Dear Members of the Standing Senate Committee on Legal and Constitutional Affairs,

On behalf of Facebook, I am pleased to make this written submission to the Committee for your study of Bill C-76, the Elections Modernization Act.

At Facebook, we take the protection of election integrity on our platform extremely seriously. That is why we are devoting significant time, energy, and resources to this issue. In the lead-up to the U.S. presidential election in 2016, we were slow to identify the new risks and bad actors, and we were slow to act. We are now investing heavily in people and technology to keep our community safe and keep our service secure. This includes using artificial intelligence to help find bad content and locate bad actors. We are shutting down fake accounts and reducing the spread of false news. We have also introduced new ad transparency features and fact-checking partnerships with leading independent fact-checking organizations.

Ultimately, safeguarding our democratic processes is a job for all of us — for governments, civil society, and the private sector. While we cannot and do not, do this work alone - we are committed to making Facebook a force for good in democracy.

Facebook’s Fight Against Misinformation

The battle against misinformation online is obviously much larger than Facebook, but we are cautiously optimistic that we are moving in the right direction with respect to our platform. We are investing heavily both in technology and in people. We have doubled our personnel investment and now have 20,000 people on our safety and security teams, many of whom review reports of bad content and bad actors in over 50 languages, 24 hours a day, 7 days a week.

A good example of the technological investments we are making is our effort to scale up automated detection and removal of fake accounts using artificial intelligence. We have seen repeatedly that bad actors rely heavily on fake accounts, and so we are strongly enforcing against their ability to use them. In the second and third quarters of 2018, we disabled approximately 1.55 billion fake accounts globally, the vast majority of which were removed within minutes of registration and before a human could report them.1 Earlier this fall in Canada, we deactivated two fake accounts involved in the Vancouver municipal election, a development that was featured on the front page of the Globe and Mail.2

There are various degrees of sophistication when it comes to problems related to bad actors and misinformation. The most complex and harmful threats have strategic

1 https://transparency.facebook.com/community-standards-enforcement#fake-accounts
goals such as domestic or foreign interference, and whether they are run by the Internet Research Agency (IRA) out of Russia or other bad actors, these malicious operations have the potential to cause real world harm and we are escalating our efforts to defeat them. As you may know, following an intense investigation, we removed 32 Pages and accounts from Facebook and Instagram this past July in the U.S. because they were involved in coordinated inauthentic behaviour.\(^3\) We removed an additional 652 Pages and accounts for coordinated inauthentic behaviour in August, with some activity originating from Russia and Iran.\(^4\) Most recently, we removed 82 U.S. and U.K. Pages, Groups and accounts in October for coordinated inauthentic behaviour originating from Iran.\(^5\)

The techniques these bad actors used differed from what we saw from the IRA in the 2016 U.S. election. Our efforts to fight these operations will never be done. But increased investments in people and technology, and collaborations and partnerships with other technology companies, the public sector, and with academics and researchers, will help us face this challenge. We intend to continue our work to find and stop this behaviour.

With respect to foreign coordinated inauthentic behaviour, it is worth noting that while we have not observed this type of behaviour targeting interference in Canadian elections, we remain vigilant nonetheless.

**Election Integrity in Canada**

While our federal election isn’t until 2019, we started preparing for this election in 2017, with an eye also toward the number of provincial elections that would happen over the course of the next 2 years. The basis was a report released by the Communications Security Establishment (CSE) that outlined the potential cyberthreats to Canada’s next federal election.\(^6\) Account hacking and misinformation were identified as the biggest threats. In response, we announced our Canadian Election Integrity Initiative\(^7\), a package of five initiatives to help protect election integrity on Facebook.

These include:

- The launch of a new two-year partnership between Facebook Canada and MediaSmarts, to promote digital and news literacy\(^8\);”
- The release of our “cyber hygiene” guide for Canadian political parties and politicians, to support cybersecurity\(^9\);

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\(^7\) [http://facebookcanadianelectionintegrityinitiative.com](http://facebookcanadianelectionintegrityinitiative.com)


o The launch of an emergency Facebook cyber hotline for political parties to help address any cyber challenges in real-time, including suspected hacks;

o The announcement of a Facebook cyber hygiene training program open to all Canadian federal political parties; and

o An advertising transparency test in Canada enabling users to click "Info and Ads" on a Facebook Page and see all the ads that are running from that Page, whether or not the person is in the intended audience for the ad.

This last element launched first in Canada in November 2017, and is now available across our global network.

Since that initial announcement, we have taken additional steps specifically to address the spread of misinformation. In June we launched a third-party fact-checking partnership\(^{10}\) with *Agence France-Presse* (AFP)\(^ {11}\), to engage Canadian fact-checkers to review news stories on Facebook in French and English in order to rate their accuracy. We do not believe that Facebook should be the arbiter of truth, which is why we are partnering with independent fact checkers to ascertain the facts on any given issue. Stories that the AFP rate as false have their distribution reduced in News Feed, dropping future views on average by more than 80%. Facebook will also send notifications to anyone who has shared, and anyone who is about to share, the false story advising them that the story has been fact-checked.

Through our partnership with Media Smarts, we are working to help people spot false news in order to make more informed decisions, including what they share. Our joint program, called "Reality Check", currently includes videos, tip sheets and interactive games in French and English.

**Facebook Supports Bill C-76, the Elections Modernization Act**

Bill C-76, the *Elections Modernization Act*, would, among other things, restrict entities from knowingly selling advertising space to foreign parties. A recent amendment to C-76 by Member of Parliament Ruby Sahota would also create an obligation for certain online platforms to maintain a registry of partisan and election ads during the pre-campaign and campaign periods as defined by the Bill. The amendment further provides that the person or group that requests publication of partisan and/or election ads during these periods must provide these online platforms with all the information necessary to comply with this new obligation. Facebook supports Bill C-76 and will comply with these requirements should the Bill receive Royal Assent.\(^ {12}\)

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\(^{10}\) [https://www.facebook.com/help/1952307158131536](https://www.facebook.com/help/1952307158131536)

\(^{11}\) [https://factcheck.amp](https://factcheck.amp)

Conclusion

Fundamentally, the challenges of election integrity and misinformation on our platform are security problems, and there is a broad team at Facebook focused on tackling them including experts from threat intelligence, data science, product, engineering, public policy and legal. We take a multi-pronged approach including manual investigations and automated detection to disrupt these threats. You can never fully “solve” a security problem – threat actors will constantly find new ways to cause harm – but our goal is to make it much, much harder for these actors to operate across our platforms.

Our work is far from done, but we believe our efforts are making a difference. In 2018, there have been four major Canadian elections – provincially in Ontario, Quebec and New Brunswick, and at the municipal level in British Columbia. In each of these elections, we’ve had open channels of communication and collaboration with the respective election commissions, and have been able to respond and resolve areas of concern to all parties’ satisfaction. With every subsequent election, we are learning and refining our techniques, and we feel we are moving in the right direction.

We remain vigilant in the lead-up to the federal election in 2019, and have an ongoing and positive working relationship with the Office of the Commissioner of Canada Elections. We are pleased and comforted that the Commissioner, in his recent Committee appearance before the LCJC confirmed this positive working relationship with Facebook to the Committee, pointing to our longstanding work together dating back to the 2015 federal election (a copy of a letter from the 2015 election from the Commissioner’s Office to Facebook Canada is attached).

In conclusion, we wish to re-emphasize the degree to which Facebook is committed to making the right investments in people and technology to protect election integrity on our platform in Canada and around the world. Working together with partners in government, the private sector and civil society, we are determined to get this right.

Sincerely,

Kevin Chan
Head of Public Policy
Facebook Canada
October 22, 2015

Mr. Kenneth Chan

Dear Mr. Chan,

I would like to extend our most sincere thanks to you and your team for your exceptional work during the 42nd general election.

As we enter a new era of campaigning in Canada, I believe it is important to underscore just how valuable your advice and guidance were to our team of investigators. Not only did you provide our office with important insight into how Facebook could be used by political parties, candidates, stakeholders and ordinary Canadians throughout the campaign, you also helped us to understand and identify potential legal impediments to accessing information and removing non-compliant material. Furthermore, during the election period itself, your cooperation and swift action on a number of key files helped us to quickly resolve a number of issues and ultimately ensure compliance with the Canada Elections Act.

Once again, and on behalf of all us in the Office of the Commissioner of Canada Elections, thank you very much.

Sincerely,

Eric Ferron
Senior Director of Investigations
Office of the Commissioner of Canada Elections