



Project Title: Freedom of Expression's New Gatekeepers: Applying Human Rights Standards to Private Online Intermediaries

Grant No: 107718-00020399-008

Research Organisation: Centre for Law and Democracy

Location of Study: Global, based in Halifax, Nova Scotia

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Report Type: Final Technical Report

Date Submitted: 31 July 2016

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Executive Summary

This Report is the final report for the IDRC funded project: “Freedom of Expression’s New Gatekeepers: Applying Human Rights Standards to Private Online Intermediaries”. This project ran from January 2015 to July 2016. It was led by the Centre for Law and Democracy (CLD) and carried out in collaboration with the Arabic Network for Human Rights Information (ANHRI) (Egypt), the Centre for Internet and Society (CIS) (India), the Centro de Estudios en Libertad de Expresión y Acceso a la Información (CELE) (Argentina), Open Net Korea, Tamir Israel of the Canadian Internet Policy and Public Interest Clinic (CIPPIC) at the University of Ottawa and Christopher Parsons of Citizen Lab at the University of Toronto.

The purpose of the project was to explore how private sector online intermediaries (intermediaries) can operate in a manner that more fully respects and promotes human rights, in particular the right to freedom of expression, to develop clear recommendations and standards for this, and to promote policy and practice change among intermediaries in line with those standards. The project also sought, as parallel objectives, to strengthen research ties between Canadian and international institutions, and to set the stage for further research collaborations.

The main output for this project is a major research product – “Stand Up for Digital Rights: Recommendations for Responsible Tech” – the main Report for which is attached as Annex 1. The Report includes contributions from each research partner and was published in print as well as online on a dedicated website: www.responsible-tech.org. An Executive Summary was produced in English and translated into Arabic, French and Spanish, attached as Annexes 2-5. The Report also includes a set of Recommendations, which were published separately and translated into Arabic, French, Korean and Spanish, attached as Annexes 6-10. Regional or country reports, looking at two or three key issues, were produced by partners based in Argentina, Canada, Egypt, India and South Korea, and are attached as Annexes 11-15. We also adapted the research for publication in an academic journal. This article, which is currently under consideration, is attached as Annex 16.

In addition to the dedicated website, the project outputs were promoted through a series of launches and events, starting at RightsCon on 30 March 2016, where an early draft was presented for comment. The full product was launched at an event at the University of Ottawa on 15 June, with a parallel event taking place simultaneously in Buenos Aires. A subsequent event was held in Taipei on 28 July. Each of these events included significant representation from the private sector, along with participants from government, civil society and academia.

Although the project faced some early challenges, including having to replace two of our initial partners, it was a major success insofar as it advanced discussion of this crucial issue, generated a high quality research product which has been extremely well received, and has had some success in terms of impacting on intermediaries’

policies on these issues. Particularly notable has been its positive reception among leading global stakeholders, including the project's Advisory Panel, which comprises high-level representatives from the private sector and civil society, as well as the United Nations Special Rapporteur on Freedom of Opinion and Expression. A list of Advisory Panel members is attached as Annex 17. We received significant positive feedback during a series of meetings with targeted intermediaries in late July, including specific commitments to review and improve particular policies and practices based on our Recommendations. We have also lined up significant future research collaborations based on the work, both in the form of research proposals which will be submitted over the coming months and as a result of direct requests by our partners and collaborators for assistance with future projects or to feed their work into ours.

The Research Problem

The proposal for this project noted that the central role intermediaries play in facilitating online speech was an emerging challenge in the battle to safeguard human rights on the Internet. It noted the novelty of applying international human rights rules in this context, given that human rights primarily bind States rather than private actors, that the conceptual framework for the human rights responsibilities of private sector companies is only starting to be developed, and that relatively little research has been done so far on the human rights responsibilities of intermediaries, despite the obvious impact they have on rights.

Our original objectives in carrying out this project were to provide insight into this emerging challenge, to raise awareness of the human rights implications of private sector conduct and to provide guidance for how these human rights challenges should be understood and addressed. Since the project began, global awareness of this issue has advanced significantly, particularly around the role that major intermediaries play in moderating and managing global conversations. Although some increase in awareness was inevitable, as increasing numbers of people realised the power that these intermediaries wield, we can claim some credit for pushing this conversation forward, and for shepherding high-level discussion towards the practical implications of this realisation. As a result of this global advancement in understanding, we were able to focus our work more precisely on specific policy recommendations, providing clearer guidance than can be found in parallel initiatives.

Our own understanding of the research problem has also evolved, partly due to these contextual changes and partly as a result of the project itself, since our collaborations with research partners offered valuable mutual learning opportunities, given the differences in how these problems are manifested in different countries and regions of the world. The fact that we were able to distil

these varied perspectives and experiences into a commonly embraced set of Recommendations, that are globally applicable, is a significant achievement.

Progress towards milestones

The grant agreement lists the following milestones (listed in Part 3 of the Grant Agreement):

1. Commencement
This project commenced on 5 January 2015.
2. Initial Payment
Initial payment was received in January 2016.
3. Final Technical Report
CLD's Final Technical Report is provided here.
4. Final Financial Report
CLD's Final Financial Report is scheduled to be provided by 31 August 2016.
5. Final Payment
CLD's Final Payment is set to be received after the Financial Report is approved.

Synthesis of research results and development outcomes

- **Objective 1: To consolidate international opinion around better practice standards governing the policies and practices of online intermediaries.**

The issue of the human rights responsibilities of online intermediaries remains an emergent human rights question, and a highly controversial one at that, so that it would be premature to say that international opinion has fully consolidated on this issue. At the same time, the project made a significant contribution to establishing better practice standards by developing and circulating a comprehensive set of Recommendations.

The main body of the research, which builds on a robust background discussion on the applicability of human rights responsibilities to the private sector, is divided thematically into six sections. The first, on expanding access, looks at ways of reducing the economic, social and infrastructural challenges which inhibit truly universal access to the Internet. It is primarily targeted towards Internet service providers and includes specific recommendations for programmes to expand access

for disadvantaged groups, such as by reducing or eliminating price differentials between urban and rural users.

The second section, on net neutrality, calls on all intermediaries to support and promote this principle. The Recommendations are particularly significant in the stance they take towards zero rating programmes, which provide free access to certain select applications or services. This is among the most hotly debated digital rights questions. Ultimately, the Recommendations do not rule out zero rating entirely as a scheme to promote Internet access but they place the onus on those promoting or providing these schemes to demonstrate that they are more effective than parallel on-ramp initiatives which respect net neutrality.

The third section, on moderating content, emphasises the need for clarity and transparency in systems to develop and enforce standards developed by intermediaries for their own platforms. It also provides concrete procedural recommendations, for example to notify users early on when their information is subject to a complaint, to offer robust appeals options and to ensure that users can export material which is subject to removal.

The fourth section, on privacy, sets out clear standards for the collection and handling of user information, including to minimise the amount of information collected, to ensure that it is encrypted and to notify users promptly in the event of a security breach. The Recommendations also provide procedural guidance on how to implement the “right to be forgotten”, another highly contentious digital rights issue.

The fifth section, on transparency and informed consent, develops standards for transparency reporting among intermediaries and on how to craft terms of service in a clear, concise and accessible manner. We anticipate that this will be a particularly important area of engagement as a growing number of companies are publishing transparency reports. The sixth section, on responding to State attacks on freedom of expression, discusses how intermediaries should react to abusive demands by States. Among other things, the recommendations here offer specific guidance on how to mitigate responsibility for human rights abuses and on when to consider divestment as an alternative to complying with State demands.

The Report and Recommendations provide a significantly more detailed vision than has been found elsewhere, and we believe that this is having an impact on global opinions. For example, in July 2016, the Ranking Digital Rights Corporate Accountability Index unveiled a set of proposed revisions to its methodology, including several which closely correlated to our Recommendations, such as adding an element evaluating how companies work proactively to identify content or accounts that violate their terms of service. Rebecca MacKinnon, the Ranking Digital Rights project’s Director, is on our Advisory Panel. We have also had conversations with Judith Lichtenberg, the Executive Director of the GNI, about the Initiative’s work and mandate.

More broadly, the fact that our Recommendations have been endorsed by all of our research partners, and were very favourably received by our Advisory Panel, also suggests that they will be influential in shaping global opinion going forward, given the diversity of opinions represented and the senior status of the participants.

- **Objective 2: To impact directly on the policies of Internet intermediaries to improve human rights on the Internet.**

We understood, from the outset, that this would be a difficult objective to achieve in the immediate term. However, we are pleased to report some significant inroads here.

A key avenue for direct engagement was through a series of meetings that took place in San Francisco in late July. We arranged to give presentations to three major intermediaries – namely PayPal, Mozilla and AirBNB – at their offices. In advance of these meetings, we reviewed the policies of each intermediary, in order to provide suggestions for specific policy improvements based on our recommendations. In all three cases, our recommendations were well received and the intermediaries committed to incorporate discussions about our input into upcoming policy reviews, with one going as far as to say that a major, and highly controversial, recent policy decision would not have taken place in light of these considerations. Each intermediary also requested a more detailed, written assessment of areas for improvement, which we committed to provide in early August. We view these commitments and requests to be part of an ongoing dialogue on improving practice which will continue beyond this project's completion.

We are also engaging with TekSavvy, a Canadian ISP, which is keen to improve its current policies. After an initial conversation on the sidelines of RightsCon in March 2016 about improvements in how they communicate with users, a TekSavvy representative agreed to speak at our main launch event on June 15. At that time, she mentioned that they were reviewing their policies so as to determine how they could be brought into line with our Recommendations. We are currently following up with TekSavvy to assess the proposed changes.

We also continue to engage with Facebook, particularly with regards to their policies in Myanmar, a country where CLD has a particularly strong presence.

- **Objective 3: To foster a better understanding within both Canada's and the international legal and academic communities of the challenges and choices intermediaries face.**

As noted in the section on The Research Problem, understanding of this issue has advanced significantly over the course of the project, partly as a result of our research and outreach. Both CLD and its research partners distributed electronic

and paper copies of the research widely to stakeholders around Canada and internationally, and engaged in robust consultations on how the research could be improved. While it is difficult to objectively assess levels of understanding, we received excellent feedback on our work from the academic and legal communities. In particular, our engagement with the Advisory Panel resulted in a robust dialogue on critical human rights issues. In addition to feeding into our own research, this process enhanced awareness and understanding about these issues among our Advisory Panel members. For example, David Kaye, the UN Special Rapporteur on the Right to Freedom of Opinion and Expression, has been increasingly engaged on intermediaries and freedom of expression, including devoting his 2016 Report to this subject.

In addition to these written consultations, our launch events and promotional events all featured strong attendance and robust discussions, as noted below:

Event	Date	Participants
RightsCon, San Francisco, USA	30 March 2016	86
Canadian Launch, University of Ottawa, Canada	15 June 2016	24
South American Launch, University of Palermo, Buenos Aires, Argentina	15 June 2016	50
Asia Pacific Regional Internet Governance Forum, Taipei, Taiwan	28 July 2016	45
TOTAL ATTENDEES:		205

The diversity of these events is particularly noteworthy, as they took place in four different countries, and were hosted by a wide range of different organisations.

Importantly, the project has resulted in a significant boost to our partners' understanding and engagement on this issue. Although they were already strongly familiar with digital rights, the cutting edge nature of the research meant that the project broke new conceptual ground for their researchers. In addition, CLD's rigorous research standards, and the collaborative nature of the work, provided a significant capacity boost, particularly to our partners in the global south.

- **Objective 4: To serve as a basis for further research and dialogue around key digital rights issues.**

We have planned significant follow up activities for this research and received several invitations for further engagement. For example, we have been invited to present the Recommendations at IGF 2016, as part of the Dynamic Coalition on Platform Responsibility, which is set to include work on drafting model contractual clauses for particular types of intermediaries. Our research for this project will also support CLD's coming engagement with the special international mandates on freedom of expression. Every year, the four special mandates, from the United

Nations, the Organisation of American States, the Organisation for Security and Co-operation in Europe and the African Commission, issue a Joint Declaration, which CLD leads on drafting. There is some suggestion that next year's Joint Declaration should focus on the human rights responsibilities of private sector online intermediaries.

Another major avenue for further engagement will be to work with specific intermediaries to develop concrete proposals for better practice based on our Recommendations. Our partners have expressed a strong interest in taking this forward. Particularly notable is the case of the Centre for Internet and Society, which is planning to incorporate discussion of the Recommendations into a major event on data control which is scheduled to take place in the autumn. We are also planning to initiate a new project to assess how selected Canadian intermediaries should improve their policies based on our Recommendations, which we are currently seeking funding for, potentially with our collaborators at Citizen Lab.

We have also reached out to the Canadian Civil Liberties Association, and are currently discussing a research collaboration that will look more specifically at digital privacy and surveillance, specifically with regard to third-party data brokers, an area which is related to the focus of the intermediaries project.

- **Objective 5: To engage law students, the academic world more broadly and research-oriented civil society organisations within Canada and internationally in a discussion about this subject.**

This is closely related to Objective 3. However, with regard to law students specifically, it is worth noting that CLD alone had 15 law students contributing to the project, 11 of whom are listed as researchers on the project's "Acknowledgements" page. Our research partners, particularly those based at academic institutions, also brought student research into the project.

Our promotional events provided additional outreach to the academic world. The launches on June 15 were held in academic settings, at the University of Ottawa and the University of Palermo, and attracted strong attendance from academics and students. The Centre for Internet and Society has also scheduled a lecture on this subject to take place at the National Law School of India University.

In addition to those who directly attended our events, our project has been widely distributed through both CLD's website and through the dedicated Responsible Tech website. We specifically sent out research results to contacts at the Catholic University of America, Columbia University, Emory University, Dalhousie University, George Washington University, Georgetown University, Harvard University, the International Islamic University of Islamabad, Jindal Global University, Rutgers University, Tsinghua University, the University of Oregon, the University of Ottawa, the University of Queensland, the University of Tasmania and Yale University, as well as to dozens of other civil society colleagues and research groups.

In order to further engage the academic world, we have prepared an academic article based on the research which has been submitted to the Harvard Journal of Law & Technology for consideration for their upcoming issue (Spring 2017). If the piece is rejected for publication there, it will be submitted elsewhere.

- **Objective 6: To advance understanding of human rights more broadly on the Internet, including promoting the right to public participation, the right to education and gender and social equity.**

This is closely related to Objectives 1 and 3, since a broader understanding of the Internet's role as an expressive medium is linked to its potential to deliver these ancillary benefits. Our launch events and presentations always included an important focus on the wider rights implications of the behaviour of intermediaries, including discussions which inevitably evolved beyond just talking about freedom of expression to consider the full range of benefits that Internet access delivers.

Our engagement with PayPal specifically targeted the right to public participation, since they operate on the cutting edge of one of the main modern threats to the right to association, namely efforts by some States to restrict NGOs' ability to access funding from abroad. Our dialogue with PayPal has succeeded in significantly advancing their understanding of the human rights impact of their policies. Based on the substance of our conversations, we hope that human rights considerations will be entrenched more formally into their decision making processes going forward, particularly through the institution of routine human rights impact assessments, which they specifically requested our guidance in setting up.

Issues of gender and social equity were central to our dialogue with AirBNB, since they are currently considering instituting a policy prohibiting discriminatory renting practices among their users. This engages significantly with aspects of our Recommendations, notably around content moderation and transparency, and we provided guidance for optimal ways to promote inclusiveness among their users while respecting their expressive and privacy rights.

More broadly, while our research focused primary on freedom of expression, there is a significant nexus between this work and the right to privacy, which became a central part of our Recommendations. Issues of gender and social equity are also highly relevant to campaigns to combat cyber harassment, another core area of focus of the project.

Methodology

The project began with a conversation among the project partners, which took place in February 2015. The conversation involved staff from all of the original partners: CLD, CELE, CIS, ANHRI, the European Digital Rights Initiative (EDRi) and Chidi

Oguamanam, at the University of Ottawa. The objective was to introduce the partners to one another, to provide an overview of the project and the partners' responsibilities, and to consolidate all of the partners around shared view of the project. It was decided that each project partner would produce a regional case study focusing on two or three major digital rights issues, and how intermediaries' conduct impacts on them. These case studies would feed into the main research Report. During the meeting, we also established an agreed outline for the project, including a rough timeframe for delivery of major outputs. However, although the initial discussion was generally productive and positive, it exposed significant divisions between EDRi and the rest of the partners around avenues for promoting responsible practice among intermediaries. Ultimately, and after further discussions with EDRi, we decided that it would be best to replace them. We considered several candidates, before finally deciding on Open Net Korea.

In the aftermath of the call, CLD developed and circulated a proposed project methodology, including a detailed list of partner responsibilities, and a letter of introduction which the project partners could use to approach intermediaries for early-stage engagement. These are attached as Annexes 18 and 19, respectively.

Following this call, project partners began their research, starting with the development of an outline for their case studies, focusing on the major themes that each would explore. At this point, it became clear that there were issues with Chidi Oguamanam's role in the project as well, as he expressed some unease with the challenges of drafting a case study on Africa without a budget to travel there himself. Ultimately, since we did not have the funds for a trip to Africa, we decided to replace him with two excellent researchers, Tamir Israel of the Canadian Internet Policy and Public Interest Clinic at the University of Ottawa and Christopher Parsons of Citizen Lab at the University of Toronto.

We had some difficulty engaging with intermediaries in the early stages of the project, partly due to the novelty of this research area, which meant that they may not have felt a natural inclination to subject their policies to potential criticism. Nonetheless, we were able to secure early participation of a few stakeholders, notably TekSavvy, a Canadian Internet-service provider.

As the research moved forward, each of the research partners circulated an outline of their case studies for comment, and CLD developed an outline of the full research product. Following that, the research partners submitted a first draft of their case studies, which each then revised according to feedback from the rest of the team. Although our initial plan had been to include the partner drafts in full within the main Report, nearly all of the partners produced far more detailed research products than we had expected. CELE's contribution, for example, totalled 44 pages. While this level of enthusiasm is a positive sign of strong engagement with the topic, to keep the main Report to a manageable length, we decided to include selected excerpts from each contribution in the main product and to publish the full partner drafts alongside the main report on the project website.

As a draft of the final report neared completion, we began reaching out to prospective members of the Advisory Panel. This effort was highly successful, and we assembled a team of leading experts from around the world, including David Kaye, the UN Special Rapporteur on the Right to Freedom of Opinion and Expression, representatives from Google, Facebook, AirBNB and Mozilla, and representatives of leading civil society groups working in this area from around the world. The Advisory Panel members provided extensive feedback on our work and many remained closely engaged with the project through to its conclusion.

Once a revised draft had been completed, we considered our options for launching the product. Unfortunately, the project's late start meant that our original plan to present the work at the 2015 Internet Governance Forum was not practical, as the submissions deadline for panels was in March 2015, before we had developed proper research conclusions or cultivated strong relationships with intermediaries who could serve as panellists. Instead, we decided to do a first launch of the work at RightsCon, which took place in San Francisco in late March 2016. Our panel for the event was composed of David Kaye, Elonnai Hickok of CIS, Agustina Del Campo of CELE, Christopher Parsons of Citizen Lab and K.S. Park of Open Net Korea and was moderated by Michael Karanicolas of CLD. The panel attracted 86 attendees, making it the most popular session in its timeslot by a wide margin. An attendance sheet is attached as Annex 20. It was also live streamed and featured a Q&A session with remote participants from around the world. On the sidelines of RightsCon, we were able to arrange meetings with several important stakeholders to discuss the work, including meetings with representatives of Yahoo!, Facebook, TekSavvy and the Global Network Initiative.

In the aftermath of RightsCon, we amended the Report and drafted an Executive Summary. We also translated the Recommendations into Arabic, French, Korean and Spanish, and the Executive Summary into Spanish, French and Arabic, and we developed a website to showcase the work online, at <https://www.responsible-tech.org>. The Report was also formatted into a physical book, which we printed for distribution. We also printed copies of the Recommendations as a standalone document.

Our final products were unveiled at a launch which took place on 15 June at the University of Ottawa, in a session that featured speakers from the University of Ottawa, CELE, CLD, Open Net Korea and TekSavvy. A poster advertising the event is attached as Annex 21. The launch was attended by roughly 25 people, including professors, law students, and representatives from government and the private sector. A photo from the event is attached as Annex 22. In the aftermath of the launch event a CLD representative went to Toronto to meet with the Canadian Civil Liberties Association to discuss further collaborative research on this issue.

In parallel to the launch event in Ottawa, a satellite launch took place in Buenos Aires, Argentina, hosted by CELE, which included around 50 participants from civil

society, academia, government and the private sector. A photo from that event is attached at Annex 23. We discussed the possibility of holding a parallel launch event in Cairo with ANHRI, however it was ultimately determined that the deteriorating environment for civil society in that country meant that this would not be possible. The Centre for Internet and Society asked to delay their launch to the autumn, indicating that they would cover the full costs of the event themselves, without use of project resources.

Subsequent to the launch events, Open Net Korea hosted a workshop to discuss the recommendations at the Asia Pacific Regional Internet Governance Forum (APrIGF) in Taipei. The workshop speakers included Peng Hwa Ang, a member of the project's Advisory Panel, along with representatives from the Electronic Frontier Foundation, Digital Asia Hub, Google, Facebook and the Centre for Communication Governance (CCG) at the National Law University, Delhi. The workshop was among the best attended sessions at APrIGF and generated robust discussions between civil society representatives, academics and representatives of the intermediaries. A photo from the event is attached as Annex 24.

After the launch events, we continued our efforts to raise awareness about the work and the importance of this issue, and to reach out to stakeholders, particularly in the private sector, to discuss how to promote better practice. The main aspect of this work was a second trip to San Francisco, where we arranged meetings with Mozilla, AirBNB and PayPal to present targeted recommendations for reforming their policies and practices, which were well received. We also arranged meetings with the Electronic Frontier Foundation and Human Rights Watch to discuss further engagement on this issue.

In addition to our continuing outreach with civil society and the private sector, we visited Global Affairs Canada to present our work to their Corporate Social Responsibility (CSR) Unit. In particular, we discussed expanding the CSR Unit's work to consider the human rights implications of conduct by Canadian tech companies. These talks remain ongoing, and the CSR Unit has expressed a strong interest in incorporating more work with the ICT sector into their programme.

Project outputs

Our research outputs are as follows:

1. Main Report: Stand Up for Digital Rights: Recommendations for Responsible Tech
2. Executive Summary of the Main Report (in English and also Arabic, French and Spanish)
3. Recommendations for the Main Report (published separately and available in English and also Arabic, French, Korean and Spanish)
4. ANHRI Case Study on Intermediaries

5. CELE Case Study on Intermediaries
6. CIS Case Study on Intermediaries
7. Open Net Korea Case Study on Intermediaries
8. Tamir Israel and Christopher Parsons Case Study on Intermediaries

All of these products are distributed under a Creative Commons licence which allows for free re-use for non-commercial purposes, so long as credit is ascribed and any derivative works are distributed under an identical licence. To further enhance accessibility, the Executive Summary was translated into Arabic, French and Spanish, and the Recommendations were translated into Arabic, French, Korean and Spanish. In addition to its availability as an e-book, we have printed copies of the main report as a physical book, as well as physical copies of the Recommendations, both of which will be distributed free of charge.

In addition to these research outputs, our project had the following promotional outputs:

1. RightsCon Session: Beyond CSR: Promoting Strong Human Rights Performance in the Private Sector
2. Website: www.responsible-tech.org
3. Ottawa Launch Event
4. Buenos Aires Launch Event
5. APriGF Session: Recommendations for Responsible Tech: Digital Rights and Private Sector Internet Intermediaries

The Ottawa and Buenos Aires events were all free of charge and open to the public, while the RightsCon and APriGF sessions were open to all attendees of these conferences.

Problems and challenges

One challenge which the project faced was the need to replace two of our research partners, EDRI and Chidi Oguamanam. The decision to replace EDRI came early in the project, when it became apparent that the organisation's recent interactions with private sector intermediaries had left them feeling pessimistic about engaging with the latter to promote human rights, an attitude which was incompatible with our broader project goals. We considered several possibilities for replacing EDRI, mindful of a need to maintain strong regional and thematic diversity among partners and to find a collaborator with a strong track record of research and advocacy on digital rights. We ultimately decided to bring in Open Net Korea because of their excellent reputation as researchers, because we did not have a partner from East Asia and because South Korea presented an extremely interesting case study, due to the country's lack of intermediary liability protections. In order to compensate for having lost EDRI's regional perspective, we engaged five interns

from Europe over the course of the project: two from France, two from Italy and one from Belgium.

Our decision to replace Chidi Oguamanam also came relatively early in the project, as he began to express discomfort with his role in drafting a paper focusing on the African regional context without a budget to travel there. This presented a more significant challenge because the project's structure required a Canadian research collaborator, meaning that we could not replace Mr. Oguamanam with a researcher based in Africa. Ultimately, we decided to replace Mr. Oguamanam with research partners who, rather than a regional context, would offer a depth of research experience in specific issues: Christopher Parsons, who is among Canada's leading experts in digital surveillance, and Tamir Israel, who could offer a valuable perspective into efforts to expand access. In order to fill the regional gap left by Mr. Oguamanam, we recruited an intern from Uganda to help provide that perspective, and also relied on two members of our Advisory Panel, Grace Githaiga of Kenya and Anriette Esterhuysen of South Africa, to provide feedback on our work.

A broader challenge was difficulty engaging with intermediaries. This was something that we had anticipated from the beginning, partly due to the almost inherently critical nature of the exercise we were engaging in and its relative novelty. As a consequence, we had considerable difficulties making inroads in this area at the outset of the project. However, as the research moved forward, and a robust research product began to develop, we found that intermediaries became increasingly responsive and interested in engaging, a fact which is reflected in the strong representation of intermediaries on our Advisory Panel and in the positive reception we received in San Francisco. Indeed, we count this as one of the significant successes of the project.

A final challenge we faced was the political situation in Egypt, where increased pressure on NGOs meant that we were unable to schedule a Cairo launch of the product. This was unfortunate, but out of our control, and is always a risk when contracting with partners in volatile regions. However, we were able to redirect that budget towards a more ambitious launch of the product by Open Net Korea at the Asia Pacific Regional Internet Governance Forum.

Administrative reflections and recommendations

Although we were satisfied with our interactions with IDRC, and consider this project to be highly successful, one potential area of improvement could be the speed at which applications are processed. We submitted our application in March 2014, with an anticipated start date of November 2014, but the contract was not sent to us until 5 January 2015 and the initial funds were only received shortly after that. As a consequence, our research was not sufficiently advanced for us to make a strong submission to present at IGF 2015, since the deadline for panels was in

March 2015. We presume that there are other cases where research work, often by definition cutting edge, might be negatively impacted by slow proposal processing.