



COMMENTS TO META OVERSIGHT BOARD

Alleged Audio Calls to Rig Elections in Iraqi
Kurdistan

March, 2025

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OVERSIGHT BOARD'S CALL FOR PUBLIC COMMENTS

(Released February 27, 2025)

Barely a week before the parliamentary elections in the Kurdistan Region of Iraq, a post by a local media outlet surfaced on Facebook. It consisted of an alleged audio call between the President and Deputy Prime Minister of the Patriotic Union of Kurdistan planning to rig the upcoming elections. The media outlet that made this post was said to have been affiliated with the Kurdistan Democratic Party, the rival political party in the region, and as per Meta's external consultation, the post itself was likely to be digitally created. Under these circumstances where the post could potentially influence the election results, a user reported it under Meta's Misinformation Community Standards. However, Meta neither took down the post from Facebook nor labelled it as digitally created in the fear of creating false positives.

The Oversight Board selected this case to address the issue of moderating possibly false information and likely manipulated media in the context of elections. Public comments were invited to provide insights on:

- (i) The sociopolitical context in Iraqi Kurdistan, particularly around the October 2024 elections and the role that misinformation, propaganda and manipulated media played.
- (ii) The relationship of media institutions in Iraqi Kurdistan with politicians and political parties.
- (iii) The impact of manipulated and misleading content in Iraq and more broadly on access to information and participation in public life.
- (iv) The risks of over-enforcement on alleged manipulated media and the potential negative impacts on the free expression rights of speakers and listeners.
- (v) Effective approaches to addressing the harms from manipulated media in the context of elections.

The Comments contributed by CASCA strive to help Meta better understand this scenario concerning the unique socio-political setup of the region and ensure that such mechanisms are adopted, that the importance of social media as a platform for dissemination of news is not compromised, but at the same time, the threat of manipulated information can be kept at bay. The original Call for Public Comments can be accessed [here](#).

COMMENTS TO OVERSIGHT BOARD

1. The relationship of media institutions in Iraqi Kurdistan with politicians and political parties.

The present case stems from the online dissemination of manipulated information perpetuated by the close ties media outlets have with the political players in the Kurdistan Region of Iraq (KRI). Since the foundation of the Kurdistan Regional Government (KRG) in 1991, Kurdish media institutions have been predominantly characterised by the backing of political players. These partisan media outlets are directly affiliated with a political party - most commonly Kurdistan Democratic Party (KDP) or Patriotic Union of Kurdistan (PUK) but any other political party as well. This became more pronounced in the 2010s when ruling political parties began investing heavily in media corporations and systematically sidelining independent media houses¹.

Among popular television, KurdSat is owned by PUK while their political rival, KDP owns Kurdistan Satellite TV while KNN is owned by the Change Movement². Party ownership extends to news websites and newspaper presses as well. Popularly sought-after media sites Xendan and Bas News are under PUK and KDP respectively while the same two political parties also own the regional newspapers, Kurdistan Nuwe and Khabat. Rudaw, a broadcasting and digital news network in KRI claims to be a private station, however, it is widely believed to be affiliated with President Nechirvan Barzani of KDP, further leading to allegations of it getting 30 million dollars from government oil revenues to set up a new TV station³. The allegation of political affiliation was strengthened when Rudaw was excluded from a government's budget cut for the media outlets despite having the highest budgets amongst media houses in the region. However, another element setting apart Rudaw's alleged political affiliation is the fact that, although its affiliations lie with KDP, even under a PUK government, it was granted an unexplained exemption from the budget cut⁴.

Further, it has been noted that KDP, and PUK which are the most dominant political parties in the region give priority access to media outlets owned by them. Under KDP, Kurdistan Television, Rudaw and K24 had access to all public places and information, while under PUK domination, Kurdsat News and GK TV enjoyed similar

¹ Renwar Najm, "The Decline of Independent Media in Kurdistan Region" (*Centre for Strategic and Contemporary Research*, August 27, 2024) <<https://cscr.pk/explore/themes/social-issues/the-decline-of-independent-media-in-kurdistan-region/>>.

² BBC News, "Iraqi Kurdistan Profile - Media" (*BBC News*, July 8, 2014) <<https://www.bbc.com/news/world-middle-east-28211544>>.

³ "Nechirvan Barzani's Association with Media Corruption | CHMK" <<https://chmk.org/nechirvan-barzanis-association-with-media-corruption/>>.

⁴ Editor, "Nechirvan Barzani's Association with Media Corruption ... the Rudaw Company as an Example" (*The Kurdistan Tribune*, June 4, 2012) <<https://kurdistantribune.com/nechirvan-barzanis-association-media-corruption-rudaw-company-as-example/>>.

privileges⁵. This aligns with the political culture of the KRI, where civil society and the state are relatively weak compared to the political parties. The KDP and the PUK, in particular, exert a high degree of influence over the institutions that make up civic life. The system of partisan media creates an askew picture of the events and issues of the region. Neither KRI citizens get access to impartial information about local governance and politics, nor do foreign observers become aware of the actual happenings since most publicly available news comes through a partisan filter⁶. Thus, the presence of independent media houses and journalists becomes imperative.

Private media houses and journalists operating independently are not completely absent. However, pervasive corruption⁷ requires them to either report the news as desired by the political parties or suffer repercussions⁸, since the system protects its vested interests and punishes those who challenge it. This, accompanied by the socio-political landscape of KRI creates a plausible ground for the dissemination of polarized information. Novel technology fueled by AI-Generated deepfakes, further perpetuates such dissemination on social media and similar online portals. The problems get exacerbated owing to the difficulty in differentiating between human and AI-generated content, thus, dramatically increasing the reach and impact of manipulated operations by enabling wrongdoers to automate and scale them.

2. The sociopolitical context in Iraqi Kurdistan, particularly around the October 2024 elections and the role that misinformation, propaganda and manipulated media played.

KRI approached a pivotal parliamentary election on October 20, 2024—a vote that had been postponed multiple times since 2022. This election represented a critical juncture for the Kurdish populace and their elected officials, who were contending with political, economic, and social challenges.⁹

⁵“Partisan Press: The Dominance of Party-Backed Media in Iraq’s Kurdistan Region” (*Middle East Institute*) <<https://mei.edu/publications/partisan-press-dominance-party-backed-media-iraqs-kurdistan-region>>.

⁶ “Kurdistan Region: A Beacon of Media Freedom and Journalistic Excellence” (*Kurdistan Regional Government*, November 23, 2023) <<https://gov.krd/dmi-en/activities/news-and-press-releases/2023/november/kurdistan-region-a-beacon-of-media-freedom-and-journalistic-excellence/>>.

⁷ “Kurdistan Region: A Beacon of Media Freedom and Journalistic Excellence” (*Kurdistan Regional Government*, November 23, 2023) <<https://gov.krd/dmi-en/activities/news-and-press-releases/2023/november/kurdistan-region-a-beacon-of-media-freedom-and-journalistic-excellence/>>.

⁸ Belkis Wille, “We Might Call You in at Any Time” (2023) <<https://www.hrw.org/report/2020/06/15/we-might-call-you-any-time/free-speech-under-threat-iraq>>.

⁹ Nickolay Mladenov, “Kurdistan’s Pivotal Elections: A Defining Moment for the Region’s Future” (The Washington Institute, 21 Oct, 2024) <<https://www.washingtoninstitute.org/policy-analysis/kurdistans-pivotal-elections-defining-moment-regions-future>>

In May 2023, the Federal Supreme Court declared the one-year extension of the Kurdistan region's parliament term in 2022 unlawful¹⁰, citing its negative impact on Iraqi democracy. The ruling dissolved the regional parliament, and the caretaker government assumed control. Several provisions including Article 9 of the Kurdistan Parliament Election Law of 1992 were deemed unconstitutional, with the region divided into four electoral constituencies. The court also ruled the extra seats for minorities as illegal¹¹, reducing the parliament to 100 seats from 111. Although the KDP received twice the number of votes as the PUK, it ultimately saw a reduction of five seats following the ruling by the Iraqi Federal Supreme Court.¹² The campaign's tone and themes differed from past elections, as the PUK and the KDP, traditionally rivals against opposition or government forces, now competed directly.¹³ This shift reflected internal changes within the two main parties. On February 15, 2025, under President Masoud Barzani's leadership, the KDP's Central Committee convened to discuss internal dynamics and strategic directions. The meeting addressed regional and international issues, emphasizing the need to adapt to evolving political situations.¹⁴ The PUK also internally transformed with the emergence of new leadership. They tried to remold the party to appeal to a wider electorate, emphasizing reform and institution-building to consolidate the PUK political base.¹⁵ Amid times of political turmoil, Erbil (Hewlêr) citizens and the rest of the area cast their ballots to make their voices heard. The elections were pivotal in shaping the political trajectory of the region, with potential implications for the broader Middle East. They reflected the aspirations of the Kurdish people toward building a prosperous and democratic state.¹⁶ The internal changes within both parties significantly influenced the electoral landscape. The KDP secured 39 out of 100 parliamentary seats, while the PUK obtained 23 seats.¹⁷

¹⁰“Iraqi Kurdistan 2022 Parliament Extension Unconstitutional, Supreme Court Rules” (Reuters, May 30, 2023) <<https://www.reuters.com/world/middle-east/iraqi-kurdistan-parliaments-2022-term-extension-unconstitutional-supreme-court-2023-05-30/>>

¹¹ Menmy DT, “Iraq’s Top Court Revokes Minority Quota Seats in Kurdistan” *The New Arab* <<https://www.newarab.com/news/iraqs-top-court-revokes-minority-quota-seats-kurdistan>>

¹² Wladimir van Wilgenburg, “A Stalemate in Kurdistan” (*Carnegie Endowment for International Peace*) <<https://carnegieendowment.org/middle-east/diwan/2024/10/a-stalemate-in-kurdistan?lang=en>>

¹³ Sardar Aziz, “Iraqi Kurdistan faces a crucial parliamentary election” (CFRI, 9 Oct, 2024) <<https://www.cfri-irak.com/en/article/iraqi-kurdistan-faces-a-crucial-parliamentary-election-2024-10-09>>

¹⁴ Z. Bawany, “Substantial Progress Has Been Achieved in Reaching Common Ground, Particularly in Discussions with the Patriotic Union of Kurdistan (PUK) Regarding the Formation of the next Government Cabinet. | Foreign Relations - Kurdistan Democratic Part, KDP” <<https://www.kdp-fro.krd/en/article/5829>>

¹⁵ Holly Dagres, “The Kurdistan Region of Iraq Is Finally Having Its Election. Here’s How It’ll Play out. - Atlantic Council” (*Atlantic Council*, October 18, 2024) <<https://www.atlanticcouncil.org/blogs/menasource/kurdistan-iraq-puk-kdp-elections/>>

¹⁶ Saya B, “PANORAMA 2024 | Elections Turmoil in Kurdistan Region of Iraq” (*Medya News*, December 30, 2024) <<https://medyanews.net/panorama-2024-elections-turmoil-in-kurdistan-region-of-iraq>>

¹⁷ “KDP Wins Iraqi Kurdish Parliamentary Election, Commission Says” (Reuters, October 30, 2024) <<https://www.reuters.com/world/middle-east/kdp-wins-iraqi-kurdish-parliamentary-election-commission-says-2024-10-30/>>

The onset of political propaganda by way of shadow media preceded the actual election campaign in KRI. The dominance of partisan media in the information sphere played a substantial role in deciding voter choice in the recent election since it conveniently allowed political parties to disseminate manipulated information across media platforms and print. Especially on social media, this was exacerbated through AI assistance in generating manipulated content such as the post in the present case. A post alleged that an opposition leader asked that a military commander get soldiers to burn his house as a guide to win people's sympathy. It was one of the attack pages that hailed KRG Deputy Prime Minister Qubad Talabani as a "symphony of tranquility in the noisy forum of politics." Another of the attack pages said he was scheming to "humiliate" part of his party and blame them if his party lost an election. According to Dr. Harem Karem of the Pasewan Organization for Public Policy, "Shadow media has a profound impact on the information landscape of the Kurdistan Region. These outlets erode the already shaky trust in public institutions and sow discord in society." It is clear that the region's shadow media, a pervasive presence in the information landscape, has a malignant impact both in broad societal terms and for specific individuals and communities.¹⁸

3. The impact of manipulated and misleading content in Iraq and more broadly on access to information and participation in public life.

Misinformation and Misleading information can sway public opinion and weaken democratic institutions. Radical movements and parties can employ manipulative and misleading content to rally supporters against mainstream parties and media. Thus, it becomes imperative to maintain the media outlets free from such bias and strengthen democracy.

Iraq was not always a place of misinformation and misleading content as it is today. Iraq's media ecosystem has rapidly expanded since the early 2000s, diversifying information sources and ushering in a new era of digital propaganda.¹⁹ Following the US military intervention and the fall of Baghdad on April 9, 2003, Iraqi media changed dramatically from Saddam Hussein's tightly controlled machinery to a battleground of propaganda. Before US intervention, the Baathist dictatorship had only two main TV outlets: Al-Iraqiya and Iraqi News Agency. The Iraqi Baathist leadership maintained strict control over both the outlets. In 2023, Iraq had over 100 privately held media entities, including radio stations and digital sites. The new media environment

¹⁸“Ahead of Elections, Iraqi Kurdistan’s ‘Shadow Media’ Ramps Up” (*Inkstick*, August 28, 2024) <<https://inkstickmedia.com/ahead-of-elections-iraqi-kurdistans-shadow-media-ramps-up/>>

¹⁹Aida Al-Kaisy, ‘DISINFORMATION in IRAQI MEDIA’ (2021) 55 LSE Middle East Centre Paper Series | <http://eprints.lse.ac.uk/112476/1/MEC_paper_55_disinformation_in_the_iraqi_media.pdf> accessed 13 March 2025.

significantly shifted from the previous regime's strict censorship. Iraqi citizens now have access to a diverse selection of private and international media outlets, in addition to state-run ones. Iraq's freedom of expression continues to decline. Iraq dropped from 163 to 172 out of 180 nations in the 2022 Reporters Without Borders World Press Freedom Index.²⁰ An example of media control would be how Iraq suspended Saudi-backed media outlet *MBC Media Group* for calling former leaders of Hamas, Hezbollah and Iran's Qud Forces as "faces of terrorism".²¹

Iraq continues to struggle with deceptive media that aims to further its narrative. The Iraqi public is often a victim of this crossfire of misinformation that exists in the country. News organizations tend to target the Sunni population (which is a minority group in Iraq) and international powers. This pattern of manipulated and misleading content has disrupted political activities and elections. The media organization called Al-Ahad TV is controlled by the paramilitary group Asa'ib Ahl Al-Haq, which has a history of human rights violations. From 2019 to 2021, the Iraqi government was primarily targeted due to its close relationship with the US. Al-Ahad frequently spread misinformation and misleading content about the Iraqi government and former Prime Minister Mustafa Al-Kadhimi. Secondly, the media outlet spread misinformation about UNAMI and other international stakeholders. The news organization claimed that the UN manipulated the election with Mustafa Al-Kadhimi's cooperation, blaming UN Iraq's special envoy Jeannine Plasscheart for the fraud.

In July 2020, al-Kadhimi, former Prime Minister of Iraq, declared that national elections would be held on June 6, 2021, a year earlier than the scheduled May 2022 date. This decision received considerable public support. On January 19, 2021, the elections were postponed after speculation for several days. News organizations, politicians, and key politicians spread the narrative online that the elections are delayed because of external forces such as the United Nations and the USA. Moreover, they claimed Al-Khadimi did not seek to conduct the elections earlier and it was merely a ploy to subdue protestors. The government had produced evident reasons, citing technical and logistical reasons for the delay. At the same time, the critics failed to provide any material that was more cogent than assumptions and misleading content. The escalation of misinformation led to civilian clashes with Iraqi forces that resulted in fatalities and even drone strikes on the former PM Al-Khadhimi.

²⁰ Reporters Without Borders, '2023 World Press Freedom Index – Journalism Threatened by Fake Content Industry | RSF' (rf.org2023) <<https://rsf.org/en/2023-world-press-freedom-index-journalism-threatened-fake-content-industry>>.

²¹ Alissa J Rubin, 'Iraq Suspends the Saudi-Owned MBC Channel after Protesters Storm Office' *The New York Times* (19 October 2024) <<https://www.nytimes.com/2024/10/19/world/middleeast/iraq-iran-mbc-media-group.html>>.

In Iraq's 2018 national election, 'deepfakes', or synthetically-generated videos, were used to attack candidates, especially women, and deter them from standing for elections. Dr Intidhar Jassim, a member of former Prime Minister Haider al-Abadi's Victory Alliance, had to abandon her candidacy due to a fake sex tape being circulated online.²² On the other hand, the demography of Sunni Muslims, which constitutes 30-35% of Muslims, faces discrimination and political restrictions. E.g., in the October 2005 constitutional referendum, all Sunni-majority regions voted against the new constitution, highlighting Sunni alienation. Sunni perceptions of the new Iraq were dominated by a narrative of sectarian victimization, fueled by discriminatory policies implemented by Nouri al-Maliki's authority (2006-2014), including the persecution of Sunni leaders with terrorism charges, mass arrests of Sunni citizens, and biased implementation of anti-Sunni Arab narratives²³.

This sectarian division promotes identity politics, with Sunni and Shia factions mobilising around radical ideologies. This fragmentation undermines national unity, marginalizes Sunni representation, and leads to distrust in government. Electoral procedures have become battlegrounds for sectarian supremacy, escalating exclusion and political instability among Sunni populations.

4. The risks of over-enforcement of alleged manipulated media and the potential negative impacts on the free expression rights of speakers and listeners.

While the discourse on the impact and recommendations for addressing the harms from manipulated media is essential, as seen in the recent incident involving a fake audio call about rigging elections, it is also crucial to note the risks associated with over-enforcing such measures before proceeding.

A significant risk involved while acting on allegedly manipulated media is that of political bias and manipulation, Iraqi Kurdistan already has a politically polarized media landscape, with most outlets being on the different sides of the political spectrum and affiliated with either KDP or The PUK (PUK) which are the major political parties in the region. The statutes and rules being too rigid could lead to the suppression of Investigative journalism and the ruling authorities could disproportionately target those that are critical of it. Egypt with a similar political landscape to Iraq has faced similar issues in the past. Ahead of the 2018 presidential election, The Egyptian

²² Naseem Tarawnah, 'Sextortion, Harassment, and Deepfakes: How Digital Weapons Are Being Used to Silence Women - IFEX' (IFEX5 March 2020) <<https://ifex.org/sextortion-harassment-and-deepfakes-how-digital-weapons-are-being-used-to-silence-women/>>.

²³ Mansour R, "The Sunni Predicament in Iraq" *Carnegie Endowment for International Peace* <<https://carnegieendowment.org/research/2016/03/the-sunni-predicament-in-iraq?lang=en¢er=middle-east>>.

government intensified efforts to combat the so-called “fake news”, leading to mass arrests of journalists and social media users who shared information questioning the election’s fairness.

The media outlet that posted the fake audio call between the current President of the PUK (PUK) party and his brother Qubad Talbani stated it merely shared the audio as part of their news coverage without offering any opinions or commentary on the content itself, rather they shared it only as a local news item. If such reports are removed under strict enforcement policies, it may discourage media from covering politically sensitive stories. In a region where trust in institutions is already fragile, excessive moderation could be seen as external interference in local politics further deepening divisions. Major political actors or influential figureheads could also exploit the rules and pressure platforms to suppress content under the guise of combating such media to manipulate public discourse, suppress dissent and shape political narratives in their favour. Media outlets play a crucial role in informing the public, and if strict policies lead to frequent content removals, it may limit their ability to function freely. In February 2019, when the then President of Algeria Abdelaziz Bouteflika announced to run for a fifth term, millions of Algerians started protesting against the government in what was known as the Hirak movement. The Algerian authorities started framing journalism and protest coverage as “spreading fake news” and began blocking independent news websites and arresting hundreds of activists, accusing them of spreading false information about government corruption and human right abuses.

Over-moderation of content could also have a chilling effect on free speech. If Journalists start believing that they could be penalized for going against the mainstream narrative, they would start holding back opinions, avoiding controversial topics, and deflecting from prominent issues to protect themselves. Meta itself has been guilty of this in the past, when an Instagram video of a Lebanese activist making humorous remarks about the Secretary-General of Hezbollah, Hassan Nasrallah, during an interview to communicate his disapproval of the political leader was removed it for violating the Dangerous Organizations and Individuals policy, as laid out in the Facebook Community Standards²⁴. Finally, the video was reinstated after further review by the Oversight board. Harsh enforcement of rules and regulations on media content can also harm discourse as well as public debate. Conclusively, it is clear that a holistic and nuanced approach is required when drafting codes and statutes for regulating media content and addressing actions on allegedly manipulated media.

5. Recommendations

²⁴ ‘Dangerous Organizations and Individuals’, (Transparency Center, 13 March 2025)<<https://transparency.meta.com/policies/community-standards/dangerous-individuals-organizations>>

The major issue in the Iraqi media scenario is the overarching powers of players such as the government or the opposition that peddle their narrative. The key recommendation here is to establish self-regulatory organizations (SRO). Meta can establish SRO while working with concerned stakeholders, a similar approach had been applied by Meta in India where the Misinformation Combat Alliance (MCA) and other independent organizations worked together. These SROs will identify false and misleading content online that may lead to adverse consequences²⁵. They shall comprise independent media networks that are not politically funded and will act independently of the government and the organizations that sponsor them. While Meta has abolished Fact-Checking Units, an external news verification organization could be effective in addressing the crowdsourcing nature of community notes. Community notes use a crowdsourcing format, which may encourage a chaotic culture and may not be conducive to elections.

Meta needs to establish an approach to deal with issues accounting for the socio-political landscape of the region. In a socio-political setup such as that of KRI, which is characterized by high levels of political control over the information in circulation, Meta must create an effective internal mechanism to address the spread of manipulated news to curb the challenges arising from the same. In such a set-up featuring restricted freedom of independent journalists and rampant activities of shadow media, banking on government regulations will only be counter-productive and further limit the dissemination of reliable, unbiased information. Furthermore, Meta must uniformly implement such redressal mechanisms across regions with similar demography and socio-political setup to simultaneously reduce ambiguity, while ensuring that regional differences (social, political, demographical etc.) are accounted for.

The present case can be attributed to Meta's decision to neither flag nor take down the post in dispute. Hence, Meta must mandatorily enhance its mechanism to address misinformation and media manipulation powered by AI by implementing a sequential method to resolve issues. Here, posts reported under the Misinformation Community Standard shall be compulsorily flagged as *potential fake* while those AI generated carry a similar flagging. To alleviate the issue of false positives, removal of the post itself shall be kept on standby until verifiable information is obtained supporting either side through SROs. Meta could also increase resources allocated to similar regions marked with high politicization of information to assist them in identifying, verifying and removing manipulated content from public view.

²⁵ Aashish Aryan, 'Misinformation Combat Alliance Moots Multi-Stakeholder Consultative Approach to SRO' (*The Economic Times* 21 April 2023) <<https://economictimes.indiatimes.com/news/india/mca-moots-multi-stakeholder-consultative-approach-to-sro/articleshow/99676780.cms?from=mdr>>