

The Global Disinformation Index (GDI) is a not-for-profit organisation focused on defunding and disrupting disinformation. We welcome the opportunity to submit the following response to the Special Rapporteur's call for comments on opportunities, challenges and threats to media in the digital age.

1a. What are the key trends, threats or challenges to the freedom, independence, pluralism and diversity of media and the safety of journalists in your country, region, or globally in your view?

One of the key motivations for actors to create disinformation is financial: content that triggers strong negative emotions (i.e. hatred, greed, envy, etc.) tend to generate the most clicks — and the most ad revenue. Over 21 months, GDI has documented advertising from 400+ well-known brands next to disinformation on over 20 ad servers that are providing a funding stream to sites peddling disinformation. The narratives being financed range from anti-science content that claims COVID-19 vaccines are deadly to holocaust denial. For more evidence, see:

<https://disinformationindex.org/research/>

- The GDI estimates that disinformation sites generate more than a quarter billion dollars per year in ad revenues. See: https://disinformationindex.org/wp-content/uploads/2019/09/GDI_Ad-tech_Report_Screen_AW16.pdf
- A study from the Incorporated Society of British Advertisers (ISBA) found that nearly one in every three ad dollars could not be traced once they entered the ad tech system. <https://www.isba.org.uk/media/2424/executive-summary-programmatic-supply-chain-transparency-study.pdf>

The current ad-tech ecosystem threatens the diversity and independence of media by providing a monetary incentive to peddle disinformation — this artificially amplifies extremist narratives. As journalists have been laid off (even at publications with large audiences like BuzzFeed) and media outlets have gone under, a journalism vacuum has emerged that is now being filled by junk content devoid of reality and designed purely to get “eyeballs” (and ad dollars). Only by shifting the funding ad-tech pipeline back towards credible journalism can we hope to ensure diversity and independence within our media ecosystems.

1b. To what extent have trends, threats and challenges emerged, or have been aggravated, because of the policies and practices of digital and social media platforms?

Currently, many companies have introduced advertising and publishing policies to restrict what ads can run on their networks. But these policies are often inconsistent, not standardised or aligned, and not enforced. For example, GDI found that for [COVID-19](#) disinformation policies, many ad tech companies simply had no policies.

As GDI has also documented many online ad policies are absent for a range of harmful content, including content that **violates key human rights-related issues** (such as for gender, sexual orientation, racial and/or religious discrimination).

Additionally, internal company **advertising and publishing policies do not always align**: for example, [Verizon's advertising policy](#) specifically bans COVID-19 disinformation ads, but it has no provisions for delivering ads next to [COVID-19 disinformation stories](#).

And when the policies do exist, they are not being enforced. The results of this problem are clear. [GDI estimates](#) that just in the EU, tech companies pay out annually out more than US\$76 million in ad revenues to known disinformation sites targeting member states.

The solution is to develop a standardised code of conduct for advertising companies which guarantees that advertising and ad publishing policies are aligned and strictly enforced. Policies need to be harmonised and take a whole-of-industry approach to the problem. Ideally this would extend to other online monetisation services to ensure that these companies also have policies against funding harmful content and disinformation.

1c. Please highlight the gender dimensions of these trends and their consequences for the equality and safety of women journalists as well as media freedom.

The GDI views disinformation through a lens of [adversarial narrative conflict](#) which creates division and anger among individuals and seeks to uproot trust in institutions. Since adversarial narratives exploit already existing societal tensions, **disinformation disproportionately targets marginalized groups** — including women, nonbinary, and transgender individuals. GDI has already documented [several examples](#) where popular

brands have inadvertently [provided funding towards misogynistic disinformation](https://disinformationindex.org/research/). A report revealing how much advertising revenue goes towards each adversarial narrative — including misogyny disinformation — will be published by GDI within the next upcoming weeks and will be found at: <https://disinformationindex.org/research/>

2. What legislative, administrative, policy, regulatory or other measures have Governments taken to promote press/media freedom, including media independence, pluralism, viability and ownership issues? What has been the impact of these measures? What changes or additional measures would you recommend?

GDI has recently examined the current legislation approaches of a dozen countries to address the problem of disinformation and online safety. Our study provides an overview and captures the gaps in the approaches of these governments that need to be addressed. It can be found here:

<https://disinformationindex.org/wp-content/uploads/2021/09/2021-09-29-GDI-Global-Policy-Snapshot-Online.pdf>

In the sample of countries analyzed, GDI found that measures to counter disinformation and promote healthy media ecosystems often lacked a focus on the financial incentives behind disinformation. Additionally, current initiatives such as “soft” regulatory measures that address ad-funded disinformation, such as the voluntary code in Australia, are still too nascent to determine whether platform signatories will adequately adopt measures to address the funding of disinformation. Furthermore, among the list of current signatories to the Australian code, key players are visibly absent. This includes Amazon, Stripe, eBay, Etsy, and PayPal. Sanctions have been criticized as being too light or too harsh, which has spurred concerns over their effectiveness.

Policies that tackle the monetary incentives behind the creation of disinformation avoid the perils of possible infringements of freedom of speech, while still promoting healthy media ecosystems by addressing the funding and artificial amplification of disinformation. This could include setting an industry-wide floor of platform policies that are both comprehensive and enforced — prohibiting the placement of advertisements beside harmful content and the monetisation of disinformation through e-commerce.

8. Do you see any major gaps in the international human rights legal framework? Are there any specific recommendations that you would suggest to address such gaps or to improve implementation of existing standards?

Freedom of expression is a fundamental value for democracies under Article 19(2) of the International Covenant on Civil and Political Rights. This relates to the right to access information and press freedom.

Digitalisation and open access to social networks have enabled a gateway to the violation of human rights, which the UN Human Rights Council has highlighted must be addressed as much online as offline. Digital business transformation has increased citizens' vulnerability to hate speech and disinformation, facilitating state and non-state actors to weaken freedom of expression. The GDI views disinformation through the lens of [adversarial narrative conflict](#) which creates division and anger among individuals and seeks to uproot trust in institutions. When viewed through this lens, **disinformation undermines human rights** by undermining recognition, protection and fulfillment of these rights.

The GDI believes that effective measures include:

- A human rights-based approach to assess disinformation and proportionate responses by looking at the harms it generates.
 - For example, COVID-19 disinformation undermines the ability to respect, protect and fulfill the right to health (Article 12, International Covenant on Economic, Social and Cultural Rights).
- Addressing the financial incentives of disinformation as an effective approach to respect, protect and fulfill the human rights framework.
 - There is no right to profit from the spread of one's ideas. There are clear ways to reduce funding to disinformation from online ads, e-commerce, e-payment and other monetisation channels while respecting one's right to expression and information

9. The Special Rapporteur would welcome examples of good practice by Governments, companies, the media sector, civil society and other stakeholders, and your recommendations on how best to address the challenges and threats to press/media freedom, independence, diversity, pluralism, and safety of journalists. Please share any relevant documents, reports, news or academic articles that you believe should be considered in the preparation of her report.

The GDI has assessed the disinformation risk of the online news markets in eighteen different countries — from [France](#) to [Kenya](#), and [Canada](#) to [Brazil](#). These reports would be useful for informing the Special Rapporteur's understanding of the current state of media ecosystems worldwide, and can be found here, along with GDI's other research publications: <https://disinformationindex.org/research/> Additionally, GDI's recent

[investigation of the current policy](#) for online safety and disinformation in 12 countries would inform the Special Rapporteur on the current state-of-play for policy regarding disinformation and the past pitfalls and successes of different regulation strategies in the media sector.