

Public Comment Appendix for  
Policy Advisory Opinion 2022-01  
Case number

Case description

Meta has requested a policy advisory opinion on its approach to COVID-19 **misinformation**, as outlined in the company's [policy](#) on harmful health misinformation.

Meta's request to the Board is available in full, [here](#).

In its request, Meta asks the Board whether it should continue removing content under this policy or whether another, less restrictive, approach would better align **with the company's values and human rights responsibilities**.

Meta informed the Board that its approach to misinformation on its platforms mainly relies on contextualizing potentially false claims and reducing their reach, rather than removing content. Because it is difficult to precisely define what constitutes misinformation across a whole range of topics, removing misinformation at scale risks unjustifiably **interfering with users' expression**. However, the company began adopting a different approach in January 2020, as the widespread impact of COVID-19 started to become apparent. Meta moved towards removing entire categories of misinformation about the pandemic from its **platforms**. Meta states that it did this because "outside health experts told us that misinformation about COVID-19, such as false claims about cures, masking, social distancing, and the transmissibility of the virus, could contribute to the risk of **imminent physical harm**."

Meta's current approach is to remove misinformation that is likely to directly contribute to the risk of imminent physical harm and to label, fact-check and demote misinformation that does not meet the "imminent physical harm" standard. According to Meta, it "remove[s] harmful health misinformation if the following criteria are met: (1) there is a public health emergency; (2) leading global health organizations or local health authorities tell us a particular claim is false; and (3) those organizations or authorities tell us the claim can directly contribute to the risk of imminent physical harm." The Help Center Article Help Center article on COVID-19 provides a list of 80 "distinct false claims" that the company removes because it "directly contributes to a risk of imminent physical harm as assessed by a relevant external expert." These claims include false cures, false information designed to discourage treatment, false prevention information, false information about

availability of or access to health resources or false information about the location or severity of a disease outbreak.

For content that does not fall within these standards for removal, the company relies on [third-party fact checking](#) organizations to review and rate the accuracy of the most viral content. Independent fact checkers review individual pieces of content and can label content “False,” “Altered,” “Partly False,” or “Missing Context.” Content that is labeled “False” or “Altered” is covered by a warning screen, requiring users to click through to view the content. The warning screen also provides links to articles provided by the fact-checker debunking the claim. Content labeled “Partly False” or “Missing Context” has a less intrusive label, which does not obscure the post and does not require clicking through to view the content. This label also provides a link to articles provided by the fact-checker. According to Meta, content rated “False,” “Altered,” or “Partly False” is demoted in users’ feeds, while content rated “Missing Context” is generally not demoted. Meta also states that it employs a temporary emergency reduction measure when “misinformation about a particular crisis spikes on our platforms and our third-party fact-checkers cannot keep up with rating those claims.” In such circumstances, the company says it demotes important and repeatedly fact-checked claims at scale.

Meta states in its request that, in limited circumstances, it may add a label to non-violating content on COVID-19 that directs users to Meta’s COVID-19 Information Center. According to the company, “[t]hese labels do not signal judgement on whether the post is true or false.”

In its request for a policy advisory opinion, Meta points to the changed landscape surrounding COVID-19 as the reason the company seeks the Board’s advice on its current approach. First, according to Meta there was a lack of authoritative guidance at the beginning of the pandemic, which “created an information vacuum that encouraged the spread of rumors, speculation, and misinformation.” Today, people have greater access to information. “While misinformation about COVID-19 continues to exist, data-driven, factually reported information about the pandemic has been published at an astounding rate.” Second, the development of vaccines, therapeutic treatments and the evolution of disease variants, means that COVID-19 is less deadly. Finally, Meta states that “public health authorities are actively evaluating whether COVID-19 has evolved to a less severe state.” Meta recognizes in its request to the Board that the course of the pandemic has and will continue to vary across the world, noting the variation in vaccination rates, health care system capacity and resources, and lower trust in government guidance as contributing to the likely disproportionate affect the disease will have on people in different countries.

Meta's request notes the Board's prior decisions about COVID-19, "[Claimed COVID Cure](#)" and "[COVID lockdowns in Brazil](#)." Meta's response to the Board's policy recommendations in these cases can be found [here](#).

Question posed by Meta to the Board:

Meta presented the following policy options to the Board for its consideration:

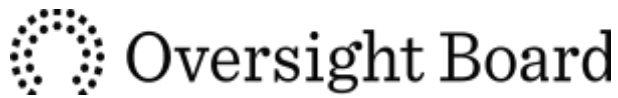
1. Continue removing certain COVID-19 misinformation. This option would **mean continuing with Meta's current approach of removing content that directly contributes to the risk of imminent physical harm.** Meta states that under this option the company would eventually stop removing misinformation when it no longer poses an imminent risk of harm and **requests the Board's guidance on how the company should make this determination.**
2. Temporary emergency reduction measures. Under this option, Meta would stop removing COVID-19 misinformation and instead reduce the distribution of the claims. This would be a temporary measure and the company requests **the Board's guidance as to when it should stop using it if adopted.**
3. Third-party fact checking. Under this option, content currently subject to removal would be sent to independent third-party fact checkers for **evaluation.** Meta notes that **"the number of fact-checkers available to rate content will always be limited. If Meta were to implement this option, fact-checkers would not be able to look at all COVID-19 content on our platforms, and some of it would not be checked for accuracy, demoted, and labeled."**
4. Labels. Under this option, Meta would add labels to content which would not obstruct users from seeing the content but would provide direct links to authoritative information. Meta considers this a temporary measure and **seeks the Board's guidance on what factors the company should consider in deciding to stop using these labels.**

Meta explained to the Board that each of these options has advantages and disadvantages, particularly in terms of scalability, accuracy, and in terms of the amount of content affected. For technical reasons, the company strongly supports taking a global approach, rather than adopting country or region-specific approaches.

While the Board will consider the specific options provided by Meta, the Board's recommendations and Policy Advisory Opinion might not be limited to these options.

The Board requests public comments that address:

1. The prevalence and impact of COVID-19 misinformation in different countries or regions, especially in places where Facebook and Instagram are a primary means of sharing information, and in places where access to health care, including vaccines, is limited.
2. The effectiveness of social media interventions to address COVID-19 misinformation, including how it impacts the spread of misinformation, trust in public health measures and public health outcomes, as well as impacts on freedom of expression, in particular civic discourse and scientific debate.
3. Criteria Meta should apply for lifting temporary misinformation interventions as emergency situations evolve.
4. The use of algorithmic or recommender systems to detect and apply misinformation interventions, and ways of improving the accuracy and transparency of those systems.
5. The fair treatment of users whose expression is impacted by social media **interventions to address health misinformation, including the user's ability to** contest the application of labels, warning screens, or demotion of their content.
6. Principles and best **practice to guide Meta's transparency reporting of its** interventions in response to health misinformation.



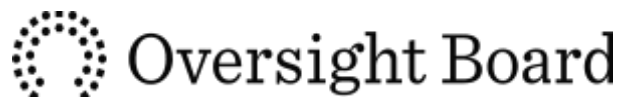
Public Comment Appendix for  
Policy Advisory Opinion 2022-01  
Case number

The Oversight Board is committed to bringing diverse perspectives from third parties into the case review process. To that end, the Oversight Board has established a public comment process.

Public comments respond to case descriptions based on the information provided to the Board by users and Facebook as part of the appeals process. These case descriptions are posted before panels begin deliberation to provide time for public comment. As such, case descriptions reflect neither the Board's assessment of a case, nor the full array of policy issues that a panel might consider to be implicated by each case.

To protect the privacy and security of commenters, comments are only viewed by the Oversight Board and as detailed in the [Operational Privacy Notice](#). All commenters included in this appendix gave consent to the Oversight Board to publish their comments. For commenters who did not consent to attribute their comments publicly, names have been redacted. To withdraw your comment, please email [contact@osbadmin.com](mailto:contact@osbadmin.com).

To reflect the wide range of views on cases, the Oversight Board has included all comments received except those clearly irrelevant, abusive or disrespectful of the human and fundamental rights of any person or group of persons and therefore violating the [Terms for Public Comment](#). Inclusion of a comment in this appendix is not an endorsement by the Oversight Board of the views expressed in the comment. The Oversight Board is committed to transparency and this appendix is meant to accurately reflect the input we received.



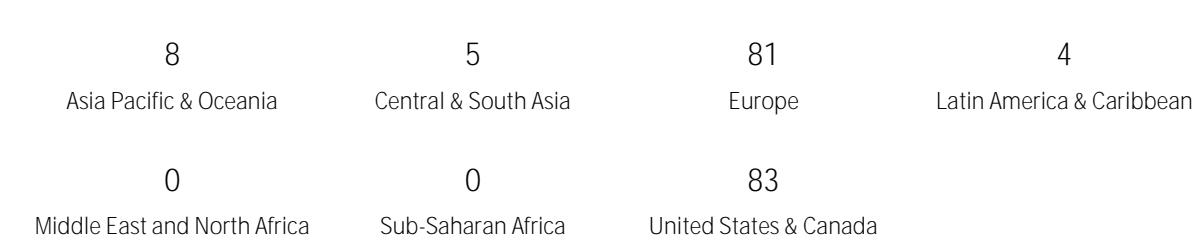
Public Comment Appendix for  
Policy Advisory Opinion 2022-01

Case number

181

Number of Comments

Regional Breakdown



PAO 2022-01

Case number

PC-10453

Public comment number

United States and Canada

Region

Carolyn

Commenter's first name

Thompson

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Covid MisInformation on social media throughout the world should reflect the most current health information.

Full Comment

Covid MisInformation on social media throughout the world should reflect the most current health information available to all countries. This should be from all reliable and acceptable health institutions and research facilities. All specific research should include not only the statistical information and premise but the peer reviewed articles and follow up summaries. And yes, as with all science learning takes place and information may change based on new data and events which should be explained as such BUT there should be no lies, mistruths, conspiracy or political views allowed. It is unprofessional and dangerous to consider any other options.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10457

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Continue to ban misinformation, especially that which is connected to public health.

Full Comment

Misinformation is dangerous and literally leads to harming people. Anti-vax information spreading doesn't just impact the reader, but everyone around the reader, too. It's not just a personal choice. Facebook has no obligation as a platform to allow this content, and it is arguably immoral to allow it in the interest of engagement.

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10458

Public comment number

United States and Canada

Region

Brian

Commenter's first name

Won

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Misinformation should be REMOVED and not allowed to spread.

Full Comment

Misinformation should be REMOVED and not allowed to spread. The allowed continued spread of falsehoods, lies, and outright dishonesty is extremely damaging not only to society but to humanity as a species. Any company considering allowing further misinformation to spread should do a serious look at their moral values and role in furthering the destruction of humanity.

I wish I could say I was being hyperbolic but the behavior of Meta and other corporations the past few years is best described as openly despicable.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10460

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Meta should continue to disallow lies about the efficacy of vaccines and masks. Allowing those lies to propagate on Facebook prolongs the pandemic and kills people. How is this even a question?

Full Comment

Deplatforming misinformation works. Meta should continue to disallow lies about the efficacy of vaccines and masks to propagate on Facebook. This is not an issue of presenting both sides of an opinion and allowing people to make an informed choice; the presentation of lies under the guise of "alternate perspectives" actively hinders people from making informed choices about vaccinations and about masking — and about any issue. Meta cannot shirk the real role it plays in shaping public opinion and affecting the course of public health. It's baffling that Meta would even bring up the idea of not purging lies and disinformation. How did we even get here?

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10461

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Unchecked misinformation on health and healthcare is dangerous and damaging to society at all times, regardless of any current or past emergency status.

Full Comment

Unchecked misinformation on health and medicine is dangerous and damaging to society at all times, regardless of any current or past emergency status. If it is permitted to spread freely during non-emergency periods, pernicious networks of misinformation grow, and members (all of which are being harmed) will be primed for outrage and distrust when perceived censorship arrives during an emergency. There is simply no benefit to anyone, other than perhaps malicious individuals and organizations, in allowing (and even encouraging) the spread of false information of any sort, most certainly including that which encourages misinformed medical decisions.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10463

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Misinformation kills, Meta/Facebook/Instagram should not be profiting off of spreading misinformation about health or vaccines.

Full Comment

The science is extremely sound, vaccines save lives. Anti vaccine misinformation has potentially killed millions worldwide and Meta definitely profited from allowing it to continue for as long as they did. Now they have the nerve to ask if it's okay to go back to allowing it to spread on their platforms simply because people can find actual facts elsewhere even though they know for a fact that there are many people that get the majority of their information from social media and when presented with misinformation often fall for it with terrible consequences. Allowing misinformation to easily spread on Meta's platforms has destabilized countries, led to murders and helped perpetuate genocides and convinced people that they don't need vaccines that would have saved their lives.

This is unacceptable and shameful. We are still in a pandemic that continues to come in waves, giving people the ability to spread misinformation that it's proven leads to death all so Meta can take in more ad revenue is ridiculous to even consider and shows the priorities of the company, profit first, people be damned. Do not allow this to happen and reject their proposal.

Thank you.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10466

Public comment number

United States and Canada

Region

Lisa

Commenter's first name

Majersky

Commenter's last name

English

Commenter's preferred language

None

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Disinformation (LYING) is harmful to humanity. Just cut it out.

Full Comment

I am not interested in extending "freedom of speech" to liars. Many liars are in the game to make money at the expense of human health and survival, or in the interest of their own political power, causing confusion and division among the populace. Facebook's irresponsibility in handling the vital information needed by people in the midst of the Covid outbreak is unforgiveable. Carrying water for the criminal maladministration of the Trump regime put you squarely in the corner with the bad guys.

I daily took time to counter the disinformation being spread. I did this job for free, because I cared about the survival and long term health of people. Facebook quite obviously did not care, despite the wild amount of profit it makes in its endeavors, at our expense.

If Facebook and "Meta" can't straighten up and fly right as global citizens, I have no problem urging my government to ban it, tax it to death, or charge it with crimes. NO PROBLEM AT ALL.

The world did very well before the onslaught of social media and Facebook. We will do even better when it is gone.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10467

Public comment number

United States and Canada

Region

Scott

Commenter's first name

Elliott

Commenter's last name

English

Commenter's preferred language

Scott Elliott

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Be RESPONSIBLE. Stop promoting misinformation. Stop amplifying hate.

Full Comment

Be RESPONSIBLE. Stop promoting misinformation. Stop amplifying hate.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10468

Public comment number

United States and Canada

Region

Jason

Commenter's first name

Shiach

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Misleading health information that exposes people to deadly diseases should have been moderated long before COVID-19 and should continue to be removed wholesale.

Full Comment

Meta/Facebook has never even did not even do the bare minimum to protect users from misinformation and outright falsehoods. The pandemic forced them to implement some protections against people who seek to actively harm the public by lying and omission, and they should continue that.

Meta says it has conflicting values with protecting users and "free speech", but often that speech would not qualify as protected speech. If we tolerate bigotry and lies as free speech it will be used to curtail actual useful information that will help society as a whole.

Meta should not only continue to block anti-vaxx misinformation but should be doing even more to remove white nationalist and extreme religious comments that damage public discourse from the platform.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10469

Public comment number

United States and Canada

Region

Adam

Commenter's first name

Parnes

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Please keep the current policy on COVID misinformation. Removing it will lead to great harm and suffering. Increasing user engagement is not worth the increase in the spread of the disease.

Full Comment

Facebook is a publicly owned enterprise and has the right to allow and ban any content it sees fit. Washing its hands of this responsibility is an explicit tell that it doesn't care what's published on its platform or the consequences. The company had a moral responsibility to ensure its platform doesn't spread misinformation. If the company doesn't feel it's responsible, it should be regulated like a utility and no longer be considered a private enterprise, but a public service.

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10473

Public comment number

United States and Canada

Region

J

Commenter's first name

Lynn

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

More misinformation is not good for anyone

Full Comment

I cannot believe that you are contemplating making Meta/Facebook even more damaging to the world. You need more policing and removal of deliberate misinformation, not less.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10474

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Allowing misinformation on vaccines, masking, etc while still in the midst of at least one pandemic is a shockingly bad idea.

Full Comment

I find it hard to believe that Meta is actively considering allowing dangerous pandemic misinformation back on its platform. It seems akin to asking if one should pour gasoline on a house fire. No. One should not pour accelerants on an out-of-control fire. And, No, Meta should not allow pandemic misinformation on its site. I really cannot believe that this needs to be said.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10475

Public comment number

Asia Pacific and Oceania

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Health misinformation is harmful and damaging regardless of context, as such the policies should remain in place to protect the most vulnerable people in society.

Full Comment

Meta's subsidiaries have materially contributed (and in fact in large part PROMOTED) the dissemination of patently false and misleading information regarding COVID from the outset, this has significantly damaged the ability of various countries to appropriately address what is the largest public-health crisis in a century.

The revelations from various leaks regarding internal policy and the acceleration of misinformation that they caused should make Meta take pause, as frankly to my mind, they are culpable in a large number of ongoing deaths related to COVID and more broadly the anti-vax movement.

We are now seeing an unprecedented rise in the number of cases of formerly near-eliminated diseases, in Australia we have had our first cases of DIPHTHERIA in 30 years, in the US we are seeing the first cases of POLIO in a decade (even longer if you consider that the most recent case was not locally acquired), now is NOT the time to water down policies relating to this type of content because it WILL cause more unnecessary deaths.

"Mother" groups on Facebook are a complete cesspit of false information regarding Vaccines and this has likely significantly increased we are seeing in the anti-vaccine movement.

Regardless of the declarations that "the pandemic is over" we are still seeing thousands upon thousands of daily cases of COVID worldwide, and where those people have not been vaccinated they are likely to have much worse medical

outcomes, so whilst it may no longer be declared as a pandemic it is still infecting people at "pandemic-level" numbers.

To consider rolling back these protections is frankly, disgusting to me, and Meta (and their subsidiaries) should be ashamed of their part in advancing the negative consequences of the pandemic.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10477

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

It is absolutely ridiculous that Facebook is even considering letting COVID, vaccination, and general public health misinformation run rampant on their platform at a time when COVID is still widespread and infection rates are even increasing. It's obvious that Facebook is motivated by profit at the cost of public health and human lives. Even if infection rates approach zero, there is absolutely no good reason why public health misinformation should be allowed to proliferate on Facebook's platform.

Full Comment

It is absolutely ridiculous that Facebook is even considering letting COVID, vaccination, and general public health misinformation run rampant on their platform at a time when COVID is still widespread and infection rates are even increasing. It's obvious that Facebook is motivated by profit at the cost of public health and human lives. Even if infection rates approach zero, there is absolutely no good reason why public health misinformation should be allowed to proliferate on Facebook's platform.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10478

Public comment number

United States and Canada

Region

Matthew

Commenter's first name

Hill

Commenter's last name

English

Commenter's preferred language

N/A

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Misinformation is never OK.

Full Comment

Spreading misinformation and lies wasn't "not OK" just because there was (or is, depending on your politics) a pandemic going on--it's never OK, under any circumstances. Facebook has a moral duty to prevent provably false and deliberately destructive misinformation from spreading.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10479

Public comment number

United States and Canada

Region

Timothy

Commenter's first name

Rabatsky

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Free speech is not "Free" when it causes the loss of life and spreads lies that harm families and society for generations.

Full Comment

Why is an equal voice given to people who's only goal is to harm others? Facebook is a valuable resource that should never be polluted with blatant lies and utter falsehoods. We need common ground to be able to communicate our ideas to others. By promoting that the world is flat, man never walked on the moon or eating cow dung saves you from Covid you take away that common ground. When discussing a pandemic it is really utterly important that there is a set of facts from which people can rely upon to make their own decisions. When you toss aside basic facts with utter falsehoods the common ground is removed and no true discussion can take place. For Facebook to remain a valuable asset then basic facts must be presented, guarded and preserved. To question a basic fact you must have sound reasoning with proof and not pull words out of your behind. What we do with those facts is what a community can talk about and individuals decide upon.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10482

Public comment number

Europe

Region

Reginald

Commenter's first name

Eng

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

That this is even being considered is baffling.

Full Comment

Fake news is fake news. The only reason I can see Meta wanting to reinstate a policy that is harmful to individuals is profit. The dangers of allowing misinformation to spread is widely known and this idea of reversing one of the only good policies this company has made in years is simply unacceptable. Fake news and misinformation has been the single biggest cause of democratic countries ripping themselves in half and now Meta wants to encourage this behavior. Simply unfathomable. I am entirely against what Meta is proposing.

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10483

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Meta is "wondering" if they can restart making money off of misery by allowing health and vaccination disinformation to once again circulate freely on their platforms: Hundreds of thousands died thanks to Meta's laxist policies before Meta at last calculated that the backlash was hurting them & began removing the more outrageous lies.

NO! Meta has to keep the cesspit of anti-vaxers CLOSED!

Full Comment

Meta has been shown to prefer "engagement", meaning rage and extremist positions over truth and the public good because it makes them more money. Now, with over a million dead due to Covid in the USA alone Meta wants to unashamedly go back to preferring \$\$\$ over what is good for society. The only right answer to that question for an entity like Meta that has been complicit in so many deaths is NEVER!

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10487

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

I have no Idea why you would want to change your policy on misinformation?  
For the good of the wolrd and society at large you should try everything to stop this  
and educate society rather than alowing the propergation of lies and untruths  
The only reason that you would want to do this is for profit over the good of society!.

Full Comment

I have no Idea why you would want to change your policy on misinformation?  
For the good of the wolrd and society at large you should try everything to stop this  
and educate society rather than alowing the propergation of lies and untruths  
The only reason that you would want to do this is for profit over the good of society!

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10488

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Free speech protections do not permit people to stand in the public square and falsely shout fire when it causes a stampede that can be reasonably expected to result in harm to people or property. Facebook—as owner of the public forum—is complicit when it actively invites people whom it knows will conduct themselves in this manner.

Full Comment

**Shouting fire when there is no fire is not equal to asserting an opinion; it's intentionally and knowingly false. Facebook's entire moderation policy is built on the dubious premise that there is no such thing as a fact—that everything is an opinion—and as such Facebook acts as though free speech protections always apply. This is conspicuously and demonstrably absurd and one hopes no additional ink need be spent justifying the degree to which Facebook's policy is hilariously wrong and self-serving. Facebook attempts to claim that as the owner of the forum it must protect the right of a person to shout fire in a crowded place. Just as one could not reasonably "label" falsehood in the context of a stampede in a crowded forum caused by somebody yelling fire, so too can Facebook not reasonably claim its labels stop the spread of misinformation to people intent on consuming it. We know labels don't work. We know that promoting truth while still allowing the spread of lies does not work. Facebook itself has proven the degree to which these approaches don't work. Facebook now asks the Board to bless its return to approaches it knows doesn't work. This is utterly nonsensical and in complete opposition to the public good. Facebook has the moral, ethical and legal obligation to protect its users from the harm that would be caused by the speakers it invites to its platform. If Facebook hears its speakers shout fire it must clamp its hand over those speakers' mouths or**

be deemed complicit in the predictably tragic outcome. COVID-19 is not the **problem**. Facebook's **abdication of responsibility to prevent the spread of** falsehoods more generally is causing the destruction of democracy. Free speech protections exist to promote the spread of ideas and opinions; it provides no **protection to spread untruths**. As such Facebook's **moderation policy must be to** remove untruths regardless of the topic and such actions should not be temporary or otherwise conditioned on the existence of an emergency declaration; removal of falsehoods should be perpetual, permanent and subject matter-independent. The **Oversight Board does not exist to protect Facebook's profitability**. When Facebook seeks a more permissive moderation policy to improve its own business prospects the Board is not obligated to consider such a request on its merits. Moreover there is **no merit to Facebook's request**—merely demerits. This Board must make clear Facebook's obligations to **protect democracy from its own willful negligence**, inaction and wrong action.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10489

Public comment number

United States and Canada

Region

Timothy

Commenter's first name

Tai

Commenter's last name

English

Commenter's preferred language

Self

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Vaccine disinformation kills. Please continue to remove it.

Full Comment

Please choose option 1 to check continue removal of vaccine disinformation.

Not for COVID-19, but for the next pandemic.

The next virus or bacteria to rip through civilization may be much deadlier.

Now is not the time to relax our vigilance against disease.

If we allow vaccines to be widely distrusted by the good portion of the public who rely on Facebook for their information and news, voters and therefore politicians will allow our public health system to effectively shrink again, vaccines may be even more widely resisted by the public and so forth.

Facebook just wants to reduce its costs for even more profits, but it has to realize that its ability to sensationalize misinformation comes at great cost to society. It needs to spend even more resources to reduce, or even better eliminate the great harm that its sensationalist recommendation algorithm causes.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10490

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

The value of Facebook as a public forum is proportional to the degree that conversation is based in fact and reality. As misinformation rises, the value of Facebook diminishes. Therefore, measures to combat misinformation in a variety of subject areas should be maintained and made permanent.

Full Comment

Frankly, I don't understand why this is even a question. OF COURSE Facebook/Meta should be implementing measures to block and/or minimize the spread of misinformation. Misinformation, conspiracies, et al are one of the great plagues in society today. Not just regarding COVID, but around so many subjects.

While the public square function of Facebook can be valuable, it's value is in relation to the degree to which these conversations are based in reality and facts. Once these conversations skew into fantasy and falsehood, there is no longer a public benefit, but an active corrosion of the public fabric that results. We have all seen this. It is exacerbated by the fact that economic interests lead many to deliberately foment misinformation for financial gain.

As such, measures against the spread of misinformation should in fact be permanent and the subject matter they cover should be expanded into other areas beyond COVID, such as health more broadly, climate change, energy, economics, and international conflict.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10491

Public comment number

United States and Canada

Region

Peyton

Commenter's first name

Chichester

Commenter's last name

English

Commenter's preferred language

n/a

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

You should not permit medical misinformation under any circumstances. While there can be debates on some issues, the efficacy of vaccines and social distancing are incontrovertible. Such statements do not constitute protected speech. The Supreme Court has long supported the notion that freedom of expression does not allow one to cry "fire" in a crowded theater. Where the sole purpose and impact of speech is to cause harm, it can and should be suppressed. Due to the false claims about vaccines, thousands have contributed to the wave of deaths in the most recent surges of COVID. These people might still be alive today (and many would still be META customers) if they hadn't foolishly heeded the calls to skip vaccination.

Full Comment

You should not permit medical misinformation under any circumstances. While there can be debates on some issues, the efficacy of vaccines and social distancing are incontrovertible. Such statements do not constitute protected speech. The Supreme Court has long supported the notion that freedom of expression does not allow one to cry "fire" in a crowded theater. Where the sole purpose and impact of speech is to cause harm, it can and should be suppressed. Due to the false claims about vaccines, thousands have contributed to the wave of deaths in the most recent surges of COVID. These people might still be alive today (and many would still be META customers) if they hadn't foolishly heeded the calls to skip vaccination.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10494

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Please do not allow the return of Snake-Oil sales. It hurts everyone but the Grifters.

Full Comment

Keep the restrictions on medical misinformation intact, it cuts down on the dishonest peddlers of fake 'health' items that have been shown consistently to be at best useless, and often actually dangerous.

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10495

Public comment number

United States and Canada

Region

Tony

Commenter's first name

Pham

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Abstracted simply, social media platforms such as Meta are amplifiers. Information (true/false) can propagate at inordinate speed in comparison to standard media. Coupled with the relative source anonymity, false information thrive and have long durability without the corrective action along the amplification/escalation pathways that are associated with standard media.

Full Comment

Abstracted simply, social media platforms such as Meta are amplifiers. Information (true/false) can propagate at inordinate speed in comparison to standard media. Coupled with the relative source anonymity, false information thrive and have long durability without the corrective action along the amplification/escalation pathways that are associated with standard media. A suggested solution is to apply a structured filtering/corrective gatekeeping along the amplification pathways to mitigate false information.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10496

Public comment number

United States and Canada

Region

Karl

Commenter's first name

Parkinson

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Q: When is it okay to go back to profiting off the spread of medical misinformation?

A: Never.

Full Comment

Q: When is it okay to go back to profiting off the spread of medical misinformation?

A: Never.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10499

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Try not to be evil.

Full Comment

Rampant unchecked misinformation is rapidly leading to the destruction of our democracy and society.

Any plan to let lies and misinformation 'be o.k.' on your platform is harmful and should not be allowed.

Too many people/groups are knowingly and unknowingly using lies and misinformation to manipulate people to their desired ends.

They spout things that if they were to be true would bolster their case. But in many cases these 'facts' are not really true. Too many are ready to believe whatever matches their per-conceived biases regardless of the actual truth.

Everyone should be entitled to their opinions, not their own 'alternate facts'.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10500

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

I am strongly in favor of continuing to limit the spread of misinformation on Facebook, particularly on matters of public health.

Full Comment

Meta has a vast, singular capability to spread information within society. Because of this unique position, I believe that Meta has a moral duty to tend its effect on our lives with care and responsibility, and to contribute to, rather than degrade, the wellness of humankind.

In this spirit, I think it would be a mistake to relax policies preventing the spread of public health misinformation.

Meta has the power to save lives or destroy them, and must do what is right.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10502

Public comment number

United States and Canada

Region

Richard

Commenter's first name

Johnson

Commenter's last name

English

Commenter's preferred language

A life insurance company

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Current misinformation policy should, at a minimum, remain active. Proposed measure of third-party fact checking labels on posts in categories beyond the pre-defined 80 should be enacted in addition to existing measures.

Full Comment

Current misinformation policy should, at a minimum, remain active. Proposed measure of third-party fact checking labels on posts in categories beyond the pre-defined 80 should be enacted in addition to existing measures.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10509

Public comment number

United States and Canada

Region

Mark

Commenter's first name

White

Commenter's last name

English

Commenter's preferred language

self

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Covid-19 has killed over a million Americans, and in the last week, 423 Americans have died. It is unethical to mislead Americans that covid is not a threat.

[https://www.washingtonpost.com/graphics/2020/national/coronavirus-us-cases-deaths/?itid=sn\\_coronavirus\\_1/&state=US](https://www.washingtonpost.com/graphics/2020/national/coronavirus-us-cases-deaths/?itid=sn_coronavirus_1/&state=US)

Full Comment

Covid-19 has killed over a million Americans, and in the last week, 423 Americans have died. It is unethical to mislead Americans that covid is not a threat.

[https://www.washingtonpost.com/graphics/2020/national/coronavirus-us-cases-deaths/?itid=sn\\_coronavirus\\_1/&state=US](https://www.washingtonpost.com/graphics/2020/national/coronavirus-us-cases-deaths/?itid=sn_coronavirus_1/&state=US)

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10512

Public comment number

United States and Canada

Region

Gary

Commenter's first name

Kirkpatrick

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

The preponderance of medical evidence should always guide what misinformation is allowed on FB

Full Comment

It is patently clear that FB is a public shared resource. Therefore, any misinformation on FB can be amplified by BOTS and whacko users. This puts an extreme burden on FB and META to kill off any miss information which is harmful to the general public. The anti-vax movement is one of those terrible things which FB has allowed to blossom. ENOUGH. If you folks do not fix this quickly congress will step in and really screw things up. Start using SCIENCE to guide your decisions. It will make your job a hell of lot easier.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10519

Public comment number

Latin America and Caribbean

Region

Saiph

Commenter's first name

Savage

Commenter's last name

English

Commenter's preferred language

Northeastern University & Universidad  
Nacional Autonoma de México (UNAM)

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Indigenous communities have expressed themselves differently about best practices to treat COVID-19 due to their religious beliefs. The strict moderation has resulted in several indigenous voices being silenced and their content also demonetized. This type of moderation is affecting indigenous creators and their expression. Now that we are NOT in a state of emergency it is important to be more culturally aware towards these communities and give them freedom to express their religious beliefs. Currently the livelihood of these indigenous communities is being affected due to the strict moderation. The strict moderation is also creating data voids that can be weaponized by bad actors.

Full Comment

Indigenous communities have expressed themselves differently about best practices to treat COVID-19 due to their religious beliefs. The strict moderation has resulted in several indigenous voices being silenced and their content also demonetized. This type of moderation is affecting indigenous creators and their expression. Now that we are NOT in a state of emergency it is important to be more culturally aware towards these communities and give them freedom to express their religious beliefs. Currently the livelihood of these indigenous communities is being affected due to their content being removed and demoted. The audiences of these communities are left with data voids and nobody to provide them with support. I think it can be important now that we are not in a state of emergency to be more flexible towards these communities and allow them to publish their content more freely.



I recently did a research paper on data voids on social media, and how they can especially affect the information ecosystem of underrepresented communities, such as those from indigenous communities. The strict moderation is creating more data voids in these communities, which can then be weaponized by political trolls for nefarious purposes. Giving more freedom and flexibility to these indigenous communities can be important for people's livelihood and also allow a more rich information ecosystem.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10527

Public comment number

United States and Canada

Region

Adam

Commenter's first name

Schiff

Commenter's last name

English

Commenter's preferred language

House of Representatives

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

We write to you today to express serious concerns regarding Meta's June 2022 Policy Advisory Opinion Request on the removal of Covid-19 misinformation from its platforms. While public health experts and scientists around the globe have made major strides in understanding, combatting, and building resiliency against Covid-19, the virus continues to pose a grave public health threat. Any action to roll back the existing – and notably limited – guardrails that protect Facebook and other Meta users from mis-and-disinformation related to Covid-19 would have immense public health consequences.

Full Comment

Dear Members of the Oversight Board: We write to you today to express serious **concerns regarding Meta's June 2022 Policy Advisory Opinion Request on the removal of Covid-19 misinformation from its platforms.** While public health experts and scientists around the globe have made major strides in understanding, combatting, and building resiliency against Covid-19, the virus continues to pose a grave public health threat. Any action to roll back the existing – and notably limited – guardrails that protect Facebook and other Meta users from mis-and-disinformation related to Covid-19 would have immense public health consequences. We strongly urge the Oversight Board to recommend that Meta continue or strengthen their current health misinformation policy to ensure the **health and safety of the platform's users. Despite the scientific and public health communities' relentless efforts to contain and combat the virus,** Covid-19 continues to pose a significant risk to the health and safety of the global population. Thousands of infected individuals around the world are still losing their lives each

day, with recent data showing a 24 percent increase in Covid-19 deaths over the past 14 days.<sup>1</sup> Further, the spread of new, highly contagious variants will continue to challenge our current understanding of effective public health safety measures. As the virus continues to evolve and spread anew, it is critical that the public have access to the latest, scientifically based public health guidelines and recommendations that address new and emerging variants – and actively combat misinformation that can cost lives. As we all know, the health community has been battling misinformation and disinformation long before the Covid-19 pandemic. We have shared these concerns for years, and Facebook has been contacted by our offices over the course of several years regarding anti-vaccine disinformation campaigns on their platform, and widespread Covid-19 misinformation. Although we appreciated their actions to combat Covid-19 misinformation and disinformation throughout the past two years, Meta has not done enough to combat the false, and potentially harmful, information on Facebook. With the virus still enduring, now is not the time to move backwards on life-saving policies. Reversing disinformation policies during a continued public health emergency would also be irresponsible, as Meta is aware of the harm that can spread on its platform. Meta has taken important steps in the past two years to combat the spread of Covid-19 disinformation on Facebook and repealing their policies would allow these bad-faith actors to return. The Center for Countering Digital Hate released a report in 2021, finding that up to 65 percent of anti-vaccine content on social media originates from just 12 individuals – **the so called, “disinformation dozen.”** **On the same day** the report was published, internal Facebook research confirmed that “this is a head-heavy problem with a relatively few number of actors creating a large percentage of **the content growth.**” **In response to this report, Meta stated that “any amount of** COVID-19 vaccine misinformation that violates our policies is too much by our standards — and we have removed over three dozen pages, groups and Facebook or Instagram accounts linked to these 12 people, including at least one linked to each of the 12 people, **for violating our policies.”** However, **to date members of the** disinformation dozen continue to reach millions of followers on Facebook and Instagram. The real-world implications of online vaccine information are clear, with a recent survey finding that a majority of health care workers cite vaccine **misinformation as, “the single most important factor influencing unvaccinated patients’ decision not to get the COVID-19 vaccine.”** By reversing their disinformation policies, Meta would be allowing these and other individuals with harmful intent to return to the platform and once again spread false information. As **Meta noted in their filing, they are seeking this ruling as “many, though not all, countries around the world seek a return to more normal life.”** That return to a more normal life should not lead to a return, or worse escalation, of health mis-and-dis information, particularly at a time when monkeypox is emerging as a global threat that some online users have been quick to exploit with disinformation. Surely after the last two years, we can all agree on that basic principle. Combatting the

Covid-19 pandemic will require continued effort and attention from all those involved, including social media platforms and most prominently Meta. We urge the Facebook Oversight Board to consider the stakes involved in this case, as the spread of Covid-19 misinformation and disinformation can impact the spread and intensity of the virus. We must all continue to do our part to protect each other from this continued deadly pandemic and learn the right lessons from the last two years. We appreciate your time and attention. Sincerely,

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Adam B. Schiff, Member of Congress  
Lori Trahan, Member of Congress

Link to Attachment

[PC-10527](#)

PAO 2022-01

Case number

PC-10653

Public comment number

United States and Canada

Region

Tracey

Commenter's first name

Frerichs-woytuck

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

We need more regulation. Ban ALL medical advice on Facebook!

Full Comment

People are dying Facebook. A few years ago it was black salve, now it's ivermectin. Disallow ANY medical advice on your platform, period! The time will come when Facebook will be found liable-act now to protect your own interests!

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10654

Public comment number

United States and Canada

Region

Savannah

Commenter's first name

Herland

Commenter's last name

English

Commenter's preferred language

Shots Heard

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

The Passionate Ramblings of a Disheartened Public Health Nurse

Full Comment

I have been deeply disappointed by Meta's lack of appropriate action in terms of preventing the spread of misinformation on its platforms. Meta has been on it's heels, scrabbling to put together some disjointed action in preventing misinformation's spread since day one of a global pandemic. But failure to prevent the spread of dangerous ideology was not new to Meta. Anti-vaccine groups DOMINATE this space and put public health in grave danger and have since the early 2010's.

Misinformation and disinformation kill. As a public health nurse, I watched thousands deny COVID and then refuse a life saving vaccine solely because of information that was shared on one of Meta's platform. I think Meta is extremely culpable in thousands if not hundreds of thousands of American lives lost to COVID-19 disease. You leave nurses like me to clean up your mess. I barely make enough to cover student loads and rent, but I am the one responsible for conquering the mountains of disinformation you dump into my community.

Those who spread misinformation continue to profit. They find simple work arounds like posting to a private Facebook group or replacing letters in the word "vaccine" with stars like "va\*\*ine." In choosing to see misinformation as a "free speech" issue, we have allowed public health to be a matter of opinion, erasing the factual strength of the scientific community. Science educators have stepped up to the challenge, trying to add content of virtue and value in this field, but they are jumping in the race MILES behind antivaxxers whose networks were established years ago and never have been attempted to be interrupted by those with the power to do so.

I deactivated my Facebook account because I could no longer stand the hatred and misinformation being spread while I actively work to save lives. I have learned that meta has allowed violence to surge internationally by not having enough speakers of languages other than English to moderate hate speech. Genocide has been committed after information was posted on meta platforms. The world is a less safe place for minorities and for scientists directly because of Meta.

The cost of lives is too high, but as long as profits flow, it seems that Meta has no interest in doing what is right. Massive investment into content moderation will be necessary to prevent these platforms from being used for and by evil. I beg that someone with a heart and conscience would be allowed into this space. Put people over profit. In dying from COVID, your body no longer is able to oxygenate in tissues, and respiratory distress leaves one gulping for breath. Meta is the virus. You are choking out science and disinformation distress will be our cause of death. Please do better.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10656

Public comment number

United States and Canada

Region

Sharon

Commenter's first name

Boyd

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Allowing any misinformation or false information regarding COVID or other health issues endangers the lives of people that rely on the internet for news and health updates. I personally have friends that have spent days in ICU or in strict COVID wards. Luckily none have died so far. It may be a milder condition for some but not for all. Most that are very ill are older but not all. Some have other conditions that affect their immune system. Once you are the victim of a severe COVID, you want others to be safe.

Full Comment

Allowing any misinformation or false information regarding COVID or other health issues endangers the lives of people that rely on the internet for news and health updates. I personally have friends that have spent days in ICU or in strict COVID wards. Luckily none have died so far. It may be a milder condition for some but not for all. Most that are very ill are older but not all. Some have other conditions that affect their immune system. Once you are the victim of a severe COVID, you want others to be safe.

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10657

Public comment number

United States and Canada

Region

Bonnie

Commenter's first name

Walker

Commenter's last name

English

Commenter's preferred language

ShotsHeard

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

The effect of Mis/Dis- information in social media on delivery of Healthcare

Full Comment

In the past 25 plus years the vaccination of children against disease has dropped steadily well below the 95% goal for most vaccines, thus increasing the likelihood of these disease becoming a national health issue. Often this is related to vaccine hesitancy or refusal due to mis/disinformation spread rapidly throughout the community via social media. We in healthcare often jokingly state that "if you saw it on Facebook, it MUST be right". It would be great if that was actually true with regards to healthcare/vaccination issues. Social Media could be a great asset to promoting things that improve the quality of life and health in the US.

The overarching goal of anti-vaxers seems not to primarily be the "well being of children" but a need to gain notariety and be elevated within society. They can make money off their fear mongering by having others pay them for ad space in their pages. These individuals when confronted with the science and substantiated fact, that refutes their claims, then resort to violent speech and denigration of the individual and/or their livelihood in an attempt to silence them. When the medical field stands up to them or the individual does they resort to claims of persecution by the Medical field which serves to support their conspiracy claims that they "are right because the scientific field is trying to shut them up". Shots Heard Round the World and other Healthcare providers have been very instrumental in conveying that the substantiated truth of vaccines is out there and that the scientific and research data overwhelmingly supports the truth that vaccines are not harmful for the vast majority of the population. They prevent more serious diseases and related complications than they cause any type of harm.

In the current atmosphere in American society the opportunity to stir up divisive situations, separate those willing to listen to antiestablishment dialogues and create a loud disturbance is a source for spreading hate and anger that continues to separate children from recommended healthcare, instills anxiety and distrust in parents with regard to their healthcare providers and distances children, unable to make these critical decisions themselves, from methods proven historically to protect them from devastating illnesses.

We as a community need to stand up for the right to free speech however the issue with social media is that instead of being able to immediately refute what is being put forth through specialized groups that target Mothers and parents, we find out that it has been disseminated only after it has done the damage. This methodology creates fear and distrust surrounding the Healthcare systems chosen to tend to the very children at the core of the issue. If it was an individual standing on a soap box on the street we could immediately refute their comments and also be seen as providing an immediate rebuttal and rebuking the fictitious claims made by these people. This then diminishes their standing, deflates the fear they are seeking to create and causes the crowd to walk away from them on their own. Instead when we attempt to comment on these posts with fact we are attacked both professionally and personally causing irreparable damage to our businesses and selves. This gestapo type behavior has to be stopped and free speech has to be respected by all parties involved or the topic heavily censored/shut down due to the nature of the responses.

I believe that Meta's monitoring of blatantly false, misleading and disinformation has done a greater service than they realize. It has demonstrated to these individuals that attempts to stoke the fear and anxiety to gain followers will not be tolerated, especially using intentionally inaccurate information. It is much like yelling FIRE in a group of people, some will panic without fact, some will disbelieve without fact, some stand frozen not knowing which way to turn until they are lead or directed and others will search out the truth in order to react appropriately. If the individual is found to be wrong they are immediately dealt with and someone will rise to the leadership position and quell the fears, calm the masses and life will go on. Meta has been that leader who calms the waters by removing the one who is yelling untruths and preventing mass panic.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10658

Public comment number

United States and Canada

Region

Amy

Commenter's first name

Olson

Commenter's last name

English

Commenter's preferred language

This Is Our Shot

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

I have seen both personally and professionally the damage that misinformation on Facebook has done to individuals, communities and churches specifically related to the covid -19 pandemic. The principal of immediate harm is difficult to measure, as the level of influence that some posts and people on facebook have varies, and an individually may be more or less influenced by a post than someone else.

Full Comment

The Covid-19 pandemic brought to light the challenges and influences of social media more than I have ever seen. Prior to COVID-19, I knew of misinformation about vaccinations floating around online, as I had worked as a pediatric RN for over 14 years (both in North America and in Africa) and had seen people using misinformation about vaccination and anti-vaccination from facebook for a number of years. However, this misinformation is not limited to facebook - it is everywhere on an unregulated internet. Facebook has the unique advantage though of being able to regulate its content more than the open internet. We have been challenged the last two years though, with determining "what is truth?" and "what is misinformation?" I have seen it within my own family, and within my own workplace. Medical professionals are not immune to it. It is a tricky question to know what facebook/Meta should do about it - as I just read the policy brief on the existing policy and am a bit stumped. How do you determine what is an imminent threat to the public? If someone watches a video about the possible benefits of hydroxychloroquine, does it mean they are going to go out and source some immediately, and possibly overdose or have unintended side effects? I have seen this in my own family - my parents were subject to misinformation online, so it is personal. When they came down with covid, not only did they refuse to tell me, but

they risked their health by not seeing a doctor, and using "homemade" brews of hydroxychloroquine and Ivermectin (not even getting the pharmaceutical brands). This made them even sicker. All because of a friend who had found a recipe for hydroxychloroquine through a facebook group. I tell this story so that we understand the perils of online misinformation. The risks it holds are difficult to measure. I know that perhaps rather than removing information, algorithms may instead be developed to promote evidence-based, widely accepted medically correct information, and "downgrade" the algorithms of other information. Perhaps make it so that it cannot be shared? Or so that people cannot comment on it or like it? Does facebook have medical professionals who can moderate these posts and screen for health misinformation? Does facebook have a way to remind people that facebook is not a place to find medical information, or even news information, as you need to "check the source"?

I attempted to use my facebook account during the pandemic to promote true health information. I felt the strong need to promote correct information, when I was being inundated with misinformation. And I was seeing it in all of my friend groups, social connections, church groups. So, I did what I could, as a medical professional, in pointing people to the sources that were medical accurate. However for this I was brutally attacked by friends. They accused me of killing children through vaccination, and they accused me (and my colleagues) of killing people in the hospital with the trials that were being done. They accused me of being part of the coverup by the government and pharmaceutical companies. So what was I to do? I posted as much as I could, and then when it became too distressing I stopped and closed my account for a period. I have not yet reopened it. Some of my friendships have been permanently altered due to the comments that people sent me on facebook. I am not saying this is facebook's fault - just giving an example of how facebook can be used for evil, and not good, even when attempting to use it for good. I hope that facebook can understand the damage that has been done through the platform, and I believe the large number of people who continue to perpetuate misinformation through private facebook groups (they get sneaky and use alternate spelling and code words) and private accounts. The number of lives impacted and lost cannot be measured. All the best with the decision you are making! I do hope it makes facebook a better place to engage.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10659

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

As an infectious disease specialist I have seen firsthand the death and suffering caused by the torrent of online COVID misinformation.

Full Comment

Since the very beginning of the COVID 19 pandemic online misinformation has raced ahead of the facts often drowning them out with deadly consequences. In the very beginning of 2020 there were people who refused to believe that we were in a public health emergency. They did not protect themselves and their families because they believed the lies they were being told. Later on ridiculous and utterly ineffective treatment were hawked online by charlatans. I had patients who arrived in my ICU on toxic drugs that did nothing to fight their disease. My fellow physicians and my nurses have been verbally abused and physically threatened by **patients, families convinced by what they were reading online that their loved one** would benefit from quack therapies. I have had so many patients tell me when discussing vaccines that they are so afraid and don't know who to listen to. They hear horror stories online but see the ongoing toll of COVID 19 every day. They are frozen by uncertainty at a time when their lives depend on protecting themselves and their families.

There are so many cases that I will never forget, patients who will haunt me for years to come. The teenager only a few months younger than my daughter who will never get to go to college because he thought that COVID only killed the elderly. The mother of three who desperately needed a lung transplantation but turned it down because she was too afraid to get the COVID vaccine. Her children will now grow up without her. The family that threatened to wait in the parking lot and beat up my nurses. The bomb threats to our clinics. The terrible toll that all this took on exhausted and demoralized health care worker just trying to save lives. I do not

blame these patients and family members, they were doing what they thought was best because they had been lied to.

It is not the responsibility of the general public to understand the nuances of clinical trials and the technical safety data from vaccine monitoring agencies. It is the responsibility of the platforms that allow this misinformation to spread. Simply put inaction on stopping the spread of this misinformation has cost and will continue to cost thousands of lives.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10662

Public comment number

United States and Canada

Region

Bill

Commenter's first name

Hough

Commenter's last name

English

Commenter's preferred language

retired

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

**I oppose the removal or “shadow banning” of anyone because they question COVID lockdowns, vaccines, or the origins of the virus?**

Full Comment

Considering how everyone from Fauci on down changed their story regarding all things related to COVID, Facebook should not censor anyone who questions COVID lockdowns, vaccines, or the origins of the virus? Even CDC changed their guidance to emphasize an increasing focus on individuals making their own decisions about their level of risk and how they want to mitigate that risk. Most notably, the new guidance brings the recommendations for unvaccinated people in line with people who are fully vaccinated – an acknowledgment of the high levels of population immunity in the U.S., due to vaccination, past COVID-19 infections or both. Stop censoring COVID-related posts.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10663

Public comment number

United States and Canada

Region

Matthew

Commenter's first name

LeFluer

Commenter's last name

English

Commenter's preferred language

Green Mountain Self-advocates

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

Facebook COVID “misinformation” policy

Full Comment

Citizens and adults young and old with disabilities deserve accurate and fact information not misinformation false information because it hurts the information economics on how we interpret language easy to read and understand language and knowledge misinformation and accurate information or false information hurts communities of color disabilities religious beliefs Etc everyone has a right to participate and speaking the truth and acceptance of individuals and being truthful to our constituents and individuals that read interpret understand comment reply and discussion and issues about what we see interpret facts and knowledge with truthful understanding that misinformation hurts everyone.

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10665

Public comment number

United States and Canada

Region

Raj

Commenter's first name

Eldridge

Commenter's last name

English

Commenter's preferred language

Eldridge Land and Cattle

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Current research seems to show disinformation is spread deliberately to achieve likes. Consideration for the attitudes of vulnerable populations to the message shown in a post even when "fact checked" as "false" should be considered. Since many in the vulnerable population are not sophisticated internet users, the perception that "fact checked" is just a "political statement" from an outside group seems to mean that the message behind the "fact checked" post is seen as valid information despite the fact checking. Since vulnerable populations are ACTING on this misinformation, the only current solution to achieve protection of the health of vulnerable populations appears to be suppressing the misinformation on platforms like facebook

Full Comment

I believe significant consideration should be given towards the understood principles behind sharing misinformation knowingly (ex <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7541057/> ).

Since current research seems to indicate that people knowing share facts they believe to be untrue in order to gain "social status" (ex. likes) AND the perception among many people is the fact checkers are incorrect, permitting posts to remain with a "fact check" disclaimer does not slow the spread of misinformation to vulnerable parties who are not sophisticated enough to understand they are indeed seeing information that may cause them harm.

As seen during the COVID-19 pandemic, many people started referring to COVID as "couf", vaccination as "jab", or other euphemisms in order to post misinformation without having posts blocked. A review of the type of misinformation spreading on

thedonald.win (now patriots.win) is a likely scenario for what types of posts facebook will likely continue to encounter. The general sentiment from some who are deliberately sharing misinformation is that the reader needs to be sophisticated enough to discern fact from misinformation and it is not the responsibility of the "sharer" to limit the spread of misinformation. Unfortunately, the sharing of the misinformation then can lead to conspiracy thinking and mass hysteria. The only way to prevent vulnerable populations from falling into conspiracy thinking appears to be to prevent the posts from sharing and preventing mass hysteria. The idea that a vaccination could somehow have something to do with 5G radio signals seems completely out of the realms of reality if you understand that 5G refers to radio signals, however, vulnerable populations did and do believe that somehow a vaccination is tied to "5G" and "5G" is a bad thing. The idea that vaccination could somehow have something to do with Bill Gates implanting microchips into people seems completely out of the realms of reality, however, vulnerable people did and do believe "Bill Gates" is intending to "mark" all humans. The vulnerable populations may not believe this type of misinformation initially, but when repeatedly exposed and especially when "fact checked false" the vulnerable population seems to believe a conspiracy to "hide the truth" is in play at facebook.

I would assume the readers of this comment are relatively sophisticated internet users, however, many people who are not sophisticated internet users use facebook daily and rely on published information as fact.

There is likely a correlation between people who were taught in school that words printed in a book are "facts" that can be used to "validate" opinions (as opposed to "words printed in a book are an opinion that was printed") and likelihood to believe misinformation they see multiple times and further to model their approach to life/behavior around such "facts" (misinformation).

No solutions to misinformation on a large scale have been proposed to change the perceptions of all printed material from any authority source regardless of that source's basis for credibility in the realm of the particular "facts", to effectively raise the level of internet sophistication of the vulnerable populations, or to communicate trustworthy guidance on shared misinformation (ex. "fact checked false" now means a post is compromised by a different political party).

Since vulnerable populations are ACTING on this misinformation, the only current solution to achieve protection of the health of vulnerable populations appears to be suppressing the misinformation on platforms like facebook so it cannot be shared.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10666

Public comment number

United States and Canada

Region

Charles

Commenter's first name

Greathouse

Commenter's last name

English

Commenter's preferred language

NYSTEC

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Meta should continue to remove content that has an imminent risk of physical harm relating to any ongoing health emergency, including:

- \* COVID-19 (pandemic)
- \* HIV/AIDS (pandemic)
- \* Monkeypox (PHEIC)
- \* Polio (PHEIC)

Less-intrusive measures will be appropriate only when the public health emergencies have passed.

Full Comment

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- \* COVID-19 (pandemic)
- \* HIV/AIDS (pandemic)
- \* Monkeypox (PHEIC)
- \* Polio (PHEIC)

Less-intrusive measures will be appropriate only when the public health emergencies have passed.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10667

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

Linking to good information is better than trying to have algorithms figure out what is bad information.

Full Comment

As a pediatrician and child advocate, my main concern during the pandemic was that our mitigation measures were causing more harm than good to children. For example, as early as March 2020, I was very concerned that widespread public school closures (which was counter to specific CDC guidance at the time) would cause many unintended negative consequences for our most vulnerable inner-city children. I was dismayed, then appalled, when scientists and doctors raising legitimate, well-intentioned concerns about lockdowns and/or school closures were censored, "cancelled" or even professionally disciplined or fired. Unfortunately, my concerns about widespread and open-ended school closures (expressed at the time in an unpublished letter to the New York Times) were realized in their entirety. When there are many unknowns, it does not make sense to censor debate among scientists and doctors. One example of a censorship "misfire" by Meta was when Instagram censored the Cochrane Database (the main repository of medical evidence used by physicians and scientists). Another problem during the pandemic was that public health authorities embraced the "noble lie"--telling the public half-truths or outright misleading information in order to get people to behave in the desired manner--rather than providing accurate information and empowering the public to gauge their own risk and make their own decisions. To my mind, this is the root of the greatly increased distrust in public health authorities that has developed during the pandemic in the US. Given that our understanding of the pandemic changes with new information and new variants, I believe that Meta's attempts at censorship to date have done more harm than good. Rather than

censoring or deplatforming via algorithm, to me it makes much more sense to provide links to data and/or trusted information sources, when a post is determined to be of questionable information.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10672

Public comment number

United States and Canada

Region

Daniel

Commenter's first name

Remick

Commenter's last name

English

Commenter's preferred language

Boston University School of  
Medicine

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

False or misleading healthcare content should be removed from Meta.

Full Comment

Many people search Meta and other social media platforms for information about their healthcare. In many instances sound medical advice, or links to legitimate websites, are provided. However, dangerous healthcare information may be provided. This advice could cause actual harm (drinking disinfectants) or deter individuals from taking actions to protect their health. Anti-vaccine information has lead to surges in previously controlled infectious diseases such as measles or discouraged people from taking vaccines directed as SARS-CoV2 (the virus causing COVID).

Meta should take a stronger stance and actively remove false information, rather than just providing context. The subtlety of the context may be lost.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10673

Public comment number

United States and Canada

Region

James

Commenter's first name

Lewis

Commenter's last name

English

Commenter's preferred language

Center for Strategic and  
International Studies

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

The fundamental question is what is Meta's responsibility, determined both by law (this includes its corporate responsibilities to shareholders), and to serve the larger public interest. Meta will be held to a higher standard of responsibility when it comes to public safety and public trust. Labeling and demotions do not meet this standard. Meta should continue to remove postings of information that poses risk to public safety and health.

Full Comment

Social media creates political forces that democracies find difficult to manage. These forces create a diffusion of authority and a questioning of legitimacy and expertise. New media outlets differ significantly from conventional media in content creation and curating, making existing rules and norms difficult to apply. The fundamental question is **what is Meta's responsibility, determined both by law** (this includes its corporate responsibilities to shareholders), and to serve the larger public interest. These are ultimately questions of acceptable risk – financial, reputational, and to public safety. The development of new norms of behavior for social media and the responsibilities of social media to the larger body of citizens will take time. We can, however, identify some general conclusions to help the Advisory Board as it considers whether to modify existing constraints on the posting of false information. Irrespective of intent, an initial question is how to determine what is false. Determining falsity is not as complicated as public or academic debate might make it seem if we adopt certain practical measures to determine veracity, and if we dismiss objections whose intent is to promote a particular political viewpoint. Distortion of fact to serve political ends is not new (although social media greatly expands the scope), and the standard tests of asking who benefits, if

conclusions are testable and repeatable, and other tools of logic, statistics and, **research still work. The more difficult issue is deciding what are Meta's** responsibilities once it has determined information is false. Does Meta have a responsibility to mediate content (as the editors of a newspaper mediate op-eds and letters) and are Meta's platforms are a public space where anyone can speak freely, or are they private spaces, subject to rules created by the owner. Ownership and Property These questions predate the appearance of social media and go back to the chatrooms and bulletin boards of the early internet, where administrators took a tolerant approach to content, guided by the narrow constraints applied to free speech in the United States (no advocacy of specific act of violence for example, or content that would be considered libelous or slanderous under American law). This is a much-studied topic and there are precedents that point to greater authority for control of content by the platform owner. One is the physical placement of political signs. Regardless of the accuracy of an assertion, a person is free to place any sign they want (again subject to the narrow constraints of laws governing speech) on their own property. They do not have the right to place a sign on the property of their neighbour or on property they do not own, and the owner has the right to remove the sign. Another is the expression of views in a quasi-public space, such as the court of a shopping mall. A mall must allow private conversation not directed at a larger audience, but if the speaker takes megaphone to address a broad audience, it has the right to eject the speaker. Both revolve around the issue of property rights and the question of whether a person can force a property owner to take an action **involving their property that is contrary to the owner's preferences. That there is no obvious charge for using Meta's services confuses the issue by creating the** appearance of a public space even if it is in fact private. Various tests, such as whether the space would continue to exist without the action of Meta or if the space is a free good requiring no private expenditure to exist, allow us to assert that Facebook and Instagram are private spaces. This means that Meta has no responsibility or obligation to publish anything submitted to it. This is not an issue of truth or falsehood. My sign may be accurate in its details but this still does not **give me the right to place it on someone else's property. If Facebook and Instagram** are public spaces, these arguments of unfairness and bias have merit. If they are private spaces, the argument collapses. Meta has the right to choose what appears on its platforms. Responsibility for Harm This right does not address **Meta's ethical** responsibility for potential harm from false statements. The most significant question for Meta in regard to anti-vax statements is whether the content increases or decreases the likelihood of death or serious illness requiring hospitalization. Putting aside efforts to obfuscate this matter, as in false assertions that there is no evidence that vaccines reduce the chance of death (demonstrably false) or that their benefits are outweighed by unproven assertions of risk from vaccination, the question can be resolved by statistical enquiry, not opinion or belief. Do fewer people face hospitalization or death if Meta takes action to block content? In the



case of anti-vax postings, the answer is yes. Allowing the publication of information that increases the chance of death changes the issue of content removal entirely. For example, the Flat Earth Society, which like the anti-vax community also rejects observable evidence that contradicts its assertions, does not create a threat to life. Meta does not have grounds to constrain those who argue the earth, is flat but it would be irresponsible not to constrain anti-vax commentary. If Meta knowingly allows content that increases the chance of death, they bear responsibility for deaths that occur as a result. Disagreement is at the heart of politics, and disagreement is now accompanied by invective, appeals to various asserted rights, and charges of **bias. This inflames the issue of Meta's responsibility but does not change the** fundamental. If an elected official advocates drinking bleach to cure Covid, Meta has an ethical obligation to block this harmful content even if it is not acted on by most of the general public. Simply labelling the posting is insufficient for the potenti

Link to Attachment

[PC-10673](#)

PAO 2022-01

Case number

PC-10676

Public comment number

Europe

Region

Roy

Commenter's first name

Gould

Commenter's last name

English

Commenter's preferred language

Mark Goucher Productions Ltd

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Facebook is a platform for comments, ideas and debate.

Full Comment

Facebook is NOT here to only publish Government propaganda. The 'misinformation' that Facebook has censored is now now becoming the truth (as it always was). The last two years have seen western society bullied into undergoing inhuman suffering aided by Facebook, MSM and other online platforms - This must stop, now.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10679

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

You have spoken about only publishing information that does not contrast that of the authoritative stance on a matter. Time and time again, information from an person in authority has been woefully inaccurate and more often than not, outright lies. Can we please confirm that authority does not equal factually accurate.

Full Comment

It is of considerable importance that censorship not be run by "a side" or from a point of bias. Many times, so-called fact checkers are inexperienced in the field they are trying to fact-check, often citing information handed to them from authority rather than tenured scientists of the branch of science in question. More often than not, the fact-checking journalists deem things "untrue" after cherry picking small elements of a study, observation etc. This is not good enough reason to censor anything.

As I have commented, information from Authority is often corrupt and politicized beyond reason. For example, "Vaccines will stop you catching COVID" to paraphrase President Joe Biden. Not only did scientists know this was false at the time of him stating it to the American people (and let's face it, the world stage), but it is now laid bare for all to see that it was a lie. Where has fact-checking been? Where has censorship been on this issue?

This is one of hundreds, if not thousands, of times a politician has lied or otherwise obfuscated the truth over the course of the pandemic in order to push an agenda or merely be seen to move politically; "Do something!" comes to mind. Given the millions of people who moved to have themselves injected on the grounds that it would "stop you catching COVID", should you (see Fact-Checkers) not be pushing

for complete transparency? Or, is it as I suspect, merely fact-checking from bias and opinion as Facebook recently stated about it's own fact checkers...  
Please do not censor from a point of authority.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10680

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Today's perspective allows us to objectively reflect on all misinformation, both censored and uncensored. Meta's active suppression of any counter to the official narrative removed balance from the public discourse and enabled official (i.e. political) misinformation - of which there has been plenty - to propagate unchecked and unchallenged. The censorship, while perhaps well intentioned, is thus in itself a harmful act.

Full Comment

The actions of Meta (and other social media platforms) in censoring content and individuals deemed to be associated with "misinformation" have been an unwelcome subtraction from the public discourse in these times. Particularly concerning has been the manifest bias in the approach, and in the process the silencing of eminently qualified individuals able to offer genuinely scientific expert analysis; in effect redefining misinformation as "information not consistent with the central narrative". With hindsight, it is now eminently clear that many, many statements made by official authorities (across the globe) could reasonably and objectively be defined as misinformation, for example with regard to mask effectiveness, vaccine efficacy and safety, the origins of covid, age stratification of covid mortality, natural vs vaccine immunity, etc. The shifting and restating of the official narrative as the falsehood of previously stated "facts" became apparent has been plain to see. These statements - amounting to political propaganda - were allowed to be stated and restated without limitation, qualification or disclaimer. The effective silencing of any counterpoint to the official narrative has had a chilling effect on the debate and challenge that is absolutely essential to a functioning liberal democracy. For Meta to have taken such a line during a brief time of

apparent emergency is perhaps understandable, but to continue to do so for more than 2 years is unforgivable.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10683

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

- 1) I believe skeptical views about govt. policies deserve a fair hearing when they're not crafted to profit from selling fake 'cures' etc..
- 2) In particular, skepticism from experienced, accomplished scientists, such as the Great Barrington Declaration signatories, should always be given fair hearing without censorship or 'shadow banning' designed to reduce viewership.
- 3) Facebook's intentions were good, but the view that Facebook and the fact-checking orgs it works with have the capability to determine the 'truth' about a new and widely studied illness is unrealistic. There's still much scientific debate now.
- 4) Steps to censor or reduce viewership of vaccine injuries (now well documented) may have led to net social harm.

Full Comment

The issue of whether Covid-19 vaccines can cause injuries is particularly sensitive. Firstly, the British Medical Journal confirms that the UK govt. has begun to make payouts to people injured by Covid Vaccines:

<https://www.bmj.com/content/377/bmj.o1565>, so I believe it is beyond dispute that Covid vaccines can cause harm.

A deeper question might be; despite the occasional injuries, should we encourage the public to take the vaccines anyway, won't the net benefit to lives saved be greater?

I think a decision to deliberately suppress or 'slow the spread' of information like this violates the principal of 'informed consent' in delivery of medication.

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10684

Public comment number

Europe

Region

Richard

Commenter's first name

Baron

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Facebook has become a leading public forum. It should not restrict content at all.

Full Comment

Facebook is now a leading public forum, along with Twitter. Access to it for the sharing of ideas is just as important as access to the marketplace was centuries ago, and the right to publish newspapers of any political persuasion in recent centuries. Facebook should make no attempt to control the sharing of scientific social or political views, not even ones that are overwhelmingly regarded as mistaken. Meta is an American corporation. Stand by the values of the First Amendment, and when any government asks you to restrict access to content, tell them that you will do no such thing (and publicly announce the request, in full detail, naming the responsible official or politician).

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10685

Public comment number

Asia Pacific and Oceania

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Freedom of speech is a fundamental rule of a modern democratic society. To remove freedom of speech is to remove democracy itself. In removing democracy, you remove the rights of the individual. And in removing the rights of an individual, you remove democracy.

Full Comment

To restrict and/or remove an individual's right to freedom of speech is contrary to the laws of democracy that most western countries are founded upon. To remove or restrict information and/or communication in regards to scientific evidence is paramount to Treason. To offer an open platform of communication, as well as a "private messenger system", that ends up being monitored and policed in regards to views and opinions is a form of deceit, betrayal and treason. Betraying and/or victimising your fellow man in the name of popularity, a social score, or an agenda, is about the most lowly moralistic claim to an action that could be. To defend an action and a system as a result of perceived social standing and morals is about as narcissistic as you can get. Regardless of the rhetoric, the world cannot function under a one world government. The whole system will collapse and implode. And then it will be reborn again under the laws of nature. Take all the time you like to think about it.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10686

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Facebook's "fact-checking" has been completely counter-productive. It has silenced knowledgeable professionals and suppressed or cast doubt on valid information, while allowing false claims to go unchallenged.

In short, the so-called "fact-checking" has been unfit for purpose. Deliberately or otherwise, it has promoted harmful propaganda, making it more difficult for people to access medical opinions that could have saved lives.

Full Comment

Facebook's "fact-checking" has been completely counter-productive. It has silenced knowledgeable professionals and suppressed or cast doubt on valid information, while allowing false claims to go unchallenged.

In short, the so-called "fact-checking" has been unfit for purpose. Deliberately or otherwise, it has promoted harmful propaganda, making it more difficult for people to access medical opinions that could have saved lives.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10687

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Why do you treat your clients like children?

Full Comment

By continuing to censor content that you cannot possibly know is misinformation you alienate your own clients pushing them towards sites that could draw them into conspiracy theories. Censorship NEVER leads to anything good. Good speech must be allowed to prevail over bad. Grow up META.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10689

Public comment number

Europe

Region

Sandra

Commenter's first name

Barwick

Commenter's last name

English

Commenter's preferred language

None

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Facebook causes more danger by stifling discussion than by censorship.

Full Comment

Facebook can legitimately censor content which breaks laws. But to censor scientific debate or accounts of the experience of new medical products which are potentially harmful is extremely dangerous in itself. Free speech as protected under the First Amendment is a safer course. Censoring in line with claims from bodies partially funded by pharmaceutical companies might be well intended, but it turns Facebook into an arm of these interests. The CDC for example is now admitting it made mistake. Facebook joined with those. Censoring in line with Government pressure or position turns Facebook into an arm of a particular political group. The Covid vaccines were and are under tested compared to traditional vaccines. By censoring discussion of inevitable side effects and harms from them as these emerged, Facebook directly contributed to harms and deaths to those who took them without informed consent.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10690

Public comment number

Europe

Region

Kenneth

Commenter's first name

Burnley

Commenter's last name

English

Commenter's preferred language

N/a

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

There should be no censoring of debate or comments whatsoever.

Full Comment

Whatever a person's views on this, they should never be subjected to censorship. We live in a society where free speech is a fundamental right, and no one has the right to curtail that freedom of expression.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10692

Public comment number

Europe

Region

Reginald

Commenter's first name

Vernon

Commenter's last name

English

Commenter's preferred language

not applicable

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Meta should not be censoring content relating to Covid

Full Comment

competing views should be tolerated. misinformation is categorised as information not acceptable to authorities but official information has been shown to be insufficiently explicit or comprehensive, especially in relation to vaccine efficacy and side effects. without critical scientific papers and independent oversight, much harm can result from uninformed consent to vaccination.

misinformation also applies to electoral malpractice. it has been well established by scientific studies that electronic voting machines can be programmed to flip votes. there is evidence of ballot harvesting and other election malpractice. it is wrong to censor evidence that supports critical review of election malpractice.

it is also wrong to censor people just because you don't like what they say. either what they say is true, or it is not true. if it is not true then they can be challenged and the truth will out. meta should not act as judge and jury

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10694

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

This is really simple.....Facebook/Meta's response to Covid and Climate Change to date has been frankly disgraceful. We are supposed to live in a democracy where free speech has been the cornerstone of progress. Suppression of free speech is a big step in the wrong direction we should have learned from. Book burning (the historical equivalent of what you're doing) NEVER ends weell

Full Comment

Time after time, posts censored for misinformation have subsequently been found to be accurate or with merit. (Origination of the virus, Gloves, Masks, Lockdowns, Vaccine efficacy and safety) More importantly, the concept of free speech has been eroded in favour of politics, consensus logic and groupthink. Exactly the same is happening with Climate change as a "settled science" - not only is it not settled but much of the narrative is highly flawed.....just as the Covid narrative was. The outcome of all the "fact checking" (by non-experts may I add) is that Facebook/Meta have just added to the growing loss of trust in Governments, Big Tech, Big Pharma, Big food etc. raising questions of deeply embedded corruption. As for algorithms employed by Meta to feed content into users, the governments of the world are already under fire for their unethical "nudge" tactics. Be sure that Social media platforms will come under the same fire.....and that Governments will throw you under the bus to save their own skins

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10695

Public comment number

Europe

Region

Peter

Commenter's first name

Plail

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Science is dynamic. Knowledge advances through experimentation (experience) and debate. Arbitrarily fixing scientific knowledge at a point in time is censorship.

Full Comment

Many, if not all, currently accepted scientific positions have been arrived at by an iterative process where free debate between all concerned has allowed the position to be refined. Indeed, many current theories were previously rejected by mainstream science.

Fundamentals such as the geocentric universe were once deemed to be heresies and rejected by the authorities of the day.

The Oversight Board should be concerned simply with the law of the land (wherever the user resides) because it is clearly delineated.

Matters of science are never absolutely decided, and the Board should not intervene in any debate on the basis of transient scientific opinion. In particular the Board should reject all attempts at governments to define a scientific position.

There is no such thing as consensus in science, just prevailing opinion, which history has shown is generally transient.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10696

Public comment number

Europe

Region

Cameron

Commenter's first name

Rose

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

The following extract from The Washington Post (22nd August 2022) sums up my views on the deleterious nature of the attempt to censor views running counter to the 'government narrative'. Facebook has largely endorsed that narrative - to the great harm of the reputation of science, freedom of debate, the welfare of the economy, trust in public health claims and Facebook itself.

Full Comment

Anthony Fauci announced on Monday that he will step down from his National Institutes of Health leadership posts in December, and the fact that this is a major news story suggests the problem with his tenure. He became the main symbol of the rule by experts who imposed lockdowns on America and brooked no scientific debate on Covid. Dr. Fauci has led the National Institute of Allergy and Infectious Diseases (NIAID) since 1984, and his personal research contributions are impressive. He first became known to the public during the early years of the AIDS epidemic, and his agency was an early backer of the mRNA technology that became the platforms for two Covid vaccines. But the main legacy of his 38-year tenure will be as the public face of government during the Covid pandemic, for better and worse. His reassuring authority won acclaim in the early weeks of the pandemic as **Americans struggled to make sense of the threat. "Fifteen days to slow the spread,"** he famously said in March 2020, and the Trump Administration and America picked up his refrain. The two weeks would stretch to two years. The uncertainties of the **pandemic's course weren't his fault, but the certainty of his policy** He and a passel of public-health experts used their authority to lobby for broad economic lockdowns that we now know were far more destructive than they needed to be. He also lobbied for mask and vaccine mandates that were far less protective than his

assertions to the public. Dr. Fauci's influence was all the greater because he had an echo chamber in the press corps and among public elites who disdained and ostracized dissenters. A flagrant example was Dr. Fauci's refusal even to consider that the novel coronavirus had originated in a lab at the Wuhan Institute of Virology in China. This may have been because the NIH had provided grant money to the nonprofit EcoHealth Alliance, which helped fund "gain of function" virus research at the Wuhan lab. In a semantic battle with Republicans, Dr. Fauci denied that the NIH funded such research. But his refusal even to consider the possibility that the virus started in a Wuhan lab showed that Dr. Fauci was as much a politician as a scientist. Worse, Dr. Fauci smeared the few brave scientists who opposed blanket lockdowns and endorsed a strategy of "focused protection" on the elderly and those at high risk. This was the message of the Great Barrington Declaration authors, and emails later surfaced showing that Dr. Fauci worked with others in government to deride that alternative so it never got a truly fair public hearing. "There needs to be a quick and devastating published take down of its premises," NIH Director Francis Collins wrote to Dr. Fauci. Their inability to abide criticism and dissent undermined the U.S. pandemic response. "It's easy to criticize, but they're really criticizing science because I represent science. That's dangerous," Dr. Fauci said last November, in a comment that summarizes the view of the public-health clerisy. The public is supposed to let a few powerful men and women define science and then impose their preferred policies and mandates on the country. The costs of that mindset have been severe, and not merely economic. We know now that states that locked down fared no better, and sometimes worse, than those that didn't. We also know that the vaccines, while invaluable against serious disease, don't prevent the spread of Covid—even after multiple boosters. More honest candor would have been better for America's trust in public-health authorities. "Whether you've met him personally or not, he has touched all Americans' lives with his work," President Biden said Monday about Dr. Fauci's resignation. That's true enough. BUT THE LEGACY WILL BE THAT MILLIONS OF AMERICANS WILL NEVER TRUST GOVERNMENT HEALTH EXPERTS AGAIN.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10697

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Meta/Facebook should NOT be involved in any way in deciding what is or is not covid 'misinformation' or even dis- or mal- information. It is not the role of a private for profit business to act as gatekeepers of the public discourse and public freedom of speech.

Full Comment

Meta is a private company who should have ZERO/NO involvement in policing any speech on its platforms in relation to Covid 19 or indeed any other medical issue or societal/political issue. Meta should not place labels on posts or articles, should not take down or censor or accuse an individual/body/organisation of 'misinformation' - it is not the role of a multi-billion dollar for profit business to act as a gatekeeper of the public square or public discourse. It is not the role of a private/traded business to act as the gatekeeper of what is or is not information for any government or any other private business (e.g. pharmaceutical company). It is not the role of Meta/Facebook or similar to decide what can or cannot be said. Meta should not restrict or curtail the ability (and indeed the right in the USA under 1st Amendment to the Constitution) of its users to speak freely about any issue. In areas or countries where freedom of speech is not enshrined in law it should be Meta's role to actually champion itself as a bastion of free speech for all, regardless of that content. Meta must be curtailed (if necessary by law or by it being broken up) if it continues to limit or destroy on its platforms freedom of speech or expression of opinion or freedom of knowledge. Neither science, speech or knowledge are owned by anyone body, business or government. Meta's users should be treated like adults and allowed to make their own minds up about any issue. It is not the responsibility of a Silicon Valley glorified pub lunch meet up business to police (either independently

or by edict from government) what private individuals or organisations can or cannot say.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10698

Public comment number

Europe

Region

Chris

Commenter's first name

Phillips

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

How does Meta determine what the authoritarian information is and what will meta do when that information is proven to be false and in itself misinformation.

Meta/Facebook taking sides leads it open to manipulation from authoritarian states and global campaigns, stifles debate and ensures promotion of misleading information by removing or discrediting alternative views.

Full Comment

How does Meta determine what the authoritarian information is and what will meta do when that information is proven to be false and in itself misinformation.

Meta/Facebook taking sides leads it open to manipulation from authoritarian states and global campaigns, stifles debate and ensures promotion of misleading information by removing or discrediting alternative views.

During the pandemic, world leaders including president Biden and prime minister Johnson told us explicitly that the cv19 vaccine will stop people getting cv19 and stop it spreading. Any comments not supporting that narrative were labelled as misleading and led to common consensus that anyone questioning the narrative was anti vax.

As a scientist, I'm trained to question everything and look for answers yet any mention that I'd like to see evidence was met with scorn of being anti vax, despite me taking the vaccines as the world's medical leaders and world leaders told us it was safe, would stop me getting cv19 and stop it spreading.

Fauci and Biden are but 2 prominent examples of people who have had all their vaccines and boosters yet tested positive for cv19 twice within 2 weeks.

Their statements that the vaccine stops you from catching cv19 and stops it spreading were at best misleading and at worst false.

They had the information yet persuaded us otherwise.

Same stories for climate change.

Facebook/meta should enable debate, not stifle it. Provide tools for people to do their own fact finding rather than stop people discussing alternatives narratives.

Facebook/Meta has become a tool for promoting single narratives and stifling debate about issues with those narratives.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10699

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

You have no right to be omniscient with regard to scientific information. It is offputting and ignorant. What do you think Galileo would say?

Full Comment

This is a relatively new virus and information is being discovered about it all the time. How ignorant of you to decide which bit of information you will allow to be shown. You are only a platform to disseminate information. Only on matters of physical violence should you take the decision not to platform. People can find out information elsewhere anyway. Such a stance will make you look as if you (or your idealogues) have something to hide. Show the information and add sites where people can find out more, as it is a controversial subject, if you wish. You are stepping way out of your remit. Are you Olympian Gods, or something? Experts the world over object to the way Covid has been handled and portrayed. Who are you to have the definitive say on the subject? It may turn out that you are the ones propagating misinformation because you have blocked accurate information. Plenty of sites offer sources of information. You seem to think people are cretins and that you must control what information they are allowed access to. You are extremely out of step with the modern citizen who now has a wealth of information at their fingertips.

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10700

Public comment number

Europe

Region

Richard

Commenter's first name

Hughes

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

There is very rarely such a thing as "settled" science

Full Comment

I would respond that no censorship is required re covid.

Why?

There is no settled science just WHO and government endorsed views. CDC guidance has changed re vaccination, subtly yes.

Just look at other areas of "settled" science. Science that was settled years ago allegedly.

In the last month the benefit of serotonin for mental health has nigh on been debunked. Research on amyloid plaques causing alzheimers, the same. I remember one glorious week a few years ago when the Lancet and british Medical Journal had contradictory articles on the benefits or otherwise of statins.

Serious debate is required. There are and will continue to be massive and genuine debates pf the benefits and consequences pf lockdowns, vaccines and masks.

It is not the function of Meta to take sides

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10701

Public comment number

Europe

Region

Susan

Commenter's first name

Rose

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

The actions of Facebook over the past 2 years have been appalling - censorship of the worst kind when there could have been free discussion and thus the advancement of knowledge.

Full Comment

Facebook has played a part of the stifling of free speech and the suppressing of debate by censoring both. The idea that a 'fact checker' should judge a professor with dozens of papers to his name and decades of experience would have been considered laughable until recently. Science has never progressed by the shutting down of debate and new ideas, why should a social media company decide what is right and what is not safe for grown adults?

Facebook behaviour over COVID discussion had been appalling.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10702

Public comment number

Europe

Region

Chris

Commenter's first name

Bullick

Commenter's last name

English

Commenter's preferred language

The Pull Agency

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Facebook should not censor anything that is legally allowed in the country of origin

Full Comment

Facebook's role in the the Covid pandemic has been deplorable.

Science is forever in flux, developing and under debate. There can never be a one and only truth. The idea that all governments and supra-national institutions are always correct on matters of science and medicine, and anything that questions, challenges or contradicts their view is misinformation or disinformation, is stupid and incredibly dangerous. Facebook has partnered with governments around the world to propagandise their often erroneous information and points of view and suppress free speech. This is unforgivable.

It is on the basis of Facebook's censorious, high-handed and authoritarian behaviour to support dangerous government ideologies that I have personally given up the platform.

A complete abandonment of this policy would make me change my mind about using Facebook.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10703

Public comment number

Asia Pacific and Oceania

Region

Jun-E

Commenter's first name

Tan

Commenter's last name

English

Commenter's preferred language

Khazanah Research Institute

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

We do not recommend a single global approach, bearing in mind country-level diversity, especially in the Global South.

Given various country-level heterogeneities, we recommend erring towards caution and continuing with the removal of problematic content. Eventual transition to third party fact-checking coupled with labelling as a long-term solution can be done to contextualize the debate surrounding misinformation.

We recommend improving transparency for algorithmic and human third-party fact-checking processes.

We recommend improving multi-language models for algorithmic detection systems and hiring fact-checkers with models for algorithmic detection systems and hiring fact-checkers with multi-language competencies.

Full Comment

Response to Meta PAO request on removal of Covid-19 misinformation Input to Meta, 25 August 2022 1. SUMMARY 1.1. We do not recommend a single global approach, bearing in mind country-level diversity, especially in the Global South, in terms of Covid-19 management, vaccine distribution, and access to trustworthy and regularly updated health information. 1.2. Given various country-level heterogeneities, we recommend erring towards caution and continuing with the removal of problematic content. Eventual transition to third party fact-checking coupled with labelling as a long-term solution can be done to contextualize the debate surrounding misinformation, given the longer-term, unknown side effects of Covid-19. 1.3. We recommend improving transparency for algorithmic and human third-party fact-checking processes, such as providing public access to white papers

explaining criteria for identifying misinformation. 1.4. We recommend improving multi-language models for algorithmic detection systems and hiring fact-checkers with multi-language competencies, especially in the Global South.

## 2. PREVALENCE AND IMPACT OF COVID-19 MISINFORMATION IN MALAYSIA

### 2.1. For Malaysia's population of 32.7 million, the Malaysian Communications and Multimedia Commission estimates there are about 24.6 million users of social networking apps, of which 97.3% own a Facebook account .

### 2.2. A separate survey conducted by Vase.ai discovered that most Malaysians rely on social media platforms, including Facebook, as their main news source.

### 2.3. Some examples of recent fake news disseminated in the country include the sharing of a list of areas in the main CBDs of Kuala Lumpur that should be avoided due to a high number of COVID-19 cases and news urging people with pneumonia symptoms to contact a fake communicable diseases control branch .

### 2.4. Being a multi-lingual country, a substantial number of social media posts in Malaysia are written in a combination of at least two or more languages, with the use of shorthand, abbreviations and memes. Fact-checkers ought to be capable of operating in multi-lingual contexts .

## 3. THE USE OF ALGORITHMIC OR RECOMMENDER SYSTEMS TO DETECT AND APPLY MISINFORMATION INTERVENTIONS

### 3.1. We support the use of recommender systems to complement human fact-checking activities and simplify the workload of fact-checkers.

### 3.2. We think recommender systems can be used as preliminary decision filters to help flag posts with probable misinformation content .

### 3.3. There is a need to advance multi-language computational linguistics for better detection accuracy.

## 4. PRINCIPLES AND BEST PRACTICE TO GUIDE META'S TRANSPARENCY REPORTING OF ITS INTERVENTIONS

### 4.1. We fully appreciate **Meta and the Board's commitment** to freedom of expression. However, given country-level heterogeneities in access to reliable health information, unmoderated content runs the risk of being misinterpreted or manipulated especially in the Global South.

### 4.2. If a global approach is taken, we recommend erring on the side of caution and continuing with the removal of problematic content related to Covid-19.

### 4.3. Eventually, a transition towards third-party fact-checking with the use of labels as a long-term solution can allow more media literate people to engage with and contextualize the information so that they are able to evaluate it for themselves.

### 4.4. We further recommend algorithmic transparency in identifying the factors that lead Covid-related misinformation to appear on a user's timeline. This can lead to preventive interventions as opposed to post-hoc interventions. For example, if hubs that drive the spread of covid-misinformation can be pre-identified, then fact-checking and labelling activities might be more strategically targeted towards those hubs and their associated connections.

### 4.5. In the eventual transition towards third-party fact-checking and the use of labels, better clarity on the drivers behind the emergence of Covid-misinformation alongside quantifying its diffusion dynamics might help with more strategic targeting of fact-checking and labelling activities.

## 5. OTHER COMMENTS

### 5.1. As "imminent physical harm" is not easily defined and

may mean different things in different contexts, continuous monitoring and evaluation of harmful effects of Covid-related misinformation, such as disease outbreaks, should be conducted. Regular reporting on these evaluations should be **made available to the public to assess shared standards of “imminent physical harm”**. References Balakrishnan, V. (2022). COVID-19 and fake news dissemination among Malaysians - Motives and its sociodemographic correlates. International Journal of Disaster Risk Reduction. KRI. (2021). #NetworkedNation: Navigating Challenges, Realising Opportunities of Digital Transformation. Kuala Lumpur: Khazanah Research Institute. MCMC. (2019). Internet Users Survey 2018. Retrieved from Malaysian Communications and Multimedia Commission: <https://www.mcmc.gov.my/skmmgovmy/media/General/pdf/Internet-Users-Survey-2018.pdf> Vase.ai. (6 September, 2019). **Malaysia’s 2019 Media Consumption Report**. Retrieved from Learning Resources | Vase Actionable Intelligence: <https://vase.ai/resources/malaysias-mediaconsumption-2019/>

Link to Attachment

[PC-10703](#)

PAO 2022-01

Case number

PC-10705

Public comment number

Europe

Region

William

Commenter's first name

Harradine

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Treat Facebook users as rational adults who can make up their own minds about information. Link to third-party sites, "labelling" if you want, but don't ban posts that you don't like.

Full Comment

Treat Facebook users as rational adults who can make up their own minds about information. Link to third-party sites, "labelling" if you want, but don't ban posts that you don't like.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10706

Public comment number

Europe

Region

Andrew

Commenter's first name

Ross

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

There should be no censorship of Covid-19 comment simply because it goes against the mainstream narrative. There are millions of people opposed to the narrative behind and the response to Covid and they have every right to a voice on any platform. Most of the information put out by Governments, the MSM, the pharmaceutical industry, health services and fact checkers on Covid-19 is very open to accusations of misinformation but none of what they say is ever allowed to be questioned. This is a very dangerous position for society to find itself in. Everyone has a right of opinion and expression and deserves a voice at all times and in all places.

Full Comment

There were plenty of dissenting voices on social media to the Covid-19 story back in early 2020 but one by one these have been censored and cancelled and have been forced to find or create alternative platforms on which to express their views. As a result, the vast majority of the population who by and large are too lazy to look elsewhere for their information, have no idea that there is such a body of opposition to the mainstream Covid-19 narrative. Very few, if any open debates between the two sides have been shown on mainstream channels which is extremely worrying and dangerous. The world today has become like Stalinist Russia, China under the CCP and East Germany under Honicker and has become so because the powers that be and big tech have suppressed opinion that they do not like and demonised those who hold them. In future years many individuals and organisations I'm sure will find themselves on the wrong side of history, will be called to account and then punished for their totalitarian actions. Facebook will be among them for sure



though no doubt by then the individuals concerned will have disappeared off to other organisations to escape that fate.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10707

Public comment number

Europe

Region

Jan

Commenter's first name

Van Rooyen

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

The effectiveness of social media interventions to address COVID-19 misinformation is very poor and therefore impacted freedom of expression, civic discourse and scientific debate.

Full Comment

Social media interventions to address COVID-19 misinformation:

1) Seems to follow a pre-determined narrative pushed by big pharmaceutical companies, governments and state agencies.

2) Characterized the narrative as "science"

3) Characterized the narrative as "truth"

Social media fact-checker and algorithms accepted the idea (a fallacy) that science is truth and is therefore binary. This cannot be the case!

Science is a method of inquiry, not a body of knowledge. Censorship is not part of the scientific method. Censorship is the opposite of the scientific method. Science is an iterative, self-critical process of gathering evidence and applying logic.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10709

Public comment number

United States and Canada

Region

Adam

Commenter's first name

Gladwin

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Any information regardless of whether it is factually correct should be allowed to be posted in line with freedom of speech principles.

Full Comment

Any information regardless of whether it is factually correct should be allowed to be posted in line with freedom of speech principles. In a free and open society people should be free to say or write what they like. This may cause offense on occasions or even mislead but that is a price worth paying for open dialogue that is the cornerstone of any truly democratic society. The alternative is to submit to some sort of "higher authority" who decides what is or is not "true". This clearly reduces open dialogue and diversity of opinion and allows the higher authority to dictate any particular narrative. People should be allowed to decide for themselves what is and what is not "true". Laws already exist to deal with slander and liable and calls to violence or death against people.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10710

Public comment number

Europe

Region

Jilan

Commenter's first name

Shah

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Facebook/Meta's actions on the topic of misinformation and information that could lead to harm sounds like a good idea but warrants a number of questions about whether it is right, necessary and if necessary fit for purpose.

From all my analysis the policy options are flawed?

Full Comment

In assessing the proposed policy, one must first go back and ask what is Meta / Facebook? As a meeting point (virtual) for its members where the member is the product for advertisers per its revenue model - does Meta have a place policing its members thoughts and exercise of free speech rights? I'm mindful that as a private company free speech is considered limited but worth reflecting on Meta's market dominance and position.

Secondly how is harm defined? Physical harm is pretty clear but psychological harm has a massive spectrum depending on the individual concerned. How are words and pictures able to drive physical harm? There are adequate laws for physical harm faced by people.

Also why does Meta feel the need to infantilise its members as if they can't think for themselves and sort the good from the bad? Yes some people will follow a different path to me but why would I breach all restraint, ethics and human rights to force my way of thinking?

How does Meta validate it has correctly intervened by either deleting content, banning members, labelling content etc? A very common phrase which I can't attribute but is immensely instructive is: "winners write history, this is why yesterdays terrorist can be tomorrows freedom fighter". How do you or anyone know for certain which is the right side of any debate, discussion or message?

Overall h the Meta policy is reductive and intensely damaging to a thriving society in the long term.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10711

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Who determines what is "misinformation"? How trustworthy and actual are those resources? How do you know that removing "misinformation" is not, in fact, following a specific political agenda?

Full Comment

The term "misinformation" is a moving target.

As an example, in 2020 the idea that the Coronavirus might have come from a laboratory was considered misinformation. Since then, this has become a possible explanation for the emergence of the virus: nobody is entirely sure.

As another example, in late 2020 mentioning that corona vaccines did not protect against infection was deemed misinformation. This has now turned out to be true.

In both instances, the suppression of information that later turned out to be possible or true, was done based on assumptions. Surely it is vital that any such assumptions themselves can be tested: suppressing dissenting information that may test such assumption is outright censorship to suppress a view that is not mainstream.

Any new advance in science or social discourse starts off as a minority view; suppressing those minority views suppresses the possibility of advancement itself.

We now look at back at Galileo's fate as an irresponsible reaction by the then Church: yet we are now enacting exactly the same but at a much wider level.

Providing labels pointing to alternative interpretations is the only way to keep discourse open. With of course the proviso that such labels should be attached to ALL views: e.g. in 2020, any views on vaccine effectiveness being 100% against infection should have had a label saying "other views do exist". Only then do we have the possibility for open discourse.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10713

Public comment number

Europe

Region

Simon

Commenter's first name

Wood

Commenter's last name

English

Commenter's preferred language

University of Edinburgh

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

There is a danger of non-expert content moderation of a technical topic like Covid leading to serious distortions in the both the state of knowledge presented to the public and in the apparent certainty of that knowledge. This leads to the danger of fueling an immediate over-reaction, at the expense of significant long term harms. However good intentions may be, there is also a danger of undermining faith in science evidence generally if it is presented selectively according to its congruence with a view of the 'public good'. My view is that a balanced approach would flag potentially misleading content, giving an exact description of why it is believed that it may be misleading, but without removal or down-weighting.

Full Comment

see uploaded file

Link to Attachment

[PC-10713](#)



PAO 2022-01

Case number

PC-10714

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Free speech should be protected

Full Comment

People should be free to share different views links to diverse scientific papers and discuss vaccine side effects. Information is still emerging. Only content that causes certain harm such as drinking bleach should be censored. There is much still unknown about the virus vaccine side effects and treatments. People should be able to freely discuss these topics. Recent censorship including articles from the BMJ is a disgrace and has no place in democracy.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10715

Public comment number

Europe

Region

Peter

Commenter's first name

Bell

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Misinformation does not exist

Full Comment

The concept of "misinformation" has been hijacked by those who just will not accept that others may hold different views.

The most obvious example recently is that, until recently, the MSM view was that CV19 evolved from bats, and/or animals in Wuhan wet market. Many people suspect that the virus escaped (whether by accident or design is not clear) from the Wuhan virus reseach lab. At least, nowadays, we are permitted to express that suspicion - not long ago, people we cancelled for less.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10717

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Censorship of divergent viewpoints on the COVID crisis since early 2020 has been destructive of public trust, corroded our political process, amplified the voices of rumor-mongers (rather than constraining them), and fostered the strengthening of ineffective and in some cases actively harmful policy responses. Censorship has served to protect government officials from accountability, prevent adjustment of harmful policies, and constrained public debate on fundamentally important issues of the day.

Full Comment

Censorship of divergent viewpoints on the COVID crisis since early 2020 has been destructive of public trust, corroded our political process, amplified the voices of rumor-mongers (rather than constraining them), and fostered the strengthening of ineffective and in some cases actively harmful policy responses. Censorship has served to protect government officials from accountability, prevent adjustment of harmful policies, and constrained public debate on fundamentally important issues of the day.

Specifically,

- FB decisions to censor "lab leak theory" ideas and evidence helped prevent any solution to questions about the origin of COVID and undermine efforts to prevent recurrence of this pandemic disaster.

- FB censorship of The Great Barrington Declaration helped prevent wide dissemination of a document which in retrospect was prescient, accurate, and extremely useful. Much suffering and death could have been avoided if such voices had not been artificially constrained.

- FB censorship of concerns over masking policies did nothing to protect people from harm and may have contributed to government failure to foster production of more effective masks.

- FB censorship of concerns over school closures helped lead to gigantic learning losses, especially by poor and minority students, while doing nothing to protect students from harm and fueling huge spikes in youth depression and suicide.

These are only a few of the most egregious outcomes of letting a small cadre of people decide what everyone should be able to see and hear. the censors were wrong on every one of these issues as well as many others, and their actions raised the death tolls, increased negative impacts on children, failed to protect the elderly, and undermined the credibility of government, health, and science organizations and authorities by failing to hold such authorities to account. Better censorship is not the answer - no censorship is.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10718

Public comment number

Europe

Region

Roger

Commenter's first name

Watson

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

There ought to be no censorship by a social media company other than for indecent images or incitements to violence. Social media companies have no place in enforcing scientifically disputed government guidelines. All suspended accounts on that basis ought to be restored.

Full Comment

There ought to be no censorship by a social media company other than for indecent images or incitements to violence. Social media companies have no place in enforcing scientifically disputed government guidelines. All suspended accounts on that basis ought to be restored. It is abundantly clear now that lockdowns were severely damaging socially, economically and for physical and mental health; face masks did not work to prevent the spread of Covid and the Covid vaccines are proving both ineffective and, in some cases, lethal.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10720

Public comment number

Europe

Region

Clive

Commenter's first name

Butler

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Check past censorship against current narrative

Full Comment

In order to decide if your remove of content is a valid approach, i strongly suggest you review what has been removed in the past.

In a developing situation the accepted narrative at any point in time can be totally wrong, or not accepted at another point in time. For example the earth is flat was once an accepted position, yet some time later that is not an accepted position. Or more recently, the covid vaccine prevents infection, whereas now it clearly does not. Yet i'm sure comments on the effectiveness of the vaccine to prevent infection may have been removed.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10723

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Stop removing what you perceive to be misinformation. A lot of the things that are removed later turn out to be true.

Full Comment

Covid information does not need to be censored by Meta. People should be able to read all information and make up their own minds. In addition, things often change - eg masks were considered unnecessary in March - June 2020; then essential in July 2020 onwards and now it's accepted that they don't make much difference at all. In the same way, vaccines were said to stop the spread; then they didn't; then they reduced hospitalisation; now they may actually cause deaths from myocarditis (and bleeding from low platelets with Astra Zeneca) My point is that the science and therefore the perceived misinformation changes so it would be better for social media to stop using untrained "fact checkers" to make these temporary judgements.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10726

Public comment number

Asia Pacific and Oceania

Region

Danielle

Commenter's first name

Wiseman

Commenter's last name

English

Commenter's preferred language

Public

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Please stop treating adults like children and allow them to make up their own minds. The labelling of information infantilises people.

Full Comment

You know the old saying that if you give a man a fish he will eat for a day, but if you teach a man to fish he will eat every day? Instead of telling your users what to think, teach them how to think and how to critically review information. The censoring of information or people is what erodes trust. Rather than you deciding what your users can and can't see, perhaps you could empower your users to block those on their feed they feel are not welcome or have unwelcome views. Facebook and its fact checkers has over the past few years censored material from medical journals. Even your fact checkers appear unable to critically evaluate material. You must remember that in the field of science, new ideas or theories are often controversial. The sort of censorship that is being practiced is actually anti-scientific and may suppress information which ends up being correct. I wholly support your making any means of evaluation of when you intervenene transparent for users and those whom you are affecting with your decisions. In summary, please encourage polite debate. Do not suppress it. Thank you for your time and your consideration

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10727

Public comment number

Europe

Region

Toby

Commenter's first name

Young

Commenter's last name

English

Commenter's preferred language

The Daily Sceptic

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

The Daily Sceptic believes all attempts to suppress misinformation should be abandoned.

Full Comment

Submission to Meta's Oversight Board on behalf of the Daily Sceptic I'm not going to respond to the questions directly. The way they've been drafted, it's as if Meta is taking it for granted that some suppression of health misinformation is desirable during a pandemic – because of the risk it might cause “imminent physical harm” – and what you're looking for is feedback on how censorious you ought to be and at what point in the course of a pandemic like the one we've just been through you should ease back on the rules a little. My view is that suppressing misinformation is never justified. The first and most obvious point is that it's far from obvious what's information and what's misinformation. Who decides? The government? Public health officials? Bill Gates? None of them is infallible. This was eloquently expressed by the former Supreme Court judge Lord Sumption in a recent article in the Spectator about the shortcomings of the Online Safety Bill: All statements of fact or opinion are provisional. They reflect the current state of knowledge and experience. But knowledge and experience are not closed or immutable categories. They are inherently liable to change. Once upon a time, the scientific consensus was that the sun moved around the Earth and that blood did not circulate around the body. These propositions were refuted only because orthodoxy was challenged by people once thought to be dangerous heretics. Knowledge advances by confronting contrary arguments, not by hiding them away. Any system for regulating the expression of opinion or the transmission of information will end up by privileging the anodyne, the uncontroversial, the conventional and the officially approved. To illustrate this point, take Meta's own record when it comes to

suppressing misinformation. In the past two-and-a-half years, you have either removed, or shadow-banned, or attached health warnings on all your social media platforms to any content challenging the response of governments, senior officials and public health authorities to **the pandemic, whether it's questioning the wisdom** of the lockdown policy, expressing scepticism about the efficacy and safety of the Covid vaccines, or opposing mask mandates. Yet these are all subjects of legitimate scientific and political debate. You cannot claim this censorship was justified because undermining public confidence in those policies would make people less likely to comply with them and that, in turn, might cause harm, because whether or not those measures prevented more harm than they caused was precisely the issue under discussion. And the more time passes, the clearer it becomes that most if not all of these measures did in fact do more harm than good. It now seems overwhelmingly likely that by suppressing public debate about these policies, and thereby extending their duration, Meta itself caused harm. Which brings me to my second point. Because there is rarely a hard line separating information from misinformation, the decision of where to draw that line will inevitably be influenced by the political views of the content moderators (or the algorithms **designers**), **meaning the act of labelling something "mostly false" or "misleading" is** really just a way for the content moderators (or the algorithm designers) to signal their disapproval of **the heretical point of view the 'misinformation' appears to** support. How else to explain the clear left-of-centre bias in decisions about what content to suppress? We know from survey data that content that challenges left-of-centre views is more likely to be **flagged as 'misinformation' or 'disinformation' and** removed by social media companies than content that challenges right-of-centre views. According to a Cato Institute poll published on 31st December 2021, 35% of **people identifying as 'strong conservatives' said they'd had a social media post reported or removed, compared to 20% identifying as 'strong liberals'.** Strong conservatives were also more likely to have had their accounts suspended (19%) than strong liberals (12%). This clear political bias is one of the reasons suppressing so-called conspiracy theories is counter-productive. One obvious case-in-point is **Facebook's suppression of the lab leak hypothesis in the first phase of the** pandemic, which the Institute for Strategic Dialogue described as a **'conspiracy theory' in April 2020.** This censorship policy was so counter-productive, that today even the head of the WHO is reported to believe this **'conspiracy theory'.** Okay, that particular conspiracy theory is very probably true. What about when a hypothesis is clearly false, such as the claim that Joe Biden stole the 2020 Presidential election? **That's still not a reason to censor it.** That particular conspiracy theory, energetically promoted by Trump himself, played a part in the violent protests by Trump supporters that took place in Washington on January 6th, 2020 and for that reason anyone sharing this theory on Facebook will see their posts instantly removed and they risk being permanently banned from the platform. But if the intention of suppressing **this conspiracy theory was to stop its spread, it hasn't worked.**

According to an Axios-Momentive poll from earlier this year, more than 40% of Americans don't believe Joe Biden won the Presidential election legitimately, a slight increase on the number expressing the same belief in 2020 in a poll carried out before January 6th. To be fair, I don't think the content moderators (or the algorithm designers) are deliberately acting in a partisan way to promote their favoured political candidates and causes – at least, not most of the time. Rather, they believe removing misinformation is good for the health of democracy – it will promote civic virtues like well-informed public debate and increase democratic participation and make ordinary people more responsible citizens. But the problem is that this idea is itself rooted in left-wing ideology, a point made by Barton Sw

Link to Attachment

[PC-10727](#)

PAO 2022-01

Case number

PC-10728

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Albert Einstein's comment on scientific discovery should help inform the oversight board's deliberation: "The process of scientific discovery is, in effect, a continual flight from wonder."

Full Comment

Facebook's disposition towards censorship is a stain on what could be a platform for expanding knowledge. Count the substantial changes in "learning" that the CDC has acknowledged on Covid and vaccines since the beginning of Covid, changes on Covid-related topics that incurred the censorship wrath of FB/Twitter, etc. FB should NOT censor, it looks, and is Fascist. Thanks

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10729

Public comment number

Asia Pacific and Oceania

Region

Michael

Commenter's first name

Bending

Commenter's last name

English

Commenter's preferred language

NA

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

First, it isn't obvious what's information and what's misinformation. Lord Sumption: "All statements of fact... are provisional. They reflect the current state of knowledge and experience. But knowledge and experience are not closed or immutable categories."

Full Comment

I have received a few 30 day bans for posting content that allegedly (I do not agree) goes against Facebook guidelines however the last ban was for posting two scientific studies.

This makes it seem like I am being targeted no matter what content I post or that the AI is not functioning correctly. Or worse - being deliberately targeted by human content editors?

After I finish my current 30 day ban I intend to post 2 more scientific studies to test this hypothesis.

The other issue is that there is no recourse and no process where I can argue my case - Im only asked if I agree or don't agree, but so what, Facebook seems to do whats it wants to do and doesn't care what I agree with....so whats the point in asking? Just to maintain a pretense of objectivity?

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10730

Public comment number

United States and Canada

Region

penny

Commenter's first name

Houston

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

facebook is not an arm of the government. Facebook are not arbitors of truth. They have no right to censor anyone and define what is Misinformation. Facebook should be legally responsible for all physical, mental and economic damage incurred from blocking "misinformation" during a pandemic. They should be responsible to pay damages for vaccine injury/death as result of blocking warnings or injuries

Full Comment

Facebook had a duty to care for its customers and they breached that duty when they censored information to serve a single narrative and were intolerant to anything that did not correspond with government despite coming from highly educated professionals.

Covid vaccine victims who trust Facebook in their internet research were given a single narrative presented as the gospel truth and any information that was essential to health regarding masking, natural immunity, safe alternative treatments and vaccine safety warnings were blocked yet access to the full story could have switched their course of treatment and prevented them from making a wrong descision.

Facebook willfully prevented people from sharing knowledge

Facebook should have to pay for those who were damaged by their censorship.

Facebook also failed its shareholders when it became an arm of the government instead of a profit driven company.

Facebook deserves to be bankrupt

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10731

Public comment number

Europe

Region

IZZY

Commenter's first name

METCALF

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Second, because there is no hard line separating information from **‘misinformation’**, the decision of **where to draw that line will** inevitably be bound up with value judgments and those judgments will reflect the political biases of the moderators, amounting to censorship of views they disagree with.

Full Comment

FACEBOOK/META should not censure alternative viewpoints of the covid or climate change narrative, it just proves it is bought and paid for by some elite bunch of psychopaths intent on ruling humanity. It should be a free speech area open to all sorts of discussion. Banning people from having an alternative opinion to the government narrative is utterly disgraceful.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10733

Public comment number

Europe

Region

Richard

Commenter's first name

Rous

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Third, the best remedy for bad speech is more speech, not enforced silence.

Full Comment

The official lines, some of which were upheld and enforced by Meta and other firms, were substantially wrong or at least not proven right.

1. It was inappropriate to suppress debate on the "lab leak" theory of Covid origins; such debate later became "admissible"
2. It was inappropriate to suppress debate on mask efficacy. There remains no evidence that masks restrict Covid spread particularly as worn in sub-ideal everyday conditions. Mask mandate states have not outperformed mask freedom states. The evidence supporting masks is invariable stylised and artificial.
3. It was inappropriate to suppress debate on vaccine efficacy in restricting infection, which in turn led to pro-vaccine discrimination and sharp divisions in society. It turns out that vaccines have not been effective in limiting infection especially as time elapses and new variants emerge.

Just three examples where the "official line" got it badly wrong. These suffice.

Meta's social responsibility would be better discharged not through censorship but through education.

e.g. (1) "please be aware that the claim you are reading is hotly contested. Science is never settled and we encourage you to read a range of sources on this subject for example by searching "aa" or "bb". (2) inserting general advertising to the effect "Everyone has a right to write stuff, but we encourage you to note who the author is, ask "what qualifies them" and "what motivates them". Be responsible for what you read and what you believe.

At best, censorship stops untrue rumours from circulating and causing harm. But the best never pertains. Because (1) you need to appoint censors or rely on



authorities that are as fallible and susceptible to bias as everyone else (2) neither they, nor anyone else, reliably knows what is untrue (3) even if they do, the censorship will be as effective in containing rumours as masks are at containing Covid (4) suppression of rumours undermines faith in the institution of freedom of speech (5) ...and creates unnecessary and painful non-rational fracture and distrust between those questioning authority and those upholding it which acquires greater prominence than the substantial matter at hand. (6) ...reduces the propensity of citizenry to engage in rational debate, encouraging instead reliance on authority (7) reduces the potential for Meta and peer tools to be venues for scientific publication, debate and exploration for those lacking access to labs, committees and publication in journals (8)

Given these harms, which are prevalent and significant, and given the effectiveness of open and rational debate of revealing truth and obstructing falsehood without help of censors, the benefits of a greater degree of free speech far outweighs the risks.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10734

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

I am unhappy that Meta so far have routinely taken down content that they see as misinformation. I believe in free speech which means allowing views which oppose the prevalent narrative

Full Comment

Free speech is vital to reclaim some sort of western democracy. Meta has an enormous responsibility in this regard. ALL content in regard to Covid, vaccinations, climate, abortion, wars, gender politics etc should be allowed. If **people don't like what they read they can easily 'unfollow'. We don't need or want to** be nannied or manipulated. Of all the proposals Meta have put forward, my preference would be for all content to be allowed but with a note or banner underneath with a warning.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10735

Public comment number

Europe

Region

Peter

Commenter's first name

Haken

Commenter's last name

English

Commenter's preferred language

None

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Any “science” that requires this sort of intervention is probable based on shakey foundations

Full Comment

Removal of content that is legal, but challenges an accepted orthodoxy, is itself an infringement on the right to free speech. It also indicates that the science itself is not secure because it needs to rely on a set of fascist rules and restrictions for its own security. This is the paradox contained in what you are proposing. Better to open up the debate.

Please cease and desist!

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10736

Public comment number

Europe

Region

David

Commenter's first name

Livermore

Commenter's last name

English

Commenter's preferred language

University of East Anglia

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

The crux is 'What is misinformation?' Do not call something 'misinformation' simply because it does not conform with the views of officialdom. Copernicus, Galileo, Semmelweis **were condemned as purveyors of 'misinformation'**. Yet all were right. Many government actions in response to the pandemic were at total variance with pre-pandemic planning, and were adopted on the hoof. They have caused vast collateral damage and did not stop the virus. Vaccines blunted but did not stop the virus. It should always have been legitimate to debate and criticise these policies and products. Any censorship should be minimal and limited to egregious nonsense, applied equally to government nonsense as well as to that from individuals.

Full Comment

See attached file

Link to Attachment

[PC-10736](#)

PAO 2022-01

Case number

PC-10737

Public comment number

Europe

Region

Jonathan

Commenter's first name

Smith

Commenter's last name

English

Commenter's preferred language

Kings School, Ely

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

The removal and blocking of "misinformation" during the Covid pandemic had a pernicious effect on open debate and, therefore, the truth.

Full Comment

As a school-teacher in the UK, teaching pupils up to the age of 18, I was appalled by the way Facebook and the media in general stifled any discussion which did not **reflect its own view of the "science"**. In fact, the scientific issues were only one part of this crisis: I wanted to be able to debate fully many of the ethical and political issues surrounding the imposition of restrictions. It proved impossible to do so; any productive debate required data and information from both sides of the issue. It soon became clear that many scientists were silenced and even respected publications like "The Spectator" had their articles banned from Facebook if they strayed from a very narrowly defined political narrative. At the time, I was teaching a Dystopian Literature module and the novels "1984" and "The Handmaid's Tale" to A-level. It became apparent to me (and to my brighter students) that the media (including social media, which was the main source of news for most of the cohort) was colluding with the government in ways that could have been taken straight from Orwell or Atwood. The scientific rationale for restrictions like lockdown, social distancing and mask-wearing was far from settled. They are all worthy of intellectual debate, both from a scientific angle and from an ethical and philosophical one. For instance, in relation to mask wearing, it was simple to show my students how the position of the WHO and every national government had abruptly changed in the summer of 2020, in the absence of any new ground-breaking data. The WHO admitted on BBC's Newsnight that the change had come due to political lobbying. Similarly, in relation to the vaccination programme, silencing any dissent had a disastrous effect on the willingness of my students to

think critically. They all became scared to even discuss alternative views. In the more astute ones, this had the effect of INCREASING distrust in public health bodies, the government and the press. As the New York Times has recently reported, this may end up being the legacy of Anthony Fauci and many of his peers around the world. <https://www.wsj.com/articles/dr-anthony-fauci-and-the-rule-of-experts-covid-national-institutes-of-health-public-health-11661205398> The truth has always required free and open debate. False gods, mendacious arguments and well-intentioned errors are only destroyed by having their shortcomings brought out into the open. In a time of national crisis, perhaps a warning label or a link to a government-approved site could be attached to items without media pedigree. However, on the whole, it's vital that Meta plays its part in allowing a free exchange of ideas. Only then can I teach my students to think and not just to swallow.

Link to Attachment

[PC-10737](#)

PAO 2022-01

Case number

PC-10738

Public comment number

Europe

Region

Christopher

Commenter's first name

Godwin

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Meta's comments are welcome but 'fact checkers' need to be treated with circumspection.

Their views are no basis for censorship decisions by Meta. There is too much contention to allow the level of certainty needed for censorship.

Full Comment

Meta's comments are welcome but 'fact checkers' need to be treated with circumspection.

Their views are no basis for censorship decisions by Meta. There is too much contention to allow the level of certainty needed for censorship.

The vast range and intellectual quality of Meta readers means they are best left to form their own judgements, albeit with information and comment from Meta.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10739

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

I feel that there should be no restrictions to what people post in discussions with others. There are few restrictions on what one can put in a letter and post or what one says to another in person or on the phone, fax or text and I think the same general principles should apply

Full Comment

Same as my summary

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10740

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

**Free speech supersedes all. 'Independent' fact checking cannot be wholly objective.**  
Everyone should be entitled to his or her view and be able to express it openly. The end.

Full Comment

Free speech with no censorship.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10741

Public comment number

Europe

Region

M

Commenter's first name

Forster

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Free speech should be paramount.

Full Comment

Who decides what is ‘**misinformation**’ As a scientist I had grave doubts about governments narrative and rules. Proper debate without propaganda and censorship is essential to get to the best outcome.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10743

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

**What should Meta's policy be on health-related and other forms of misinformation?**  
Simple: leave it alone. As the Supreme Court Justice Louis Brandies said almost 100 years ago about attempts to suppress false information:

Full Comment

We know from survey data that content that challenges left-of-centre views is more likely to be flagged as 'misinformation' or 'disinformation' and removed by social media companies than content that challenges right-of-centre views. According to a Cato Institute poll published on December 31st 2021, 35% of people identifying as 'strong conservatives' said they'd had a social media post reported or removed, compared to 20% identifying as 'strong liberals'. Strong conservatives were also more likely to have had their accounts suspended (19%) than strong liberals (12%). This clear political bias is one of the reasons suppressing so-called conspiracy theories is counterproductive. One obvious case-in-point is Facebook's suppression of the lab leak hypothesis in the first phase of the pandemic, which the Institute for Strategic Dialogue described as a 'conspiracy theory' in April 2020. This censorship policy was so counterproductive, that today even the head of the WHO is reported to believe this 'conspiracy theory'. Okay, that particular conspiracy theory is very probably true. What about when a hypothesis is clearly false, such as the claim that Joe Biden stole the 2020 Presidential election? That's still not a reason to censor it. That particular conspiracy theory, energetically promoted by Trump himself, played a part in the violent protests by Trump supporters that took place in Washington on January 6th 2020 and for that reason anyone sharing this theory on Facebook will see their posts instantly removed and they risk being permanently banned from the platform. But if the intention of suppressing this conspiracy theory

was to stop its spread, it hasn't worked. According to an Axios-Momentive poll from earlier this year, more than 40% of Americans don't believe Joe Biden won the Presidential election legitimately, a slight increase on the number expressing the same belief in 2020 in a poll carried out before January 6th. To be fair, I don't think the content moderators (or the algorithm designers) are deliberately acting in a partisan way to promote their favoured political candidates and causes – at least, not most of the time. Rather, they believe removing misinformation is good for the health of democracy – it will promote civic virtues like well-informed public debate and increase democratic participation and make ordinary people more responsible citizens. But the problem is that this idea is itself rooted in left-wing ideology, a point made by Barton Swain in a comment piece for the Wall St Journal earlier this year attacking the new Disinformation Governance Board: The animating doctrine of early-20th-century Progressivism, with its faith in the perfectibility of man, held that social ills could be corrected by means of education. People do bad things, in this view, because they don't know any better; they harm themselves and others because they have bad information. That view is almost totally false, as a moment's reflection on the many monstrous acts perpetrated by highly educated and well-informed criminals and tyrants should indicate. But it is an attractive doctrine for a certain kind of credentialed and self-assured rationalist. It places power, including the power to define what counts as 'good' information, in the hands of people like himself. So what should Meta's policy be on health-related and other forms of misinformation? Simple: leave it alone.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10746

Public comment number

Europe

Region

Gregor

Commenter's first name

Jackson

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Misinformation is subjective. Removing misinformation may end up removing information. Highlight it as 'debateable' information but allow the debated.

Full Comment

Misinformation is subjective. Removing misinformation may end up removing information. Highlight it as 'debateable' information but allow the debated.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10747

Public comment number

United States and Canada

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

The fact-checkers are not 'God' and subject to their own political views and prejudices, so suppressing one side of an argument is wrong.

Full Comment

**Censorship should almost never be allowed. It will lead to society's demise.** I think it horrible that Social media is censored especially by fact checkers who have no experience in certain subjects. I have not seen any censorship that happened in the past two years that could be supported by facts. It's only a narrative that is allowed. Do we now live inside Orwells 1984? That is exactly what it feels like.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10748

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Related to the use of algorithmic or recommender systems to detect and apply misinformation interventions, there seems to be some issues that impact their effectiveness. Precisely:

- users that create misinformation content may use altered terms or slang terms to bypass those algorithms
- there is no way for users to report content that they think may violate the Harmful Misinformation policy (only for reporting to the fact-checking program)
- content that was already fact-checked may be later reposted/reuploaded without being labelled properly (because the reposted content may bypass the algorithm)

Some technical improvements to user reporting experience may help with these issues.

Full Comment

This comment addresses:

\* "The effectiveness of social media interventions to address COVID-19 misinformation"

\* "The use of algorithmic or recommender systems to detect and apply misinformation interventions, and ways of improving the accuracy and transparency of those systems."

# Users can bypass Meta's algorithmic detection systems

Users that post misinformation content on Facebook/Instagram usually alter words such as "vaccine" -> "vaxx" or "COVID" -> "K0V1D" to bypass Meta's detection algorithms.

It is important to note that Facebook users that want to spread misinformation may have developed slang terms that are specific to their language and culture. For example, in Romania the following terms are used sometimes:

- \* "covrig" (Romanian word for "pretzel") to refer to "COVID" because it sounds like it
- \* "carcalac" (Romanian slang word that is usually used to refer to a bug/insect) to refer to "coronavirus" or "COVID"
- \* "dracin" (combination of "drac" (ro.) = devil/demon and "vaccin" (ro.) = vaccine) to refer to the vaccine
- \* etc.

I am not sure if Meta is aware of all these terms because, when they are used, Facebook doesn't even show the link to its COVID-19 Information Centre (1).

# How can users report posts violating the Harmful Misinformation policy?

It is nice Meta has a policy for harmful health misinformation and that they try to use algorithmic or recommender systems to detect and apply misinformation interventions.

However, there is no way for users to report content that they think violates this specific policy (at least for the Facebook web app, Facebook Android app and Instagram Android app).

There is a way to report (health) false information that goes to the third-party fact-checking program. When users use this option, they get the following message, with no further feedback on the report:

"Thanks for letting us know.

We'll use this information to improve our processes. Independent fact-checkers may review the content."

I think Meta should implement a new option in the Report menu to allow reporting content that may violate the Harmful Misinformation Policy. Maybe it should also allow users to select or write an optional free-text comment about why they think the content violates the policy.

# The Fact-checking program

Content that was once checked by a fact-checker may be reposted/reuploaded and get viral again. Sometimes, Facebook does not seem to correctly identify that the content was already fact-checked by a fact-checker and label it properly. This may happen, for example, when:

- \* the video is reuploaded having a different resolution
- \* a screen playing the video is recorded by a smartphone camera and then, the recording is uploaded
- \* the video is slightly edited (for example, by adding subtitles or a watermark)
- \* the audio from a video content is extracted
- \* a screenshot of the "previous" post is posted
- \* the image is cropped in such a way that it is no longer detected by the algorithmic system
- \* etc.



Reporting the post via the report menu does not seem to work properly. In reality, it is much more effective to contact the fact-checker directly via e-mail than to report the content through the Facebook application's report menu.

As a technical solution, I think Meta could add an optional field to the form through which users report content. This optional field may accept an URL/link to the fact-checking report (if one already exists). Meta and/or the fact-checker may review the report to validate that it is in fact a repost of an already fact-checked content.

#### # References

(1) COVID-19 Information Centre, [https://www.facebook.com/coronavirus\\_info/](https://www.facebook.com/coronavirus_info/)

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10749

Public comment number

Europe

Region

james

Commenter's first name

hall

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Interventions to address COVID-19 misinformation are increasing distrust in media platforms because the nature of those interventions have been shown on occasion to be biased and unfair. The fact-checkers have been shown to be compromised by their own vested interests eg 'Fullfact' and their source of income eg from pharmaceutical interests.

Full Comment

For the reasons described in the summary and in the interest of freedom of expression there should be no censorship of covid-19 discussion and comment. All sane adults understand that social media content can be untrue and inaccurate. It is up to users to undertake their own fact-checking should they wish to do so.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10750

Public comment number

Europe

Region

Flynt

Commenter's first name

Marco

Commenter's last name

English

Commenter's preferred language

Marc Hayden Photography

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Im leaving every Meta platform as I will not be part of any platform that bullies, lies, and pushes an incorrect, and unbalanced narrative. If someone disagrees, they are banned? What a farce.

Full Comment

Over the last 2-3 years, people have not been able to question the government or ruling bodies. Apparently, they know best. Yet they don't. People are dying, because they are not getting the real stories, or the real news. They simply get one narrative, and if anyone disagrees, they get shadow-banned, blocked, or punished. Many people are aware of this, and are rightly ditching the platforms.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10751

Public comment number

United States and Canada

Region

Jenny

Commenter's first name

Liu

Commenter's last name

English

Commenter's preferred language

Asian Americans Advancing Justice |  
AAJC

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

On behalf of Asian Americans Advancing Justice | AAJC, we are writing to encourage Meta to continue removing COVID-19 misinformation under its existing harmful misinformation policy. We also recommend the following additional steps to bolster protections:

- Ensure equitable enforcement of policy across all languages, including increased content labels and third-party fact checkers; and providing fact checkers and other monitors with training and contextualization of localized issues, geographical dialects and vernacular, and cultural nuances.
- Grant independent researchers additional data access to facilitate analysis of the efficacy of various enforcement policies.

Full Comment

August 25, 2022 RE: Policy Advisory Opinion Request: Removal of COVID-19 Misinformation On behalf of Asian Americans Advancing Justice | AAJC, we are writing to encourage Meta to continue removing COVID-19 misinformation under its existing harmful misinformation policy. **As outlined by Meta's explanation of its own policies, the 80 distinct false claims that currently warrant removal are those that "contribute to the risk of real-world harm."** Unfortunately, false claims continue to perpetuate material harm on communities. Millions of Americans still refuse to take life-saving vaccines, leading to countless unnecessary COVID-19 fatalities. Hundreds chose instead to take an antiparasitic drug for animals, resulting in overdoses and even death. It would be grossly negligent and even actively harmful for Meta to downscale imperative interventions—even if it is demoted or labeled with a fact check—despite knowing first-hand and publicly

acknowledging the known dangers of such content. Summary In the midst of a global pandemic that has killed over six million people worldwide to date, including over one million Americans Meta should be prioritizing and bolstering support for COVID-19 misinformation monitoring and moderation rather than scaling back efforts to protect users from posts containing misinformation about COVID-19. Moreover, Meta should adopt additional steps to bolster protections: Ensure equitable enforcement of policy across all languages, including increased content labels and third-party fact checkers; and providing fact checkers and other monitors with training and contextualization of localized issues, geographical dialects and vernacular, and cultural nuances. Grant independent researchers, including individuals representing human and civil rights interests with localized and community-based expertise, additional data access to facilitate analysis of the efficacy of various enforcement policies. (Detailed recommendations below.)

About Asian Americans Advancing Justice | AAJC Asian Americans Advancing Justice | AAJC is dedicated to civil and human rights for Asian Americans and to promoting a fair and equitable society for all. We provide the growing Asian American community with multilingual resources, culturally appropriate community education, and public policy and civil rights advocacy. Our mis- and disinformation work focuses on how mis- and disinformation targeted at the Asian American community is distinct from more “mainstream,” largely English-language mis- and disinformation, as well as how bad actors may weaponize anti-Asian mis- and disinformation to foster xenophobia and hostility against Asian Americans .

Background on the effects of the pandemic on Asian Americans. The Asian American community has been hit hard by this pandemic in many ways. While Asian Americans have high vaccination rates broadly, aggregate figures hide disparities within the Asian American community among different ethnic groups as well as vaccine hesitancy stemming from misinformation spread on platforms like Facebook and Instagram. Rampant online misinformation about COVID-19 spreading within or at the expense of the Asian American community contains falsehoods and dangerous advice such as: Idea that the vaccines contain microchips, cause cancer, or lead to widespread deaths Recommending the use of dangerous vaccine alternatives like ivermectin or ineffective home remedies like consuming boiled garlic Scapegoating Asian Americans as responsible for bringing COVID-19 to the United States Idea that the Chinese Communist Party purposefully created COVID-19 and resulting vaccines to harm the rest of the world and control the global population Falsehoods about the efficacy of vaccines or downplaying the significance of COVID-19 are harmful to Asian Americans and put the health and wellbeing of our communities at risk. At the same time, in a moment when hatred born out of xenophobia and the spread of falsehoods about the virus’ origin have resulted in an alarming uptick in violence and harassment targeting Asian Americans, any misinformation or conspiracy theories about where the virus originated are also dangerous to Asian Americans. Recommendations Ensure

equitable enforcement of policy across all languages, including increased content labels and third-party fact checkers; and providing fact checkers and other monitors with training and contextualization of localized issues, geographical dialects and vernacular, and cultural nuances. While the development of vaccines and other treatments have made COVID-19 far less deadly than in the earliest days of the pandemic, thousands of individuals around the globe are still dying from COVID-19 every day. Furthermore, as noted in the full Public Advisory Opinion, the consequences of this dangerous disease are playing out differently across the globe. Whereas wealthier nations like the United States now have abundant public health resources like vaccines and treatments at their disposal, unfortunately, other parts of the world where these resources are not readily available still struggle to handle the virus. These also happen to be places where languages other than English are **spoken. Several studies** (Facebook's Content Moderation Language Barrier, 'Facebook has a blind spot': why Spanish-language misinformation is flourishing), including the Oversight Board's own annual report, **have underscored how Meta's** content moderation efforts are far less effective or even sometimes nonexistent in languages other than English. See Appendix A for examples of non-English content that contains no labels at all or are simply marked as being related to COVID-19 with **no additional warnings or fact checks. Under Meta's current COVID misinformation** policies, each of these posts contain content that falls under one of the 80 categories warranting removal... [Full text of comment in attachment]

Link to Attachment

[PC-10751](#)

PAO 2022-01

Case number

PC-10753

Public comment number

Europe

Region

Richard

Commenter's first name

North

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

I have stopped using Facebook as I consider it a partisan force. I also believe it should be split up and its component parts fined heavily if they repeat the disgusting policies of the last 2.5 years

Full Comment

I have stopped using Facebook as I consider it a partisan force. I also believe it should be split up and its component parts fined heavily if they repeat the disgusting policies of the last 2.5 years

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10754

Public comment number

Europe

Region

Michael

Commenter's first name

Craig

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

I want to share with you my thoughts regarding my experience of FB censoring my posts. These were posts of a scientific and rational nature that I wanted to share on my personal page with my friends. I believe that FB is seriously interfering with the fundamental human right to freedom of expression, speech and ideas amongst adults

Full Comment

My input addresses your following subject: "The fair treatment of users whose expression is impacted by social media interventions to address health **misinformation, including the user's ability** to contest the application of labels, warning screens, or demotion of their content." I want to share with you my thoughts regarding my experience of FB censoring my posts. These were posts of a scientific and rational nature that I wanted to share on my personal page with my friends. The complete inability to be able to discuss and confront a person (or AI algorithm) who has decided that my post was 'misinformation' or 'misleading', is infuriating and demeaning. This leaves me with a feeling of disgust and being disrespected by FB. I believe in human freedom of expression, speech and ideas amongst adults. As long as there is no abuse of children involved, or incitement towards deadly intent towards other people, then government, social media, or any media, have no business interfering in private communication between adults. I think FB needs to ask itself why it believes it has the right to censor what adults choose to read or think. Why it should be trying to tell them that some experienced scientists are correct, while other experienced scientists are spouting 'misinformation'. That is surely for the domain of science to determine. What mature adults do, is read both sides and then make their minds up. Yes, some will



indeed only read one side of the argument, but it is surely not the concern of FB to teach immature adults what to think. That's what human life and experience is for. If FB decides that they DO have the right to interfere in communications between adults, and to influence and coerce their opinion on various matters and world issues, then they should make this abundantly clear to those who use the platform, in extremely clear language and in prominent display, so they know exactly what they are signing up to. For example: "By using the FB platform, you accept that FB has the right to censor or delete any of your posted or shared content that it does not agree with for any reason. This includes any valid scientific fact, or philosophical and political opinion." Be bold. Be clear. Make your choice as to where you stand in the world. Alternatively, you could add the following: "FB apologizes for the censorship it has imposed in recent years, and now fully recognizes that this was fundamentally the wrong thing to do in a free society. From this point on, except for child abuse, human trafficking, incitement towards violence etc., we have ended all censorship on FB, and declare that we will never do such a thing again." You see, my strong feeling is that our world now stands at a crossroads, and it is a very simple choice now for each of us, and FB, to decide and make: Do we agree that in a free society, adults must be free to choose what they read and think, without any interference and censorship of that freedom whatsoever? Whether it be from social media, authoritative bodies such as governments, state and private institutions, or businesses? Or, do we accept that humanity should NOT live in a free society, and that all opinions should be censored and altered to conform to the prevailing consensus decided by those authoritative bodies? I conclude my thoughts, and trust you will find them useful in your coming deliberations.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10756

Public comment number

United States and Canada

Region

Keenan

Commenter's first name

Chen

Commenter's last name

English

Commenter's preferred language

Information Futures Lab at Brown  
University's School of Public Health

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

Recommendations can not be made from the outside of a black box. To solicit recommendations about the **continuation of Meta's COVID-19** policy without Meta providing more data and evidence showing how its policy has been effective and ineffective when it comes to COVID-19 misinformation amounts to a gross missed opportunity. Therefore, our recommendation focuses exclusively on the need for Meta to increase its transparency around its internal evaluations of misinformations and for it to provide greater access to its data in order for outside experts to make recommendations and build interventions that are well informed.

Full Comment

**The Information Futures Lab at Brown University's School of Public Health** welcomes this call for public comment on Policy Advisory Opinion 2022-01, **addressing Meta's request for guidance on its COVID-19** misinformation policy. What follows is our response to the most significant area of input solicited by the **Oversight Board: the need for increased transparency of Meta's interventions and of raw user data that provides potential for greater insight. Principles and best practice to guide Meta's transparency reporting of its interventions in response to health** misinformation. There is no easy solution to the ever-evolving challenges misinformation poses to public health and safety. The COVID-19 pandemic is not the first significant health issue about which misinformation floods social media platforms, including Facebook and Instagram, and it will not be the last. As Meta continues to find its way toward a solution to misinformation that both honors the principles of free speech while limiting the abuses that accompany it, transparency should be its guiding principle. Although Meta has implemented interventions

designed to limit the negative effects of misinformation, its transparency around the effectiveness of such tactics falls short. Meta should frequently publish the results of its own investigations into the effectiveness of removing content, working with third-party fact checkers, and labeling content deemed potentially harmful. Not only would this assist our ability to make stronger recommendations on its content moderation policies, but it also may increase the level of trust among users, **which has significantly declined due largely to Meta's lack of transparency around its use of user data, and the mental health impacts resulting from how its algorithms push content.** This is an issue that has been recently addressed by the Oversight Board in the context of political information and it should also be considered in the context of health information. Beyond the publication of its own investigations, Meta should work more openly with researchers from a wide range of disciplines. They can provide desperately needed context and expertise in the design and evaluation of interventions that are tailored for users around the world who interact **with Meta's products in a range of depth, through different cultural lenses, and** under varying economic and political environments. For interventions to be trusted and effective, Meta must allow researchers access to key raw data about how interventions are deployed and how users behave after encountering them. In addition to providing data access to institutions like the Information Futures Lab, whose research centers on creating healthier information spaces, Meta should consider re-establishing its relationship with CrowdTangle, the data analytic tool that many academics, journalists, and activists have long relied on to study misinformation and its impacts. Meta should also expand existing programs such as Ad Library and the Facebook Open Research and Transparency program, and incorporate COVID-19 and health misinformation-related data in these datasets. We know that COVID-19 continues to plague all parts of the world as variants arise and misinformation undermines vaccine efforts,. Because one solution cannot fit all **users of Meta's products, a nuanced understanding of the value of each type of** intervention could go far in limiting the negative health and societal impacts of a Wild West of online content while honoring the rights of individuals to speak their minds and share information. With greater transparency efforts in place, the effectiveness of a wide range of interventions (friction interventions, education interventions, content moderation, etc.) can be better understood and prioritized.

\_\_\_\_\_ For more information, please contact  
informationfutureslab@brown.edu.

Link to Attachment

[PC-10756](#)

PAO 2022-01

Case number

PC-10758

Public comment number

United States and Canada

Region

Kayla

Commenter's first name

Gogarty

Commenter's last name

English

Commenter's preferred language

Media Matters for America

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

**The Board has asked respondents for comments on Meta's COVID-19**

misinformation policies and recommendations on whether Meta should continue removing and/or labeling content on these grounds. If anything, the prevalence of COVID-19 and health misinformation on Meta's platforms and the company's failure to consistently and adequately enforce its policies against such misinformation warrants continued implementation and improved enforcement of the policies. Even when accurate information is available on Meta's platforms, it is often buried by the sheer volume of inaccurate and harmful content – typically from right-leaning pages – that the company has been unable to control.

Full Comment

**The Board has asked respondents for comments on Meta's COVID-19**

misinformation policies and recommendations on whether Meta should continue removing and/or labeling content on these grounds. If anything, the prevalence of COVID-19 and health misinformation on Meta's platforms and the company's failure to consistently and adequately enforce its policies against such misinformation warrants continued implementation and improved enforcement of the policies. The development of vaccines and therapeutic treatments and the evolution of disease variants mean that COVID-19 is less deadly – just as Meta has claimed. Yet, there are still high levels of transmission in communities across the U.S. and people who are at risk of getting very sick and/or developing long-term effects if they contract COVID-19. Throughout the pandemic, health misinformation played a role in how individuals responded to preventative measures, such as mask wearing, and COVID-19 vaccines. In fact, several studies have found a negative

correlation between exposure to misinformation and protective behaviors. And some experts agree, including Food and Drug Administration Commissioner Robert Califf, who recently said that he believes “**misinformation is now our leading cause of death.**” With more than 3 billion people using its platforms and its vast societal influence, Meta should be dedicated to minimizing the risk of harm from misinformation. Even when accurate information is available on Meta's platforms, it is often buried by the sheer volume of inaccurate and harmful content – typically from right-leaning pages – that the company has been unable to control. New data reveals the prevalence of COVID-19 misinformation among right-leaning Facebook pages as different viral strains spread across the U.S. Meta has struggled to address COVID-19 misinformation across both Facebook and Instagram – despite its policies against such misinformation – as different features (such as Facebook Groups and Events and Instagram stickers) and post types, including videos and comments, have been exploited to spread harmful misinformation. To assess the prevalence of COVID-19 misinformation on Facebook, Media Matters compiled and analyzed nearly 2.9 million posts related to COVID-19 from news and politics pages since January 1, 2020, and found that the ratio of posts with COVID-19 misinformation from right-leaning pages to posts related to COVID-19 from all news and politics pages increased as new variants spread across the U.S. For right-leaning pages, the ratio of posts with COVID-19 misinformation to posts about COVID-19 more generally, increased from 3.4% during the height of the original COVID-19 outbreak and alpha strain to over 5.7% during the omicron strain. When compared to posts about COVID-19 from all news and politics pages, the ratio of posts with COVID-19 misinformation from right-leaning pages increased from over 0.5% during the height of the original strain and alpha variant to over 1% during the omicron strain. The ratios of interactions earned on the posts followed a similar pattern, as shown in the chart. Notably, posts with misinformation from right-leaning pages actually earned more interactions on average across strains than posts about COVID-19 from either right-leaning pages or all news and politics pages, as shown in the chart.

Original COVID-19 strain and alpha variant: Between January 1, 2020, and April 30, 2021 – when the original COVID-19 strain and alpha variant were the dominant strains in the U.S. – right-leaning pages posted nearly 11,400 posts with COVID-19 misinformation and earned over 47 million interactions on the posts, or roughly 4,100 average interactions per post containing COVID-19 misinformation. During the same time frame, there were nearly 2.1 million posts about COVID-19 from all U.S. news and politics pages that earned nearly 3.4 billion interactions, or over 1,600 average interactions per post. Right-leaning pages accounted for almost 340,000 of the posts about COVID-19, which earned over 804 million interactions, or nearly 2,400 average interactions per post.

Delta strain: Between May 1 and November 30, 2021 – when the delta variant was the dominant strain in the U.S. – right-leaning pages posted nearly 3,600 posts with COVID-19 misinformation and earned nearly 7.7 million interactions on the posts, or over 2,100 average interactions per post

containing misinformation. During the same time frame, there were over 460,000 posts about COVID-19 from all U.S. news and politics pages that earned over 501 million interactions, or nearly 1,100 average interactions per post. Right-leaning pages accounted for roughly 73,000 of the posts about COVID-19, which earned nearly 119 million interactions, or over 1,600 average interactions per post.

Omicron strain: Between December 1, 2021, and August 19, 2022 – when the omicron variant was the dominant strain in the U.S. – right-leaning pages posted over 2,900 posts with COVID-19 misinformation and earned over 4.5 million interactions on the posts, or over 1,500 average interactions per post containing misinformation. During the same time frame, there were nearly 285,000 posts about COVID-19 from all U.S. news and politics pages that earned over 236 million interactions, or over 800 average interactions per post. Right-leaning pages accounted for over 51,000 of the posts about COVID-19, which earned nearly 61 million interactions, or nearly 1,200 average interactions per post. Increased prevalence of COVID-19 **misinformation is due in part to Meta's failure to effectively** enforce its current policies. Removing them would be even more disastrous.

**Despite Meta's robust COVID-19 policies**, misinformation has continued to spread, as the company relies on an ineffective labeling system and haphazard enforcement that allows the misinformation to spread. Meta allowed misinformation to prevail through loopholes, such as the cross-check system...

Link to Attachment

[PC-10758](#)

PAO 2022-01

Case number

PC-10762

Public comment number

United States and Canada

Region

Jennifer

Commenter's first name

Granick

Commenter's last name

English

Commenter's preferred language

American Civil Liberties Union  
Foundation

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

[Please utilize this revised PDF version of the ACLU Speech, Privacy & Technology Project's final comment re: PAO 2022-01. A former version was submitted missing key changes.]

Today, the ACLU supports Meta taking one of the less restrictive approaches to removal of COVID-19 misinformation. Disputed scientific claims are an area where more speech is preferable to censorship. The scientific debates that have evolved society's understanding of COVID-19 highlight the difficulty of determining accuracy as public health crises unfold and could not have happened if contrarian assertions were summarily shut down. Ultimately, the best approach is to contextualize false claims and create tools for persuasion, rather than removing content.

Full Comment

[Please utilize the attached revised PDF version of the ACLU Speech, Privacy & Technology Project's final comment re: PAO 2022-01. A former version was submitted missing key changes.]

Link to Attachment

[PC-10762](#)

PAO 2022-01

Case number

PC-10763

Public comment number

United States and Canada

Region

Will

Commenter's first name

Duffield

Commenter's last name

English

Commenter's preferred language

Cato Institute

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

**Meta's Covid misinformation policies represent a state of exception, a temporary suspension of, or exception to, the rule of law, dictated by the sovereign in response to an emergency. This Policy Advisory Opinion is an opportunity to prevent Meta's exceptional measures from becoming permanent. The Oversight Board should not allow this opportunity to pass. Continuing to allow the normal order of third-party fact checking to be supplanted by top-down truth arbitration saps third-party fact checking of legitimacy, encourages censorship creep, irresponsibly empowers fallible authorities, and implicates Meta in their failures. A permanent state of exception would be bad for Meta's platforms' governance.**

Full Comment

Policy Advisory Opinion 2022-01 Public Comment Will Duffield, Policy Analyst, Cato Institute **Meta's Emergency** **Meta's Covid misinformation policies represent a state of exception, a temporary suspension of, or exception to, the rule of law, dictated by the sovereign in response to an emergency. This Policy Advisory Opinion is an opportunity to prevent Meta's exceptional measures from becoming permanent.** The Oversight Board should not allow this opportunity to pass. Continuing to allow the normal order of third-party fact checking to be supplanted by top-down truth arbitration saps third-party fact checking of legitimacy, encourages censorship creep, irresponsibly empowers fallible authorities, and implicates Meta in their failures. A permanent state of exception would be bad for **Meta's platforms' governance. Even before Covid, Meta retained ultimate control of its platforms' governance.** However, it formalized and standardized its content moderation by promulgating platform policies, moderation systems, and community standards.



These community standards act as law for its platforms. One such system is Meta's third-party fact checking program. Instead of resolving factual questions itself, Meta maintains a stable of third-party fact checkers – mostly journalistic institutions – which can choose to evaluate and label disputed truth claims on Meta's platforms. Meta actions labeled content but does not decide which content is labeled false. This allowed it to avoid becoming an "arbiter of truth". However, in response to Covid-19, Meta superseded this system with an alternative method for dealing with disputed factual claims about the novel virus. Meta has identified 80 distinct false claims about Covid-19 that it removes on sight. While Meta describes its process of false claim identification as "rely[ing] on reports and official statements from credible health organizations, such as the WHO and certain governmental health organizations", Meta decides which content includes these false claims. Thus, for the past two years, Meta's normal rules for handling factual disputes have, in this area, been supplanted by exceptional measures. Indeed, in its Policy Advisory Opinion Request, Meta describes the adoption of its Covid misinformation policy as an "extraordinary step" "However, in January 2020, based on the rapidly unfolding COVID-19 pandemic, we took the extraordinary step of removing entire categories of misinformation about the pandemic from our platforms." If Meta maintains its present state of exception indefinitely, allowing the Covid emergency to permanently change its content moderation paradigms, emergencies will become a means of altering platform policy rather than extraordinary protective measures. These measures reified Meta's sovereignty at the expense of its moderation policies' legitimacy. After all, in the classic Schmittian formulation, "Sovereign is he who decides on the exception." This legitimacy sap intensifies as these measures are maintained. Whatever we think of normal policies unsuited for a moment of emergency, what are we to think of their apparent continued unsuitability even as the moment of crisis passes? Creep and Permanence Layering extraordinary measures on top of the normal rules not only delegitimizes the normal order, it also tends to make the emergency measures permanent. The longer exceptions persist, the stickier they become. They gain constituencies, status quo bias begins to work in their favor, and they are increasingly viewed as integral parts of the policy apparatus, rather than exceptions to it. This is not a problem unique to Meta or social media governance. Pragmatic or temporary government necessities have a long track record of being used to permanently alter or circumvent the rule of law. In Napoleonic France, interwar Italy, Weimar Germany, and post-9/11 America temporary-ultimately-permanent emergencies permanently altered the rule of law. What were once viewed as extraordinary measures, such as demanding travelers remove their shoes at the airport, or indefinitely detaining foreign nationals suspected of terrorism, have become ordinary. 21 years after Richard Reid's failed shoe-bombing attempt, we still remove our shoes as we pass through airport security, and 36 prisoners remain at Guantanamo Bay. Although the restrictions of liberty produced by Meta's Covid

misinformation policy are not nearly as severe, they represent just as drastic a turn away from Meta's prior commitments to refrain from making determinations of fact and fiction. Although Meta has taken emergency steps to remove health disinformation twice in the past, these interventions were geographically limited responses to particular rumors, minimizing opportunities for mission creep and marking them as clear exceptions to the global policy norms. In contrast, the current exception applies globally, and therefore runs a greater risk of being conflated with the normal order of moderation. One middle-ground solution might be to preserve emergency Covid misinformation removal policies in locales surpassing some case-rate threshold, making them a local exception rather than the norm. As well, the breadth of claims included in the current exceptional policy makes it particularly vulnerable to scope-creep. The policy has already expanded to cover non-covid-specific claims about vaccines, which might discourage use of the Covid vaccine, and 5G anxieties that are often co-mingled with Covid misinformation. Fallibility The authorities that Meta relies upon are not infallible. Treating their official advice as a source of absolute truth threatens to enforce error at scale and quash vital dissent. It also puts Meta in the awkward position of having to override health officials' judgement when it becomes clearly erroneous. In May 2021, Meta rescinded its nearly year and a half long prohibition on claims that Covid-19 was man-made or manufactured after a Wall Street Journal repor

Link to Attachment

[PC-10763](#)

PAO 2022-01

Case number

PC-10764

Public comment number

Latin America and Caribbean

Region

Pablo

Commenter's first name

Medina Uribe

Commenter's last name

English

Commenter's preferred language

Centro Latinoamericano de  
Investigación Periodística – CLIP

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Meta should be more transparent with its disinformation interventions data, it should be more clear with the labels of its 3PFC Program, and it should coordinate better all its different interventions, not only internally, but also with fact-checkers in the program.

Full Comment

Pablo Medina Uribe Disinformation Investigations Editor Centro Latinoamericano de Investigación Periodística – CLIP I believe the Oversight Board should take into account regional differences in how both information and disinformation travels around the world. As someone who has worked on fact-checking and researching disinformation for over five years — and who worked on the Third-Party Fact-Checking Program during my time as Colombiacheck's editor-in-chief —, I see three main points about the peculiarities of the Latin American media landscape that the Board should take into account: First, in most of the countries in the region, Meta's products are the main way in which people are informed. Second, there is a growing distrust in the region towards the news media and experts (and some coordinated campaigns on Meta's products are partly responsible for this). Third, many scammers take advantage of the first two points to sell fake cures, usually disguising their language to not be removed by Meta's policies. Therefore, my recommendations are as follows: Deleting content further fuel distrust in institutions, as it can be misconstrued as fodder for new conspiracy theories. What's more, a policy of deleting content can easily target non-violating content. Studies have shown that the use of labels can reduce the shares of disinformation posts, but studies also show that labelling, under its current format, is still not enough. Studies about what interventions work and why are still hard to come by, and this is in part

due to how secretive Meta is about this data. I would suggest sharing more information with researchers, as this can be a guiding light for all professionals in this field. Still, I think there are some measures that can be taken now. During my time taking part of the 3PFC Program, I constantly had to deal with confused users who did not understand who was fact-checking content on Facebook and Instagram, why were they fact-checking it, or what was the extent of the authority that fact-checking outlets had under this program. Oftentimes fact-checkers were accused of shutting down Facebook pages or profiles, or of being responsible of other Facebook interventions, such as deleting content, or applying other labels unrelated to the 3PFC Program. I have strongly recommended Facebook employees in other settings, and I also strongly recommend here that Meta should clarify this program to their users in their labels. Most Facebook users are not journalism professionals or disinformation researchers and are unaware of this program. So this explanation should be more obvious (with larger fonts, for example), right on the labels that are applied. Other Meta interventions have been implemented without consulting fact-checkers, and seemingly without connection to the Meta team in charge of the disinformation-combatting programs. This creates a mish-mash of possibilities that confuses users and forces journalists to explain Meta programs they're not responsible for. A more streamlined approach should be implemented, in which all interventions are coordinated, and are easy to explain to users. The confusion that results from this lack of clarity has even resulted in death threats to journalists, especially in Brazil, but so far we have seen little effort from Meta to solve it. Furthermore, I believe that the program should be expanded in Latin America, where there are still countries without a partner, despite there being capable fact-checking organizations. Finally, I think a new set of policies should be created for scam accounts selling fake cures, which have been growing since the pandemic. While some of these were deleted at the height of the "Infodemic," many have returned, by creating new pages, without much consequence. The 3PFC labels might not be enough, as these pages don't necessarily share disinformation but, through coded language, sell products that do not work as advertised. I would suggest creating special labels that pop up whenever certain terms (such as "chlorine dioxide" or "MMS," for example) are brought up, warning about the dangers of these products.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10766

Public comment number

Europe

Region

Peter

Commenter's first name

Kirk

Commenter's last name

English

Commenter's preferred language

ISA

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

Dear Facebook, Anything goes - it's called Freespech - No censorship, none, zero

Full Comment

Dear Facebook, Anything goes - it's called Freespech - No censorship, none, zero

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10767

Public comment number

Europe

Region

Don

Commenter's first name

Duncan

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

I simply do not think you have any business censoring any views.

Full Comment

I simply do not think you have any business censoring any views.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10768

Public comment number

Europe

Region

Bruce

Commenter's first name

Luffman

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

I do not believe that there should be any removal of material in the public domain unless it falls into areas that are covered by existing legislation that would make it illegal.

Full Comment

I do not believe that any information or comment should be removed that has been exhibited in the public domain. This is based on the understanding that no illegal statements have been presented that would engender illegality through comments and information that is racial orientated; sexual including mysogyny; anti religious belief; equality as defined by the ECHR and including disabled rights and profane. Whether someone disagrees with the comments made because their 'feelings' or 'emotions' might be compromised, is not grounds for any censorship or 'take-down' of the comments because that is against Free Speech and does not constitute a crime.

All legitimate comment that has proffered by medically supported writers should be acceptable without constraint and just because it may be against the edicts from Government that does not make it wrong or unacceptable,

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10770

Public comment number

Europe

Region

Tamsyn

Commenter's first name

Pickett

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

The censorship situation has made me too scared to engage anymore on the Facebook platform - in case I inadvertently lose my account for saying things that I think are palpably, obviously true

Full Comment

I would however like to say that I have almost entirely stopped going on to Facebook over the past two years. I feel, basically, too frightened to engage with its content anymore. The level of censorship gives me gut churning concern. I am so worried about losing my account, with all of its history, so I would rather just not post anything or engage at all. Specifically with regard to the stance taken on lockdown **“misinformation”, where did Facebook have any right to censure legitimate concerns raised as to its actual effectiveness or it’s potential/likely long term harms?** Within 3 weeks it was blindingly obvious what the repercussions would be and yet **voicing this, however reasonably, was not permitted.** As for the vaccines... I was very ill with Wuhan covid in March 2020 and it took me a significant period of time to recover. A year later I had a first dose of AZ and was seriously ill for 4 months. All my long term covid symptoms came back and far more besides. It was an awful time and I had no idea if I would get better. I had two small kids to look after and **next to no help.** My family are all miles away. **It’s been 18 months now and my heart has still not returned to normal, nor has my eyesight.** However, I can’t write about any of this on Facebook. Somehow it is not allowed to be true. Somehow I, my very self, have become **“misinformation “** overnight. I don’t know how to put into words how lonely and unjust and frustrating and upsetting it has been. Anyway, at this point I stopped going on to Facebook altogether. And some time after that I sort of withdrew from things altogether. I hardly see anyone anymore outside of the school



run etc. I no longer feel I can speak about anything real anymore. There's one thing I want to end on. All this has been done in the name of somehow maintaining faith in vaccines per se. It has had the completely opposite effect for me. My trust has evaporated that any balanced information remains available online. I have to imminently decide whether to give my children the polio booster and I just don't know what to do. I wouldn't have hesitated before. But now I do not believe that an honest appraisal of the risk/benefit ratio would be available on the internet - certainly not on Facebook!! - and I think it must be safer not to give it to them.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10772

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

free speech and different opinions, whether those opinions are right or wrong, should never be censored. Censorship implies an element of truth in what is being censored.

Full Comment

In a democratic society, all opinions should be valid in order to stimulate debate, until one side of an argument is able to show evidence that what they claim has truth. Free speech and differing opinions should be valued and cherished. Censorship implies an element of truth to an opinion, or there would be no censorship in the first place.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10773

Public comment number

Europe

Region

Anthony

Commenter's first name

Blighe

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

"You responded that you are sharing your perspectives on behalf of an organization"  
- no, I did not, the form is faulty.  
If it is illegal, take it down and inform the poster of the relevant law, otherwise leave it be.

Full Comment

If the user generated content is legal in the jurisdiction in which it is views then no interference is warranted.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10775

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Meta should not remove or block or in anyway edit anyone's posts. All opinions are personal and subjective. Accepted 'facts' are always changing and need constant challenging, review and modification.

Full Comment

Lord Sumption expressed it very well when he said:

All statements of fact or opinion are provisional. They reflect the current state of knowledge and experience. But knowledge and experience are not closed or immutable categories. They are inherently liable to change. Once upon a time, the scientific consensus was that the sun moved around the Earth and that blood did not circulate around the body. These propositions were refuted only because orthodoxy was challenged by people once thought to be dangerous heretics. Knowledge advances by confronting contrary arguments, not by hiding them away. Any system for regulating the expression of opinion or the transmission of information will end up by privileging the anodyne, the uncontroversial, the conventional and the officially approved.

And as Toby Young pointed out:

To illustrate this point, take Meta's own record when it comes to suppressing misinformation. In the past two-and-a-half years, you have either removed, or shadow-banned, or attached health warnings on all your social media platforms to any content challenging the response of governments, senior officials and public health authorities to the pandemic, whether it,Äôs questioning the wisdom of the lockdown policy, expressing scepticism about the efficacy and safety of the Covid vaccines, or opposing mask mandates. Yet these are all subjects of legitimate scientific and political debate. You cannot claim this censorship was justified

because undermining public confidence in those policies would make people less likely to comply with them and that, in turn, might cause harm, because whether or not those measures prevented more harm than they caused was precisely the issue under discussion. And the more time passes, the clearer it becomes that most if not all of these measures did in fact do more harm than good. It now seems overwhelmingly likely that by suppressing public debate about these policies, and thereby extending their duration, Meta itself caused harm.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10776

Public comment number

Asia Pacific and Oceania

Region

Peter

Commenter's first name

Murphy

Commenter's last name

English

Commenter's preferred language

La Trobe University

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

No organisation can determine “misinformation” let alone scientific truth. The desire to do so is a form of megalomania.

Full Comment

The history of science not least of all “public health” science is riddled with error, irrationality, vested interest, falsehood, crank theories, untruths, and periodic absurdity. Science does advance but it does so slowly and produces a lot of junk science along the way. META ignored this basic fact about the history of science when it engaged in extensive censorship of critics of official COVID policies. Many of the criticisms of official policies in retrospect have proved to be true—and many of the propositions made by public health authorities have proved to be erroneous. No, lockdowns did not prevent the transmission of the virus nor did masks nor did vaccines. Serious scientists argued this from day one and risked or incurred META censorship. It is delusional on META’s part to think it can determine what is “misinformation” or to think that “harm” is a simple category that it can translate into a rule. Costs and benefits of public policies are complex and many-sided, especially health policies. Public health bureaucracies have a poor record of juggling costs and benefits, and a poor record of understanding the complex causal nature of population-scale bio-medical phenomena—not least of all viruses. Bureaucracies deal in rules and directions, and “the science” they rely on often can be pretty simple-minded—and also politicised. Given these conditions, censorship of contrary opinions or judgments is anti-science. Science requires persons to point out the flaws of official or orthodox reasoning, to evaluate the adequacy of models, to suggest countervailing factors, and to question one-dimensional models of causation. META’s policies on “misinformation” and “harm” are anti-scientific and obsequious to the agendas of the government of the day. META’s policies need a

major revision in order to permit the utmost freedom of intellectual expression. A clear and unequivocal statement in favour of the freedom of intellectual expression would achieve that. Intellectual expression, I note, is separable from the old legal vices of defamation or threats to kill, etc. It is time for META to clearly state its commitment to intellectual freedom globally.

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10778

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

No information should be moderated, banned or censored unless it incites or advocates violence.

Full Comment

"All statements of fact or opinion are provisional. They reflect the current state of knowledge and experience. But knowledge and experience are not closed or immutable categories. They are inherently liable to change" - Jonathon Sumption. There was once a time that to say the earth was round was heresy, and saying the earth orbited the sun would have you tortured or executed. Both things were proved to be correct, but 'fact-checkers' would dismiss these ideas, Without dissenting voices and alternative views, the world would be a very different place. Each religious will say theirs is the only true God, they can't all be right, but which one is? Freedom of speech and expression is critical for not only a functioning democracy, but also to challenge orthodoxy. Without it, we do not evolve, alternative voices are needed to establish fact, and none should be shut down. Your platforms have a moral obligation to allow dissenting voices to be heard, no matter the subject, some may find it uncomfortable and some may be offended, that's no bad thing. Providing information does not show, incite or advocate violence, it should be allowed to be seen and said.

Link to Attachment

No Attachment



PAO 2022-01

Case number

PC-10779

Public comment number

Europe

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

English

Commenter's preferred language

Withheld

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

While COVID19 causes real harms, Meta must ensure interventions are situated within constantly evolving contexts. The effectiveness of such interventions can vary depending on the cultural contexts -- which is something that algorithms do not identify. In countries where there is a general lack of access to available information, and where Facebook is the primary source of news, removing misinformation without adequate consideration of the contexts can disrupt public discussion of COVID-19 and its impact. Meta must ensure transparency of its algorithms, ensuring access to researchers and civil society.

Full Comment

The prevalence and impact of COVID-19 misinformation in different countries or regions, especially in places where Facebook and Instagram are a primary means of sharing information, and in places where access to health care, including vaccines, is limited.' Two years since the start of the pandemic, COVID-19 misinformation remains commonplace. In countries where DCA works in, humanitarian crises, political instability or the failure of health institutions continue to enable the spread of misinformation. Actors or groups also take advantage of the crisis to create fear and distrust. Health workers can also be recipients and distributors of disinformation, which further enables its spread. For ethnic minorities and populations particularly within African countries, hesitation to vaccines and / or medical interventions can be rooted in a history of abuse and discrimination from medical institutions. Misinformation has increased distrust of health institutions, reduced vaccine uptake, and led to greater inequality in health outcomes. The impact can also be disproportional: vaccine hesitancy was found to be higher

among those residing in rural areas, those with lower educational levels and among women. Misinformation particularly those that resonate to such groups, such as messaging on ill-effects of vaccines on pregnancy or the use of vaccines to control marginalised populations, can further reinforce vaccine hesitancy. An indirect impact is how governments utilised the spread of COVID-19 misinformation, particularly those shared on social media, towards authoritarian aims. In DCA countries such as Cambodia, Kenya, Myanmar, and Bangladesh, such policies were used to target individuals criticising government responses to COVID-19, as well as ordinary individuals sharing misinformation because of the absence of reliable information. 'The effectiveness of social media interventions to address COVID-19 misinformation, including how it impacts the spread of misinformation, trust in public health measures and public health outcomes, as well as impacts on freedom of expression, in particular civic discourse and scientific debate.' Social media companies, as with other business entities have a responsibility to prevent harms on their platforms. Current efforts by Meta such as limiting the spread of harmful content, linking individuals to accurate information, and removing misinformation/disinformation that triggers hate and discrimination against certain groups, has been effective in quelling some harms. There remains a need however, to ensure interventions address the specific nature of misinformation. There may be a need to differentiate interventions – including for example, for public / official sources, for individuals and groups who intentionally spread harmful information, and for those who spread misinformation because of a lack of understanding, or access to better sources. These different forms may lead to different levels of harm and may necessitate specific interventions. Meta must also situate the spread of misinformation within constantly evolving contexts. The effectiveness of such interventions can vary depending on the cultural contexts -- which is something that algorithms do not identify. In countries where there is a general lack of access to available information, and where Facebook is the primary source of news, removing misinformation without adequate consideration of the contexts can disrupt public discussion of COVID-19 and its impact. While Meta and its partners / fact-checkers have made commendable efforts to link individuals to scientific sources on COVID-19, there needs to be assurances that such information is relevant and digestible to the groups targeted. While official sources such as the World Health Organisation provide necessary scientific and accurate information, their language may not necessarily be accessible to individuals and communities who may have developed a distrust of such institutions. Fact-checkers and **'negotiators' in the form of trusted and verified individuals within communities** (such as faith-based actors, civil society or scientific voices that can localise scientific messaging) can be effective in distilling scientific facts and address genuine fears and concerns. 'The use of algorithmic or recommender systems to detect and apply misinformation interventions, and ways of improving the accuracy and transparency of those systems. ' To help capture nuances in language and

cultural contexts, the populations that utilise Facebook and Instagram must be part of the development and improvement of these algorithms. Meta must ensure the diversity of material it uses to test out its algorithms. The development of algorithms must incorporate trends: there are for example, ways on how groups **spreading disinformation avoid being detected by Facebook's mechanisms** – such information which continues to evolve must be part of the development of such technology.<sup>3</sup> Human reviewers must be well-placed to understand the local contexts where misinformation thrives. These include not just understanding the local language and cultural contexts, but also the specific historical contexts on how medical interventions **have been used to target marginalised communities**. The EU's Digital Security Act mandates social media platforms to provide transparency on its use of algorithms. Meta can ensure it does this beyond the EU. 'The fair treatment of users whose expression is impacted by social media interventions to address health **misinformation, including the user's ability to contest the application of labels,** warning screens, or demotion of their content.' There must be sufficient explanation for any interventions used, and an option to get further information on why a post was demoted or removed. Civil society has often complained about the **opaqueness of Meta's content moderation and appeals system**

[Link to Attachment](#)

No Attachment

PAO 2022-01

Case number

PC-10781

Public comment number

Europe

Region

Maxine

Commenter's first name

Shaverin

Commenter's last name

English

Commenter's preferred language

Professional Gain Ltd

Organization

No

Response on behalf of organization

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Short summary provided by the commenter

Facebook, nor anybody else for that matter, has any right to suppress freedom of speech including opinion unless it is encouraging a violent, illegal act.

Full Comment

Facebook and others have been merrily removing content and posting warnings on posts they (or rather algorithms and employees) deem to be misinformation. But what is misinformation?

Most of the time, warnings have been placed on official data, material published by experts and organisational reports. What they have deemed to be misinformation has actually been narrative which disagrees with their opinion. As allegedly an independent organisation which does not publish material, merely provides a platform for others to do so, having published content from a wide range of opinions and data from numerous sources is positive for those who use the platform as one source of information amongst many so that they are able to weigh up the evidence and arguments to make a decision for themselves. We should not be told what to think or believe.

It is normal and right in science for there to be different opinions and for critique of the wide range of experiments, trials, reports, data etc which are produced. This is how science and research progresses. If we don't look for the shortcomings, the failings and take everything we are told at face value, we are often going to be disappointed when 'things' do not turn out the way we expect. Two good examples here being face masks and vaccines reducing the spread of covid 19. Awareness of the arguments for and against, and of the limitations of the alleged experiments and tests undertaken allow people to consider, whether or not, on the balance of probabilities, enrolling in a medical trial will 'save' them from the (un) deadly

disease that was and whether face masks would protect them and others or increase the likelihood of bacterial infection and oral cancers.

Facebook (and others) have gone further than this and even removed or warned against content which the organisations they have been supporting have provided themselves eg Pfizer trial data, UK ONS data. Indeed, it has not been so much removal of misinformation as taking a 'side' in an argument, which should never have been an argument and looking to discredit anyone not on their 'side'. Very childish!!

With Covid, facebook started from the perception that it was a deadly disease which was going to kill everyone in its wake - accepting computer modelling produced by a person with an abysmal track record of modelling, based on known to be inaccurate information as fact. We are facing exactly the same issues regarding climate change with Facebook starting from the perception that it is a given. It is not and nor was there evidence that covid was the new plague.

Making decisions as to what is 'harmful' based upon an opinion, a computer model, a belief or an opinion, dependent upon context, is harmful, expensive and ruinous to reputation. I could purchase a new wardrobe on the belief that I could diet down to be a size 8. The reality is that that would be an expensive exercise and waste of time and money. Indeed, much of what Facebook deemed to be harmful misinformation (regardless of the quality of the source) has been proven to be correct. Covid was never going to be a significant disease to the majority yet tens of thousands are already suffering vaccine harms when they were never at risk in the first place. Masks were never going to protect anyone yet people have suffered lung infections and cancers as a result. It probably did originate in a lab and denying that from being discussed results in no changes being made to how these labs operate or what they are allowed to do. The vaccines do not work as the WHO and Govts originally claimed and that was known as it was in Pfizer and Moderna's trial reports as to what they were testing against - published by them themselves right at the start and supressing that being shared meant again, people enrolled into a medical experimentation which has caused significant harm (and death) based upon misinformation which the authorities we are supposed to be able to trust were giving out.

Preventing debate, the questioning of authority and deemed expert opinion is ESSENTIAL in a democracy. How else do we hold those with power to account? Perhaps Facebook should be questioning its own values rather than beliefs and whether it values operating in a democracy or whether it wishes to silence everything they do not like or agree with in which case, an alternative platform will readily take its place.

Removal of or warning about 'misinformation' may appear on paper to be a laudable aim but the reality is that it is not realistic, practicable, feasible AND undemocratic

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10782

Public comment number

Latin America and Caribbean

Region

VITOR

Commenter's first name

FLOSI

Commenter's last name

Portuguese

Commenter's preferred language

Espaço Mental Clinica Médica

Organization

Yes

Response on behalf of organization

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Short summary provided by the commenter

Acredito que a liberdade de epressão é um dos mais importantes direitos do ser humano e não deve ser tolhida com nenhuma forma de censura coercitiva. Vivemos sob a chancela do politicamente correto, o responsável direto da criação de uma geração com o supergo mais hipertrofiado da história humana. Estamos adoecendo psiquicamente como nunca antes por esse motivo. Vivemos o século das doenças psiquiátricas.

Full Comment

Acredito que a liberdade de epressão é um dos mais importantes direitos do ser humano e não deve ser tolhida com nenhuma forma de censura coercitiva. Vivemos sob a chancela do politicamente correto, o responsável direto da criação de uma geração com o supergo mais hipertrofiado da história humana. Estamos adoecendo psiquicamente como nunca antes por esse motivo. Vivemos o século das doenças psiquiátricas.

Link to Attachment

No Attachment

PAO 2022-01

Case number

PC-10783

Public comment number

United States and Canada

Region

Michele

Commenter's first name

Slaughter

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

-----

Short summary provided by the commenter

Meta's over-thinking and lack of faith in the wisdom of our country's founders.

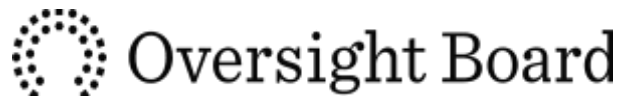
Full Comment

As demonstrated in the questions that concerns Meta, there seems to be a great amount of over-think occurring. The solutions Meta seeks cannot be found in anything other than allowing, and encouraging, the free and open expression of all ideas and topics. There are always multiple ways of viewing any topic, and medicine, in particular, is not set in stone, to be subjected to absolutes. Allowing for all opinions to be heard and evidence presented from all sides, ensures the truth will be revealed through discourse and debate. The only things Meta needs concern itself with are obvious, blatant threats of harm to others and name calling, then sit back and allow for free discussion to work it out as only it is able. Trust the wisdom of our constitution and the people, not government.

Link to Attachment

No Attachment





Public Comment Appendix for  
Policy Advisory Opinion 2022-01  
Case number

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End of public comments