

Written evidence submitted by C2PA (OSB0240)



24 November 2021
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Dear Chair,

We are writing to you jointly as members of the Coalition for Content Provenance and Authenticity (C2PA) as your Committee is carrying out the important work of pre-legislative scrutiny of the draft Online Safety Bill.

The C2PA is a [Joint Development Foundation](#) project that brings together the efforts of the [Content Authenticity Initiative \(CAI\)](#) and [Project Origin](#). With the digital transformation of information sharing, the ability to trace the provenance of media has become critical. To address this issue at scale for publishers, creators and consumers, the C2PA is working to develop technical specifications for establishing content provenance and authenticity. Its members include Adobe, Microsoft, BBC, Twitter, ARM, Intel and Truepic, who are collectively building an open technical standard to provide provenance and attribution information for all forms of digital media. In short, this is to provide the basic facts about who created a piece of content, and how, when or where it was created or edited. Our goal is that this will become freely available to creators and consumers alike.

The role of provenance in tackling disinformation

As deceptive content online spreads faster than ever, we are witnessing extraordinary challenges to trust in digital information. We believe digital content provenance is the most feasible and scalable technology available to help counter this erosion of public trust. This approach empowers consumers with the information they need to understand the origin and history of a piece of digital content in a verifiable way, while also protecting content creators' privacy preferences.

In August, we were excited to announce that the C2PA had developed a [new draft technical specification](#) for providing content provenance and authenticity, which is available for public review and [feedback](#) through the end of November. This technical specification is designed to enable global, opt-in adoption of digital provenance techniques while meeting appropriate security requirements, which we hope will create a rich ecosystem of higher-integrity digital content where providing this kind of information becomes the norm. The potential of the technology has already been recognised by the **UK Centre for Data Ethics and Innovation** in their August 2021 report on [The role of AI in addressing misinformation on social media platforms](#).

It is our firm belief that the draft Online Safety Bill could go much further in underlining the importance of provenance standards in helping to address the challenges of disinformation, misinformation and inauthentic content. The work of the C2PA is showing real momentum, with the expectation of a 1.0 specification release in early 2022. This matters because with widely adopted standards and open systems, available to all, we can make sure organisations and products across the internet are working together to make the digital world more open, safe and trustworthy. The Online Safety Bill and Ofcom could ensure this open standard to be used as a technical solution to tackle disinformation.

Provenance technology is an important way to tackle misinformation in the long term and to empower consumers to interrogate the content they view online. We would welcome more focus on this important innovation in the forthcoming Online Safety Bill, alongside the

media literacy provisions which are crucial for increasing awareness and adoption of use of provenance in digital media.

Learning from international examples

We believe that a provenance solution to misinformation will work best through broad adoption and consumer education, and we would encourage the Committee to look to best practice examples of how legislators have sought to promote opt-in provenance standards and media literacy campaigns in other jurisdictions.

A good example to look to is the recent EU revised [Code of Practice on Disinformation](#), which the European Commission this year proposed should be expanded to include provenance standards in addition to the existing focus on detection. In itself, the EU revised code took its lead from the [Australian Code of Practice on Disinformation and Misinformation](#), whereby tech companies signed a code to provide safeguards against disinformation and to take steps to empower users to make informed choices around digital content.

Our recommendations

While we welcome the existing language in Part IV: Chapter 8 of the draft Online Safety Bill around the role of technology in improving the media literacy of consumers, we believe the importance of provenance standards in particular should be spelt out more clearly in the text of the Bill in line with these stronger international examples.

A logical amendment would be for the Bill to state that Ofcom should, as part of its proposed new media literacy duties, work to promote particular provenance standards and to encourage the adoption of these among Ofcom's regulated entities.

While the draft Online Safety Bill is of course at an early stage, we call on the pre-legislative scrutiny Committee to be as ambitious as possible in its recommendations as to how the legislation can be strengthened. The C2PA's development of a technical specification means the technology to implement an open provenance standard is almost a reality, and we believe the draft legislation should be updated to reflect this.

Working together to empower consumers and creators

Our coalition is made up of a diverse group of tech and media organisations and businesses, with different histories, perspectives and expertise. However, we are united in our view that as artificial and synthetic content becomes ever more pervasive across all forms of media, policymakers and legislators should take steps to ensure consumers have the tools they need to discern between authentic and inauthentic content, all the while protecting the freedom of expression of the creators.

The Online Safety Bill will set the regulatory direction of travel of the UK digital media landscape for many years to come, and we believe this is an opportunity that should not be missed to firmly embed the importance of provenance standards in tackling disinformation and empowering digital consumers.

If it would be of use, we would be happy to meet with you and the wider Committee membership to discuss these points in further detail, but otherwise we remain available to answer any further questions you might have in the meantime.

Kind regards,

The Coalition for Content Provenance and Authenticity

2 December 2021

