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Healthy Conversations?

Selected Trends in Covid-19-Related (Dis)Information Governance on Platforms

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Introduction

While the Covid-19 pandemic has forced schools, many jobs and most social interactions to go online, the transformative power of online communication is not a new phenomenon. Already in 2015, the European Court of Human Rights (ECtHR) noted that the Internet "has now become one of the principal means by which individuals exercise their right to freedom to receive and impart information and ideas, providing [...] essential tools for participation in activities and discussions concerning political issues and issues of general interest."[1] A lot of this communication takes place in online settings that are ruled and regulated by private companies.

These rules are increasingly sophisticated but continue to be criticized widely for the opacity of their development, the arbitrariness of their application, and the non-plausibility of their execution. The general commitment of private actors to the Ruggie Principles as a "social license to operate"[2] often ends when economic questions become dominant. It is therefore essential to underline states' primary obligation to respect, protect and ensure human rights

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[1] ECtHR, Cengiz and Others v. Turkey, 2015.

[2] Human Rights Council, Protect, Respect and Remedy: a Framework for Business and Human Right. Report of the Special Representative of the Secretary-General on the issue of human rights and transnational corporations and other business enterprises, John Ruggie. A/HRC/8/5, 7 April 2008.

on and vis-à-vis private platforms,[3] coupled with a secondary obligation of companies to apply local law in light of international human rights standards.[4] As one of us put it:

> States have a duty to protect their citizens with regard to the internet (and regarding their online activities, including the exercise of freedom of expression). Companies, too, have a corporate social responsibility to respect human rights within their sphere of influence, which – on the internet – is growing rapidly as the majority of relevant communicative acts take place in private spaces. The special role of intermediaries is another challenge for regulating the internet. As the majority of online spaces lie in private hands, it is private law that prima facie frames many norm conflicts online. When states react belatedly through laws or judgments, these may lead to overblocking or legal conflicts between competing jurisdictions. This is why states, offline just as online, have both the negative obligation to refrain from violating the right to freedom of expression and other human rights in the digital environment, and the positive obligation to protect human rights and create an enabling and safe environment for everyone. Due to the horizontal effects of human rights, the positive obligation to protect includes a duty for states to protect individuals from the actions of private parties by making intermediaries comply with relevant legal and regulatory frameworks.[5]

This duty to protect becomes especially important in pandemic times. The possible effects of health-related disinformation in a global health emergency, but also the effects of measures taken to tackle such disinformation are raising the stakes in the ongoing, and largely open-ended, discussion. How and by whom should rules for online communication be formulated and enforced?

The study

How can we as researchers navigate the plethora of platforms, governance approaches, disinformation narratives and the respective societal contexts in such a volatile situation? We are convinced that this can only be achieved through collective scientific action. This study may therefore function as a proof of concept.

This study explores the spread of disinformation relating to the Covid-19 pandemic on the Internet, dubbed by some as the pandemic's accompanying "infodemic," and the societal reactions to this development across different countries and platforms. Its focus is on the role of states and platforms in combatting online disinformation.

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[3] Art. 19 ICCPR, Art. 19 UDHR, Art. 10 ECHR, Art. 9 ACHR (Banjul Charter) and Art. 13 IACHR. See also Ingolf Pernice, Ó"Vom Völkerrecht des Netzes zur Verfassung des Internets – Privacy und Digitale Sicherheit im Zeichen eines schrittweisen Paradigmenwechsels", HIIG Discussion Paper Series No. 2017-02, 10 et seq.

[4] Recommendation CM/Rec(2018)2 of the Committee of Ministers to member states on the roles and responsibilities of internet intermediaries, adopted by the Committee of Ministers on 7 March 2018.

[5] Wolfgang Benedek and Matthias C. Kettemann, Freedom of Expression and the Internet, 2nd edition, (Strasbourg: Council of Europe, 2020).

Through synthesizing answers to twelve questions submitted by more than 40 researchers about 20 countries within the GDHR Network, this exploratory study provides a first overview of how states and platforms have dealt with Corona-related disinformation. This can also provide incentives for further rigorous studies of disinformation governance standards and their impact across different socio-cultural environments.

The individual submissions within this study are not intended to function as stand-alone, comprehensive assessments of the respective country. Rather, they function as pixels that collectively constitute a picture of the Covid-19 disinformation landscape.[6]

The results

The initial situation in terms of the popularity of digital platforms in the surveyed countries offers a largely homogenous picture: in almost all responses, Facebook and YouTube belong to the top five, accompanied mostly by Instagram and Twitter and sometimes by Pinterest and LinkedIn. The search engine Google and the messaging service WhatsApp are mentioned less often, but if so, they rank first or second on the list of platforms.[7] This finding most likely hints at different definitions of the term "platform," which in some instances appears to refer to social media services, while in other cases content intermediaries like Google and messaging services like WhatsApp are included as well. For supposedly similar reasons, popular national and regional news sites[8] as popular websites and "platforms for content" appear on some countries' top lists.

Said differentiation between (social media) platforms and messaging services appears to play an even more important role with regard to the spread of Corona-related (dis)information.[9] While Facebook and, to a slightly lesser extent, Twitter, Instagram and other popular platforms are nearly always mentioned as a spreading medium, some replies explicitly point towards an increasing importance of messaging apps in circulating Covid-related disinformation.[10] One report explicitly mentions the increasing practice of "chain-messaging via Viber and WhatsApp platforms, with disinformation about various aspects of the pandemic."[11] Adding to this, a reference from Israel argues that in the country "WhatsApp's

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[6] Submissions were handed in between 7 October and 12 November 2020.

[7] Question 1, submissions from Germany, Israel, Spain, but also Belgium, Bosnia and Herzegovina, Croatia, and Portugal.

[8] E.g. Klix.ba and Avaz.ba in Bosnia and Herzegovina, Ynet in Israel.

[9] However, it should be noted that most of the replies rely on qualitative assessments. Comprehensive empirical evidence on the differences between platforms/messengers in this regard is still missing, as specifically pointed out by the submissions to Question 2 from Albania, Cyprus, Germany, Israel, Latvia, Norway, and Serbia.

[10] Question 2, submissions from Bosnia and Herzegovina, Croatia, Denmark, Germany, Israel, Latvia, Portugal, South Africa, and Spain.

[11] Question 2, submission from Bosnia and Herzegovina. Similarly, also the submission from Albania.

groups are more dangerous in this time than public platforms such as Twitter, [as] the spreader identity provides credibility to the message delivered."[12] This is in line with a (non-representative) inquiry from Germany, arguing that the disinformation is published on content platforms like YouTube and spread via messaging or social networks like WhatsApp and Facebook.[13]

In terms of distribution channels, several submissions have also shown a shift from social networks towards – in terms of measures against disinformation – more lenient, if not indifferent, messaging services like Telegram and Viber.[14] It could be argued that groups/channels on such messaging platforms are on the rise as adversary (and non-observable) public fora internationally. This international notion also includes the *transnational* spread of certain disinformation, especially due to the common Russian language proficiency in Eastern Europe, as the example of Latvia shows: its submission details that "several fake news have also been distributed in Russian or have been translated from this language".[15]

The reported counter-measures against such disinformation generally belong to one of two categories: the first one concerns the platforms' own efforts to counter disinformation, e.g. labels for potentially harmful, misleading information on Twitter;[16] Covid-19-related content moderation rules on YouTube;[17] a WHO chat bot on WhatsApp;[18] and increased content moderation in cooperation with third-party fact-checkers on Facebook[19]. Those measures, however, are not country-specific and (apparently step-by-step[20]) applied without significant national differences – if differences in language and cooperating fact-checking organizations are left aside.[21] Of all surveyed countries, only South Africa appears to be an exception here, as "misinformation is removed in response to public outrage or the possibility of criminal prosecution rather than any measures imposed by the social media platforms themselves."[22]

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[12] Question 2, submission from Israel.

[13] Question 2, submission from Germany.

[14] Question 2, submissions from Germany and Latvia.

[15] Question 2, submission from Latvia.

[16] See https://blog.twitter.com/en_us/topics/product/2020/updating-our-approach-to-misleading-information.html.

[17] See https://support.google.com/youtube/answer/9891785?hl=en.

[18] See https://www.whatsapp.com/coronavirus/who/?lang=en.

[19] See https://www.facebook.com/formedia/blog/working-to-stop-misinformation-and-false-news.

[20] Cooperation for fact-checking on Facebook in Latvia and Estonia was only started this spring, see submission from Latvia to question 4.

[21] Question 3, submissions from Argentina, Belgium, Croatia, Denmark, Germany, Israel, Italy, Latvia, Portugal, Serbia, and Spain.

[22] See above question 3, submission from South Africa.

Besides the platforms' own efforts, there have been notable examples of *external* initiatives to counter disinformation on platforms. One is a service to support journalists in verifying social network content: the platform called "Truly Media" was developed already before the pandemic, but has recently gained additional traction in Cyprus.[23] Another platform-external effort is a new bottom-up initiative to counter disinformation online: a regional central/south-eastern European consortium of fact-checking portals created its own public Viber Channel titled (translation) "Covid-19 Checked"[24] – thereby entering the area of direct messaging to counter disinformation. Apart from such single cases, governments and traditional news media have been named by many submissions as providers of specific initiatives against disinformation outside the platforms, but sometimes also as "trusted sources" in cooperation with social networks.[25]

In general, governments of all surveyed countries have urged the public to consume information about Covid-19 in a responsible manner and warned against the dangers of disinformation in social networks. While in most countries the administrations' argument refers to the danger for individual and public health, some warned against a threat to *public order* as such.[26] Beyond the governments' usual public relations outreach, several submissions describe the establishment of new governmental institutions to counter online disinformation during the pandemic, e.g. an anti-fake-news task-force in Italy or a special team at the Belgian police to search specifically for Covid-19-related disinformation.[27]

When it comes to public comments on the topic by politicians and other officials, the majority of reported statements include the importance of a careful handling of Covid-19-related information. However, they do not elaborate on potential sources for the disinformation. If those are mentioned, the diagnosis is inconsistent: while some argue there was no "organized disinformation, rather more emotion-driven circulation of false information,"[28] in other cases the involvement of foreign actors is at least implied.[29] Similarly inconsistent is their attribution of responsibility for a proper handling of disinformation. On the one hand, politicians "expect social networks to live up to their responsibility,"[30] on the other hand, they emphasize that "the main emphasis is precisely on individual responsibility and not one of the platforms."[31]

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[23] See above question 3, submission from Cyprus.

[24] See above question 3, submission from Bosnia and Herzegovina.

[25] See above question 3, submissions from Belgium, Finland, Israel, Latvia, and Norway.

[26] Question 4, submissions from Germany and Israel.

[27] Question 4, submission from Italy, and questions 4 and 5, submission from Belgium.

[28] Referring to spring and summer of 2020, see Question 4, submission from Latvia.

[29] Question 4, submissions from Germany and Norway.

[30] Question 4, submission from Germany; similarly, the Latvian President Egils Levits quoted in the submission from Latvia.

[31] Question 4, submission from Latvia.

Besides the abstract mentioning of Covid-19-related disinformation, some officials explicitly responded to certain content, for example the conspiracy theory that Covid-19 was caused or spread by 5G mobile communication technology or that potential vaccinations were intended to implant subdermal microchips.[32] Such and similar conspiracies occur in many of the surveyed countries,[33] often including certain "perpetrators" or "scapegoats" on which the pandemic is blamed. Most common in this regard is the idea that Bill Gates was "behind" Covid-19. [34] Likewise prevailing is the notion that the virus was a biological weapon developed by China or the US.[35]

In addition to such theories of the *origin* of Covid-19, the pandemic is used to foster existing prejudices against minorities and already vulnerable societal groups – including Jews,[36] Asians,[37] and migrants.[38] Equally notable is the reported prejudice mentioned in the reports from Lithuania and Serbia that Covid-19 was spread by NATO troops stationed in the respective country.[39]

Court decisions on the removal of Covid-19-related content were not available to all researchers. This might also be due to the impact the pandemic had on court proceedings.[40] However, information concerning criminal proceedings against users was available in multiple countries. In that regard, contributions reflect different national approaches to governing speech online: while there is a group of countries in which individual users have been prosecuted for spreading "fake news" as a misdemeanor under the respective national criminal law,[41] reported criminal proceedings in other countries are limited to violations of social distancing rules offline,[42] documentations of such violations in content posted online[43] or cases of online-incitement to commit offline-violations (such as to attend prohibited protests).[44]

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[32] Question 4, submissions from Israel and Lithuania.

[33] For 5G, see Question 6, submissions from Argentina, Bosnia and Herzegovina, Lithuania, Serbia, and Spain. For micro-chipping, see the respective submissions from Albania and South Africa.

[34] Question 6, submissions from Albania, Bosnia and Herzegovina, Germany, Latvia, Lithuania, Serbia, South Africa, and Spain.

[35] Question 6, submissions from Latvia, Norway, and South Africa.

[36] Question 6, submissions from Albania and Germany.

[37] Question 6, submissions from Bosnia and Herzegovina, Cyprus, Germany, Israel, Italy, Latvia, Portugal (a).

[38] Question 6, submissions from Belgium, Bosnia and Herzegovina, Denmark, Germany, Italy, and Serbia.

[39] Question 6, submissions from Lithuania and Serbia.

[40] Question 7, submission from Albania.

[41] Question 7, submissions from Bosnia and Herzegovina, Croatia, Israel, and Serbia.

[42] Question 7, submission from Belgium.

[43] Question 7, submission from Spain.

[44] Question 7, submission from Germany.

Overall, it seems the pandemic has not (yet) reframed the way private actors are conceived of as potential enforcers of public rules. On the one hand, the enforcement of mask-wearing obligations by railway companies was debated in three countries,[45] and shopkeepers and education institutions were widely obliged to ensure mask-wearing and social distancing rules within their respective spaces.[46] However, as for the broader discussion on private enforcement of public rules, participating countries are both individually and collectively far away from a consensus whether private actors, be they railway companies, shopkeepers or online platforms, should or should not "play policeman".[47]

Across all submitting countries, online platforms have been used to disseminate governmental or municipal restrictions and suggestions pertaining to Covid-19,[48] underlining the importance platforms such as Facebook or Twitter have for communicating governmental information.

The use of these platforms seems to focus on spreading easy-to-access overviews of rules and suggestions,[49] likely in response to the complexity and volatility of infection prevention rules and suggestions: in the pandemic, platforms seem to become increasingly crucial spaces to receive information about changes to (infection prevention) rules and, perhaps even more importantly, to receive information that helps to make sense of the fast-changing letter of the law. In this respect, governmental entities have in two submitting countries formed new alliances with social media influencers as a means to convey accessible Covid-19-related information.[50]

According to the submitting researchers' individual, qualitative assessments, the role of platforms in dealing with Covid-19-related discourses/disinformation has not (yet) significantly impacted the way these platforms are considered. Although some submissions point to an increasing public awareness regarding issues such as Covid-19 disinformation,[51] most of those assert, in one form or another, that "it does not appear (for now) that (…) Covid-19-related disinformation has impacted public opinion regarding the role of platforms (...)",[52]

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[45] Question 7, submissions from Belgium, Germany, Israel, and Italy.

[46] Question 7, submissions from Bosnia and Herzegovina and Israel,

[47] Question 7, submission from Belgium, quoting former Belgian Prime Minister Sophie Wilmès saying Shopkeepers "Shouldn't play policeman", from Rik Arnoudt, 'Mondmaskerplicht in Winkels: "We Rekenen Op Gezond Verstand van de Mensen", Zegt Premier Wilmès' *VRT NWS* (10 July 2020); see also Question 7, Submission from Italy.

[48] Question 9, all submissions; Question 11, submission from Albania cites criticism of the Albanian Prime Minister's overly intensive use of Facebook as a means of communication opposed to other traditional forms of governmental communication.

[49] Question 9, submission from Belgium.

[50] Question 9, submissions from Belgium and Finland, Question 12, submission from Finland.

[51] Question 10, submissions from Belgium, Bosnia and Herzegovina, Croatia, Denmark, Germany, Israel, Serbia, and Spain; with the submissions from Belgium and Spain, pointing to statistical evidence for this development.

[52] Question 10, submission from Belgium.

assessing that any current debate's "focus is usually on specific instances of moderation decisions, (…) and a wider or a more systematic reconsideration of the role of platforms is lacking."[53]

Assessments regarding the question whether platforms have dealt with Covid-19-related discourses and disinformation sensibly vary: some submissions assert that platforms have done rather well in striking the necessary balance between respecting freedom of expression and necessary intervention,[54] while other researchers fear that the platforms' removal of Covid-19-related content might be a gateway to overly invasive content moderation practices in general.[55]

The importance attached to the problems of private content moderation seems to vary due to differences in perceived reliability or trustworthiness of other, official information about the spread of Covid-19: where official information on Covid-19 is scarce, addressing this scarcity is considered as a more pressing step (than private intervention) towards limiting the spread of disinformation.[56] Moreover, contributions underscore the need for further research into the pandemic's effect on private content moderation practices.[57] Overall, responses to the question whether platforms dealt with the issue sensibly were positive. In most states, platforms succeeded in providing access to authoritative information on the pandemic.[58] Covid-19-related moderation in some cases even led to positive spillover effects on moderation practices regarding hate speech.[59] The interplay of information provided by states, traditional media outlets and platforms is explicitly mentioned as fruitful in combating disinformation in some cases.[60]

Some submissions, however, point out inadequacies in the moderation of disinformation on platforms.[61] This relates to inadequate expertise and insufficient staffing,[62] lack of effort,[63] lack of a country-tailored approach,[64] missing interlinkage with reliable official sources,[65] and

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[53] Question 10, submission from Bosnia and Herzegovina; similar assessments can be found in Question 10, submissions from Germany, Italy, and Serbia.

[54] Question 11, submissions from Albania and Germany,

[55] Question 11, submission from Denmark.

[56] Question 11, submission from Serbia; also reflected in Question 12, submissions from Croatia and Lithuania.

[57] Question 11, submissions from Germany and Spain.

[58] Question 11, submissions from Belgium, Bosnia and Herzegovina, Estonia, Germany, Italy, Latvia, and Lithuania.

[59] Question 11, submission from Bosnia and Herzegovina.

[60] Question 11, submissions from Finland, Latvia, Lithuania, and Norway.

[61] Question 11, submissions from Albania, Estonia, Israel, Portugal, Serbia, South Africa, and Spain.

[62] Question 11, submission from Albania.

[63] Question 11, submissions from Israel and South Africa.

[64] Question 11, submission from Portugal.

[65] Question 11, submission from Serbia.

unclear duties of platforms.[66] The main challenges identified in some countries relate to ensuring the authenticity of information on platforms,[67] the misuse of disinformation on the pandemic as a tool for party politics,[68] and a lack of private-public cooperation in the combat of disinformation, for example when content flagged as disinformation by officials was only removed by platforms in 50% of the cases.[69] The Portuguese submission suggests, instead of removal, a real-time fact-checking system that uses a color scheme to classify information – "green for OK, yellow for unchecked, and red for confirmed 'fake news'". In addition, the interests behind content should be made transparent, e.g., on the funding of the respective sites.[70] A challenge to such a system could be, as pointed out in another submission, conflicting statements from experts and investigative journalists and inadequacies of the official information system.[71]

Recommendations

There are some common denominators to be identified in the recommendations on the roles of state authorities, companies/platforms, and civil society. One of these denominators is the need for more efforts regarding active information and transparency: states should act more transparently themselves regarding their emergency measures and reasons therefore and communicate accurately, timely and responsibly.[72] To be able to do so in a credible manner, the quality of the underlying emergency legislation is important, as contradictory norms result in contradictory governmental communication.[73] Another common denominator is a call for active cooperation of states, platforms and civil society. One concrete recommendation in this regard is the establishment of contact points in every country that coordinate cooperation.[74] Critical information on (seemingly) divisive topics, such as purchasing agreements for vaccines in the present climate, should be communicated particularly transparently by governments.[75]

States should actively use platforms in their efforts, according to some of the recommendations.[76] One submission calls for positive incentives provided by the state for platforms to prioritize "truth" instead of profits.[77] Others point towards a need for restraint

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[66] Question 11, submission from Spain.
[67] Question 11, submission from Albania.
[68] Question 11, submissions from Albania and Argentina; Question 12, submission from Argentina.
[69] Question 11, submission from Belgium.
[70] Question 11, submission from Portugal.
[71] Question 11, submission from Serbia.
[72] Question 12, submissions from Albania, Belgium, Bosnia and Herzegovina, Croatia, Israel, Italy, Lithuania, Norway, Serbia, and South Africa.
[73] Question 12, submission from South Africa.
[74] Question 12, submission from Bosnia and Herzegovina.
[75] Question 12, submission from Norway.
[76] Question 12, submissions from Bosnia and Herzegovina, Finland, and Latvia,
[77] Question 12, submission from Belgium.

from the state when trying to legislate against the spread of disinformation in order not to harm freedom of expression.[78] When considering legislative action, some contributions call for specific national regulation of social media platforms,[79] while the contribution from Germany, where such regulation is already in place, underlines the need to assess the possible adverse impacts of this legislation (NetzDG) during the pandemic.[80]

Researchers recommend that platforms continue their efforts in enhancing access to reliable information[81] as well as in removing disinformation.[82] A number of contributions underline the need for platforms to more transparently communicate the extent in which Covid-19-related disinformation is removed.[83] Recommended new models include the establishment of co-regulatory measures on a country-by-country basis.[84] This would represent a paradigm shift, considering the fact that platforms have, so far, succeeded in ensuring the opposite: the submissions show that the nationalization of platforms' responses to Covid-19-related disinformation is limited to fairly narrow, globally rolled-out "docking sites" for national authorities within their platforms (e.g. featured spaces for health authorities or access to chatbot-channels).[85]

There is a broad consensus within the submissions that platforms should actively and transparently check content to prevent disinformation and provide access to reliable information.[86] To do so effectively, they should not merely rely on algorithms, but use sufficient human moderators and provide adequate funding.[87] One part of the recommendations explicitly calls for *self*-regulation of platforms in this regard.[88] Platforms should moderate bearing in mind their users' right to freedom of expression and avoid the impression of censorship.[89] There is no clear preference for either deletion or flagging of content conveying disinformation.[90] Algorithmic content classification should be further developed to be able to take context into account.[91]

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[78] Question 12, submission from Denmark.

[79] Question 12, submissions from Bosnia and Herzegovina, Cyprus, and Spain.

[80] Question 7, submission from Germany.

[81] Question 12, submissions from Argentina and Belgium

[82] Question 12, submissions from Argentina and Belgium

[83] Question 12, submissions from Bosnia and Herzegovina, Germany, Israel, Italy, Lithuania, and Portugal (a).

[84] Question 12, submission from Bosnia and Herzegovina.

[85] Question 3, submissions from Albania, Belgium, Croatia, Denmark, Estonia, Germany, Israel, and Italy.

[86] Question 12, submissions from Albania, Argentina, Belgium, Bosnia and Herzegovina, Cyprus, Finland, Portugal, Serbia, and Spain.

[87] Question 12, submissions from Albania and Belgium.

[88] Question 12, submissions from Cyprus, Portugal, and Serbia.

[89] Question 12, submissions from Argentina and Latvia,

[90] There are, however, some recommendations that clearly favour flagging over removing: Question 12, submissions from Norway and Latvia.

[91] Question 12, submissions from South Africa and Spain.

Public/private collaborations for spreading official information are contextualized in significantly different ways across submissions. While the Finnish submission evaluates the national authority's approach to collaborate with influencers as multipliers for reliable information as an efficient way to combat disinformation,[92] the German submission focuses on the dangers for misuse of platforms' power to magnify governmental information. It explicitly calls for limiting such governmental use of platforms to the ongoing health crisis. It can be concluded that this should hold true also for other, comparable crises.[93]

The (present and future) role of civil society is mainly portrayed as a provider of (social) media literacy, multiplier of reliable information, factchecker, flagger of disinformation, and watchdog keeping in check platforms and governments.[94]

Concluding from the above observations and recommendations, the present health and information crisis has led to broad common understandings in many aspects. Lawmaking, political communication, the creation of information and the power structures behind it, and the moderation of content ought to be more transparent – with or without a crisis. However, the statements we analyzed in this study also highlight some of the disputed territories of (social) media regulation in Europe. The underlying questions about the existence of objectifiable truth (as opposed to "fake news"), the danger of opening Pandora's box of governmental control over platforms as private entities used to disseminate this unclear "truth", and the danger of encouraging overbroad content governance by private actors are among the most pressing of these questions. These potential negative impacts on human rights might also explain the preference of some commentators to remain within the boundaries of platform self-regulation and not to overstress state's responsibilities. Some submissions, on the other hand, show an openness for more government intervention and regulation – a development that is well underway during the Covid-19-pandemic. The nature and exact scope of the related national norm-making if implemented, together with the harmonization efforts at the EU level, will play a key role in the shaping of the post-pandemic information society.

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[92] Question 12, submission from Finland.
[93] Question 12, submission from Germany.
[94] Question 12, submissions from Argentina, Belgium, Bosnia and Herzegovina, Cyprus, Italy, Latvia, Lithuania, Norway, South Africa, and Spain.