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Global Industry Perspectives on UNESCO Internet for Trust Initiative

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Industry supports multi-stakeholder discussions on digital platform governance that bring together global voices on shared approaches and recognizes that all stakeholders have a role and important responsibilities in ensuring a free and open Internet. Stakeholders have an interest in working together to ensure that the digital environment is a safe, engaging and constructive place for all users, and also enables new users to grow and develop 21st century skills.

UNESCO has announced work on developing guidelines for regulating digital platforms and is currently engaged in consultations with stakeholders to shape the final outcome. Global industry representatives take the opportunity to provide general views and recommendations for this important work. Industry notes the progress made in the latest iteration of the draft 2.0 to address some of these concerns, and encourages continued consultation with all stakeholders to further shape the guidelines.

- **Ensure an Open and Deliberate Process.** The process should endeavor to be more open and participatory. There should be continued solicitation for input from multiple stakeholders including civil society, academia, and a broad range of industry representing different digital platforms and other businesses, structured consultation with adequate time for comments and release of updated drafts, and information publicly available on the process.
- **Adopt a Risk-based, Principles-Based Approach.** Consistent with UNESCO's stated goals, the guidelines should establish principles that highlight the value of risk- and systems-based approaches to regulation. For example, principles embracing concepts such as linking mitigation efforts to the level of risk and promoting transparent systems, policies, and processes for content moderation are not only globally scalable, but retain relevance as technology rapidly evolves. This will not only prevent market fragmentation but also help future-proof these guidelines. Likewise, a principles-based approach that is content agnostic would limit the risks to freedom of expression and avoid different interpretations across industry and jurisdictions.
- **Protect Human Rights Including Free Expression.** Principles identified in the work product should be harmonized with preexisting international human rights frameworks and should avoid any unintended negative impact on human rights, including freedom of expression.

- **Recognize and Embrace Existing Industry Standards and Practices.** As the UNESCO principles contemplate regulation of private digital platforms, they should reflect the structure, standards, and lessons from the UN Guiding Principles on Business and Human Rights and recognize that government intervention including through regulation is not the only available tool. The recommendations should acknowledge existing work such as industry-led best practices, voluntary standards, codes of practice, and other self-governance solutions that can help test new solutions, build trust with diverse stakeholders, and be much more successful than regulations in many cases.
- **Recognize Relevant Responsibility of All Stakeholders.** The discussion should contemplate the relevant commitments and responsibilities of all the stakeholders, not only platforms. A sole focus on platforms could have the perverse effect of being a tool for authoritarian regimes to legitimize imposing restrictions to freedom of expression and other human rights.
- **Promote Cross-Industry Collaboration.** Open channels of dialogue and collaboration between the relevant stakeholders and across industries is essential to reach a balanced, risk-based approach. Different stakeholders bring varied and enriching views on how to address the responsibilities of the different types of actors involved in order to better protect freedom of expression and access to information.
- **Recognize the Role of Media and Digital Literacy to Combat Misinformation and Disinformation.** At a time when the international community is making progress in closing the digital divide, the discussion should contemplate how to improve the quality of public debate. Media literacy plays a critical role in limiting the spread of disinformation and misinformation, and public education initiatives on improving media and digital literacy for citizens around the world are essential.
- **Recognize the Different Regulatory Frameworks Across Jurisdictions.** Issues around content rarely exist in a vacuum. The services as discussed are already subject to regulations from multiple authorities across jurisdictions: competition, personal data, consumer protection, etc. There is no one-size-fits-all model of regulation, and some regulatory proposals may overlap with other regulated sectors or issues.
- **Recognize UNESCO's Core Competencies.** UNESCO should ensure that the Internet for Trust initiative appropriately aligns with the organization's unique areas of expertise and competence so that it usefully complements, and avoids any risk that it duplicates, existing initiatives on this topic, including regulatory efforts already underway.