

GNI Input to the WSIS+20 Review Elements Paper Consultation

The [Global Network Initiative](#) (GNI) is the leading multistakeholder forum for accountability, shared learning, and collective advocacy on government and company policies and practices related to technology and human rights. GNI is a [membership](#) organization comprising over 100 academics, civil society organizations, investors, and technology companies. We have members on every populated continent, with nearly one-third based in the majority world.

GNI has [participated](#) in past consultations part of the World Summit on the Information Society +20 Review Process (WSIS+20), including the [Open Consultation Process](#) held in March 2025 and the [virtual](#) Stakeholder Consultations held in June 2025. We are a member of the [Global Digital Rights Coalition](#) and endorse the group's [submission](#) to this consultation. We are also a signatory to the cross-stakeholder “[five-point plan](#)” and “[eight recommendations](#)” for an inclusive WSIS+20 review. We thank the Co-Facilitators and the WSIS Secretariat for continuing to provide opportunities to participate in the consultations and anticipate positive and rights-respecting developments in Internet Governance. Our responses to the questions posed in the consultation are outlined below.

1. What are the most important achievements arising from WSIS that should be highlighted in the Zero Draft?

The World Summit on the Information Society (WSIS) did not just bring stakeholders together—it helped establish multistakeholder collaboration as the norm, paving the way for spaces like the Internet Governance Forum (IGF), which remain essential for open and inclusive digital policymaking today.

It also marked one of the first global efforts to place human rights, such as freedom of expression, access to information, and privacy, at the heart of digital governance and development. That early commitment continues to shape initiatives like GNI, where our members have put those principles into practice through transparency reporting and human rights due diligence, as reflected through the [GNI principles](#) on freedom of expression and privacy, GNI's unique [accountability mechanism](#), and corresponding [Public Assessment Reports](#). Just as importantly, WSIS emphasized that access, inclusion, and rights-based governance are key pillars of development and essential for achieving the Sustainable Development Goals (SDGs). This framing remains urgent and relevant in 2025.

2. What are the most important challenges to the achievement of WSIS outcomes to date and in the future that need to be addressed in the Zero Draft?

Drawing on the Elements Paper, the Zero Draft should address the following:

- **Human Rights-Based Approach:** The Elements Paper lacks strong language on human rights, adopting a weaker framing than found in the Global Digital Compact (GDC). The Zero Draft should make explicit references to the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), and other human rights treaties. Human rights should be addressed both in a standalone section and across all thematic areas (data governance, enabling environment etc).

Given the pivotal role of the private sector in digital infrastructure, development, and achievement of the SDGs, the Zero Draft should make explicit reference to the [United Nations Guiding Principles on Business and Human Rights](#) (UNGPs) and the responsibility of businesses to conduct human rights due diligence and human rights impact assessments.

Just as the GDC recognizes the leadership role of the UN Office of the High Commissioner for Human Rights (OHCHR) in digital governance, the Zero Draft should acknowledge the role of the OHCHR as well as the norm-setting work by the UN Human Rights mechanisms (including the Human Rights Council and Special Procedures) as central to digital governance.

The Elements Paper does not address remedy, an omission that is particularly concerning given growing global concerns over biometric surveillance, algorithmic discrimination, and online harms. The Zero Draft should include references to grievance mechanisms, independent oversight, and corporate responsibility to provide redress—key pillars of the UNGPs and international human rights law.

- **Multistakeholder approaches to Internet governance:** The Zero Draft should reference the original definition of Internet governance as stated in paragraph 34 of the WSIS Tunis Agenda: “A working definition of Internet governance is the development and application by governments, the private sector and civil society, in their respective roles, of shared principles, norms, rules, decision-making procedures, and programmes that shape the evolution and use of the Internet.” It should affirm a multistakeholder approach to Internet governance and recognize all stakeholders including governments, civil society, academia, the private sector, and the technical community. The Zero Draft

should recognize the principles of multistakeholderism as articulated in the [NETMundial+10 São Paulo Guidelines](#).

- **The Internet Governance Forum (IGF):** The Zero Draft should recognize that the mandate of the IGF needs to be renewed and made permanent with adequate and dedicated funding. It should recognize the role and work of the national and regional IGFs and articulate ways to strengthen these forums.
 - **WSIS & GDC:** The Zero Draft should include a clear path forward for how the GDC will be integrated with WSIS. The proposal by Switzerland to develop a joint implementation roadmap and to establish a multistakeholder advisory body to support the United Nations Group on the Information Society in their work to implement the GDC and the WSIS should be supported.
3. **What are the most important priorities for action to achieve the WSIS vision of a 'people-centred, inclusive and development-oriented Information Society' in the future, taking into account emerging trends?**

See priorities outlined in question 2.

4. **What additional themes/issues, if any, should be included in the Elements Paper?**

The Elements Paper and the Zero Draft should include or further address the following as systemic challenges:

- **Emerging technologies:** Risks associated with emerging technologies and systems, particularly Artificial Intelligence (AI), (biometric) surveillance systems, and digital public infrastructure.
- **Platform accountability:** The impact of platform business model, design, and governance, particularly content governance systems, on free expression, media diversity, and democratic participation.
- **Digital repression:** The growing use of digital technologies by States to silence dissent through network shutdowns, spyware, and legal threats.
- **Conflict and digital technologies:** The impact of conflict on human rights and development, along with how they intersect with digital technologies.
- **Shrinking civic space:** The impact that shrinking civic space has on a free, open, secure, and interoperable Internet.

5. **Do you wish to comment on particular themes/issues/paragraphs in the Elements Paper?**

- **Paras 32–34 (Human Rights):** The framing should be strengthened by aligning with the GDC’s phrasing: “in line with international human rights law” and recognition of key international human rights laws and frameworks outlined in question 2. It should also introduce mechanisms for implementation, such as human rights impact assessments, remedy frameworks, and transparency standards.
- **Gender language (Paras 21, 48):** This should reflect inclusive terminology, such as “women, girls, and gender-diverse persons.”
- **Para 47:** *“Information integrity, platform accountability, and the role of content regulation and self-regulation have gained greater resonance since the emergence of generative AI platforms that have increased the capability and reduced the costs of generating realistic content, including disinformation.”* This should recognize the importance of a human rights-based approach to platform accountability and the UNGPs.
- **Para 48:** *“International rights agreements permit restrictions on expression to protect the rights or reputations of others, national security, public order, public health or morals, provided that these are relevant, proportionate and established in law.”* This should acknowledge that any restriction on the right to privacy and freedom of opinion and expression must conform to international human rights law, including the principles of legality, necessity, and proportionality.
- **Para 49:** *“Actions need to be taken against abusive uses of ICTs such as illegal and other acts motivated by racism, racial discrimination, xenophobia, and related intolerance, hatred, violence, all forms of child abuse, and trafficking in, and exploitation of, human beings.’ Other types of content that have raised concerns since WSIS include gender-based violence, defamation, disinformation and the promotion of terrorism.”* This should acknowledge that any action taken against abusive uses of digital technologies must be based on international human rights law, including the principles of legality, necessity, and proportionality.
- **Para 59:** *“The governance of the Internet should be multilateral, transparent and democratic, with the full involvement of governments, the private sector, civil society and international organisations.”* This should affirm that Internet governance should continue to follow the provisions set forth in the outcomes of the summits held in Geneva and Tunis and recognize that the management of the Internet as a global facility includes multilateral, transparent, democratic and multi-stakeholder processes, with the full involvement of Governments, the private sector, civil society, international organizations, technical and academic communities and all other relevant stakeholders in accordance with their respective roles and responsibilities. To guide the values and principles of multistakeholderism, the text should take note of the [NETMundial+10 São Paulo Guidelines](#).
- **Para 62:** *“The mandate of IGF is subject to this review and proposals on the renewal of its mandate will be presented in the zero draft.”* This should highlight the position of civil

society for the Internet Governance Forum (IGF) to be given a permanent mandate, adequate resourcing, and regional and national IGFs strengthened.

- **Para 63:** See the language proposed under question 2.

6. What suggestions do you have to support the development of the WSIS framework (WSIS Action Lines, IGF, WSIS Forum, UNGIS etc.)?

To support the development of the WSIS framework, it will be critical to:

- **Human rights:** International human rights frameworks including the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), the UN Guiding Principles on Business and Human Rights, and other human rights treaties, should guide and be embedded across the WSIS Framework (WSIS Action Lines, IGF, and the WSIS Forum).
- **Coordination:** Coordinate, align, and integrate, where appropriate, with adjacent UN tracks to prevent duplication and enable a more unified global approach, including with the GDC and other relevant processes. The proliferation of digital governance initiatives risks fragmentation and dilutes the influence of WSIS unless coordination is strengthened.
- **Bridge national, regional, and international efforts:** A body of work on the WSIS+20 review process has been carried out at the regional and national levels. To bridge the gap between efforts at the national, regional, and international levels, it will be important for the Zero Draft and the WSIS framework to recognize and build on these efforts. Examples include the [Dar es Salaam Declaration](#) and the [Contonou Declaration in Africa](#), which emerged from processes led by UN Economic Commission of Africa (UNECA). The Declarations highlight relevant priorities for Africa as well as contextualized targets and metrics. The Global Network Initiative and Global Partners Digital have also collaborated with local partners to [conduct research and raise awareness](#) about the WSIS+20 review process in India, Bangladesh, Zambia, South Africa, Ghana, Chile, Colombia, and Brazil.
- **Action Lines:** Adapt WSIS Action Lines to meet national and regional priorities and integrate focus areas in the GDC as relevant. This can include:
 - **Connectivity** with a focus on blended financing mechanisms and accessible and affordable access to data.
 - **Data governance** with a focus on ensuring data governance frameworks are grounded in international human rights standards, empowering the end-user, and further catalyzing the use of data to achieve the SDGs.
 - **Digital public goods and digital public infrastructure (DPI)** with a focus on open data, open standards, and promoting rights-respecting DPI ecosystems.

- **Digital inclusion** with a focus on technology transfer and facilitating North-South and South-South triangular cooperation.
- **Information integrity and disinformation** with a focus on promoting fact-based, timely, targeted, clear, accessible, multi-lingual, and science-based information, including during times of crisis.
- **Artificial Intelligence** with a focus on a human rights-based approach to AI, leveraging AI to achieve the SDGs, and using AI in support of the public interest.
- **Metrics and reporting:** Ensure adequate resourcing, localized metrics, and robust reporting mechanisms for tracking the implementation of WSIS.

7. Do you have any other comments?

The efforts by the Co-facilitators to facilitate multistakeholder participation in the WSIS+20 Review Process are welcome and appreciated. To continue strengthening multistakeholder engagement, we recommend:

- **Consultations with governments and stakeholders:** Future consultations should bring together governments, companies, civil society, the technical community, and academics to foster a collaborative approach.
- **Mechanisms for regional engagement:** Dedicated processes and mechanisms to engage stakeholders at the regional level should be established.
- **Continued implementation of the five-point plan and eight recommendations:** The WSIS+20 review process should continue to implement the recommendations developed by the cross-stakeholder coalition, as articulated in the [five-point plan](#) and [eight](#) recommendations, for an inclusive WSIS+20 review process.
- **Sounding Board:** A dedicated and transparent process/mechanism should be established for stakeholder engagement with the Sounding Board.