



# Declaration of online platform operators subject to Section III of the Law of 22 December 2018 on combating the manipulation of information

## Presentation of the 2020 questionnaire

### 1. Reminder of the context for the report

Section III of the Law of 22 December 2018 on combating the manipulation of information imposes a duty of cooperation on online platform operators in the fight against the dissemination of false information. In particular, these operators are required to implement appropriate resources and means to combat the dissemination of false information on their services. They must submit **an annual declaration to the Conseil Supérieur de l'Audiovisuel (CSA)**, outlining these resources and means.

As provided for by the law, the CSA sent **a recommendation to the operators on 15 May 2019** regarding the measures that operators may implement and setting the 31 March deadline for submitting their annual declarations to the CSA.

**The CSA is responsible for publishing a periodic review of the enforcement of these measures by the operators and their effectiveness.** In its first report, covering 2019 and published on **30 July 2020**, it highlighted both the high degree of cooperation by operators on these issues, but also the lack of information on the human and financial resources dedicated to moderation, on the quantification of the phenomenon of dissemination of false information and of algorithmic transparency. It made several recommendations for operators to improve their structural measures.

### 2. Changes in the questionnaire for the 2020 financial year

Following the method used in 2019, **the CSA publishes a questionnaire, the content of which has undergone some changes**, with regard to the lessons learned from the first report, regular exchanges with the sector, as well as news and reflections offered by the committee of experts on disinformation through the CSA on transparency of algorithms and financial flows related to false information:

- it provides for **monitoring the consideration of the recommendations made in the 2019 report** with particular attention on **the impact of the COVID-19 pandemic**, both with respect to the structural measures and the operation of the services;
- it encourages operators to **provide examples** and **share case studies** in order to illustrate the elements declared;



- it recalls that operators must **provide the CSA with all the information necessary to draw up the report** and that in this respect they may send it information covered by business secrecy;
- it **specifies the acceptance granted to several concepts used**, relating to commercial communications and algorithmic transparency.

**The first part of the questionnaire relates to the reporting system.** The CSA invites operators to provide **more details on human and financial resources** and the **procedure for investigating and handling reports**. It also stresses the need for **quantified data**.

**The second part, relating to transparency of algorithms**, has been reviewed so that the operators' responses are more detailed. The concepts of **loyalty, explicability and fairness** have been clarified, as they are crucial to interpretation and proper understanding to assess the transparency of the recommendation and moderation systems.

**The third part concerns the promotion of content from press companies, news agencies and audiovisual communication services.** The focus is on **identifying sources, human and financial resources, and fact-checking procedures**.

**The fourth part concerns the fight against accounts disseminating false information on a massive scale.** The reality of these practices varies according to the model of the platform; therefore, the CSA invites operators to describe them and to provide **examples and figures**. Specific questions have been added **concerning deepfakes and practices generating artificial traffic or artificial spread of content on a massive scale**.

**The fifth part concerns measures to combat false information spread by commercial communications and the promotion of information** content that relates to debates of general interest. It was complemented by a focus shedding light on the **links between financial flows and false information**, a crucial point in the fight against false information. The second component is the **content promoted by information that relates to debates of general interest**.

To conclude, **the sixth part concerning media and information education** has been enriched with a table allowing one to **reference media and information education campaigns**. Operators are also invited to provide operational information on their **relations with the research community**.