Voluntary Transparency Reporting of Terrorist and Violent Extremist Content (TVEC) Online

Business at OECD Position

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Business firmly supports the need to combat the spread of terrorist and violent extremist content (TVEC) across online platforms and services. Such exploitation not only threatens the safety of the public, but also impedes the benefits that online platforms and the Internet bring to our economies and societies. All stakeholders will need to collaborate to find effective solutions to this global challenge, and we appreciate the OECD’s leadership in facilitating a multi-stakeholder, global dialogue with its TVEC project.

A voluntary transparency framework, which reflects existing practices across business and government and addresses barriers to implementing transparency reporting, can serve as a strong foundation for organizations of diverse size and skills, both within the public and private sectors. In order to be embraced widely, this kind of framework will require a global approach, involving private sector actors – along with government and civil society representatives – from a wide cross-section of regions and countries.

We recognize the importance of this project as a high-priority initiative, led by Australia and New Zealand, to combat online TVEC in response to the Christchurch Call and the G20 Leaders’ statement on preventing Exploitation of the Internet for Terrorism and Violent Extremism Conducive to Terrorism. Business strongly supports the need for voluntary transparency in this area, as well as improved reporting across both industry and government.

In this context, we believe that this project can contribute to providing a level-set on voluntary transparency reporting for TVEC, and we encourage companies of all sizes to be engaged.

Business at OECD believes that the following objectives are fundamental to the OECD TVEC project value and success:

- Establish an OECD evidence base on existing practices in transparency reporting by business and government;
- Identify and eliminate barriers to voluntary transparency reporting for TVEC;
- Ensure that companies of all sizes and skills are engaged and, in addition, that the project fosters further capacity building to address barriers identified; and
- Foster continued multi-stakeholder engagement in addressing this issue.

In this context, we believe that the following issues are critical to the impact of the project. As such, we encourage the OECD CDEP Committee take into account the need to:

- **Adopt an approach that encourages large and small companies to join this voluntary effort:** In the spirit of collective action and a solutions-oriented approach, we propose that all agreed metrics be treated as a single set of recommended reporting categories. The project should avoid deterring participation by start-ups and smaller companies, including by establishing “tiers”. This approach would *de facto* relegate such companies to lower categories or tiers of reporting.

- **Adopt a practical approach and ensure clear metrics:** We are concerned that the project potentially develops an overly broad set of definitions for the purpose of transparency reporting. We urge that the project adopt a practical approach towards a consensus-based agreement delivering a single set of recommendations for transparency reporting related to TVEC.

- **Allow for a flexible approach to report on the breadth of content moderation actions being taken:** The project could be strengthened by recognizing the multitude of actions being taken with respect to content moderation. Recognizing only take-down decisions could lead to misrepresenting and underreporting of the actions being taken. Ensuring
the flexibility of scope will also allow for the fullest spectrum of companies to participate.

- **Allow for a flexible approach to the definition of TVEC allowing platforms the freedom to adopt understandings of “terrorism” which best allow them to address harmful TVEC content.** We believe that platforms should be transparent with their users about their policies relating to TVEC; however, we would encourage allowing for a flexible approach for services to qualitatively explain their approaches.

- **The project should include a discussion around the transparency of government actions.** We recommend that the project also includes discussion of transparency reporting for Member States, including existing practices. While noting that transparency related to government take-down requests is uneven across the globe, transparency by governments – both OECD and non-OECD Member States – is of critical importance.

**Engagement and cooperation going forward:**

*Business at OECD* appreciates that Member company experts have been invited to participate in the TVEC project’s expert group process together with OECD Member Governments and representatives of civil society and the technical community. We would welcome similar representation at the project’s plenary level, which includes only one industry participant. BIAC encourages all expert groups and plenary discussions to actively seek representation from small and medium-sized companies, including those from a wide range of geographies.

Similarly, it is important for this project to have continued frequent engagement with OECD CDEP delegates through the OECD CDEP Committee process, in order to help progress the project in ways that are in line with the project’s objectives.

The TVEC project can be an important tool towards further fostering a digital economy that is safe, secure, inclusive, and respectful of free expression and privacy. We look forward to continuing to work with the OECD to make further progress on this important work.
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