

*This letter was sent to Ms. Sissons on Jan 3, 2022. We are now publishing the letter with additional signatories, updated as of Jan 19<sup>th</sup>, 2022.*

To  
Miranda Sissons  
Director of Human Rights  
Facebook Inc. (Meta)

## **Release of the Human Rights Impact Assessment of Facebook in India**

Dear Ms. Sissons,

In 2020, Facebook (now Meta) commissioned the law firm Foley Hoag to conduct a Human Rights Impact Assessment (HRIA) to evaluate its role in spreading hate speech and incitement to violence on its services in India, the company's largest market.<sup>1</sup> A year and a half later, the HRIA has not yet been released. Furthermore, the *Wall Street Journal* recently reported that Facebook's Human Rights team has taken steps that can be perceived as an effort to narrow the scope of, and perhaps stifle, the independent HRIA it commissioned.<sup>2</sup> In response, a Facebook spokesperson said "we look forward" to the report being completed, while Foley Hoag said their work "still is ongoing."

The *Wall Street Journal* report is worrying for a number of reasons. As the whistleblower Frances Haugen's reports have made clear, there is an epidemic of hate speech and disinformation on Facebook's platforms in India, particularly targeting Muslims and other minority groups.<sup>3</sup> Much of this content flagrantly violates community standards, yet it has not been taken down—partly because Facebook has not allocated nearly enough resources to tackling the problem.<sup>4</sup> At the same time, the *Wall Street Journal* has published troubling reports of a pattern of favoritism by FB India toward the ruling BJP party in India, as well as ties between a former FB India staff and the party.<sup>5</sup>

Given these circumstances and indications that the company has not adequately respected the rights of minorities online in India,<sup>6</sup> it is vitally important that an HRIA probing Facebook's human rights impacts in India be thorough, extensive, and entirely independent. Any indication or perception that this is not the case is deeply concerning. We understand that Facebook has narrowed the draft report's scope and demanded more data and made technical objections. This has created the impression that the HRIA is not independent or that Facebook does not wish for certain information to be included.

As human rights and digital rights organizations, we are troubled by reporting that the Human Rights team at Facebook may be involved in shaping the HRIA in any way.

---

<sup>1</sup> [Facebook Ties to India's BJP Under Scrutiny Over Hate Speech | Time](#)

<sup>2</sup> [Facebook Is Stifling Independent Report on Its Impact in India, Human Rights Groups Say - WSJ](#)

<sup>3</sup> [Frances Haugen & Facebook's Failure To Check Anti-Muslim Hate Speech In India — Article 14](#)

<sup>4</sup> [Facebook failed to moderate content in developing countries - The Washington Post](#)

<sup>5</sup> [Facebook's Hate-Speech Rules Collide With Indian Politics - WSJ](#)

<sup>6</sup> [Facebook Services Are Used to Spread Religious Hatred in India, Internal Documents Show - WSJ](#)  
[Facebook Dithered in Curbing Divisive User Content in User - AP](#)

The current perception is that Facebook is not committed to respecting rights in this case. The India HRIA is an important element of Facebook's human rights due diligence and, at a minimum, should be made public, in line with the company's responsibility to respect human rights. The UN Guiding Principles on Business and Human Rights are clear that transparency is a key aspect of human rights due diligence and that in order to account for how they address human rights impacts, companies should "be prepared to communicate this externally, particularly when concerns are raised by or on behalf of affected stakeholders".<sup>7</sup>

Facebook should demonstrate that it is committed to an independent, thorough, and ultimately public HRIA on India, to gain and retain the trust of the human rights and digital rights communities, as well as the billions of users of Facebook's services in India, and to counter the perception that Facebook is resistant to such measures. Members of civil society have shared their time and insight with the lawyers of Foley Hoag. We urge the company to release a public, unredacted, and complete India Human Rights Impact Assessment without delay.

Sincerely,

Access Now  
Accountable Tech  
Amnesty International  
ARTICLE 19  
Article 21  
Association for Progressive Communications  
Citizens for Justice and Peace  
Defend Democracy  
Electronic Frontier Foundation  
Foundation the London Story  
Foxglove  
Global Witness  
Hate Speech Beda  
Human Rights Watch  
India Civil Watch International  
Internet Freedom Foundation  
Mnemonic  
Real Facebook Oversight Board  
Reset.tech  
The Signals Network  
#jesuislà

---

<sup>7</sup> UN Guiding Principles on business and human rights, Principle 21