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April 8, 2024

Mr. Mark Zuckerberg  
CEO, Meta Platforms, Inc.  
One Hacker Way  
Menlo Park, CA 94025

## Re: Meta's Family of Apps on the 2024 Dirty Dozen List for failing to sufficiently address rampant sexual abuse and exploitation despite explicit knowledge of these harms

Dear Mr. Zuckerberg:

We are writing to advise that Meta has been named to the National Center on Sexual Exploitation's Annual Dirty Dozen List, which will be publicly released on Wednesday, April 10, 2024. We are placing Meta on this list of mainstream contributors to sexual abuse and exploitation for persistently failing to institute substantive policies and practices to prevent the many crimes, harms, and risks on your platform despite having extensive internal and external knowledge of such harms.

Meta's Family of Apps, with [nearly four billion users](#) (3.98 billion),<sup>1</sup> [exceeds the combined population of the world's top five most populous countries](#)—China, India, the United States, Indonesia, and Pakistan—which together sum up to approximately 3.6 billion people.<sup>2</sup> It's clear that Meta's impact and the implications of its policies hold significant weight, impacting **billions**.

Meta's unparalleled resources, cutting-edge technology, and global influence uniquely empower it to be a leader in online safety, capable of setting industry standards for all other online platforms. Unfortunately, this is *not* the path Meta has chosen. Meta's platforms – Facebook, Messenger, Instagram, and WhatsApp – have consistently been ranked for years as *the top* hotspots for a host of crimes and harms: [pedophile networks sharing child sex abuse material](#),<sup>3</sup> [where CSAM offenders first contact children](#),<sup>4</sup> [exploitative algorithms promoting children to adults](#),<sup>5</sup> [sex trafficking](#),<sup>6</sup> [sextortion](#),<sup>7</sup> and [image-based sexual abuse](#).<sup>8</sup>

A flood of evidence in the past year alone from whistleblower testimonies,<sup>9</sup> [unredacted lawsuits](#),<sup>10</sup> Congressional hearings, and slew

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of damning headlines and [leaked documents](#),<sup>11</sup> has confirmed the suspicions of many: Mark Zuckerberg and Meta leadership have a very long track record of explicitly making the choice to **not** rectify harms they know their platforms are both causing and perpetuating on children, or only doing so when forced by public pressure, bad press, or Congressional hearings.

While NCOSE acknowledges Meta's recent [safety updates](#),<sup>12</sup> these represent a grossly insufficient response to long-standing advocacy efforts, failing to mitigate the platform's rampant harms, particularly endangering children and vulnerable adults. Alarming, amidst [multiple cases<sup>13</sup> of 16-17-year-olds dying by suicide](#)<sup>14</sup> linked to Instagram sexual extortion schemes, Meta [refuses to provide 16-17-year-olds with the same life-saving features awarded to 13-15-year-olds](#), such as blocking unconnected accounts from messaging minors.<sup>15</sup>

The following reports from researchers and child online safety organizations demonstrate the wide-ranging sexual exploitation occurring across Meta's platforms:

- ⇒ **Instagram is the only platform listed in [top 5 worst in every single one of Bark's Annual Report categories for the second year in a row](#)**: severe sexual content, severe suicidal ideation, depression, body image concerns, severe bullying, hate speech, severe violence (Bark 2023 Annual Report).<sup>16</sup>
- ⇒ [Instagram is the #2 platform for the highest rates of sextortion](#) (Instagram 41% and Snapchat 42%, roughly 80% of reports mention Instagram or Snapchat – Canadian Centre for Child Protection, November 2023).<sup>17</sup>
- ⇒ [Facebook is the #1 parent-reported platform for sexually explicit requests to children; Instagram named #2](#) (Parents Together, 2023).<sup>18</sup>
- ⇒ [Instagram is the #1 social media platform](#) where CSAM offenders reported finding and sharing CSAM; Facebook is in the top 5 (Suojellaan Lapsia, Protect Children, February 2024).<sup>19</sup>
- ⇒ [WhatsApp is the #2 most popular messaging app](#) used by offenders to find and share CSAM and #2 messaging app used by CSAM offenders to attempt to establish first contact with a child (Suojellaan Lapsia, Protect Children, February 2024).<sup>20</sup>
- ⇒ [Instagram \(#1\) and Facebook \(#2\) are the top two social media platforms](#) used by CSAM offenders to attempt to establish first contact with a child (Suojellaan Lapsia, Protect Children, February 2024).<sup>21</sup>
- ⇒ **Facebook** (9%), **Instagram** (8%), and **Messenger** (9%) are all among the top 5 platforms where [minors reported having an online sexual interaction with someone they believed to be an adult](#) (Thorn, November 2023).<sup>22</sup>
- ⇒ **Meta-owned Facebook** (13%), **Instagram** (13%), and **Messenger** (13%) tied as the [#2 platform where most minors reported having an online sexual experience](#).<sup>23</sup> **Facebook** is in the [top five platforms with the highest rates of online sexual interactions](#) among minor platform users, tied with X at 19% (Thorn, November 2023).<sup>24</sup>

Amidst revelation after revelation of known harms, instead of dedicating its limitless resources to substantive changes that would truly protect children (as well as adult users), **Meta instead made the devastating decision to move to end-to-end encryption (E2EE) – effectively blinding itself to [literally tens of millions of cases of child sex abuse and exploitation](#), image-based sexual abuse, and any other criminal activity.**<sup>25</sup>

*Meta made the move to E2EE despite internal research and communications showing that...*

- ⇒ [Over one-quarter \(28%\) of minors on Instagram](#) received message requests from adults they **did not follow**, indicating a significant risk of unwanted or potentially harmful contact (2020).<sup>26</sup>
- ⇒ In a [July 2020 internal chat](#), one employee asked, “What specifically are we doing for child grooming (something I just heard about that is happening a lot on TikTok)?” The response from another employee was, “**Somewhere between zero and negligible. Child safety is an explicit non-goal this half.**”<sup>27</sup>
- ⇒ Meta’s internal research found that the feature ‘People You May Know (PYMK)’ contributed to [75% of cases involving inappropriate adult-minor contact](#) (2021).<sup>28</sup>
- ⇒ The majority of Instagram users [under the age of 13 lie about their age to gain access to the platform](#), highlighting the risk of depending solely on a user’s stated age. As shown by Meta’s internal research, “[s]tated age only identifies 47% of minors on [Instagram]...” Moreover, “**99% of disabled groomers do not state their age...The lack of stated age is strongly correlated to IIC [inappropriate interactions with children] violators.**” (2021).<sup>29</sup>
- ⇒ [One out of every eight users under the age of 16](#) reported experiencing unwanted sexual advances on Instagram in last seven days (2021).<sup>30</sup>
- ⇒ Roughly [100,000 children per day](#) received online sexual harassment, such as pictures of adult genitalia (2021).<sup>31</sup>
- ⇒ [Disappearing messages](#) (secret chats that are encrypted) were listed as one of the “immediate product vulnerabilities” that could harm children, because of the difficulty reporting disappearing videos and confirmation that safeguards available on Facebook were not always present on Instagram.” Instagram Direct and Facebook Messenger STILL do not have a clear-cut option to report CSAM or unwanted sexual messages (2020).<sup>32</sup>

NCOSE, along with numerous other child online safety organizations, strongly oppose Meta’s shift to End-to-End Encryption (E2EE), as it effectively ends Meta’s ability to proactively detect and remove CSAM across all areas of its platforms. [See our compiled document of global child safety leaders’ statements on Meta’s move to E2EE.](#)<sup>33</sup>

**Since October 2023, attorneys general in all 50 states have taken action to hold Meta accountable. AGs from 42 states have taken legal action to sue Meta across 12 lawsuits for perpetuating harm to minors, while attorneys general from 26 states sent a joint letter to demand that Meta cease monetizing child exploitation. Congress has also called Meta to account for its permissiveness and perpetuation of harm to minor-aged users, and dozens of child safety activists have decried Meta’s move to E2EE.**

To make matters even worse, Meta’s [decisions](#) around AI technologies<sup>34</sup> are facilitating the creation and dissemination of deepfake pornography, “nudifying” tools, and [sexually explicit chat bots – some of which have been made to imitate minors.](#)<sup>35</sup>

Ads and profiles for individuals and groups promoting these forms of abuse are [commonplace](#) across Meta platforms.<sup>36</sup> And despite repeated stories of [sexual assault and gang rape](#) in Meta’s “Horizon Worlds” virtual reality game,<sup>37</sup> Meta opened it up to teens 13-17-years-old.

Meta’s historic negligence in moderating its platform, particularly in cases of child sexual abuse material (CSAM), image-based sexual abuse (IBSA), and sexual extortion, raises concerns about potentially training their image generator on abusive content.

Despite Meta’s [promise of fair and responsible](#) AI systems,<sup>38</sup> Meta AI is riddled with abuse and exploitation:

- Meta released the “[Imagine with Meta AI](#)” website<sup>39</sup> in December 2023, using 1.1 billion publicly visible Facebook and Instagram images to [train the AI model](#).<sup>40</sup>
- Recent news articles documented Meta’s reluctance to moderate its platform for cases of [image-based sexual abuse](#) and synthetic sexually explicit media (SSEM).<sup>41</sup>
- For instance, a 2023 NBC article revealed that Facebook [ran hundreds of deepfake pornography ads](#) despite its policies against such content.<sup>42</sup>
- NCOSE researchers easily found ads, profiles, and groups promoting “nudifying” bots and deepfake pornography on Meta platforms, including Meta’s ad library.

The absence of adequate safety measures, coupled with a clear disregard for enhancing online safety, portrays Meta as a behemoth that has strayed from its path. Akin to a runaway train without guardrails, Meta’s motto of “moving fast and breaking things” has been taken to a quite literal level. **Meta is, by all accounts, broken.**

Meta’s extensive shortcomings and their consequences are thoroughly documented and undeniable. The awareness of the harm being inflicted, along with the steps needed to address it, is apparent, yet Meta chooses inaction every time. NCOSE has provided Meta’s team with comprehensive evidence, both written and verbal, shared our expertise and findings, critically examined policies and products for vulnerabilities, inconsistencies, and gaps, and voiced the concerns of caregivers and children. We have even offered to facilitate connections between Meta and both young survivors and law enforcement, an offer that Meta has consistently declined. Our collaboration with Meta teams was initiated in the sincere hope of witnessing substantial changes. Regrettably, this hope has now dissipated.

The relentless pursuit of advancement, regardless of the consequences, has led to a suite of applications marred by flawed policies, ineffective practices, and a disregard for ethical considerations. The constant stream of excuses, deceit, and ongoing neglect is not only unbearable but should, by any reasonable standard, be deemed utterly unacceptable. This behavior represents a clear abdication of responsibility and a profound failure to uphold basic standards of decency and accountability.

### **The National Center on Sexual Exploitation calls on Meta to:**

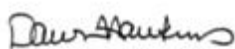
1. **Re-configure Encryption Approaches to Protect Children and Adult Victims** – including at the bare minimum implementing client-side detection for CSAM across all end-to-end encrypted spaces on Meta platforms to ensure that exploitation material is detected and reported.<sup>1</sup>

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<sup>1</sup> Conduct client-side detection of any sexually explicit materials of adults to reduce adult image-based sexual abuse; client-side scanning for indicators that could indicate pedophile networking or link sharing of CSAM repositories, and remove encryption measures on any minor-aged account and implement proactive grooming and sexual abuse detection. It cannot be overstated that if Meta truly prioritizes safety, it will reverse E2EE and work with the child safety community to create a system that truly balances online safety and privacy instead of sacrificing safety, which is what Meta is currently doing.

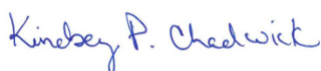
2. Revise the definition of “teen” to encompass all minors 13-17 and **ensure *all* available privacy and safety features are defaulted to the highest level and apply to *all* teens 13 – 17 across *all* Meta platforms.** (Note: NCOSE believes that Meta platforms have been proven so unsafe for children, they should be a 17+ app)
3. **Set all minor-aged accounts’ “followers” and “following” lists to “*always remain private*,”** and provide adults (18+) the option to keep “followers” and “following” lists private, similar to Facebook to prevent sextortion and image-based sexual abuse.
4. **Ban and remove all “nudifying” bots, profiles, and ads** within the Meta library and across all Meta platforms and products.
5. **Require all Meta AI products to undergo robust red teaming efforts with child safety experts and organizations** to rigorously test and identify vulnerabilities in AI systems, ensuring they are resilient against misuse and effectively safeguard children’s privacy and well-being.

Thank you for your attention,



Dawn Hawkins

CEO



Kindsey P. Chadwick

Interim President

Cc:

Nick Clegg, President of Global Affairs

Adam Mosseri, CEO and Head of Instagram

Will Cathcart, Head of WhatsApp

Tom Alison, Head of Facebook

Loredana Crisan, Head of Messenger

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<sup>1</sup> Meta Investor Relations, “Meta Reports Fourth Quarter and Full Year 2023 Results; Initiates Quarterly Dividend,” news release, February 1, 2024, <https://investor.fb.com/investor-news/press-release-details/2024/Meta-Reports-Fourth-Quarter-and-Full-Year-2023-Results-Initiates-Quarterly-Dividend/default.aspx>.

<sup>2</sup> “Total Population by Country,” World Population Review, accessed April 4, 2024, <https://worldpopulationreview.com/countries>.

<sup>3</sup> Jeff Horwitz and Katherine Blunt, “Instagram Connects Vast Pedophile Network,” *The Wall Street Journal*, June 7, 2023, <https://www.wsj.com/articles/instagram-vast-pedophile-network-4ab7189?mod=djem10point>.

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