CODE OF PRACTICE ON DISINFORMATION

INTERMEDIATE TARGETED MONITORING – FEBRUARY REPORTS

The Commission has received Monthly Reports from **Google**, **Facebook** and **Twitter** addressing actions taken during February 2019 towards implementation of commitments under the Code of Practice on Disinformation with particular pertinence to the integrity of elections. These commitments concern: scrutiny of ad placements (Commitment 1); political and issue-based advertising (Commitments 2 to 4); and integrity of services (Commitments 5 & 6).

Broadly, the Commission recognises that the February Reports show significant progress in a number of areas. In particular, the platforms have all confirmed that their respective political ads transparency tools will be operational in advance of the European elections and have provided additional details on these tools. This is a substantial achievement, accomplished is a short time-frame. It should greatly enhance the transparency of online paid political advertisements and help citizens fulfil their role as informed voters in the democratic process. In addition, the platforms have all supplied further information about other election integrity initiatives they are pursuing, some of which go beyond the letter of the specific commitments set out in the Code of Practice. This, too, is encouraging.

In other areas, the picture varies significantly by platform. Google, for example, has supplied detailed metrics demonstrating actions to improve the scrutiny of ad placements as well as insights on how these efforts work to diminish disinformation. Facebook has announced new actions to improve the scrutiny of ad placements, including brand safety tools as well as a new policy concerning ads that include misinformation about vaccines. Twitter, on the other hand, has not reported on specific actions to improve ad scrutiny, nor has it supplied further information on actions taken to protect the integrity of its services against manipulation, e.g. by malicious automated accounts. Despite these differences, further efforts are nevertheless needed by all signatories concerned to identify relevant key performance indicators, which enable tracking progress towards the achievement of the objectives under the Code of Practice.

Google reported on actions taken during February to improve **scrutiny of ad placements** in the EU. These included 20,627 actions against EU-based Google Ads advertiser accounts for violation of the company's policies on misrepresentation and 5,501 actions against such accounts for violation of its policies on insufficient original content. As regards EU-based AdSense publishers, Google took action against one account for violation of the company's policies on misrepresentation and 69 actions against accounts for violation of its policies on valuable inventory. The Commission appreciates that the February Report, like the January Report, provides per-Member State data on these actions. The Commission also appreciates the general insights the Report provides concerning the relevance of the aforementioned policies to the effort to counter disinformation. It notes, for example, that enforcement of the company's policies on insufficient original content (advertisers) and valuable inventory (publishers) prevents driving traffic to or monetising content that provides little or no value to users, and thus protects the Google Ads and AdSense platforms from being used to spread low quality information widely across the web, including in ways associated with disinformation campaigns. The Commission invites Google to probe more deeply into the data it has provided for

more specific insights and lessons learned on the extent to which enforcement of these policies work to de-monetize imposter websites and websites that persistently purvey disinformation.

As regards **political ads transparency,** the February Report provides further detail on Google's election ads transparency policy for the EU, including the specific verification requirements that advertisers must meet to run election ads. Advertisers will be subject to a two-step verification process aimed at verifying advertisers' eligibility to run such ads and their identity. This will require the provision of *inter alia* identity and location documentation as well as attestations that the organisation concerned is based in an EU Member State, and that its representative is a citizen of an EU Member State. The Report confirms that Google will begin enforcing its election ads policy as of 21 March; the verification procedure will be open for application as of 14 March. The Report also confirms that Google's *EU Elections Ads Transparency Report* will be introduced in April; presumably, it will capture all political ads authorised and served under Google's new policy. This ads repository will be downloadable and searchable by means of filters, such as location and advertiser. Google has not reported further progress with respect to the transparency of **issue-based advertising.**

As regards **integrity of services,** the Report indicates that in February YouTube removed over 629,000 channels for violation of its *Spam, Deceptive Practices & Scams Policies* and over 5,000 channels for violation of its *Policy on Impersonation.* These data are global and do not distinguish between types of content. The Report also does not provide any updated information or metrics on certain topics addressed in Google's Baseline Report for year-end 2018, such as abusive account creation, engagement abuse or influence operations.

Facebook reported on actions taken in February to improve the **scrutiny of ad placements** and provided an overview of its ad policy review and enforcement process. It also highlighted a new policy on vaccine misinformation, whereby the company may reject ads that include misinformation about vaccinations. Moreover, the Report describes Facebook's brand safety policies and control mechanisms for advertisers to decide where their ads can appear. For instance, advertisers can block ads from running on specific pages or exclude the delivery of their ads within certain categories of content. Furthermore, after the start of a campaign, advertisers can download a publisher delivery report to see where their ads appeared. The Commission appreciates that Facebook has opted for an approach that gives advertisers information and choices to determine how best to protect their brands; this goes in the direction foreseen in the Code of Practice. The Commission expects to receive information that will enable a quantitative assessment of these brand safety policies.

On **political and issue-based advertising**, Facebook provided further information on its policy for issue ads in the EU, which cover six broad categories of issues: immigration, political values, civil and social rights, security and foreign policy, economy and environmental politics. Facebook also elaborates on its cross-border advertising policy and its political advertising authorization policy. Briefly, Facebook has opted to allow persons to run political advertisements in a Member State only if they have passed an authorization process that will include checking if they are resident there. In the authorization process, a person must submit an ID or two official documents from the targeted country to confirm their identity. In addition, Facebook will use a variety of inputs to check whether ads are coming from an authorized user in the targeted country. These policies will apply to both political adverting and issue-based advertising. Furthermore, Facebook announces the launch of its *Ad Library* for late March. This library will be a publicly searchable database for political and issue-

based ads about elected officials, candidates for public office and issues of national importance, such as education or immigration. The Ad Library will cover all EU Member States and ads will be stored for 7 years. Additionally, Facebook will be opening the political ads library API upon the launch of its Ad Library to enable access for researchers to the data gathered in the library.

With regard to the **integrity of services**, as in its January report, Facebook reports on its actions undertaken to disrupt coordinated inauthentic behaviour ("CIB"), indicating the removal of three CIB networks in the UK, Romania and Moldova. Furthermore, Facebook highlights an update to its recidivism policy for Pages: where a Page or a Group is removed for violation of Facebook's Community Standards, Facebook may also remove other similar Pages or Groups. Facebook did not provide information on specific actions undertaken in February against other breaches of its Community Standards, such as the detection, blocking and removal of fake accounts for misrepresentation or inauthenticity. However, based on their quarterly analysis of actions against fake accounts covering the last quarter of 2018, they indicated that they took down a total of 1.2 billion fake accounts, up from 754 million in the third quarter of 2018.

Twitter did not report on actions in February to improve the **scrutiny of ad placements** or provide any metrics with respect to its commitments in this area. This follows upon Twitter's failure to provide any information with respect to these commitments in its January Report. The Commission recognises that Twitter's platform mainly features advertising on its own site rather than on third-party sites. Nevertheless, it regrets that the company has not reported on pertinent matters, such as efforts to restrict accounts that misrepresent themselves or persistently purvey disinformation from using Twitter's advertising services (promoted Tweets, accounts and trends). The Commission urgently expects Twitter to articulate its intentions in this area and detail relevant activities in its subsequent monthly reporting.

The February Report confirms that Twitter's **political ads transparency** tool will be operational in advance of the European elections. The company has expanded its *Political Campaigning Ads Policy* to cover the EU, initially only with respect to the European Parliament elections. It will begin enforcement of the policy as of 11 March. The policy will include a certification process to ensure that only EU-based individuals and entities can run political campaigning ads, subject to national rules in some Member States prohibiting such ads altogether or imposing other limitations (e.g. black-out dates). Organisations or candidates registered with national electoral authorities must provide proof of registration; organizations not so registered must provide an EU VAT or EU Company identification number, and individuals an EU government-issued photo ID. Once proof of identity is verified, advertisers will receive a letter by post with an access code. The Report confirms that ads taken under its new political ads policy will be viewable in Twitter's *Ad Transparency Centre* (ATC), along with online campaign details such as billing information, ad spend, and impressions data per Tweet as well as targeting data for ads served. The ads will be maintained in the ATC "indefinitely," and will be accessible worldwide, with no Twitter account required. The Commission notes Twitter's progress in this area. However, it has concerns about the research functionalities of the ATC repository, which appear to be limited to simple search queries. As regards **issue-based ads,** Twitter's *Political Content Policy* permits issue advocacy advertising, which include ads that refer to an election or a candidate or that advocate for or against issues of national importance, subject to national restrictions prohibiting such advertising. The Commission welcomes this progress, but considers that

the stated policies in this area are not entirely clear in a number of respects, including the certification requirements (if any) and the inclusion of issue advocacy ads in the ATC repository.

As regards **integrity of services**, Twitter did not report on actions in February to protect its services against manipulation, e.g. from malicious automated accounts, spam, or other activities in violation of the company's terms of services. The Commission regrets this omission and remains concerned by the lack of metrics enabling the measuring of progress in this area.

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The platforms also reported in February on a number of **other initiatives in support of elections integrity**, some of which go beyond the letter of the specific commitments set out in the Code of Practice. The Commission welcomes these initiatives.

Google reported on trainings for journalists on countering disinformation and tools and best practices to strengthen research and reporting; trainings for election professionals on security tools; and continued efforts to support media literacy.

Facebook supplied additional information on its *Elections Operation Centre*, including general information on staffing, expertise, staff training, and threat scenario planning and protocols. It also reported on continued training for electoral stakeholders, such as on safety and security best practices, as well as on a dedicated communication channel for political parties and elected officials. Facebook also noted the extension of its fact-checking network to include Spain; nine EU Member States are now covered.

Twitter reported that it has formed a *Cross-Functional European Elections Team* that will lead the company's work on electoral integrity from now through the elections and will proactively work *inter alia* to identify potential threats from malicious actors. The Commission is encouraged by this initiative, and it would appreciate further information on staffing and resources (e.g. local language coverage), and insights on how the team will monitor trends not only at regional level, but monitor and react to threats at the level of the individual Member States.

Twitter also reported in broad terms on outreach and training activities with EU political parties in Brussels, focusing on safety and security issues, as well as outreach and engagement with public authorities in the Member States on electoral integrity and election interference matters; the Report identifies eight Member States.