where the U.S. Congress should act to mitigate the harms of disinformation and other dangerous speech: transparency and accountability for all types of online advertising, akin to requirements that currently apply to print and broadcast political ads; a federal privacy law that protects people from the harmful impact of targeted advertising; and corporate governance reform that would require companies to disclose information pertaining to the social and human rights impact of targeted advertising and algorithmic systems.

Congress should pass the Honest Ads Act, a bill that would require those who purchase and publish online political advertising to disclose information about the ads to the public, and expand its scope to include all types of online ads, thus mandating a universal, publicly accessible database of advertisements. Moreover, Congress should pass a strong data privacy law. If effectively enforced, this law can protect internet users from the discrimination inherent to automated content optimization and limit the viral spread of harmful messages. The way to achieve that is by strictly limiting data collection and retention to the absolute minimum that is required to deliver the service to the end-user, irrespective of the company's business model or financial interests.

To rein in the tech giants' power and hold them accountable to the public interest, lawmakers and policy advocates also must prioritize corporate governance and shareholder accountability.

Good corporate governance is a prerequisite for good content governance by social media platforms. In order to identify, prevent, and mitigate social harms caused by the amplification and targeting of dangerous content, Facebook, Google, and Twitter should be subject to strong institutional oversight. Shareholders, a growing number of whom are concerned with companies' social impact and governance, need to be empowered to hold companies responsible for addressing their social and human rights impacts.

Shareholder empowerment can in turn strengthen the connection between shareholders and the ecosystem of non-governmental actors—NGOs, unions, consumer advocates, academic researchers, and journalists among others—whose expertise and perspective are essential for companies to be able to fully understand and address their social impact.

Businesses Must 'Create Value for All Stakeholders'

In August 2019, the Business Roundtable [published a statement](#) signed by 181 CEOs of major U.S. corporations, announcing their commitment to the idea that the purpose of business is no longer only to serve shareholders, but also to "create value for all our stakeholders" including employees, customers, and communities. It is no longer debatable whether businesses in any sector should be held accountable for their social impact.

The proliferation of misinformation during the COVID-19 pandemic has shown just how high the human cost—and ultimately the economic cost—can be when companies prioritize shareholder returns over all else, and when the government

fails to hold companies accountable to the public interest. Society is now paying the price for failing to require that companies make credible efforts to understand and track their social impact, and to take responsibility for preventing and mitigating social harms that their business may cause or contribute to. It is time to adjust course and design a resilient and equitable information environment—through increased transparency; responsive, evidence-based regulation; and persistent stakeholder engagement—that protects human rights and civil liberties especially in times of crisis and change.

Sustaining Journalism During COVID-19: How the EU Can Turn Digital Platform Regulation into a Tool for Democracy

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An Extinction Event

Trustworthy, professional, and independent journalism is not only one of the foundations of pluralistic, thriving societies—it is suddenly being rediscovered as indispensable, even lifesaving, during a global pandemic. However, COVID-19 has further undermined the media sector’s sustainability at a time when it is most sorely needed. This has been labelled as an ‘extinction event’, particularly for local news, and the risks it represents are becoming visible not only to the general public; it is also an issue and a priority for policymakers—although a structural response is not yet fully forthcoming.

The newly published report “**A Lockdown for Independent Media?**”¹ examines this dilemma through the regional lens of South-Eastern Europe. Its thorough country-by-country diagnosis reveals similar patterns and leads to a rather blunt, though not surprising, finding. By and large, it seems rather unlikely that the downward spiral towards combined autocratic tendencies and so-called ‘media capture’ by oligarchs and state actors can be remedied on national levels alone. Given these pre-existing conditions, the pandemic struck severely at the region’s press landscape, resulting in devastation amongst journalistic communities and the media sector. This necessitates even more targeted intervention.

¹ <http://library.fes.de/pdf-files/bueros/budapest/16392.pdf>

- European COVID-19 aid packages currently under negotiation were supposed to include certain conditions for the recipient, such as on **safeguards for the rule of law**. The same logic should—and must—now be applied to EU member states, candidate countries, and states in the eastern and southern neighborhood, focusing on the sustainability of independent journalism, media pluralism and the freedom of speech, information, and the press at large;
- In addition, the EU and individual member states' governments have already significantly supported **media development** in South-Eastern Europe since the regime changes of the 1990s until this very day. For the media, these are means of life support, equivalent to the provision of ventilators and oxygen units. This support must continue. However, the aforementioned report has also laid bare a frustrating truth: It has seldom resulted in a lasting remedy for the media's hardships;
- Continued short-term emergency aid and ongoing, longer-term political bargaining in Brussels must be complemented by a third, more systemic approach. This article argues that, by correcting market failures through the **regulation of digital platforms**, the European Commission and EU member states have another, very powerful instrument at hand to achieve this very goal. They can thereby sustain healthy media landscapes within the union, its neighbors, and even at a global level.

A Window of Opportunity

In the wake of the COVID-19 shock and its turbulent consequences, a window of opportunity has coincidentally opened up by means of the Digital Services Act (DSA), a piece of landmark regulation accompanied by the European Democracy and Media Action Plans, announced by the European Commission earlier this year.

Technically seen as a revision of the e-commerce Directive, the DSA is supposed to focus on trade, markets, and related regulatory approaches in order to finally reign in the so-called digital intermediaries, such as the mostly US- and increasingly China-based big-tech companies that dominate the markets of search engines, online shopping and those of social media platforms.

Traditionally, the European Union was always about “the economy, stupid”. Its founding mothers and fathers sought reconciliation but built it very practically on coal and steel. The EU's signature project in response to Germany's reunification and regime changes further east and south was a common currency: the Eurozone.

Furthermore, the complicated relationship with the United Kingdom (“*I want my money back*”) and Brexit is about payments, subsidies, and trade.

Therefore, it shouldn’t come as a surprise that cultural and media policy was not only disregarded and treated as a niche topic in Brussels but worse, as a non-topic. Technically, according to the Amsterdam Protocol, this competency is reserved for member states. To this very day, the Commission has no formal remit in the matter. For example, EU Commissioner Margrethe Vestager didn’t see “#fakenews as an antitrust issue” until not so long ago. Digital policies, though inescapably intertwined with remits on media and civil liberties, are still mainly considered a matter of infrastructure or trade, if they are considered at all. Therefore, the DSA’s stark focus on economic dimensions might not come as a surprise, while the accompanying Democracy Action Plan would mostly contain non-binding recommendations and a few “carrots” in terms of funding instruments.

Lacking a clear mandate, the commission cannot be blamed for a hotchpotch of narrow or non-existing competencies. As the core, founding member states of the union did not want to relinquish their national monopolies on media regulation some thirty-odd years ago, the EU’s leverage with governments in Ankara, Belgrade, or Budapest naturally remains limited in this domain.

However, the DSA might become a game changer in this regard.

Talking journalism, press freedom, and media policy today means regulating tech. And just like climate change, migration, or COVID-19, this works only, literally, across borders. Artificial intelligence or Facebook cannot be reined in from Berlin or Bratislava. As this notion slowly gains currency among the ranks of policymakers, a critical mass in favor of a holistic and transnational approach might finally emerge just in time for the inception of the Digital Services Act. This realization, after all, has accelerated during the pandemic.

As the report “A Lockdown for independent Media?” illustrates in great, worrying detail, the growing pressures on media outlets and individual journalists today are mostly economic, resulting in self-censorship, closures, and eventually a reduction in pluralism and diversity. The disintegration of traditional business models and the further drop of advertising revenue during the COVID-19 crisis amount to a perfect storm, making it even easier for autocrats to control and constrain the information space.

Transnational platform regulation can offer some remedies, by providing a mechanism to directly remonetize authoritative sources of information and thus strengthen their sustainability, but also by safeguarding media pluralism at the technical, global distribution level and thus, ironically, circumventing

the reach of local actors to intervene. Such a framework could even indirectly enforce the same rule of law principles that the EU's COVID-19 aid package might eventually lack.

Reversing the Logic

In most countries, digital advertising is dominated by the duopoly of Google and Facebook, which command north of a 60 percent market share, depriving legacy media of its traditional revenue streams. A fair and transparent regime of redistributing profits back, at least partly, to the content creators has not yet materialized. Even worse, the relevant metrics are still mostly defined by “engagement” fueled by sensationalism and clickbait, thus incentivizing, rewarding and amplifying the exact opposite of rigorous and ethical journalism. Typically, a market failure of such a large scale would prompt calls for regulatory intervention to correct it. **Affirmative action is needed to support the promotion of trustworthy news and information, providing due prominence for public interest journalism online.** However, two questions need to be addressed first: how is this to be defined, and how can such support for it be stipulated by law?

As soon as these two questions are combined, a challenge prevents itself. Apart from autocrats, nobody seriously supports defining what is and is not journalism by law. Fortunately, co-regulatory approaches offer a two-tier model as a way out, as do a number of best practices in other industries to look at and to learn from. According to these, the actual obligations for different stakeholders are defined by law—this constitutes the regulatory part. However, the actual definitions and specifications are sourced, governed, and enforced by means of self-regulatory industry standards and bodies.

In the media sector, we are witnessing an abundance of ethical codes alongside a lack of incentive in realizing them. In other words, compliance with existing professional journalistic norms is a fine idea, but one which lacks enforcement and doesn't pay off in terms of digital reach and revenue. A co-regulatory framework is needed to reverse this logic—exactly like car manufacturers are strongly incentivized to build safe cars, even though no law in the world tells them exactly what a safe car is to look like. This is how co-regulation delivers.

Translating this to the media sector would require four crucial elements:

- First of all, the journalistic community must come up with a **unified benchmark** to subscribe to voluntarily;

- Secondly, self-assessment according to these criteria must be open to **third-party audits** in order to add a—thus far mostly missing—level of compliance and external accountability (something which would also require a deep look into the mirror for us journalists);
- Thirdly, this then must result in **machine-readable signals** to inform both human and algorithmic decision making in news distribution and consumption;
- Last not least, intermediaries and platforms must be obliged by law to take on these signals, based on a due and transparent process, and **provide preferential** treatment of compliant sources respectively.

The Journalism Trust Initiative (JTI), initiated by Reporters Without Borders (RSF) together with partners such as the European Broadcasting Union (EBU) and Agence France Presse (AFP) follows this very logic. It has already developed and published an auditable and machine-readable set of criteria under the aegis of CEN, the European Committee for Standardisation (*disclosure: the author works for Reporters Without Borders on the JTI*).

One or more of such transparently sourced and governed, non-proprietary instruments could form the self-regulatory core for a co-regulatory mechanism to come.

As concerns legislation, examples of such affirmative action already exist, such as a quota for European works in the Audiovisual Media Services Directive or ‘must-carry’ rules for broadcasting and electronic programming guides. These legal instruments remind us of times when the spectrum of distribution used to be scarce, defining the logic of media regulation accordingly. However, today’s digital technologies mean that scarcity has flipped from the supply to the demand side of the equation—that is to say, it now refers to the limited attention span and time of consumers and citizens, rather than the range of available channels. Co-regulatory solutions must respond properly to this shift of paradigm.

The upcoming Digital Services Act of the European Commission now provides a unique opportunity to enshrine this logic, even more so as it is expected to build on the EU’s traditional core competencies in trade and competition. It should not only focus on weeding out malicious actors, but equally strive to support the good by providing a tangible economic benefit for public interest journalism.

A resulting ‘must-find’ rule for search engines and social media platforms would result in elevated reach and revenue, enabling eligible content providers to capitalize directly on investments in professional journalism and ethical conduct. It could simultaneously limit the powers of local actors to exert political interest on

media via corrupt advertising markets and attempts to deprive independent journalism from the profits it deserves. Last not least, self-regulatory compliance mechanisms may become a major contribution to capacity building. Media outlets, big and small, could use these self-assessment mechanisms to optimize their internal processes and performance, train staff and educate the general public about journalistic ethics in a structured way, hence elevating levels of media and information literacy.

Advertising as the Elephant in the Room

In times when the media's traditional advertising-based business has already declared dead, the year 2020 might also have some surprises on offer when it comes to new leverage for advertisers vis-à-vis Facebook. It remains to be seen whether their boycott of the platform is driven purely by corporations' social responsibility or are mere PR stunts to disguise already planned budget cuts—or maybe a mix of both.

However, so far it appears that episode has a few, perhaps promising, lessons to teach:

- Although the pandemic has led to a renewed appreciation of the value of professional journalism, the field is economically starved. Nevertheless, there is still a lot of money in the system. Maybe advertising as a business model for media is not as dead as it seems;
- Tens of billions of Euros are **wasted** every year due to ad fraud and unintentional targeting—which means that spending ends up where advertisers don't want to see it, filling the coffers of the wrong people and thereby fueling and **monetizing hate**, polarization and division, going on to damaging the reputation of the advertisers' brands in the first place;
- While the products which feature in advertisements and the factories which produce them are subject to numerous of laws and rules, to keep them from poisoning our rivers and our children, their advertising expenditures continue to fuel the poisoning of our information space—unintentionally or not—and are subject to exactly **zero regulation**. This needs to change;
- We should also not forget that the space for advertising is shrinking—not just in terms of advertising offers, but in terms of the recipients' attention. This is where the bottleneck is located in the value chain these days. Eyeballs and viewing time are physically limited, geared more and more towards Netflix and other paywalled, ad-free offers—even more so in lockdown during the pandemic. This development elevates the marketers' demand even more for environments that are accessible and also safe for their brands in the reputational sense.

Advertisers will not save journalism and they should not have to. But creating both legal incentives and technological means to align their spending to comply with professional journalistic norms could make a difference for both—and for societies at large. However, fixing these now all to obvious design flaws and market failures of programmatic advertising necessitates for legislative action as well.

Politically speaking, this is all about will, interests of key players and the specific instruments at hand. The experiences of the recent European Council summit suggest that it may be easier for the EU to reign in oligarchy in Silicon Valley than to **prevent autocratic-oligarchic alliances on its doorstep, even among its own member states**. Targeted platform and ad-tech regulation, including due prominence rules based on co-regulatory mechanisms, could become a game changer globally, also significantly improving the healthiness of societies and their information ecosystems in member states and the wider European neighborhood. Already existing or planned support schemes should of course complement such a framework, particularly focusing on legal support, cross-border collaboration and transparency of media ownership.

In terms of a critical mass, **another promising development is the Alliance for Multilateralism**. Spearheaded by Germany and France, it allows additional middle powers such as Australia, Canada, and Mexico to share not only their grievances, but an existential desire to define common ground, caught somewhere between the two increasingly undesirable extremes of the United States and China. Not surprisingly, the fight against disinformation—and for press freedom, the safety of journalists, and a pluralistic information space—is high up on the agenda of this Alliance. While the COVID-19 pandemic brings out the worst and the best in us ordinary citizens, it definitely brings out the worst when it comes to autocrats and their power. Hopefully it can also bring out the best of these coalitions of the willing, namely the European Union during the German presidency of the council. This will be a defining moment to make—or to break.

The Alliance for Multilateralism

The “Alliance for Multilateralism” launched by the French and German Foreign Ministers is an informal network of countries united in their conviction that a rules-based multilateral order is the only reliable guarantee for international stability and peace and that our common challenges can only be solved through cooperation. It aims to renew the global commitment to stabilize the rules-based international order, uphold its principles and adapt it, where necessary.

The Alliance revolves around concrete initiatives to reach its objectives and facilitates results-based partnerships of which one is the International Partnership for Information and Democracy. Its declaration sets forth goals and principles for guaranteeing free, pluralistic, quality reporting despite the changes resulting from new digital communication forms. For example, it opposes the manipulative use of fake news to undermine democracy. Among other things, the signatory states undertake to defend freedom of opinion and freedom of the press, as well as to protect journalists.

Source: *Alliance for Multilateralism*—multilateralism.org

The Digital Services Act (DSA)

As part of the European Digital Strategy, the European Commission has announced a Digital Services Act package to modernise the current legal framework for digital services, which has been unchanged since the adoption of the e-Commerce Directive in the year 2000.

The Commission would propose clear rules framing the responsibilities of digital services to address the risks faced by their users and to protect their rights. The legal obligations would ensure a modern system of cooperation for the supervision of platforms and guarantee effective enforcement.

The DSA would also propose ex ante rules covering large online platforms acting as gatekeepers, which now set the rules of the game for their users and their competitors. The initiative should ensure that those platforms behave fairly and can be challenged by new entrants and existing competitors, so that consumers have the widest choice and the Single Market remains competitive and open to innovations.

Source: *European Commission*

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Threats to Media Sustainability and Freedom of Expression in the Digital Era

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Journalists and the news media industry as a whole face unprecedented threats in the changing information environment—economic and market challenges, increasing distrust and denigration of their work, and new forms of digital repression—that are often overlooked in today’s regulatory conversations. Especially now, with the perfect storm of disinformation, market destabilization, digital repression of critical voices, and the disruption of our daily lives caused by the COVID-19 crisis, the situation facing journalism and news media is dire.

The need to address these challenges are what led us at the Global Forum for Media Development ([GFMD](#)), an international network of journalism support and media development organizations, to work with our members and partners to establish the Dynamic Coalition on the Sustainability of Journalism and News Media ([DC-Sustainability](#)). The DC-Sustainability is an open, multi-stakeholder initiative operating within the Internet Governance Forum (IGF) that seeks to promote a core concern shared across the IGF ecosystem: protecting our online information ecosystems by promoting human rights, press freedom, and access to information.

While the internet has opened up a world of possibilities for citizens’ empowerment and information exchange—allowing independent content producers the ability to reach a global audience of millions, if not billions—it has also created myriad threats to information ecosystems and freedom of expression. In the area of press freedom in particular, the global trends are disturbingly negative. In the 2019 [Press Freedom Index](#), Reporters Without Borders (RSF) shows “growing animosity towards journalists” by governments in all regions of the world, contributing to fear, silencing, and violence. “The number of countries regarded as safe, where journalists can work in complete security, continues to decline, while authoritarian regimes continue to tighten their grip on the media,” RSF added. Freedom House offered a

similarly gloomy assessment in its 2019 [Freedom of the Media](#) analysis, stressing that media freedom has deteriorated around the world over the past decade, with new forms of repression taking hold in open societies and authoritarian states alike.

For examples of how this manifests, look no further than the digital sphere. The internet is essential to contemporary journalism and dissenting voices, especially investigative and cross-border journalism networks that rely on information sharing across continents to expose corruption and wrongdoing, as well as communicate invaluable information to the public in times of crisis, such as with the current pandemic. Yet repressive actions, such as government use of digital tools to monitor journalists and their sources, undermine journalism as well as divert resources that could be used for new storytelling to ensure the privacy, safety, and security of journalists and media workers. Instead, such actions generate chilling effects via legal and regulatory manipulation, abusing antiterror or similar legislation to quell dissent and censor political speech, or suppressing vital information relevant to public health. State-sponsored or encouraged harassment has also become the bane of many news outlets' existence, especially small and local ones. Add to this multiple new and evolving challenges, from data breaches to the proliferation of third-party surveillance technologies.

In addition, media independence is waning. [Media capture](#)—where governments and centers of power use media systems for their own interest—is on the rise, for instance. An issue that is compounded as the [market landscape](#) for financially sustaining and monetizing independent and trustworthy news media is faltering. With falling revenues and fewer journalists, we are seeing the emergence of “[news deserts](#),” entire communities and regions bereft of any meaningful coverage, which range from [the rural United States](#) to communities across [Colombia](#) and Latin America. These trends have severely affected the role of journalists and are leading to unforeseen consequences for the future of both developed and emerging democracies. Not only does the lack of professional journalism impact our ability to access high-quality information, but it inherently erodes the very foundations of democratic societies. See, for example, the vicious cycle of undermining credible journalism that is not optimized for social media platform algorithms, or which is simply [drowned out](#) by bots, trolls, and malicious actors who exploit such algorithms to spread disinformation and disrupt information ecosystems, thereby necessitating more resources than be devoted to combating such phenomena. What is also not so obvious in an age where authoritarian attacks on press freedom have insidiously filtered into mainstream discourse, is that critical information in times of crises or humanitarian disasters—as well as problematic political developments like internet shutdowns and election interference—is paramount.

The lack of public interest journalism and trust in media damages society at-large by enabling the proliferation of misinformation and disinformation and endangering access to critical, high-quality information. Therefore, there is a pressing need for multi-stakeholder actions that address the [core problems](#) and not just the symptoms of decline, such as what the DC-Sustainability aims to accomplish.

The previously described challenges are only exacerbated by one of the—if not the—most critical challenge currently facing the journalism and news media sector: financial sustainability and economic viability. It is important to recognize that lesser alternatives to independent and sustainable local and investigative journalism intrinsically risk press freedom, access to information, and freedom of expression since not all information is created equally. While someone can create an informative, 10-minute-long YouTube video in a few hours that receives a million views, an investigative report running for the same duration needs time, resources, and much more to produce a serious piece of journalism. If journalism and news media organizations cannot meet their basic financial needs or must increasingly redirect precious resources to safeguard themselves from troll farms, botnets, platform algorithms, and content demonetization, it is an even greater lift to address the countless other concerns journalists face—from personal safety to the muzzling of press freedom.

The media industry is one of many economic sectors that are [disrupted](#) by the internet economy. Global debates taking place within legislatures, regulatory agencies, and policy circles are considering the wider impact that the digital economy, government regulation, and digital platform policy have on society. Yet these debates often overlook or minimize journalism and news media and the [implications](#) of digital platforms' market power on access to high-quality news content. Thus, any serious effort to address the mounting problems plaguing digital platforms—from misinformation and hate speech, to content takedowns and violent and extremist content—must also [prioritize](#) their impact on and the challenges faced by journalism and the news media sector. In other words, content-related issues must also be seen within the wider context of market-related challenges, while clearly distinguishing content regulation from market regulation.

With the ongoing COVID-19 crisis and the ensuing economic fallout, journalism and news media have never been [more vulnerable](#). For the sector to thrive, it is essential to strengthen democratic governance and safeguard an environment that is conducive to producing high-quality, fact-based information. To foster independent and pluralistic media ecosystems that counter disinformation, local and independent journalism and news media sustainability must be a priority. This means that we have to fight for our information ecosystems and

for public-interest media. Our advocacy via the DC-Sustainability, collaborative initiatives such as the [joint emergency appeal](#) for journalism and media support, and GFMD's larger network and programs allows us to amplify journalism and news media voices within digital policy spaces while shaping policy agendas to prioritize the current threats.

As the 2020 IGF approaches, we mark the one-year anniversary of the launch of the DC-Sustainability by continuing to advocate for the preservation of everyone's right to access information, protect the individuals on the front lines who work tirelessly to help keep the public informed, and celebrate one of the bedrocks of our democracies: free, independent, and pluralistic media.