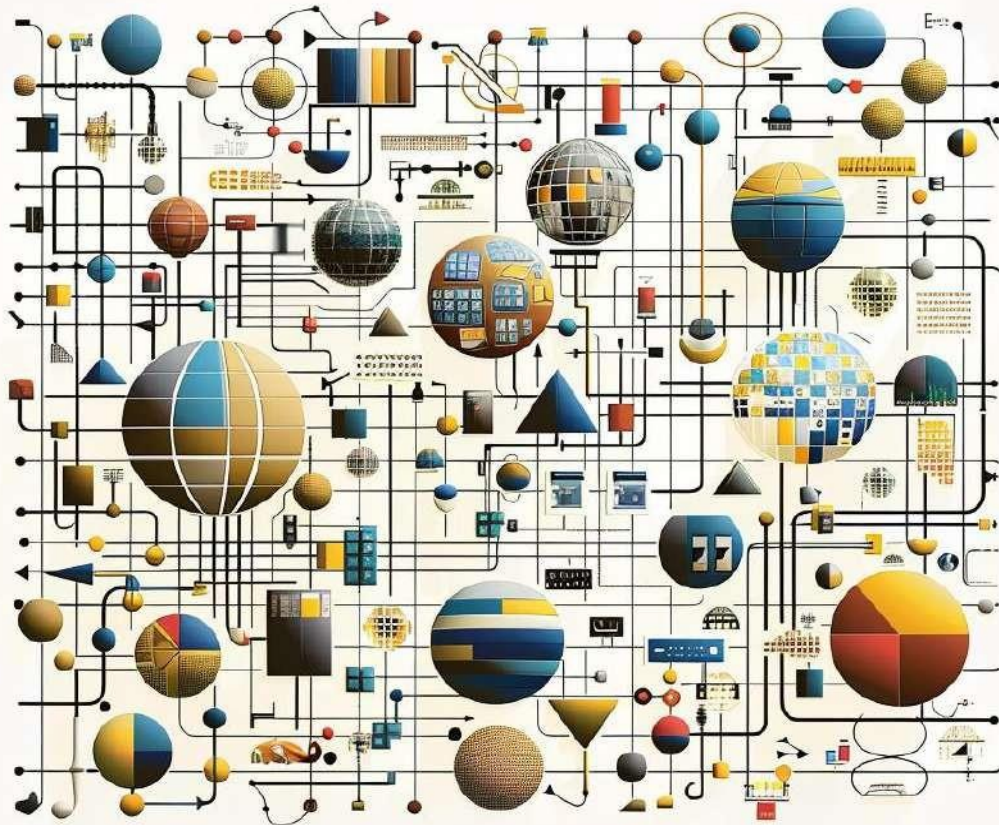


DISCUSSION PAPER VER. 2

An Interoperating Social Media Environment: One Necessary Response to the Issue of Information Integrity



Working Group on
Information Integrity, Interoperability
& Media Plurality

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Abstract:

The problem of mainstream media concentration was no stranger to pre-digital times. But social media networks have extended the reach and audiences to a global scale, deploying tools and business models that retain people's attention and introduce significant new distortions in information's flow and consumption. While claiming not to be publishers, they undermine business models and sustainability of many media, and concentrate immense gatekeeping powers into a few corporations largely beyond the reach of regulators. This is directly relevant to the G20's focus on information integrity.

The current efforts to mitigate the problem of information integrity focus on trying to make Big Tech players behave. However, how 'integrity of information' or the 'truth' is navigated and defined in social systems is a complex, open-ended, and wider process. An effective response must address the full breadth and complexity of the issues, by ensuring an interoperating plural digital media ecology, replacing the current concentrated Big Tech social media space.

To achieve its goals, this policy brief will present the following proposals:

- (i) We aim to provide an understanding of the intricate dynamics between existing business models, media concentration, and their impacts on economy, sustainability, freedom of expression, and democratic processes.
- (ii) We will suggest regulatory proposals, complemented by workable tech and business models, that ensure interoperability and support democratic media, enabled by appropriate policies to address disinformation, enhance diversity, and guarantee freedom in democracy;
- (iii) Our recommendations will be grounded on existing literature, policy documents and regulatory practices.

The proposed work aligns with G20's commitment to addressing global challenges in promoting a diverse, plural and resilient digital media ecosystem, promoting information integrity, and sustaining democratic values globally.

Diagnosis of the issue:

Social media opened up media and informational space to everyone, circumventing gatekeeping by traditional institutions. At first, claims abounded about its positive impact on our societies. Soon enough, however, some new and virulent forms of hate speech, incitement to violence, and other illegal content, alongside large-scale disinformation and misinformation, emerged. Many now believe that these threaten the very fiber of our societies and democracies.

As the need for identifying, removing, labeling, and inhibiting 'bad content' become apparent, we are now at a point where active responses by big platforms, and by legislatures, are being planned or implemented, but largely in a piecemeal, 'whack-a-mole', fashion. The problem is that these fail to address the systemic issues of how new digital media and social media operate. It is also generating new problems whereby already powerful actors, big businesses and governments, seem to become the arbiters of what is acceptable and have the right of way in information and discourse, and what does not.

The growing use of the term ‘information integrity’ does elevate the problem, and therefore the necessary responses, to a systemic/structural level. A recent intergovernmental declaration,¹ including many G20 countries, defines ‘information integrity’ as “an information ecosystem that produces accurate, trustworthy, and reliable information, meaning that people can rely on the accuracy of the information they access while being exposed to a variety of ideas”, and stresses that a “reliable, safe and diverse information ecosystem online can foster open, free and inclusive public debate”.

Such a systemic/structural definition of the ‘information problem’ should now also produce systemic/structural responses to it. But this is unfortunately still not the case. Even worse, an adequate theoretical framing of which structures and systems must be targeted, and how, has also not been developed. In default, we continue to witness an ever-losing game, even as the targets keep shifting fast.

Meanwhile, the byproduct of such piecemeal responses, i.e. big business and big government haphazardly reshaping information ecosystems, is beginning to look like a remedy that could, in the final analysis, be worse than the original problem.

A pragmatic way to begin looking for solutions to new challenges of the digital information ecosystem is to look back at the ‘old ecosystem’ and see what has changed to have caused these new problems. In the traditional information/media ecosystem, a variety of diverse media institutions mediated between people and sources of information and views. Today, there seems to be a loss of (1) such ‘institutional mediation’, and (2) the diversity of the institutions involved.

Efforts to address the loss of institutional mediation include various new forms of ‘policing of content’. But, unlike earlier times, the power to do so is highly concentrated within a very few global monopoly platforms and increasingly within government agencies as well. The dimension not being addressed is the diversity and independence of the previous mediating institutions, ranging from national and international private media to public and community media.

Networks of fact-checkers² are now being deployed to ‘create’ some diversity, but these will also require some legitimization either from the monopoly platforms or governments or both. This is obviously problematic, since the informational controls may only become subtler (and perhaps deeper), but do not go away.

A plurality and diversity of mediating informational institutions cannot, and should not, be ‘created’ from above. They must emerge from below, from society. The role of the governments is to create and sustain structural conditions for the emergence, independence and sustainability, of such plural and diverse information intermediaries, or media.

Creating, through law and policy, such structural conditions for a plural and diverse digital media environment – which in practical, digital technical/business, terms can be called ‘interoperating (diverse) social media environment’ – is therefore necessary, though certainly not sufficient, condition to address the twin issues of ‘information integrity’ and freedom of expression. Freedom, plurality and diversity of information, in fact, are complementary components of a genuine ‘information integrity’.

¹ [Government of Canada, Global declaration on information integrity online](#)

² European Commission, New call for proposals supports EU fact-checkers in debunking disinformation, 9 October 2023, available at: <https://shorturl.at/itURJ>; EU Disinfo Lab, European fact checking standards project, available at: <https://shorturl.at/2Fvsz>

Considerations and Recommendations:

1. Information integrity may be viewed as a combination of ‘source integrity’ and ‘factual integrity’. Ensuring transparency for users of the source and nature of origin and transmission of a particular piece of information is primarily a technical challenge. This must be ensured. But a much harder nut to crack is of ‘factual integrity’. None can have a monopoly over facts and truth. An essential component of a sustainable solution, in this regard, therefore, is to increase the diversity of media/information, allowing users to triage and to configure their ‘own matrices of truths’ at the personal, group and/or community levels. These matrices and their output will meanwhile remain continually contested – and hopefully formed and reformed – by informational/media diversity around them.
2. Thus, at the heart of any new digital information environment designed to maximise the public interest there must lie a range of mechanisms and measures that can enable (including through mandating) plural and diverse actors – from those involved in the production of information, to those distributing it– *to freely interoperate, in a manner that their potential users are not overly dependent on any particular parties or platforms*. In this new architecture, the greatest control over such an interoperating system will be closest to the user, personally, and to the groups and communities they seek to principally be part of. The nature of these enabling mechanisms would be technical, related to business models in the widest sense, as well as dependent on the appropriate laws, policy and regulation.
3. At the technical level, interoperability in Internet/digital space, and their functionalities, was always the norm.³ One can proceed with a technical approach focused on common technical standards or protocols (all speak the same language) or alternatively on employing APIs (akin to using translators), or a mix of both.
4. Indeed, there are many technical ways to encourage or enable plurality and diversity in the digital information environment. These range from dominant social media allowing third party recommendation engine plug-ins (ARTICLE 19); offering users a choice of client-end application provider (EFF, Doctrow); deploying crowd-sourced curation; using federated servers (Fediverse, Mastodon); to simultaneously allowing a whole range of such possibilities (BlueSky).

Current legislation like the Digital Markets Act in the EU, and the proposed ACCESS ACT in the US, provide a comprehensive legal basis and framework for such interoperability.

5. The knottiest issue is that of business models that can underwrite a plural and diverse digital information environment. It is here that most of the current proposals lose their bearing. Some caveats may therefore be in order. First, while public, community, and philanthropic funding would continue to be needed for diverse and alternative media - and there is a strong case for increasing these - mainstream structural solutions must consider the basic dynamics of the media sector/market. Second, ‘digital value’ often actually consists of data-driven, intelligent, precision/ targeted services (like targeted medicine, education, etc). A sustainable model cannot afford to disregard such

³ Becky Chao & Ross Schulman, Promoting Platform Interoperability, New America, May 20202, available at: <https://www.newamerica.org/oti/reports/promoting-platform-interoperability/interoperability-is-fundamental-to-the-internet/>

potential ‘digital value’. The real challenge is not targeted content and targeted advertisements (people may want them), but where the power of ‘targeting’ lies, and whose interests it serves.

Accordingly:

- a. It is necessary to redistribute revenues within the ecosystem. Since data is a key value, it is also essential – based on some criteria of users having ‘contributed value’ – to redistribute/allocate access to, or interact with, personal and group data. This has of course to be undertaken to the highest privacy and security standards, and to be in the user’s best interests.
 - b. For the above purpose, it is increasingly possible to retain data, and even AI, at the edges, close to the users, and under their control or that of their agents. Service providers can be enabled to interact with such closeted data in ‘Confidential Clean Rooms’⁴, with predefined and transparent parameters, though unable to remove the data, or to harm the users in any way.
 - c. In addition to these systemic approaches, one-off interventions by antitrust regulators to remedy competition harms can stimulate business model’s diversity, including through subsidization of more sustainable digital media alternatives.
6. Diverse interoperating social media models also create ‘circuit-breakers’ that interrupt and check mega-scale foreign or other disinformation campaigns. At the same time, the legitimate rights to access global information, and their possible curtailments by governments using the same circuit-breakers, is an issue that would need to be addressed in other ways.
 7. Certain adverse outcomes may arise from mandated interoperability, and must be addressed appropriately. One is that over-standardization can throttle innovation in these yet early digital times. Sandbox demonstration of innovations, and testing them for the need to update standards, and even standards-free limited play, could be enabled. Poorly-conceived interoperability mandates can also actually increase the power of dominant incumbents, and therefore asymmetric interoperability mandates may be required,⁵ as well as a constant close watch over developing market conditions. A second possible adverse outcome is that interoperability may be used to increase polarization and echo chambers, thus failing to produce more diversity of exposure. This may be addressed through various measures that recognize that exposure diversity results not only simply from autonomous choices, but also from greater visibility of alternative and disadvantaged sources⁶.
 8. A range of possibilities exist for enabling and supporting interoperating digital social media. One country may provide only a legal mandate and some technical standards. Others may add specific public/community structures for supporting interoperability, and perhaps for maintaining data and AI at the edges. Such a digital public infrastructure approach may further extend to providing certified, third-party, ‘Confidential Clean Rooms’ for service providers at various levels of the media value chain to safely interact with users/groups’ data and AI. It may even extend to enabling

⁴ Hrushikesh Mehta, Confidential Clean Rooms in DEPA, iSPRIT, 14 October 2021, available at: <https://pn.ispirit.in/confidential-clean-rooms-in-depa/>

⁵ Louis Denart, Noah Fröhlich, Nicoletta Koch & Giovanni Maggi, Exploring Mandatory Interoperability across Social Media Platforms in the EU, SciencePo Chair Digital, Governance and Sovereignty, April 2023, available at: <https://www.sciencespo.fr/public/chaire-numerique/wp-content/uploads/2023/08/Interoperability1.pdf>

⁶ Natali Helberger, Kari Karppinen & Lucia D’Acunto (2018) Exposure diversity as a design principle for recommender systems, Information, Communication & Society, 21:2, 191-207, DOI: 10.1080/1369118X.2016.1271900

(graduated) asymmetry in interoperability, between big and small players, or even preferential treatment (for instance for maintaining a certain proportion of 'local/community content'), and so on.

Scenario of outcomes:

Should the recommendations above be implemented, a number of scenarios become possible. This variety of outcomes is due to a combination of exogenous and endogenous factors.

In general: On the one hand, laws, regulations, imposed measures and policies will break the immobility of the *status quo* and create the conditions for a variety of actors to enter the space and interoperate. This, in turn, will generate competitive dynamics fueling quality improvements and innovation. Depending on the specific rules and remedies implemented, the scenario of outcomes can take various shapes. On the other hand, thanks to the availability of real alternatives, people will regain some agency and bargaining power to drive the demand side of the market. Here too, the scenario of outcomes can vary, depending on the specific empowerment tools to be implemented, the degree of interoperability achieved, and people's digital literacy, among others.

To be specific we can think of two possible scenarios, which could also co-exist.

1. The first scenario would be of dominant platforms themselves providing plug-ins for diverse third-party recommendation engines. A variety of intermediaries could have access to the platforms and their users, and be able to provide alternative, additional, innovative or better services to the latter. For example, a variety of players could provide recommendation systems, optimized for different outcomes, and thus recommending different content. These players could compete to attract users based on their optimization models, their data protection settings, their transparency, and similar features. The business models adopted by these players could be different, too. In this scenario, users of each social media platform could remain on the same platform where all their relevant contacts are, therefore keep gaining from network effects
2. In the above scenario, the dominant social media platforms retain the all-important interface with the user. A second scenario can be of third-party 'social-media clients' (like email clients – Outlook and Thunderbird) that manages the user interface, at the back-end of which diverse social media can connect. The social media client can also undertake Personal Information Management or data management for the user, and also host a social media AI assistant. All these will be done on the user's behalf and in her interest, as managed by a user-trusted third party (and not the social media service providers).

In both these scenarios, users would have considerable latitude to decide which services they want to use and easily change their providers if unsatisfied; in other words, they can be the masters of their own online experience and build their social media *à la carte*.

This means that; at an individual level, users will have the choice, and more agency in building their information diet. They will be exposed to a variety of content and configure their 'own matrices of truths'. At community level, no player will have the power to influence or manipulate the information flow. The diversity of players and business models will create circuit breakers for many information threats, such as disinformation or propaganda. Media will become less dependent on a single player or business model.

Way forward – Immediate steps needed

We are of the view that to be able to move in the recommended directions of social media interoperability, leading to a diverse and plural media environment, a few immediate steps may need to be taken. These are required to confront the narrative that beating back the dominance of Big Tech social media is impossible, and we better learn to live with it. These proposed steps would help policymakers and the public get a palpable feel of what alternative scenarios of a really rich and diverse media ecology are possible through social media interoperability, and what exactly needs to be done in this regard.

1. Develop a fully working demonstration or sandbox model which shows actual operation of social media interoperability, encapsulating real life use cases.
2. Develop a model law which would enable and support the needed social media interoperability.
2. Develop a complete blueprint of a business plan, along with business actors like start-ups, for revenue distribution among various media players – client-end application providers, curators and distributors, and the original content producers.

The authors of this policy brief are a part of the 'Working Group on Information Integrity, Interoperability and Diverse Media' (WG-I3MD), and have developed this policy brief on behalf of the Working Group. The Working Group plans to produce a full-fledged concept paper based on the above ideas, and also to proceed along the three immediate steps that are listed above.

The list of members of the Working Group on Information Integrity, Interoperability, and Media Diversity (WG-I3MD) is as follows:

1. Seán Ó Siochrú: Seán is a communication rights activist, having played a key role in the communication rights movement. He is with the Nexus Research Cooperative, in Ireland. In the WG, he represents the Global Digital Justice Forum, a global network working on digital justice.
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4. Paulo José Lara: A sociologist, political scientist, and Master in Sociology of Culture at UNICAMP, Brazil, Paulo is Co-Executive Director of Article 19, Brazil and South America.
5. Parminder Jeet Singh: Parminder has been a co-executive Director of India-based NGO IT for Change for nearly two decades. In this WG, he represents the Just Net Coalition, a global coalition working for equity and social justice in a digital society.
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9. Tanya O'Carroll: Tanya co-founded Amnesty International's global technology and human rights program. Tanya now works as an independent advisor, strategist, and leader focused on tech accountability, human rights, and social justice. She also leads an initiative 'People vs Big Tech'.
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15. Prashanth Sugathan: An engineer turned lawyer, Prashanth is the Legal Director of the India-based Software Freedom Law Center. He works closely with the free software community and has been involved in many digital technologies-related litigation.

16. Jamila Venturini: Jamila a co-executive Director of the non-profit Derechos Digitales, where she coordinates the organization's efforts on artificial intelligence and inclusion in Latin America. She is one of the authors of the text "Automated Decisions in public functions in Latin America" (2021),

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