

GFMD Submission to the WSIS Zero Draft Consultation process

3 October 2025

With this submission, the [Global Forum for Media Development \(GFMD\)](#) wishes to express its appreciation for the opportunity to share its remarks and **contribute to strengthening independent journalism and public interest media within** the WSIS framework. Additionally, we would like to note that GFMD fully endorses the points articulated in the [Global Digital Rights Coalition for WSIS's submission](#).

The Zero Draft, in its current form, represents significant progress in recognizing many of the issues raised during the previous consultation process. We welcome this progress and strongly believe that key language should be preserved and reflected in the Outcome Document. In particular, the following references are crucial and should be retained:

1. The **centrality of human rights** (paras. 77–93) and anchoring the WSIS in international law (paras. 77, 78, 79 and 82), including explicit references to Articles 19 and 29 of the UDHR (paras. 85 and 87);
2. **Respecting [media independence](#)** and safeguarding journalists, media workers, whistleblowers, human rights defenders and other civil society actors from digital and real life threats(para. 90);
3. The **multistakeholder nature of WSIS** and the call for international cooperation on issues relating to digital technologies (paras. 3 and 120);
4. Recognition of the **open**, free, global, interoperable, reliable and secure nature of the **Internet** and the rejection of state-controlled or fragmented internet architectures (paras. 104 and 106);
5. The **permanent status** of the Internet Governance Forum (para. 115);
6. The acknowledgement of **digital public goods and digital public infrastructure** as critical drivers of transformation and innovation, and the need to increase investment in these areas (para. 20).

GFMD deeply appreciates the engagement of the co-facilitators throughout the multi-stakeholder consultation process. We would like to emphasise that, in the upcoming phase, many non-state actors, including media organisations and journalists, may have limited resources and capacity to further engage. To maintain an open dialogue with all interested parties, and in the spirit of the WSIS people-centred approach, we call on the co-facilitators to **consider organising a dedicated consultation with media and journalists**, given that information and communication are at the cornerstone of the WSIS framework. **GFMD stands ready to assist in organising such consultations.**

In the following pages, we propose ways to reinforce certain elements of the current text by drawing directly on relevant UNGA resolutions, most of which are already reflected in the Zero Draft.

Thank you for your consideration.

Sincerely,

The GFMD Team

Media Independence, Safety of Journalists and Freedom of Expression

Zero Draft	New Wording	UNGA References and Explanation
<p>Para. 28 We are determined to ensure the achievement of universal meaningful and affordable access to the Internet and digital services, including the availability of networks offering higher capabilities, the affordability of access, data and devices, the availability of content and services that respond to users' priorities and needs, the extent to which these are multilingual, and the capabilities and resources required to make effective use of them, including information literacy, and to ensure that no one will be left behind in the Information Society.</p>	<p>We are determined to ensure the achievement of universal meaningful and affordable access to the Internet and digital services, including by improving access to information, and by seeking, receiving and imparting information and ideas of all kinds, and the availability of networks offering higher capabilities, the affordability of access, data and devices, the availability of digital media, content and services that respond to users' priorities and needs, the extent to which these are multilingual, and the capabilities and resources required to make effective use of them, including information literacy, and to ensure that no one will be left behind in the Information Society that is safe and secure for all users that ensures their mental health and well-being by calling on digital technology companies and social media platforms to enhance the transparency and accountability of their systems, including terms of service, content moderation and recommendation algorithms and handling of users' personal data in local languages, to empower users to make informed choices and provide or withdraw informed consent.</p>	<p>A/RES/78/213 (preamble) GDC, para.31 and para.36 WSIS +10, para.24</p> <p>Note: Note: In the section on bridging digital divides, and throughout the Zero Draft (paras. 12, 18, and 30), the recognition of cultural and linguistic diversity underscores the important role of local media and content producers, placing particular focus on their contribution. This intervention for inclusion of digital media as a source of local content, and calls for heightened accountability of digital technology companies to ensure the protection of individuals when using their systems.</p>
<p>Para.89 We express deep concern regarding the development of technologies and practices that facilitate surveillance that may jeopardise the right to privacy. We call on Member States to ensure that targeted surveillance technologies are only used in accordance with the human rights principles of legality, necessity and proportionality, and that legal mechanisms of redress and effective remedies are available for victims of surveillance- related violations and abuses.</p>	<p>We express deep concern regarding the development of technologies and practices that facilitate surveillance that may jeopardise the right to privacy. We call on Member States to refrain from or cease the use of surveillance technologies that are impossible to operate in compliance with international human rights law and ensure that targeted surveillance technologies are only used in accordance with the human rights principles of legality, necessity and proportionality, and that legal mechanisms of redress and effective remedies are available for victims of surveillance related violations and abuses. We call on Member States to review their procedures, practices and legislation regarding the surveillance of communications, their interception and the collection of personal data, including mass surveillance, interception and collection, with a view to upholding the right</p>	<p>A/RES/78/213, para. 16, 20(b) A/RES/69/166, para. 4(c) WSIS+10, para.46</p> <p>Note: Surveillance technologies, as mentioned, threaten the right to privacy but also other human rights. The use of these technologies needs to be aligned with the international human rights law and Member states need to review their procedures to ensure this compliance.</p>

to privacy and other human rights by ensuring the full and effective implementation of all their obligations under international human rights law.

Para. 90 We underscore the need to respect the independence of media, including digital media. We express particular concern about increased threats to the safety of journalists. In this context, we reaffirm that digital transformation must serve to uphold and advance, not restrict, fundamental rights and freedoms. We emphasise the crucial importance of safeguarding journalists, media workers, whistleblowers, human rights defenders and other civil society actors, who are increasingly targeted through digital means. We call on all stakeholders to prevent and respond to online and offline threats, including harassment, mass surveillance, and arbitrary detention linked to their legitimate activities.

We underscore the need to respect the independence of media, including digital media. We express particular concern about increased threats to the safety of journalists. We reaffirm that digital transformation must serve to uphold and advance, not restrict, fundamental rights, freedoms. We emphasise the crucial importance of safeguarding journalists, media workers, whistleblowers, human rights defenders and other civil society actors, who are increasingly targeted through digital means and **we emphasize that, in the digital age, encryption and anonymity tools have become vital to freely exercise their work and their enjoyment of human rights, including to secure their communications and to protect the confidentiality of their sources.** In this context, we **urge Member States not to interfere with the use by journalists and media workers of such technologies and to ensure that any restrictions thereon comply with the obligations of States under international human rights law.** We call on all stakeholders to prevent and respond to online and offline threats, including harassment, mass surveillance, and arbitrary detention linked to their legitimate activities.

A/RES/78/213, para. 15, 17
WSIS+10, para.45
GDC, para. 35

Note 1.
The reference to the need to respect media independence and safety of journalists as a way to uphold and advance digital transformation must be preserved.

Note 2.
The Zero Draft underscores the negative impact of safety threats on media workers and human rights defenders. Through this intervention, **we wish to highlight specific tools, such as encryption, that are essential for the professional activities of these actors.**

<p>Para.91 We recognize that digital and emerging technologies can facilitate the manipulation of and interference with information in ways that are harmful to societies and individuals, and negatively affect the enjoyment of human rights and fundamental freedoms as well as the attainment of the Sustainable Development Goals. We will work together to promote information integrity, tolerance and respect in the digital space, as well as to protect the integrity of democratic processes. We will strengthen international cooperation to address the challenge of misinformation and disinformation and hate speech online and mitigate the risks of information manipulation in a manner consistent with international law.</p>	<p>We recognize that digital and emerging technologies can facilitate the manipulation of and interference with information in ways that are harmful to societies and individuals and negatively affect the enjoyment of human rights and fundamental freedoms as well as the attainment of the Sustainable Development Goals. We underline the importance of free, independent, plural, and diverse media and of providing and promoting access to independent, fact-based information to counter disinformation and misinformation.</p> <p>We will work together to promote information integrity, tolerance and respect in the digital space, as well as to protect the integrity of democratic processes. We will strengthen international cooperation, including with technology companies, national human rights institutions and civil society to address the challenge of misinformation and disinformation and hate speech online and mitigate the risks of information manipulation in a manner consistent with international law.</p> <p>We encourage online platforms, social media companies, to review their business models and ensure that their design and development processes, their business operations, data-collection and data-processing practices are in line with the Guiding Principles on Business and Human Rights and we emphasize the importance of conducting human rights due diligence of their products, particularly of the role of algorithms and ranking systems in amplifying disinformation and hate speech in line with international human rights law.</p>	<p>A/RES/78/213, para. 13,14,7 A/RES/76/227, para. 2, 13 GDC, para.35, 36(a)(c)</p> <p>Note 1. Free, independent and diverse media are the antidote of disinformation and misinformation and it is crucial to acknowledge this connection.</p> <p>Note.2. Expanding the list of stakeholders that should work together to strengthen information and democratic integrity.</p> <p>Note 3. Social media companies business models and data practices can seriously hamper free flow of information and amplify disinformation. For this reason, it is essential to encourage these companies to conduct regular assessments to address these challenges. Please note that the verbatim language is already included in A/RES/76/227, para.11</p>
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Human Rights Safeguards, Enabling Environment, and Accountability Framework

Zero Draft	New Wording	UNGA References and Explanation
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<p>Para.58 We note the importance of legal and regulatory frameworks concerned with the deployment of digital services including those concerned with market structure, digital transactions, data protection and data privacy, consumer rights and intellectual property, human rights and environmental impacts.</p>	<p>We note the importance of the creation of transparent, independent, and non discriminatory legal and regulatory frameworks, proportional taxation, licensing fees, access to finance, facilitation of public-private partnerships, multi-stakeholder cooperation, infrastructure-sharing models, community-based approaches concerned with the deployment of digital services, including those concerned with market structure, existing concentrations of technological capacity and market power digital transactions, data protection and data privacy, consumer rights and intellectual property, human rights and environmental impacts with effective sanctions and appropriate remedies, that protects individuals against violations and abuses of their human rights in the digital context.</p>	<p>A/REC/78/213, para.3(a) Global Digital Compact, para.8 (f) A/RES/70/125, para.29</p> <p>Note: This proposal expands the concept of “enabling environment” by referencing multi-stakeholder cooperation and community-based approaches, including the importance of addressing market power and structure, accompanied with relevant human rights safeguards.</p>
<p>Para. 80. We recall the adoption by the General Assembly of resolution 78/213 on 22 December 2023, which set out principles and actions concerning the promotion and protection of human rights in the context of digital technologies, and commit to respect, protect and promote human rights in the digital space. We will uphold international human rights law throughout the life cycle of digital and emerging technologies, so that users can safely benefit from digital technologies and are protected from violations, abuses and all forms of discrimination.</p>	<p>We recall the adoption by the General Assembly of resolution 78/213 on 22 December 2023, which set out principles and actions concerning the promotion and protection of human rights in the context of digital technologies, and commit to respect, protect and promote human rights in the digital space. We recognize the need for accountability and effective measures to prevent, mitigate and remedy potential and adverse human rights impacts of digital technologies and we will uphold international human rights law throughout the life cycle of digital and emerging technologies, so that users can safely benefit from digital technologies and are protected from violations, abuses and all forms of discrimination.</p>	<p>A/RES/78/213</p> <p>Note: As the Zero Draft rightly recalls, digital technologies and private actors must be held accountable for any adverse human rights impacts in line with international human rights law. Paragraph 80 should serve as an anchoring provision for the introduction and development of the digital technology accountability framework, which is further referenced in paragraphs 81 and 83.</p>

<p>Para. 81 We commit to establish appropriate safeguards to prevent and address any adverse impact on human rights arising from the use of digital and emerging technologies and protect individuals against violations and abuses of their human rights in the digital space, including through human rights due diligence and establishing effective oversight and remedy mechanisms.</p>	<p>We commit to establish appropriate safeguards to prevent and address any adverse impact on human rights arising from the use of digital and emerging technologies and protect individuals against violations and abuses of their human rights in the digital space, including through regular, comprehensive human rights impact assessments of digital technologies, human rights due diligence, including effective oversight, and remedy mechanisms.</p>	<p>A/RES/69/166,para.4 A/RES/79/125, para.6 A/RES/78/213, para. 20 (a)</p> <p>Note: Further specifying appropriate safeguards to prevent and address human rights issues, in particular human rights due diligence, domestic and human oversight, and remedy mechanism.</p>
<p>Para. 83 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 Right</p>	<p>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, sale, procurement and regulation of all new and emerging digital technologies in order to prevent and mitigate their adverse human rights impacts, and ensuring effective remedies as well as human oversight, accountability and legal responsibility. This should include 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.</p>	<p>A/RES/78/213, para.20(a) GDC, para. 25 and para. 35 Also, see: A/REC/79/175 para.8(h)</p> <p>Note: Paragraph 83 should function as an anchoring paragraph for the introduction and further development of corporate accountability consistent with United Nations policy frameworks.</p>

<p>New Para.87bis</p>	<p>We urge all Member States and, where applicable, other stakeholders to prevent harm to individuals caused by digital technologies, including artificial intelligence applications, and to refrain from or cease the use of digital technologies that are impossible to operate in compliance with international human rights law or that pose undue risks to the enjoyment of human rights, unless and until the adequate safeguards to protect human rights and fundamental freedoms are in place.</p>	<p>We propose a new paragraph to specifically address Internet shutdowns and restrictions. This proposal is supported by A/RES/78/213, para. 20(b), para. 12, including A/RES/78/265, para.5; A/HRC/RES/59/11, para 4; and A/HRC/RES/58/23, para.9b.</p> <p>Note: The new paragraph underscore the need to explicitly recognise that certain technologies are not justified under international human rights law, including the narrowly defined tests of necessity, proportionality, legality, and legitimacy.</p>
<p>New Para. 88bis</p>	<p>Member States should refrain from imposing restrictions on the free flow of information and ideas that are inconsistent with relevant obligations under international law, including articles 19 and 20 of the International Covenant on Civil and Political Rights, through practices such as the use of Internet shutdowns and online censorship to intentionally prevent or disrupt access to or the dissemination of information, including through the use of blocking, throttling or filtering measures, and from using digital technologies to silence, unlawfully or arbitrarily surveil or harass individuals or groups, including in the context of peaceful assemblies.</p>	<p>We propose a new paragraph to specifically address Internet shutdowns and restrictions. This proposal is supported by A/RES/78/213, para.21 and A/HRC/RES/57/29, para.9</p> <p>Note: In parallel to the para.87, this proposal emphasises the responsibility of Member States to refrain from restrictions beyond those already stipulated in the para. 87.</p>