



Friday, August 21st, 2020

Chief Electoral Officer of Canada
Elections Canada
By email: consultations@elections.ca

To Whom It May Concern:

IAB Canada on behalf of its members, would like to thank you for providing us with the opportunity to respond to your discussion paper “The Impact of Social Media Platforms in Elections”. The Canadian online advertising industry is more prepared than ever, to help navigate the issues that were tabled within the document and to look more closely at social media and digital advertising platforms and their impacts on elections and democracy. As representatives of the Canadian digital advertising industry, we hope that our feedback and participation will be useful.

During the last Federal Election, IAB Canada on behalf of most of the digital publishers in Canada affected by C-76, worked closely with the team at Elections Canada. Liaising between industry stakeholders responsible for developing and maintaining registries and Ottawa, we managed to bridge a major communications gap on the guidelines that resulted from the amended Elections Act. Our work dealt specifically with the registry requirements of Bill C-76 and the complexities surrounding issues ads. Given the absence of a centralized mechanism from Elections Canada to identify which issues would fall under regulation, IAB Canada moved quickly to build an effective technical solution to ease compliance in the context of a dynamic digital media marketplace. Through this project we also managed to increase critical facetime for industry members with the Elections Canada team to provide added clarity on the registry guidelines.

It is our hope that we can continue to work with government to help educate and modernize resources that will mitigate unintended consequences of incoherent policy changes. Moving forward, IAB Canada and its membership strongly recommend that Elections Canada remove the burden from publishers of monitoring issue advertising altogether. Additionally, we find that Elections Canada should develop and maintain a centralized registry for political advertisers to lessen both the financial responsibility and the risk of falling out of compliance for digital media publishers in Canada. Such a centralized registry would provide consistency, clarity on required fields and greater access and transparency for citizens.

We acknowledge the complexities of developing a registry of this nature and urge Elections Canada to consult with industry to determine the appropriate requirements, best practices and process flows to ensure its successful implementation. Building out a digital infrastructure must involve inputs from industry as there will inevitably be access points required from many IAB Canada members.

We look forward to productive discussions as we collectively work toward modernizing our mutual digital capabilities to bring Canada to the forefront of global digital innovation and economic growth while simultaneously protecting the electoral process.

About IAB Canada:

Established in 1997, IAB Canada is a not-for-profit association exclusively dedicated to the development and promotion of the rapidly growing digital marketing and advertising sector in Canada.

IAB Canada represents over 250 of Canada's most well-known and respected stakeholders in the digital advertising and marketing sector, including advertisers, advertising agencies, media companies, digital media publishers and platforms, social media platforms, adtech providers and platforms, data companies, mobile and video game marketers and developers, measurement companies, service providers, educational institutions, and government associations operating within the space. Our members include numerous small and medium sized enterprises.

Companies in the digital advertising and marketing sector offer a wide range of highly innovative products and services, including valuable service offerings to individual Canadians. This sector is intensely competitive, and the long-term success of our members is fundamentally predicated on their ability to continually design, develop, offer and improve valuable digital products and services.

Our members represent over 80% of the estimated \$8.5 billion industry in Canada. IAB Canada has a long history of creating programs that are designed to promote the responsible growth of the online advertising industry in Canada. Notably, IAB Canada was the founding member of the self-regulatory Ad Choices Program developed to enable industry compliance within the PIPEDA framework and continues to lead the charge on the modernization of privacy compliance in Canada.

IAB Canada is the only organization fully dedicated to the responsible growth of digital/interactive advertising in Canada by delivering:

- Globally accepted digital ad standards;
- Advocacy for the Canadian digital advertising industry to the Canadian government;
- Trained human capital, through globally standardized courses, certification and custom workshops;
- Original Canadian digital marketing research; and,

- Information to the industry and enhanced communication between members.

IAB Canada would like to submit comments addressing three core areas of the “The Impact of Social Media Platforms in Elections” discussion paper:

1. Transparency
2. Access to Reliable Information Related to the Electoral Process
3. Trust in the Electoral Process

Transparency

What changes, if any, should be made to the CEA’s existing ad registry requirements? Should the registries be expanded to include content that is not an ad, such as organic posts?

While “organic” governance falls outside of the IAB Canada remit, our view is that the inclusion of non-paid ads, within the registry, would significantly complicate the registry’s functionality. Given the enormous volume of user generated content across platforms and the complexity involved in monitoring this content for sentiment, issue identification and standardized taxonomy, the attempt to include organic content would hamper the progress and accuracy of the paid-advertising efforts.

Should registries be required to provide other kinds of metadata beyond who posted the ad, such as its cost and/or targeting criteria?

Due to the broad nature of digital media in the Canadian landscape and the varied ways in which the medium is purchased, the inclusion of additional granularity to the registries would have to reflect the lowest common denominator in available parameters. Some domestic media entities, for example, would not have the same targeting capabilities as foreign platforms and would not only represent an onerous operational process to media publishers with limited resources but also inevitably create a major gap in reporting. This will impact the overall credibility of the registry.

Who should be responsible for maintaining them? Why?

Elections Canada should govern a centralized registry in order to provide consistency and credibility in the view of citizens. This would allow for any changes to be made systemically without incurring extra operational strain on publishers or platforms. This centralized solution would also benefit Elections Canada as it may eventually be able to connect to other data resources collected by Government.

What regulation, if any, should there be around the targeting of political ads?

IAB Canada feels that there should be consistency across all advertisers when it comes to the available technology to target audiences in Canada. Political advertisers should be held the same account as other advertisers with regards to privacy, data collection and CASL legislations.

Should the use of algorithms in data-driven digital advertising be regulated? If so, how?

Data-driven digital advertising is currently regulated under PIPEDA and CASL. IAB Canada feels that this is sufficient regulation.

Access to Reliable Information Related to the Electoral Process

Should there be regulation to require all digital and social media platforms to delete inaccurate or misleading content on where, when and ways to vote? If so, what sort of regulation?

Most platforms have committed within their policies to leverage AI to identify and address inaccurate or misleading content on where, when and how to vote. We would recommend a review of these policies to determine the parameters and to help provide guidance or recommendations on areas of focus for future taxonomy programming.

IAB Canada strongly recommends that the government utilize social media platforms to advertise accurate information to citizens leveraging the Elections Canada brand and the geo-targeting capabilities of the platforms to ensure Canadians have high visibility into where, when and how to vote straight from the source.

How should Elections Canada work with other stakeholders (platforms, regulated actors, civil society groups, researchers) who may be involved in this field?

IAB Canada would recommend working with trade associations, such as IAB Canada, to ensure that the publishers and platforms are well informed on taxonomy and the specific concerns of Elections Canada. Industry can move quickly when concerns are well articulated and organized. Individual platforms and publishers will have varying resources and when regulations are too prescriptive, without a clear understanding of respective stakeholder capabilities, the industry at large fails to be set up for success.

Should digital and social media platforms have legal obligations to report publicly on any accounts or content they have removed? If so, exactly what information should they be required to report publicly?

IAB Canada would strongly recommend assessing each platform's policies and technical abilities on an individual basis to determine whether basic incident reporting is available.

Should further measures be taken by social media platforms to reduce the spread of potentially harmful inaccurate and/or misleading information in private spaces?

Most platforms have developed frameworks to address private spaces and continue to work on in-feed content policies. Again, industry stakeholders are best suited to determine *how* the platforms can be modified to reduce potentially harmful inaccurate and/or misleading information in private spaces.

What are the risks for elections administrators such as Elections Canada in using digital and social media platforms to reach electors? What mitigating measures could be adopted to manage these risks?

As previously stated, IAB Canada would highly recommend that Elections Canada utilize the social media platforms to deliver accurate, official and trusted information about elections to Canadians. Paid advertising provides the ability to deliver high frequency and high reach in the very areas of the internet that are in question.

Trust in the Electoral Process

What additional role, if any, should Elections Canada play to build trust in elections and democracy? What role should other actors play in this area?

Elections Canada should ensure that all Canadian media channels are leveraged to communicate accuracy and truth throughout the electoral process. We would recommend a robust media campaign, that includes all media channels, encouraging Canadians to vote and providing them with the information on how to do so.

Additionally, IAB Canada recommends exercising caution with regards to any significant amendments that will negatively impact Canadian news media platforms. During the Covid-19 pandemic, we clearly saw that Canadians turn to news channels for trustworthy content with a +50% increase in time spent in these channels. Elections Canada must acknowledge this reality by collaborating with industry to ensure consumers continue to receive accurate information throughout this critical period without onerous constraints that may deter domestic platforms from active involvement in elections content.

Summary

On behalf of IAB Canada, and all of its members, we thank you for the opportunity to submit our responses to the important questions being asked by the Elections Canada in regard to the impact of social media platforms in elections. We look forward to continuing a collaborative approach to modernizing our digital capabilities to bring Canada to the forefront of global digital innovation and economic growth while simultaneously protecting the electoral process. If you have any questions or require any further information, please do not hesitate to reach out.

Sincerely,

A handwritten signature in black ink that reads "Sonia Carreno". The signature is written in a cursive, flowing style. It is placed on a light gray rectangular background.

Sonia Carreno
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