



The Minister of Foreign Affairs

CC: The Minister of International Development
 The Minister of International Trade

New Impediments to Counter Foreign Disinformation Online

Summary

The purpose of this memorandum is: (1) to inform you of the new challenges the Department faces in countering foreign state sponsored disinformation online through the use of open source data analytics; (2) to explain the domestic and foreign policy implications for Canada; and (3) to outline the mitigation strategies the Department is exploring.

Canada has led the G7 Rapid Response Mechanism (RRM) to identify and respond to foreign threats to democracy since leaders committed to its creation in 2018. Canada has leveraged its leadership of the G7 RRM to detect and share information about disinformation online among G7 and likeminded partners, including during the COVID-19 pandemic, when disinformation became a top-of-mind issue. To do this, our support unit, which we call RRM Canada, has used open source data analytics.

However, this data analytics capacity has grown increasingly constrained in recent months. The primary reason is a sudden and unforeseen denial of sanctioned access to data generated on social media platforms. By sanctioned access we mean access that has been explicitly granted by social media platforms, usually by allowing third party commercial providers to access the platforms' Application Programming Interface (API). Social media platforms' terms of service and decision-making on access to their APIs are business decisions, which do not have to consider national security or national interest.

Should this denial of access persist, it will inhibit the ability of RRM Canada to provide policy makers with situational awareness and insight about potential foreign interference online pertaining to foreign policy priorities. Our ability to support whole-of-government efforts aimed at safeguarding Canadian elections would correspondingly be limited. Our international reputation as a leader in countering disinformation online would also be eroded.

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 Marta Morgan
 Deputy Minister of Foreign Affairs



Background

Context

1. Canada has led the G7 Rapid Response Mechanism (RRM) to identify and respond to foreign threats to democracy since leaders committed to its creation at Charlevoix in 2018. The G7 RRM was a signal by leading democracies to hostile states that foreign meddling in elections and other democratic processes and institutions is a serious strategic threat that will not be tolerated. Canada has since leveraged its leadership of the G7 RRM to detect and share information about disinformation online across the G7 and likeminded partners. The RRM – a ready-made mechanism to exchange information about and consider responses to foreign interference – proved particularly useful in the context of COVID-19, as foreign malign actors leveraged the pandemic to advance their own geopolitical interests, including in the digital information ecosystem.

Mandate and Methods

2. Canada has a dedicated unit at Global Affairs Canada, RRM Canada, which coordinates the G7 RRM on an ongoing basis. It also supports Canada's whole of government efforts to identify and respond to foreign threats to our democracy, in part through participation in the Security and Intelligence Threats to Elections (SITE) Task Force.
3. To fulfill its mandate, RRM Canada undertakes open source data analytics to identify potential foreign interference online across a range of foreign policy priorities. Recent work includes reporting on information manipulation activities related to COVID-19 and PS752. To do this work, RRM Canada uses commercial and in-house tools to monitor the digital environment for signs of foreign state sponsored information manipulation – largely coordinated and inauthentic activity across social media platforms and web sites. In addition, RRM Canada has been a key driver of experimentation and innovation at the Department, receiving a Deputy Minister's Award for Innovation in 2019.

Challenges

4. **Social media platforms limiting access to data:** RRM Canada's capacity to undertake open source data analytics has been seriously constrained by a sudden and unforeseen denial of sanctioned access to social media data, significantly limiting our ability to assess foreign interference and to experiment and innovate.
5. While RRM Canada analyses open and publicly available data, in order to render the data useful for analytical purposes, RRM Canada must structure it in some way. One way to obtain a large amount of structured data from social media platforms is by accessing the platforms' Application Programming Interface (API). However, social media platforms restrict access to and use of their APIs through their terms of service. In some instances, they allow commercial intermediaries to access their APIs to collect data for commercial or research-related objectives.
6. **Twitter:** RRM Canada accessed Twitter data in the past by purchasing a subscription to a third party commercial provider [REDACTED] has a contract with Twitter, whereby it provides clients, like RRM Canada, with access to structured Twitter data, based on what is called a use case.
7. RRM Canada had access to Twitters' API, [REDACTED] until July 2020, when Twitter informed [REDACTED] that it was refusing RRM Canada's previously approved use case. RRM Canada submitted a revised use case, which Twitter also refused. From discussions with Twitter and [REDACTED] representatives, it became clear in recent days that Twitter no longer intends to provide any governments with access to its API for the purpose of identifying foreign state-sponsored disinformation, limiting this privilege to civil society organizations and academics.
8. [REDACTED]

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10. **Facebook:** RRM Canada similarly lacks sanctioned data access to Facebook. In recent months, RRM Canada had been seeking access to a commercial tool that provides structured Facebook data, called Crowd-Tangle. A few weeks ago, Facebook made an explicit decision to deny RRM Canada access to this tool, citing a policy decision to disallow government access to their API.

11. Both Twitter and Facebook argue that governments like Canada should work with non-government experts, who have access to their APIs, to identify potential foreign state-sponsored disinformation on their platforms. Twitter and Facebook's terms of service and their decision-making on access to their APIs are business decisions, which are not required to weigh national security or national interest considerations. RRM Canada, through its data analysis, has continuously demonstrated over the past year how social media platforms are consistently leveraged for foreign interference activities. Denying sanctioned access to Government of Canada researchers, including the RRM team, undermines Canada's ability to understand, identify and counter malign foreign interference activities online. To overcome this new and unforeseen impediment, RRM Canada will consider a range of mitigation strategies, outlined below.

12. **Adversaries employing evolving tactics:** In addition to a lack of data access, RRM Canada and other researchers doing similar work around the world face increasing difficulty in identifying foreign state-sponsored activity online due to the evolving tactics employed by adversaries to blur the lines between domestic and foreign actors, and between overt and covert messaging. This difficulty is amplified against the backdrop of a pandemic-related infodemic and a multiplication of social media platforms leveraged by adversaries.

Implications

13. The inability to undertake open data analytics has negative implications for the mandate and reputation of RRM Canada. It limits RRM Canada's capacity to identify foreign state-sponsored information manipulation online. The inability to produce reports and assess indicators of foreign interference online risks Canada's reputation as a recognised and respected international leader in countering disinformation, including at the G7, NATO, and other international multi-stakeholder tables. It also limits RRM Canada's ability to support the PCO-led Protecting Democracy 2.0 initiative ahead of the next federal election. Finally, it limits RRM Canada's ability to drive experimentation and innovation at the Department and across the Government of Canada related to the use of open data and related tools.

Mitigation strategies

14. In order to continue to fulfill its mandate, RRM Canada is exploring a series of mitigation strategies. These include elevating engagement with social media platforms, possibly through the G7 and with likeminded, to push for increased transparency that includes mechanisms for data-sharing. RRM Canada will also seek to expand partnerships with civil society partners and scholars to support information and data exchange in real time through funded contracts.
15. RRM Canada is also leveraging some of the remaining tools and methods for data collection and analysis in the RRM toolbox and, in preparation for a possible federal election, developing an in-house web scraping capacity. Web scraping is a technique that allows analysts to extract large amounts of data from social media platforms or web sites saved to a local file or database for analysis without having to use the social media platforms' APIs. It simply automates the access and collection of open and publicly available social media data. Some social media platforms, like Twitter and Facebook, prohibit web scraping in their terms of service. However, some social media platforms, like Reddit, do not have an explicit policy, and still others, like Wikipedia, allow it. It is

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worth noting that web scraping, regardless of such terms of service, is widely understood to be a common practice in Canada and elsewhere.

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17. RRM Canada team members will keep us apprised of their progress in advancing these mitigation strategies and will be available to brief you or your office on the status of this work on request.