

AJC Transatlantic
Institute



B'NAI B'RITH
INTERNATIONAL



Brussels, 14 September 2020

Dear President of the European Commission, Ursula von der Leyen,

Dear Executive Vice-President Margarethe Vestager,

Dear Vice-President Vera Jourova,

Dear Vice-President Margaritis Schinas,

Dear Commissioner Thierry Breton,

The undersigned major Jewish organizations working with the EU institutions welcomed the public consultation on the forthcoming Digital Services Act as an opportunity to strengthen accountability for platforms and ensure a safe online space, aligned with the motto *A Europe fit for the Digital Age*.

To do so, the Digital Services Act must take concrete steps to address antisemitism and other forms of hate. A 2018 Fundamental Rights Agency survey on Experiences and Perceptions of Antisemitism among Jews in the EU found that 89% of respondents consider antisemitism expressed online as a problem and 80% of those experiencing antisemitic abuse have encountered it online. These statistics have only been exacerbated by the Covid19 pandemic.

A revised EU digital framework must tackle head on the role and responsibility of online platforms and must guarantee users' safety. Following the formal consultative process, we have put forward a unified position - a summary set of points for policymakers to effectively tackle antisemitic content online and demand higher accountability from online platforms and service providers:

- 1. Act against antisemitism and any other form of hatred whenever you see them – online and offline.** Being explicit about addressing antisemitism is key. The Digital Services Act must reflect the strong commitment of the European Commission to fight antisemitism.
- 2. Define antisemitism to fight it.** The European Parliament, the Council of the European Union as well as 27 member states have endorsed the International Holocaust Remembrance Alliance (IHRA) working definition of antisemitism. The Digital Services Act should provide guidance and encouragement for platforms to adopt and use the definition to identify and counter antisemitic content.

3. **Tackle antisemitism across digital policy areas.** Antisemitism must be addressed in all areas of digital policy, such as illegal terrorist or violent content, tackling disinformation, regulating sales of products online and consolidating digital resilience.
4. **Mandate comprehensive and recurring data analysis to better understand the spread of antisemitism online, including through conspiracy ideologies.** Aligned with the protection of privacy and personal data, the Digital Services Act must ensure the availability of data to better understand the mechanisms by which antisemitism spreads online. Catalogues of symbols and tropes, and mapping of the flow of conspiracies online can be useful starting points.
5. **Make AI-based processes transparent and prevent them from leading users towards conspiratorial or extremist content.** Making algorithms public will enable users and experts alike to challenge and address algorithms that funnel users from mainstream content to conspiracy ideologies and extremist content.
6. **Educate fact-checkers and content moderators about antisemitism.** Along with the use of the IHRA working definition of antisemitism as a reference point, educating monitors, fact-checkers and content moderators about the manifestations, sources, history and impact of antisemitism is key. This will ensure their effective work to address antisemitism online.
7. **Strengthen civil society and support NGOs to act effectively against hate online.** Raising public awareness through positive content, counter narratives and educational materials is essential to building societal resilience against the threat of disinformation and conspiracy myths. Help create these capacities for civil society organizations to tackle antisemitism online, with platforms and policy-makers.
8. **Address antisemitism on all social media platforms, including alternative platforms and service providers.** While major social media companies have taken significant voluntary steps to counter online hate, individuals and networks of extremists have migrated to smaller, alternative platforms. The Digital Services Act must ensure that hate speech as defined by the existing IT Code of Conduct is not permitted on any platform.
9. **Disincentivise hate for profit.** The Digital Services Act should address ad revenue stemming from content that promotes antisemitism and other forms of hate as well as profits from sales of antisemitic merchandise, notably Nazi memorabilia.



10. Encourage innovative, educational, and preventive strategies to countering hate that focus on protection and respect for diverse communities. Ensure that such strategies offer a balanced approach to protecting all minorities while respecting freedom of speech, resulting in an online space free of hate.

The Digital Services Act will govern the EU's approach to an increasingly digitalized world for years to come. Therefore, the opportunity cannot be missed to address essential components of digital governance, that prioritize user safety and a human-centered approach. We trust the tenets above will be reflected in the forthcoming legislation.

Yours Sincerely,

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AJC Transatlantic Institute

[Redacted signature]

B'nai B'rith Europe

[Redacted signature]

B'nai B'rith International

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CEJI

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European Jewish Congress

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European Union of Jewish Students

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World Jewish Congress