

## GNI Submission to the WSIS+20 Zero Draft Consultation

The [Global Network Initiative](#) (GNI) is the leading multistakeholder forum for accountability, shared learning, and collective advocacy on government and company policies and practices related to technology and human rights. GNI is a [membership](#) organization comprising over 100 academics, civil society organizations, investors, and technology companies. We have members on every populated continent, with nearly one-third based in the majority world.

GNI has [participated](#) in past consultations part of the World Summit on the Information Society +20 Review Process (WSIS+20), including the [Open Consultation Process](#) held in March 2025, the [virtual](#) Stakeholder Consultations held in June 2025, and the consultation to the [Elements Paper](#). We are a member of the [Global Digital Rights Coalition](#) and endorse the group's [submission](#) to this consultation. We are also a signatory to the cross-stakeholder [“five-point plan”](#) and [“eight recommendations”](#) for an inclusive WSIS+20 review. We thank the Co-Facilitators and the WSIS Secretariat for continuing to provide opportunities to participate in the consultations and anticipate positive and rights-respecting developments in Internet Governance.

### Overview

GNI welcomes the Zero Draft of the WSIS+20 Review. The draft is a positive step forward building on the Elements Paper, incorporating key issues raised by civil society, technical community actors, and other stakeholders. We commend its alignment with the Global Digital Compact (GDC) and the Sustainable Development Goals (SDGs).

The draft reflects a growing global consensus on the importance of human rights, accountability, multistakeholder governance, and digital inclusion. We highlight the following areas that we believe are critical to defend in the draft and provide recommendations to strengthen the text further to ensure concrete, resourced, and holistic strategies to implement its commitments.

### Key Areas to Defend and Recommendations

**Human Rights (1, 9, 10, 13, the second sentence of paragraph 15, and paragraphs 77, 78, 79, 80, 81, 82, 84, 85, 87, 89, 90, 92 and 131.)**

The extensive and comprehensive language on human rights in the Zero Draft is welcome and should not be diluted during negotiations. The text can be further strengthened through:

- Explicitly referencing that any limitation to freedom of expression and privacy must be subject to the principles of necessity, proportionality, and legality as established by international human rights law.
- Bringing additional guarantees of human rights safeguards across the text, particularly in the paragraphs on digital public infrastructure, data governance, and AI.

#### **Internet Governance Forum (IGF) (para 115)**

It is positive that the Zero Draft has incorporated recommendations from various stakeholder groups and provides the IGF a permanent mandate through Para 115, while also acknowledging the importance of strengthening national and regional IGFs. This should not be diluted during negotiations. The text can be strengthened through:

- Recognizing the IGF as the primary forum for discussion of Internet Governance and emerging digital public policy issues, including new and emerging technologies.
- Acknowledging the evolution of the scope of the field of Internet governance and the role of the IGF to avoid isolating internet governance and the IGF from broader digital technologies policy and governance issues as they evolve.
- Instructing UN DESA, along with the global internet community, to establish a sustainable funding mechanism for the IGF.

#### **Internet Governance (para 103 - 108)**

The Zero Draft establishes a strong foundation for Internet Governance, especially paragraph 104, which explicitly rejects models of state-controlled or fragmented Internet architectures and commits to maintaining an open, global, free, interoperable, reliable, and secure internet.

#### **Private Sector Accountability (para 83)**

GNI welcomes the recognition of the private sector's role in para 83 and the reference to the [UN Guiding Principles on Business and Human Rights](#) (UNGPs). The text could be strengthened by:

- Referencing the responsibility of companies to conduct human rights due diligence (HRDD) and human rights impact assessments (HRIA) throughout the product lifecycle, when developing and implementing policies, and when moving into new markets.
- Emphasizing the need for transparency, independent oversight, and remedy, especially in relation to content moderation, algorithmic systems, and surveillance.

Strong language on private sector accountability and recognition of the UNGPs is essential for establishing a clear standard and shared understanding of the commitments and responsibilities expected from the private sector. This supports and enhances the efforts of organizations and individuals working toward responsible business conduct. For example, GNI members have implemented these principles through transparency reporting and HRDD, as demonstrated by the [GNI Principles on Freedom of Expression and Privacy](#) and its related [Implementation Guidelines](#), GNI's unique [accountability mechanism](#), and associated [Public Assessment Reports](#).

### **Multistakeholder Approach**

The Zero Draft contains strong references to a multistakeholder approach to Internet Governance throughout the document. To guide the values and principles of multistakeholderism, the text can be strengthened by making explicit reference to the [NETMundial+10 São Paulo Guidelines](#) in paragraphs 3 and 120.

### **Implementation and oversight of the WSIS Action Lines and alignment with GDC (128, 129, 130)**

The proposal to align WSIS Action Lines with the GDC and SDG frameworks is a welcome first step and should be retained. The Zero Draft could be strengthened through:

- Explicitly task Action Line facilitators with developing implementation roadmaps, including indicators and metrics (Para 128 & 129)
- Request, rather than call on, the OHCHR to play a role in implementing the Action Lines and ensure that the OHCHR has the resources and mandate to mainstream human rights across all Action Lines.(para 130)
- Further clarify the role of other key agencies including UN-Women, and ODET, amongst others.

- Reporting should be through UNGIS to the Commission on Science and Technology for Development (CSTD) and integrated into the annual WSIS resolution, for consideration by ECOSOC.

#### **Internet Shutdowns and Information Control (para 88, new 88bis)**

GNI supports the language in the Zero Draft which stresses the importance for Member States, and other stakeholders as relevant, to promote universal, free, open, interoperable, safe, reliable and secure use of and access to the Internet. Additionally, GNI recommends further strengthening of the paragraph by adopting new para 88bis, which explicitly:

- Recognizes that some digital technologies, including some applications and uses of artificial intelligence can never be justified under international human rights law.
- Condemns Internet shutdowns and other forms of network interference (e.g., throttling, blocking, filtering),
- Reaffirms that such practices violate rights under international human rights law, especially Articles 19 and 20 of the ICCPR.

GNI has worked [extensively](#) on the impact of shutdowns and digital censorship to human rights defenders, journalists, and marginalized communities and believes the issue must be categorically addressed in the outcome document.

#### **Equitable Participation (para 4, 35, 48, 96, 106, 121)**

The Zero Draft recognizes the need for equitable participation of governments and all stakeholders in the WSIS framework and Internet Governance. This is welcome and should not be diluted during negotiations. The text can be further strengthened by explicitly referencing challenges that different stakeholders face to participation and that need to be overcome, including resources, capacity, and process constraints.

#### **Human Rights-Based Data Governance (paras 94, new 95bis)**

GNI welcomes the Zero Draft's attention to open, inclusive, and rights-respecting data governance frameworks, including protections for privacy, accountability in data use, and the promotion of equitable access and participation. To strengthen the text, the Zero Draft can

- Emphasize the need for participatory governance, community control, and consent-based data use, particularly in AI and DPI systems.

- Encouraging a “data justice” approach that centers equity and social inclusion by ensuring that developing countries, marginalized communities, and Indigenous Peoples not only have access to data systems but also decision-making power over how data that affects them is collected, processed, and used, including in AI systems, through the recognition of their knowledge systems, respect for their own forms of governance, and their full, informed, and effective participation.

### **Accountable and Inclusive Digital Public Infrastructure (Paras 20, 76)**

The Zero Draft recognizes the critical role of Digital Public Infrastructure (DPI) in advancing inclusive, rights-based digital ecosystems, including the importance of openness, accessibility, and interoperability. The Zero Draft can be further strengthened by:

- Requiring DPI to be human rights-compliant by design, incorporating privacy, transparency, and user control safeguards.
- Supporting community-led connectivity and universal service funds, as key strategies to expand affordable access.
- Linking DPI efforts with Digital Public Goods (DPGs) frameworks and reinforcing public oversight mechanisms.

### **Artificial Intelligence (AI) (new 102bis)**

We welcome the Zero Draft’s inclusion of artificial intelligence (AI) and encourage further strengthening through clearer operational guidance and stronger human rights safeguards. AI should be developed, deployed, and governed in alignment with international law, including international human rights law, with a clear obligation to cease the use of systems that are incompatible with these standards (see A/RES/78/265, para 5). To promote responsible and sustainable AI use, we recommend:

- Ensuring the WSIS+20 outcomes reinforce corporate responsibility and platform accountability for upholding human rights in AI systems including adoption of the UNGPS in the context of AI. Strengthen human rights safeguards across related sections, including Digital Public Infrastructure (OP 20), Digital Public Goods, and data governance.
- Facilitating information-sharing between the UN Independent International Scientific Panel on AI and UN-affiliated environmental bodies, such as the IPCC, to assess and mitigate AI-related environmental risks, including energy use, emissions, and resource extraction. This supports a human rights-based and sustainable development approach in line with the SDGs and the 2030 Agenda.

- Providing clearer guidance on how AI governance will be operationalized within the broader WSIS architecture. Clarify interactions between the WSIS framework, CSTD, ECOSOC, UNGIS, the GDC, IGF, ODET, the UN AI Panel, and the Global AI Dialogue, to ensure coherence and avoid duplication.
- Requesting that relevant Action Line facilitators incorporate AI into their workplans, with a focus on inclusive multistakeholder participation and capacity-building, particularly in the Global South, and in line with GDC commitments.

## **Financing**

While the Zero Draft acknowledges the importance of financing digital development, much of the language remains high-level and lacks operational clarity. To address the longstanding financing gap from the second phase of WSIS and ensure meaningful implementation of its objectives, more concrete action is needed, including:

- Establishing a dedicated taskforce to explore and propose practical financing mechanisms, building on the outcomes of the [UN's 2025 Financing for Development Conference](#).
- Developing innovative and blended financing models in collaboration with governments, multilateral development banks, international organizations, and the private sector, with a focus on sustainability and equity.
- Ensuring companies respect and uphold human rights, including the UNGPs while undertaking public and private partnerships and investing in development initiatives.
- Supporting and scaling public funding mechanisms, including universal access funds and community-led connectivity initiatives, especially in underserved and commercially unviable areas.

These measures are essential to ensure that financing strategies not only mobilize resources but also advance human rights, equity, and sustainable digital development.

## **Transparent, Inclusive, and Accountable WSIS+20 Process**

We appreciate the consultative and participatory nature of the WSIS+20 process so far. In particular, we welcome the:

- Establishment of the International Multistakeholder Sounding Board,
- Inclusion and bringing together of diverse stakeholders in consultations, and
- Adoption of civil society and technical community recommendations.

To maintain legitimacy and inclusivity:

- The WSIS+20 review should address the potential exclusion of key stakeholder groups from New York-based intergovernmental processes.
- The “Five-Point Plan” and “Eight Recommendations” for inclusion should be actively implemented in both the lead-up to and follow-up from WSIS+20.
- Continue to build on and recognize efforts taken at the national and regional levels. Examples include the Dar es Salaam Declaration and the Contonou Declaration in Africa, which emerged from processes led by the UN Economic Commission of Africa (UNECA). The Declarations highlight relevant priorities for Africa as well as contextualized targets and metrics. GNI and Global Partners Digital (GPD) have also collaborated with local partners to [conduct research](#) and raise awareness about the WSIS+20 review process in India, Bangladesh, Zambia, South Africa, Ghana, Chile, Colombia, and Brazil.

## Conclusion

GNI appreciates the opportunity to contribute to the WSIS+20 Zero Draft consultation. We urge the Co-Facilitators to continue leading an open, transparent, and inclusive process and to strengthen the draft’s alignment with international human rights standards and multistakeholder governance principles. As we move toward the WSIS+20 High-Level Meeting in December 2025, we look forward to continued engagement and collaboration to ensure a digital future that is open, inclusive, rights-respecting, and accountable.