

**Contribution to the public consultation on the
OECD Draft Recommendation of the Council on Information Integrity**

We, the undersigned civil society organizations members of the Forum on Information and Democracy's civil society coalition and members of the Global Forum for Media Development, welcome the OECD's initiative to develop and adopt a Recommendation on Information Integrity. Such a recommendation sets an important international standard to safeguard information integrity and hold online platforms to account. It will be the first soft law of its kind and, therefore, needs to set the highest standards for democratic rules in the global information space while ensuring that international human rights obligations are respected.

We encourage the OECD to take into account the following suggestions to ensure that this Recommendation sets the highest standards for information integrity:

- RECOGNISING the importance of alignment with global agreements and declarations: Article 19 of the Universal Declaration of Human Rights; The 1991 Windhoek Declaration and the 2021 Windhoek+30 Declaration; Information as a Public Good; Target 16.10 of the Sustainable Development Goals (SDGs); The UN Global Principles for Information Integrity; The Global Digital Compact; and The Global Declaration on Information Integrity Online (launched by Canada and the Netherlands) and also OECD DAC Principles for Effective Media Support and Information Environment (p.1).
- RECOGNISING that access to information, **universal and meaningful** connectivity are key enablers of information integrity and that the digital gap still affects a large part of the population (p.1).
- RECOGNISING that States bear a **primary obligation to safeguard freedom of expression, information and opinion** and recognize the indispensable role played by human rights defenders, journalists, and whistleblowers in upholding these fundamental rights (p.1).¹
- RECOGNISING that in **combating disinformation and violence, it is imperative to avoid resorting to criminalization** and that any strategies to counter disinformation must adhere to international human rights laws, ensuring they are lawful, justified, and proportionate (p.1).

On the proposal of the Public Governance Committee

¹ Address the risks to sustaining peace posed by disinformation, misinformation, hate speech and content inciting harm, including content disseminated through digital platforms, while **respecting the right to freedom of expression** and to privacy and ensuring unhindered access to the Internet **in accordance with international law**, domestic legislation and national policies. UN (2024), [The Pact for the Future: Resolution](#).

- Clearly indicating that any comprehensive framework to support Adherents in strengthening information integrity and addressing threats posed by information manipulation **must be compliant with international human rights laws and obligations**. National legal and institutional frameworks should be developed in keeping with these international obligations, and cannot be allowed to become an excuse to infringe upon human rights obligations (*I. p.3*).²

Definitions

- Online information platforms refer to digital services that **collect, store, and disseminate information to users, often at their request, through public or semi-public channels**. These platforms include, for example, search engines, social media platforms, messaging platforms, user-generated content platforms, app ecosystems, and other interactive environments such as online forums and virtual worlds, where information sharing and curation are central to their operation (*I, p.4*).

Strengthen societal resilience

- Noting that **societal resilience also relies on transparent and accountable government, trust in democratic institutions and in public interest media**. These factors are key in building societal resilience against disinformation and information manipulation (*addition to III.*).
- Clearly state that researchers should be vetted as independent researchers according to **transparent criteria and by independent institutions**. Their research should be **free-of-charge** and conducted in the public interest. **Mechanisms should be in place to allow for appeals in cases where access is denied through the veto process** (*III. 2.b, p.5*).
- Ensure that **data access to public data** is not just limited to independent vetted researchers, but **also available to public interest actors** such as civil society organizations, research institutions, and journalists. Such access is possible under the European Digital Services Act (DSA). The OECD Recommendation should not provide for less data access than the DSA and Global Digital Compact³ (*III. 2.b, p.5*).

² UN Global Digital Compact ([A/79/L.2](#)), 23a

³ We recognize that responsible and **interoperable data governance** is essential to advance development objectives, protect human rights, foster innovation and promote economic growth. The increasing collection, sharing and processing of data, including in artificial intelligence systems, may amplify risks in the absence of effective personal data protection and privacy norms. We recognize the urgent need for strengthened data governance cooperation at all levels with the effective, equitable and meaningful participation of all countries and **in consultation with relevant stakeholders** to unlock the full potential of digital and emerging technologies. United Nations General Assembly. (2024). The Global Digital Compact: Annex to the Pact for the Future ([A/RES/79/1](#)).

- Clearly state that advertising databases should at **minimum include the following information**: who financed the ad, its target audience, the period of advertisement, and its reach and visibility (*III. 2.c, p.5*).
- Seek to establish **human rights-responsible advertising practices** by requiring advertisers to ensure that advertising does not risk human rights of individuals and groups/communities, and manipulate the information system; to **not engage in targeted advertisements based on sensitive data and perceived user traits**; to carry out thorough audits of advertising campaigns; compel transparency from ad tech platforms; and vet ad exchange supply partners for their adherence to human rights standards and commitment to uphold information integrity (drawing from [UN Global Principles for Information Integrity](#))⁴ (*III. 2c. p.5*)
- Regularly publish, in accessible formats and country-appropriate languages, information about their **content moderation procedures**, as well as about their **terms of service** and their respective changes over time, **community standards**, and **privacy and personal data protection policies** to help ensure that their actions are consistent with their own guidelines and policies that should also be based on human rights principles and standards (*III. 3.b, p. 5*).
- **Human-centric focus on vulnerable groups**: Emphasize the disproportionate impact of disinformation and cyberattacks on vulnerable groups, such as organisations of marginalised groups, civil society organizations, journalists, and humanitarian workers (*III. 5.c, p. 6*).
- Advocate for OECD member states to establish tailored **safeguards and resources to enhance civil society's resilience and security**, aligning with the draft's call for meaningful participation of civil society actors in governance (*III. 5.c, p. 6*)
- Acknowledge that there are **global inequalities in terms of the impacts of digital harms** and also in terms of institutional and social capacity to react in the face of harms. In that sense, a global approach is needed and should be reinforced (*III. 5.c, p. 6*).
- Ensure that civil society organizations and researchers have the necessary **independence and resources** to monitor and evaluate the impact of information manipulation and policy responses (*III. 5.c, p.6*).

⁴ Demonstrate advertising transparency. Clearly mark all adverts, making information on the advertiser, the parameters used for targeting and any use of AI-generated or -mediated content transparent to users. Maintain full, accessible, up-to-date and searchable advertising libraries with information on the source or purchaser, how much was spent and the target audience. Give detailed data to advertisers and researchers on exactly where adverts have appeared in any given timescale, and the accuracy and effectiveness of controls and services around advertising placements and brand adjacency. Undertake transparent reporting regarding revenue sources and sharing arrangements with advertisers and content creators. Clearly label all political advertising, including to indicate content that has been AI-generated or -mediated, and provide easily accessible information on why recipients are being targeted, who paid for the adverts and how much. UN (2024). [United Nations Global Principles on Information Integrity: Recommendations for Multi-stakeholder Action](#).

- Encourage the OECD members to **prioritize capacity-building programs** for civil society organizations and journalists, equipping them with tools and training to counter disinformation effectively (III. 5.c, p.6).

Enhance the transparency, accountability, and plurality of information sources

- Ensure **media sustainability and viability** in the age of online information platforms, among others, through collective bargaining and fair compensation while exploring policies to reduce media dependency on these platforms (*IV. 1.f, p.7*).
- Ensure that media transparency does not only cover the direct owners, but also the **beneficial owners** (*IV. 1.g, p.7*).
- Mandate **interoperability, data portability, unbundling of content hosting and content curation** to enable the sustainability of alternative platforms and recommender algorithms. Also consider public funding to support the development of public alternatives to for-profit recommender systems and diverse, alternative media and communication platforms (*addition to IV. 1.j, p.7*).
- Encourage the OECD members to **invest in resilient, safe, inclusive and interoperable digital public infrastructure**, transparent, safe and accompanied by the human rights impact and risk assessments and secure digital systems and user centred safeguards⁵ (*addition to IV. 1.j, p.7*).
- Further strengthen the availability and visibility of independent and pluralistic journalism by requiring online information platforms to give **due prominence to public interest media including community media** that have been identified as such through self-regulatory bodies and standards such as the Journalism Trust Initiative (JTI) (*addition to IV.2.*)
- Further strengthen the availability and visibility of independent and pluralistic journalism by requiring online information platforms to respect the **principle of political, ideological and religious neutrality** (*addition to IV.2.*)
- Expressly require online platforms to **move away from business models and practices that incentivize threats to information integrity**. This should not be left to the voluntary initiative of platforms, but should be legislatively enforced by the state through legal and policy measures, including by imposing a statutory duty of care on platform owners for addressing the individual and societal harms stemming from their business model and techno-design choices (*IV. 2.a. p.8*).
- Adopt business practices **based on human rights principles with a gender perspective** in order to contribute to information integrity (*IV, 2.a, p.8*).

⁵ The Global Digital Compact: Annex to the Pact for the Future ([A/RES/79/1](#)).

- Recognize the human resources employed for content moderation, **their respective labor and bargaining rights, and the need for mental health care measures to address the stress and trauma associated with moderating violent and abusive content.** Also, provide **training in content moderation for their human resources based on human rights principles and standards** (IV. 2.d, p.8).
- Advocate for stronger commitments to **transparency in online platforms' algorithmic decision-making, content moderation practices, and AI systems.** Promote **algorithmic pluralism** and ethical AI standards to mitigate the amplification of harmful content, supporting the draft's emphasis on fostering algorithmic accountability (IV. 2.c, p.8)
- Recommend enhanced **collaboration between platforms and civil society to monitor and address the dual threat deriving from the convergence of cyberattacks and disinformation,** especially concerning AI-generated content (IV. 3.c, p.9).
- Ensure that online platforms do not only collaborate with industry standards to trace AI-generated content but also with **standards for authenticity and provenance of content** (IV. 3.c, p.9).
- **Expressly recognize hate speech and online trolling as acts of violence** within the information ecosystem and risks to information integrity and call for actions by the governments and platforms. It is also important to have these terms defined in the definitional clause by referring to international and national legal and policy developments (IV. 3.d. p.9).
- **Ensure that age verification tools and other technologies that enable children's protection online do not compromise encryption or weaken other security protocols** (IV.4.c, p.9).

Upgrade institutional architecture and open government practices

- Expressly require **adherence to international human rights standards of legitimacy, necessity, and proportionality** in government measures to regulate speech on online platforms and media (V. 1. p. 10)
- Avoid undue pressure **on privacy rights** (V. 2.c, p.10).
- **Build upon existing international partnerships and cooperation frameworks** to strengthen the collective response to challenges to information integrity instead of creating new partnerships. Highlight the need for **integrating international cyber norms to combat information manipulation and ensure accountability** for

state-sponsored disinformation campaigns. Stress the importance of leveraging global cooperation frameworks to trace and attribute disinformation sources, in alignment with the draft's emphasis on building upon existing international partnerships (*V. 6.a, p.11*)

- Ensure multi-stakeholder governance and effective, sustained and meaningful **participation of civil society actors, journalists, and other concerned communities** in the governance of information integrity at all levels (*V. 8, p.12*).

Additional elements

- Enlarge the scope of the Recommendation **to take into account the challenges that artificial intelligence (AI) poses for information integrity** as recognised in the Recommendation of the Council on Artificial Intelligence. Generative AI notably in chatbots or visual, textual, and audio content creation creates numerous issues such as: unreliable information (i.e., hallucinations), invisibility and reducing traffic for public interest media sources, lack of fair compensation for media content in training data, and regurgitating news content.
- Call for instituting a **responsibility and accountability regime for different AI actors** (developers, deployers, platforms carrying AI generated content and users) corresponding to the systemic risk of the AI system to the information space and the level of involvement/control of the actor in perpetuating that risk.

Signatories:

- Africa Freedom of Information Centre (AFIC)
- Aláfia Lab, Brazil
- Agência Pública, Brazil
- Balkan Investigative Reporting Network (BIRN)
- Bangladesh NGOs Network for Radio and Communication (BNNRC)
- CIVICUS
- CyberPeace Institute
- DW Akademie
- Derechos Digitales, Latin America
- Digital Journalism Association (Ajour), Brazil
- Free Press Unlimited
- Fondation Hironnelle
- Forum on Information and Democracy
- Fundación Gabo, Colombia & Latin America
- Global Forum for Media Development (GFMD)
- Impress: the independent monitor for the Press, UK
- Journalists for Human Rights- JHR- Sudan

Forum on Information & Democracy



- IT for Change, India
- Maharat Foundation, Lebanon
- OBSERVACOM
- Reporters without borders (RSF)
- REPPRELCI, Ivory Coast
- Samir Kassir Foundation, Lebanon
- WACC - Communication for All
- WG on I3MD (Working Group on Information Integrity, Interoperability, and Media Diversity)
- TEDIC - Paraguay