

## Meta's Submission of Inputs to the Global Digital Compact (GDC)

April 2023

Meta is grateful for the opportunity to provide Meta's input on the Global Digital Compact (GDC). The GDC is intended to "outline shared principles for an open, free and secure digital future for all," and the multistakeholder consultation process toward its development has allowed interested parties to identify areas of agreement and future cooperation. The seven areas of the GDC identified in the Secretary-General's Common Agenda provide a useful framework to address some of the key challenges currently facing the digital space. Meaningful connectivity – including affordable internet access and digital literacy – is necessary to promote sustainable development in the digital age. Avoiding internet fragmentation through the free flow of data and interoperable frameworks is essential to ensuring the full enjoyment of human rights online. Policies supporting internet governance models that allow for localization and internet shutdowns should be explicitly opposed. Steps must be taken to protect data and ensure the protection of human rights online, while avoiding duplication of existing and ongoing UN workstreams. Meta takes instances of discrimination and misleading content seriously. We support promoting best practices to address these risks, as well as those associated with emerging technologies including artificial intelligence (AI), while maintaining an environment that fosters innovation and development. Finally, input from all stakeholders is necessary to further define and implement the protection of the digital commons as a global public good.

We support the leadership role of the UN in facilitating a global process to co-create principles toward an "open, free and secure digital future for all," and to improve global digital cooperation through the GDC. We believe that internet fragmentation threatens the fundamental principles that undergird the UN charter and would have an adverse effect on the protection of human rights, advancement of the SDGs, international peace, and security. With this in mind, we are in resounding agreement that the GDC must promote an open, globally connected, and secure internet with respect for human rights at its core.

This will require the GDC to focus on three main goals:

1. To place the enjoyment of universal human rights, including the rights to freedom of expression, and privacy at its heart;
2. To protect the free flow of data across borders; and
3. To promote a genuinely multistakeholder approach to cooperation that defends an open internet in which all stakeholders can come together to contribute their expertise.

We have seen firsthand the transformative power of digital technologies around the world, in times of crisis and particularly to advance human rights. For example, in Iran, protestors used WhatsApp and Instagram to advocate for women's rights, and following the recent earthquakes in Türkiye and Syria, digital tools were used to help provide reliable relief information and make sure those impacted can stay connected with their loved ones. Digital inclusion, connectivity, and human rights must be at the core of the GDC to realize the full benefits of digital technologies - and these values are consistent with Meta's mission to promote and uphold voice, community, inclusion, safety, and privacy.

We look forward to the GDC – and the UN Tech Envoy's Office – serving as a coordination mechanism for all workstreams related to global digital development and inclusion. The GDC should help create,

## Meta’s Submission of Inputs to the Global Digital Compact (GDC)

April 2023

coordinate, and communicate a more unified, one-UN narrative and approach to facilitate collaboration across UN departments and with external stakeholders, as well as to avoid duplication.

Meta continues to be a constructive supporter of workstreams related to the GDC, and we appreciate the Secretary-General's prioritization of these issues. We encourage all actors to embrace the UN’s values of openness, collaboration, and respect for human rights as we harness this new opportunity to reinforce the value – and power – that multistakeholder discussions can bring to defining a shared vision for our digital future.

<b>Connect all people to the global internet</b>	<b>2</b>
<b>Avoid internet fragmentation</b>	<b>3</b>
<b>Protect data</b>	<b>4</b>
<b>Apply human rights online</b>	<b>5</b>
<b>Accountability for discrimination and misleading content</b>	<b>6</b>
<b>Regulation of AI</b>	<b>7</b>
<b>Digital commons as a global public good</b>	<b>8</b>

## Connect all people to the global internet

For six years, Meta has partnered with Economist Impact, formerly the Economist Intelligence Unit, on a study known as the Inclusive Internet Index. A key finding is that while network coverage has continued to expand year on year, access to the internet remains far from universal.

Although 800 million people came online between 2019 and 2021, over two and a half billion people are still offline according to the ITU. Of these, 96% live in developing countries. Many others remain under-connected; they use the internet but do so infrequently. Previously, insufficient network coverage was the main barrier to internet access in many low- and lower middle-income countries. Growth in the number of people who use the internet has not kept pace with significant expansions in coverage since 2017, creating a gap in internet usage. The report found that people are unable, unwilling, or uninterested in using the internet and that affordability, relevance of, and trust in content available online remain significant barriers to closing the usage gap. Those who are left online often face less access to jobs, as well as critical e-health and e-education services that could contribute to socioeconomic development. Future work to close the digital divide and achieve meaningful connectivity for all by 2030, as highlighted in the SG’s Roadmap for Digital Cooperation,<sup>1</sup> should build on existing workstreams. The principles of

---

<sup>1</sup> “UN Secretary General’s Roadmap for Digital Cooperation.” <https://www.un.org/en/content/digital-cooperation-roadmap/>.

## **Meta's Submission of Inputs to the Global Digital Compact (GDC)**

April 2023

growth, inclusiveness, sustainability, innovation, and partnership put forward in the ITU's Connect 2030 Agenda<sup>2</sup> remain critical. UNESCO's ROAM-X indicators further elaborate specific metrics to monitor progress towards global meaningful connectivity.<sup>3</sup> These and other existing workstreams should be foundational elements of future agreements to promote access.

Making services and devices more affordable is key, as is creating the conditions for the growth of relevant local content, including in local languages which will drive demand and benefits. We have seen how social media, often paired with mobile connectivity, has unlocked myriad opportunities for local and grassroots voices to reach new audiences, and offers important lessons as the international community considers how to preserve, maintain, and expand opportunities for individuals to enjoy their right to expression.

Additionally, people need the skills to get online, create and consume internet content, and use digital tools safely. The GDC should recognize the barriers preventing people from accessing the internet and endeavor to improve the affordability and relevance of the internet, and the ability of people to draw value from it.

The GDC should hold member states accountable for their unique role in promoting efforts to expand connectivity to the internet in a responsible and accountable manner. In addition to bridging access gaps, governments have a role to play in advancing awareness, digital literacy, and safety for all people in their countries.

## **Avoid internet fragmentation**

To fully harness the benefits of the internet, particularly in support of achieving the UN SDGs, and to prevent adverse developments to the internet ecosystem, the GDC must promote an open, interconnected, and secure Internet - one that can deliver on the promise of inclusive connectivity for all by protecting the free flow of data across borders. The free flow of data is critical to accelerating the global economy, advancing the SDGs, promoting the free flow of information, and addressing the climate crisis. Digital products and services can only flourish in a trusted, safe, and secure online environment. However, we continue to see growing impediments through forced data localization and differences in domestic approaches, creating uncertainty for governments, businesses, and individual users.<sup>4</sup>

The GDC should embrace and emphasize internet freedom as foundational to the enjoyment of human rights in the 21st century. In addition, it should explicitly oppose data localization and encourage the interoperability of frameworks to promote the free flow of data, while upholding privacy standards. This should take into account the ongoing work by the OECD on the topic, including on the work on Trusted

---

<sup>2</sup> ITU. "Connect 2030 – An agenda to connect all to a better world."

<https://www.itu.int/en/mediacentre/backgrounders/Pages/connect-2030-agenda.aspx>.

<sup>3</sup> UNESCO. "ROAM-X Indicators." <https://en.unesco.org/internet-universality-indicators/roamx-indicators>.

<sup>4</sup> "G7 Vision for Operationalizing DFFT." [https://g7digital-tech-2023.go.jp/topics/pdf/pdf\\_20230430/annex1.pdf](https://g7digital-tech-2023.go.jp/topics/pdf/pdf_20230430/annex1.pdf).

## Meta’s Submission of Inputs to the Global Digital Compact (GDC)

April 2023

Government Access to Private Sector Held Data. The GDC should call for globally harmonized approaches to internet governance that promote the free flow of data across borders, safeguard encryption, and ensure that individuals’ rights, like the rights to privacy and freedom of expression, are protected online.

The GDC should also reinforce a global commitment to a multistakeholder model for internet governance and avoid non-duplication of existing work streams and fora. Given the complexity of the internet with overlapping rights and responsibilities across sectors and borders, a multistakeholder approach remains essential to preserve the Internet as a global platform. The UN has been at the forefront of establishing a multistakeholder approach as the norm. Stakeholders should aim to strengthen and leverage existing processes and venues, such as the Internet Governance Forum (IGF), ensuring funding, inclusive participation, and effective outcomes.

The global internet is increasingly at risk of fragmentation and is under threat as the result of growing trends, including national restrictions that seek to control citizens’ access to information, data localization laws and restrictions on international data flows, and internet shutdowns. Actions by governments to limit or shut down the Internet only expand digital divides and create structural barriers to connectivity. Digital censorship and internet shutdowns can be markers of deteriorating human rights conditions, and have critical impacts on social, economic, and political development.

To protect an open internet, the GDC should call for member states to promote the open nature of the Internet, protect human rights as anchored in the values and obligations of the UN Charter and the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights, protect and promote the free flow of information, safeguard encryption to ensure the protection, and commit to the multistakeholder governance model of the internet. A fragmented internet also prevents shared principles of responsible behavior and accountability. It is essential to promote a globally shared understanding and frameworks for governments, industry, and users to build and maintain the internet as a globally accessible, open, free, safe, and secure environment.

## Protect data

We welcome the High-Level Panel’s recommendation to further develop a global commitment on digital trust, safety, and security. To promote an open and free internet, governments, industry, and civil society need a shared vision, standardized implementation of norms for responsible uses of technology, and agreed priorities for further action. We also look forward to further consultation and cooperation on developing and deploying information and communication technologies (ICTs) in a trustworthy manner, thus encouraging voluntary, risk-based approaches to cybersecurity, and incorporating standards developed by global organizations through multistakeholder processes. We offer our support to complementary capacity-building initiatives for the public and private sectors in an effort to better prevent and react to harmful, malicious, and hostile behavior online. We have already created

## **Meta's Submission of Inputs to the Global Digital Compact (GDC)**

April 2023

partnerships with several UN departments, both at the HQ and country level, as well as with civil society entities, and look forward to the creation of more.

Focusing on harmonization of interoperability requirements can enhance experiences, protect user privacy and security, and incentivize industry to create innovative new services. Interoperability tools have been and remain an important part of the digital ecosystem. Everything from foundational internet protocols and web standards to email rely on a set of interoperability solutions. In general, it is important that stakeholders keep in mind there is no one-size-fits-all approach to interoperability. Every product, platform, market, and ecosystem will have very different interoperability needs. The question we should ask is how to encourage the development of foundational models, frameworks, and tools that will offer the necessary preconditions for interoperability.

Various UN processes have recognized cybersecurity as an essential dimension of international security and provided valuable guidance on how to maintain an open, free, and secure internet. The spread of disinformation and, in particular harmful, life-threatening content and disruptive blanket internet shutdowns, have been identified in the Secretary-General's Roadmap for Digital Cooperation as challenges we need to collectively address. For people to feel safe and free to use digital products and to communicate online, the online environment must also be sustainable. We therefore welcome an emphasis on the linkage between principles of digital trust and security and the ability to realize the 2030 Agenda: Achieving a trusted, safe, and secure online environment requires regarding cybersecurity not just as an international security issue, but also as an area of governance where governments, industry, and civil society all play a role.

The internet needs guardrails, not roadblocks. Many are drawn to the idea of digital sovereignty, whereby establishing digital walls at their national borders they can better secure data generated by their citizens. We urge governments to resist protectionist policies that enable the misuse of how personal data is processed, stored, and secured. Instead, under such policies, the internet becomes less open, and the digital economy becomes more constrained. We support working with governments to adopt data regulation that preserves the fundamental human rights of individuals, holds companies accountable, and promotes security.

We support the use of end-to-end encryption against overreaching surveillance and encroachments on freedom of expression. End-to-end encryption is a powerful tool for security and safety. It helps journalists communicate with sources without governments listening in and gives citizens in authoritarian regimes a lifeline to human rights advocates.

## **Apply human rights online**

The protection of human rights is central to the UN's mission, and cooperation among all stakeholders is essential to ensure that all rights, such as privacy and free expression, are protected online. Discussions

## Meta’s Submission of Inputs to the Global Digital Compact (GDC)

April 2023

around the protection of human rights in the digital age should focus on the obligations of governments, as well as the responsibilities of companies to protect freedom of expression, to protect people from incitement to violence, hate speech, harassment, and other online harms, and to enable participation in political activities. Given the central role that it plays in international politics and policy setting, the UN is uniquely placed to ensure the vision of multistakeholder engagement with governments, civil society, and the private sector. The UN has a track record of engaging the private sector on these issues. As the leading UN entity on human rights, OHCHR plays a key role as a convener and thought leader in this area including through the Business and Human Rights in Technology (B-Tech) initiative. These discussions should work to advance the goals outlined in the Secretary-General’s Roadmap on digital human rights, such as addressing protection gaps, discouraging internet shutdowns, and providing more detailed guidance on the application of human rights standards in the digital age. We must acknowledge the threat to human rights embedded in harmful and hostile activities that states and non-state actors undertake online. Cybersecurity and the protection of human rights and freedoms online must go hand in hand.

Meta’s human rights policy sets out the human rights standards we strive to respect including the [United Nations Guiding Principles on Business and Human Rights](#) (UNGPs). It sets out how we seek to apply these standards to our apps and products, policies, programming, and overall approach to our business. It describes our commitments to due diligence and reporting, as well as our commitment to protect human rights defenders and the governance mechanisms that seek to hold us accountable.

The Global Network Initiative (GNI) provides a framework for how information and communications technology companies and their human rights stakeholders can protect people's rights to freedom of expression and privacy against overly broad or unlawful government requests. Meta has been a member of GNI since 2013. GNI members commit to following the GNI Principles and its Implementation Guidelines and are subject to an audit every 3 years to ensure they are meeting their commitments.

## **Accountability for discrimination and misleading content**

We recognize the shared challenge of ensuring safety online and encourage multistakeholder cooperation to help individuals, especially youth and vulnerable groups, make healthy decisions online, stay safe, and build resilience. We encourage innovation, including the use of artificial intelligence (AI), to help enhance efforts to address harmful content. We urge the GDC to consider existing recommendations such as the OECD Recommendation of the Council on Children in the Digital Environment. The GDC should also build on the existing work of the UN system, such as UNICEF’s programs on Child Rights in the Digital Age and the ITU’s work on Child Online Protection. In fostering a safe online environment, the GDC should recognize the importance of educating and equipping individuals with digital skills and literacy, so users are empowered to make informed choices online and discern mis/disinformation.

The GDC should consider ongoing concerted efforts and investments of social media companies to strengthen transparency in addressing misleading, harmful, and discriminatory content online, by

## Meta’s Submission of Inputs to the Global Digital Compact (GDC)

April 2023

promoting awareness of users’ rights to report content – and appeal content moderation decisions – and understand protections afforded to individual users. In addition, the GDC should recognize the importance of a whole-of-society approach in fostering internet freedom and digital inclusion. A wide range of relevant stakeholders have roles and responsibilities in dealing with online safety and harmful content, including public authorities, civil society, parents/caregivers, content creators, and people who use the internet each day. Whole-of-society collaboration helps improve understanding of the safety activities of digital platforms, which in turn increases opportunities for meaningful and effective collaboration.

Any effort toward creating a safer digital ecosystem should prioritize human rights-based, evidence-based, and data-driven approaches that remain grounded in the principles of necessity, proportionality, and legality. We welcome efforts to create multistakeholder spaces for collaboration that allow for innovation and experimentation, while helping to delineate the roles and responsibilities of governments, companies, civil society organizations, and the technical community. The GDC is correctly placed to call on governments to invest in fostering inclusive societies, enhancing digital safety and literacy, and supporting victims and survivors of abuse. The GDC should call on companies to adopt multidisciplinary, evidence-, and risk-based approaches that empower users with tools and resources to customize their experiences to protect their privacy and safety, as well as to report any harm they encounter. The GDC can recognize ongoing industry efforts to combat harm against targeted communities and encourage companies to participate in tools that combat the spread of non-consensual intimate images, such as [StopNCII.org](#) and [TaketDown.NCMEC.org](#).

## Regulation of AI

When it comes to emerging technologies such as AI, international cooperation can help ensure that countries around the world benefit from applications that support sustainable growth. International collaboration and interoperability across governance frameworks is crucial for the development of a responsible AI. Organizations such as the OECD, UNESCO, and GPAI are already working on those issues, and should look at enabling policy frameworks that address the opportunities and challenges with AI.

AI regulation should take into consideration existing frameworks that address issues around AI, including data protection, consumer law, competition law, and sectoral regulation, to avoid creating conflicts. This will help to provide greater legal clarity, avoid duplicative regulation, and ensure a proportionate approach to these novel issues. For those countries that may not have developed relevant existing legislation, in certain areas a good starting point would be the OECD AI Principles, around which there appears to be consensus, and which are rooted in human rights and consumer protection.

Rather than creating inflexible rules, countries should focus on supporting and building on ongoing efforts to establish best practices and standards. And rather than providing prescriptive technical requirements, stakeholders should work together to provide opportunities for development and regularly update the standards and best practices for assessing, measuring, and comparing AI systems as they evolve. The

# Meta’s Submission of Inputs to the Global Digital Compact (GDC)

April 2023

development of AI standards and regulations should be underpinned by a risk-based approach, focused on the most sensitive types of AI applications and sectors such as in cases where AI may produce decisions that cause legal or similarly significant effects. Above all, policymakers should not regulate the technology. There is a distinction between regulating the technology and regulating the uses of that technology. Regulators should focus on the latter.

The GDC should prioritize the coordination and collaboration among the many experts and stakeholders of the AI ecosystem and ensure that regulators’ legislative strategies complement other co- or self-regulatory instruments (e.g., international AI principles, standards, ethical codes of conduct, NIST AI Risk Management Framework).

Future agreements like the GDC should not duplicate existing workstreams, such as the OECD’s Guiding Principles on AI, GPAI, or UNESCO. Rather, they should build on their progress to establish consistent international positions that support the development of AI that benefits society in a responsible way. The GDC should take into consideration the recommendations from the recent Business at the OECD report on implementing the OECD principles<sup>5</sup> to help ensure trustworthy AI, and the GDC could reflect some of the practical findings from that report to build on the OECD’s work and help facilitate principles, regulation, and governance frameworks that are both effective and practical.

Governments, through their regulatory agencies, should explore the implementation of Regulatory Sandboxes (RS) to foster the development of new products and services within existing regulatory frameworks, as well as Policy Prototyping Programs (PPPs) as methods to test future laws and regulatory frameworks instruments on AI and other emerging technologies. Given the difficulty in assessing the most appropriate, feasible, and balanced legislative instruments on a complex topic such as algorithmic accountability, PPPs can provide a safe testing ground to assess different iterations of legislative models of governance prior to their actual enactment. An example of this type of collaboration is Open Loop, a global strategic initiative by Meta that promotes and deploys experimental regulatory efforts in the field of new and emerging technologies. It supports the co-creation and testing of new governance frameworks through policy prototyping programs and enables the evaluation of existing legal frameworks through regulatory sandbox exercises.

## Digital commons as a global public good

It is well acknowledged that no entity or stakeholder group can provide or sustain the internet, digitalization, and information society on their own. Work is ongoing to define the respective roles of governments, industry, and civil society. However, it has also been acknowledged that the risks and threats of using the internet and digital products and services has grown significantly in the past decade. To sustain ICTs as a source of economic and societal benefits, it is essential to promote the accountability

---

<sup>5</sup> Business at OECD. “Implementing OECD AI Principles: Challenges and Best Practices.” <https://www.businessatoecd.org/blog/implementing-oecd-ai-principles-challenges-and-best-practices>.

## Meta's Submission of Inputs to the Global Digital Compact (GDC)

April 2023

of all stakeholders – governments, industry, and users – for maximizing the potential of these technologies, while doing their part in countering harmful, violent, and hostile activities and trends online. Promoting inclusive and comprehensive governance mechanisms and whole-of-society approaches to assessing and mitigating risks can help accelerate shared stewardship of the economic and societal benefits of ICTs and the emergence of a global vision of digital commons as a public good. In developing the concept of digital commons, we must be cognizant of analogies as the term "global commons" is typically used to indicate the earth's shared natural resources and cannot be directly applied to the internet, ICT infrastructure, and digital products and services that rely on the contributions and innovation of humans.

The GDC could offer an opportunity for various entities and stakeholders to develop a definition, framework, and/or vision for the "global digital commons" building on the proposals of the Tech Envoy and ongoing efforts focused on digital public goods. We see at the core of this concept a responsive, co-designed, co-governed, "safe" space anchored in respect for human rights, which we are striving to help create and protect. Discussion of the ways to create a shared understanding of and approach to global commons as a public good should not depart from the preamble of the UN Charter: *our shared commitment to promoting social progress and better standards of life in larger freedom and developing digital products, services, and infrastructure for the promotion of the economic and social advancement of all peoples.*