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**SUBMISSION OF MANUSHYA
FOUNDATION TO THE
GLOBAL DIGITAL COMPACT**



SUBMISSION BY

Manushya Foundation

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A. INTRODUCTION

1. We are grateful for the opportunity to deliberate on the [third](#) revision of the Global Digital Compact (GDC) on the 22 of August 2024. We note that we received a copy of the fourth revision that was once again released under silence procedure on 27 of August 2024.
2. We are deeply frustrated and disappointed by the recent actions surrounding the development of the GDC. Despite inviting us to a virtual "multistakeholder" meeting on 22 August, a fourth revision of the document was released on 27 August 2024 under a silence procedure, once again bypassing any form of transparent and inclusive consultation. This blatant disregard for meaningful engagement makes a mockery of the entire process and leaves us feeling like mere tokens in a process where critical decisions are being made behind closed doors without our input.
3. The GDC, in its current form, poses serious challenges and risks undermining the very principles it seeks to protect. In the document, it was noted that it is the goal of the GDC to create an "inclusive, open, sustainable, fair, safe and secure digital future for all" (paragraph 4). Yet, we believe that its current approach lacks the necessary safeguards to ensure these goals are genuinely realised.
4. We demand establishing more transparent processes should the GDC get approved at the Summit of the Future next month. This should include regular public updates and opportunities for feedback from a diverse range of stakeholders, particularly from the civil societies to ensure that the Compact is shaped by a multitude of voices.
5. Multistakeholderism is facing a slow but steady demise at the United Nations, being increasingly replaced by a more state-centric approach—multilateralism. The shift towards multilateralism is evident in recent global initiatives and treaties. Multilateralism, under the guise of 'digital cooperation' and 'digital sovereignty', diminishes the diversity of perspectives in policy-making processes and risks overlooking the needs and rights of internet users, particularly those from marginalised and underrepresented communities. The future of the Internet



should not be determined by governments alone but shaped by the collective input and collaboration of the global community.

6. Building on the discussions thus far, we strongly advise **against** the GDC's objective to centralise Internet governance through the Office of the Secretary-General's Envoy on Technology. This is contrary to the very nature of the Internet that fosters innovation and open access. This centralisation could mirror authoritarian practices of several governments around the world, which severely limit freedom and transparency through firewalls and the concept of 'sovereign Internet'. Further, the Compact must make **specific, enforceable commitments to human rights that go beyond mere references to international law**. This includes addressing issues such as encryption backdoors and state surveillance that significantly impact privacy and freedom of expression. The current transcontinental campaign by various governments against encryption is a stark example of how state interests can collide with fundamental rights. Many governments are pushing for mandatory encryption backdoors, ostensibly to combat crime and terrorism, but this comes at an enormous cost to individual privacy and security. When governments demand backdoors, they undermine the very foundation of digital security. These backdoors would not only make systems more vulnerable to hacking and data breaches but would also give states unprecedented access to private communications, potentially leading to widespread surveillance and abuse.
7. The GDC must **address the issue of corporate overreach**. It should include stringent regulations that go beyond posturing and non-binding guidelines that serve no one but the investors. The excessive influence of large technology corporations in digital governance needs to cease and they must not be left to their own devices to self-govern. This would involve establishing clear guidelines with teeth for corporate accountability, particularly in areas related to data protection, ethical AI use, and transparency in algorithmic decision-making. Ensuring that these guidelines are enforceable and subject to regular oversight will help maintain a balance between innovation and individual rights protection.



Vision of Manushya Foundation

8. [Manushya Foundation](#) is firmly dedicated to dismantling the power structures that dominate digital spaces, subverting hierarchies that have long dictated the flow of information and technology. Our mission is to reforge digital ecosystems so that they are truly democratic, equitable, and uphold the rights of the oppressed and marginalised. We reject the prevailing digital governance models that disproportionately amplify state and corporate powers, often trampling individual freedoms and community autonomy in the process.
9. We see the digital domain as a battleground where class struggles are intensified by technologies that are designed to control rather than liberate. By advocating for digital ecosystems that prioritise communal well-being over profit, we challenge the very foundations upon which current digital policies are built.
10. **The latest revision of the GDC is a testament to the systemic failures in addressing the core issues of digital equity and rights. This submission, structured around significant thematic deficits in the GDC, underscores how the document perpetuates inequalities and fails to propose mechanisms that genuinely protect against digital exploitation and surveillance.** In this pursuit, we are not just opposing a document but a broader system that sees technology as a tool for governance and control, rather than for empowerment and liberation. Our vision compels us to demand an overhaul of how digital policies are crafted, insisting on a decolonised model where power is wrested from the few and shared amongst the many. We envision a digital future where technology serves the people, all power structures are held accountable, and the voices of the historically silenced lead the chorus calling for change.



B. KEY CONCERNS

Internet governance

11. The GDC's objective to centralise Internet governance through the Office of the Secretary-General's Envoy on Technology is fundamentally opposed to the qualities that have fostered the Internet's growth and resilience. Revision 4 further cements this by introducing a formal mechanism (implementation map) (paragraph 71) that standardises oversight and potentially restricts the organic evolution and decentralisation that have been crucial to the internet's success. By advocating for a centralised governance model, **the GDC risks adopting approaches seen in authoritarian countries**, where government control over the Internet has led to severe limitations on access and extensive censorship.
12. While we welcome the inclusion of **paragraph 28** in the fourth revision of the GDC, acknowledging the importance of the Internet Governance Forum as the primary multistakeholder platform for discussing internet governance issues, we must also express caution. This recognition must go beyond mere lip service and translates into meaningful engagement, ensuring that all stakeholders, especially those from marginalised and underrepresented communities, have an effective voice in shaping the future of internet governance. Without substantial support and real influence in decision-making processes, the recognition of the IGF risks being symbolic rather than transformative.
13. The proposed AI scientific panel is **redundant** given the extensive coverage of digital and AI issues by established organisations like UNESCO and the International Telecommunication Union. (Paragraph 56(a))
14. The proposal for "High-Level Review" (paragraph 74) during the 82nd General Assembly session is **superfluous**, given the existence of current mechanisms such as the Internet Governance Forum. The current proposal for intergovernmental consultations not only risks centralising control but it has the potential to severely restrict the inclusive and open participation of all relevant stakeholders, which goes against the foundational goals of global digital cooperation.



15. The GDC glosses over the fact that the economic benefits of cross-border data flows are unevenly distributed. This poses a significant risk of marginalising developing nations even further, relegating them to the role of data providers and guinea pigs for developed nations. We in the Global South refuse to just be mere data suppliers to wealthier nations and contribute valuable data without adequate compensation or technological reciprocation.
16. Paragraph 63 calls for increased investment from the private sector and philanthropy to drive technological advancement. **This profit-driven investment model is predatory and exclusionary, as it hinges the development of vital digital technologies on the fluctuating interests and whims of corporate and philanthropic entities. We urgently call for sweeping global tax reforms aimed at dismantling tax havens and curbing tax evasion by multinational corporations and affluent individuals.** These reforms are crucial to significantly boosting government fiscal capacities, enabling them to invest robustly in digital infrastructure and innovation directly. Such public investments are essential to ensure that technological development serves the broader public interest and supports equitable access, rather than being dictated by profit motives that often sideline the needs of the most vulnerable.
17. **We reject the top-down approach to Internet governance,** which has shown to be ineffective and detrimental in various contexts. This method not only threatens the open Internet but also fails to incorporate lessons from the failures of centralised control observed globally. We demand a shift towards the fulfilment of a truly inclusive governance model that accurately reflects the decentralised and interconnected nature of the Internet.

Lame human rights commitments

18. **The removal of the words ‘climate change’ from paragraph 11(e) strongly alludes to an ongoing campaign of climate denial, reflecting a disconcerting alignment with interests that seek to downplay the severity and importance of this global crisis.** This omission not only signals a withdrawal from the proactive stance needed to tackle environmental issues but



also suggests a capitulation to factions that deny the scientific consensus on climate change. **This is particularly alarming given the substantial environmental impact of technologies like large language models (LLMs), which significantly contribute to greenhouse gas emissions, escalate water consumption, and add to the hazardous waste produced by semiconductor manufacturing.** This omission from the document is deeply irresponsible and undermines the critical need for integrated environmental responsibility in technological development and policy-making.

19. **The lack of explicit commitments to the rights of workers in the GDC is a reprehensible failure. At a time when digital transformations are significantly impacting labour markets worldwide, this neglect to secure and articulate protections for workers is a stark betrayal of fundamental human rights. It is an indication that the interests of workers, who are the backbone of the digital economies, are being blatantly ignored in favour of corporate and technological advancement.** This lack of commitment is a gross injustice, perpetuating vulnerability and exploitation in the workforce. It is absolutely crucial, and a moral imperative, that firm, enforceable protections for workers be integrated into the core of our digital policies to ensure a just and equitable digital future for all labourers.
20. The use of broad, non-specific language throughout the Compact provides ample room for states to interpret these terms in ways that could justify extensive surveillance and control measures under the pretence of national security, cultural preservation or so-called 'digital sovereignty'. This opens **potential pathways for authoritarian practices to be codified under international guidelines**, posing a significant risk to freedom of expression and privacy.
21. The removal of the explicit references to the principles of "legality, necessity, proportionality, and non-discrimination" when it comes to Internet shutdowns in the fourth revision (paragraph 29d) is a betrayal of international human rights standards. Instead the text now says, "in accordance with international law, including with national legislation compliant with international law". This change starkly reveals whose interests the GDC truly favours. The omission of these critical terms paves the way for governments to justify broader, more subjective restrictions on internet access under the pretext of aligning with national



legislation or 'digital sovereignty'. **This specific paragraph dilutes the commitment to upholding user rights within the digital realm but also signals a dangerous concession to state-centric control over digital spaces, potentially leading to more frequent and arbitrary internet shutdowns and restrictions.**

22. The mere reference to "international law" in clause 31(d) (*previously clause 30(d)*) and 23(d) is employed to circumvent real accountability. **Historical and ongoing abuses by states under the pretext of adhering to international law illustrate how vague commitments enable states to perpetrate violations.** Furthermore, the GDC's silence on critical issues like encryption backdoors, which some governments aggressively advocate for, could drastically undermine privacy rights and penalise activism.
23. The omission of "sexual and gender-based violence" (paragraph 30(e) in revision 3; 31(e) in revision 4) is a concerning development. This specific type of violence is a critical issue that requires explicit attention and dedicated measures to effectively address. By removing these references, the revision potentially downplays the severity and specificity of the challenges associated with combating gender-based violence in digital spaces. It also raises questions about the commitment to prioritising and adequately addressing these forms of violence, which are known to have profound and pervasive impacts on victims, predominantly women and girls, across all digital platforms.
24. The Compact neglects to specify mechanisms for protecting against **known risks such as state surveillance technologies**, which have been used to suppress dissent and monitor minority and vulnerable populations. The GDC must address the challenges posed by new surveillance technologies, including facial recognition and predictive policing tools, which are being integrated into public security systems without sufficient oversight or regard for privacy and civil liberties. The absence of strong provisions that encourage the use of strong encryption and anonymity tools that can help individuals protect their privacy against state intrusion weakens the privacy assurances the GDC should provide. This omission is critical in the light of ongoing global debates on privacy and surveillance, exemplified by controversies surrounding technologies like the Pegasus spyware. There should be sufficient mechanisms within the GDC to



hold states accountable for surveillance abuses. This lack of accountability enables states to continue invasive monitoring practices without facing significant consequences, eroding trust in digital spaces. (Paragraph 31(d))

25. Without explicit commitments to **enforce** human rights standards, the GDC risks becoming yet another non-binding declaration rather than a powerful tool for change. The absence of clear enforcement mechanisms allows states to bypass international human rights obligations, leaving individuals vulnerable to digital rights violations.
26. The process of drafting the GDC has sidelined crucial stakeholders, particularly civil society organisations that champion digital rights. This exclusion is symptomatic of a larger issue within international policy-making processes, where the voices of those most affected by digital policy are often the least heard.
27. The GDC's **softened stance on corporate accountability** in the digital realm, especially surrounding data protection and technology deployment is particularly concerning. These paragraphs (Paragraphs 32(a-d), 36 (a-c)) benefit corporate interests at the expense of citizen protections. The reliance on corporate self-regulation is not merely a flawed policy choice; it is a fundamentally flawed approach that has consistently prioritised corporate profit over public welfare. History is littered with evidence on how corporations have repeatedly sacrificed privacy and ethical standards for growth and stakeholder revenue.
28. The removal of the term 'regulatory communities' from paragraph 17 in the fourth revision undermines the integrity and effectiveness of our collective efforts towards achieving the SDGs through digital transformation. By excluding regulatory bodies from these pivotal partnerships, we risk fostering a governance vacuum that could lead to regulatory capture, where digital spaces are dominated by a handful of powerful interests at the expense of the collective good. This absence of regulatory oversight will allow private entities to shape digital landscapes to their advantage, marginalising broader societal needs and undermining the equitable principles that should govern digital developments. This removal also makes any other references to regulation within the GDC merely symbolic, including those in paragraphs 19, 21(b) and 47.



29. The inclusion of terms such as "predictable and transparent" and specific emphasis on enhancing "productivity," "facilitating the growth of e-commerce," and "improving competitiveness" in revision 4's Paragraph 19 underscores a shift towards this obsession with market-driven approach. All these new additions suggest a framework that is overly aligned with the needs of business. This paves the way for a regulatory environment that will favour established, larger entities capable of navigating or influencing such "predictability", leading to a form of regulatory capture where the rules of the digital game are skewed in favour of those with the resources to shape them. The changes introduced in the fourth revision of the GDC, which emphasise a more market-driven approach to digital inclusion, must be critically reassessed and reverted.
30. The second draft of the GDC previously emphasised the OHCHR's proactive role in providing expert advice and practical guidance on human rights and technology issues to various stakeholders, including governments and the private sector. The third and fourth revisions, however, dilute this commitment. It merely 'acknowledges' the OHCHR's efforts and specifies that these are offered "upon request and within existing and voluntary resources." **This language shift effectively repositions the OHCHR's role from being an active, initiating force in digital human rights to a more passive, on-demand service.** This reactive approach limits the OHCHR's ability to proactively influence policies and reduces its capacity to serve as a global advocate for digital human rights. (Paragraph 24).
31. Further, in revision 3 (paragraph 68), ITU, UNCTAD, UNDP and UNESCO were requested for support. Yet, in revision 4 (paragraph 69), it was watered down to "invite". This indicates a shift from a more directive to a more suggestive tone. Again, the references to the work of OHCHR was explicitly diluted from "we acknowledge OHCHR's support to Compact implementation as it relates to respect for, protection and promotion of human rights" down to "as well as OHCHR, to support, within their existing mandates, implementation of this Compact". This weakening of language suggests a retreat from a proactive stance on human rights issues, at a time when the digital world is increasingly intersecting with fundamental human freedoms and the need for rigorous



protections. The Compact's shift to a less committed, more ambivalent stance on human rights oversight is alarming and undermines the very foundations of what the Compact should stand for.

32. By inserting "upon request," the **GDC imposes a conditional access to the OHCHR's expertise**, dependent solely on external demands rather than a sustained, guaranteed involvement. This condition could lead to underutilisation of the OHCHR's capabilities in regions or by stakeholders who may be less inclined to prioritise human rights in digital governance. (Paragraph 24)
33. The GDC misses an opportunity to promote harmonisation of privacy laws across jurisdictions, which could help prevent states from exploiting legal loopholes to conduct cross-border surveillance and data collection without adequate checks.

Overemphasis on technological determinism

34. By positioning technology as the central force in societal transformations, the GDC fails to adequately address the significant roles that individuals, communities, and policymakers play in shaping the use and impact of digital technologies. This omission can lead to a misunderstanding of how technologies should be designed, regulated, and applied within various social contexts.
35. The deterministic view propagated by the GDC sidelines the essential contributions of diverse stakeholders, including civil society, technology experts, and end-users, who bring crucial perspectives on the ethical, social, and cultural implications of technology. This lack of inclusion risks creating policies that are not only unrepresentative but also potentially harmful in their application.
36. **By underplaying the role of decision-makers such as venture capitalists, investors and politicians behind technologies, the GDC does not sufficiently hold accountable those who design and deploy technology.** Without a strong emphasis on governance and ethics, there is a risk that technological development will proceed without sufficient safeguards, potentially leading to significant adverse impacts on society.



37. The deterministic view leads to an overreliance on technological solutions for social challenges, overlooking more effective or necessary political, social, or economic interventions. This can divert attention and resources from addressing the root causes of societal issues, **promoting a tech-utopianism mentality that is neither suitable nor sustainable.**

Insufficient engagement with civil society

38. Civil society groups, which include human rights organisations, grassroots activists, and community advocates, have historically played a crucial role in highlighting and advocating for public interests and rights in digital policy discussions. The GDC's drafting process has not adequately included these voices, leading to a framework that may not fully represent the diverse needs and rights of the global population.
39. The GDC calls for civil society endorsement without having meaningfully involved these groups in the drafting process. This approach not only seems **disingenuous** but also suggests a **superficial compliance** with inclusivity norms rather than a genuine commitment to participatory governance. (Paragraph 65)
40. The GDC should adopt a **genuine** multi-stakeholder approach, not just 'multi-stakeholder' by name, to ensure that civil societies are involved in an ongoing and substantive manner throughout the policy formulation and revision processes. This engagement should be structured to ensure that civil society contributions are not only heard but actively shape the outcome. Beyond drafting, civil society organisations should play a key role in the monitoring and evaluation of the GDC's implementation. Their independent oversight is crucial for holding states and corporations accountable for the commitments made under the GDC.



C. FINAL STATEMENT

27. In light of these grave concerns, we reject the current iteration of the Global Digital Compact. The adoption of the GDC in its current form will have severe and far-reaching consequences for Southeast Asian nations, where digital rights are already precarious. The Southeast Asian region is characterised by a diverse set of political landscapes, with several member states exhibiting authoritarian tendencies. The centralisation of Internet governance proposed by the GDC threatens to empower these regimes further, providing them with additional tools to control online spaces, stifle dissent, and silence critical voices. This is particularly concerning in countries where governments have increasingly relied on digital repression to maintain power. The Compact's vague commitments to human rights, along with its failure to address critical issues like state surveillance and data privacy, could exacerbate the already rampant digital abuses in the region, leaving activists, journalists, and ordinary citizens vulnerable to government overreach. The GDC, as it stands, could facilitate the **rise of digital dictatorships** across Southeast Asia, eroding the hard-won freedoms of millions in the region.

28. We demand a thorough reconsideration of this document, with genuine input from civil society and human rights experts, to ensure that it truly serves the interests of all people, not just the powerful few. The United Nations must not allow itself to become a tool for authoritarian regimes and corporate interests. It must reaffirm its commitment to protecting human rights in every aspect of the digital world.



Submission of Manushya Foundation to the Global Digital Compact



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About Manushya Foundation

Manushya Foundation, deriving its name from the Sanskrit word for 'human being', is an intersectional feminist organisation deeply committed to reinforcing human rights, equality, and justice. With a focus on challenging the structures of power that perpetuate inequality, the foundation mobilises communities across the Global Majority to build collective strength and digital resistance. Manushya stands in solidarity with local communities, women human rights defenders, and all marginalised groups, prioritising the voices of those often silenced: women, LGBTIQ+ individuals, youth, democracy defenders, indigenous peoples, people with disabilities, and religious minorities, including the Rohingya and Malayu Muslims.

The foundation's mission is to create a movement that empowers these groups to fight back against digital repression and build a new digital world order that serves the many, not the few. By sharing stories from the frontlines, conducting grassroots research, and collaborating on innovative strategies, Manushya Foundation aims to resist digital dictatorship and restore democratic freedoms online and offline. Our work is crucial in defending the hard-won freedoms that remain and in pushing back against ongoing efforts to erode these rights. Together, we are stronger, united in the struggle for a just and equitable future for all human beings.



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