



Public Comment Appendix for

2021-015-FB-UA

Case number

Case description

In June 2021, a Facebook user in the United States posted in a private group for adults with attention deficit hyperactivity disorder (ADHD). The post consists of text in English, with the user beginning the post by writing "CW" (content warning) on "Medication, addiction". The user identifies themselves as someone with ADHD and asks the group how to approach talking to a doctor about specific medication. The user states that the medication Adderall has worked for them in the past, while other medications "zombie me out", but they are concerned about presenting as someone with drug-seeking behaviour if they directly ask their doctor for a prescription. The post had comments from group members describing their own experiences and providing advice on how to explain the situation to a doctor. The group administrators are based in Canada and New Zealand.

Meta removed the content under Facebook's [Regulated Goods Community Standard](#). As a result of the Board selecting this case, Meta identified its removal as an "enforcement error" and restored the content. At the time of removal, the content had been viewed over 700 times, and it had not been shared. No users reported the content.

Under Facebook's Regulated Goods policy, Meta takes down content that "attempts to buy, sell or trade pharmaceutical drugs...[or] asks for pharmaceutical drugs except when content discusses the affordability, accessibility or efficacy of pharmaceutical drugs in a medical context".

In their appeal to the Board, the user stated that they are a patient seeking advice on how best to discuss an important issue with their doctor. The user called attention to the importance of having open and mature conversations on healthcare issues and issues of mental health.

The Board would appreciate public comments that address:

- Whether Meta's initial decision to remove the post was consistent with Facebook's Regulated Goods Community Standard and stated values.
- Whether Meta's initial decision to remove the post was consistent with the company's human rights responsibilities and commitments.
- How Meta's content moderation, including the use of automation, affects freedom of expression and access to information on healthcare, and how negative effects may be prevented or mitigated.

- The impact of Facebook's content policies and their enforcement on discussions about pharmaceutical drugs, as well as users' ability to share and discuss mental health issues, including the potential stigmatisation of mental health issues.
- The role and impact of social media on abuse of prescription drugs.

In its decisions, the Board can issue policy recommendations to Meta. While recommendations are not binding, Meta must respond to them within 30 days. As such, the Board welcomes public comments proposing recommendations that are relevant to this case.



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The Oversight Board is committed to bringing diverse perspectives from third parties into the case review process. To that end, the Oversight Board has established a public comment process.

Public comments respond to case descriptions based on the information provided to the Board by users and Facebook as part of the appeals process. These case descriptions are posted before panels begin deliberation to provide time for public comment. As such, case descriptions reflect neither the Board's assessment of a case, nor the full array of policy issues that a panel might consider to be implicated by each case.

To protect the privacy and security of commenters, comments are only viewed by the Oversight Board and as detailed in the [Operational Privacy Notice](#). All commenters included in this appendix gave consent to the Oversight Board to publish their comments. For commenters who did not consent to attribute their comments publicly, names have been redacted. To withdraw your comment, please email contact@osbadmin.com.

To reflect the wide range of views on cases, the Oversight Board has included all comments received except those clearly irrelevant, abusive or disrespectful of the human and fundamental rights of any person or group of persons and therefore violating the [Terms for Public Comment](#). Inclusion of a comment in this appendix is not an endorsement by the Oversight Board of the views expressed in the comment. The Oversight Board is committed to transparency and this appendix is meant to accurately reflect the input we received.



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16

Number of Comments

Regional Breakdown

0	4	4	0
Asia Pacific & Oceania	Central & South Asia	Europe	Latin America & Caribbean
2	0	6	
Middle East and North Africa	Sub-Saharan Africa	United States & Canada	

2021-015-FB-UA

Case number

PC-10281

Public comment number

United States and Canada

Region

Justin

Commenter's first name

Macy

Commenter's last name

English

Commenter's preferred language

National Association of Boards of Pharmacy

Organization

Yes

Response on behalf of organization

Short summary provided by the commenter

See attached.

Full Comment

See attached.

Link to Attachment

[PC-10281](#)