

/ Open Letter to Members of the European Parliament  
and Representatives of EU Member States

## Use the DSA to Stop Platforms from Suppressing Public Interest Research

2 September 2021

Dear State Secretary Högberg,

**large platforms continue to suppress public interest research by scientists, civil society watchdogs, and journalists. The heavy-handed actions by Facebook against New York University's Ad Observatory<sup>21</sup> is the latest high-profile example – but it also happens in the EU, as the case of AlgorithmWatch's data donation project shows. It is time for legislators to step up. The DSA is the perfect opportunity to do just that.**

We write to you in the middle of the ongoing legislative procedure on the Digital Services Act (DSA), proposed by the European Commission in December 2020. As **6.126 citizens and researchers**, and **35 civil society and scientific organizations**, we want to draw your attention to the recent **alarming examples of platforms oppressing public interest research about how they influence public debate. We ask you to use the opportunity the DSA offers and stand up to this behaviour.**

Facebook – as one of the largest platforms – has repeatedly restricted researchers' access to data, hindering public interest research not only in the United States but also in Europe: The watchdog organization AlgorithmWatch has recently been forced to shut down its Instagram monitoring project after threats from Facebook to escalate to "more formal engagement".<sup>22</sup> Civil society organizations typically cannot risk going to court against a company valued at one trillion dollars, and Facebook's reaction shows that any organization that attempts to shed light on one of its algorithms is under constant threat of being sued. Facebook clearly misuses its power to quash public interest research and therefore prevents an evidence-based debate about the impact platforms have on democratic processes and fundamental rights.

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<sup>21</sup> <https://techcrunch.com/2021/08/04/facebook-ad-observatory-nyu-researchers>

<sup>22</sup> <https://algorithmwatch.org/en/instagram-research-shut-down-by-facebook>

In your position as representatives of the European citizenry, we ask you **to ensure that Terms of Service cannot be weaponized against individuals or organizations that attempt to hold large platforms to account. Financial power must not be the currency that governs our public sphere.**

Holding platforms accountable requires having insight into relevant information on how they curate content and thereby influence public discourse. One of the key barriers to scrutinizing platforms precisely lies in researchers' lack of access to relevant data. The DSA would overcome this barrier by requiring transparency on advertisement targeting criteria (Article 30), and by giving researchers access to platform data (Article 31). **However, Article 31 should not limit such access to "vetted researchers" with academic affiliations but also explicitly mention other sources of public interest research: civil society organizations and journalists. We strongly urge you to uphold the provisions in the current negotiations of the act and make sure these researchers can continue to fulfil their key watchdog function.**

As AlgorithmWatch's story illustrates, we cannot simply rely on what platforms tell us they do. While the DSA foresees auditing mechanisms by both independent third-party auditors and regulators, it places strong emphasis on companies' own risk-assessments and non-binding codes of conduct. **We ask you to make sure that DSA auditing procedures are more than a box-ticking exercise.**

Large platforms play a crucial role in society, influencing vital interactions from identity-building to voting choices. How they do this is largely unknown. Individuals must be empowered to be more autonomous in their use of social media platforms. Only by working towards more transparency can we ensure, as a society, that there is an evidence-based debate on their impact – which is a necessary step towards holding them accountable. **Only if we understand how our public sphere is influenced by platforms' algorithmic choices can we take measures towards ensuring they do not undermine individuals' autonomy, freedom, and the collective good. We invite you to help us turning the DSA into an effective tool to do just that.**

We thank you for your effort in keeping our public sphere healthy and resilient.

In the name of the **35 organizations** and **6.126 individuals** who signed this letter,

yours sincerely,



Matthias Spielkamp

Co-Founder and Executive Director, AlgorithmWatch

## Signatories:

### Organizations

Access Now  
AI Now Institute  
AlgorithmWatch  
AlgorithmWatch Switzerland  
Dataskydd.net  
Defend Democracy  
Democracy Reporting International  
German Communication Association (DGPUK)  
Digitalcourage e.V.  
Digitale Gesellschaft e.V.  
Digitale Gesellschaft Schweiz  
Državljan D / Citizen D  
epicenter.works  
European Center for Not-for-Profit Law (ECNL)  
European Digital Rights (EDRI)  
European Policy Centre (EPC)  
Gesellschaft für Informatik e.V. (GI)  
Global Witness  
Gong  
HateAid  
Heinrich-Böll-Stiftung e.V.  
Homo Digitalis  
IT-Pol  
Media Monitoring Africa  
Mozilla Foundation  
Open Future Foundation  
Open Society European Policy Institute (OSEPI)  
Panoptikon Foundation  
Peace Institute, Ljubljana, Slovenia  
Privacy Network  
Reporters Without Borders (RSF)  
Swiss Association of Communication and Media Research (SACM)  
stiftung neue verantwortung  
Vrijschrift.org  
Wikimedia Deutschland e.V.

## Individuals

*The letter has been signed by 6.126 individuals, of which 3.888 are listed below.  
2.238 individuals chose to sign the letter anonymously.*

### Initial signatories

Jef Ausloos, Postdoctoral researcher, University of Amsterdam

Marco T. Bastos, Ad Astra Fellow, University College Dublin, School of Information and Communication Studies

Bettina Berendt, Professor, TU Berlin, Weizenbaum Institute, KU Leuven

Alan Borning, Professor Emeritus, Computer Science & Engineering, University of Washington

Axel Bruns, Professor, Queensland University of Technology

Joanna Bryson, Professor of Ethics and Technology, Hertie School

Jean Burgess, Professor, Queensland University of Technology

Claes de Vreese, Distinguished University Professor of AI & Society, University of Amsterdam

Lilian Edwards, Professor of Law, Innovation & Society, Newcastle University

Philip N. Howard, Professor, Director, Programme on Democracy and Technology, Oxford University

Natali Helberger, Professor, Institute for Information Law (IViR), University of Amsterdam

Mireille Hildebrandt, Professor, Co-Director Research Group on Law, Science, Technology & Society, Vrije Universiteit Brussel

Slava Jankin, Professor of Data Science and Public Policy, Director Data Science Lab, Hertie School

Ulrike Klinger, Professor, Chair for Digital Democracy, European New School of Digital Studies, European University Viadrina

Paddy Leerssen, PhD Candidate, Institute for Information Law (IViR), University of Amsterdam

Jan-Hendrik Passoth, Professor, European New School of Digital Studies, European-University Viadrina Frankfurt/Oder

Marietje Schaake, International Policy Director, Cyber Policy Center, Stanford University

Rebekah Tromble, Director of the Institute for Data, Democracy, and Politics, Associate Professor, School of Media and Public Affairs, George Washington University

Aimee van Wynsberghe, Professor, Professor, Director Institute of Science and Ethics, University of Bonn

Jutta Weber, Professor, Department of Media Studies, Paderborn University

Marlena Wisniak, Senior Legal Consultant, European Center for Not-for-Profit Law (ECNL)

## Signed via the call for signatures

Prof. Thomas Gegenhuber	Bruno Otto	Yohko Hatada	Göran Bolin
Torger Irle	Dr. Klaus Dorn	Brunhild Wolf	Robert Lensing
Henry Steinhau	Juergen Volker	Yannis Dilger	Beate Steffens
Daniela von Treuenfels	Tom Lebrun	Gerold Domeyer	Stephan Johann Lehmler
Johannes Filter	Karl-Ludwig von Wendt	Bart Preneel	Dr Elizabeth Vokurka
Patrick Stary	Ester Amaral de Paula Minga	Fabian Pittroff	Robert Reiser
Johannes Breuer	Chris Rees	Thomas Knorr	Mario Sidow
Erwan Le Merrer	Matthias Leimeister	Silvia Ciotti	Philipp Lohner
Wolfgang Pfeifer	Gerald Mäsch	Clara Helming	Uwe Saßmannshausen
Bertram Holtz	Christina Völker	Dr. Michael Hälsig	Klaus Hofmann
Susanne Schwenk	Jörn Eichhorn	Raphaël Velt	Maurice Jones
Horst Kolb	Detlef Witt	Ulrich Höller	Frank Esser
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Damian Paderta	Alexandru Moise	Wendy M. Grossman	Georg Horntrich
Ilja Kobrin	Wolfgang Schneider-Rathert	Monika Viktorova	Marc Faddoul
Toon Lowette	Roland Schulze	Gemma Pörzgen	Christian Höller
Gabriel Grill	PD Dr Jessica Heesen	Felix Haase	Jörg Cassens
Jeanette Hofmann	Markus Zugehör	Prof. Dr. Lars Rinsdorf	Michael Stognienko
Gaëtan Goldberg	Flurin Hess	(President DGPuK)	Florian Winkler
Monika Heim	Kröck Yusuf M.	Rudolf Lachinger	Andre Cramer
Tim Göbel	Philipp Lorenz-Spreen	Laura Schelenz	Jaap Kramer
Indra Spiecer	Martin Ebers	Andreas Opitz	Rene Derkx
Anna Boos	Stephan Lewandowsky	Dr. Audrey Houillon	Ricard Ruiz de Querol
Dominique desdy	Mark Dempsey	Marc Preuss	Birgit Einhoff
Jana Ahrens	Paolo Benanti	Katja Munoz	Dimah Ahmad
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Klaus-Peter Jansen	Karlheinz Pape	Arno Couwenbergh	Wahringer
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Thomas Andersen	Anna-Lena von Hodenberg	John Flys	Andreas Herzog
Thomas Hörner	(CEO HateAid)	Stephan Gut	Dr. Hildegard Scheu
Jonas Radunz	Maximilian Kuhnert	Jovana Jankovic	Marco Baringer
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Claudia Müller-Birn	Deen Freelon	Anda Rozukalne	Gausephl
Tomas Klink	Yadira Sanchez Benitez	Kjell Krona	Johannes Höller
Joerg Mitzlaff	Flávio Rocha de Oliveira	Kristin Wahl	Philipp Julian Hietsch
Karsten Neumann	Michael Becker	Dr. Walter Aigner	Anke Tretter
(Landesbeauftragter für	Nadine Zellmer	Namita Kambli	Christiane Frense-Heck
Datenschutz M-V a.D.)	Christian Polzin	Ronny Schuergler	Mirko Tobias Schäfer
Joerg Hassler	Dennis Scheike	Daniel Eckert	Andreas Reuter
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Michael Gamer	Dr. Susanne Richter	Robin Mansell Professor LSE	Jochen Garcke
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Rahel Lang			

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Florian Baumgartner	Luca Cosimo Bramato	Bruno Walther	Paul Leyland
Jan Grobecker	Andrius Balsevičius	Michaela Haugabook	Ines Ropatz
Andrea Wagner	Sabine Möhler	Christopher Conrad	Sara-lea Small
Lode Van de Velde	Stephan Eichenberg	Zeno Heilmann	Es. Shilo
Hugh Graham White	Pascale Richard	Sebastian Malmberg	Lisa Floetenmeyer
Sabine Becker	Bardh Lipa	Yasmine Daniel	Hans Martin Henschel
Roland Heller	Moritz Herrmann	Hans van Deventer	Christine Eile
Glenis Batley	Peter Mausbach	Jean Detheux	Trish Sheridan
Jane Nedanoski	Martina Pickering	Sabena Peace	Dr. Bert Preiss
Ivan Mircevski	Wendy Baker	Manuel Yasli	Insane Blog
Marcela Garcia Romero	Dale Hambrecht	Marie Bajnoci	Oliver Schubbe
Wiebke Reimann	Kurt Graller	Tradian A Maier	Bente Møller
Jens Bachmann	Paul Dieringer	Vladimir Suchy	Lavinia Uscatescu
D Carr	Wolfgang Killinger	Ante Sunara	Judith Olafsson
Christian Fermüller	Johannes Luber	Tanja Cremer	Christa Jochwed
Noor Janssens	Wolf Lieser	Miguel de Beistegui	Josef Schubert
Yasemin Yilmaz	Jacob Panman	Wiede Friedrich	Sebastian Fischer
Christian Berner	Andrew Higgo	Holger Junge	Hannah Schoch
Sertac Erbay	Tim-Christian Welzel	Ela Galanxhi	Laurent Fournier
Swetlana Torno	Jasmin Kölbl	Zoran Lazarov	Theresa Heger
Reem Hassan	Jan Harrison	Gerhard Wagner	Fynn-Mathis Trautwein
Antonio Zirion	Maria Craigie	Muhammad Nasir	Konstantin Henke
Harry HEINZELMANN	Christian Wegenschimmel	Karel Bastiaansen	Maria Hauser-Clements
Adelheid Kööp	Katrin Wohlgemuth	Heike Medland	Heiko Maedler
David Balogh	Daniela Kehrli	Miriam Hummerjohann	Julia Rahn
Karen Wolf	Matthew Kirschnick	Jan Nederlof	Goudou Hassan
Thoralf Rumswinkel	Karen Peeters	Jaroslav Nagy	André Dubrall
Paolo Liverani	Anja Sonst	Linda Mae Findlay	David Wertheim Aymes
Louis F Feiner	Andrew Rigby	Dieter Nagy	Carolyn Cakir
Thomas Schmidhuber	John Hooker	Andreas Gießmann	Lindsay C F DuGan
Emese boga	Lukas Jost	Fabian Thiele	Michal Holy
Makrina Ruseva	Ina Temblay	Bartosz Nowak	Sten Kuth
Markus Schmidl	Laurin Pircher	Matthias Maximilian Schneider	Benjamin Krüger
Richard Hockaday	Norbert Duerichen	Julia Schloemer	Bemjamin Türk
Michel Santana Rivero	Margo Robinson	Elisabeth Fruehwirth	Leszek Rudloff
Markus Buschmann	Henri KONSTAIN	Elena Sbardellati	Thomas Karlekkoff
Virgil gorcea	Ken Lang	Michael Murray	Karl Schindler
Thomas Angerer	Wilfried Zeckai	Alexander Vuo	Karl Byrne
Jan de Leeuw	Flavio Flajs	Wasif Altaf	Ksenija Petanjek
Corinne Hundleby	Vasileios Grigoriou	Dr. Nikolaus Wirsz	Alma Deutsch
Paul Allard	Philippe BUC	John Heard	Karen Christiansen
Sandra Disteli	Goran Obradovic	Anthony Barley	Edward Puterbaugh
Robin Reinsch	Pilat Herbert	Sergius Seebohm	Dr. Axel Härtl
Gonzalo Barinaga	Sue Robertson Smith	Nina Himmelreich	Barbara Christiane
Brian C Jones	Hasan Kochak	Maxim Dedushkov	Holger Kaßner
Lena Hortl	Olaf Altenwerth	Philipp Elhaus	Ernst Rosenkranz
Andreas Kugel	Jerzy Przychodzeń	Ralf Hartmann	Reinhold Waber

Michael Levy Lawton	Werner Pfrang	Judita Slivnik	Eran Laish
Tomas Deutsch	Janis Beckmann	Joerg Kadner	Emilija Weimann
Rick Maltese	Simona Theoharova	Sophie Lewis	Emiel Roeland Visser
Thomas Meier	Pritam Kumar Sinha	Lisa Jennings	Sabine Walther
Max Eifler	Ken Nicol	Malwina Neumaier	Peer Höcker
Jackie Grad	Conor McAuley	Hans-Juergen Franz	Mark Baker
Charles Soebarta	Stephan Bartl	Isabel Hochbach	David Wythe
Simon Anstey	Shi Blank	David Platt	Leonie Möller
Katharina Lechthaler	Hilde Bschorr	Carol Sawyer	Martin Kirwan
Simon Marcantoni	Christian Rhomberg	Kamiran Al Khadzh Khasan	Brigitte Michiels
Frédéric Sonak	Jan Sturm	Jolanta Dobkowska	Arno Glasmacher
Hub Abresch	Christopher Gammon	Ian Hazlett	Bernd Lamparter
Peter Achilles	Doblender Burkhard	Ivan Bosnjak	N Qualter
Maxim Stuehrenberg	Juliet Kelly	Franz Stieg	Philipp Heuberger
Mandy Westhoff	Sabrina Egolf	Bárbara Trovão Ferreira	Barbara Hrdlickova
Stephan Gschwendtner	Ashtyn Senuta	Leonie Nützel	Alistair Smith
Karel Post Uiterweer	Manon Glockmann	Marko Pajevic	Samuel Binder
Simone Fischer-Hübner	Marcelo Miller	Georgia Blackwell	Christof Senn
Maximilian Riering	Danish Umair Ahmad	Lenka Werdenich	Cornelia Nugteren
Jos BESSEMS	Markus Axel von Hoegen	Jael Veld	Susan Halstead
Professor Jennifer Mindell	Petko Guglev	Gordan Skeledžija	Ulises Cortes
Anita Seeberg	Gamze AVCI	Holger Skidzun	Dr Anne Mc Closkey
Elisa Gruber	Stelios Chadjinicolaou	Philip Horgan	Judith Kofler
Andrea taeggi	Natalie Williams	dejan kršić	Pat langford
Sophia Willner	Keith Emery	Mariusz Stachowicz	Louise McDermott
Phil Soheili	Richard clover	Cristián Fernández Abella	Ingrid Angela Klepzig
Anthony Hampton	Erik Mohácsi	Dorothee Heil	Antonia Ruppel
Immanuel Ulrich	Gudrun Bielz	Michelle Joy Boss	Verena Brand
Dr. Jürg Gassmann	Harald Dieter Wittmer	Friedrich-Wilhelm Nehl	Mike Pollitt
Alenka Nemanič	David Menham	Julie Hansen	Jakob Haufe
James Rapport	Cornelia Reichardt	Markus Lindenmayer	Peter Joseph Promper
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Shelley Salamensky	Rena Seyidova	Margaret Brady	Lisa Finger
Rosie Pagenkemper	Aksel Uhl	Andreas Sommer	Lukas Kelber
Carole Williams	Crispian Villeneuve	Andrea T	Martin Kuhn
Eleanor Kavanagh-Brown	Denis Utochkin	Shiva Grings	Jasmin Heiderich
Steev Lemercier	Eric Anderson	Jakob Schleenvoigt	Petrescu Stefan
Luca Marinucci	Airan Berg	Ania Lipczynska	Lincoln Saugstad
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