Mozilla

Self-Assessment Report - Code of Practice on Disinformation – September 2019

In line with the Monitoring Program Schedule as presented in a letter from Director-General Roberto Viola to Mozilla dated 6 December 2018, we submit this self-assessment report on Mozilla's compliance with our commitments under the Code of Practice on Disinformation.

As a mission driven organisation, Mozilla is committed to working with relevant stakeholders to effectively thwart online disinformation and has signed on to the areas of the Code of Practice which are relevant to our own products and approaches to tackle disinformation. These commitments were included in the detailed Roadmap for the implementation of the Code of Practice we submitted to the European Commission in October 2018.

Milestone	Commitment	Description	Status
II.B. Political Advertising and Issue-Based Advertising			
Launch of the Mozilla Foundation's campaign on effective Ad Archive API's.	**4.** Devising approaches to publicly disclose "issue-based advertising".	*In our Roadmap, we committed "to make time and resources available to continue this work stream", in recognition of the role played by issue-based advertising in elections.* We believe that issue-based advertising plays an important role in disinformation, and this role needs to be better understood with appropriate research. To address this, we launched the Ad Archive API campaign. This campaign lists the baseline requirements (such as the content of the advertisement and targeting criteria) which researchers need from Ad Archive API's to better understand and document how disinformation spreads, including via issue-	Completed - March 2019.

		based ads. For more information, see [here]().	
II.D. Empowering consumers			
Launch of the Firefox EU Elections Toolkit by the Mozilla Corporation.	**7.** Invest in products, technologies and programs (...) to help people make informed decisions when they encounter online news that may be false. **9.** Invest in features and tools that make it easier for people to find diverse perspectives about topics of public interest. **11.** Encourage market uptake of tools that help consumers understand why they are seeing particular advertisements.	The [Firefox EU Elections Toolkit]() is a website where Internet users can find out how tracking and opaque election advertising affect people on the web and how they can protect themselves - e.g. through browser extensions, checked on and recommended by Firefox that support independent research and opinion making. The website also includes selected information about the EU elections as well as the EU as an institution - only using trustworthy sources. A [French]() and a [German]() version of the website are also available. For more information, see our blog post [here]().	Completed - May 2019.
Rollout of enhanced security features in the default setting of Firefox by the Mozilla Corporation.	**7.** Invest in products, technologies and programs (...) to help people make informed decisions when they encounter online news that may be false.	As purveyors of disinformation feed off of information that can be revealed about an individual's browsing behaviour, we rolled out enhanced tracking protection by default in Firefox. We expect this protection to reduce the exposure of users to the risks of being targeted by disinformation	Completed - June 2019.

		campaigns.	
	9. Invest in features and tools that make it easier for people to find diverse perspectives about topics of public interest. **11.** Encourage market uptake of tools that help consumers understand why they are seeing particular advertisements.	In June 2019, enhanced tracking protection was automatically set on by default for new users who installed and downloaded Firefox for the first time, thereby blocking known third-party tracking cookies. Existing users could turn it on themselves if they so wished. In September 2019, enhanced tracking protection was rolled out by default for all users worldwide on desktop and Android, thereby blocking third-party tracking cookies and cryptominers. On September 3rd, over 20% of Firefox users had enhanced tracking protection on. With enhanced tracking protection now on by default for all Firefox users worldwide, we expect that number to rise to 100% over a relatively short time frame. For more information, see our blog posts here and here.	
II.D. Empowering consumers & II.E. Empowering the research community			
Increased staff support in Europe to tackle disinformation.	10. Partner with civil society, governments, educational institutions, and other stakeholders to support efforts aimed at improving critical	The Mozilla Foundation has hired two full time employees to work on disinformation with a focus on the EU region. A communications lead, who devises efforts to educate EU citizens about disinformation, has started in January 2019 and is based in Berlin. The partnerships coordinator, who	Completed - Q1 2019

	thinking and digital media literacy. 12. Support good faith independent efforts to track disinformation and understand its impact.	works with a range of stakeholders and experts to forge pragmatic and informed approaches to tackle disinformation, started on March 2019 and is based in Brussels. The Foundation has worked on grassroots campaigns to educate EU residents about disinformation and the upcoming election. They have also been coordinating efforts with academic researchers and a range of advocacy and non-profit organisations across Europe. In particular, the Foundation has launched joint campaigns on transparency with 71 researchers (see above) and 37 civil society organisations. The latter was supported by over 11000 people in the EU. The Foundation has also created a dedicated webpage with a list of tools, background reading and campaigning resources for activists and organisations working to address misinformation.	
The Mozilla Foundation Fellowship Program - new cohort.	10. Partner with civil society, governments, educational institutions, and other stakeholders to support efforts aimed at improving critical thinking and digital media literacy.	The Mozilla Foundation 2018-9 fellowship cohort includes a number of projects focusing on disinformation: • Camille Francois, researching the effects of dis/misinformation spread on specific platforms in countries that have elections in 2018-2019; • Renee di Resta, investigating the spread of	Completed - Q1 2019.

	12. Support good faith independent efforts to track disinformation and understand its impact. 14. Encourage research into disinformation and political advertising.	disinformation and manipulated narratives across social networks; • Karen Kornbluh, working on creating a greater understanding among various stakeholders of the mismatch between today's policies and the new technologies that allow disinformation to propagate; • Clara Tsao, working on evaluating the effectiveness of online tools that have been developed to counter terrorist propaganda and disinformation. • Stefania Koskova, exploring strategies and tools to enhance collaboration between stakeholders and better management of security risks associated with harmful online content, such as hate speech, terrorist propaganda and disinformation, particularly in post-conflict societies; See full cohort here. We will continue to invest in this platform for technologists and policy experts to undertake actionable solutions-orientated research into some of the key challenges facing the internet ecosystem today. This action delivers on several commitments of the code, which include: supporting independent, cutting edge research into disinformation: development of tailored approaches on how best to tackle it; and enhancing media literacy and critical thinking through the dissemination of the research	

		developed throughout their fellowships.	
Mozilla Mornings Event and CPDP panel on disinformation and online advertising.	15. Convene an annual event to foster discussions within academia, the fact-checking community and members of the value chain.	The Mozilla Corporation organised, on 22 January 2019, a "Mozilla Mornings" event on "Disinformation and Online Advertising: an unhealthy relationship?" This event hosted MEP Marietje Schaake, Clara Hanot from the EU Disinfo Lab and Raegan MacDonald from Mozilla. The Mozilla Corporation organised for the Computers, Privacy and Data Protection conference (CPDP 2019), on 31 January 2019, a panel titled "Disinformation and online advertising: do we need to rethink the Internet's business model?". In addition Mozfest, the Mozilla Foundation's annual conference, will include a session on disinformation (October 2019)	Completed - Q1 2019.

Advertising Transparency

Alongside our work to fulfill our commitments under the Code of Practice on disinformation, we have dedicated additional time internally to work on advertising transparency. While advertising transparency alone won't solve online disinformation, we believe at Mozilla that it is one of the most critical pieces.

As mentioned above, the Mozilla Foundation and a cohort of independent researchers published on 27 March 2019 five guidelines explaining the functionalities and the list of data that Ad Archive APIs would need to provide in order to truly monitor violations of rules on electoral ads and campaign financing laws.

A few weeks later, we conducted assessments of some of the available Ad Archive APIs based on these guidelines ([here](#) and [here](#)). These assessments showed that the archives were at best incomplete, lacking in particular detailed targeting and engagement data on political and issue-based ads.

However, the experience of researchers and organisations fighting against disinformation has indicated that detailed targeting and engagement data on political and issue-based ads, as well as transparency for certain types of non-paid 'organic' public content data is crucial to allow for research into the creation of disinformation campaigns and their spreading across platforms. Only on the basis of such data can we create evidence-based policies to tackle issues of societal concern.

To achieve that goal in a GDPR-compliant way, we call on the Commission to urge the European Data Protection Board to issue guidelines on the research-exceptions in the GDPR in order to provide for more legal certainty in processing data for those purposes.

Conclusion

As a member of the high-level expert group on disinformation and a signatory of the Code of Practice, the fight against online disinformation has been one of our main priorities for the past year. While we welcome all that has been achieved since the adoption of the Code of Practice, we believe that more needs to be done to fully tackle online disinformation and truly empower individuals.

Protection and tools against online tracking, meaningful transparency of political ads and close collaboration with the academic community are of key importance. In particular, the implementation of the Code of Practice over the past year has demonstrated that more needs to be done to empower the research community to better understand the spread of disinformation online.

We call on the Commission to keep ensuring that the objectives of the Code of Practice are realised in practice through the implementation of effective mechanisms and transparency by the relevant signatories. We remain at your disposal for any further information and we look forward to continuing our collaboration to address the problem of disinformation in the EU.