

12.9.2022

To  
**Mr. David Miles**  
**Director of Safety and Policy, EMEA**  
**Meta**

Re: **Call for Action: Meta's failures to enforce its Safety and Authenticity rules in Israel**

There is no denying that in recent decades, digital content platforms, primarily social networks, have become a central arena in which the social and economic fabric of the entire world, and in Israel in particular, is shaped. Aside from the contribution of social networks to building communities and enriching public discourse, there is also no denying the responsibility of the platforms in maintaining the safety of users and protecting the public from misuse of their services.

The community rules, which are established by the social networks, are one of their main ways to protect their users, among other things through the determination and enforcement of rules prohibiting different types of content and accounts. For example, Facebook prohibits content that encourages suicide or self-harm, the creation of fake or unidentified accounts, and limits the distribution of fake news content that may harm the health of users.

**We are contacting you, as the Director of Safety and Policy for EMEA at Meta Group, in view of alarming findings and publications that attest to substantial failures in the self-enforcement of the community rules of the Meta Group - in non-Western countries and languages, and in our case - in Israel and regarding content in the Hebrew, Arabic and Russian languages.**

Just recently the Oversight Board - Meta's independent review body - established that the investment in managing and monitoring content in languages other than English is insufficient, pointing to the small number of inquiries it received from users in India and other non-English speaking countries.<sup>1</sup> Adding to these concerns are data published at the end of 2021, according to which 87% of Facebook's global budget for dealing with fake news is invested in content that is published in the US.<sup>2</sup> Documents presented by a former Facebook employee, Frances Haugen, to the US government, reveal that Facebook's artificial intelligence systems are unable to detect offensive content in a large number of languages used by platform users around the world. Thus, for example, in 2020 Facebook did not have filtering algorithms used to find incorrect information in the languages of Myanmar or Ethiopia.<sup>3</sup>

The academic research also identified the increased dangers to the safety of users in countries where the primary language is not English in countries and languages that are not English. Evelyn Douek, a senior

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<sup>1</sup> Oversight Board First Annual Report, page 19, June 2022 ([link](#)).

<sup>2</sup> Nick Popley, "The 5 Most Important Revelations From the 'Facebook Papers'", 26.10.2021 ([link](#)).

<sup>3</sup> Id.

researcher at the Knight First Amendment Institute, explains that the increased danger to the safety of users in countries where the primary language is not English is the time required to let the artificial intelligence learn the language and the time needed to translate the community rules and adjust the content enforcement mechanisms, before Facebook enters the market in a foreign country.<sup>4</sup>

In addition, findings by the Global Witness organization from last month show that Meta still fails significantly in dealing with content defined as violating the purity of elections in languages other than English.<sup>5</sup> An experimental study conducted by the organization showed that Meta approved 10 out of 10 advertisements published in Portuguese against the background of the upcoming elections there, even though they contained clearly misleading content concerning the elections that could have had a significant impact on them. In addition, as part of the experiment, the ads were published from outside of Brazil, and were not even marked as sponsored ads or content as required by Meta.

**The limitations of the social network in the effective identification and removal of content and accounts that violate its community rules are also present in full force in the Israeli arena and in the Hebrew, Arabic and Russian languages and require an immediate response by the Meta Group.**

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An extensive investigation carried out by the FakeReporter organization in Israel in recent months illustrates and demonstrates well how the systemic failures identified regarding the enforcement of community rules in relation to non-Western languages and countries are more strongly expressed in the Hebrew language as well.<sup>6</sup> The disturbing findings that emerge from FakeReporter's investigation point to many failures in the enforcement and reporting mechanisms that require urgent correction:

**One group of examples includes enforcement failures of the community rules regarding the reliability and authenticity of usernames on the social network (Account Integrity and Authentic Use) in the Hebrew language.** In this rule, Facebook's policy rules on account authenticity prohibit the use of symbols, numbers, a sequence of identical characters, the combination of several languages and even the prohibition of combining names or expressions of places.<sup>7</sup> Despite the existence of these explicit criteria, an investigation by the FakeReporter organization last year documented hundreds of accounts in

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<sup>4</sup> Rishy Iyengar, "Facebook has language blind spots around the world that allow hate speech to flourish", CNN, 26.10.2021 [\(link\)](#).

<sup>5</sup> <https://www.globalwitness.org/en/campaigns/digital-threats/facebook-fails-tackle-election-disinformation-ads-ahead-tense-brazilian-election/>

<sup>6</sup> The study examined the subject in the Hebrew language only. We proceed from the assumption that there is no fundamental change in other languages used in Israel, in particular Arabic and Russian.

<sup>7</sup> <https://www.facebook.com/help/112146705538576>



the Hebrew language that clearly violate the rules on integrity and authenticity, which are not removed by the social network even after active reporting by users.<sup>8</sup>

Of course, it is not reasonable to expect that Facebook's enforcement mechanisms regarding these rules will immediately identify and deal with any account that violates the community rules. However, it is clear that these violations can be automatically enforced relatively simply, for example, by frequent automatic scans of usernames while detecting a combination of languages, a sequence of characters or common violations such as using the name "anonymous" in the various languages. To illustrate the scope of the violation of the rules in this regard in the Hebrew language, one may look at the Facebook search results for users whose name is a "pseudonym" ([link](#)), as a clear and widespread violation of the community rules, which can be easily and automatically identified.

Another example is the enforcement failures regarding content in Hebrew that clearly violates the clear community rules against drug-related content or using a platform to promote illegal activity. Meta's Community Rules expressly prohibit content that deals with the trade or promotion of dangerous drugs and activity or content intended to coordinate or promote crime (such as the distribution of counterfeit currency or prostitution services). It is emphasized that this specific content ban is relatively simple to identify in comparison to identification of more abstract or subjective content bans such as "hate speech" or "incitement."

Despite the explicit ban on content of the aforesaid type, the FakeReporter organization's investigation documented many cases of accounts and posts in the Hebrew language that clearly and explicitly deal with the trade of dangerous drugs, detailing in Hebrew and explicitly the multitude of substances they offer for sale.<sup>9</sup> As documented by the organization, not only are these posts not automatically located by the social network through a simple search of the names of the drugs in Hebrew, proactive reports about the content are also rejected by the social network (automatically, apparently) by stating that the content does not violate the community rules, even though for those who understand Hebrew, the subject of the reported contents is undeniable.

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**These enforcement failures raise an immediate concern of the safety of the users, specifically in view of the preparations and campaigns in advance of the upcoming round of elections in Israel that will be held this November. We are contacting you at this time in order to provide warning in advance of these failures and demand that an adequate response be received as soon as possible.**

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<sup>8</sup> [This link](#) shows a number of representative examples of accounts in the Hebrew language that unequivocally violate the Facebook rules against inauthentic names.

<sup>9</sup> [This link shows](#) a large number of examples of content in Hebrew that violates the community rules on the matter of drugs and illegal activity that has been active for long periods on Facebook and Instagram.



This is the case against the background of Meta's statements that it operates an action center designed to provide an adequate response to maintaining the integrity of the election process that will be held in a number of selected countries (among them, the USA, India, Brazil, European countries and others).<sup>10</sup> Just recently, in August 2022, Meta announced that it will take several steps to help maintain the purity of the upcoming elections in Brazil, including: investing in technology and teams that will protect the elections; creating cooperation with the authorities and independent fact-checkers for the purpose of providing reliable information on the subject of the elections and to combat misinformation; and the establishment of an action center for handling the elections which will identify dangers in real time and shorten processing times.<sup>11</sup> The company emphasizes that beyond the concern that its platforms will not lead to damage to the elections, it also undertakes to provide transparency regarding the elections and encourage people to vote.<sup>12</sup>

We of course appreciate these steps taken by Meta; however, in view of the Company's assessments in advance of similar events in certain countries and certain languages, we ask that actions be taken to protect all of the users in an equal and identical manner, regardless of their country of origin or language.

As the Meta Group itself reiterates, the community rules regarding prohibited content or users are primarily intended to ensure the safety and well-being of users against abuse of the platform by other users. The specific examples given above in relation to the Hebrew language, as mentioned, join the body of accumulated evidence of the unique failures of the social network in enforcing its own community rules against infringing content and users. If we do not ensure that the community rules and the terms of use of the platforms have meaning in practice also in the Hebrew, Arabic and Russian languages in Israel - these will be wasted.

Against this background, we urge you to open an immediate dialogue with the relevant State authorities and civil society bodies, in order to formulate an effective and immediate response that will ensure that users in Israel will have a safe online space. **This need becomes even more urgent and critical with the opening of the campaigns for the Knesset elections and the need to ensure effective enforcement of the relevant community rules to prevent fake accounts or inflammatory content.**

The beginning of the dialogue and partnership in order to ensure effective enforcement of the rules of conduct and safety on the platform for content and users in the Hebrew language, should be done through the sharing of essential information in understanding and learning the specific enforcement failures in relation to content and users in Hebrew or in Israel. For example, just as Meta publishes state data on the scope and effectiveness of its content enforcement actions in countries such as India or Germany, we call on Meta to publish data regarding the content management (removal, reduction of exposure, suspension of accounts, termination of monitoring, etc.) that it carried out in the past year in relation to users of the

<sup>10</sup><https://www.facebook.com/gpa/resources/election-integrity>

<sup>11</sup> <https://about.fb.com/news/2022/08/how-meta-is-preparing-for-brazils-2022-elections/>

<sup>12</sup> <https://about.facebook.com/actions/preparing-for-elections-on-facebook/>

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platform originating in Israel or in the Hebrew, Arabic and Russian language in Israel; together with the scope and results of the objection procedures on them. Within this framework, we call on the Meta Group to share with us information about how reports are checked in relation to content or an account in the Hebrew and Arabic languages, and characteristics of the technological or human factors that handle user reports and decide whether to take enforcement action.

We hope that Meta, and Facebook Israel as its representative in Israel, will show the required responsibility towards the Israeli public and formulate immediate steps to deal with the content enforcement failures in relation to content and accounts in Hebrew, Arabic and Russian, especially against the background of the upcoming elections and the need to enforce the content rules of the networks in this arena.

We will be happy to arrange a meeting as soon as possible to discuss matters.

Sincerely,

Dr. Sharon Bar Ziv

President of the Israel Internet Association

Adv. Yoram Hacohen

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