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# **The Influence of Political Advocacy NGOs on Meta's Human Rights Content Moderation Process: Gaza 2021 Case Study**

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NGO Monitor's mission is to provide information and analysis, promote accountability, and support discussion on the reports and activities of NGOs claiming to advance human rights and humanitarian agendas.

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## Overview and Summary of Key Findings

During the May 2021 conflict between Israel and Palestinian terrorist organizations in Gaza – a conflict that was accompanied by rioting and mob violence in mixed Jewish-Arab cities in Israel – Facebook removed content that violated its community standards by promoting violence or praising the Hamas terror group. In response, political advocacy and anti-Israel NGOs launched a concerted global campaign accusing Meta (Facebook's parent company) of “silencing Palestinian voices” and demanding that it modify content moderation decisions in order to permit such posts.

Over the following months, these politicized actors engaged with multiple Meta and Meta-associated frameworks, such as the Oversight Board, as well as with an external company – BSR – that Meta had tasked with evaluating its content moderation decisions during the May conflict. Ultimately, the campaigners were successful in generating a review by Meta's human rights division regarding policies addressing incitement, the glorification of violence, and praise for terrorism.

NGO Monitor's analysis of this episode documents the extensive interaction between Meta and political advocacy NGOs – including Human Rights Watch (HRW) and 7amleh – and their substantial influence on the process, despite extensive histories of anti-Israel campaigning, and in the case of 7amleh, support for violent and incendiary social media content. (See Appendices 1 and 2)

Our conclusions are based upon a review of public comments submitted to the Oversight Board and the Board's ensuing decision, as well as BSR's evaluation, Meta's response to BSR, and NGO publications, events, and social media posts regarding this campaign. In addition, in March 2023, NGO Monitor discussed the review process and the methodologies employed with senior officials at both Meta and BSR directly involved in these events.

A key component that emerges from this case study are concerns regarding lack of impartiality, insufficient due diligence by company gatekeepers, and potential conflicts of interest. Notably, NGO Monitor research identified several significant Meta figures who are former employees of HRW, one of the NGOs involved in the campaign directed at Meta. Another Meta official, whose employment began in the midst of the proceedings, previously worked at a different advocacy NGO that had been promoting the specific campaign during and after the conflict. In addition, members of Meta's Oversight Board have displayed clear bias on the relevant issues that should have resulted in their recusal. It is not known if such action was taken, as the Oversight Board does not reveal the names of the members that deliberate on specific enforcement

decisions. This record seriously undermines the objectivity and credibility of Meta's content moderation review and consulting processes, particularly in the context of the Israeli-Palestinian conflict.

In a wider sense, this analysis documents the degree to which policy-making at Meta is susceptible to influence by political advocacy NGOs. It is unclear what if any mechanisms exist to ensure that organizations and individuals who post violent material to Facebook are disqualified from participating in and influencing policy-making consultations. Similarly, the company, including the Oversight Board – or partners such as BSR – do not appear to employ safeguards to avoid manipulation through partisan publications and statements promoted by politicized NGOs under context-determined normative labels such as human rights.

Lastly, our review addresses the details of BSR's [September 2022 report related to the content moderation process in this case](#). We find that BSR's framing of the conflict is inherently political and incorporates the biases promoted in the NGO campaign, reflecting extensive interaction between BSR and these advocacy NGOs. In contrast, the limited reference to the experiences of Israeli rightsholders and stakeholders, particularly victims of the attacks from Gaza and within Israeli cities, raises fundamental questions regarding this process, the report and BSR's recommendations.

In addition, the absence of criteria for the selection of events for emphasis or omission – such as extensive Palestinian violence – reinforced a highly subjective analysis.

## Overview of Meta's Decision to Seek an External Evaluation

Meta's decision to solicit an external evaluation regarding content moderation during the May 2021 conflict was preceded by a coordinated NGO campaign, utilizing Meta's appeals process, as well as public lobbying and advocacy tactics.

The core activist claim against the social media company cited the removal of content labeled "violent and incendiary" relating to rockets fired from Gaza-based Palestinian terrorist organizations at Israeli population centers, and to the rioting that took place in mixed Jewish-Arab cities in Israel. Intense NGO campaigning sought to stop Meta from removing this content on its platforms.

HRW and 7amleh led this campaign, and as detailed below, the comments submitted to the Oversight Board as well as BSR's subsequent report reflect the agendas of these NGOs. The two highly politicized advocacy organizations lead and contribute

centrally to international anti-Israel advocacy campaigns under the banner of human rights. In addition to [twisting and exploiting the "apartheid" label](#) as a means of denying the Jewish people the right to self-determination (an example of antisemitism according to the consensus [working definition of the International Holocaust Remembrance Alliance](#)), HRW has spearheaded [boycott \(BDS\) campaigns](#), including targeting the Israeli banking sector and sports clubs, as well as seeking to intimidate international corporations with a presence in Israel and the West Bank, and [agitating for a UN "blacklist"](#) of companies operating beyond the 1949 Armistice Line. HRW's systematic bias and advocacy agenda have been [documented in detail](#), including in academic publications.

Notably, two key Meta figures, Iain Levine and Miranda Sissions, are former HRW employees, and a third, Gabrielle Guillemain, was an NGO activist involved in campaigning against Meta's content moderation policies during the May 2021 conflict prior to her employment at Meta (see details below).

Similarly, 7amleh is a particularly inappropriate partner for Meta and BSR in this context. In contrast to the NGO's claims to "[advocate for Palestinian digital rights with the aim of reaching a safe, fair and free digital space](#)," 7amleh routinely supports posts that celebrate terror attacks against Israeli civilians (see examples below), as well as content praising terror groups. Additionally, 7amleh board members and officials have themselves posted such content to Facebook, with a high-ranking official reporting that several of his posts were removed from the platform.

HRW and 7amleh exemplify the deep politicization of the universal human rights discourse, the demonstrations of bias, and the absence of credible and consistent criteria. Their central involvement and influence in the processes surrounding the issue of Facebook content moderation during the 2021 Gaza conflict highlight the problematics of Meta's [Corporate Human Rights Policy](#), which refers to consulting with "international human rights experts when developing these standards... and when deciding how to implement them in practice." The inherent ambiguity and subjectivity of this policy and process - including the evaluation of public comments by the Oversight Board - creates conditions for manipulation and political bias.

#### *Triggering Action: Posted Al-Jazeera Article Reviewed by Oversight Board*

On May 10, 2021, under its content moderation policies related to terror, Facebook removed a post by an Egyptian user, who had linked an Al-Jazeera article reporting on Hamas threats of violence. Following the user's appeal of the decision to Meta's Oversight Board, Facebook reversed its initial decision and reinstated the post.

The NGO pressure campaign directed at Meta, examined in detail below, began shortly afterwards, including 7amleh's publication, "[The Attacks on Palestinian Digital Rights.](#)" According to [the organization](#), "on Tuesday, May 18, the Palestinian Prime Minister, Muhammad Shtayyeh, met with the Facebook's Head of Global Affairs and Communications, Nick Clegg, and 7amleh's Local Advocacy Manager, Mona Shtaya." Allegations included "shrinking the Palestinian digital space and contributing to violating Palestinians human rights." This meeting came after a letter sent by 7amleh on May 17<sup>th</sup> to Facebook's CEO, Mark Zuckerberg, that called for Facebook to stop shrinking the Palestinian digital space and contributing to violating Palestinians human rights." In addition, HRW officials sent public [letters](#) under the heading "Censorship of Palestinian Content on Facebook and Instagram," to Facebook's Director of Human Rights, Miranda Sissions, and the company's "Senior Human Rights Advisor," Iain Levine. Both individuals had previously been employed by HRW.

In June, the Oversight Board announced that it would investigate the moderation decision regarding the posted Al-Jazeera article, soliciting public comments. The process by which this decision was taken is not transparent. A review of the [26 comments that the Board received](#) reveals a number of submissions from anti-Israel advocacy organizations, including 7amleh, Jewish Voice for Peace (JVP), Foundation for Middle East Peace (FMEP), and Arab Resource and Organizing Center (AROC), as well as from allied groups such as Mnemonic, Access Now, and Fight for the Future. In reviewing the content, we note:

- Many of these organizational submissions repeated similar talking points, complaining about the Israeli Ministry of Justice's "Cyber Unit" and asserting that Facebook maintains an anti-Palestinian bias regarding content moderation that must be corrected.
- Reflecting the coordinated nature of the submissions, those from JVP, AROC, and Fight for the Future contain nearly identical language regarding the "Cyber Unit" and the Oversight Board.
  - Both AROC and Fight the Future end their submissions by stating, "We hope that the Facebook Oversight Board will take seriously repairing the trust that has recently been eroded with communities of human rights advocates and Palestinians as we strive to hold the Israeli authorities accountable for human rights violations. We are very concerned about the impact of the Israeli Ministry of Justice's Cyber Unit's efforts to silence Palestinians and human rights supporters, and the impact that this unit may be having on Facebook's policies and practices. The FOB has been presented to our communities as an independent, unbiased body and we hope that its decision will reflect the valuing of all users' freedom of expression."

- JVP's submission contains nearly identical language.
- An [attachment to the Electronic Frontier Foundation](#) (EFF) submission cited to [stopsilencingpalestine.com](#), a website jointly supported by EFF, 7amleh, JVP, Mnemonic, Access Now, Article 19, and others involved in the campaign against Meta content moderation policies.
- Notably, in addition to its own submission, two other petitions to the Oversight Board cited 7amleh, amplifying the NGO's campaign, described below.

### *The Oversight Board's Decision*

[On September 14, 2021, the OSB issued its decision](#), affirming Facebook's move to reinstate the post. Reflecting the focused and coordinated NGO campaign designed to influence this process, the Oversight Board noted that "Public comments submitted for this case included allegations that Facebook has disproportionately removed or demoted content from Palestinian users and content in Arabic, especially in comparison to its treatment of posts threatening anti-Arab or anti-Palestinian violence within Israel." (The Board did add, "At the same time, Facebook has been criticized for not doing enough to remove content that incites violence against Israeli civilians.")

Crucially, the Oversight Board recommended that Facebook "engage an independent entity not associated with either side of the Israeli-Palestinian conflict to conduct a thorough examination to determine whether Facebook's content moderation in Arabic and Hebrew, including its use of automation, have been applied without bias. This examination should review not only the treatment of Palestinian or pro-Palestinian content, but also content that incites violence against any potential targets, no matter their nationality, ethnicity, religion or belief, or political opinion. The review should look at content posted by Facebook users located in and outside of Israel and the Palestinian Occupied Territories. The report and its conclusions should be made public."

### *Evidence of Bias Among Oversight Board Members*

In this context, we note that two Oversight Board members expressed highly prejudicial views during the May 2021 conflict. In a [May 15 Facebook post, Tawakkol Karman](#) professed her support for "the Palestinian people's struggle against the Israeli occupation that has occupied the land, expelled the people and carried out Immeasurable terror against the Palestinians. May every occupation end, victory to the peoples...."

Similarly, in a [May 17 entry on his blog, Khaled Mansour wrote](#), "the apartheid regime and the Israeli occupation are the root source of the problem and the cause behind this

bloody violence in which Palestinians pay an immeasurably heavier costs than Israelis. These kind of prices were paid by many peoples in the periods of colonialism and apartheid, which ended in almost all the world, except for our region and specifically in Israel and the Palestinian enclaves surrounded by the Israeli military mechanism.”

These factors raise fundamental concerns regarding Meta's procedures in evaluating the content moderation complaints in the context of the conflict, particularly with respect to the role of the Oversight Board. The absence of transparency prevents analysis of the roles that partisan members of the Board play in influencing the process, and adds to the potential for political manipulation. Given the central role of the Oversight Board, and biases among its members, issues regarding oversight with respect to procedures are of major import.

## 7amleh and HRW Campaigning

In addition to NGOs leveraging the Oversight Board public comments framework, both HRW and 7amleh engaged in a media advocacy campaign that sharply criticized Meta for its conduct:

- On May 21, 2021, 7amleh published, “[The Attacks on Palestinian Digital Rights](#),” which claims to show “increases in attacks on Palestinian digital rights...on various social media and technology platforms,” during May 2021.
- On June 28, 2021, HRW Director of Business & Human Rights, Arvind Ganesan, addressed a [letter](#) (see also [here](#)) titled “Censorship of Palestinian Content on Facebook and Instagram,” to Facebook’s Director of Human Rights, Miranda Sissions, and the company’s “Senior Human Rights Advisor,” Iain Levine. In this context, we note that:
  - Iain Levine was employed at HRW from 2003 to 2018, where he served as a “[Deputy Executive Director](#).” During this time, the [NGO led several anti-Israel BDS campaigns](#), including efforts targeting the Israeli banking sector, Israeli sports clubs, intimidation of international corporations working in Israel and the West Bank, and [agitating for a UN “blacklist”](#) of companies operating beyond the 1949 Armistice Line.
  - According to her [LinkedIn account](#), Miranda Sissions served as a HRW “researcher, Mena Division” in 2001-2004. In 2003, Sissions was [arrested](#) during a raid by Israeli security forces on the [International Solidarity Movement](#) (ISM) offices in the West Bank town, following a suicide bombing carried out by terrorists who had [previously met with ISM activists](#).

- In October 2021, HRW published "[Facebook Censors Discussion of Rights Issues](#)," a report that calls for "an independent investigation" in which "investigators closely consult with civil society at the outset of the investigation." Notably, the document cites 7amleh allegations in multiple instances.

In addition to this campaign directed towards Meta, NGO statements following the release of the September 2022 BSR report reveal the extent to which these organizations sought to influence and manipulate that assessment of Meta policy:

- On November 9, 2022, (6 weeks after the BSR report) 7amleh [organized](#) a webinar "Meta, Let Palestine Speak," which featured Mona Shtaya (Advocacy Advisor - 7amleh), Dunstan Allison-Hope (Vice President – BSR) and Diala Shamas (Staff Attorney - Center for Constitutional Rights - a US-based political advocacy NGO). The panelists discussed "[the public campaign addressed at Meta executives](#) demanding that the company stops the silencing and censorship of Palestinian voices and narratives," and "the latest work on Meta to stop censorship of Palestinian Content!" **During the webinar, Mona Shtaya acknowledged 7amleh spoke with Dunstan Allison-Hope and BSR as the company was conducting its ostensibly "independent evaluation."** Allison-Hope added that "[A lot of credit must go to civil society organizations and activists for advocacy](#)" for forcing Meta to publish a response to BSR's report.
- On September 27, 2022, HRW and 7amleh were signatories to a "[Statement Regarding BSR's HRA for Meta on Palestine & Israel](#)" noting that "We appreciate and value BSR's efforts and professionalism through their assessment and independent review. **We especially acknowledge their engagement with local, regional and international stakeholders and right-holders throughout the process.**" The statement was also signed by three Palestinian NGOs designated by Israel as terror entities over their ties to the PFLP - [Al-Haq](#), [Addammer](#), and [DCI-P](#).

Notably, in September 2022, Gabrielle Guillemin joined Meta as a Human Rights Policy Manager. During the May conflict, Guillemin was a "senior legal officer" at the Article 19 advocacy group, one of the organizations – including 7amleh - behind <https://stopsilencingpalestine.com/>, calling on Facebook "to end the silencing of Palestinians and content and accounts related to Palestine."

- Regarding the May 2021 conflict, Guillemin retweeted several tweets from 7amleh, Article 19, and others, alleging Facebook "censorship" of Palestinians.



- Previously, Guillemin appeared on an April 2020 7amleh-organized panel, "[Are YouTube's Policies Biased Against Palestinians?](#)," and was interviewed by the organization in a [related publication](#).

These ongoing relationships are significant as Meta is currently evaluating BSR's recommendations. [On September 22, Meta's human rights division responded to BSR](#), stating, "We are deeply grateful to the numerous Israeli, Palestinian and international human rights defenders, civil society organisations, and others who provided input to this human rights due diligence. You have enabled us to make progress on the very important mitigations described in this response, benefiting people in Israel, Palestine and related diasporas around the world."

## Methodological Concerns in BSR's Report – NGO Influence and Partisan Framing

In its report, BSR purports to grade Meta's compliance with its own "Corporate Human Rights Policy" content moderation guidelines, as well as the non-binding UN Guiding Principles on Business and Human Rights. These voluntary principles are broad, non-specific, and open to very different interpretations and selective application, in contrast to clearcut policy guidance.

BSR acknowledges in its methodology section that it lacks the data to properly compare Meta's May 2021 performance relative to other periods. According to the authors, "it is important to note that there is no established 'ground truth' for what absolute or relative rates of content enforcement should be in Israel and Palestine, as no data is available for the prevalence of violating content at the country level (as opposed to the market level, such as the Arabic market)."

In lieu of such data, BSR notes that it obtained "the perspectives of a wide variety of affected rightsholders and stakeholders in Israel, Palestine, and globally." The sources of these "perspectives" are not identified by BSR, although the aforementioned NGO statements highlight the key influence of HRW and 7amleh. **The degree to which affected Israeli rightsholders and stakeholders, particularly victims of rocket attacks from Gaza and violence within Israeli cities, were involved to any degree in writing this report is unclear. The absence of information on this critical dimension, and the overall partisanship in BSR's report, raising fundamental questions regarding the efficacy of this process.**

In addition to unnamed NGO contributors, BSR also cites to multiple Wikipedia pages for background on the May 2021 conflict, and a tendentious statement by a UN

Human Rights Council Rapporteur for the Palestinians, [a position marred by bias](#), further undermining the credibility and independence of BSR's research.

Indeed, the report echoes these politicized narratives and agendas, particularly in framing the violent events of May 2021 and the conflict more broadly, as well as Meta's role. For example:

- BSR adopts a narrative that artificially frames the Israeli-Palestinian conflict as based on “modern power asymmetries in which the Israeli state has greater administrative, financial, and military might vis-à-vis Palestinian political institutions.” On this basis, the authors of the report assert that Meta is required to avoid “silencing voices” and “reinforcing power asymmetries,” – reflecting a core prior bias. **There is no normative foundation for the claim that subjective and perceived power imbalances can provide insights into assessing social media posts with respect to incitement, support for terror, and other relevant criteria under the heading of “community standards.”**
- BSR's report misleadingly asserts that fighting was “triggered by protests in East Jerusalem over the eviction of Palestinian families in the Sheikh Jarrah neighborhood,” erasing the context, [complexities and nuances of the decades-long property dispute](#) between tenants and owners, repeated attacks by Palestinians on Jews near the Old City in the weeks prior to the fighting, and Hamas' role in inciting violence in Jerusalem during this time.
- Similarly, the report continues, “This outbreak occurred in the context of Israeli occupation of the West Bank and increased tensions relating to the expansion of Israeli settlements and the eviction of Palestinian communities,” repeating Palestinian and allied NGO talking points.

#### *Ignoring Palestinian violence and incitement*

BSR's framing of the conflict emphasizes Israeli activity and Palestinian victims while grossly minimizing and even erasing the role of Palestinian actors in attacks on Israelis. Crucially, for a document purporting to address content moderation, this framing omits a [series of violent assaults](#) on [Jewish Israelis](#) in Jerusalem beginning in April, often [filmed and shared on social media](#). Similarly, it ignores ongoing Palestinian terrorism and incitement against Israelis more generally.

- In BSR's descriptions of the May conflict, Israel is described as launching “airstrikes targeting the Gaza Strip”, ignoring the rocket barrages launched at Jerusalem on May 10, which ignited the wider conflict. This framing also denies Israel's fundamental obligation to defend citizens against attacks from Palestinian terrorist organizations, including the launching of [approximately 4,300](#) rockets at Israeli communities. Notably, these 4300 Palestinian attacks on Israeli population centers (each one a war crime under international law) are

grossly minimized by BSR. For instance, merely characterized as “Further escalation, including protests, violence, and rocket strikes” in its “Broader Context” chart (p 3).

- Reflecting the inputs of the political advocacy NGOs, in describing a number of incidents, BSR repeatedly erases Arab violence, including only the Israeli responses. For instance, in a timeline of major events, the authors note that Israeli “Police enter Al-Aqsa during prayer,” without describing the [stockpiling of weapons](#) within the mosque and [attacks on Israeli personnel](#).
- Similarly, the authors parrot NGO talking points, [prominent in Zamleh statements](#), noting “External stakeholders interviewed by BSR reported cases where WhatsApp was used by right-wing Israelis in Israel to incite violence and coordinate attacks against both Arab and Jewish Israelis.”
- The document includes no reference to the lynching of Jewish Israelis by Israeli Arabs, or the attacks aimed at the destruction of Jewish-owned property - including homes, synagogues, and vehicles - in these attacks. Similarly, there is no mention of the use of WhatsApp by Palestinians and Arab-Israelis for incitement and coordination of violence.

While acknowledging the relevant legal restrictions on providing material support to designated terrorist organizations, BSR’s analysis fails to sufficiently recognize the impact of terrorism on rightsholders, as outlined in the UN Guiding Principles to which it cites.

## **The Logical Fallacy of Excusing All Posts made from Regions Controlled by a Terror Organization**

Again copying the politicized NGO framing, BSR also attempts to justify and legitimize posts that express enthusiasm for Hamas and its attacks against Israeli civilians, asserting that “Palestinians are more likely to violate Meta’s DOI policy because of the presence of Hamas as a governing entity in Gaza and political candidates affiliated with designated organizations... Palestinians are prevented from sharing types of political content because the Meta DOI policy has no exception for the praise of designated entities in their governing capacity.”

Such justification is of particular concern given that BSR was tasked with reviewing content moderation policies in the context of the conflict, during which Hamas both incited street-level violence in Jerusalem, and launched [approximately 4,300](#) rockets against Israeli civilians. It appears that BSR is implying that during the fighting, a substantial percentage of posts supporting Hamas were not directly linked to the

conflict, but rather with the status of the organization's control over Gaza. If this approach were accepted, no content moderation would be possible for posts from Gaza or any region controlled by a terrorist regime.

Furthermore, this exception would prevent content moderation regarding posts supporting terrorism or terrorist organizations made from other regions, such as Egypt, Jordan, Europe or North America. Thus, the logical concluding of this approach would lead to inconsistent and subjective content moderation, based on the nature of the regime in control of each region.

### *Evaluating BSR's Recommendations*

Reflecting these core biases and methodological failures, a number of BSR recommendations warrant additional analysis and consideration. The adoption of these recommendations could readily result in further bias and failures to meet content moderation requirements in situations of violent conflict and terrorism:

- *“Review the practice of designating deceased historical individuals under the DOI Policy and assess feasibility of alternative policy approaches to improve transparency and fairness.”*

Like all aspects of categorizing and classifying speech on social media, the process of classifying historical figures must be transparent and carefully considered. Meta should explain how and why certain individuals are classified, while providing the sources consulted to reach its determination.

- *“Establish a structure, protocol, or team to gauge over and under content policy enforcement in a systematic manner during a crisis.”*

Meta policy must include clear guidelines for selection of team members, to avoid bias and ensure fair and accurate representation. In some cases, this would include recusal as appropriate.

- *“Engage in stakeholder engagement and prepare public transparency statement(s) regarding Meta's understanding of its Foreign Terrorist Organization (FTO) and Specially Designated Global Terrorist (SDGT) obligations.”*

All such engagements and consultations must include a wide array of parties, including institutions and organizations dedicated to the prevention of terrorism, violent crimes, and hate speech, as well as those advocating for victims of such acts. Politicization of this process would further reduce credibility.

## Conclusion and Recommendations

This analysis of the process by which the Oversight Board issued its recommendations, followed by Meta's decision to commission the BSR consulting firm to produce a report on content moderation, as well as the methodology employed, in the specific case of the May 2021 Gaza conflict highlights several problematic aspects. The NGO campaign led by HRW and 7amleh and the potential conflicts of interest involving two central Meta officials – as well as potentially of Oversight Board members - appear to have influenced this process. Furthermore, BSR's analysis, particularly regarding the framing based on a subjective power imbalance as well as the absence of criteria for the selection of events for emphasis or omission, point to fundamental methodological failures in this evaluation of Meta's content moderation implementation. The presentation of this report as objective and unbiased is belied by the evidence of major influence exerted by the two advocacy NGOs as reflected in their extensive history of anti-Israel campaigning, and in the case of 7amleh, support for violent and incendiary social media content.

In this context, we make the following recommendations:

- Meta should immediately cease all cooperation with 7amleh, and the advocacy NGO's publications should not be consulted or relied upon in decision-making regarding content moderation, or other policies.
- In evaluating complaints regarding content moderation, including decision-making regarding outside involvement, Meta should practice full transparency with respect to consultations and procedures, including the role of the Oversight Board.
- Meta should require full transparency from ostensibly independent frameworks that are tasked with examining its behavior and consulting on company policy with respect to content moderation, particularly in the context of intense political conflicts. Meta should understand how its partners – including BSR – reach their conclusions, what their sources are, and what criteria are used to produce analyses. Specifically, BSR should publicize the names of the organizations it engaged with and identify the sources consulted to construct the factual and legal timeline of the events being reviewed.
- Oversight Board members should

- recuse themselves from involvement in cases on which they have personal involvement and on which they have commented publicly.

## Appendix I: 7amleh's anti-Israel bias and support for terrorists

7amleh consistently defends social media content supporting and praising Palestinian terrorists, while campaigning to defeat initiatives to protect Jewish users from online harassment. Importantly, its board members and officials have used Facebook to praise Palestinian terrorists and celebrate deadly attacks against Israeli civilians. In fact, by his own admission, 7amleh's official Ahmad Qadi has had Facebook posts removed over concerns that they "expressed my support or the resistance."

Notably, since 2020, the NGO has received funding from [Norway](#), [Switzerland](#), [Sweden](#), [Germany](#), and [the Netherlands](#). (For details on 7amleh's funding, see NGO Monitor's analysis)

The following examples depict the type of rhetoric and material promoted by the organization, its board members and officials:

- In a January 2022 article, 7amleh referred to the May 2021 conflict as "[the May uprising and the Israeli aggression on the Gaza Strip](#)," revealing an extreme and disqualifying bias. Such framing suggests support for the [approximately 4,300](#) rockets launched at Israeli civilians during the conflict, as well as the lynchings of Jewish Israelis and wanton destruction of their property by Arab rioters.
- In a May 2021 7amleh report, "[Hashtag Palestine 2020](#)," 7amleh criticized [Zoom's cancellation](#) of an on-line event in which San Francisco State University planned to host Leila Khaled - a [member of the PFLP](#) responsible for [multiple](#) airline [hijackings](#). 7amleh stated that, "It was revealed that the platform [Zoom] discriminates against Palestinian men and women." On October 5, 2020, 7amleh continued to [criticize](#) Zoom for "Shrinking Space for Freedom of Expression," following the cancellation, euphemistically referring to Khaled as "a well known Palestinian political figure."
- In a September 2, 2020 7amleh post, the NGO lauded [Sabri Khalil Al-Banna](#) - the longtime leader of Abu Nidal terrorist organization - and Ghassan Kanafani - a deceased PFLP leader -, labeling the pair "[distinguished Palestinian personalities](#)."
  - The group carried out terrorist attacks in multiple countries, killing or injuring almost 900 persons. [Major attacks](#) include simultaneous 1985

shooting attacks in Rome and Vienna airports, killing 20, and wounding 138, and a 1986 attack against a synagogue in Istanbul, killing 22.

- In March 2019, 7amleh published a report that ostensibly “analyzes the various policies and practices used by governments and authorities that threaten Palestinians exercising their digital rights and highlights examples of arrests of Palestinians for social media posts.” As an example, the NGO discusses the conviction of an Israeli Arab political figure Raja Eghbarieh. 7amleh simply notes that “Israeli police interrogated Eghbarieh for seven hours over posts he shared on Facebook over the past 12 months and an Israeli civil court allowed for his detention over the suspicion of ‘online incitement to violence and support of a terror organization’” – without providing any details of his posts.

As detailed in [court documents](#), Eghbarieh used Facebook to praise terrorist organizations and specific terrorists. He:

- Authored a post praising Hezbollah
- Referred to assailants that killed Israeli police officers in a July 2017 Jerusalem shooting as “martyrs” who will be accompanied “with the greatest pride” to heaven.
- Labeled Ahmed Jarrar - a Hamas member who murdered an Israeli civilian when he opened fire at motorists on January 8, 2019 - as one of “the true leaders of the nations,” who has “glory and eternal life.”
- Shared photos of PFLP founder George Habash and wrote, “Peace be upon your soul and may you have glory. You are the commander of the revolution...You shall live within us forever, commander.”

In addition to engaging on specific incidents, 7amleh has also sought to impugn content moderation policies designed to limit violent hate speech:

- In a [2021 publication](#), the organization castigated Israel for expanding the legal definition of incitement “to encompass not only speech that ‘directly calls for violence,’ but also speech that, in the judgment of prosecutors, ‘expresses support for terrorist acts,’ with or without a resolution to carry them out,” adding that “The broad definition of incitement has historically intimidated many Palestinian users into silence.”
- In 2020, [7amleh launched a campaign to pressure Facebook into removing Emi Palmor](#) from its oversight board. The NGO blamed the former Israeli Ministry of Justice Director-General for leading “efforts to censor Palestinian voices,” in conjunction with Israeli government requests that Facebook remove violent and inciting content.

- In response to an [August 2020 letter from 130 organizations](#) urging Facebook to adopt the IHRA working definition of antisemitism in order to prevent harassment of Jews on its platform, [Zamleh organized a webinar attacking the working definition](#) and opposing its adoption by social media platforms.

In addition to Zamleh's organizational efforts, its own board members and officials have used Facebook to celebrate violence against Israelis:

### **Neveen Abu Rahmoun**

Neveen Abu Rahmoun has [held a seat on Zamleh's board of directors](#) at least since [2019](#).

On May 11, 2021 - the day after Hamas initiated its rocket campaign by targeting Jerusalem and other Israeli cities with rocket barrages - he wrote "[The popular uprising has started and cannot be stopped](#), All Palestinians have come together in the face of the occupation's policies, tools and repression...The popular combative struggle is returning to everywhere."

Abu Rahmoun's reference to "all Palestinians" likely includes Israeli Arabs, and the words "combative struggle returning to everywhere" to mixed cities within Israel.

In this context, also on May 11, [Arab rioters stoned and critically wounded an Israel civilian](#), Yigal Yehoshua, who died of his wounds the following week.

On May 21, Abu Rahmoun summarized the fighting, writing, "[Salutations for Gaza the powerful that won for Sheikh Jarrah, Jerusalem and Palestine](#). It shall remain a school for fighting, life and steadfastness. May our people be well. Great salutations for Palestine's youths, who marked an important political stage and, with their combative action, surpassed the political leadership and returned to us the meaning of Palestinian togetherness...May the martyrs of Palestine have mercy and may the prisoners and detainees have freedom."

### **Ahmad Qadi**

Ahmad Qadi has been [Zamleh's "Monitoring and Documentation officer"](#) since [July 2021](#), and as such, was likely involved in preparing materials reviewed by BSR..

- On January 27, 2023, following a terrorist attack outside a Jerusalem synagogue in which 7 Israeli civilians were murdered, [Qadi posted on Facebook](#), "For decades, the Israeli criminal entity has been... sowing seeds of despair and doubt in the effectiveness of resistance. Even until now, the Israeli war machine has not been able to see the truth - that every Israeli crime is met with greater



determination for sacrifice, broader resistance and an untamed determination to victory.”

- On December 19, 2022, [Qadi shared a poster featuring deceased terrorist Nasser Abu Hamid](#), and wrote, “Imprisoned several times and never gave up the resistance...The history of Nasser Abu Hamid, the legacy of his combating family and the magnitude of the sacrifices made by [his] the family can shake the mountains...”
  - [Abu Hamid](#) was [one of the founders](#) of the Al-Aqsa Martyrs’ Brigades - designated as a terrorist organization by the US and the EU - and was [sentenced to seven life sentences](#) for the murder of seven Israelis. [Abu Hamid participated in the lynching of two Israeli soldiers in October 2000.](#)
- On January 4, 2015, [Qadi shared](#) pictures from a [November 2014 assault on a Jerusalem synagogue](#), in which Uday and Ghassan Abu Jamal [murdered five Israelis](#). Qadi wrote, “I have been wishing for pictures like these for a while, and I still wonder - of what these men are made of?! #deeply\_exciting.” Qadi also commented, “Heroes,” “Men of Palestine,” “Congratulations and mercy for all the resistance fighters and martyrs. Our loyalty is to whomever resists and to all who defend the honor of the Palestinian people and its nation...”



Qadi shared pictures from the 2014 Jerusalem synagogue attack, praising the attack and lauding the terrorists who carried it out.

(Source:

<https://www.facebook.com/ahmad.qadi.7/posts/pfbid0FK4yxyTpfSKsCV9qPEcey81J2s2P8CDJvs6TGz5V4umpQrxR4esa3iGTqUq9cLfql>)

- On [July 26, 2022, Qadi wrote](#), “...Facebook deleted several political posts of mine from 2014, surprisingly and at once...They checked the content that I published over the years to make use of patriotic content in which I mentioned martyrs and expressed my support for the resistance and so forth...This comes at a time when I personally face a campaign of defamation and incitement...under the pretext of ‘terrorism.’”

## Appendix 2: HRW Record of anti-Israel Campaigning

Though different than 7amleh, HRW is also an inappropriate source of information, due to its decades-long record of noncredible and disproportionate anti-Israel campaigning:

- In April 2021, HRW [published a report](#) denying Israel's legitimacy as a Jewish state by alleging Israel has committed crimes of apartheid, demanding states "Impose targeted sanctions, including travel bans and asset freezes, against officials and entities" as well as "Condition arms sales and military and security assistance to Israel.
- HRW [lobbied intensively](#) in [support](#) of the discriminatory UN database of businesses operating across the 1949 Armistice line, aimed at bolstering BDS campaigns against Israel.
- In December 2018, HRW, in cooperation with Israeli NGO [Kerem Navot](#), [published a report](#) as part of a [two-year long](#) coordinated and well-financed BDS campaign targeting Airbnb and Booking.com. The report [contained](#) numerous false claims regarding the legal and human rights responsibility of Airbnb in allowing Israelis from the West Bank to list their properties, as well as questionable methodology. [Airbnb ultimately rejected HRW's demands](#).
- In both [2017](#) and [2018](#), HRW issued reports encouraging BDS measures be applied against Israeli banks.

Due to the organization's failures, founder Robert Bernstein [published an article](#) in the *New York Times* ("[Rights Watchdog, Lost in the Mideast](#)," October 19, 2009) strongly criticizing the organization for ignoring severe human rights violations in closed societies, for its anti-Israel bias, and for "issuing reports...that are helping those who wish to turn Israel into a pariah state."

Moreover, Ken Roth, HRW's Executive Director from 1993-2022, has

- In July 2021, [Roth blamed Israel for antisemitic incidents in the UK](#), tweeting "Antisemitism is wrong, and long preceded the creation of Israel, but the surge in UK antisemitic incidents during the recent Gaza conflict gives the lie to those who pretend that the Israeli government's conduct doesn't affect antisemitism." [After intense criticism](#), Roth later deleted the tweet, claiming he was "misunderstood."
- In September 2014, Roth [blamed attacks](#) on Jews in Germany and the rise of antisemitism in Europe on Israel's conduct during the Gaza War. (For additional information, see NGO Monitor's "[Harvard Rejects Ken Roth's Anti-Israel Obsession](#)")