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CCIA's feedback on the European Commission's inception impact assessment on the European Democracy Action Plan

The Computer & Communications Industry Association (CCIA) welcomes this opportunity to provide comments.

Like every form of communication before it, the Internet can be misused. CCIA members acknowledge the existence of rogue players who seek to inflict harm on others, whether to seek profit or to promote hatred. CCIA members continuously invest resources in technology and human review to keep their services trustworthy and safe from rogue players and illegal conduct. Companies regularly review their policies and programmes to ensure that everyone can stay safe and informed, and express themselves online. It is in our members self-interest to remove disinformation, fake news, or terrorist content from their platforms, once notified.

The EU and its Member States are increasingly considering policy responses to address the spread of disinformation online. Addressing disinformation and protecting election integrity requires the participation of many involved entities such as governments, regulators, election authorities, political parties, NGOs/civil society, online platforms, publishers as well as the general public. An initiative that wouldn't reflect this multitude of actors would not be effective.

It is also important to highlight that each online platform is different and each platform thus takes different actions to address disinformation. As a result, reporting on platforms' actions will require a certain level of differentiation, which makes it difficult to develop unified measurements and performance indicators to assess the efficiency of these efforts.

The decision on what type of content should stay up or be brought down should not be defined by private players, nor political regimes. Policymakers have to be very careful to not place too much power to determine falsehoods in the hands of intermediaries or governments, without adequate and timely oversight processes, particularly by the judiciary.

It is critical to acknowledge that disinformation is often not illegal per se, so tackling it requires a different set of tools and policies than when addressing illegal content. It is critical to ensure that the freedom of expression is protected. Addressing disinformation by focusing on removals is not sufficient and could have adverse effects, the solution requires a broad set of tools and activities, ranging from promoting authoritative content, supporting fact-checking efforts, and providing media literacy training to the public.

CCIA and our members are committed to tackling the dissemination of disinformation. For instance, some CCIA members have signed the EU Code of Practice on Disinformation and are publishing yearly assessment reports. We support the European Commission's multilateral approach. The Code is particularly useful to address disinformation as it creates room for discussions among different parties, notably the EU institutions and digital service providers. The EU could consider creating an associated Forum, like it did with illegal content and the EU Internet Forum. It is important to involve the various players to tackle disinformation effectively.

CCIA members want to help people better understand the sources of news content so they can make informed decisions about what they're reading. Through these high transparency standards, the readers are made aware of the source and can form their own opinions. For instance, CCIA members may label



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state-controlled media and independent media differently. CCIA members aim to allow each user to form its own judgements based on a variety of valid and trustworthy content while all users have the opportunity to express themselves online.

We welcome the forthcoming European Democracy Action Plan and we stand ready to share industry experiences and provide constructive suggestions. The Action Plan is an opportunity to limit unlawful election interference and manipulation, strengthen online rights, and clarify rules for all players. We are very much looking forward to working with policymakers and exchanging information on how to address disinformation and protect elections integrity.

Respectfully submitted,

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