

Code of practice on Disinformation

Summary of the signatories' first reporting – January 2019

Google, Facebook, Twitter, Mozilla and the trade associations representing the online advertising sector (WFA, EACA and IAB Europe) have each submitted a first report setting out the state of play of the measures taken as of December 2018 to comply with commitments under the [Code of Practice on Disinformation](#). The reports reflect the specificities of the services provided, and the scope of the commitments subscribed to, by the Code's signatories.

1-Performance of online platforms

Facebook subscribed to all the commitments of the Code of Practice and overall its report shows that Facebook has taken or is taking measures towards the implementation of virtually all of them. In most cases, these measures apply across the European Union and affect all Facebook users, regardless of their location. Facebook also implements measures to improve the scrutiny of ad placements, ensure the transparency of political advertising, and provide users with contextual information, tools and support to empower them in their online experience. In particular, the political ads transparency tool will be available across the Member States in advance of the EU elections. The report also provides insights on a number of tools to help consumers make decisions when they encounter online news that may be false or to make it easier to find diverse information.

However, some consumer empowerment tools, such as the *Context Button*, or the cooperation with fact-checkers are not yet deployed throughout the EU. More clarity on deployment plans would be welcome. Actions to support research also appear to be of limited scope. With regard to the API for its political ad archive, it remains unclear to what extent access will be available to all relevant research communities. Although Facebook provides some figures on the effects of its global policies, a more detailed breakdown of these data, both at geographic level and in relation to enforcement, would help to better appraise the impact of these policies in the EU and its Member States. Preparation of metrics is still under way and only illustrative data are provided so far.

Google subscribed to all the commitments of the Code of Practice and it has taken or is taking measures towards the implementation of all of them. Policies on misrepresentation and the protection of users from abusive content, including potentially disinformation, apply across all Member States. Google also enforces global policies that allow advertisers to assess media buying strategies and help them monitor the placement of ads. Work is still in progress with regard to Google's political ads tool, which will be rolled out in advance of May 2019 and will include an *Election Ads Transparency Report*. Global policies also help the company ensure the integrity of its services by prohibiting the use of impersonation or misrepresentation techniques. Google has also taken steps to provide users with information, tools and support to empower them in their online experience: Google reports that its ranking algorithms prioritize relevant, authentic and authoritative information in the search results. A *Fact Check label* is available in all EU 28 Member States, which is currently already used by fact-checking organisations in eleven Member States.

However, other tools that may help improve users online experience, such as *Breaking News* and *Top News*, are available only in a small number of Member States; more clarity on future deployment plans is needed. Actions to support research are still of limited scope, mainly focused on the US research community. Although Google provides some data on the results of its policies, a more detailed breakdown of the figures included in the *Annual Bad Ads Report* would help to better appraise the impact of these policies in the EU and its Member States. Google indicates that this initial report will be followed by others that will include more implementation details and metrics. Similarly, more detailed information on the results of its enforcement of policies ensuring the integrity of services would help in assessing their effectiveness.

Twitter has taken or is taking measures towards implementation of most commitments to which it has subscribed. We understand that the measures apply across the EU and affect all Twitter's users regardless of their location.

Twitter has prioritised measures designed to act against malicious actors harnessing the vulnerabilities of its services, in particular the closure of fake or suspicious accounts and automated systems/bots used to spam or increase the distribution of inauthentic content and disinformation. The report provides some illustrative data, which suggests significant progress on this front.

On the other hand, the report does not sufficiently discuss how its advertising policies restrict purveyors of disinformation from promoting their tweets and thus achieving greater visibility. Relatedly, while Twitter now enables users to choose between chronologically-ordered Tweets and "Top Tweets," it is unclear how content is ranked in the timelines of users choosing the latter method. As Twitter has not subscribed to Commitment 8 (on prioritisation of authoritative content), the report does not address this issue. It is therefore difficult to assess the extent to which this presents a shortcoming in Twitter's engagement under the Code. Moreover, the report does not provide any information on features and tools that make it easier for people to find diverse perspectives about topics of public interest (Commitment 9).

Twitter will come up with a monthly monitoring report for January which will include details on Twitter's political advertising transparency initiative, as well as the timing of its roll-out, the scope of disclosure (e.g., targeting criteria), and the duration for which political ads will be kept in archive.

Twitter's engagement with respect to bots focuses on disabling or preventing the registration of malicious automated accounts, rather than labelling automated accounts as such. While its *Tweet Source Label* may provide context, it may not effectively signal to the average user the presence of bot or automated content; it is not clear how, at this stage, its *Partners Page* provides context on this issue.

Mozilla has taken or is taking measures towards the implementation of its commitments under the Code. Mozilla's upgraded Firefox 65 browser will block cross-site tracking by default. This will limit the information revealed about users' browsing activity, which may be harnessed in support of disinformation campaigns. The upgraded browser will be available across the EU. The Firefox EU Election Promo will promote transparency of political advertising. Its availability across the EU will depend inter alia on Mozilla's ability to localise features by Member State.

Mozilla will provide relevant metrics, as appropriate, on the launch of *Firefox 66* and the *Firefox EU Election Promo*. It would be useful for Mozilla to provide further details on the features, availability and timing for the rollout of the *Firefox EU Election Promo*.

Overall, the Commission expects that a more systematic approach will be developed by all signatories to enable the proper monitoring and assessment of their compliance with their commitments under the Code, on the basis of appropriate performance metrics. In the intermediate targeted monitoring phase, to be carried out from January to May 2019, the Commission will pay special attention to the reporting on the implementation of policies and tools that relate to the integrity of electoral processes.

2-Performance of Trade associations

The Commission welcomes the efforts of the trade association signatories from the online advertising sector to raise awareness about the Code and promote its uptake among their respective memberships. The Commission notes that four national associations have now subscribed to the Code.

The Commission notes, however, the absence of corporate signatories and stresses the important role advertisers play in efforts to demonetise purveyors of disinformation. As indicated in the Code of Practice, *“all parties involved in the buying and selling of online advertising and the provision of advertising-related services need to work together to improve transparency across the online advertising ecosystem and thereby to effectively scrutinise, control and limit the placement of advertising on accounts and websites belonging to purveyors of Disinformation”*.

The Commission therefore expects advertisers to step up and commit to the effort to counter disinformation, in particular ahead of the 2019 EU elections. The Commission will remain in contact with the trade association signatories regarding the aggregated reporting they will provide in September 2019.