



International Panel on the Information Environment

IPIE Submission to the OECD

Draft Recommendation on Information
Integrity

Technical Paper 2024.3



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SUMMARY

This submission by the International Panel on the Information Environment (IPIE) sets out recommendations for the OECD's Draft Recommendation on Information Integrity, and is the IPIE's response to the OECD's public consultation.¹

The IPIE's recommendations are summarized as follows.

- Online information platforms should be required to conduct and publish research, using established and open scientific methods and processes (III(3)(a), p. 5).
- Online information platforms should allow access to independent researchers to conduct and publish research on platform designs, algorithmic recommendation systems, and content moderation procedures, and to ensure equitable access for researchers in the Global South (III(3)(a), p. 5).
- Transparency about algorithm systems, content moderation procedures and enforcement actions (III(3)(a-d)) should be a requirement of regulatory oversight and cooperation between governments (V, p. 5).
- Innovative models for funding independent media, and the established and open scientific methods and processes for validating research on online information platforms, should be promoted (IV(1)(c), p. 7).
- Actions to prevent the spread of disinformation should not be restricted to malicious actors, deceptive actions, or large platforms (IV(3), p. 9).
- Governments and regulators should be encouraged to take enforcement actions against bots and inauthentic accounts found to be spreading disinformation (IV(3), p. 9).
- More stringent industry standards should be encouraged for traceable marks to engender trust in AI-generated content.

¹ <https://www.oecd.org/en/events/public-consultations/2024/11/oecd-draft-recommendation-on-information-integrity.html#:~:text=The%20OECD%20is%20currently%20inviting,freedom%20of%20opinion%20and%20expression>

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INTRODUCTION

This submission provides recommendations to the public consultation on the OECD's Draft Recommendation on Information Integrity. The purpose of the Draft Recommendation "is to provide guidance and promote information integrity in line with the universal human rights of freedom of opinion and expression."² The Draft Recommendation is a welcome and necessary step towards regaining and upholding information integrity in the global information environment.

The IPIE is an independent and global science organization providing scientific knowledge about the health of the world's information environment. Based in Switzerland, the IPIE offers policymakers, industry, and civil society actionable scientific assessments about threats to the information environment, including AI bias, algorithmic manipulation, and disinformation. The IPIE is the only scientific body systematically organizing, evaluating, and elevating research with the broad aim of improving the global information environment. Hundreds of researchers worldwide contribute to the IPIE's activities.

This submission draws on the IPIE's technical reports and expert surveys, especially the Expert Survey of the Global Information Environment 2024 ("Expert Survey 2024") which surveyed 412 researchers from 66 countries about the global information environment.³ The researchers were from the fields of social sciences, humanities, computer science, and related disciplines. While most of the researchers were concentrated in the USA and Western Europe, researchers from

² *ibid.*

³ International Panel on the Information Environment. 2024. *Expert Survey on the Global Information Environment 2024: Searching for Solutions*. SFP2024.1. Zurich, Switzerland: IPIE.

other countries, including Brazil, Chile, China, India, and Nigeria and regions such as Eastern Europe and Sub-Saharan Africa also contributed expert views. The submission also draws on the IPIE's previous policy submissions, notably the submission to the UN Code of Conduct for Information Integrity on Digital Platforms.⁴

The IPIE's Expert Survey 2024 confirmed that the most important features of a healthy information environment are the availability of accurate information; the diversity of voices; and the diversity of media ownership.⁵ The recommendations in this submission are designed to strengthen these features as they pertain to the objectives of the Draft Recommendation: (1) strengthening societal resilience; (2) enhancing transparency, accountability, and plurality of information sources; and (3) upgrading institutional architecture and open government practices.

⁴ International Panel on the Information Environment, *IPIE Submission to the United Nations: UN Code of Conduct for Information Integrity on Digital Platforms*. Technical Paper 2023.1. Zurich, Switzerland: IPIE.

⁵ IPIE (*supra* note 3), p. 5.

IPIE RECOMMENDATIONS

1. Commitment to Information Integrity

The IPIE considers information integrity to be vital for a healthy global information environment. To ensure information integrity, stakeholders should actively make use of scientific evidence and encourage accurate reporting on digital platforms.

The IPIE therefore supports the commitment to “evidence-based public policies in support of information integrity”, “independent research”, and the promotion of “access to accurate, reliable, evidence-based and plural information sources” in the Draft Recommendation recitals (p. 2). The Draft Recommendation corresponds with the IPIE’s Expert Survey 2024, which found that, “Experts are calling for multi-cultural, multi-platform, and multi-disciplinary research.”⁶

The IPIE also recommends that the Draft Recommendation include a commitment by the OECD and signatory member states to work collaboratively and to advocate for initiatives that seek to establish high standards for information integrity globally.

2. Transparency and Researcher Access

The IPIE’s Expert Survey 2024 confirmed that access to data for research on the information environment remains a major challenge.⁷ The IPIE has identified a pressing need for more research from more countries in more languages, which

⁶ *ibid*, p. 2.

⁷ *ibid*, p. 2.

requires greater access to social media data.⁸ There is also a need to lower barriers to access for researchers in the Global South. The IPIE's scientific experts have expressed concerns regarding the lack of access to platform data, making it difficult to study—and draw conclusions about—the information environment.

The IPIE therefore recommends the amendment of the wording concerning enhanced transparency (III(3)(a), p. 5) to *require* online information platforms to conduct and regularly publish research, and to grant independent researchers access to data and systems so they can conduct and publish research on platform design, algorithmic recommendation systems, and content moderation procedures. Online information platforms should also be required to take measures to ensure equitable access to researchers in the Global South. Any content moderation should be independently verifiable by third parties, using the established open scientific methods and processes of peer review and independent verification.

Transparency not only concerns access to platforms' data and systems; it also concerns monitoring and information-gathering by public officials. The IPIE recognizes the importance of providing capacity-building and sufficient resources at the local, national, and international level for public officials (V(7), p. 12).

The IPIE recommends the inclusion of a new subpoint in V(8) (p. 12) under the principles of open government, to provide researcher access to data for the activities set out in V(7). This access is crucial to ensure that public officials have adequate and up-to-date understanding and evidence to inform their decision-making processes, and for appropriate third parties, including researchers, to

⁸ International Panel on the Information Environment, 2023. *Platform Responses to Misinformation: A Meta-Analysis of Data*. SR2023.2. Zurich, Switzerland: IPIE, p. 3.

assess whether governments are able to provide sufficient capacity-building and resources to implement the recommendations in the Draft Recommendation.

3. Enhancing Individuals' Understanding and Skills

The IPIE welcomes the provisions in Chapter III of the Draft Recommendation which are intended to strengthen social resilience by enhancing individuals' understanding and skills in the modern information environment. The IPIE's scientific experts have found that the two most effective means of user empowerment are content labelling and providing corrective information.⁹

The IPIE therefore recommends that the provisions in the Draft Recommendation concerning transparency about algorithmic systems, content moderation procedures, and enforcement actions (III(3)(a-d) be a requirement of regulatory oversight and cooperation between governments (as stipulated in the wording of III(3)p. 5) under section V: Upgrade institutional architecture and open government practices (V, p. 5).

4. Diversity of Voices

The IPIE Expert Survey 2024 concluded that “the availability of accurate information and diversity of voices are the most important feature of a healthy information environment.”¹⁰ The IPIE also found diversity of media ownership to be an essential feature of a healthy information environment.¹¹

The IPIE therefore welcomes the commitment in IV of the Draft Recommendation to promote a plurality of information sources (IV(1), p. 6). The IPIE furthermore recommends substituting “*exploring*” with “*promoting*” innovative models to fund independent media (IV(1)(c), p. 7). This recognizes the central role of digital

⁹ *ibid*, p. 6.

¹⁰ IPIE (*supra* note 3), p. 2.

¹¹ *ibid*, p. 5.

platforms in the changing media ecosystem and will strengthen the diversity of media ownership. The OECD should also consider including language to address hateful content online.

5. Trust and the Spread of Disinformation

The IPIE agrees that preventing the spread of disinformation is essential to achieve the objective of building trust in the information ecosystem. The IPIE therefore recommends that the references to malicious actors with the intention to deceive the public be omitted, as malicious intent and deception are difficult to prove (IV(3), p. 9). The wording should also not be restricted to large platforms, but apply to all actors across the information ecosystem who spread or enable the spread of disinformation that may undermine democratic electoral processes or human rights.

The identification and labelling of bots and inauthentic accounts does not go far enough to mitigate risks (IV(3), p. 9). The IPIE therefore recommends that the Draft Recommendation be amended to encourage governments and regulators to take enforcement and mitigation actions—and where appropriate, impose sanctions—where identification and labelling identifies disinformation that is considered to carry significant risks of harm to the democratic process, to human rights, and to the overall information integrity of the information environment. The wording on risk assessments should be amended accordingly (IV(3)(e), p. 9).

6. Generative AI

The majority of experts who answered the IPIE’s Expert Survey 2024 “expressed significant concern about the potential for generative AI to perpetuate biases [and] amplify harassment” that magnify the problem of misinformation.¹² Sixty-

¹² *ibid*, pp. 2 and 7.

three per cent of the experts believed that “AI-generated videos, voices, images, and text have negatively impacted the global information environment.”¹³

The IPIE therefore supports the recommendation for collaboration with providers and deployers of AI systems to authenticate and clarify provenance of AI generated content (IV(3)(c), p. 9). However, the IPIE recommends strengthening the wording in the second half of the recommended text which refers to the industry standards of traceable marks, not only to use “*available*”, but also “*encourage more stringent*” industry standards. The IPIE also recommends that the reference to “*technical feasibility*” be omitted, as this phrase unnecessarily weakens the force of the provision.

¹³ *ibid*, p. 2.

SOURCES

International Panel on the Information Environment. 2024. *Expert Survey on the Global Information Environment 2024: Searching for Solutions*. SFP2024.1. Zurich, Switzerland: IPIE.

International Panel on the Information Environment, 2023. *Platform Responses to Misinformation: A Meta-Analysis of Data*. SR2023.2. Zurich, Switzerland: IPIE.

International Panel on the Information Environment, *IPIE Submission to the United Nations: UN Code of Conduct for Information Integrity on Digital Platforms*. Technical Paper 2023.1. Zurich, Switzerland: IPIE.

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ABOUT THE IPIE

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