



🌐 freeexpression.org.za

✉ info@freeexpression.org.za

📄 Reg no 2021/582081/08

📍 139 Greenway
2nd Floor
Greenside
Johannesburg

Nick Pickles
Lead X Global Government affairs team
npickles@x.com

26 February 2024

Dear Nick

As the regional/national representatives of your company and responsible for South Africa, we assume that you are knowledgeable about your institution's preparations underway concerning the use of your platform services during the upcoming national and provincial elections. We believe the South African public would be well positioned to support and contribute to the integrity of the poll, if they are aware about the role you will play. To this end, we have set out below a list of salient points about which we would wish to be put in the know.

The Campaign for Free Expression (CFE) is an NGO committed to advancing public awareness of free speech and access to information in South Africa. Although a young organisation, we have built up a strong and credible track record for the protection and promotion of free speech through monitoring and reaction, research and publishing, lobbying and strategic legal action, as is evident on our [website](#).

Your cooperative response to this letter will help contribute to CFE's own

Directors:

Carol Steinberg, Adriaan Basson, Prof Sizwe Mabizela, Dr Ismail Mohamed, Anton Harber (Executive Director)

nation-wide activity to protect information integrity during the election, and enable us to share with the electorate the role that key stakeholders like yourselves will be playing.

We note the advice to companies such as your own by the [Integrity Institute](#) that “If your presence in a country is large enough that your platform could impact an election, then it is large enough to justify paying people to work on these issues”. On this note, we thus request that your company respond comprehensively to this letter within 10 working days, cognisant that the election is on 29 May and that the clock is ticking.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Anton Harber'.

Anton Harber
Executive Director

Questions for X

1. If your company classifies elections in terms of a tier system and/or Countries at Risk system, please advise us how these tiers or categories work, the criteria for country placement and in which category is South Africa placed.
2. If there is such a system, what are the risks and/or terms as applicable to South Africa, and how this assessment is translated into your plans, policies and practices as relevant to the integrity of the upcoming elections?
3. In regard to your company's general global policies about elections, information about how these generic terms will be applied - and assessed - in the specifics of the South African case.
4. If due diligence assessment has been done by your company concerning specific risks in the South African elections, which groups were consulted for this (if any), and whether such an assessment (or parts thereof) will be made public and if so, when.
5. If not covered above, what additional preparations, in terms of implementing company policies over the South Africa election period, are being taken to detect and use levers in relation to countering the circulation of: (a) electoral disinformation, (b) hate speech and harassment on your services as relevant to the election, and (c) incitement to violence relevant to the election.
6. If not covered above, how your company will react in regard to such detected content, and how proposed sanctions will correspond to different types of violations of policy on your platform? Examples (non-exhaustive) are: when you may implement fact-checking, labelling, algorithmically deprioritising particular content visibility, adding friction such as limiting sharing by users, feature restrictions (e.g. blocking ability to livestream; to monetize; or to advertise where appropriate to your company's practices and surfaces), issuing warnings, and deplatforming those actors you deem egregious violators.
7. If not covered above, information about how your company plans to contribute to voter education and information, and to promote authoritative information in feeds and search - such as content from the IEC as well as content from those news media outlets which subscribe to the code of conduct and process of the South African Press Council or the Broadcasting Complaints Commission of South Africa?
8. Information about how you will protect journalists subjected to attacks on the company services, and what actions you will take against perpetrators.
9. If not covered above, what South African languages will be served by your company's content moderation systems (human and AI) during the election.

10. Information about any target metrics concerning turn-around times in order to timeously address concerns or complaints emanating from key stakeholders like the IEC, political parties, civil society and the media; and details about fast-track mechanisms to urgently deal with harmful content reported by key electoral stakeholders.
11. If not covered above, information about how your company's systems to identify AI-generated images, video and audio pertinent to the elections, and the content moderation actions, will be triggered in relation to content such as when it potentially causes harms such as those listed in 1.5 above.
12. What data access (including real-time access), if any, your company is prepared to offer South African researchers (including academics, civil society groups, and journalists) for monitoring election-related content, behaviours and actors, and related company interventions, on your platform.
13. Any mechanisms you are putting in place to identify and then to share information with peer companies about co-ordinated inauthentic information operations during the South African elections (which operations may likely be cross-platform).
14. How your company intends to monitor the impact of measures on its services, in terms of their direct or indirect contribution to election integrity.
15. What type and frequency of transparency reporting you are envisaging to do before, during and after the election.
16. Information about whether the company has mechanisms to prevent fake actors from purchasing verified "blue ticks" as relevant to election integrity issues.
17. If and how you will monitor recommender algorithms for possible amplification of electoral content that may violate your relevant terms of service.