27 September 2025

To,

Division for Public Institutions and Digital Government
Department of Economic and Social Affairs (UNDESA)
United Nations

Sub: Submission of Feedback/Comments on WSIS+20 Zero Draft

Dear Sir/Madam,

On behalf of CCAOI, we thank the United Nations Department of Economic and Social Affairs (UNDESA) for the opportunity to submit our comments on the Zero Draft of the WSIS+20 Review Outcome Document (hereinafter referred to as "Zero Draft").

CCAOI is an India based civil society organisation engaged in capacity building, research and policy advocacy in the domain of Internet and digital policies. We represent the interest of a broad spectrum of stakeholders across India's Internet ecosystem, including connected and unconnected users.

We appreciate that the Zero Draft is comprehensive in reaffirming the principles of the Geneva Declaration, the Tunis Agenda, the Global Digital Compact, and the 2030 Agenda for Sustainable Development. Its emphasis on multistakeholderism, digital inclusion, human rights, and sustainable development is both timely and commendable.

That said, we respectfully submit that several aspects require further strengthening to ensure the vision of a people-centred, inclusive, and development-oriented Information Society is effectively realised.

We appreciate this inclusive process and look forward to continued engagement in shaping a forward-looking, equitable, and rights-based digital future.

With Regards,

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CCAOI's Recommendations to WSIS+20 Zero Draft

The Zero Draft effectively grounds itself in continuity by reaffirming the Geneva Declaration, the Tunis Agenda, and subsequent UN resolutions including the Global Digital Compact. This demonstrates a strong consistency in upholding core values such as multistakeholderism, meaningful cooperation and engagement, human rights, and a development-oriented approach. Such reaffirmation is significant, as it highlights that WSIS is building on two decades of progress and not starting anew but is building on a two-decade foundation. It also ensures that digital policy remains firmly anchored in international law and broader global frameworks such as the 2030 Agenda for Sustainable Development.

The draft notably emphasizes the importance of human rights. This rights-based approach to the development and governance of digital technologies is a welcome and essential step, showcasing a deliberate focus on protecting and promoting human rights within the evolving digital ecosystem

At the same time, the draft openly acknowledges that, despite significant progress in connectivity, major gaps persist both between and within countries. By highlighting gender divides, rural-urban disparities, and accessibility barriers faced by persons with disabilities, Indigenous People, and marginalised communities, the draft demonstrates inclusiveness. The emphasis on affordability, local content in multiple languages, and digital literacy is crucial. These elements go beyond mere access and address meaningful use, which has long been a missing piece in connectivity discussions.

Another strong point is the recognition of digital public goods such as open-source software, open data, and open AI models, alongside digital public infrastructure, as essential foundations for equitable digital transformation. This demonstrates forward-looking thinking, especially relevant for developing economies. By emphasizing investment, interoperability, and locally driven models, the draft underscores pathways to reduce dependency on a small number of global private actors. This framing resonates well with contemporary debates on digital sovereignty and inclusivity.

The draft also explicitly affirms that the same rights that apply offline must be protected online, reinforcing established UN positions. It acknowledges harms such as online gender-based violence, disinformation, surveillance abuse, and threats to journalists, while committing to safeguards, redress mechanisms, and accountability. By anchoring digital development within human rights frameworks, the draft ensures that technology is seen not only as a driver of growth but also as a space where fundamental freedoms must be upheld.

Equally significant is the decision to make the Internet Governance Forum (IGF) a permanent UN forum and recognising the role of National and Regional IGFs.

The rejection of state-controlled or fragmented Internet models reinforces the importance of an open, global, and interoperable Internet, directly addressing growing geopolitical tensions around "splintered Internet" proposals.

Finally, the draft takes an appropriately cautious yet proactive stance on emerging technologies, particularly artificial intelligence. It recognises risks to employment, human rights, and information integrity while proposing constructive initiatives such as a UN AI Research Programme, capacity-building fellowships, and a global scientific panel on AI. By focusing on Global South participation, it attempts to counterbalance the dominance of advanced economies in AI governance debates, signalling that AI must be governed collectively and responsibly.

The text also acknowledges both the positive and negative environmental impacts of ICTs. It highlights their role in climate resilience and smart systems, while pointing to energy use, e-waste, and unsustainable resource extraction as urgent concerns. Calls for standards on sustainable design, reuse, and recycling reflect a welcome shift towards a circular economy approach, striking a balance between innovation and responsibility.

Sharing below some of our key observations and feedback/suggestions:

1. **Limited Accountability Structures**

    The draft's proposals lean heavily on voluntary cooperation among stakeholders. While multistakeholderism is reaffirmed, there is no clear accountability framework to ensure that powerful actors, whether states or large technology companies, are actually bound by these commitments. For example, although the draft calls on the private sector to respect human rights, it provides neither enforcement mechanism nor clarity on how responsibilities are to be distributed across different stakeholders.

    Paragraph 83 of the draft states that - "We recognise the responsibilities of all stakeholders in this endeavour. We call on the private sector and all relevant stakeholders to ensure that respect for human rights is incorporated into the conception, design, development, deployment, operation, use, evaluation and regulation of all new and emerging digital technologies and to provide for redress and effective remedy for the human rights abuses that they may cause, contribute to, or to which they may be directly linked. We also call on the private sector to apply the United Nations Guiding Principles on Business and Human Rights".

    The above, in order to incorporate an enforcement mechanism, can be restructured in the following manner:

"We recognise the responsibilities of all stakeholders in this endeavour. We require the private sector and all relevant stakeholders to incorporate respect for human rights into the conception, design, development, deployment, operation, use, evaluation and regulation of all new and emerging digital technologies. Member States shall establish independent oversight bodies at the national or regional level to monitor compliance, investigate alleged abuses, and enforce penalties for non-compliance. Clear guidelines shall be implemented to ensure that affected individuals have access to accessible and effective redress and remedy mechanisms, including judicial, non-judicial, and administrative avenues. The private sector is legally obligated to apply the United Nations Guiding Principles on Business and Human Rights, with annual public reporting and third-party audits as part of regular accountability. Persistent failure to comply may result in sanctions, including fines or suspension of digital services, as determined by the oversight bodies."

2. **Insufficient Attention to Power Imbalances**

Paragraph 4 of the draft highlights how including governments from developing countries and other relevant actors is vital for achieving the WSIS vision. Realizing this goal requires focused efforts on building capacities, facilitating technology sharing, and investing financial resources to promote fair access and foster innovation, particularly for the unique needs of countries facing specific challenges. Paragraph 5 of the draft acknowledges that many developing nations encounter significant financial, technical, and institutional obstacles to fully engaging in global digital governance and policy discussions. It encourages governments and other stakeholders to make decision-making processes regarding the Information Society accessible for developing countries but does not specify how these barriers should be eliminated. Paragraph 35 of the draft recognizes that to achieve equitable and meaningful inclusion in the digital economy, initiatives must address the concentration of technological capacities and market dominance. This is necessary to fairly share the benefits of digital cooperation and prevent these benefits from increasing existing inequalities or hindering sustainable development for all regions.

However, none of the above provisions directly commit to fixing structural inequities. Although inclusivity and Global South participation are acknowledged, the draft falls short in addressing the structural inequities that persist in global digital governance. Simply invitations to developing countries to participate is insufficient when financial, technical, and institutional barriers remain deeply entrenched. Greater emphasis should have been placed on redistributive mechanisms, technology transfer, and ensuring equitable influence in governance forums that are often dominated by advanced economies and large corporations.

3. Weak Treatment of Data Governance

The draft's discussion on data governance primarily focuses on integrating the Global Digital Compact (GDC) commitments into the WSIS framework, with specific roles assigned to UN bodies such as the Commission on Science and Technology for Development (CSTD) and the Economic and Social Council (ECOSOC) to oversee implementation and coordination.

While these sections (around paragraphs 58, 59, and 60) recognize the importance of advancing data governance and digital cooperation, the treatment remains superficial. There is insufficient substantive detail on key issues like cross-border data flows, interoperability standards, and safeguards against state and corporate overreach. Given that data underpins economic power and drives surveillance practices in today's digital landscape, without more robust and concrete guidance, the draft risks leaving this critical aspect of the digital ecosystem inadequately addressed.

4. Fragmented Approach to AI Governance

The draft takes constructive steps by proposing the establishment of an Independent International Scientific Panel on Artificial Intelligence and enhancing research capacity, particularly focusing on the Global South. These initiatives aim to promote scientific understanding and foster global dialogue on AI governance within the UN system.

However, the draft falls short in setting clear principles or binding obligations for responsible AI governance. While references to existing UN processes provide a useful framework, the text lacks specificity regarding the integration of AI governance with human rights protections, labor standards, and international trade rules. This omission risks relegating AI governance to an aspirational objective rather than a coordinated, enforceable global priority, leaving significant gaps in addressing the multifaceted implications of AI deployment (paras 63, 64).

5. Interaction of IGF and WSIS with UN Digital Cooperation Structures

Para 115 states that IGF will be recognised as a permanent forum for the UN. This recognition is a major step forward, but the draft leaves open questions about how it will interact with other UN digital cooperation structures. Without clarity, there is a risk of duplication, institutional overlap, or inefficiency.

Currently, the draft states: "We decide that the Internet Governance Forum shall be made a permanent forum of the United Nations." We recommend restructuring this to: "We decide that the Internet Governance Forum shall be made a permanent forum of the United Nations for open and inclusive multistakeholder discussion of Internet and digital governance-related public policy issues."

6. **Internet Shutdowns and Access to the Internet**

Para 88 stresses the importance for all Member States, and stakeholders as appropriate, to promote universal, free, open, interoperable, safe, reliable and secure use of and access to the Internet by facilitating international cooperation, respecting and protecting human rights, and refraining from undue restrictions such as Internet shutdowns, arbitrary or unlawful surveillance, or online censorship. However, the draft does not directly address the increasing use of Internet shutdowns and digital authoritarian practices by governments, which are concrete threats today.

7. **Limited Follow-Up and Review Mechanisms**

Through Paras 75, 76 and 77, the draft outlines periodic reporting and review processes but lacks binding timelines, measurable targets, or consequences for non-compliance. The history of WSIS demonstrates that without strong follow-up, progress is uneven and slow. A more concrete monitoring system with benchmarks, independent reviews, and stakeholder scorecards would strengthen implementation and credibility.

8. **Funding Mechanism for IGF**

While the draft through paragraph 115 confirms the IGF as a permanent United Nations forum, it falls short of specifying clear and sustainable funding mechanisms to support its expanded mandate and operational needs. Historically, the IGF has faced financial uncertainties that have limited its effectiveness and stability. To fulfil its potential as a transformative platform, the establishment of a predictable and diversified funding framework is essential. This could encompass assessed contributions from UN member states and multi-stakeholder pooled funds. Without such concrete funding provisions, the permanency of the IGF and its intersessional work risks remaining symbolic rather than enabling meaningful and sustained impact.