APC submission to the thematic report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression: "Freedom of Opinion and Expression and Sustainable Development – Why Voice Matters"

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1. Introduction

The Association for Progressive Communications (APC) is an international network organisation dedicated to empowering and supporting people working for peace, human rights, development and protection of the environment, through the strategic use of information and communication technologies (ICTs). APC has 62 organisational members and 29 associates active in 74 countries, mostly in the global South. We work to build a world in which all people have easy, equal and affordable access to the creative potential of ICTs to improve their lives and create more democratic and egalitarian societies.

APC welcomes the invitation to contribute to the thematic report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression to the UN Human Rights Council: "Freedom of Opinion and Expression and Sustainable Development – Why Voice Matters".

The internet is a critical enabler of human rights, from freedom of expression and access to information, to freedom of assembly and protest, culture, education, health and work. Meaningful access to the internet[1] impacts social and environmental justice and development, and is a precondition for the exercise of many civil and political and economic, social and cultural rights in a digitalised society. Access to the internet is recognised as a prerequisite for achieving many of the Sustainable Development Goals (SDGs) and is explicitly addressed in Goal 9c, that is, to "strive to provide universal and affordable access to the Internet in least developed countries by 2020."[2]

Despite this goal, a lack of meaningful internet access affects around half of the world's population.[3] Recent research shows that in the context of emerging data-driven societies, this is already creating a new development divide, where unconnected people or those with only partial internet access cannot benefit from the incremental opportunities that digitalisation allows. The COVID-19 pandemic, for example, showed layered exclusions for the unconnected, or those without strong digital skills, including from rapidly digitalised government and private sector services, such as social services, health services and information, and education (creating what some described as a "learning divide" in education in their countries).[4] Those most affected were also likely to be at the intersection

[1] "Meaningful internet access" should be construed as pervasive, affordable connectivity (of sufficient quality and speed) to the internet in a manner that enables the user to benefit from internet use, including to participate in the public sphere, exercise human rights, access and create relevant content, engage with people and information for development and well-being, etc. This is irrespective of the means of such access (i.e. whether via a mobile or other device; whether through private ownership of a device or using a public access facility like a library).

[2] https://sdgs.un.org/goals/goal9

[3] APC. (2020). *APC Submission to the ITU Council Working Group on International Internet-related Public Policy Issues (CWG-Internet): Online Open Consultation on "International Internet-related Public Policy Issues on Harnessing New and Emerging Telecommunications/ICTs for Sustainable Development".* https://www.apc.org/sites/default/files/APC_Submission_ITU_CWG_Internet_22_January_2020.pdf

[4] Bytesforall Bangladesh. (2022). A "learning loss": Online education during the pandemic in Bangladesh. In A. Finlay (Ed.), *Global Information Society Watch 2021-2022: Digital futures for a post-pandemic world.* APC. https://www.giswatch.org/en/country-report/bangladesh

of multiple inequalities that include race, gender, class, age (older people are less likely to be able to digitally substitute), or location (such as the urban-rural divide). Stated differently, "the pandemic has highlighted that regional structural economic deficiencies and intersectional inequalities are amplified, as the economic and social value of the digital economy increases exponentially."[5]

It is within this context that our submission addresses in full or in part what we consider key issues that require attention by states with respect to areas 2, 3 and 4 of the call.

2. On addressing equality, inclusion, participation and empowerment of women and girls, Indigenous communities and other poor and marginalised groups

Meaningful access to the internet is required by all marginalised individuals, groups and communities to empower them socioeconomically and politically, and to enable the realisation of their interconnected rights. In an increasingly digitalised environment, their lack of internet access can imply a disconnection from these rights, as well as from the benefits of sustainable development and their ability to contribute to this development. In the case of marginalised individuals, groups and communities that are "somewhat" connected, they are often subject to various interlinking factors that result in their online marginalisation and exclusion, including low-grade connectivity, high data costs, the use of only basic digital devices, weak digital skills, language divides, and poor media and information literacy skills. In this sense they are also "unconnected", a status that tends to mirror already lived intersectional marginalisations and inequalities. Because digitalisation is increasingly expected to underpin the attainment of the SDGs, the ability of unconnected individuals, groups and communities to meaningfully realise their own agency, and to contribute to the realisation of the SDGs, is curtailed, amplifying already existing historical inequalities and marginalisations. Therefore, there is a critical importance in attaining meaningful internet access for the majority of people if the SDGs are to be realised in a just and equitable way.

With respect to the empowerment of women and girls, the latest data from the International Telecommunication Union (ITU) suggests that "there are about 250 million fewer women online than men, and the problem is more pronounced in developing countries."[6] Recent research shows that while the pandemic may have marginally increased the number of women who have access to the

[5] Research ICT Africa. (n.d.). *Concept Note: Beneficial Artificial Intelligence (AI) and Sustainable Development through Circularity*. https://researchictafrica.net/wp/wp-content/uploads/2022/02/Beneficial-Artificial-Intelligence-AI-and-Sustainable-Development-through-Circularity-1.pdf

[6] APC. (2020). Op. cit.

internet in some regions,[7] the gender gap remains a critical disabler of development, and therefore in achieving the SDGs in any inclusive way. Most affected are women who already suffer intersectional exclusions and marginalisation, including due to race, location, poverty, ethnicity, religion or sexual orientation. The human rights implications of the gender digital divide are that women are excluded from participating fully in public, economic and social life, and as such are unable to fully exercise their human rights, online and offline.

Moreover, the need for the systematic collection of data, aimed at identifying priorities and defining and monitoring key lines of action towards bridging the gender digital divide, is recognised in several global policy spaces such as the G20,[8] the OECD[9] and the Freedom Online Coalition (FOC).[10] There is, however, a persistent lack of gender-disaggregated data and insights on internet access and use by women. Without this data, gender differences – and the underlying reasons for the digital gender gap – are also obscured,[11] appropriate policy decisions that respond to the intersectional displacements of women are difficult to make, and measurements of the attainment of the SDGs are likely to be misleading. Representative and gender-disaggregated data should be gathered in a consistent and rigorous manner to reach a better understanding of the factors shaping women's access to and ability to benefit from meaningful internet access in diverse contexts.

With respect to freedom of expression and the right to access information online, two key issues are of concern:

Gendered disinformation: The weaponisation of disinformation against women in public spaces has long been pointed out as a form of gender-based violence online. A recent study by the Wilson Center Science and Technology Innovation Program argues, however, that gendered and sexualised disinformation is a phenomenon distinct from broad-based gendered abuse and should be defined as such to allow social media platforms to develop effective responses. They have defined it as "a subset of online gendered abuse that uses false or misleading gender and sex-based narratives against women, often with some degree of coordination, aimed at deterring women from participating in the public sphere. It combines three defining characteristics of online disinformation:

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[7] Research ICT Africa has found that as internet usage increases, the gender disparity in internet usage shrinks. See: Research ICT Africa. (2020). *COVID-19, Digital Substitutional and Intersectional Inequality: The Case of South Africa*. https://researchictafrica.net/wp/wp-content/uploads/2022/09/South-African-Country-Report-COVID-19-The-Case-of-South-Africa.pdf

[8] G20. (2018). G20 Digital Economy Ministerial Declaration. http://www.g20.utoronto.ca/2018/2018-08-24-digital.html

[9] OECD. (2018). *Bridging the Digital Gender Divide: Include, Upskill, Innovate.* https://www.oecd.org/digital/bridging-the-digital-gender-divide.pdf

[10] Freedom Online Coalition. (2020). *FOC Joint Statement on Digital Inclusion.* https://freedomonlinecoalition.com/wp-content/uploads/2021/06/FOC-Joint-Statement-on-Digital-Inclusion.pdf

[11] GSMA. (2018). *A toolkit for researching women's internet access and use.* https://www.gsma.com/mobilefordevelopment/wp-content/uploads/2018/05/GSMA-Women-and-Internet-Research-Toolkit_WEB.pdf

falsity, malign intent, and coordination."[12] Research by EU DisinfoLab, meanwhile, showed that "misogynistic narratives have been retrieved and adapted to fit within the mis- and disinformation landscape around COVID-19 – an event which has had a disproportionately negative impact on women's rights." This research concluded that the narratives tend to produce "either a negative representation of women as enemies, in order to fuel the public debate; or a pitiful depiction of women as victims in order to push an alternative agenda."[13] Examples of such narratives include women framed as responsible for the spread of the virus as a result of 8 March International Women's Day demonstrations[14] and women accused of taking advantage of the pandemic to push a secret gender equality agenda.[15] Those who speak out on feminist issues are also particularly targeted by disinformation campaigns,[16] as well as the issues they convey.[17]

Not only should gendered disinformation be considered a human rights violation that makes it difficult and in cases impossible and dangerous for women to contribute to inclusive socioeconomic and political development, and to be active agents in achieving social justice and transformation, but by limiting and complicating the agency of women to speak freely online, it makes it difficult for others to access the benefits of this agency for the well-being of communities and society as a whole. Gendered disinformation should therefore be seen as a critical obstacle to inclusive and sustained development, and a key impediment to realising the SDGs.

Online gender-based violence: It is now well documented that acts of gender-based violence that are committed online are a significant barrier to women's use of the internet and are violations of women's fundamental human rights, including freedom of expression and the right to access information. APC research has shown that online gender-based violence affects women's right to self-determination and bodily integrity, impacts on their capacity to move freely, without fear of surveillance, affects their ability to be fully online, and denies them the opportunity to craft their own identities online and to form and engage

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[12] Jankowicz, N., et al. (2021). *Malign Creativity: How Gender, Sex, and Lies are Weaponized Against Women Online.* Wilson Center. https://www.wilsoncenter.org/publication/malign-creativity-how-gender-sex-and-lies-are-weaponized-against-women-online

[13] Sessa, M. G. (2020, 4 December). Misogyny and Misinformation: An analysis of gendered disinformation tactics during the COVID-19 pandemic. *EU DisinfoLab*. https://www.disinfo.eu/publications/misogyny-and-misinformation%3A-an-analysis-of-gendered-disinformation-tactics-during-the-covid-19-pandemic

[14] Maldita. (2020, 7 April). El experto británico que entrevistó Espejo Público no vinculó el 8M con el incremento de casos de coronavirus: la respuesta está cortada. https://maldita.es/malditobulo/20200407/experto-britanico-8m-coronavirus-imperial-college-espejo-publico-antena-3

[15] neXt. (2020, 12 June). Il piano Colao e il gender. https://www.nextquotidiano.it/gender-nel-piano-colao-educazione-gender

[16] See, for example: African Organization for Families. (2017, 31 July). Stop IPAS from killing African babies. *CitizenGO.* https://www.citizengo.org/en-af/73124-stop-ipas-killing-kenyan-babies

[17] See, for example: Reid, G. (2018, 10 December). Breaking the Buzzword: Fighting the "Gender Ideology" Myth. *Human Rights Watch.* https://www.hrw.org/news/2018/12/10/breaking-buzzword-fighting-gender-ideology-myth and Gupta, P. (2018, 28 August). Fake News Targeting Women Part Of Social Media Virility: Experts. *SheThePeople*. https://www.shethepeople.tv/news/technology-law-peddling-fake-news

in socially and politically meaningful interactions in the digital realm. Women human rights defenders face particular threats online, including cyberstalking, violation of privacy, censorship, and hacking of email accounts, mobile phones and other electronic devices, with a view to discrediting them and/or inciting other violations and abuses against them.[18] This remains a pressing problem globally, and is a key debilitating factor in women participating in and fully contributing to the realisation of the SDGs.

In the case of Indigenous communities, which include land and environmental rights defenders working in and for these communities, we would like to raise the following two key issues:

Digital threats to defenders and local communities: A 2019 study by the Swedish Society for Nature Conservation found that 80% of environmental defenders surveyed faced the risk of physical and digital surveillance, smear campaigns (or disinformation) and death threats.[19] Surveillance is reported to involve the use of commercial spyware and surveillance tools, often developed in the global North by state and corporate actors working against environmental defenders and Indigenous communities.[20]

Targeted digital attacks by both state and non-state actors on environmental defenders are part of a continuum of violence that includes physical attacks and threats faced by defenders, their families and their communities. These attacks distort the public's access to credible information about Indigenous communities and their concerns, limit the right to freedom of expression for these communities, and threaten the ability of Indigenous nations and traditional communities to defend their ancestral lands and protect their environmental, social and cultural rights. By disempowering communities they inhibit their rights and abilities to participate meaningfully and openly and from a position of strength in inclusive and participatory development initiatives. Therefore, these digital attacks are inhibitors of any real achievement of the SDGs in a way that benefits those most affected by inequalities and marginalisations, are a grave infringement of the human rights of Indigenous communities, and result in a further marginalisation of communities that are already disempowered.

Impact on global coordination of environmental issues: The impact of digital attacks on environmental defenders and Indigenous communities extends from the grassroots level to the coordination of groups and communities at a global scale. The attacks often increase when global coordination is needed around key issues such as climate change, infectious diseases and deforestation. This inhibits the ability of this coordination to properly happen in a meaningful and participatory way, and for information between stakeholders to be freely

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[18] APC. (2017). *Bridging the gender digital divide from a human rights perspective: APC submission to the Office of the High Commissioner for Human Rights.* https://www.ohchr.org/Documents/Issues/Women/WRGS/GenderDigital/APC.pdf

[19] Citizen Lab. (2020). On/offline: Multidimensional threats faced by environmental human rights defenders in Southeast Asia. In A. Finlay (Ed.), *Global Information Society Watch 2020: Technology, the environment and a sustainable world.* https://www.giswatch.org/node/6228

[20] Finnegan, S., & Leevers, J. (2021, 11 November). APC at Tech for Democracy: How can digital technology support environmental justice and its defenders? *APC*. https://www.apc.org/en/node/37761

shared and collectively used.[21] In this respect, localised digital attacks on environmental defenders are not only a critical issue for the inclusion of local communities in appropriate sustainable development initiatives, but an issue that has an upward impact on the ability to coordinate an effective global response to pressing concerns such as climate change.

3. On the role of independent media and investigative journalism in promoting sustainable development and the barriers, threats and challenges they face

Independent local and community media is critical for local-level accountability, transparency, and implicitly for tracking and assessing the progress of countries in achieving the SDGs. A flourishing local media environment provides a level of citizen oversight of state programmes and projects, and, if committed to the public interest and human rights, is essential in measuring and protecting the intentions of inclusive development and social justice which underpin the SDGs.

Specifically, we would like to raise three points in this context with reference to the internet as an enabler of rights essential to achieving the SDGs, and in the context of the emerging data societies:

The state's commitment to free expression and access to information underpins the successful realisation of the SDGs: The extent to which community media can serve its function of accountability and transparency in the public interest, and therefore properly serve its function as offering a vehicle for citizen oversight of the SDGs, depends on the state's commitment to freedom of expression and access to information. For example, at the height of the COVID-19 pandemic, online freedom of expression was mainly threatened through four mechanisms: the use of legislation and regulations; deliberately limiting the internet (e.g. through throttling and internet shutdowns); media control; and active online monitoring of social media and harassment of users by the government or government supporters.[22] These mechanisms, when they are used to supress a free media or stifle citizen oversight and criticism of state actions, should be considered barriers to development and the proper realisation of the SDGs.

A commitment to freedom of expression and community networks: Internet access for marginalised communities can be critical to the functioning of an independent local media, both for the wider publication of their reporting and investigations and for their access to information so that they can do their work. In unconnected communities, community networks that are set up, owned and run by communities themselves offer a unique opportunity for enabling rights and development, as well as for securing a community-responsive local media

[21] Citizen Lab. (2020). Op. cit.

[22] See various reports in Finlay, A. (Ed.). (2022). *Global Information Society Watch 2021-2022: Digital futures for a post-pandemic world*. https://www.giswatch.org/2021-2022-digital-futures-post-pandemic-world

that ensures transparency and accountability at the local level. Several countries across the world have embraced the idea of community networks for furthering access at the local level, and have started to develop the necessary regulatory frameworks for these.[23] However, to contribute to the realisation of human rights and the SDGs, there is a critical need for these regulations to be accompanied by guarantees of freedom of expression and access to information at the local level, so that community networks can function as hubs of transparency and accountability, free from censorship or state or regulatory censure.

The role of local data and data sovereignty: Both the achievement of the SDGs and the emerging data society are dependent on access to meaningful and nuanced data. The lack of quality, reliable and available data in many countries in the global South – particularly, but not only, local-level data – entails an invisibility of marginalised communities and their concerns, a further disempowerment of these communities, and national-level policies that are developed without the proper information at hand. APC believes in the data sovereignty of local communities,[24] and their ability to be the agents of their own data collection, interpretation and control. A free and independent community media has a critical role to play in helping to secure this data sovereignty at the local level, and, in collaboration with communities, in building local data narratives that properly represent and empower marginalised and threatened individuals and groups.

4. On policies and practices of digital technology companies in promoting sustainable development and reducing inequalities in access to information and communications

The ICT industry has continued to evolve, with new technologies such as machine learning, artificial intelligence (AI), robotics, virtual reality and the "internet of things" predicted to revolutionise our future, and contribute towards achieving the SDGs.[25] Those who promote the arrival of a "Fourth Industrial Revolution" frequently reference these technologies as "having the potential to propel digitally-ready countries into a new age of unprecedented economic prosperity."[26] However, there is a clear need for more research and critical

[23] Diga, K., et al. (2022). Advocacy for community-led connectivity access in the Global South. In A. Finlay (Ed.), *Global Information Society Watch 2021-2022: Digital futures for a post-pandemic world.* APC. https://www.giswatch.org/en/digital-rights-internet-advocacy-meaningful-access/advocacy-community-led-connectivity-access
[24] Global Indigenous Data Alliance. (n.d.). *History of Indigenous Data Sovereignty.* https://www.gida-global.org/history-of-indigenous-data-sovereignty
[25] IISD. (2023, 1 February). Event highlights potential of artificial intelligence in enabling SDGs. https://sdg.iisd.org/news/event-highlights-potential-of-artificial-intelligence-in-enabling-sdgs
[26] Gillwald, A. (2019, 20 August). South Africa is caught in the global hype of the fourth industrial revolution. *The Conversation*. https://theconversation.com/south-africa-is-caught-in-the-global-hype-of-the-fourth-industrialrevolution-121189

assessment of the impacts of digitalisation in achieving the SDGs, as recent research from the ITU also suggests that "while AI can enable 134 of the 169 SDG targets across all the Goals, it may inhibit 59."[27] At the same time, the demand for critical minerals required for digital technologies is expected to increase exponentially in the coming years, and communities impacted by mining and extraction of these critical minerals are facing threats by state and non-state actors that violate their rights and the rights of nature.[28]

Internet infrastructure roll-out: From an internet infrastructure perspective, 5G (the newest generation of mobile connectivity) "is being positioned as the underlying connectivity infrastructure upon which many [new] technologies will rest and through which people and things will interact."[29] Between 2019 and 2025, it is expected that mobile operators across the world will spend USD 1.3 trillion on network infrastructure, of which more than 75% will be related to 5G, a technology designed for high density of users and devices in urban environments, where most people are already connected.[30] In contrast, it is estimated that only about USD 450 billion would be required to connect the next 1.5 billion people.[31] This shows where the interest of the industry is, given that rural roll-outs have in fact recently slowed down, or even ceased, as operators focus their investments on more profitable 4G/LTE and now 5G installations in competitive urban markets. This means that if governments and industry do not deliberately change their strategies to encourage complementary approaches, there will continue to be people with low or non-existent levels of access in rural areas in most developing countries (and even in many developed ones), despite 35 years of GSM mobile network development.[32]

Similarly, investments in machine-to-machine connectivity appear to be gaining more attention than connecting the unconnected. Peter Bloom of Rhizomatica, an APC member organisation working on alternative telecommunications infrastructure, has argued that there has been a change in discourse, from connecting people to connecting things. He points out that the patronising/colonial nature of the "connecting people" discourse is problematic in its own right, but when that is being supplanted by "connecting everything", further concern is warranted. Alison Gillwald, executive director at Research ICT Africa, makes a similar point regarding Africa: "At the same time, international donor agencies and governments are diverting public funding from pro-poor policy research agendas on digital inclusion to artificial intelligence as well as

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[27] IISD. (2023, 1 February). Op. cit.
[28] For example, see: Ciacci, J. (2020, 15 December). "We are struggling to survive": Resistance against mining in Acacoyagua, Chiapas. *APC*. https://www.apc.org/en/blog/we-are-struggling-survive-resistance-against-mining-acacoyagua-chiapas
[29] Bloom, P. (2019, 4 April). Talkin' 'bout my (5th) Generation. *Rhizomatica*. https://www.rhizomatica.org/talkin-bout-my-5th-generation
[30] Shabelnikova, A. (2019). *2025 Capex outlook: Financing the 5G era*. GSMA. https://data.gsmaintelligence.com/research/research/research-2019/2025-capex-outlook-financing-the-5g-era
[31] Broadband Commission for Digital Development. (2016). *Working Together to Connect the Next 1.5 Billion by 2020*. https://www.itu.int/dms_pub/itu-s/opb/pol/S-POL-BROADBAND.16-2016-PDF-E.pdf
[32] https://www.gsma.com/aboutus/history

robotics, machine learning, drones and blockchain. This, on a continent where Internet penetration in many countries is below the critical mass 20% believed to be necessary to enjoy the network effects associated with broadband adoption and economic growth."[33]

While it is necessary for the private sector to revisit their access strategies within the context of the SDGs, states can do their part in the face of what is effectively private sector inaction in connecting the unconnected. For example, the objectives and commitments for universal affordable access, as required by SDG Target 9c, need to be reinforced before the benefits of new and emerging technologies can be fully realised. At the same time, innovative complementary solutions to existing national mobile broadband strategies need to be considered.

Although traditional strategies are now coming under more scrutiny, most governments are not yet aware of the potential impact of independent, small-scale community-based networks. As a result, these networks are still relatively scarce, or invisible, because regulatory environments are generally hostile to them and are not yet adapted to foster their growth and replication. Aside from the absence of enabling regulatory environments, community networks, particularly those in rural areas in the global South, also face other difficulties. Financial resources for their initial deployment are often very limited and there are other factors such as lack of affordable or reliable energy supply, and high costs for backhaul connectivity. Yet, despite these difficulties and their lack of visibility, community networks also appear to have many advantages over traditional large-scale commercial networks, including: enabling freedom of expression and access to information at the local level through more local control over how the network is used and the content that is provided over the network; greater potential for attention to the needs of marginalised people and the specific populations of rural communities, including women and older people, including through data sovereignty and building local data narratives; lower costs and retention of more funds within the community; the potential to promote the environmentally friendly and sustainable use of ICTs; and an increased potential to foster a sense of agency and empowerment among users and those involved in the network. It is therefore recommended that states pay urgent attention to the limitations of current access models, and explore the benefits of local access models within the frame of human rights and the SDGs.

Dealing with disinformation: Lastly, with the continuous spread of disinformation, internet platforms have been facing increasing pressure from governments and other actors to take down content that is harmful. Measures by platforms have included the promotion of authoritative sources, alongside an increase in automation of content moderation.[34] Although these are signs of a more responsive industry, more meaningful and impactful changes targeting the business model of these companies, in particular their exploitation of personal data and the obscure use of algorithms, remain to be seen. Research from APC

[33] Gillwald, A. (2019, 20 August). Op. cit.
[34] Meyer, T., & Hanot, C. (2020, 28 September). How platforms are responding to the 'disinfodemic'. *EU DisinfoLab.* https://www.disinfo.eu/publications/how-platforms-are-responding-to-the-disinfodemic

member Intervozes also shows that digital platforms lack policies and structured processes on the issue of disinformation and that they have been developing specific and reactive actions to combat the phenomenon.[35] An increased reliance on AI-driven content moderation with the risk of false positives,[36] limitations in capturing nuances and contextual specificities, and without transparency, accountability and due process, pose serious risks for freedom of expression and access to information online. As APC has stated, processes developed by intermediaries should be transparent and include provisions for appeals.[37] Content removal should be subject to human review, and users should have easy recourse to challenging removals which they believe to be arbitrary or unfair.[38]

[35] Intervozes. (n.d). *10 ways to combat disinformation.* https://intervozes.org.br/publicacoes/10-ways-to-combat-disinformation
[36] Vincent, J. (2020, 21 September). YouTube brings back more human moderators after AI systems over-censor. *The Verge.* https://www.theverge.com/2020/9/21/21448916/youtube-automated-moderation-ai-machine-learning-increased-errors-takedowns
[37] APC. (2020). *APC input to the public consultation on the Santa Clara Principles on Transparency and Accountability in Content Moderation.* https://www.apc.org/en/pubs/apc-input-public-consultation-santa-clara-principles-transparency-and-accountability-content
[38] APC. (2018). *Content regulation in the digital age: Submission to the United Nations Special Rapporteur on the right to freedom of opinion and expression.* https://www.ohchr.org/Documents/Issues/Opinion/ContentRegulation/APC.pdf