

Public Comment Appendix for

PAO 2023-01 Case number

Case description

This policy advisory opinion request concerns Meta's approach to moderating the Arabic word "shaheed" when referring to individuals it classifies as "dangerous," including terrorists. The word has multiple meanings but is often translated as "martyr," and accounts for more content removals under the Community Standards than any other single word or phrase on Meta's platforms. The company acknowledges that its current approach may result in significant overenforcement, particularly in Arabic-speaking countries, and has explored alternatives. However, it points to the difficulties and tensions in moderating use of the term at scale.

Meta estimates that the word "shaheed," and its variations, account for more content removals under the Community Standards than any other single word or phrase on its platforms.

In its request, Meta asks the Board whether it should continue to remove content using "shaheed" to refer to individuals designated as dangerous under its Dangerous Individuals and Organizations policy, or whether a different approach would better align with the company's values and human rights responsibilities. Meta also requests guidance on similar content issues that may arise in the future.

Meta says it removes content referring to designated dangerous individuals as "shaheed" because it translates the word as "martyr." It therefore considers it a form of praise. Praising a designated individual is prohibited under the Dangerous Individuals and Organizations policy. However, the company acknowledges that the meaning of "shaheed" varies.

In its request, Meta describes the word "shaheed" as an "honorific" term, used by many communities around the world, across cultures, religions, and languages. The company says the term has "multiple meanings" and is "used to describe someone dying unexpectedly or prematurely, at times referring to an honourable death, such as when one dies in an accident or in a conflict or war." Meta states that the common English translation is "martyr," and assumes this meaning for the purposes of content moderation, in all contexts. However, it notes that "there is no direct equivalent to the term in the English language."

The Dangerous Individuals and Organizations policy prohibits "praise, substantive support, or representation of designated entities and individuals." Its definition of praise includes, giving "a designated entity or event a sense of achievement," legitimizing "the cause of a designated entity," and aligning "oneself ideologically with a designated entity or event." This definition was added following a recommendation by the Board ("Nazi quote" case recommendation two). Because Meta assumes "shaheed" means "martyr," it is considered a form of praise when used to refer to a designated entity. The Board previously recommended that Meta publish its list of designated entities, or illustrative examples ("Nazi quote" case, recommendation three). Meta has not published the list and provided no further updates on this recommendation following a feasibility assessment.

Removal of the word "shaheed" can result in severe "strikes," or sanctions, for users. The company acknowledges that its current approach may result in significant over-enforcement, particularly in Arabic-speaking countries. Given the multiple meanings of "shaheed" and difficulties in accounting for context at scale, Meta accepts that it may be removing speech that is "not intended to praise a designated individual." For example, where "shaheed" is used to refer to a premature death or a deceased person, rather than to glorify their conduct. Meta does not apply its policy exception for neutral news reporting to the word "shaheed," as it assumes the word not to be neutral.

Because of these concerns, Meta initiated a policy development process in 2020 to reassess its use of the term "shaheed." This included a research review and stakeholder consultation. Meta describes as key findings of this stakeholder engagement that the meaning of "shaheed" depends on context, and that in some instances the term has become desensitized and disconnected from praise. During this process, Meta identified two scalable policy options for use of the word "shaheed." However, each had drawbacks, there was no consensus among stakeholders, and Meta did not settle on a new approach. The company emphasizes that due to the volume of content on its platform, a key practical concern is whether enforcement works at scale.

The Board requests public comments that address:

• Examples of how Meta's current approach to "shaheed" as praise impacts freedom of expression on Instagram and Facebook, especially for civil

society, journalists, and human rights defenders in regions where the word is commonly used.

- Research into the connection between restricting praise of individuals associated with terrorist organizations on social media and the effective prevention of terrorist acts.
- How Meta should account for the variety of meanings and diverse cultural contexts for using the term "shaheed" in different regions, languages and dialects, given the trade-offs inherent in enforcing content policies at scale, and the implications for Meta's responsibility to respect human rights.
- What processes and safeguards should be in place to mitigate the risks of under- or over-enforcement of the Dangerous Individuals and Organizations policy, in particular across diverse cultures, languages and dialects.
- How to measure the accuracy of policy enforcement in this area, including in the use of automation, to counter the potential for bias or discrimination, and how to reflect this in transparency reporting and/or enable independent researchers access to relevant data.



Public Comment Appendix for

PAO 2023-01 Case number

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 the 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 <u>Operational Privacy Notice</u>. 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 <u>contact@osbadmin.com</u>.

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 <u>Terms for Public Comment</u>. 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.



### Public Comment Appendix for

PAO 2023-01 Case number

101 Number of Comments

### Regional Breakdown



PAO 2023-01	PC-11201	United States & Canada
Case number	Public comment number	Region
Withheld	Withheld	English
Commenter's first name	Commenter's last name	Commenter's preferred language

### Withheld

Organization

Yes

Response on behalf of organization

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Summary Comment

National SJP is wholeheartedly opposed to Meta's silencing and censorship of Arab and Muslim communities as it moves to introduce a "wholesale ban" on the term "shaheed." As this approach is fueled by discrimination and prejudice as Meta's blanketed interpretation of the word completely warps the term's significant religious, political and cultural connotation inherent in many societal traditions.

Full Comment

The term "shaheed" is a nuanced term with varying significant meanings across a multitude of religious, cultural and political contexts. The banning of the term is entirely orientalist in nature as it depends on the distorted Eurocentric view of the term to inform Meta's new approach. It is through a misunderstanding and generalization of the Arabic language and the Islamic world that the term shaheed, according to Meta, is falsely used as a term to label those associated with the Dangerous Individuals and Organizations list. A shaheed, means a "witness" in Islam and is also used to refer to a martyr and applies to victims of state and ethno-political violence in the context of oppressive surroundings where what exists are acts of self-defense that defy and oppose colonial apartheid and military occupation. A martyr or shaheed cannot incite

violence when they are a victim of state sanctioned violence that is illegal according to international law. As mentioned previously, the censorship of the term "shaheed" is a result of the "violation" of Meta's Dangerous Individual and Organization (DIO) policy. However, there is an obvious and blatant overrepresentation of Arabs and Muslims in the DIO list. So, the over-moderation of the term and other related language, specifically targets Arab and Muslim communities through heavy-handed enforcement and hard restrictions resulting in valuable speech being censored and silenced. In the context of the occupation of historic Palestine and israeli apartheid, the victims are Palestinian civilians living under a brutal context of colonial apartheid. Through this unethical ban, Meta silences Palestinians who wish to honor their dead and does so by taking the side of the occupying power who continually violates and disregards international law. This violent censorship denies journalists, organizers and freedom defenders the right to conduct their work as they are confronted by Meta's content moderation policies. These policies are fueled by false narratives from the illegal occupying power and blatant prejudice against Arab and Muslim communities. Our recommendations to Meta stated below have been submitted and detailed by our comovement partner 7amleh and they are as follows: Meta should disclose all the keywords placed on its automation list, especially those related to difficult political contexts, such as the Palestinian context. Meta should immediately stop moderating the word martyr (Shaheed) through its automation policy, and take into account the different interpretations of the word and its political, social and religious context in some societies. Immediately disclose the list of Dangerous Individuals and Organizations (DIO), make it available for review, announce the criteria of designation, and create an appeal process for those who feel they have been wrongly included on the list. Adhere to BSR's recommendation, which was included in the human rights due diligence report, to fund public research into the optimal relationship between legally required counterterrorism obligations and the policies and practices of social media platforms. This would address questions such as how the concept of material support for terrorism should be interpreted in the context of social media, and whether governments should establish different regulations or interpretations for social media companies. Meta should commit to co-design with civil society organizations, academics and experts on the ground when working on its automation policy and any other related policies.

Link to Attachment

PAO 2023-01	PC-11200	United States & Canada
Case number	Public comment number	Region
Husam	Mahjoub	English
Commenter's first name	Commenter's last name	Commenter's preferred language
Sudan Bukra TV Channel		No
Organization		Response on behalf of

#### Summary Comment

A blanket ban on the word that is enforced automatically for the most part undoubtedly affects more uses to the word than praising an individual designated as dangerous. The connection between restricting praising individuals and preventing terrorist acts or radicalization of people is week. Examples of repentant jihadists or terrorists show that open debates and discussions are more effective as deradicalization tools. I support policy option 3 and suggest more reliance on well-trained human agents to check the context of incidents, and reports.

organization

#### Full Comment

Policy Advisory Opinion 2023-01 Husam Mahjoub Sudan Bukra TV Channel – Sudan ICT Advisory Group The word "shaheed" and its plural forms "shuhadaa" and "shaheedain" are mentioned more than 50 times in the holy Quran, most of them meaning witness or present. It is mentioned to mean martyr only a few times, but the concept has a rooting in the Prophet Mohammed's Sunna (traditions), referring to persons who die suddenly by a variety of causes, in addition to the widely known cause, dying while participating in jihad or in defense of one's wealth, self, or family. A blanket ban on the word that is enforced automatically for the most part undoubtedly affects more uses to the word than praising an individual designated as dangerous. The word is used extensively in literary works, religious (both Muslim and Christian) texts and works, news, scholarly works, historical and philosophical studies and debates, drama and theater, and personal writings. In some of these cases the word might be used to refer to an individual designated as dangerous and identifying that it was used to praise that individual will not be a straightforward thing. This judgement requires a broader consideration of the context including the personality or history of the person using it. The connection between restricting praising individuals and preventing terrorist acts or radicalization of people is week, if any. The many examples of repentant jihadists or terrorists show that open debates and discussions are more effective as deradicalization tools. There is a wide global acceptance of the freedom of expression as one of the most fundamental human rights which is necessary for the individuals and societies. Criminals and extremists in all forms and shapes had found ways to evade censorship and sanctions. The more restrictive Meta, and/or other social media platforms, policies against content that is deemed extremist or dangerous, the more it becomes attractive for certain people or groups to seek ways to access this content and to go underground. Observing the freedom of expression gives the chance to people with knowledge, expertise, and skills to shed light on the weaknesses and dangers of extremist and terrorist content, which is crucial and needed. I support policy option 3 and suggest that Meta relies on well-trained human agents to check the context of reported incidents of use of the word that are deemed to constitute praise, support, representation, or call for violence or recruitment. I also suggest that strikes should not be the first action, but rather an explanation of the rules violated, giving the user the chance to clarify his/her intentions or context. Providing the standard Meta feedback that accompany strikes, such as "violating community rules" don't help much, and especially for users whose culture is different than the majority of Meta users. These explanations add to the frustration from social media platforms and to feelings of discrimination and oppression, which, themselves, turn to give more support to extremist and terrorist discourse. Meta should also take extra care to organized reporting/protest against individuals/groups/pages which are caused by opponents of certain religions, nations, or cultures. It must not resort to block users who get reported as the first option, here again well-trained human agents are a necessity. P.S. Thank you for the opportunity to write this opinion, I was planning to write an extensive well-researched feedback, but unfortunately, the political situation in Sudan last week overwhelmed me and consumed all the time I was planning to dedicate to writing this piece, especially with the eruption of fighting in Sudan's capital and other cities on Saturday.

Link to Attachment <u>PC-11200</u>

PAO 2023-01	PC-11198	United States & Canada
Case number	Public comment number	Region
Christchurch Call Coordination Unit	NZ Government	English
Commenter's first name	Commenter's last name	Commenter's preferred language
New Zealand Government		Yes
Organization		Response on behalf of organization

Summary Comment

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• The term Shuhada (the plural of Shaheed) has been used extensively to refer to the victims of the March 15 Terror attack by New Zealand Ministers, Government Departments and Agencies, and other entities such as the Royal Commission of Inquiry established to examine the Government's response to the attacks on Christchurch Masjidan (the RCOI). The RCOI reported inter alia on the experiences of survivors, witnesses, and their families and concluded that Shuhada was the term families wished to see applied to the victims. • New Zealand has a legal framework whereby an independent entity – the Classifications Office – may designate a publication or pieces of online content as objectionable.

Full Comment

[This submission reflects input from the Department of Prime Minister and Cabinet's National Security Group and Royal Commission of Inquiry Implementation team, the Department of Internal Affairs, the Christchurch Call Coordination Unit, as well as the NZ Classifications Office.] • The term Shuhada (the plural of Shaheed) has been used

extensively to refer to the victims of the March 15 Terror attack by New Zealand Ministers, Government Departments and Agencies, and other entities such as the Royal Commission of Inquiry established to examine the Government's response to the attacks on Christchurch Masjidan (the RCOI). The RCOI reported inter alia on the experiences of survivors, witnesses, and their families and concluded that Shuhada was the term families wished to see applied to the victims. This is reflected throughout the report\*. • New Zealand has a legal framework whereby an independent entity – the Classifications Office – may designate a publication or pieces of online content as objectionable. A very high threshold applies to designating content as objectionable, which makes it illegal for users to possess or distribute that piece of content in New Zealand. The decisions are reviewable and subject to appeal, and exemptions exist for legitimate use of an objectionable publication. Such decisions would never be based on the usage of a single word, and would be heavily informed by context and intent, as well as the potential for harm. The Classifications Office actively seeks the views of communities on such matters. • For example, the Classifications Office in 2018 consulted with New Zealand Muslim communities regarding the term "nasheed". Other terms such as 'jihad' and 'shuhada' were also discussed. While the scope of the consultation was limited, they heard from the community that the co-opting of these terms by terror groups was 'un-Islamic'. It was suggested that the use of these terms in a terrorism or violent extremism context may be producing further harms to the Muslim community. • A diversity of community perspectives is essential to understanding context. Whilst some violent extremist or terrorist organisations may use the term to celebrate or encourage attacks, there are many other relevant usages including those referenced above. In some contexts it may refer to people who die as a result of illness or in accidents or natural disasters. The term Shaheed/Shuhada is used in various regions where Arabic has influenced the language, and may be used by individuals from various religious groups. \*illustrative examples provided below: (see christchurchattack.royalcommission.nz for full report) Acnowledgements: The Royal Commission wishes to acknowledge the 51 shuhada. They have been at the heart of our inquiry. We hope that the stories of the 51 shuhada are kept alive and that their stories inspire us and future generations. The Royal Commission also wishes to acknowledge the many survivors and witnesses. We hope the whanau of the 51 shuhada, and survivors and witnesses of the terrorist attack and their whanau live a peaceful life. Paragraph 2: "An important group of people we engaged with was the whānau (family) of the 51 shuhada, and the survivors and witnesses of the terrorist attack and their whānau." paragraph 35 "Those who watched the video included survivors of the terrorist attack as they lay in hospital, whānau of the shuhada, witnesses of the attack

and ordinary people in Christchurch and around the world – adults and children alike. paragraph 36 " New Zealanders reacted to the terrorist attack on 15 March 2019 with shock, disbelief, horror, sympathy and with an outpouring of public grief and solidarity with affected whānau, survivors and witnesses. News media covered the event and the aftermath comprehensively with extended interviews with affected whānau, survivors and witnesses. The media also interviewed ordinary citizens who wanted Muslim communities to know that New Zealanders rejected the terrorist attack and the apparent motivation. The remarkable acts of bravery by shuhada and survivors were highlighted, including the actions of the worshipper who ran at the individual during the terrorist attack and the worshipper who pursued the individual with an abandoned rifle.

Link to Attachment

PAO 2023-01	PC-11194	United States & Canada
Case number	Public comment number	Region
Yoni	Gorfinkel	English
Commenter's first name	Commenter's last name	Commenter's preferred language
Committee for		Yes
Accuracy in		
Middle East		
Reporting and		

Organization

Analysis

Response on behalf of organization

Summary Comment

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Understanding the appropriate use of "Shaheed" requires knowing the full meaning of the word. In all common dialects of Arabic, Shaheed suggests the tragic death of an individual; it also suggests the life the deceased led was positive, meriting special commemoration. Usually, using the word indicates the deceased died for a greater cause due to negligence or tyranny of an evil, powerful party. Compared to other groups of "Shuhadaa," the group whose "martyrdom" relates to the Arab-Israeli conflict regrettably includes a very large number of individuals ascribed the title Shaheed because they died murdering innocent Jewish civilians. META's current policy of monitoring usage of Shaheed so as not to glorify violence should continue.

Full Comment

April 14, 2023 Dear Oversight Board Members, We at CAMERA appreciate the opportunity to address policy regarding the use of Shaheed in Facebook posts. CAMERA's Arabic Department, which has deep expertise in the nuances of the language as well as awareness of the prevalence and nature of the occurrence of the term in social media, has provided insight regarding the questions raised. Critical to consideration of when the term "Shaheed" can be appropriately applied is to fully understand the meaning and implications of the word as generally used in all dialects: 1. The use of the word "Shaheed" (plural "Shuhadaa", infinitives "Istishad" and "Shahada") in all common dialects of Arabic (e.g. Algerian; Lebanese; Egyptian; Yemenite; Iraqi) suggests a tragic or premature death of the deceased individual; but it also suggests that the life that the deceased had led was generally a positive one, such that it is worthy of special commemoration (given the circumstances of their life, death or both.) 2. More often than not (i.e., except in the cases of some natural disasters, horrific accidents and severe diseases), using the word also suggests that the deceased had died for a greater cause due either to the negligence or tyranny of an evil, more powerful party (e.g. those responsible for the August 2020 explosion in the Beirut harbor, those responsible for the poor standards of construction in the buildings that collapsed in the February 2023 earthquake); or both. The sacrifice of the "Shuhadaa"'s lives is thus elevated to the level of "martyrdom," either because the authors would like their readers to be inspired by the noble cause in question, portray the deceased as victims of evil, or both. 3. How is the term used within the Arab-Israeli context (in all dialects, not just the Palestinian one)? Compared to other groups of "Shuhadaa," the group whose "martyrdom" revolves around the Arab-Israeli conflict includes an extraordinarily large number of individuals who have earned the title of a "Shaheed" because they died while being invested in the task of murdering innocent Jewish civilians (e.g. Dalal Mughrabi, Ra'd Hazem, Khairi 'Alqam, Hanadi Jaradat), or because one of their lives' highlights was murdering Jewish civilians (e.g. Sameer Quntar, Suleiman Khater, Yahya Ayyash, the three executed 1929 murderers). 4. Of the Dangerous Individuals (by Meta's definition) involved in the Arab-Israeli conflict who received the "Shaheed" title and did not meet one of the two criteria in article 3, the number of those who are not members of organizations which themselves target Jewish civilians as a matter of an openly declared practice, is evidently negligible. There is no evidence presented that proves over-enforcement concerning this particular group of "Shuhadaa". 5. Can a Jew ever be a "Shaheed"? Allegedly "impartial" news outlets and academics who attribute the "Shaheed" label to deceased individuals involved in the Arab-Israeli context matter-of-factly, (that is, not inside quotation marks or as a part of a debate on the word itself) differentiate between "martyrdoms" and simple "deaths" on

an ethno-religious basis. In other words, while Palestinians are "Shuhadaa" to them, Jews can only rise to the level of "dead," sometimes even in the same sentence with the same death circumstances. 6. A more severe case is also fairly common and that is when the Palestinians described as "Shuhadaa" are the murderers of the Jews who are merely "dead." Such differentiation is used by these news outlets and academics to put the murderers on a higher moral ground than their victims. 7. In the background of this particular habit are the antisemitic perceptions that no living and breathing Jew between the Jordan River and the Mediterranean Sea (regardless of age, sex etc.) can truly be a civilian, since they are all interlopers by definition; and that every living and breathing Jew between the River and the Sea is, individually, a part of an oppressive system so severe that targeting them as Jews is a moral imperative. The practice of calling Dangerous Individuals "Shuhadaa" indeed praises the acts that earned them this title, and evaluates their lives and deaths as more valuable than the lives and deaths of the Jewish Israelis they, or at least their organizations, had targeted. Such a practice normalizes antisemitic violence and encourages it. Of the three alternatives presented by the Oversight Board, leaving the current policy in place is the most rational and appropriate. Thank you for considering our comments regarding Meta's important decision in this matter. Sincerely, Yoni Gorfinkel Senior Analyst CAMERA Arabic Department

Link to Attachment

PC-11194

### PAO 2023-01

PC-11192

# United States & Canada

Case number

Public comment number

Region

English

David

Litman

Commenter's last name

Commenter's preferred language

Committee for Accuracy in Middle East Reporting and Analysis (CAMERA)

Commenter's first name

Yes

Response on behalf of organization

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Organization

Summary Comment

According to Oversight Board member Khaled Mansour, the current review of the term "shaheed" is connected to the report by Business for Social Responsibility, "Human Rights Due Diligence of Meta's Impacts in Israel and Palestine in May 2021," which suggested bias against Palestinians in Meta's moderation. However, BSR's report is riddled with factual inaccuracies, politicized narratives, and questionable conclusions. CAMERA's submission also addresses the unique way in which the term "shaheed" has contributed to waves of terrorism. Given all of this, CAMERA believes that Meta's current approach is the most appropriate in the circumstances.

Full Comment

The Committee for Accuracy in Middle East Research and Analysis (CAMERA) is the oldest and largest Middle East media-monitoring and research organization in the world. We promote accurate and balanced coverage of Israel and the Middle East. Given its expertise, CAMERA would like to make the following observations regarding the Oversight Board's review of Meta's approach to the term "shaheed." BSR's Factual Inaccuracies & Biased Narratives CAMERA is concerned about the report by Business for Social Responsibility (BSR) which, according to Oversight Board member Khaled Mansour, is connected to the current review of the term "shaheed." That report is riddled with inaccuracies and biased narratives. Basic factual errors color its narrative of the conflict, such as its false claim that Palestinian tenants were evicted in Sheikh Jarrah in April and the erroneous claim that "Israeli police enter[ed] Al-Aqsa Mosque during prayers" on May 7. While not directly relevant to Meta's policies, they raise questions as to the credibility of the report. Much worse is BSR's suggestion that Meta's role is to "mitigate the risk that its platforms...reinforc[e] power asymmetries" between a democratic nation and an internationally designated terrorist organization, Hamas, which BSR disturbingly refers to in the context simply as a "Palestinian political institution." Such language implies BSR views Meta as having a responsibility to use its ability to regulate online discourse to counteract an imbalance of military power between democratic nations, like Israel or the United States, and terror organizations, like Hamas or Islamic State. We certainly hope this view is not shared by Meta or the Oversight Board. BSR's Unsupported Conclusions These disconcerting errors and radical views raise larger concerns about the quality of the report's conclusions. This is particularly so given the other acknowledged shortcomings of the report, such as the difficulty in measuring under-enforcement and the inability to "account for potential differences in rates of violation..." On the latter, it is notable that BSR repeatedly suggests that there is a bias resulting from Meta's compliance with laws prohibiting the provision of material support to designated foreign terrorist organizations, lamenting that "[l]egal designations of terrorist organizations around the world have a disproportionate focus on individuals and organizations that have identified as Muslim." How BSR defines "disproportionate" in this context is unclear, but in any event, action to counteract any real or imagined bias in legal designations of terrorist organizations would raise concerns of its own. What would be considered the correct proportion and how would it be measured? Would the solution be to ignore Meta's legal obligations regarding designated terrorist organizations and sacrifice safety? Or would the answer involve creating additional, separate standards to capture greater amounts of content from non-Muslims? If the latter, how could this possibly be done in such a way as to not unfairly curtail the speech of individuals and violate the right to nondiscriminatory treatment? These questions directly tie into the question of how to treat the term "shaheed" which, as elaborated below, plays a key role in inciting Palestinian terrorism. The Nature of the Term "Shaheed" In addition to CAMERA Arabic's expert analysis on the term "shaheed," CAMERA wishes to direct the Oversight Board's attention to the unique way in which the term "shaheed" has contributed to Palestinian terrorism. As elaborated by Dr. Harel Chorev (full study available here), an expert on the Palestinians and professor at Tel Aviv University, social media has played a substantial role in fueling terror attacks by Palestinians by "offer[ing] alternative sources of legitimacy to the traditional sources of authority of the assailant, and has generated a contagious dynamic of attacks..." Dr. Chorev continued: "Prospective attackers derive legitimacy for their intentions from the feedback they receive through social media in the form of 'Likes,' talkbacks, and shares, often with the use of an innerlanguage of verbal and graphic codes. This includes symbols such as knives, guns, hearts, bleeding hands, illustrations depicting known attacks from the past, and references to previous attackers, along with patterned sentences such as 'we will live as proud hawks and die as erect trees'.... Some of the components of the inner-language are by no means original, but they are adjusted to the age of social media. For example, the commemoration of past attackers expresses the longstanding Islamic concept of the 'convoy of martyrs' (gafilat al-shuhada'), which sanctifies the value of striving for the martyrs' goal despite the difficulties. The prospective attacker's intention is not simply to honor the memory of prior attackers, but also to request the legitimacy conferred on them for him or herself. Likewise, the discourse conducted between the attackers and their social media community indicates that they do not see themselves as 'lone wolves,' but as representatives of communities that support their intentions. Since, in many cases, there has been a months-long discourse between the attacker in-the-making and 'his' community, it appears that the attacks themselves were not the result of a precipitous decision." One can find plenty of open source evidence of the role social media, including the use of the term "shaheed," has played in fueling particularly deadly waves of Palestinian terrorism (see, e.g., this report from the Middle East Media Research Institute). As has been well-documented by organizations like Palestinian Media Watch and the Meir Amit Intelligence and Terrorism Information Center, these dynamics are further fostered by Palestinian leadership, which hails terrorists as "shaheeds" and "heroes." For these reasons, CAMERA urges the maintenance of Meta's current approach to the term.

#### Link to Attachment

#### PC-11192

PAO 2023-01	PC-11191	

United States & Canada

Case number

Public comment number

Marwa

Fatafta

Commenter's first name

Commenter's last name

English

Region

Commenter's preferred language

Access Now

Organization

Yes

Response on behalf of organization

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Summary Comment

Access Now is concerned about Meta's current approach to moderating the Arabic term "shaheed" when used to refer to individuals it classifies as dangerous. We recommend that Meta creates a human rights based DOI policy that is transparent, precise, and enforceable and refrain from banning particular words or expressions which results in disproportionately censoring marginalized and historically oppressed groups. We urge the Board to issue a set of policy recommendations that protects freedom of expression, including the use of the word "shaheed", and that any removal should be based on international human rights law standards and not corporate definitions.

#### Full Comment

Access Now welcomes the opportunity to submit our contribution to the Oversight Board's review of Meta's approach to moderating the Arabic term "shaheed" when used to refer to individuals it classifies as dangerous (PAO 2023-01). Below, we outline our concerns regarding Meta's current treatment of the word "shaheed" as praise for terrorism under its Dangerous Individuals and Organizations (DOI) policy. We recommend that Meta must create a human rights based DOI policy that is transparent, precise, and enforceable and refrain from banning particular words or expressions which results in disproportionately censoring marginalized and historically oppressed groups. We urge the Board to issue a set of policy recommendations that protects freedom of expression, including the use of the word "shaheed", and any removal should be based on international human rights law standards including concrete criteria related to the intention, context, and scope of the content. I. Religious, political, and cultural context of the Arabic word "shaheed" Origins and meaning of "shaheed" The origins of the Arabic word "shaheed" stem from Islam. While different Islamic schools of jurisprudence have various definitions of what constitutes a "shaheed," it generally refers to Muslims who were either killed in war or who died in an accident such as drowning, dying while giving birth, or from plague. Over time, the use of the word "shaheed" has evolved to refer to individuals who have been killed in an armed conflict or as a result of state or state-sanctioned violence —including in contexts of mass uprisings, revolutions, armed conflict and military occupation- irrespective of the individual's acts or their religious or ideological background. As such, the word is a widely used political expression in the Arabic speaking world and in countries such as Syria, Tunisia, Egypt and Palestine. In the Palestinian context, in particular, the word shaheed is a fundamental part of the national social and political lexicon and used daily to describe those who have been killed by the Israeli military occupation. Meta's current definition and treatment of the word which is "based on the belief that "shaheed" in its various forms always constitute praise" is therefore context-ignorant and inherently inaccurate. Demonization of the word It is important to note that in the context of the war against terror, the word "shaheed" has become increasingly vilified by state actors and corporations. As noted by the Israeli scholar Yonatan Mendel, this word has been deliberately and systematically emptied of its contextual meaning and filled instead with demonized and negative values tied to glorifying death, violence and terrorism – which Meta's policy also suggests. A relevant example to mention in this context is the prosecution of Dareen Tatour, a Palestinian poet with Israeli citizenship, who was arrested by the Israeli authorities in October 2015 for publishing an Arabic poem on Facebook. According to the Palestinian organization Addameer, the interrogation and prosecution of Tatour in Israeli court was based on a false translation of her poem in which the word "shaheed" was translated to "terrorist" in Hebrew. We note this example here to emphasize the politically biased nature of such negative associations with the word, which Meta adopts and reinforces in its Dangerous Organizations and Individuals (DOI) policy, and as a result disproportionately targets marginalized and historically oppressed groups and restricts their ability to freely and safely expression themselves online. II. Concerns around arbitrary over-enforcement and erroneous over-removal of content We note with alarm the fact that the word

"shaheed" accounts for more content removals under the Community Standards than any other single word or phrase on Meta's platforms, and the largest single category of removals under Meta's DOI Policy. The human rights due diligence led by Business for Social Responsibility (BSR) of Meta's impacts in Israel and Palestine in May 2021, confirms that the over-enforcement of Meta's DOI policy was at the root of erroneous and arbitrary removal and censorship of Palestinian content, with Arabic content having greater over-enforcement on a per user basis. One reason could be that Arabic classifiers may have higher error rates for Palestinian Arabic. However, even when content is reviewed by human moderators, recent leaks revealed that third-party contracts have wrongly flagged Arabic content as terrorist contact 77% of the time. Given the high rate of erroneous removal of Arabic content under the DOI policy using both human review and automated decision-making tools, Meta is incapable of moderating the word "shaheed" with sufficient precision and nuance without infringing on users' rights to freedom of expression online. III. Freedom of expression and terrorism under International Human Rights Law Freedom of expression is an essential right for individuals, online and offline. As per Meta's human rights responsibilities, it's crucial to design and implement content moderation policies that are in line with international human rights standards related to freedom of expression. The UN Human Rights Committee emphasized in its General Comment No.34 that "All forms of opinion are protected, including opinions of a political, scientific, historic, moral or religious nature." It has also confirmed that the "right to freedom of expression embraces even expression that may be regarded as deeply offensive, although such expression may be restricted in accordance with the provisions of article 19, paragraph 3 and article 20." Therefore, any restrictions should respect the three part test... [For the rest of submission, please see the attached document]

Link to Attachment

<u>PC-11191</u>

PAO 2023-01

PC-11190

United States & Canada

Case number

Public comment number

Region

Emile

Ayoub

English

Commenter's first name

Commenter's last name

Commenter's preferred language

Brennan Center for Justice

Organization

Yes

Response on behalf of organization

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Summary Comment

We urge the Board to recommend that Meta undertake an overhaul of the DIO policy and end its efforts to police vague concepts like "praise" and "support," which have resulted in severe impacts for Muslim and Arabic-speaking users. Meta should consider prohibiting incitement to commit violent or terrorist acts, not praise or support of particular individuals or organizations. We also recommend that Meta take steps to evaluate and address the potential disparate impact of its rules. Additionally, we urge Meta to allocate sufficient resources for in-language review of Arabic and other diglossic languages and to provide more transparency surrounding the accuracy of its DIO policy decisions and the use of automated content moderation tools.

Full Comment

See attachment.

Link to Attachment

<u>PC-11190</u>

Public Comment Appendix | 22

PAO 2023-01	PC-11188	United States & Canada
Case number	Public comment number	Region
Noor	Waheed	English
Commenter's first name	Commenter's last name	Commenter's preferred language
Digital Rights		Yes
Foundation		
Organization		Response on behalf of

Organization

\_\_\_\_\_

Summary Comment

Given the multitude of ways "shaheed" can be translated, the third option presented by Meta to the OSB is most favorable as it does not attach a presumption that the use of the word "shaheed" is violative of DOI unless there are other reasons for removing the content. While the current policy assumes that the word "shaheed" used next to any DOI will always be to praise, the second policy option also attaches the same presumption, only with a few exceptions. Additionally, Meta should disclose its DOI list, employ more human reviewers to assess the use of the word contextually and only remove posts based on their potential for harm to best preserve online freedom of speech and reporting.

#### Full Comment

DRF welcomes Meta and the Oversight Board's initiative to take on an issue that disproportionately impacts the Middle East and South Asia. In the past, Meta has inadvertently and mistakenly silenced legitimate voices from the region such as in the case of Israel-Palestine, where pro-Palestinian posts were wrongfully flagged and removed. It is imperative for Meta to uphold international human rights standards for

organization

non-English language content without bias, including Middle-Eastern/South Asian language content. The word "shaheed" loosely translates to "martyr" but can often be used for someone who died an untimely death for a variety of reasons. It is often associated with dying for a "noble cause", such as for the protection of one's country but may also apply in cases where one dies in an accident. In Pakistan, the word is also attached to former Pakistani Prime Minister, Benazir Bhutto, who was assassinated during a public rally in 2008. In the Quran, the word "shaheed" has been used also to mean "witness". In the subcontinent, its meaning has evolved outside of religious context and is used as an honorific for the deceased, even used in conjunction with the deceased out of compassion for the bereaved. Given the multiplicity of ways in which the word "shaheed" is used in the common lingua franca of the subcontinent and across the Middle East means Meta's assumption the word is used in an exclusively complementary, praising or condoning manner, particularly when applied to DOIs, poses an impediment to freedom of expression as not all evocations of the word necessarily imply support for the DOI. In reality, it can be used by news reporters, journalists, witnesses, and average citizens following cultural norms, and sometimes even used by the family of DOIs who may not be condoning the actions of the DOI. At present, Meta has not made public their list of DOIs. This is harmful especially to news reporters, journalists and netizens who may, in the public interest or interest of news reporting and raising awareness, reproduce the use of the word in the "wrong" context when referring to DOIs. Meta needs to be transparent and make the list of organizations and individuals it considers dangerous public as a matter of company policy, a suggestion previously highlighted by the Board in the Nazi Quote case, Recommendation No. 3. Doing so would also allow public scrutiny of the list, ensuring more nuance to what constitutes a dangerous organization and individual given that the criteria may vary regionally. Meta should take cognizance of the fact that not every country considers the same organizations and individuals to be dangerous or even legally "proscribed" under their local or even international counter-terrorism laws. A banned organization or individual in one jurisdiction may not be deemed as such in another. Alternatively, not all dangerous organizations and individuals may be on the DOI list. For instance, Pakistani right-wing religiopolitical entities such as the TLP may not be formally on Meta's DOI list, but they routinely use inflammatory rhetoric, which on several occasions has mobilized the masses into hosting wide-scale violent public protests. The former leader of TLP, Khadim Rizvi, has been venerated as "shaheed" by his followers. Mumtaz Qadri, the man who assassinated the Governor of Punjab, Salman Taseer, for speaking out against the abuse of Pakistan's blasphemy law, was also hailed as a hero and called "shaheed" after he was executed in 2016. Even though it

is unlikely that Qadri would be on Meta's DOI list, the real-life consequences of praising Qadri's actions, which support baseless accusations of blasphemy and vigilante behavior, constitute some of Pakistan's greatest human rights challenges today. In DRF's view, the third option presented by Meta to the OSB is most favorable as it does not attach a presumption that the use of the word "shaheed" is violative of DOI unless there are other reasons for removing the content. While the current policy assumes that the word "shaheed" used next to any DOI will always be to praise, the second policy option also attaches the same presumption, only with a few exceptions. Often the word "shaheed" does not mean anything more than someone who became deceased before their time, and is used for the victims of terror attacks as well. There could be a scenario where a post mentions a DOI with a victim(s) along with the word "shaheed," which Meta's automated systems may accidentally flag as violating. Given this, Meta's evaluation of the use of the word "shaheed" in the context of DOIs should be completely contextual. Any post that has the word "shaheed" in tandem with any DOI should ideally be reviewed by human moderators who are familiar with the local context from which the post is originating. The decision on whether or not the post should be removed should only be contingent on its potential for harm. In any case, Meta should absolutely add "shaheed" to its policy exception for neutral news reporting. Finally, Meta's current sanction system is too severe, given the wide context of the word and discriminatory impact. In the event use of the word "shaheed" is found to be violative, the poster should be allowed to appeal a strike and provide an explanation for context (which can then be analyzed by a human reviewer). In any case, severe or one-strike sanctions should be reduced or changed to a more generous multiple-strike policy to ensure that the Arabic-Hindi-Urdu-Persian voices on Meta's platforms are not disproportionately and unfairly targeted.

Link to Attachment

<u>PC-11188</u>

PAO 2023-01

### PC-11187

Case number

Public comment number

Region

Canada

Selma

Dabbagh

Commenter's first name

Commenter's last name

### English

Commenter's preferred language

United States &

## International Centre of Justice for Palestinians

Organization

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Summary Comment

Please see attached letter.

Full Comment

Please see attached letter.

Link to Attachment

<u>PC-11187</u>

Yes

Response on behalf of organization

Public Comment Appendix | 26

### PAO 2023-01

PC-11179

# United States & Canada

Case number

Public comment number

Region

English

Prof. Mohammad Abualrob

### uallop

Commenter's first name

Commenter's last name

Commenter's preferred language

### **Birzeit University**

Organization

Yes

Response on behalf of organization

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Summary Comment

Dear Board members, Following up on the debate of the term "Shahed" or "martyr", using this term in News represents a common term in local communities and doesn't refer to violent agenda. According to academics and specialized, Martyr "Originally applied only to those who suffered for their religious beliefs, the term has come to be used in connection with people killed for a political cause". (N Falkenhayner, S Meurer and T Schlechtriemen)

Full Comment

As mentioned above, Martyr or "Shaheed" term uses in news outlets comes from a cultural perspective, thousands of newspapers, TV satellite channels, and radio stations in the Middle East use this term as a CULTURAL common concept and it's not rational to ask them all not to use this term on meta outlets while they traditionally and historical continue to use it. As an academic, the term itself doesn't determine the intended meaning, in fact, the context of the story or the whole narration is shaping the intended meaning or message. It's unfair that the meta-algorithm censors Palestine narration because of terms that the algorithm monitors and tracks. Another point of view that the Board should think about and determine, is why Facebook blocked and

punish the Palestinian media when it descript a Palestinian child, young man, woman, or an old man who was killed by the Israeli occupation forces be a martyr. why did Facebook delete this content considering it is against its policies regarding dangerous individuals and organizations? When the Israeli army invades a Palestinian city under occupation according to international law and kills Palestinian civilians in their city and district, this act should be named as representing dangerous individuals and organizations. The occupier act is a terror act, not the victim. Please review Facebook Polices and try to make it more balanced and fair Best regards, Mohammad

Link to Attachment

PAO 2023-01	PC-11177	United States & Canada
Case number	Public comment number	Region
Ilana	Sebba	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT PROVIDE		No
Organization		Response on behalf of organization

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Summary Comment

In regards to whether or not posts praising a terrorist as a "shaheed" should be removed

Full Comment

Please know, that in the context of posts praising someone who died after committing a terrorist act, there can never be an innocent use of the word "shaheed". In the context of a terrorist attack, the terrorist, who chooses to endanger his life by choosing to commit a terrorist attack in which innocent people are killed or wounded can never, ever, with anyone, qualify as a "martyr".

Link to Attachment

PAO 2023-01

PC-11176

# United States & Canada

Case number

Public comment number

Dan

Danziger

Commenter's first name

Commenter's last name

### English

Region

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Summary Comment

Terroristic threats is not protected free speech

Full Comment

Terroristic threats is not protected free speech

Link to Attachment

PAO 2023-01	PC-11172	United States & Canada
Case number	Public comment number	Region
Glenn	Caron	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT PROVIDE		No
Organization		Response on behalf of organization

Summary Comment

There is no peaceful definition of the Arabic word Shaheed. It is used to define one thing and one thing only, a person that kills another person. The restriction of that word on the Meta platforms will not completely stop these killings but it definitely helps. If Meta removes the restriction of this word it will be supporting the proponents of martyr killings and as such will have blood on it's hands.

#### Full Comment

There is no peaceful definition of the Arabic word Shaheed. It is used to define one thing and one thing only, a person that kills another person. The restriction of that word on the Meta platforms will not completely stop these killings but it definitely helps. If Meta removes the restriction of this word it will be supporting the proponents of martyr killings and as such will have blood on it's hands.

Link to Attachment

### PAO 2023-01

PC-11171

# United States & Canada

Case number

Public comment number

Region

Withheld

Withheld

Commenter's first name

Commenter's last name

### English

Commenter's preferred language

### Withheld

Organization

No

Response on behalf of organization

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Summary Comment

Racist posts

Full Comment

It is imperative that any posts that are racist and antisemitic (or even islamaphobic,) be removed from the platform. That is not and cannot be considered to be Free Speech. Comments of this nature are the breeding ground for more radical things to follow as such comments are inflammatory and cause more hatred of people to one another. As ac Jew yourself, you should know better and be more concerned than you claim to be.

Link to Attachment

PAO 2023-01	PC-11170	United States & Canada
Case number	Public comment number	Region
Allison	Livingstone	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT PROVIDE		No
Organization		Response on behalf of organization

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Summary Comment

I strongly believe Meta allowing the use of the word "Shaheed" promotes hate and violence and thus these platforms will be indirectly responsible for unrest, perpetual violence and unnecessary deaths in the world.

Full Comment

I do not think Meta should remove the algorithm that flags "Shaheed" in posts. There have been countless examples in print and video, of its use to describe praise for terrorist acts and I do not believe the priveledge for people who feel the need to use it in other contexts, should supersede the need to rid these online communities of the antisemitism, violence and hate that this word represents, and the individuals who utilize it.

Link to Attachment

# PAO 2023-01 PC-11169

United States & Canada

Case number

Public comment number

Region

English

Ron

Krell

Commenter's first name

Commenter's last name

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Summary Comment

The proposed removal of concerns to do with the term Shaheed (martyr) on your site would be a mistake leading to further Jew hatred.

Full Comment

Your values directly result in your success or failure . Breaking Commandments will break you. Breaking Commandments of those who break commandments is the ultimate betrayal.

Link to Attachment

### PAO 2023-01

PC-11168

# United States & Canada

Case number

Public comment number

Region

English

Withheld

Withheld

Commenter's first name Commenter's last name

# Commenter's preferred language

Withheld

No

Response on behalf of organization

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Organization

Summary Comment

No changes that allow for spreading of hate speech.

Full Comment

There should be no changes that allow for the facilitation of spread of hate. Spreading of hate is not free speech, but is only an incitement to violence.

Link to Attachment

PAO 2023-01	PC-11166	United States & Canada
Case number	Public comment number	Region
Withheld	Withheld	English
Withheld Commenter's first name	Withheld Commenter's last name	English Commenter's preferred language

Organization

Response on behalf of organization

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Summary Comment

The concept of shaheed is polysemic in the arabic language and in arabo-islamic cultures, Meta's content policy should contemplate this polysemy in order not to over regulate content that are not per se illicit.

Full Comment

The concept of shaheed is polysemic in the arabic language and in arabo-islamic cultures, Meta's content policy should contemplate this polysemy in order not to over regulate content that are not per se illicit. The word "shaheed" is an Arabic word often translated as "martyr" in English and in French. The term refers primarily to the notion of or "witness" which in the Islamic culture holds a central significance as the first pillar of Islamic rituals is to bear witness that "there is no God but Allah (swt) and that Muhammad (pbu) is His Messenger" : this testimony is often referred to as the "Shahada". It then follows that the core meaning of the word is someone who has witnessed the divine truth of Islam. Concretely, in some In Islamic cultures, the term is used to refer to someone who has died while defending their faith or serving their community. Shaheed is also used to refer to individuals who have died while fighting for a noble cause or while serving their country. The term is often used with great respect and honor in Muslim societies, and those who are considered shaheed are
regarded as heroes and celebrated for their sacrifice. Here are a few examples of how the term "shaheed" can have different connotations in different contexts: In the context of Islamic martyrdom, the term "shaheed" is used to refer to those who have died while defending their faith or in the cause of Allah. This is considered a highly honorable and respected status in Islamic culture. To be clear Martydom as the notion of Jihad (spiritual effort) is not necessarily linked to war context, for instance a very famous Prophetic sayings states "that the one who feel the urge to fornicate - while remaining chaste and content - and dies will be considered a martyr". In the context of Islamic Theology, As-Shaheed is one of 99 God's attributes. In some political contexts, the term "shaheed" can be used to refer to individuals who have died while fighting for a political cause, such as independence or democracy and have exerted political resistance. In this context, the term can carry a strong sense of patriotism and sacrifice. Especially, within the context of the Arab Spring : although it is islamically debatable—since suicide is reprobated-Mohamed Azzizi the young Tunisian man who sat himself on fire, died and fueled the Tunisian uprisings, is often described as "Shaheed". In the Moroccan context, following the fight for the decolonization of the country, the sultan Muhammad Ben Youssef (later King Mohamed V) who was exiled by the French for exercising political resistance was often described as the "Sultan As-shaheed". In the context of humanitarian actions or in the medical context, the term "shaheed" can be used to refer to individuals who have died in the service of their community, such as soldiers or police officers, doctors, nurses. This usage may be less closely tied to religious connotations and more focused on a sense of duty and service. For instance, the medical staff who died fighting the Covid-19 pandemic are often seen as "Shuhada" (plural of "Shaheed"). In some cases, the term "shaheed" may also be used in a more metaphorical sense, to refer to individuals who have made great sacrifices or suffered greatly in pursuit of a goal. For example, a person who has endured great hardship in the course of their life and died may be described as a "Shaheed" like people who have died from long, and incurable conditions (severe disabilities). Given this polysemic context, Meta's policy could use the context-dependent criteria to assess whether or not a content violates Meta's content policies. Therefore, the option to remove every content referring to the word "Shaheed" is not a viable option. Given the polysemy of the word and hence the additional signals that could be used by moderators to identify unlawful content it appears the best option is to remove content that uses "shaheed" to refer to an individual designated under our DOI policy only when there is additional PSR or signal of violence.

Link to Attachment No Attachment

### PAO 2023-01

PC-11165

# United States & Canada

Case number

Public comment number

Region

English

Roya

Pakzad

Commenter's first name

Commenter's last name

Commenter's preferred language

Taraaz

Organization

Yes

Response on behalf of organization

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Summary Comment

As an Iranian American representing Taraaz, I urge you to consider the cultural context of the word "Shaheed" in Iran. Its usage transcends political and religious ideologies, honoring martyrs and their sacrifices. Meta's over-enforcement could violate freedom of expression and access to information, negatively affect geo-tagging, and damage livelihoods. We suggest: - Adapt policy guidelines and enforcement plans to be language-dependent. - Train content moderators to understand nuances surrounding "Shaheed" and related terms. - Give the benefit of the doubt in geo-tagging contexts related to Iran.

#### Full Comment

I am writing on behalf of Taraaz, an organization based in the United States with a global focus. While we work on various global initiatives, 20% of our efforts are dedicated to Iran. I, Roya Pakzad, the submitter of this comment, am an Iranian American and a native Farsi speaker who spent the first 23 years of my life in Iran. I would like to provide feedback on the usage of the word "Shaheed" and other variations ("Shahid", شهد، شهدا، شهد، شهدا، شهادت ) and its implications for Meta's policies. Below are the main points of my comment: The word "Shaheed" in Iran is used to refer to a martyr and

holds a well-respected meaning that transcends political and religious ideologies. It is often used as an honorific prefix to acknowledge someone's sacrifice for their country, people, or faith. In the current Iranian context, the word has been significantly linked to individuals who sacrificed themselves during the Iran-Iraq war (1980-1988), resulting in the renaming of streets, public infrastructure, and businesses in honor of these martyrs. Meta's over-enforcement in flagging, taking down, or shadow banning users who use the term "Shaheed" may result in violations of freedom of expression and access to information. This is particularly important during political uprisings, such as the current one: Mahsa (Zhina) uprising. In addition, the over-enforcement may negatively impact geo-tagging features on Facebook and Instagram, potentially leading to the dissemination of false information. It may also damage livelihoods and businesses named after martyrs. In light of this context, I suggest that the Oversight Board recommend the following to Meta: - Make policy guidelines and enforcement plans language-dependent considering the context of the word "Shaheed" in Iranian Persian, Farsi Dari, Kurdish, Arabic, Turkish, other languages. This includes adapting technical approaches to content moderation, and ensuring that the model takes into account the language and other metadata such as possibly the location of the content. -Train content moderators to understand the distinctions and nuances surrounding the use of "Shaheed," "Shohada" (plural form of Shaheed), and "Shahadat" (becoming Shaheed and also witnessing) in various languages and contexts. - Give the benefit of the doubt in geo-tagging contexts, especially when the content is related to Iran.

Link to Attachment

#### <u>PC-11165</u>

PAO 2023-01	PC-11164	United States & Canada
Case number	Public comment number	Region
Marianne	Rahme	English
Marianne Commenter's first name	Rahme Commenter's last name	English Commenter's preferred language

SMEX

Organization

Yes

Response on behalf of organization

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Summary Comment

The word "Shaheed" accounts for the most content takedowns on Meta's platforms. Its multiple meanings do not allow for a clear moderation. This overmoderation strictly restricts speech for Arabic-speaking users on Instagram and Facebook. The impact of this over-moderation on the fight against terrorism is unclear and lacks transparency. It is worth noting that automated moderation without enough local moderators causes massive wrongful content takedowns. We urge Meta to commit to transparency when it comes to the DIO list, to its automation, to conduct effective HRIAs when introducing a new policy. Mostly, we ask Meta to commit to co-design with local actors.

#### Full Comment

Meta's current approach to "Shaheed" as praise of individuals or acts considered as terrorist strictly restricts speech for Arabic-speaking users on Instagram and Facebook, thus limiting their freedom of expression. The word "Shaheed" has various meanings in the Arabic-language, depending on the context of its use. For example, it is given as a first name and many people in the West Asia and North Africa region have "Shaheed" as their last name, it is also used in the name of non-governmental entities. One prominent example is Ahmed Shaheed, the UN Special Rapporteur on freedom of

religion or belief. "Al-Shaheed," in the Arabic language could refer to God, translating to the "All-and-Ever Witnessing" (in Islam). By banning the use of "Shaheed," Meta limits users from celebrating their religion. It is also restricting the mention of the "Al-Shaheed" monument, an artwork in Baghdad in commemoration of Iraqi martyrs. Most commonly, the word "Shaheed" is used to qualify "martyrs" who were killed during acts of resistance or while standing up to violence and/or armed conflicts, in defiance of military occupation, or victims of state violence. The broad interpretation of "Shaheed" restricts users from using it even in relation to deaths of people not directly involved in war or armed conflicts. For Arabic-speakers, anyone who dies under circumstances related to political unrest, such as war, armed conflict, a state of siege, military checkpoints, etc., is considered a "Shaheed," even if the victim was not involved in the latter in any way. A random bystander who dies during military operations, for example, is given the status of "Shaheed." A "Shaheed" could be a person who suffocated from exposure to tear gas, such as a baby or an elderly person, or someone who was not involved in any clashes but otherwise was victimized by military/state forces, i.e., not being able to get to the hospital to get treatment due to a military checkpoint. This already points out to the fact that the psychological meaning of the word is far removed from the reductive notion of inciting "violence." Many Arabicspeaking users cannot mourn the death of a loved one on Meta's platforms due to this restriction. In the Palestinian context, civilians killed by Israeli armed forces cannot be honored online, due to the ban of use of the word "Shaheed." By applying this policy, Meta is clearly siding with the oppressor, violating international law. "Shaheed" is also restricting and limiting journalist's ability to cover events resulting in lack of information and violation of rights to information [Article 19 of the International Covenant on Civil and Political Rights (ICCPR)]. Journalists resort to self-censorship to avoid content removal or "shadow banning." In sum, banning a word with several meanings and interpretations, results in heavy censorship, bias against Arab communities (Middle Eastern and South Asian organizations and individuals dominate Facebook's terrorist category constituting 70% of Tier 1). Combining the overrepresentation of Arabs and Muslims on the DIO list with the targeting of the term "Shaheed" creates a situation of double-overmoderation for Muslim and Arab communities. While this question may seek to answer the principle of proportionality, it may also disregard other principles that are interdependent. In order to be in accordance with these principles, the aforementioned restriction must also be imposed with transparency, clarity and accountability. The research on the connection between restricting praise of designated individuals (as in the DIO) and the effective prevention of terrorist acts is broader than just banning the word "Shaheed." It is necessary to

question the latter's effectiveness, as preventing terrorism requires more than just restricting words or hashtags. Limiting the battle against terrorism to specific terms with multiple interpretations only belittles this fight. Even if, hypothetically speaking, banning the term "Shaheed" on Meta aids in countering terrorism, we need clarity and transparency to gauge the efficiency of such an approach. Regulations aimed at preventing terrorism entail a clear definition of the term, which requires a comprehensive and precise DIO list. In the absence of such a list, it becomes evident that Meta's views on counterterrorism are very US-Centric (details below). Meta should engage in effective dialogue with NGOs/civil society organizations/academics to mutually agree on the interpretation of the notions of "praise," "substantive support," and "representation of terrorism" to avoid criminalizing individuals, groups, or entities wrongfully considered affiliated with terrorist organizations. Meta should also clearly draw the line between praise and journalistic coverage to avoid censorship and violations to the right to information/freedom of expression. By restricting freedom of expression in cases that are clearly not praising terrorism, but mourning the death of innocent people, Meta ends up siding with the perpetrators of violence, as exemplified in the Palestinian/Israeli context. The banning of the word "Shaheed," and the subsequent takedown of content in which it appears, in fact leads to concealing instances of violence, terrorism, and crimes against humanity, defeating the very logic of restricting the term in the first place. Taking into consideration the different definitions of the word "Shaheed," and that the term is not always representative of "martyrs," the question of whether the use of the word is appraisal for terrorism has no relevance. [We couldn't fit all 5 pages in here, please find the rest on our PDF document]

Link to Attachment

PC-11164

PAO 2023-01	PC-11163	United States & Canada
Case number	Public comment number	Region
Charles	Marot-Robinson	English
Commenter's first name	Commenter's last name	Commenter's preferred language
_		
European		Yes
Coordination of		
Committees and		
Associations for		
Palestine		
Organization		Response on behalf of

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Summary Comment

This comment condemns Meta's blanket ban on the Arabic Term 'Shaheed' by declaring it both discriminatory and dangerous, as within the context of Palestine, it suppresses Palestinian narratives and condone's Israel's repeated and systematic violence and violations of human rights and International law.

Full Comment

To Whom it may concern, As the European Coordination of Committees and Associations for Palestine, we oppose the Supervisory Board positions, as it has accepted Meta's request for a policy advisory opinion on its approach to the moderation of the Arabic term « Shaheed" -martyr- when referring to people it considers dangerous, including terrorists. First of all, this is absurd considering the term « Shaheed » has several meanings and translations, making a blanket ban on this word essentialist and ignorant. Shaheed can be a name, a designation for God, and can apply to victims of state violence or military incursions. The over-moderation of this term alongside the fact that there is an overrepresentation of Arabic people in Meta's Dangerous Individual & Organization List shows the overt censorship imposed on Arabic and Muslim communities. If we zero in on the Palestinian context, in light of the high civilian death toll during Israeli military operations, banning the word 'Shaheed' -used to honor their fallen ones- is both disrespectful and displays support for the Israeli occupation and its use of violence in Palestinian Territories. Taking down content that includes this term silences the Palestinian narrative, thus creating biased and incomplete media content, which is extremely dangerous. Indeed, removing Palestinian content that denounces the violence of this illegal occupation accounts to supporting Israel's repeated violations of International law. Therefore, as the ECCP, we ask that Meta discloses the keywords placed on the automation list especially when they are linked to complex political context, such as the Palestinian one. Meta should stop moderating the word martyr and acknowledge the different interpretations of this term. Moreover, in light of the importance of transparency, Meta should disclose its list of Dangerous Individuals and organizations and allow for it to be reviewed and appealed in order to create a more 'just' list. Finally, Meta should adhere to BSR's recommendation, which was included in the human rights due diligence report, to fund public research into the optimal relationship between legally required counterterrorism obligations and the policies and practices of social media platforms. In order to form a more accurate and just automation policy, Meta should co design it with civil society organizations and other experts and academics on the ground. Thank you, Kind Regards, Aneta and Charles from the ECCP

Link to Attachment

PAO 2023-01	PC-11162	United States & Canada
Case number	Public comment number	Region
Withheld	Withheld	English
Commenter's first name	Commenter's last name	Commenter's preferred language

## Withheld

Organization

No

Response on behalf of organization

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#### Summary Comment

Shaheed is often used as word for people who died in the act of killing others for the name of god and believed that you'll be reward in heaven afterwards. As such, it's promoting suicide. A couple of unacceptable aspects of it: - If the individual died in your mission by a woman, he will not go to heaven. - A woman cannot be a shaheed and hence it's not a fitting word for a martyr. - if the individual didn't die and is imprisoned or crippled in the act, he become a disgrace to his family. People close to me died by the hand of men called themselves shahid so for no good reason.

#### Full Comment

Shaheed is often used as word for people who died in the act of killing others for the name of god and believed that you'll be reward in heaven afterwards. As such, it's promoting suicide. A couple of unacceptable aspects of it: - If the individual died in your mission by a woman, he will not go to heaven. - A woman cannot be a shaheed and hence it's not a fitting word for a martyr. - if the individual didn't die and is imprisoned or crippled in the act, he become a disgrace to his family. People close to me died by the hand of men called themselves shahid so for no good reason.

Link to Attachment No Attachment

PAO 2	2023-01

PC-11161

## United States & Canada

Case number

Public comment number

Region

Abdullah

Al-Masoudi

Commenter's first name Com

English

Commenter's last name

Commenter's preferred language

## Sidq Yemen

Organization

Yes

Response on behalf of organization

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Summary Comment

The word Shaheed is widely used in Muslim communities. Muslims identify the following people as Shaheed: 1. The one who passes away due to plague 2. The one who passes away due to drowning 3. The one who passes away in pleurisy 4. The one who passes away due to an abdominal disease 5. The one who passes away due to being burnt 6. The one who passes away due to being crushed under something (earthquake for example) 7. The woman who dies pregnant. 8. Civilian who is killed in war. 9. Fighter who is killed fighting. We suggest that Meta allows all of the above to use the word Shaheed except number 9 as it may be used to praise a terrorist.

Full Comment

DID NOT PROVIDE

Link to Attachment

PAO 2023-01

PC-11157

United States & Canada

Case number

Public comment number

Region

Haneen

Kinani

English

Commenter's first name

Commenter's last name

Commenter's preferred language

The Palestine Institute for Public Diplomacy Yes

Organization

Response on behalf of organization

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Summary Comment

The term "Shaheed" has been mistakenly interpreted in its narrow definition when applied to Meta's policies, rather than taking into account its various political, religious and cultural interpretations. As a result many Muslim and Arab communities around the world are experiencing (self) censorship and content removal that leads to stifling of freedom of expression. Concerning Palestinians, the lack of understanding of the term reveals the extent of censorship and double moderation of Palestinian content. It also heavily undermines the narrative of the oppressed, promotes the narrative of the Israeli forces carrying the crimes against Palestinians, and creates a chilling effect for anyone engaging online around Palestine.

Full Comment

PIPD's Public Comment General: The term "shaheed" has various meanings and translations. Imposing a complete ban on its use is reflective of the narrow-minded view of the Arabic language and culture, indicating a lack of understanding of its usage and interpretations in the Arab and Islamic worlds. "Shaheed" (martyr) is a name that can be given to various individuals, and Meta's current policy may restrict Muslims from expressing their faith. The term is typically used to describe victims of state violence, civil wars, or self-defence acts against military occupation. Many cases where individuals are referred to as "shaheed" are not necessarily related to war or armed conflict. For instance, bystanders and civilians caught up in an armed conflict or killed during military operations may be given the status of "shaheed". This includes any individuals such as children or elderly people who were not involved in any protesting activity. These facts and examples demonstrate that the fundamental meaning of the word is different from the misleading concept of "inciting violence", which is how it is being defined in this policy. Censorship and double moderation: Instances and references of "shaheed" in social media content which has been taken down from Meta's platform are most often linked to a violation of Meta's "Dangerous Individual & Organization policy (DOI)", which prohibits the endorsement and backing of individuals or organisations listed as dangerous by Meta. However, it is acknowledged that the DOI lists a disproportionate number of Arab and Muslim organisations/representatives with a strong political aspect and specific bias to choose who is and is not on that list. When this disparity is coupled with the targeting of the word "shaheed," it results in a situation of double and/or over moderation of content shared by Muslim and Arab communities around the world. This means that these communities face excessive scrutiny and censorship, even in cases where their usage of the term may have not been related to any violation of Meta's policies. The context of Palestine and Palestinians: In the context of Palestinians, many are killed by the Israeli occupation forces, who are exerting an illegal control and force onto a captive population, and most of the time, Israeli forces violence is in complete violation of all principles and rules of international human rights and humanitarian law. By prohibiting Palestinians from honouring their loved ones who were killed by forces of the military occupation imposed on them, Meta not only shows a lack of respect for Palestinians, but on the contrary ends up normalising and supporting the occupying military force and its narrative and misinformation. Content removal: Removal and censorship of such content affects the accuracy of news coverage and facts shared on social media and heavily undermines the voices and narrative of oppressed peoples. Meta's current content moderation policies reinforce the harmful narrative and misinformation of the occupying power, and result in self-censorship and a chilling effect among journalists and media outlets reporting on the situation in the occupied Palestinian territory. Therefore, they are also simultaneously denying journalists and media outlets their right to work and report freely. PIPD's recommendations: 1. Meta should cease using its automation policy to moderate and censor the word martyr

(shaheed) immediately, and consider taking into account the various interpretations of the term in its political, social, and religious contexts in various Muslim and Arab societies. 2. Meta should disclose all the keywords/terms listed on its automation list, particularly those that are linked to contentious political contexts, and in this case particularly the context of Paestine and Palestinians. 3. Meta should immediately reveal the Dangerous Individuals and Organizations (DIO) list, and make it accessible for review, declare the designation standards, and establish an appeals process for anyone who believes they have been mistakenly and falsely included on the list. 4. Meta should provide the safe space for collaboration with civil society organisations, academics and experts on the ground when creating its automation policy and other related policies. These spaces are important as such actors are regularly engaged with oppressed persons particularly from Muslim and Arab communities, and have themselves experienced the chilling effect of the content moderation on social media. 5. Meta should follow BSR's suggestion, which is included in the human rights due diligence report, to finance public research into the optimal relationship between legally required counterterrorism responsibilities and social media platforms' policies and practices. This would address concerns such as how the notion of material support for terrorism should be understood in the context of social media, and whether governments and decision makers should establish distinct rules or interpretations for social media firms.

Link to Attachment

<u>PC-11157</u>

PAO 2023-01	PC-11151	United States & Canada
Case number	Public comment number	Region
Ayman	Abdullah	nan
Commenter's first name	Commenter's last name	Commenter's preferred language
Independent News Team		Yes

Organization

Response on behalf of organization

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Summary Comment

أعتقد أن على شركة ميتا إز الة المحتوى في حال تم استخدام كلمة شهيد قبل اسم لشخض مصنف على قائمة الشخصيات المتقد أن الإر هابية الخطرة مع وجود استثناء

Full Comment

أعتقد أن على شركة ميتا إز الة المحتوى في حال تم استخدام كلمة شهيد قبل اسم لشخض مصنف على قائمة الشخصيات الإر هابية الخطرة و ذلك لأن هذه الكلمة تقترن دائما بتعظيم هذه الشخصيات ومحاولة التسويق لبطولاتها باستخدام وسائل التواصل الاجتماتي لكن ينبغي أن يعطى استثناء لوسائل الإعلام في حال أر ادت الحديث عن ظاهرة ما تتعلق باستخدام شخص أو مجموعة لمصطلح شهيد .مثلا :ماذا لو استخدمت جماعة سياسية ما لأول مرة مصطلح "الشهيد أسامة بن لادن "في هذه الحالة يجب أن يتم تداول الخبر ونشره أيضا على فيسبوك نظر التبعاته السياسية .لكن يجب في هذه الحالة أن تكون الصياغة محايدة بشكل واضح لضمان عدم استغلال الاستثناء من قبل أنصار الشخصيات المصنفة على قائمة الإر هاب

Link to Attachment

No Attachment

Public Comment Appendix | 50

PAO 2023-01

PC-11146

United States & Canada

Case number

Public comment number

Region

Nigel

Goodrich

Commenter's first name

Commenter's last name

English

Commenter's preferred language

IMPAC

Organization

Yes

Response on behalf of organization

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Summary Comment

The term 'shahid' refers to those who kill themselves - itself an act of violence - and often others for an extremist ideological cause. Such acts are too often lauded on 'social' media and an incitement to others. Freedom of speech has limits: Meta has a duty and responsibility to protect potential victims by maintaining its current policy.

Full Comment

See above.

Link to Attachment

No Attachment

Public Comment Appendix | 51

PAO 2023-01	PC-11126	United States & Canada
Case number	Public comment number	Region
Susan	Hirshorn	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT PROVIDE		No
Organization		Response on behalf of organization

Summary Comment

The most common use (and understanding) of the word "shaheed" today is the call to violence by radical Islamists who have, for years, committed countless acts of violence against innocent people in virtually every country in the world. The word is still used in this way to incite terrorism. It should be banned from social media since this is the medium terrorists typically use to incite attacks.

#### Full Comment

The most common use (and understanding) of the word "shaheed" today is the call to violence by radical Islamists who have, for years, committed countless acts of violence against innocent people in virtually every country in the world. The word is still used in this way to incite terrorism. It should be banned from social media since this is the medium terrorists typically use to incite attacks.

Link to Attachment

PAO 2023-01	PC-11125	United States & Canada
Case number	Public comment number	Region
Withheld Commenter's first name	Withheld Commenter's last name	<b>English</b> Commenter's preferred language

## Withheld

Organization

No

Response on behalf of organization

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Summary Comment

I understand that you have a proposed policy to remove a moderation tool that flagged posts containing an Arabic word that roughly translates as "martyr". To avoid enabling escalation of violence and deaths, please DO NOT PASS THIS PROPOSAL

Full Comment

I understand that you have a proposed policy to remove a moderation tool that flagged posts containing an Arabic word that roughly translates as "martyr". I understand that you are seeking public comment on the proposed changes to its policy. I do not believe that there is an acceptable use for the term, when it is used in reference to those who engage in criminal acts against Israel or its population. I believe that if you pass this proposal, you will enable escalation of violence and deaths. Please DO NOT PASS THIS PROPOSAL.

Link to Attachment

PAO 2023-01	PC-11116	United States & Canada
Case number	Public comment number	Region
Rima	Merriman	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT		No
PROVIDE		
Organization		Response on behalf of organization

Summary Comment

In trying to resolve Meta's censorship in this case (Shaheed PAO), it is focusing on the wrong word. "Shaheed" is not the issue here, nor is it cultural confusion that is driving Meta's practice and missteps. Rather, it is politics on which "stakeholders" cannot agree. What we are sorely in need of is an accurate and global definition of the term "terror."

Full Comment

I respectfully submit to the Board that, in trying to resolve Meta's censorship in this case, it is focusing on the wrong word. "Shaheed" is not the issue here, nor is it cultural confusion that is driving Meta's practice and missteps. Rather, it is politics on which "stakeholders" cannot agree. What we are sorely in need of, instead, is an accurate and global definition of the term "terror." In a paper titled "Terror," the late philosopher Tomis Kapitan wrote: "Terrorism is deliberate, politically-motivated violence, or the threat of such, directed against civilians. By contrast, Ted Honderich describes terrorism as small-scale violence, driven by a political aim, that violates national or international law and is prima facie morally wrong. He thereby counts a good deal of

resistance activity and guerilla warfare as terrorist, even when directed against military personnel, while excluding the large-scale military actions of governments." Let's focus on the word "terror" instead of "shaheed" and let's accept Tomis Kapitan's definition instead of Ted Honderich's. In approaching the issues outlined in the call, the first order of business, in my view, is to tackle the problem of the list. If Meta has "got a little list," of "dangerous individuals and groups," let's see it and let us find out what the political vision behind it is. The Oversight Board itself suggested the definition of praise, etc. to Meta in what the Board calls its "Nazi quote" case. In applying it, as I know from personal experience (see "My plea to Facebook's Oversight Board: Stop criminalizing Palestinian armed resistance https://medium.com/@rimanajjar/my-pleato-facebooks-oversight-board-stop-criminalizing-palestinian-armed-resistancee2b3d1e50765), Facebook has been zealously applying this policy to silence and stamp out Palestinian revolutionary speech. (Ironically, Facebook "temporarily restricted" me from joining and posting to groups I do not manage" as I was sharing the blog post I wrote about the Board's request for a policy advisory opinion on Meta's approach to moderating the Arabic word "shaheed".) Before proposing solutions, there ought to be clarity as to what is being censored here. In my view, the focus is on the wrong word and wrong "list."

Link to Attachment

PAO 2023-01	PC-11115	United States & Canada
Case number	Public comment number	Region
Fred	Rabiner	English
Commenter's first name	Commenter's last name	Commenter's preferred language
FRabiner		No
Consulting		
Organization		Response on behalf of organization

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Summary Comment

The word shaheed is commonly used as a description of a terrorist who has been brainwashed to kill others while blowing themselves up.

Full Comment

The loosening of language use to "soften" the use of language describing a vile practice cannot be allowed. True intent of the root of these words must remain as is.

Link to Attachment

PAO 2023-01

PC-11113

# United States & Canada

Case number

Public comment number

Region

RABBI GARY

ZWEIG

English

Commenter's first name

Commenter's last name

Commenter's preferred language

PAINTSTORE TORONTO

Yes

Response on behalf of organization

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Organization

Summary Comment

### PLEASE DO NOT REMOVE THE ARABIC CONTENT TO LIMIT HATE SPEECH..META HAS RESPONSIBILTY TO ALL OF US..THANK YOU RABBI GARY ZWEIG PAINTSTORE TORONTO

Full Comment

### PLEASE DO NOT REMOVE THE ARABIC CONTENT TO LIMIT HATE SPEECH..META HAS RESPONSIBILTY TO ALL OF US..THANK YOU RABBI GARY ZWEIG PAINTSTORE TORONTO

Link to Attachment

No Attachment

Public Comment Appendix | 57

PAO 2023-01

PC-11112

United States & Canada

Case number

Public comment number

Region

Rachel

Levy Sarfin

Commenter's first name Commenter's last name

English

Commenter's preferred language

Self-Employed

Organization

No

Response on behalf of organization

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Summary Comment

I am deeply concerned that Meta is considering removing a content moderation tool regarding the Arabic word "shaheed."

Full Comment

I am deeply concerned that Meta is considering removing a content moderation tool regarding the Arabic word "shaheed." There is not an acceptable use of this term when it is used in reference to those who engage in criminal acts against Israel or its population and argues its past applications to endorse terrorism make it unfit for the platform.

Link to Attachment

PAO 2023-01	PC-11111	United States & Canada
Case number	Public comment number	Region
ALAN	ROOTENBERG	English
Commenter's first name	Commenter's last name	Commenter's preferred language
Solvbl Solutions Inc.		No

Organization

Response on behalf of organization

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Summary Comment

The world doesn't need another platform to promote antisemitism

Full Comment

Please consider reevaluating your decision. The world doesn't need another platform to promote antisemitism

Link to Attachment

PAO 2023-01	PC-11108	United States & Canada
Case number	Public comment number	Region
Holli	Irvine	English
Commenter's first name	Commenter's last name	Commenter's preferred language

## B'na Brith

Yes

Organization

Response on behalf of organization

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Summary Comment

I am against hate speech being allowed on social media. I am in favour of responsibility being shown by those who still know that freedom without rules is anarchy.

Full Comment

I agree whole heartedly that the platform given by social media for individuals to express themselves freely is wonderful but I believe certain limitations are necessary. Banning hate speech, banning the use of the word "Martyr" when it is known to to be used by organizations referring to people who kill Jews and are considered heroes to be celebrated is craziness. it is well known and spoken of publicly that the 'martyr's family is given money by the terrorist organizations and taken care of for the rest of their lives. How can social media allow this example to be seen by mixed up youth and consider it all right? That condones it! Terrorism has become so commonplace that in some countries it is no longer shocking.Terrorism is sickening enough. It shouldn't have a platform for other people to see. It should be outlawed like hate speech. It's just like the threats and views of the perpetrators of the holocaust. Israel is the only democracy in the Middle East. It's the most successful, green country. It is surrounded by people who won't be happy til it's pushed into the ocean but will fight to the end if it has to. As in all

democratic countries, free speech and tolerance of all peoples is the way it works in Israel. There are Arab Israelis in their parliament. Giving space to discuss the 'MARTYRS WHO KILL ISRAELI'S makes Meta thinking of doing this sound a bit irrational. I only say that given that in this particular case, we all realize we are using the word "MARTYR" to refer to a terrorist who does such things as became a suicide bomber, or blew up a bus from a cafe, and got arrested etc. Thank you.

Link to Attachment

PAO 2023-01	PC-11105	United States & Canada
Case number	Public comment number	Region
Tom	Weinberger	English
Commenter's first name	Commenter's last name	Commenter's preferred language
none		No
Organization		Response on behalf of organization

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Summary Comment

Since the word "shaheed" can be used to depict many meanings, many of which have been promoted by those using the term to endorse terrorism and murder of innocents, it should continue to be blocked. Those wishing to use the concept associated with peaceful connotation of this term can easily use another word that provides the same meaning.

Full Comment

The argument that certain regions wish to use this term is problematic. Does Meta and the oversight Board constantly review posts in the Arabic language and discern the inflection and intent of posted commentary? Does Meta and the Oversight Board have definite and proven neutral individuals who can be trusted to give and appropriate interpretation of postings using this word? Does the Meta Oversight Board have members who have proven lack of neutrality towards minority groups? Will the Meta Oversight Board remove Board members who have proven that they are in fact not neutral but harbor prejudices of their own towards minority groups or have a distorted understanding and position on historical events?

Link to Attachment No Attachment

PAO 2023-01	PC-11102	United States & Canada
Case number	Public comment number	Region
Withheld	Withheld	English
withheid	wittilletu	Eligiisii
Commenter's first name	Commenter's last name	Commenter's preferred language

Organization

No

Response on behalf of organization

\_\_\_\_\_

Summary Comment

Facebook should not allow terrorists to mask their intentions. Your owner should be ashamed of yourself for allowing hate groups to mask themselves as martyrs. It's very convenient like human shields being used for terrorists to hide weapons in hospitals and schools,

Full Comment

As the owner of Facebook both of you have ethnic backgrounds and should understand what it is to face hatred because of your religion or skin colour. The use of Martyr in many Arabic societies equates to being a shield to attack innocent Americans and alleged Jewish people inside of Israel and beyond. These terror groups rely on the internet and Facebook to foment hatred and violence. Enough is enough. Do the right thing or your company will face financial consequences.

Link to Attachment

PAO 2023-01	PC-11099	United States & Canada
Case number	Public comment number	Region
Withheld	Withheld	English
Withheld Commenter's first name	Withheld Commenter's last name	English Commenter's preferred language

Organization

Response on behalf of organization

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Summary Comment

Since facebook appears to ignore me I would like to give you information on some issues

Full Comment

Facebook now is cutting short videos of more left leaning commentators. The videos run for a minute or so, and then end abruptly. This program is getting so bad that my friends are contemplating leaving the platform. Another issue is that men can harass a woman in comments, and facebook ALWAYS says that it isn't against their policies- yet if you say something negative about a "old white male" that will get you banned for a week. What is up with that? I get that you have problems all over the world with facebook but really this negative woman response is really a problem

Link to Attachment

### PAO 2023-01

PC-11095

# United States & Canada

Case number

Public comment number

Region

Ian

Noy

Commenter's last name

## English

Commenter's preferred language

8254189563

Commenter's first name

Organization

No

Response on behalf of organization

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Summary Comment

The English and Arabic term meaning "shaheed" should be prohibited

Full Comment

The use of "shaheed" serves only to encourage martyrdom leading to violence and hatred towards Jews, Israel and other groups. It has no other function but to encourage copycat behavior that has ended in the death of a terrorist as in suicide bomber or murderer. It should not be allowed on social media

Link to Attachment

PAO	2023-01

PC-11094

# United States & Canada

Case number

Public comment number

Region

Barry

Bokhaut

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

Organization

Commenter's first name

No

Response on behalf of organization

\_\_\_\_\_

Summary Comment

Stop the promotion of terrorism on your site

Full Comment

I am deeply concerned that Meta is considering content moderation that would allow Arabic words that encourage violence and terrorism on Facebook.

Link to Attachment

No Attachment

Public Comment Appendix | 66

PAO 2023-01	PC-11092	United States & Canada
Case number	Public comment number	Region
Withheld	Withheld	English
Commenter's first name	Commenter's last name	Commenter's preferred language

## Withheld

Organization

Response on behalf of organization

No

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Summary Comment

The word "martyr" in any form should not be allowed on this platform as it incotes violence towards groups of people and certain countries. Nay expressions of violence and hate should not be permitted on this social platform.

Full Comment

The word "martyr" in any form should not be allowed on this platform as it incotes violence towards groups of people and certain countries. Nay expressions of violence and hate should not be permitted on this social platform.

Link to Attachment

PAO 2023-01	PC-11091	United States & Canada
Case number	Public comment number	Region
Simeon	Olsberg	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT PROVIDE		No
Organization		Response on behalf of organization

Summary Comment

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The use of the Arabic word Shaheed, or martyr in English is used exclusively to incite violence against Jews.

Full Comment

Continuing the ban on the use of the Arabic word Shaheed, or martyr in English, will save Jewish lives. Shaheed is used in the incitement to murder Jews - almost exclusively and removing the ban on the word will get Jewish people killed. Period.

Link to Attachment

PAO 2023-01	PC-11089	United States & Canada
Case number	Public comment number	Region
Withheld	Withheld	English
Withheld Commenter's first name	Withheld Commenter's last name	English Commenter's preferred language

Organization

Response on behalf of organization

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Summary Comment

Please DO NOT remove a moderation tool that flags posts containing an Arabic word that roughly translates as "martyr", as these posts can encourage terrorist activities

Full Comment

I am deeply concerned that Meta, parent company of Facebook, is considering removing from its algorithm content moderation surrounding an Arabic-language word used to incite violence and terrorism. The proposed policy, under consideration by Meta's Oversight Board, an independent committee of advisors, will remove a moderation tool that flagged posts containing an Arabic word that roughly translates as "martyr". The algorithm previously moderated posts using the term to prevent users from promoting terrorism on the platform, including during the Israel-Gaza conflict of 2021. Reports have emerged that the policy change is being pushed by anti-Israel advocates claiming the term is used in legitimate political discourse and part of "free expression." Khaled Mansour, an Egyptian-academic known for his bias against Israel, is a member of Meta's Oversight Board. I reject the notion that there is an acceptable use for the term, when it is used in reference to those who engage in criminal acts against Israel or its population. Its past applications to endorse terrorism make it unfit for the platform. Meta's Oversight Board, which has binding powers over content moderation, is now seeking public comment on the proposed changes to its policy. The proposed change in policy stems from recommendations made to the Oversight Board by an independent third party following a review by the Oversight Board into a 2019 user complaint regarding a removed post. It is unclear how the suggested policy modification arose from the recommendations made by the third party, as the recommendations made no reference to the Arabic word for "martyr." Why this particular word was chosen remains a mystery.

Link to Attachment

PAO 2023-01	PC-11088	United States & Canada
Case number	Public comment number	Region
Charles	Shaban	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT PROVIDE		No
Organization		Response on behalf of organization

Summary Comment

It depends on the case connected with the word, if he/she died for a cause or their country then they are Shaheed in the good meaning in Arabic

Full Comment

To explain further, there should be a way to connect to the way he/she died or killed; if the reason because they were killing civilians as an example, for sure they are not Shaheed, since the work mainly as many believe that they will go to heaven, and killing people make them terrier not shaheed. So my suggestion - although I am sure hard- that if the system could not see a clear connection with the reason, manual interference will be needed. Thank you.

Link to Attachment

PAO 2023-01	PC-11086	United States & Canada
Case number	Public comment number	Region
Weld	Henshaw	English
Commenter's first name	Commenter's last name	Commenter's preferred language

## Jews and Muslims for Peace

Organization

Response on behalf of organization

No

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Summary Comment

Shaheed is Arabic for martyr. There is no reason to ban the use of the word.

Full Comment

Shaheed is Arabic for martyr. There is no reason to ban the use of the word.

Link to Attachment
PAO 2023-01	PC-11085	United States & Canada
Case number	Public comment number	Region
Roma	Blecher	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT		No
PROVIDE		
Organization		Response on behalf of organization

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Summary Comment

Shaheed - promotes violence

Full Comment

Use of the word "shaheed" has one goal and one goal only: to promote and condone hate and violence. Why would Meta give a platform to those who promote hatred and killing of innocent people? Don't condone terrorism in the guise of "free speech"

Link to Attachment

PAO 2023-0	)1
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PC-11084

# United States & Canada

Case number

Public comment number

Region

Withheld

Commenter's first name

Withheld

Commenter's last name

# English

Commenter's preferred language

## Withheld

No

Organization

Response on behalf of organization

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Summary Comment

Stop spreading Jew hatred through your algorithms on social media platforms.

Full Comment

Stop spreading Jew hatred on your social media platforms.

Link to Attachment

PAO 2023-01	PC-11083	United States & Canada
Case number	Public comment number	Region
Withheld	Withheld	English
Commenter's first name	Commenter's last name	Commenter's preferred language

### Withheld

Organization

No

Response on behalf of organization

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Summary Comment

Please reconsider removing the word martyr from your algorithm.

Full Comment

Please reconsider removing the word martyr from your algorithm. Free speech should not be confused with insinuations of martyrdom in the context of violent activities directed against a population. META (Facebook) has a responsibility to moderate activities on its platforms to avoid spreading hate and incitement to violence.

Link to Attachment

PC-11082

# United States & Canada

Case number

Public comment number

Region

English

Jeff

Pinsky

Commenter's first name

Commenter's last name

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

-----

Summary Comment

I think your reasoning is very weak & just causes more hatred in the world by allowing such a word to be allowed on line. If there is a way to create some peace in this world, you should not allow a work that represents hatred in the Arabic language. This is not about business, it's about not creating more hatred.

Full Comment

I think your reasoning is very weak & just causes more hatred in the world by allowing such a word to be allowed on line. If there is a way to create some peace in this world, you should not allow a work that represents hatred in the Arabic language. This is not about business, it's about not creating more hatred.

Link to Attachment

PAO 2023-01	PC-11081	United States & Canada
Case number	Public comment number	Region
Mike	Collins	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT		No
PROVIDE		
Organization		Response on behalf of organization

Summary Comment

I think your reasoning is very weak & just causes more hatred in the world by allowing such a word to be allowed on line. If there is a way to create some peace in this world, you should not allow a work that represents hatred in the Arabic language. This is not about business, it's about not creating more hatred.

Full Comment

I think your reasoning is very weak & just causes more hatred in the world by allowing such a word to be allowed on line. If there is a way to create some peace in this world, you should not allow a work that represents hatred in the Arabic language. This is not about business, it's about not creating more hatred.

Link to Attachment

PAO 2023-01	PC-11075	United States & Canada
Case number	Public comment number	Region
Withheld	Withheld	English
Commenter's first name	Commenter's last name	Commenter's preferred language

### Withheld

No

Organization

Response on behalf of organization

-----

Summary Comment

Shahid = terrorist, somebody willing to kill innocent people for his religion or out of hate

Full Comment

Shahid is a killer of innocent children, unarmed innocent people. Whatever other infrequent meanings the word Shahid may have the meaning majority of people know is somebody willing to kill or who already killed out of hate. Don't allow content with word Shahid to brain wash and inspire other people to commit acts of violence.

Link to Attachment

### PC-11073

# United States & Canada

Case number

Public comment number

Rachel

Higgins

Commenter's first name

Commenter's last name

# English

Region

Commenter's preferred language

## DID NOT PROVIDE

Organization

No

Response on behalf of organization

-----

Summary Comment

Be a mench and do the right thing. Say no to hatred say no to racism and say no to antisemitism

Full Comment

Not available

Link to Attachment

PAO 2023-01	PC-11072	United States & Canada
Case number	Public comment number	Region
Harold	Abrams	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT		No
PROVIDE		
Organization		Response on behalf of organization

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Summary Comment

Incitement has no legitimate place on social media and freedom of speech is not an excuse for it either. I would insist that Meta do its part in not permitting violent expression proven to cause harm.

Full Comment

Incitement has no legitimate place on social media and freedom of speech is not an excuse for it either. I would insist that Meta do its part in not permitting violent expression proven to cause harm.

Link to Attachment

PC-11070

# United States & Canada

Case number

Public comment number

Region

English

Brian

Ellis

Commenter's first name

Commenter's last name

Commenter's preferred language

DID NOT PROVIDE

Organization

Yes

Response on behalf of organization

-----

Summary Comment

My comment is simple. You have both the ability and the social responsibility to monitor and screen out all forms of hateful content. This includes but is not limited to anti semitic content, yet you seem to refuse to do so. Do better and stop it entirely

Full Comment

My comment is simple. You have both the ability and the social responsibility to monitor and screw. Our all forms of hateful content. This includes bud is not restricted to anti demotic content, yet you refuse to do so. Do better and stop it entirely

Link to Attachment

PC-11077

# United States & Canada

Case number

Public comment number

Region

Shahin

Nejad

Commenter's last name

## English

Commenter's preferred language

HealthCare Management Group

Commenter's first name

Organization

Yes

Response on behalf of organization

-----

Summary Comment

Moderating words that some may (mis)interpret as legitimate within the context of their ideologies and be used as a tool to justify the means. This includes the word "martyr."

Full Comment

As stated in above. Thanks for great work

Link to Attachment

No Attachment

Public Comment Appendix | 82

PAO 2023-0	)1
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PC-11068

United States & Canada

Case number

Public comment number

Region

Andria

Spindel

Commenter's first name

Commenter's last name

Commenter's preferred language

English

Canadian Antisemitism Education Foundation

Yes

Response on behalf of organization

Summary Comment

Organization

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CAEF understands that Meta is considering removing from its algorithm content moderation surrounding an Arabic-language word used to incite violence and terrorism.

Full Comment

Meta advisors are considering removal a moderation tool that flagged posts containing an Arabic word that roughly translates as "martyr". The algorithm previously moderated posts using the term to prevent users from promoting terrorism on the platform, including during the Israel-Gaza conflict of 2021. Reports have emerged that the policy change is being pushed by anti-Israel advocates claiming the term is used in legitimate political discourse and part of "free expression." Khaled Mansour, an Egyptian-academic known for his bias against Israel, is a member of Meta's Oversight Board. CAEF rejects the notion that there is an acceptable use for the term, when it is

Public Comment Appendix | 83

used in reference to those who engage in criminal acts against Israel or its population and its past applications endorse terrorism so that makes it unfit for the platform. Much more must be done as society increasingly normalizes Jew hatred, which today is manifested as anti-Israel propaganda and is endangering the lives of Jews, in Israel and globally.

Link to Attachment

PAO 2023-01	PC-11066	United States & Canada
Case number	Public comment number	Region
Martin	Nash	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT PROVIDE		No
Organization		Response on behalf of organization

Summary Comment

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Martyr is a term used to glorify killing of innocent unarmed people as well as soldiers when the murderer is killed in retaliation. In modern times, the sanctity of life for all human beings has to be honoured and integrated. Offensive war can never be holy, holy war is inherently an oxymoron.

Full Comment

The above is my full comment.

Link to Attachment

PAO 2023-01	PC-11064	United States & Canada
Case number	Public comment number	Region
Alan	Livingston	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT PROVIDE		No
Organization		Response on behalf of organization

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Summary Comment

I strongly object to Meta withdrawing the Arabic word 'shaheed' or martyr, from your list of unacceptable words.

Full Comment

That word shaheed or its translation into English , martyr, would be 'cleansing' this idea of its strong attachment to terrorism and the killing, and even the obscene celebration of the killing of innocent civilians. This is Murder. When called 'resistance' it is still murder.

Link to Attachment

PAO 2023-01	PC-11061	United States & Canada
Case number	Public comment number	Region
Neal	Brooks	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT PROVIDE		No
Organization		Response on behalf of organization

Summary Comment

Your decision to change the algorithm will result in even more anti semitism but I have a sneaky suspicion that you already knew that and that prompted the change...I hope not but like many I'm ready to drop FB anyway

Full Comment

Your decision to change the algorithm will result in even more anti semitism but I have a sneaky suspicion that you already knew that and that prompted the change...I hope not but like many I'm ready to drop FB anyway

Link to Attachment

PC-11059	United States & Canada
Public comment number	Region
Wilkins	English
Commenter's last name	Commenter's preferred language
	No
	Response on behalf of organization
	Public comment number Wilkins

Summary Comment

\_\_\_\_\_

Content moderation algorithm should continue to monitor use of the Arabic word "shaheed", roughly translated as "martyr". Among Islamists, it is very frequently used to incite to violence and terrorism. Terrorists killed while committing violent acts are not heroes, but criminals, who should be condemned for their actions, not eulogized

Full Comment

Content moderation algorithm should continue to monitor use of the Arabic word "shaheed", roughly translated as "martyr". Among Islamists, it is very frequently used to incite to violence and terrorism. Terrorists killed while committing violent acts are not heroes, but criminals, who should be condemned for their actions, not eulogized.

Link to Attachment

PAO 2023-01
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PC-11057

# United States & Canada

Case number

Public comment number

Region

Withheld

Withheld

Commenter's first name

Commenter's last name

## English

Commenter's preferred language

### Withheld

Organization

No

Response on behalf of organization

-----

Summary Comment

Thank you for considering to keep our world safer by increasing Technological safety and NOT ALLOWING words of Hate, terrorism, martyrs etc to flood our universe. If you do nothing to stop the spread of Martrydom, hate and death...then you are part of the problem! PLEASE DO THE RIGHT THING! CREATE A MORAL LEGACY FOR META!!

Full Comment

Same as above.

Link to Attachment

No Attachment

7

PAO 2023-01

PC-11056

United States & Canada

Public Comment Appendix | 89

Case number

Public comment number

Region

## Hyim

### Bessin

English

No

Commenter's first name

Commenter's last name

Commenter's preferred language

DID NOT PROVIDE

Organization

Response on behalf of organization

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Summary Comment

Keep the status quo in order maintain vigilance against support for terrorism.

Full Comment

I encourage Meta to retain its current method of detection and enforcement for the Arabic word 'shaheed' due to is common usage to praise and support terrorists. Especially during the context of conflicts or wars, vigilant prevention of usage of this word will go a long way towards preventing praise and support for terrorism on Meta's platform.

Link to Attachment

PAO 2023-01	PC-11055	United States & Canada
Case number	Public comment number	Region
Withheld	Withheld	English
Commenter's first name	Commenter's last name	Commenter's preferred language

### Withheld

No

Organization

Response on behalf of organization

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Summary Comment

Shahid is considered by Muslim a person that get killed during a terrorists attack

Full Comment

Meta should not accept any racist or terroristic words that treats words like shahid as a martyr and not as a terrorist that dies during an attack perpetrated with the intention of killing because of race of religion!

Link to Attachment

### PC-11053

Case number

Public comment number

Withheld

Withheld

Commenter's first name

Commenter's last name

# United States & Canada

Region

English

Commenter's preferred language

## Withheld

Organization

Yes

Response on behalf of organization

-----

Summary Comment

Excellent definition, I really learned a lot

Full Comment

Cohesive and well thought out

Link to Attachment

No Attachment

Public Comment Appendix | 92

PAO 2023-01	PC-11051	United States & Canada
Case number	Public comment number	Region
Karim	Al Atrash	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT		No
PROVIDE		
Organization		Response on behalf of organization

Summary Comment

The opinon of who is dangerous is dangerous. Allow for use of the word 'shaheed' lest it be about Known\* religious fanatics. Nonetheless, in the context of those whom the Arabs find not to be dangerous but instead freedom fighters (such as many Palestinians today and in the past) Let it be had. Otherwise, the only platform for freedom of speech amongst almost all Arabs in their homeland is then stripped away from them.

#### Full Comment

Allow for use of the word 'shaheed' lest they be Known\* religious fanatics. Nonetheless, in the context of those whom the Arabs find not to be dangerous but instead freedom fighters (such as many Palestinians today and in the past) Let it be used, even if the West's opinion is against it (and this is seldom Not the case). Allow it to be a platform diametrically opposed to the popular 'liberal' opinions of the West, it is natural that this be the case given that the region is in fact Not the West, and thus cannot hold the same \*exact opinions for an endless number of reasons. Otherwise, the only platform for freedom of speech amongst almost all Arabs in their homeland is then stripped away from them, and we are left with nothing. The Arabs themselves are not a great

supporter of the West either way, if you check opinion polls, the majority hold opinions against the whole of it, and that is simply the truth of the matter. Let it be used however we may want to use it, we cannot and should not be subject to Your opinions and Your designations, those are your opinions and indeed these are ours.

Link to Attachment

PAO 2023-01	PC-10990	United States & Canada
Case number	Public comment number	Region
Barbara	Sobel	English
Barbara Commenter's first name	Sobel Commenter's last name	English Commenter's preferred language

Organization

Response on behalf of organization

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Summary Comment

As a reporter, I have had my business account permanently banned for harassment & bullying quoting Donald Trump and other Republicans comments. There is no way to appeal. Once submitting my driver's license, there was an automatic ban. Why is it that Donald Trump is permitted back on the platform, but a reporter has a lifetime ban for reporting news?

Full Comment

Please feel to read any of the newspaper articles I wrote which quoted the racists and/or hateful comments spewed by the Republicans that you say meet community guidelines.

Link to Attachment

PAO 2023-01	PC-10988	United States & Canada
Case number	Public comment number	Region
Jafar	Bdran	nan
Commenter's first name	Commenter's last name	Commenter's preferred language

#### Wtan

Yes

Organization

Response on behalf of organization

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Summary Comment

كلمة شهيد كلمة ساميه في العالم الإسلامي وفي جميع الأديان السماوية ومن الغلط على شركه عالميه بها جميع الديانات ويستخدمها المليارات ان تؤذي او تقييد كلمة ساميه

Full Comment

الشهيد هو الشخص الذي ضحى بحياته من اجل حياة الناس لا اقصد ان العدو هو دوله بعينها او شخص بعينه ومثلما رأينا في كارثة مدينتنا التي نكبت بفعل الزلزال )اللاذقيه - جبله (أطلق لقب شهيد على الذين توفو في هذه الكارثه ومنهم من كان ينقذ المتضررين ارجو من المعنيين بدل تخفيض او تقييد هذه الكلمة زيادة وصولها لانها تعني معاني كثيره حتى في حياة الأطفال من الجيد ان نعد اجيالا تحترم الشهيد والشهداء الذين يضحون من اجل )بلدانهم - حياة اشخاص - ارضهم (اما اذا بقيت ميتا تقوم بتقييد الحسابات لهذه الكلمة فسيؤدي الى ضياع احترام اهمية هذا الشخص انا اقيم في مدينة جبلة التي تلقب ب)ام الشهداء (حيث ان جميع الديانات ان بها ما يزيد عم ١٠ الاف شاب وشابه لقو حدفهم بسبب حروب وكوارث حلت على سوريا ارجو اخذ اعتبار السماوية تقدس هذه الكلمه واستمرار او فرض قيود جديده يؤدي لتداعيات وخيمه لشركه عملاقه يجب ان تتبع مبدا الحياد العالمي وهؤالاء معرصون لان ينشرو منشور عن شهيد في اي لحف كم كبين الناس الذين يستخدمون منتجات شركة ميتا من وفرض وهؤالاء معرصون لان ينشرو منشور عن شهيد في اي لحظه كون ان الشرق الأوسط وشمال افريقيا من وفرض وحتى في الحرب الروسية الأوكرانية هناك شهداء اوكرانيون وروس ارو وضع اعتبار العالمي وحتى في ميدا ميا من وفرض وحتى في الحرب الروسية الأوكرانية هناك شهداء اوكرانيون وروس ارو وضع اعتبار الاذيه النفسيه التي قد تلحق بام شهيد او وحتى في الحرب الروسية الأوكرانية هناك شهداء اوكرانيون وروس ارو وضع اعتبار الاذيه النفسيه التي قد تلحق بام شهيد او وحتى في الحرب الروسية الأوكرانية مناك شهداء اوكرانيون وروس ارو وضع اعتبار الاذيه النفسيه التي قد تلحق بام شهيد او

Link to Attachment

PAO 2023-01	PC-10985	United States & Canada
Case number	Public comment number	Region
Linda	Cohen	English
Commenter's first name	Commenter's last name	Commenter's preferred language

# **Olive Branch Fair** Trade Inc.

Organization

Yes

Response on behalf of organization

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Summary Comment

The Arabic word "shahid" is overregulated by Meta/Facebook. Shahid has several meanings including "living according to the principles of Islam", which include (but are not limited to) seeing God as the doer, regarding the self with humility, caring for the poor, being merciful, observing time for prayer, and observing Ramadan. In the Korean Shahid has another meaning: "witness". It also is used to describe someone who has died for his or her faith. Or in other words, a martyr. There's a history of respect and reverence for martyrs in Christianity and Judaism, the other two Abrahamic faiths. Many non-Muslims seem to have an irrational fear of Islam, which leads to suppression of Islamic content.

#### Full Comment

The Arabic word "shahid" is overregulated by Meta/Facebook. Shahid has several meanings including "living according to the principles of Islam", which include (but are not limited to) seeing God as the doer, regarding the self with humility, caring for the poor, being merciful, observing time for prayer, and observing Ramadan. In the Korean Shahid has another meaning: "witness". It also is used to describe someone who has

died for his or her faith. Or in other words, a martyr. There's a history of respect and reverence for martyrs in Christianity and Judaism, the other two Abrahamic faiths. Many non-Muslims seem to have an irrational fear of Islam, which leads to suppression of Islamic content.

Link to Attachment

PC-10983

# United States & Canada

Case number

Public comment number

Region

Tom

Kolko

Commenter's first name

Commenter's last name

English

Commenter's preferred language

DID NOT PROVIDE

No

Organization

Response on behalf of organization

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Summary Comment

That is so wrong. The history will not be kind to those who abuse those power

Full Comment

This is so wrong. History will not be kind to those who abuse those power

Link to Attachment

PAO 2023-01	PC-10982	United States & Canada
Case number	Public comment number	Region
Withheld	Withheld	English
Withheld Commenter's first name	Withheld Commenter's last name	English Commenter's preferred language

Organization

Response on behalf of organization

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Summary Comment

Shaheed is not profane. There is no reason under the sun that it should be moderated on Facebook.

Full Comment

Shaheed is not profane. There is no reason under the sun that it should be moderated on Facebook. There is a suggestion that it is linked to violence. Any violent posts should be removed, but shaheed does not universally pair with links to violence. Its inclusion in a post should not be automatically linked to violence. Every person who died in the recent Syria and Turkey earthquakes could be considered a shaheed. You dishonor the memory of the honored fallen be equating their celebrations with terrorism.

Link to Attachment

PAO 2023-01	PC-11097	United States & Canada
Case number	Public comment number	Region
Dave	Stuhl	English
Commenter's first name	Commenter's last name	Commenter's preferred language
DID NOT		No
PROVIDE		

Organization

Response on behalf of organization

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Summary Comment

There is far too much anti Jewish and anti Israel IL incitement being taught in Palestinian Authority and Hamas schools. Yet the local population in concert with their Intellectual Left and the Radical Left ignores it. Meta must remove that content from its platform. Meta and other social media companies hide behind the fact that they are only aggregators when in fact they are editing and censoring content on their platforms and are thus media companies who are subject to the same libel and slander laws as traditional media companies.

#### Full Comment

There is far too much anti Jewish and anti Israel 🇮🇱 incitement being taught in Palestinian Authority and Hamas schools. Yet the local population in concert with their Intellectual Left and the Radical Left ignores it. Meta must remove that content from its platform. Meta and other social media companies hide behind the fact that they are only aggregators when in fact they are editing and censoring content on their platforms and are thus media companies who are subject to the same libel and slander laws as traditional media companies.

Link to Attachment No Attachment

PC-11193

# Middle East and North Africa

Case number

Public comment number

Region

Benjamin

Ryberg

Commenter's last name

English

Commenter's preferred language

The Lawfare Project

Commenter's first name

Organization

Yes

Response on behalf of organization

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Summary Comment

Meta should not change its approach with regard to moderating the term "shaheed" and its variants when used to refer to individuals classified as "dangerous," including terrorists. Given that Meta's approach to moderating "shaheed" is limited to this specific context, and that the term is commonly understood to connote praise, it is difficult to envision how the current approach could lead to over-enforcement against benign content. Rather, a change to Meta's current approach would effectively pave the way for violations of its Dangerous Individuals and Organizations policy.

#### Full Comment

Throughout the Arab world, the term "shaheed" (and its variants) is commonly known as a term of praise for individuals who have died while committing violent acts of religiously-motivated terrorism. A simple internet search of the term readily yields countless instances of its use by members of designated Foreign Terrorist Organizations and their supporters to glorify terrorist acts. Indeed, one would be hardpressed to identify an instance where the term "shaheed" is used in reference to "dangerous" individuals—including members of terrorist organizations—in any manner that is not laudatory. Given this well-established definition, and in compliance with Meta's Community Standards, removal of content that uses "shaheed" in reference to individuals designated under Meta's Dangerous Individuals and Organizations policy is wholly appropriate. A change in Meta's moderation of the term "shaheed," in this context, would be tantamount to nullifying the Dangerous Individuals and Organizations policy altogether.

Link to Attachment

PC-11189

# Middle East and North Africa

Case number

Public comment number

Region

Withheld

Withheld

Commenter's first name

Commenter's last name

## English

Commenter's preferred language

## Withheld

Organization

No

Response on behalf of organization

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Summary Comment

Help prevent violence

Full Comment

In today's world of violence and more violence it is everyone's responsibility to take serious action against terrorism and take every preventive action possible in your power. Being proactive against terrorism and violence is not only a responsibility but more importantly a duty to make our world a safe and peaceful place to live.

Link to Attachment

PC-11174

Middle East and North Africa

Case number

Public comment number

Region

Lina

Assi

English

Commenter's first name

Commenter's last name

Commenter's preferred language

### Palestine Legal

Organization

Yes

Response on behalf of organization

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Summary Comment

Palestine Legal encourages Meta to stop moderating the Arabic word for martyr, "Shaheed," through its automation policy and consider different interpretations of the word and its political, social, and religious context in some societies, as well as the impact of such moderation on Palestinians in particular. Meta's content moderation policies are further perpetuating the self-censorship and chilling effect among journalists, activists, as well as media outlets who cover events in the Occupied Palestinian Territories.

Full Comment

Please see attached file.

Link to Attachment

<u>PC-11174</u>

PC-11153

Middle East and North Africa

Case number

Public comment number

Region

Naomi

Friedman

English

Commenter's first name

Commenter's last name

Commenter's preferred language

# Stop Antisemitism Now

Organization

Yes

Response on behalf of organization

-----

Summary Comment

Anti-Israel groups and terrorist organizations often refer to deceased terrorists as "shaheed" when supporting Palestinian terrorism and encouraging violence. Please continue your current policy of monitoring for this word.

Full Comment

Anti-Israel groups and terrorist organizations often refer to deceased terrorists as "shaheed" when supporting Palestinian terrorism and encouraging violence. Please continue your current policy of monitoring for this word.

Link to Attachment

PAO 2023-01	PC-11150	Middle East and North Africa
Case number	Public comment number	Region
Richard	Wagman	English
Commenter's first name	Commenter's last name	Commenter's preferred language
French Jewish Peace Union		Yes
(UJFP) Organization		Response on behalf of organization

#### Summary Comment

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Please do not censor content on the sole criteria of the appearance of the word "shaheed". it is not antisemitic and does not endanger Jewish people. Neither does discussion on the social media concerning Palestine, Israel or expressions of support for the Palestinian people.

#### Full Comment

Paris, April 9, 2023 To: Meta Oversight Board Subject: Reconsideration of the term "shaheed" Dear Board Members, The French Jewish Peace Union (UJFP) would like to comment on your reconsideration of moderation induced by the use of the term "shaheed" (i.e. "martyr" or "witness" in Arabic). We believe that moderation of content on the sole basis of the use of this word is abusive. This term (which has crept into the English language, like many others) is often misinterpreted. It can take on different meanings according to the context but the use of this term is quite "kosher" if I may use the expression. It doesn't denote any kind or hate message or discrimination per se. And yet it is one of the principal justifications used by Meta to censor content dealing with Palestine/Israel. This is unjustified and counter-productive. Rational discussion on the Middle East can't be conducted by eliminating content arbitrarily. And expressions of solidarity with Palestine is not antisemitic. In the same vein unconditional support for Israeli policies - including its war crimes - does not assure security for Jewish people. This uncovers a broader question which is moderation based solely on the use of algorithms detecting key words. That's perhaps a first step given the astronomic quantity of messages sent on Instagram, Facebook and other social media. But there has to be a number of filters after that, notably human beings. If you currently don't have sufficient staff to provide that service, you should hire the number of employees necessary. Real hate messages are a problem that has to be dealt with. False alarms aren't only misleading, they are counter productive. Legitimate content should not be censored by algorithms alone. This kind of decision is an ethical question and cannot be confided to computer technology alone. Respectfully yours, Richard Wagman Honorary President, UJFP Paris, le 9 avril, 2023 À: Bureau de Surveillance Meta Objet: Reconsidération du terme "shahid" Chers membres du Bureau, L'Union Juive Française pour la Paix (UJFP) aimerait commenter votre reconsidération de la modération induit par l'utilisation du terme "shahid" (c'est à dire "martyr" ou "témoin" en arabe). Nous croyons que la modération de contenu sur l'unique base de l'utilisation de ce mot est abusive. Ce terme (qui a fait son entrée en langue française, comme beaucoup d'autres) est souvent mal interprété. Il peut recouvrir des sens différents selon le contexte mais l'utilisation de ce terme est « cacher » si je peux me permettre. Il ne dénote en soit aucun message haineux ou discriminatoire. Et pourtant, il est une des principales justifications utilisées par Meta pour censurer du contenu en rapport avec la Palestine/Israël. Ceci n'est pas justifié. Pire, il est contre-productif. Une discussion rationnelle sur le Proche-Orient ne peut pas être conduite par l'élimination arbitraire de contenu. Et des expressions de solidarité avec la Palestine ne sont en rien antisémites. Dans le même sens, un soutien inconditionnel pour les politiques israéliennes - y compris pour les crimes de guerre commis par ce pays – n'assure en rien la sécurité pour les Juifs. Cette affaire recouvre une question plus large: celle de la modération basée uniquement sur l'utilisation des algorithmes détectant des mots clés. C'est peutêtre une première étape nécessaire compte tenu de la quantité astronomique de messages envoyés sur Instagram, Facebook et sur d'autres média sociaux. Mais il faut un certain nombre de filtres après cette première étape, notamment des être humains. Si vous n'avez pas actuellement le personnel suffisant pour assurer un tel service vous devez embaucher le nombre d'employés nécessaire. De vrais messages de haine constituent un problème réel et il faut s'en occuper. De fausses alarmes ne sont pas seulement trompeuses, elles sont contreproductives. Du contenu légitime ne doit pas
être censuré et l'utilisation des algorithmes comme seul moyen de modérer est une erreur manifeste. Ce genre de décision relève d'une question éthique et ne peut pas être confiée uniquement à la technologie informatique. Respectueusement, Richard Wagman Président d'honneur, UJFP

Link to Attachment

<u>PC-11150</u>

PAO 2023-01

# Middle East and North Africa

Case number

Public comment number

Region

Hiba

Alhaji

English

Commenter's first name

Commenter's last name

Commenter's preferred language

EQUITY AND EMPOWERMENT

Organization

Yes

Response on behalf of organization

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Summary Comment

The word Shaheed in Syria is very controversial because the Syrian Government uses this characteristic to refer to the those of the Syrian Army who were killed in the conflict, where those are seen by the opposition and the human rights centers as criminals because they are committing war crimes by killing civilians. On the other hand, the moderate opposition uses the term to refer to the civilians who were killed in the shelling and the fighters while the radical groups uses it to refer to their fighters.

#### Full Comment

The use of martyr or shaheed is problematic because there is no clear and agreed upon definition of it, so I suggest that using other terms such as victims "Dahaia" is more appropriate as all are really victims of the war.

Link to Attachment

No Attachment

Public Comment Appendix | 110

PAO 2023-01	PC-11130	Middle East and North Africa
Case number	Public comment number	Region
Khaled	Mouammar	English
Commenter's first name	Commenter's last name	Commenter's preferred language
One Democratic State		Yes
Organization		Response on behalf of organization

Summary Comment

\_\_\_\_\_

The word "shaheed" has many meanings and is regularly used by 1.5 million Arabs and Muslims. I strongly support the 3rd recommendation made by Meta to its Oversight Board.

Full Comment

Remove content that uses "shaheed" to refer to an individual designated as dangerous under Meta's Dangerous Individuals and Organisations policy only where there is additional praise, representation or support, or where there is a signal of violence. Meta believes that this option would "better align with Meta's value of voice and principles of international law" but "could be perceived as promoting voice over the value of safety." This option "maximizes the way Shaheed could be used," allowing people to "use the word according to their respective culture or vernacular." However, it could lead to content on its platforms that intends to legitimize terrorism. Meta says this option would be easier to operate than option two.

Link to Attachment

PAO 2023-01

# Middle East and North Africa

Case number

Public comment number

Region

tom

kohn

Commenter's first name

Commenter's last name

## English

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Summary Comment

very disappointing how untrue the world and media are

Full Comment

how disappointing so much untruth

Link to Attachment

PAO 2023-01	PC-11123	Middle East and North Africa
Case number	Public comment number	Region
Tal-Or	Cohen Montemayor	English
Commenter's first name	Commenter's last name	Commenter's preferred language

CyberWell Ltd.

Organization

Yes

Response on behalf of organization

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Summary Comment

CyberWell identified and vetted 300 pieces of content on Facebook that our technology flagged as highly likely to be antisemitic. We determined that, not only is content containing the word shaheed + PSR of DOIs available on the platform despite violating Meta's current policy, but also the current DOI policy does not go far enough. The praising of individuals who commit violent acts against Jews but who are NOT associated with a recognized FTO can also be found on Facebook. We recommend that Meta maintain its current DOI policy, dedicate additional resources to enforcement, and we also offer several recommendations for policy improvements to better identify and remove content using shaheed to praise violent terrorist activity.

#### Full Comment

Introduction As a nonprofit organization committed to eradicating online Jew-hatred through driving enforcement and improvement of community guidelines and safety policies, it is important for us to provide guidance on this subject, as the term shaheed is used on social media to glorify violence against Jews. By placing additional conditions for removal of posts containing the term shaheed when in violation of Meta's Dangerous Organizations and Individuals policy, we are concerned that violent and antisemitic hate speech will increase. Against the backdrop of the Supreme Court case in the US regarding upending Section 230 and roll out of the Digital Services Act in Europe, the policy changes proposed by Meta may further result in increased culpability and legal and financial repercussions. Shaheed Context The Arabic term shaheed literally means "witness". It is typically translated as "martyr" because often those who are called shaheed are individuals who are considered to have "testified" or "witnessed" their loyalty to Islam through their actions. Since the meaning of shaheed varies depending on the religious, cultural, and linguistic context and may also refer to additional actions, in this comment CyberWell refers to the term shaheed ONLY when used to glorify (PSR) the death of individuals who committed violent acts. Furthermore, many Muslim traditions describe the reward awaiting a shaheed, including ascending directly to Paradise, all sins being forgiven, a crown of glory being placed on their heads, etc. It is thus HIGHLY LIKELY that, when shaheed is used to refer to a terrorist who has died, it is being used as a PSR term to praise and glorify. CyberWell's Methodology Our methodology is as follows: use of keywords -> applying specialized dictionary based in the International Holocaust Remembrance Alliance (IHRA definition -> two rounds of human review. Our professional analysts are trained in the fields of antisemitism, linguistics, and digital policy. Taking into consideration the versatility of the term "shaheed", CyberWell focused on the antisemitic context of the term according to the first example in the IHRA definition-Violence: Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion- with the following specifications when reviewing existing posts on Facebook: •Publications in Arabic •Praising/encouraging violence or hatred against Jews •Dangerous organizations and Individuals - specifically entities that engage in serious offline harms against Jews in Israel and the West Bank To answer the question posed by Meta, CyberWell's antisemitism focused tech flagged over 400 publications containing the word shaheed as highly likely to include antisemitic material. We examined over 300 Facebook publications containing the term shaheed (with a focus on 2022-2023 and including a few outliers still live from as early as 2011) on its own and in different word combinations, such as: "الشهيد" [shaheed] "الشهيد" [AND -shaheed AND Izz al-Din al]"عز الدين القسام" / "حماس" AND "الشهيد" [shaheed AND hero] "البطل" "يهود" AND "الشهيد" [shaheed AND commander] ""القائد AND "الشهيد" [عبود" AND [shaheed AND Jews] Overview The sample of data presented in this document is divided into three types. Specific examples and links to posts still online are in a separate document: Appendix of Harmful Live Content Containing Shaheed. 1. The term shaheed + reference to a designated Dangerous Organization or Individual. In this report we

focused on the FTOs Hamas and Islamic Jihad and associated individuals. 2. The term shaheed + reference to terror organizations and individuals NOT designated as FTOs but which engage in serious offline harms ex: The Lion's Den. 3. The term shaheed + reference to Jews. Main Recommendations •Enforcement- According to Meta's current policy, posts using the word shaheed to refer to individuals recognized under the DOI policy should be removed. However, despite Meta's claim that posts containing shaheed + DOIs are removed at a high rate, posts with this condition can still be found online. As demonstrated in CyberWell's dataset of publications designated as "Type 1", this existing policy is enforced ONLY IN PART. CyberWell therefore concludes that it is NOT advisable to deviate from the current policy by placing additional conditions for removal on this content. •Expansion- Frequent turnover in actors and changes in power between organizations and rogue cells in areas of conflict create conditions in which individuals and organizations that engage in serious offline harm and violence are often not recognized as DOIs, leaving them outside of Meta's policy. Seeing the broad scope of publications using the word shaheed to praise terrorists and encourage violent attacks against Jews raises the importance of expanding Meta's policy and monitoring the usage of the word shaheed when referring to individuals who are not necessarily related to designated terror organizations. •Antisemitism- The term shaheed not only violates the DOI policy, but also is often associated with other forms of hate content. Out of 68 publications using the word combination "shaheed" AND "Jews" – 16 posts, or 24%, were flagged as antisemitic by CyberWell. Recommendations •Continue Meta's current approach and remove content that uses shaheed to refer to recognized DOIs •Dedicate additional resources to enforcing the existing DOI policy •Create additional policies for the identification and removal of posts praising offline acts of violence committed by those not already associated with recognized FTOs •Flag hashtags referring to specific terror attacks, for instance: "عملية\_القدس# •Flag posts with the combination of shaheed AND "hero", "الشهيد" AND • "السلطل" •Monitor additional forms of the common misspelling of - شهداء - plural - شهدا – common misspelling of the plural •Flag posts with the combination shaheed + Jews

Link to Attachment

#### PC-11123

PC-11119

# Middle East and North Africa

Case number

Public comment number

Region

Lori

Cava

English

Commenter's first name

Commenter's last name

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

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Summary Comment

Please stand up to hate and help end the circle of violence.

Full Comment

Members of Meta's Oversite Committee Dear Ladies and Gentlemen, I have one question to ask the board that I believe goes right to the heart of the problem. If any other race, creed, nationality, faith, or identity were being harassed, targeted, or threatened would their concern need to be debated by an oversite committee? Or would their concern and protection be taken care of before the need for an oversite committee? It is well documented that anti-Semitism attacks have tripled in the past few years. Although in our world's population, people of the Jewish faith represent only 2% of mankind. One must wonder where all the vitriol, violence, and extremism is being generated. Social media is the platform primarily abused to reach as many people as possible with devious if not diabolical intentions. Words like 'shaheed' may have different meanings, but the word is mostly used to praise terrorists that commit acts of unspeakable, horrific violence. So, again I ask, if any other race, creed, nationality, faith, or identity were the relentless fanatical targets of terrorists would there be a need to debate keeping this word as an identifier of dangerous individuals and their organizations? Imagine if someone you cared about was murdered, brutalized, or ripped apart simply for the blood in their veins. Picture your spouse and baby being slaughtered, right in front of you, simply because they exist. Popularity and fame should not be given to terrorists. They are not martyrs they are vicious murderers. Please, do not reward terrorism by allowing the monsters committing these barbaric deeds to be praised. The tables have turned in the world, especially in America. It seems as if the perpetrators have more rights than victims now. For example, in the past, this board has ruled in favor of the man that wants to celebrate nazis. The oversite committee determined this person has this right. What of the right of the 6+ million human beings obliterated and their remaining loved ones? I wonder if this decision stems from the fact that the victims are Jewish and there are so few Jewish people in the world, they are easiest to attack as they are the least likely to be protected. With hope, Lori A. Cava P.S. It is disturbing that an Oversite Committee has in the past overruled Meta's attempt to protect all peoples of the world with the same amount of diligence.

Link to Attachment

PC-11104

Middle East and North Africa

Case number

Public comment number

Region

angelo

sturino

Commenter's last name

English

Commenter's preferred language

B nai Birth Org.

Commenter's first name

Organization

Yes

Response on behalf of organization

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Summary Comment

to prevent the spread and the full intent of the spread of terrorism on any media outlet,.

Full Comment

Words can harm or hurt any one person, group of persons, especially faith based organizations. The social media is an outlet of our personal and social freedom of expression, which our Founding Father, 1790, the US Constitution However, we are living in an complex globe and societies, when a part of of these cultures, and societies oversteps the bounds of civility, ie terrorism and hate, this is the limit to assure to deter full intent of disclosure on the subjects of hate and terrorism. Let's deter to a full extent the disclosure of intent on the subjects of hate and terrorism. Many people have already suffered enough, lets stop it. thanks

Link to Attachment

PC-11101

# Middle East and North Africa

Case number

Public comment number

Region

Withheld

Withheld

Commenter's first name

Commenter's last name

# Commenter's preferred language

English

Withheld

No

Organization

Response on behalf of organization

-----

Summary Comment

The word shaheed incites and promotes violence and should be banned.

Full Comment

There is no acceptable use for the term, shaheed. In past applications it has been used to endorse terrorism and so it is unfit for the platform.

Link to Attachment

PC-11078

Middle East and North Africa

Case number

Public comment number

Region

Stephen

Labow

. . . .

English

Commenter's first name

Commenter's last name

Commenter's preferred language

Stephen M. Labow, Barrister & Solicitor No

Response on behalf of organization

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Organization

Summary Comment

This policy is ridiculous, anti-semitic and racist.

Full Comment

To allow this anti-semitic racist organization to post is contrary to public interest and should be blocked.

Link to Attachment

No Attachment

Public Comment Appendix | 120

PAO 2023-01

# Middle East and North Africa

Case number

Public comment number

Region

Martin

Glikman

English

Commenter's first name

Commenter's last name

Commenter's preferred language

DID NOT PROVIDE

Organization

No

Response on behalf of organization

-----

Summary Comment

Please do not update your policy and allow the incitement of anti semitism. I already receive enough of it online.

Full Comment

See above

Link to Attachment

No Attachment

Public Comment Appendix | 121

PAO 2023-01	PC-11182	Latin America & Caribbean
Case number	Public comment number	Region
Withheld	Withheld	English
Commenter's first name	Commenter's last name	Commenter's preferred language

### Withheld

Organization

No

Response on behalf of organization

-----

Summary Comment

Choice #1 - de-platform thise using the term as it is used to glorify Martyrdom and violence against the Indidels. Infidels are all non-Muslim people: Christiansm Jews, ,,, Islamists are the militants advocating Jihad, and use the internet to radicalize youth.

Full Comment

From the Quran: World Domination and Break Promises: [9.1] This is a declaration of complete absolution on the part of Allah and His Messenger from all obligations to the idolaters with whom you had made promises. Arabic term for permissible lying in Sharia, called taqiyya. [9.2] So go about in the land for four months, and know that you cannot frustrate the plan of Allah and Allah will humilliate the disbelievers. [9.3] And this is a proclamation from Allah and His Messenger to the people on the day of the Greater Pilgrimage, that Allah is clear of the idolaters, and so is His messenger. So if you repent, it will be better for you; but if you turn away, then know that you cannot frustrate the plan of Allah. And give tidings of a painful punishment to those who disbelieve. [9.4]Excepting these of the idolaters with whom you have entered into a treaty and who have not subsequently failed you in anything nor aided anyone against you. So fulfil to those the treaty you have made with them till their term. [9.5] And when

the forbidden months have passed, kill the idolaters wherever you find them and take them prisoners, and beleaguer them, and lie in wait for them at every place of ambush. But if they repent and observe Prayer and pay the Zakat (tax), then leave their way free. Surely Allah is Most Forgiving, Merciful. Jews must pay a head tax (the jizya). [9:29] Fight those from among the People of the Book...until they pay the tax with their own hand and acknowledge their subjection. [9:36] Fight the idolaters all together... [9:39] If you do not go forth to fight, He will punish you...

Link to Attachment

PAO 2023-01	PC-11148	Latin America & Caribbean
Case number	Public comment number	Region
Azaz	Elshami	English
Commenter's first name	Commenter's last name	Commenter's preferred language
Independent		No
Consultant		
Organization		Response on behalf of organization

Summary Comment

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I understand the rationale behind outlawing the use of Shaheed when referring to individuals designated as dangerous. Using such words could imply or lead to glorifying the harmful actions or ideology adopted by the individual referred to as Shaheed. However, context matter, and such removal should only be applied with a revision of said context.

Full Comment

Date: April 7, 2023 To: Oversight Board Reg.: The Oversight Board's call for public comment on Meta's request for a policy advisory opinion on its approach to moderating the Arabic word "shaheed" when referring to individuals it classifies as "dangerous," including terrorists. Dear Oversight Board Members Dear Members of the Oversight Board, My name is Azaz Elshami, and I am a member of META's trusted partners' community in the Middle East. I am an independent consultant focused on content policy related to Sudan and grassroots movements in the region. Opinions expressed in this letter are solely my own and do not express the views or opinions of my employer or entity with which I have a contract. I understand the rationale behind outlawing the

use of Shaheed when referring to individuals designated as dangerous. Using such words could imply or lead to glorifying the harmful actions or ideology adopted by the individual referred to as Shaheed. However, context matter, and such removal should only be applied with a revision of said context. I appreciate META's concern about balancing the value of voice and safety. While META's options 2 and 3 appear complex, they are the most suitable approach to deal with the term Shaheed and its implication. To mitigate the risk of jeopardizing the value of safety for the sake of the value of freedom of voice, I would suggest META invests more in expanding its understanding of the terms' usage in different contexts to be able to evaluate the impact of either removing or leaving the content. The discerption offered on the Oversight website in the relevant post [para 6] is inaccurate; Shaheed is not commonly used to describe dying unexpectedly or prematurely. Understanding the context is vital as the term use is not limited to the politically loaded meaning of Shaheed/Shahada. In the Islamic context, and this is a very general overview, two routes earn the deceased the Shahada: (1) the context in which a person was killed/died – e.g., any person who dies while on their way or journey for education, or the famous one, dying or killed while defending one's religion or honor - politicization of religion swapped honor for the homeland (nationalism) but this a topic for another time. (2) The cause of death, e.g., mothers who die in labor, and those who die by drowning, regardless of their religiosity, are also considered Shaheed. Also, Shaheed has another meaning: to witness, which has no connotation to the other more common usage of the word. Of equal importance, META must consider making the lists of dangerous groups public. It is common knowledge that Qaeda and ISIS are at the top of the list of the designated groups, which I assume are part of META's Tier 1 Dangerous Individuals and Organizations. But who else? It is imperative to make any list public because otherwise, the policy implementation will not make the platform safer as much as it will impact the users' freedom of expression. Users need to know who a candidate for Tier 2 would be and 3? for example, many armed groups engaged in armed struggle in Africa could easily pass as Tier 2; however, in the Sudanese context, for instance, these armed groups have recognized pages with their emblem and their leaders are on the platform enjoying vibrant interaction with their constituents. Do they only become dangerous when the term Shaheed or fitting Tier 2 should automatically revoke their access to the platform despite their usage of assigned terms/words? I hope you find my comments helpful, and thank you for the opportunity to share my thoughts. Sincerely, Azaz Elshami

Link to Attachment

#### PC-11148

PAO 2023-01

### Europe

Case number

Public comment number

Region

Mona

## Strasberg

Commenter's first name

Commenter's last name

English

Commenter's preferred language

No

Organization

**DID NOT** 

PROVIDE

Response on behalf of organization

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Summary Comment

There is enough hate and animosity in the world without your deciding what to filter. Any possible connection to antisemitism, racism, sexism should be removed without question.

Full Comment

See above for my thoughts.

Link to Attachment

#### PC-11183

## Europe

Case number

Public comment number

Region

Jillian

York

Commenter's last name

English

Commenter's preferred language

Electronic Frontier Foundation

Commenter's first name

Yes

Response on behalf of organization

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Organization

Summary Comment

EFF and ECNL have drafted a joint submission arguing that the use of automation to moderate an ambiguous word such as 'shaheed' has resulted in discriminatory practices against Arabic-speaking users. We advocate for a maximization of voice, an inclusion of civil society in policymaking, and a minimization of the use of automation in moderating this and other ambiguous terms.

Full Comment

Submission to Policy Advisory Opinion 2023-01 By Marlena Wisniak (European Center for Not-for-Profit Law) & Reema Moussa and Jillian C. York (Electronic Frontier Foundation) Introduction The automated removal of words such as 'shaheed' fail to meet the criteria for restricting users' right to freedom of expression. They not only lack necessity and proportionality and operate on shaky legal grounds (if at all), but they also fail to ensure access to remedy and violate Arabic-speaking users' right to nondiscrimination. Even within the Arabic-speaking world, the translation of the Arabic word "shaheed" into English (martyr) has created significant controversy. Many Arabic words, phrases, and ideas are not easily translated into English easily due to specific cultural references imbued within Arabic language and culture. This problem is not unique to Arabic—Farsi, Armenian, and other Mid-East based languages bear similar issues. Given that understanding the use and meaning of the term "shaheed" is largely context-dependent (similar to "jihad", another term over-moderated by Meta), automated content removal tools that lack the complexity to understand or interpret cross-cultural communication are ill-equipped to address the ultimate question that the Oversight Board is evaluating here: is the term "shaheed" being used by Meta's users to incite violence? Or is it used to protest human rights abuses occurring in the Israel-Palestine conflict and other regional disputes and abuses? Alternatively, is it being used to honor and remember Palestinians who have lost their lives—and is there a difference between using the word to honor those who lost their lives innocently or those who were committing an act of violence, or even terrorism? These are complex questions to consider, and an automated content moderation tool is simply not equipped to consider them. Even non-Arabic speakers may not be equipped to consider them given the cultural context that informs understanding "shaheed" and other Arabic words that don't translate directly into the English lexicon. The case of Sheikh Jarrah In May 2021, protests erupted when several Palestinian families were evicted from their homes in the East Jerusalem neighborhood of Sheikh Jarrah. Many Palestinians and allies took to social media to bring attention to this using the hashtag #SaveSheikhJarrah, in both English and Arabic. Users posting content with this hashtag in either language then reported that their posts were being deleted, accounts suspended (or threatened with suspension) by various social media platforms, including Facebook, Instagram, and Twitter. In response, AccessNow, as well as other civil society organizations such as EFF, 7amleh, and others called for Meta and Twitter to reinstate deleted accounts, "provide transparency on the decision-making processes involved in content takedowns related to Palestine," provide detailed information on "requests submitted by the Israeli Cyber Unit including numbers of complaints received, content removal, account suspensions and other content restrictions," among other things. The campaign was also supported by numerous Palestinian and other public figures. Neither Meta nor Twitter responded publicly to this call to action. Even prior to the Sheikh Jarrah protests, "dozens of Tunisian, Syrian and Palestinian activists and journalists" found their Facebook accounts deactivated in their reporting on human rights abuses in their respective regions. In a particularly egregious example of Meta's automated translation tools making mistakes leading to content moderation mishaps and even greater harms, in 2017, a Facebook post by a Palestinian man saying "good morning" was incorrectly translated into "attack them," reportedly leading to his arrest by Israeli police. Regulation of terrorist content online While binding laws and legislative proposals to

regulate terrorist content online have been proliferating, it's important to note that Meta's language rules are not based on legal requirements. As such, there's no legal requirement in banning particular words like 'shaheed.' Meta does so of its own volition, choosing to make an overly broad interpretation of the law. Meta and other platforms are rarely transparent about the legal basis of content removal, but it seems like they mostly develop their policies based on U.S. and E.U. law. EFF previously assessed that U.S.-based companies such as Meta, Twitter, and YouTube look to U.S. regulations to underpin their policies. As a result, the extremist groups that receive the most focus are typically those on the U.S. Department of State's list of Foreign Terrorist Organizations. Meta, for example, provides a list to moderators that includes photographs of leaders from groups on that list. But although companies use this list as guidance, they are not legally obligated under U.S. law to remove content that comes from these groups. In the U.S., "material support law" prohibits U.S. persons and entities from providing financial or in-kind assistance to groups on the State Department's list of foreign terrorist organizations. As noted by EFF, the U.S. government has not (at least publicly) taken the position that allowing a designated foreign terrorist organization to use a free and freely available online platform is tantamount to "providing material support" for such an organization, as is prohibited under the patchwork of U.S. anti-terrorism laws. Although the laws prohibit the offering of "services" to terrorist organizations, the U.S. Supreme Court has limited that to concerted "acts done for the benefit of or at the command of another." In February 2023, the Supreme Court heard oral arguments in two terrorism cases, Gonzalez v. Google and Twitter v. Taamneh. While outcomes of these cases certainly have the potential to severely harm freedom of expression and contribute to holding platforms liable for facilitating terrorist content online [...]

Link to Attachment

<u>PC-11183</u>

PAO 2023-01

## Europe

English

Case number

Public comment number

Region

Mel

Commenter's first name

Rose

Commenter's last name

Commenter's preferred language

No

Organization

**DID NOT** 

PROVIDE

Response on behalf of organization

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Summary Comment

This cannot be allowed. Clearly - and there is evidence as outlined - lives are ruined and lost as a direct result of online incitement.

Full Comment

This cannot be allowed. Clearly - and there is evidence as outlined - lives are ruined and lost as a direct result of online incitement.

Link to Attachment

Case number

### PC-11159

### Europe

Public comment number Region

Rodolfo

Commenter's first name

Marques

English

Commenter's last name

Commenter's preferred language

## paradadoorgulholgbt.com.br

Organization

No

Response on behalf of organization

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Summary Comment

I'm years of silence and blocked without notice. I working as activists I realize the arabica sufffers a lot but the problem it's a lot bigger then that. It's urge a fiscalization and response legal about it and the owner that just swing in money

Full Comment

I'm years of silence and blocked without notice. I working as activists human rights and posts without hearing the terms all the abuses and exploration of these mídias and so I'm suffering severe attacks and no monetizing could be done until now. It's arbitrary, no supporting and lie propaganda. You may now the hell was the election here the white supremacy, fake news and organization attacks were day by day with total compliance and monetizing of meta and us the minorities literally even could feel safe to go out the house. I have proofs and prints of this discriminations and no legal regulations about it. So unfair

Link to Attachment

#### PC-11159

PAO 2023-01

#### Europe

Case number

Public comment number

Region

## Withheld

Commenter's first name

## Withheld

Commenter's last name

# English

Commenter's preferred language

Withheld

Organization

No

Response on behalf of organization

#### Summary Comment

It is important to acknowledge that the term "shaheed" or "martyr" has been exploited by certain extremist groups who promote violence and terrorism in the name of their cause. Consequently, the term has become associated with negative connotations, which is not a fair representation of the majority of individuals who use it to refer to those who have given their lives for a noble cause. It is crucial to recognize that the concept of martyrdom exists in various cultures and religions, and it should not be exclusively linked to one particular community or belief system. It is imperative to approach any term or concept with an open and critical mind, without perpetuating harmful stereotypes or prejudices.

#### Full Comment

The term "shaheed" or "martyr" is widely used in Islamic culture and refers to someone who dies in the service of Allah or in the cause of Islam. The concept of martyrdom is not unique to Islam and exists in other religions and cultures as well. However, the term has been misused and abused by extremist groups, who glorify violence and terrorism in the name of Islam. This has led to the term being associated with negative connotations, and it is often used to describe individuals who have carried out violent acts or committed suicide bombings in the name of their faith. The glorification of terrorism is a significant issue, and it is not limited to Islam. There are extremist groups in other religions and cultures that also use violence and terrorism to further their cause. The misuse of the term "shaheed" or "martyr" by these groups has caused confusion and has created a negative perception of the concept of martyrdom in general. It is essential to differentiate between individuals who have sacrificed their lives for a noble cause and those who have carried out violent acts in the name of their faith. The concept of martyrdom is deeply rooted in Islamic culture and history, and it has played an important role in shaping the faith and beliefs of Muslims. However, the misuse of the term by extremist groups has created a perception that Islam is a violent religion that promotes terrorism. This is far from the truth, as the vast majority of Muslims reject violence and terrorism and believe in peaceful coexistence with people of all faiths. To address the issue of the glorification of terrorism, it is important to promote a greater understanding of the concept of martyrdom and its place in Islamic culture. It is also crucial to differentiate between legitimate acts of self-defense and violent acts that target innocent civilians. The international community must work together to combat extremism and promote peace and understanding among people of different faiths and cultures. In conclusion, the term "shaheed" or "martyr" has been misused and abused by extremist groups to promote violence and terrorism. However, it is important to recognize that the concept of martyrdom is not unique to Islam and exists in other cultures and religions as well. To combat extremism, it is important to promote a greater understanding of the concept of martyrdom and differentiate between legitimate acts of self-defense and violent acts that target innocent civilians. We must work together as a global community to promote peace and understanding among people of different faiths and cultures.

Link to Attachment

PAO 2023-01

#### Europe

Case number

Public comment number

Region

Aws

Al-Saadi

nan

Commenter's first name

Commenter's last name

Commenter's preferred language

Tech4Peace

Yes

Organization

Response on behalf of organization

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Summary Comment

كلمة شهيد متداولة كثير في اللغة العربية ويمكن استخدامها لأي شخص حتى ان يم يتطابق الوصف ما هو مذكور في الديانة الإسلامية، فوصف شهيد لمن توفى يحدد حسب معايير الديانة ولكن في الديانة الاسلامية فيتم استعمالها كثيراً وخاصة للذي توفى بمرض او دفاع عن ماله او عرضه او وطنه فيمكن تصنيف المنشورات الى صنفين مصنف يتم حذفه وصنف آخر لا يتم حذفه وسوف يتم شرح كل حالة مع الامثلة.

Full Comment

نستطيع ان نقول هنالك نو عين : النوع الأول وننصح بعدم حذف المنشور : حديث الرسول صلى الله عليه وسلم" : القتل في سبيل الله شهادةً، والطّاعونُ شهادةً، والغرَقُ شهادةً، والبطْنُ شهادةً، والحرَقُ شهادةً، والسُّلُ، والنَّفساءُ يجرُها ولدُها بسُرُر ها إلى الجنةِ "الْمَطْعُون : وهو الشخص الذي يموت بسبب مرض الطاعون . المبطون : وهو الذي يموت بسبب إصابة بمرض في . البطن مثل الإسهال أو انتفاخ المعدة . الغريق : وهو من يموت غرقًا في الماء . صاحب الهدم : وهو من يموت تحت الهدم والبناء . صماحب ذات الْجَنْب : وهو من يموت نتيجة إصابته بالقرحة والتي تكون في الْجَنْب بَاطِنًا . الْحَريق : وهو من يموت محر وقًا بالنار . متاجب ذات الْجَنْب : وهو من يموت نتيجة إصابته بالقرحة والتي تكون في الْجَنْب بَاطِنًا . الْحَريق : وهو من يموت محر وقًا بالنار . منافر أَة تئموت بجُمع : وهي التي تموت وهي حامل، أو في فترة النفاس الموت بالسل :من يموت بمرض السل يعتبر شهيدًا و ايضا ، مَنْ قُتِلَ دُونَ دِينِهِ أو دَمِهِ أو أَهْلِهِ فَهُوَ شَهِيدٌ : مَنْ قُتِلَ دُونَ مَالِهِ : وهو الذي مات دفاعًا عن سرقة ماله من قبل الأعداء و اللصوص . وين قُتِلَ دُونَ دِينِهِ أو دَمِهِ أو أَهْلِه فَهُوَ شَهِيدٌ : مَنْ قُتِلَ دُونَ مَالِهِ : وهو من يموت مرض السل يعتبر شهيدًا و الصوص . وين للله والدفاع عنه من أله عنه : من قبل دُونَ مَالِه : وهو الذي مات دفاعًا عن سرقة ماله من قبل الأعداء و اللصوص . فين تُتركرا أو قليلاً . مَنْ قُتِلَ دُونَ أَهْذِه : أي من مات وهو يدافع عن عرضه وشرفه . في بعض الاحيان هالك اسمهم سواء كان كثيرًا أو قليلاً . مَنْ قُتِلَ دُونَ أَهْدِه : أي من مات وهو يدافع عن عرضه وشرفه . في بعض الأحيان هناك اسمهم الشخصي هو )شهيد (مثل شهيد العتابي . وايضاً هناك ملاحظة حول الاشخاص الذين يتوفون بانفجار ار هابي و هم )الضحايا ( ايضاً يعتبرون شهداء ويمكن السماح بالمنشور ات المنشور ة . وايضاً الاشخاص الذين يتوفون بانفجار ار هابي و هم )الضحايا ( ايضاً يعتبرون شهداء ويمكن السماح بالمنشور ات المنشور ة . وايضاً الاشخاص الذين خرجو اللنظاهر ات من اجل حياة افضل البلا الموع النها يعتبرون شهداء ويمكن السماح بالمنشور ات المشور المو الشخاص الذين خر وا النفجار ار مابي و هم النصا الإس الوض المن والله الماب الماب الالموا النها وي الماب ويمكن السماح المائور الناحا الاخر فه الشخاص الذي

Public Comment Appendix | 134

المنشور لانه يعتبر تمجيد او مدح للاشخاص الار هابيين و هذا الشيء غير مناسب ان يكون متاح في مواقع التواصل الاجتماعي لانه يشجع على انتشار الار هاب .خاصة ان بعض الناس تعتبر هم قدوة لهم في حياتهم الشخصية او انضمامهم لمنظمات ار هابية «والتي تؤثر بالمستقبل على المجتمع واستقرار البلد .فالخيار الثالث هو الاقرب لنا 3- إز الة المحتوى الذي يستخدم »شهيد للإشارة إلى فرد تم تصنيفه على أنه خطير بموجب سياسة الأفر اد والمنظمات الخطرة في ميتا فقط عندما يكون هناك مدح أو تمثيل أو دعم إضافي، أو عندما تكون هناك إشارة إلى العنف .يعتقد ميتا أن هذا الخيار من شأنه أن »يتماشى بشكل أفضل مع قيمة ميتا للصوت ومبادئ القانون الدولي «ولكن »يمكن أن يُنظر إليه على أنه تعزيز الصوت على قيمة السلامة .«هذا الخيار »يزيد من الطريقة التي يمكن بها استخدام كلمة )شهيد(، مما يسمح للناس باستخدام الكلمة وفقًا لثقافتهم أو لغتهم العامية .ومع ذلك، يمكن أن يؤدي إلى محتوى على بر امجها يهدف إلى إضفاء الشر عية على الإر هاب .يقول ميتا إن هذا الخيار سيكون أسهل في التشغيل من الطريقة التي يمكن بها استخدام كلمة )شهيد (، مما يسمح للناس باستخدام الكلمة وفقًا لثقافتهم أو لغتهم العامية .ومع ذلك، يمكن أن يؤدي إلى محتوى على بر امجها يهدف إلى إضفاء الشر عية على الإر هاب .يقول ميتا إن هذا الخيار التيان يمكن أن يم ذلك.

Link to Attachment

PAO 2023-01

#### Europe

Case number

Public comment number

Region

#### Eran

Commenter's first name

Vasker

Commenter's last name

English

Commenter's preferred language

INOVIAI

Yes

Organization

Response on behalf of organization

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#### Summary Comment

We committed a brief analysis, over two periods of time using keyword filtering to collect 772 posts on Facebook and Instagram containing the word "shaheed" in Arabic. Based on our analysis, roughly 30% of the posts (215 in total) required careful examination for potentially violating Meta's policy. Of the 215 posts that required further evaluation, we found that about 16% (36 posts) would be in violation of Meta's third proposed policy option. Moreover, our research revealed that 31 of the 36 posts (86%) would be subject to removal due to violations found in images and videos rather than text. In light of these findings, we recommend that the Oversight Board advise Meta to select the third proposed policy option for implementation.

#### Full Comment

Executive Summary & Main Findings 1. In response to the Oversight Board's invitation for public comments regarding its forthcoming advisory opinion on Meta's approach to moderation of the Arabic word "shaheed" when used to refer to individuals it classifies as dangerous, including terrorists, we conducted a comparative quantitative study. Specifically, we analyzed the use of the word "shaheed" on Facebook and Instagram during two different time periods. 2. We reviewed and analyzed Meta's third proposed policy (henceforth "proposed policy" or "policy") that it presented to the Oversight Board to evaluate its effectiveness. The policy reads: "Remove content that uses 'shaheed' to refer to an individual designated as dangerous under Meta's Dangerous Individuals and Organizations policy only where there is additional praise, representation or support, or where there is a signal of violence." 3. For this analysis, we used an automated keyword filtering tool to collect 772 posts on Facebook and Instagram containing the word "shaheed" in Arabic. Based on our analysis, roughly 30% of the posts (215 in total) required careful examination for potentially violating Meta's policy because they contained problematic keywords associated with terrorism. 4. Of the 215 posts that required further evaluation, we found that about 16% (36 posts) would be in violation of Meta's proposed policy. While many of the posts do not contain explicit mention of individuals or entities found in Meta's Dangerous Individuals and Organizations list, they contain language that encourages violence or praises terrorists or terrorism. 5. Moreover, our research revealed that 31 of the 36 posts (86%) would be subject to removal according to the proposed policy due to violations found in images and videos rather than text. This suggests that there is a high prevalence of visual media in such posts. Therefore, it is crucial to explore ways to filter visual content in addition to text-based content filtering. 6. Finally, we found that approximately 50% of the posts containing "shaheed" that would be subject to removal under Meta's proposed policy also used the Arabic word for "Allah." 7. In light of these findings, we recommend that the Oversight Board advise Meta to select the third proposed policy option for implementation, as, based on our findings, it is effective method for identifying and removing terrorist content, whilst still maximizing the way "shaheed" can be used. 8. We have included the basis for a working methodology that Meta can adopt or incorporate to help identify content for removal in accordance with the proposed policy. Based on our findings, Instagram would be the optimal platform to focus these efforts on initially. This is because it appears to have higher rates than Facebook of content that would meet the threshold for removal under Meta's proposed policy. Quantitative Analysis For the collection and analysis of the data, we used multiple automated tools and human analysts. The complete methodology we used, which can easily be adopted or incorporated into Meta's existing methodologies, is found in Appendix A. As mentioned, 215 posts (30%) of the 772 initially identified that used the word "shaheed" required further evaluation because they also contained keywords associated with terrorism. 80 of these were on Instagram, and 135 were on Facebook. The charts below are visual breakdowns of the 215 posts, broken down by platform and year of publication. The 215 posts were then closely examined by analysts to determine whether they would be in violation of the proposed policy due to praising terrorists and/or signaling violence. 36 such posts were identified (16% of 215, and about 5% of the 772 total posts collected). Of the 36 posts that would violate the proposed policy,

more than 60% were on Instagram and about 40% on Facebook. Proportionally speaking, this means that Instagram may have 57% more posts on its platform that use the word "shaheed" and that violates Meta's proposed policy than Facebook. The table below provides a breakdown of the 36 posts that would be in violation of the proposed policy, divided by platform, date of publication, and the total number of posts (links to all 36 posts can be found in Appendix E). According to these findings, 30% of the 80 posts on Instagram that used "shaheed" and other keywords associated with terrorism would be subject to removal under the proposed policy, while 10% of the 135 posts on Facebook would be subject to removal. Type of Violation Facebook - Out of the 14 posts we identified that would violate Meta's proposed policy, 7 of them (50%) contained signals of violence. The other 50% expressed praise of terrorism or terrorists alongside the word "shaheed." Instagram – Out of the 22 posts we identified that would violate Meta's proposed policy, 19 of them (85%) expressed praise, often alongside the word "resistance." Additionally, 7 of the posts (31%) signaled violence Media Type Analysis Out of the 36 posts we identified that would be in violation of Meta's proposed policy, 31 of them (86%) had content that violated the policy in video or images found in the posts. Of the 31 posts, 23 of them (63%) would be in violation of that would be in violation of Meta's proposed policy due to attached images or videos containing praise for terrorists or terrorism. Likewise, 11 of the posts (30%) would be in violation of the proposed policy due to their attached videos or images signaling violence. Based on these findings, it appears that filtering posts by keywords alone to search for terrorist content is insufficient. Video and image-based content must also be filtered to effectively identify and subsequently enforce moderation policies. Moreover, our analysis found that of the 36 posts we identified that would violate Meta's proposed policy, 18 of them (50%, 9 posts on each platform) also contained the word "Allah" in Arabic.

Link to Attachment

PC-11121

PAO 2023-01

Commenter's first name

### PC-11114

## Europe

Case number

Public comment number

Region

Leslie

## Solomon

Commenter's last name

# English

Commenter's preferred language

No

Organization

**DID NOT** 

PROVIDE

Response on behalf of organization

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Summary Comment

Hate speech by any title is still have speech

Full Comment

Martyr is the standard title for those who died after committing a hate crime. It should be labelled as such.

Link to Attachment

DIO	0000 01
PAO	2023-01

Central & South Asia

Case number

Public comment number

Vladimir

Chorny

English

Region

Commenter's first name

Commenter's last name

Commenter's preferred language

Red en Defensa de los Derechos Digitales (R3D) Yes

Organization

Response on behalf of organization

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Summary Comment

R3D (Red en Defensa de los Derechos Digitales) is a non-governmental organization dedicated to defending and promoting human rights in the digital environment based in Mexico. One of our central lines of work is the defense of freedom of speech and the agenda of content moderation in social media. We address this analysis on a contextual basis and from an InterAmerican perspective, considering the legal framework established in the American Convention on Human Rights (ACHR) and in the work of both the InterAmerican Commission of Human Rights (IACHR) and the InterAmerican Court of Human Rights (IAHR Court). This framework is desirable for content moderation due to its solid standards for freedom of expression on the Internet.

#### Full Comment

The full text of our comment couldn't be loaded here but is attached to the form complying with the length and other requirements of the OB.

Link to Attachment
<u>PC-11185</u>

PC-11196

# Asia Pacific & Oceania

Case number

Public comment number

Region

English

Jeff

Allen

Commenter's last name

Commenter's preferred language

## Integrity Institute

Commenter's first name

Organization

Yes

Response on behalf of organization

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Summary Comment

Select Integrity Institute members prepared these comments and the Institute submitted them on their behalf. Meta's approach to "shaheed" as praise undermines freedom of expression by limiting critical discourse in conflict zones and beyond and fails to account for the term's positive meaning across regions, languages, and dialects. Undermining freedom of expression adversely impacts freedom of assembly, the right to political participation and non-discrimination, and can further distort the international community's understanding of complex social issues. Instead the 3 recommendations, we recommend removing the term "shaheed" as a content moderation signal entirely.

#### Full Comment

The current policy, as well as the 3 recommendations, all are likely to lead to overenforcement: From the technical side: Any automated systems will learn to overenforce, either based on the term "shaheed" or other non-unique names on the dangerous individuals list Content moderators are also likely to over-enforce systematically, especially if they cannot confidently identify any names in posts with individuals Over time, any lists of dangerous individuals would get polluted by benign content, as platforms err on the side of recall. When cultural specificity meets the dayto-day operations of content moderation: Any policy that still uses "shaheed" as a content moderation signal would lead to scenarios where content critical of dangerous individuals getting flagged There remain systemic issues around how we designate dangerous individuals and organizations, and this systematic bias is reflected in the application of "shaheed" Below, we provide additional details for each of Meta's 5 public comment requests that support our recommendation: Question 1 Meta's current approach to "shaheed" results in false positive removals of content from news providers, spiritual guidance, or individuals marking moments of cultural, personal or religious importance. This inhibits critical discourse and could be perceived as unfair bias. "Shaheed" is frequently used by marginalized Muslim groups to refer to members of their community who are murdered in acts of religious violence, including the Rohingya, refugees who have been forced out of Myanmar due to religious persecution. "Shaheed" is used for those who may pass away from nonviolent causes while in the act of performing a religious duty or tasks on behalf of a religious organization. "Shaheed" is commonly used in countries like Pakistan to refer to those who died in a secular line of duty, be they assassinated politicians, soldiers, or police officers. Question 2 Restricting praise of individuals associated with terrorist organizations on social media does not imply the prevention of terrorist acts. Research and empirical evidence suggest such solutions tend to negatively impact everyday users more than bad actors who adapt to bypass naive content-based filters through coded language; solutions like 'ethical scaling' provide better suggestions for content moderation. Minority populations often bear the brunt of sweeping policy changes. There are too few content moderators speaking underserved languages. For example, Meta had only one Burmese-speaking content moderator to monitor the posts by 1.2 million active Burmese users in 2014, and action was only taken against "2% of the hate speech on the platform" in 2019. Question 3 The term "shaheed" has a positive meaning across regions, languages, and dialects, with some regional differences. For example: In Turkey, "shaheed" could refer to sacred martyrdom. In Azerbaijan, "shaheed" in Azeri means a victim who was killed by criminal actions or someone who dies in a war. In India, "shaheed" means "martyr", but in a "good way". A "shaheed" has a high place in the hearts of Muslims globally. Further, some of the farmers who died during the 2020-2021 farmers protest were called "shaheed." In Pakistan, "shaheed" is a term that says someone had died, such as with the death of Benazir Bhutto. "Shaheed huay" is a common part of News Urdu idiom. In Egypt, "shaheed" can refer to anyone who dies unexpectedly due to external causes. For example, someone who dies in a fire could be considered "shaheed." In Tunisia, "shaheed" is regularly used in non-religious contexts. In the Tunisian revolution, a Tunisian man shouted مجد الشهداء (translation: glory to the martyrs). There were no religious connotations, as this was in reference to those killed by Ben Ali's forces. In Singapore, if you die during Ramadan, then you are considered as dying "shaheed," in a positive way. Question 4 We suggest numerous approaches to mitigate the collateral risks of this policy, starting with a foundational review. The word "shaheed" and its translations should be reviewed consistently across all languages. The negative impact of Meta's enforcement of this term could be somewhat mitigated if they are able to demonstrate uniform enforcement on similar terms in other languages and cultures. We agree with BSR's recommendations around "determining the market composition needed for rapid response capacities, the routing of potentially violating Arabic content to reviewers by dialect and region, improving classifiers, means to track hate speech based on type, and enhancing content moderation quality control processes to prevent large-scale errors." Meta should provide a robust and extensible reporting interface to allow contests of enforcement decisions related to this term including past reports. Meta can consider creating a consortium to address this issue similar to the Global Internet Forum to Counter Terrorism (GIFCT). Question 5 Transparency reporting and enabling researcher access to relevant data can improve accuracy and reduce bias of policy enforcement in this area. Meta should publicly report its content moderation activity consistently across languages in this space, including comprehensive data on user reports, action rate, types of action, efficacy of mitigation techniques, training information and appeal rates (submitted and approved). Meta can provide privacy-preserving data sets to independent vetted researchers and civil society organizations, to give insights into how policy is being applied. One model for this is the Twitter Moderation Research Consortium.

Link to Attachment

<u>PC-11196</u>

PC-11195

# Asia Pacific & Oceania

Case number

Public comment number

Region

Layla

Samara

montorla last nome

English

Commenter's first name

Commenter's last name

Commenter's preferred language

## Sada Social Center

Organization

Yes

Response on behalf of organization

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Summary Comment

Terminology is the existence of a culture, history, and feelings. Reducing them is an attack, not a solution. Fair understanding is, and impartial dealing is a basic and necessary requirement.

Full Comment

Meta's current policies in dealing with the word "Shaheed" affect a broad language of discourse used by civil society, journalists, and human rights defenders, especially in the Palestinian territories, where the international community does not deny that these lands are under Israeli occupation, and prevent journalists and human rights workers from using The word "Shaheed" is, according to what the word constitutes, an intense symbol of meaning in the Palestinian and Arab cultural and social environment. This specificity cannot be dispensed with. On the other hand, it contradicts the basics of journalistic work in reporting the news. Their speech, the journalists will then have to modify the context and language of the speech, which takes them out of the circle of his professional work as a reporter of the event. And while Meta attributes its policy to the fact that it seeks to limit the "existence of dangerous organizations and dangerous individuals," it does, with this policy, fully digest the right of the Palestinian or Arab

users to express his grievances. How, for example, can the Palestinians not mention the word "Shaheed" on the journalist Sherine Abu Aqleh, or A Palestinian martyr, Magda Obaid, who was killed by Israeli bullets during the clashes in Jenin camp. On the other hand, the effectiveness of "Reducing Dangerous Organizations and Dangerous Individuals and Reducing Terrorism" collides with what we see as a human rights organization in terms of duplicity that deals through social media platforms between content in Hebrew and similar content in Arabic, as the pages of Israeli media and settlers are filled with phrases calling for the killing of Palestinians. And their displacement, this discourse is emanating from the highest level of government in Israel without any restrictions on social media platforms. The category of dangerous organizations and individuals needs to be comprehensively disclosed and reviewed, as it includes many historical institutions and personalities that are integral parts of the history and culture of entire peoples. The remarkable thing, according to Sada Social's observation, is that these restrictions on the use of the term "Shaheed", as a form of punishment against journalists in particular and Palestinian users in general, did not succeed in stripping the word "Shaheed" of its symbolism, and did not achieve the desired goals of the means of communication in "Reduction of terrorist acts " as you call it, as Palestinian users found themselves initiating other terms that achieve the same meaning as the word Shaheed, and they found in changing the platform was the easiest option to confront this restriction instead of abandoning the symbolism of the word. More generally, from the Palestinian context, the restrictions imposed on the word "Shaheed" ignore the diverse religious and social cultures, especially in the Arab region, which uses the name of a Shaheed to refer to someone who died by burning or drowning, and the inability of the user in these areas to express his feelings or opinion -Whatever it is - is a violation of human rights, as the Universal Declaration of Human Rights guarantees in Article 19 that every person has the right to freedom of opinion and expression, and this right includes the freedom to hold opinions without any interference, and to seek, receive and impart news and ideas by any means without being restricted by borders. geo. We see in Sada Social that submitting the word for review is a positive thing and can mitigate violations and restrictions on users in general and media professionals in particular, and not only with regard to the word "Shaheed" as Meta's algorithms are filled with many restrictions on terms and words that cannot be separated from the Palestinian context and affect the validity of the transmission news. We do not hide our fear about the extent of Meta's ability to fulfill its promises, in light of the many reports issued by human rights organizations, and the latest BSR report was presented to Meta in particular to reconsider its dealings with Palestinian content, without any change or completion of the implementation of the

recommendations of the report as promised by Meta...But for sure, this review is a step in the right direction.

Link to Attachment

PAO 2	2023-01
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# Asia Pacific & Oceania

Case number

Public comment number

Region

Withheld

Withheld

Commenter's first name

Commenter's last name

English

Commenter's preferred language

## Withheld

Organization

No

Response on behalf of organization

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Summary Comment

Shaheed is a term referring to a fallen jihadi.

Full Comment

Jihad is holy war conducted against infidels. The term jihad was originally used in the context of conquering people who did not believe in a single god, called kafirs, with the objective of making them believers in Allah through Islam. As Islam spread and became powerful, the term kafir started being applied to all non-muslims. Jihad then became the justification for conquering Christian and Buddhist lands. The Ottomans qualified their conquest of Europe as a jihad for example. So a shaheed is a casualty in a holy war conducted against members of another religion. It's a term that glorifies a dead combattant while trying to subjugate members of a different faith. There is no place for such a term in our society , in our time. There is no glory in affecting violence on those of a different faith or enemies on non-believers. It is therefore an offensive term that should not be permitted in civilized discourse.

Link to Attachment