Submission to the Meta Oversight Board

Iranian Woman Confronted on Street

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Unveiled Iranian women's content should remain on Meta platforms as its removal could enable the Islamic Republic to suppress women's protests advocating for gender equality, individual autonomy, and freedom of choice in Iran. Additionally, such content has significant evidentiary value in documenting the "Woman, Life, Freedom" protests, promoting accountability, and upholding the principles of transparency and free speech.

I. Protesters and Participants in the "Woman, Life, Freedom" Movement Have Effectively Used Social Media Platforms for Digital Campaigning, with Images of Unveiled Women Playing a Vital Role.

The "Woman, Life, Freedom" movement has been formed around the idea of dismantling oppressive and unjust laws enforced by the Islamic Republic against Iranian women, including mandatory hijab. The Iranian regime has effectively stifled all peaceful forms of protest, leaving Iranian women with few avenues to voice their grievances. The action of removing compulsory hijab in public, carried out by countless Iranian women despite the threat of severe punishment, stands as a courageous declaration of their discontent with mandatory hijab and a resolute demand for their rights and the freedom to make choices in Iran.

The abundance of content featuring unveiled Iranian women posted and circulated on Meta social media networks has provided a platform for protestors and participants in the "Woman, Life, Freedom" movement to highlight the extensive hardships confronting women in Iran. This includes the brutal enforcement of compulsory hijab by the Islamic Republic, which led to the custodial death of Mahsa Jina Amini due to what is referred to as "improper hijab," in addition to hundreds of other civilians who perished during the ensuing protests. Moreover, dozens of Iranian women have utilized Meta platforms to share their personal narratives and perspectives, including those who were arrested or suffered life-altering physical injuries during the protests. Their resilience sends a compelling message of empowerment and serves as a source of inspiration for others confronting similar obstacles.

The utilization of images depicting unveiled Iranian women has played a pivotal role in amplifying their voices, dismantling stereotypes, humanizing their struggles, and offering a more comprehensive understanding of the various perspectives within the "Woman, Life, Freedom" movement. These visuals have reached a global audience and mobilized support for the movement.

II. Removing "Woman, Life, Freedom" Content from Meta Platforms Would Serve to Silence the Voices of Brave Iranian Activists and Remove Evidence Essential to Ensuring Accountability for Violations Against Activists.

Removing content that includes images of unveiled Iranian women would further suppress their voices, as the global audience would be denied the opportunity to witness the challenges faced by these courageous women. With already limited means for activism in Iran, foreclosing online avenues would further limit their freedom of expression, a fundamental human right.

Moreover, removing this online content may allow the Islamic Republic to evade accountability. Digital content showing unveiled protesters and action taken against them by Iranian security forces has high evidentiary value. It can serve as direct evidence of human rights violations,

including identification of those responsible. Removing this content from Meta platforms would make this vital documentation inaccessible to rights organizations advocates and accountability mechanisms. A coalition of organizations, including the signatories of this response, are working to preserve publicly posted digital documentation of protest-related violence in Iran, to analyze its evidentiary value and ensure it can be utilized in future accountability processes. The coalition is actively working to preserve content posted on Meta platforms. Removal of such content, prior to its identification and preservation by external actors, would undermine efforts to ensure accountability for the violations committed against protesters in Iran.

III. The Nature and Gravity of the Risks Associated with Circulating Pictures or Videos on Social Media Showing Unveiled Women in Iran Do Not Justify Their Removal from Meta Platforms.

Empowered by Article 638 of the Islamic Penal Code, the Islamic Republic employs various methods, including advanced technologies and morality police patrols, to identify and apprehend individuals who defy compulsory hijab. Women whose images circulate on Meta platforms without wearing the compulsory hijab may face serious consequences, including fines, imprisonment, or physical punishment.

The Islamic Republic's officials have employed different tactics to trace dissenters and participants in the "Woman, Life, Freedom" movement on social media. These tactics include extensive online surveillance using sophisticated methods, blocking access to social media platforms and encrypted messaging apps, cyber espionage, infiltrating popular social media accounts, deploying online forces known as "soft war officers" to harass dissidents and report on them, disseminating disinformation and propaganda to discredit dissenting movements, and arresting individuals based on their social media posts and online activities. Furthermore, Islamic Republic officials also orchestrate mass reporting campaigns using the user reporting system to pressure social media companies into removing content related to dissidents or placing them into shadow bans, citing safety violations or threats to national security as pretexts.

Despite the risks posed by publication of images identifying unveiled women, removing such content is not the most appropriate course of action for the reasons discussed above. Instead, other measures can be taken to ensure the safety and protection of Iranian women while also upholding freedom of expression and ensuring preservation of evidence. Meta could consider implementing measures or tools aimed at safeguarding the safety and anonymity of these women, such as blurring faces of unveiled women. Any such measures should be taken in consultation with Iranian women and civil society, as discussed below.

Furthermore, Meta should establish clear guidelines for distinguishing content intended to raise awareness and advocate for women's rights in Iran from other content that might raise valid privacy concerns. Achieving this would require a deeper understanding of the political context and dynamics in Iran. Meta needs to align its content moderation policies with international human rights standards—in particular freedom of expression, evidence preservation, and the right to privacy—and consider the unique challenges faced by users in Iran.

IV. Meta's Content Moderation Policies for Persian-language Expression Related to the Political Situation in Iran Must Strike a Delicate Balance Among Safeguarding Freedom of Expression, Preserving Content with Evidentiary Value, and Protecting Users from Harm.

Meta's content moderation policies concerning Persian-language expression in the context of Iran's political situation should strike a delicate balance between safeguarding freedom of expression, preserving content with evidentiary value, and protecting users from harm. This approach necessitates alignment with international human rights standards and a nuanced understanding of Iran's unique political landscape. It is also essential that any approach be adaptable to the ever-changing political dynamics to maintain a contextual understanding.

Any policies adopted by Meta that are specific to content moderation in Iran should be developed in consultation with the Iranian user community, local experts, and human rights organizations.

Users should also have access to transparent guidelines that distinctly outline what constitutes acceptable and prohibited content. Additionally, there should be a robust and transparent content appeals process in place to promptly address user concerns.

Considering the grim human rights record of the Islamic Republic, Meta must prioritize the safety and privacy of users engaged in political activity. This commitment involves establishing effective mechanisms for users to report instances of harassment, intimidation, or threats. Lastly, Meta should employ strategies to detect and mitigate the dissemination of disinformation and propaganda related to Iran's political situation.

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