

## **Investor Alliance for Human Rights: Amnesty Report on Meta & Ethiopia Access Now feedback**

1. In their human rights reporting, Meta must be more specific on which **actions and improvements** are done because of existing or new **legal requirements** - and not present these are their own, voluntary actions.
2. To make any of their consequent commitments to further improvements actually matter, the company must **commit to deadlines and concrete metrics on how and when they intend to implement the proposed improvements**. For example: Meta should invest in adequate staffing and resourcing of the Trusted Partners Program.
  - a. The company should also consider **revising their existing KPIs** to add focus on measuring the actual effectiveness and impact of their human rights work, rather than reporting on statistical numbers only - for example, reporting on the number of Trusted Partners is hardly sufficient, if the program is not working. Meta should instead report on e.g. their own response times to incidents raised by Trusted Partners, or on the overall time in which the incidents are resolved.
3. Meta should openly acknowledge and address challenges in the business and human rights work for its reporting to be more robust and impactful. The company's credibility is diminished when it reports issues as solved that external stakeholders, including the media, **provide evidence to the contrary**.
4. Openly acknowledging and addressing challenges in the business and human rights work makes for a more powerful and impactful reporting - continuously presenting everything as "problems solved" while the external stakeholders, incl the media, indicate otherwise, **only diminishes the company's credibility - not to mention increasing risks for continued human rights violations**. (Perhaps they should also try to be a little more humble about the challenges they are continually faced with.)
5. Meta must accept accountability in the role the company repeatedly faces in regions and countries undergoing political unrest or military conflict - Meta **continues to repeat the same mistakes and violations every time regardless of country and region**, which indicates no concrete measures are being taken to learn from past mistakes. This is something that should be escalated to the Meta Board, as the human rights team clearly does not have the mandate to put any corrective measures in place internally. Escalation to the Board will also

demonstrate that there's high level buy-in on Meta's stated human rights commitments.

6. Meta should report on the feedback they're receiving from civil society and why recommendations may or may not be accepted.
7. Finally, investors should also study the recently published [Instagram](#) and [Facebook](#) reports under the EU Digital Services Act;
  - a. The reports provide many insights into the company's content moderation processes, including such things as number of content moderators in local languages vs the overall numbers of platform users in a specific country.
  - b. Interestingly enough, e.g. [LinkedIn](#) provides detailed reporting on the estimated error rates of automated content moderation decisions on their platform per different languages, but Meta provides no similar data, only a general verbal description under the title "Indicators of accuracy, error rates, safeguards" but with no actual data on these indicators. Given this was only the first reporting round, it cannot be expected that everyone's disclosures will be perfect, but now is definitely the time for stakeholders to be prepared to study, compare and to scrutinize the different companies' disclosures for further improvement.
  - c. Given Meta now has a reporting and data collection infrastructure in place to provide the public with such detailed information, stakeholders should demand for similar transparency measures from other focus countries, such as the ones where Meta draws negative media attention on its LACK of adequate content moderation, like Ethiopia.

Access Now remains available for further engagement on the recommendations listed here, including the EU DSA reporting.

For more information, please contact:

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human rights agenda to the use, development, and governance of digital technologies, and to intervene where technologies adversely impact our human rights. By combining direct technical support, strategic advocacy, grassroots grantmaking, and convenings such as RightsCon, we fight for human rights in the digital age.