

**ABC Submission on  
the ACCC issues paper on  
social media services**

**September 2022**



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## 1. Introduction

The Australian Broadcasting Corporation (ABC) welcomes the opportunity to respond to the Australian Competition and Consumer Commission (ACCC) issues paper “Digital Platform Services Inquiry – March 2023 Report on social media services”.

The ABC is Australia’s most trusted news organisation and Australia’s largest news publisher on several of the major social media platforms. The Corporation currently operates more than 200 social media channels across the major social platforms, covering a wide range of brands and genres, including ABC News, ABC Kids, triple j, ABC TV and ABC iview, local news and information, and specialist genres such as Indigenous, health, science and arts.

In this submission, the Corporation will confine itself to questions where it has direct experience of the role that social media services play in the national media landscape.

## 2. Responses to questions

*Question 4: Do particular events influence users’ use of social media services, for example, during natural disasters or the COVID-19 pandemic?*

The ABC has observed huge shifts in user behaviour throughout the various phases of the COVID-19 pandemic and recent natural disasters.

During the pandemic, Australian audiences became even more highly engaged with the ABC’s news content on social media, driven by live streams of daily COVID press conferences, national and local case updates and evolving public health advice, as well as other national and international news about the pandemic.

Similarly, through recent natural disasters, including the 2019–20 summer bushfires and the 2022 floods, engagement with the ABC’s news and emergency coverage on social media platforms was high.

The ABC also observed its content being shared and republished in other forums, including local community Facebook groups, as local audiences attempted to keep their communities informed. Disappointingly, there were also instances of targeted disinformation, trolling and harassment – most notably during the pandemic, where bad actors targeted ABC social media channels with spam messaging and harassment, and in some cases even used the social platforms to mobilise against ABC staff and offices in person.<sup>1</sup>

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<sup>1</sup> See e.g., Gould C (4 December 2021) “[‘Tell the truth’: Anti-vax protesters descend upon Melbourne for another day of demonstrations](#)”, *News.com.au*, accessed 5 September 2022; Smith T (27 October 2021), “[‘Bizarre moment anti-vaccine mandate protesters swarm ABC offices plastering the windows with flyers and claiming ‘the media is the virus’](#)”, *Daily Mail Australia*, accessed 5 September 2022.

Where the ABC was able to provide evidence of social platforms being used to coordinate malicious activity against ABC social media channels, staff and offices, the social media platforms were generally quick to remove the content and, in some cases, deactivate user accounts and groups.

*Question 8: To what extent do social media platforms compete with each other for users? How do social media platforms compete with each other?*

Social media platforms are in the attention business. They use content and utility value to attract, retain and engage users, while collecting data that allows them to sell targeted advertising solutions to businesses.

Social platforms compete for users by developing new product features designed to appeal to and attract new users or drive increased frequency and/or engagement time with existing users. They also develop features that are appealing to advertisers, such as targeted video advertising, which provides increased revenue streams to monetise user engagement.

Recent declines in Facebook weekly users driven by TikTok's rapid growth, and the subsequent drop in Meta's share price, illustrate the potential financial impact of this competition for users.

The competitive and fast-moving nature of these platforms can present challenges for organisations that depend on them to reach audiences or customers, as they need to frequently adjust their strategies and workflows to adapt to new product features and audience behaviours.

*Question 11: Are there any trends in consumer behaviour or preferences that may impact on competition in the future? If so, describe what they are.*

TikTok's rapid growth has demonstrated a clear audience appetite for algorithmically selected short-form vertical-video content. TikTok has exploited this behavioural trend to generate revenue at the expense of competitors. While platforms of the scale of Facebook, Instagram and YouTube can generally move quickly to develop competitive feature sets in response to a new arrival in the market, even they have struggled to limit the impact of TikTok on their businesses.

Huge first-party data sets, sophisticated algorithms and large-scale developer resources provide major social media platforms with a competitive advantage over the ABC and other digital media publishers. This can make it challenging for publishers to build direct relationships with their audiences.

*Question 27: Has the development of social networking features and related services by social media platforms led to new consumer harms and/or exacerbated existing consumer harms?*

Social platforms can be exploited by bad actors who use these services for misleading and deceptive conduct, including acting as imposters to scam unsuspecting Australians and spreading disinformation and misinformation.

The near-ubiquitous use of some social media platforms in Australia combined with the ease of sharing content on these platforms creates an environment that presents challenges when it comes to disinformation and misinformation. The ABC plays an active role in improving media literacy in Australia, including through programs and initiatives such as *Behind the News*, RMIT Factcheck, dispelling health misinformation on programs like *Coronacast* and the ABC Health Instagram account, media literacy resources for schools on ABC Education, and reaching young people with trusted and independent news on platforms like YouTube, Facebook, Instagram and TikTok.

The major social media platforms operate within the voluntary Australian Code of Practice on Misinformation and Disinformation. The Code was developed by industry association Digital Industry Group Inc (DIGI) following a request from the Australian Government in its response to the ACCC's Digital Platforms Inquiry.

The ABC engaged constructively with DIGI's recent review of the Code, providing feedback on areas where current strategies for managing these harms could be improved, including suggesting that the definition of "harm" be widened to include harm which erodes trust in public institutions and professional sources of information, presents threats to community cohesion; or creates public panic and social disruption. The ABC would welcome further strengthening of the Code. For example, over time, it would be beneficial for the Code to move from an opt-in to an opt-out model for the optional commitments it contains, as that would place greater onus on signatories to explain why a specific requirement is not relevant to their service and ensure they provide clear justification for the decision.

Unfortunately, social platforms are also used for trolling and harassment.

*Question 28: What impact has advertising on social media had on consumer engagement on social media? Has advertising on social media led to any specific consumer harms?*

There are several categories of consumer harms resulting from the growth of social media advertising. These include:

- Bad actors using social media platforms and advertising to mislead consumers with malicious intent, often resulting in real-world harm.
- The growth of the social media advertising industry has resulted in platform algorithms reducing organic (non-paid) social media reach. Many social platforms are increasingly becoming "pay to play" platforms, where small businesses, brands, artists and performers who have built substantial followings on these platforms over many years are now forced to advertise in order to reach a sizeable audience.
- Online advertising relies heavily on the use of personal information to target individuals, to optimise campaigns and to measure campaign effectiveness. This process has been ongoing for more than a decade. It means granular information about consumers has been shared with organisations such as Meta and Google and many other advertising and marketing technology providers by nearly every website or app that a person has visited in that time. This information is shared with the platforms regardless of whether the consumer is a user of the platform or not. The result is these organisations have accumulated vast amounts of information on each consumer. This presents a significant privacy risk for consumers and has resulted in consumer harms when this information has been used for inappropriate purposes, such as targeting users with misinformation, phishing attacks or unethical advertising.
- Most social media platforms use a technique called in-app browsing that displays links clicked on by users of their smartphone apps within the app itself, rather than transferring them to a browser.<sup>2</sup> This allows the social platforms to track users' activity on external websites that they do not own or control, including external sites that do not share information with them. As a result, consumers are tracked in

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<sup>2</sup> McKinnon G (22 August 2022) "[TikTok's in-app browser can monitor your keystrokes, including passwords and credit cards, researcher says](#)", ABC News, accessed 8 September 2022.

circumstances where they would not expect to be and organisations like the ABC have no control of what is tracked on their sites by the social platforms. In the case of TikTok, every user action on external sites is tracked, which has an effect similar to keystroke logging and could potentially be used to capture usernames and passwords.<sup>3</sup>

- As the major platforms are located overseas and do not offer local storage of personal information, Australian consumer information is widely shared around the world. This presents a security risk for consumers where their information could be shared with international government authorities where it is required to be by laws in that jurisdiction. For example, despite ByteDance's efforts to distance Australian TikTok from an association with China, it was recently revealed that Australian personal information collected via TikTok is accessible to engineers in China.<sup>4</sup>

There are also some positive impacts of social media advertising, including the emergence of the creator economy and the growth of the digital marketing industry and resulting job creation.

*Question 29: Are consumers faced with potentially misleading and/or deceptive claims through advertising on social media (including sponsored advertising or posts featuring influencers)? If so, has the incidence of potentially misleading and/or deceptive claims increased or decreased over time?*

The Corporation has experienced several incidents involving misleading and/or deceptive claims involving ABC content, brands and personalities. The number of these incidents has increased over time and the ABC has observed that they usually come in waves of activity on one platform or another. For example, several years ago, there was a wave of bitcoin scam advertisements on Facebook linking to a fake version of the ABC News website. The ABC reported this to Meta, which removed the offending advertisements. However, once that had happened, the activity moved to LinkedIn and Twitter. From there, similar activity moved on to email marketing.

More recently, the Corporation has seen an outbreak of imposter Facebook profiles pretending to be various ABC and triple j personalities. These profiles would comment on official ABC social media channels as a phishing exercise that targeted unsuspecting ABC audience members and attempted to obtain their personal information using the lure of competitions and prizes. ABC social media teams had to monitor and report this activity to Meta, as well as creating content to drive audience awareness and mitigate the scam activity.<sup>5</sup> This combination of reactive reporting and proactive audience messaging is time consuming and requires significant resources.

*Question 30: Are businesses impacted by potentially misleading and/or deceptive claims through display advertising, including sponsored advertising or posts featuring influencers?*

The ABC has liaised with various social media platforms on several occasions in relation to its brands, personalities and content being used by bad actors to mislead Australian consumers.<sup>6</sup> In

<sup>3</sup> Kraus F (18 August 2022) "[iOS Privacy: Announcing InAppBrowser.com - see what JavaScript commands get injected through an in-app browser](#)", accessed 8 September 2022.

<sup>4</sup> Mason M (13 July 2022) "[Australia's TikTok data vulnerable to access by China staff](#)", *Australian Financial Review*, accessed 8 September 2022.

<sup>5</sup> See, e.g., Wood P (23 January 2019) "[ABC presenters Virginia Trioli, Michael Rowland used in fake news scam](#)", *ABC News*, accessed 5 September 2022.

<sup>6</sup> See, e.g., Trigger R and Pancia A (19 September 2019), "[Scam using fake ABC News stories about Andrew Forrest sees woman fleeced of \\$670,000](#)", *ABC News*, Accessed 5 September 2022; Wood P (23 January 2019) "[ABC presenters Virginia Trioli, Michael Rowland used in fake news scam](#)", *ABC News*, accessed 5 September 2022.

an era where trust across all sectors, including the media, is in decline,<sup>7</sup> the use of ABC brands, presenters and content that intends to mislead and deceive audiences is damaging to the ABC, and it is time consuming and costly for the ABC staff to keep audiences safe through proactively driving awareness of scam activity and reactively reporting bad actors to the social platforms.

The Corporation is aware of scammers also targeting consumers using brands, content and personalities from other trusted media organisations and celebrities.

*Question 31: What is the process for consumers and business users to report potentially misleading and/or deceptive claims in advertising on social media, and what role do social media platforms play in these processes? How effective are these processes?*

As an approved media partner, the ABC has access to various partner portals, support email addresses and local media partnership contacts to report and escalate instances of misleading and deceptive claims. For the Corporation, these reports usually relate to imposter social media profiles, intellectual property/copyright breaches, and other activity that is using or misrepresenting ABC content, personalities, and brands to mislead the public. Reporting processes and action timelines have improved significantly over the past few years, with most reported advertisements, imposter accounts or content removed within a few hours.

There are, however, some challenging situations which stretch the ability of social media platforms to respond. For example, there have been instances where a Facebook advertisement does not contain ABC branding or content, but the hyperlink contained within the advertisement takes users to a fake version of the ABC News website, containing fake content promoting scams.<sup>8</sup> In such instances, the advertisement is generally removed by Meta once reported, however, Meta does not have authority or ability to remove the fake ABC News website from the internet altogether. On several occasions, the ABC has seen multiple instances of the same or a similar advertisement appear on Facebook from different advertiser accounts, all linking to the same/similar fake ABC News website. All these advertisements were approved by Meta's advertising approvals process. The Corporation would welcome any improvements to these processes to ensure multiple versions of a reported and removed advertisement do not continue to appear on these platforms.

There have been similar instances of these types of scam advertisements on LinkedIn, Twitter and via email.

It is worth noting that, while the ABC has access to platform media partner portals and local partnership contacts, other Australian businesses and individuals do not have the same opportunities to report and escalate issues. This can create real-world harm for businesses when things go wrong.<sup>9</sup>

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<sup>7</sup> See, e.g., Edelman (January 2022) [Edelman Trust Barometer 2022](#), accessed 8 September 2022.

<sup>8</sup> See, e.g., Trigger R and Pancia A (19 September 2019), "[Scam using fake ABC News stories about Andrew Forrest sees woman fleeced of \\$670,000](#)", ABC News, accessed 5 September 2022.

<sup>9</sup> Jaeger C (1 September 2022) "['Merchants of misinformation': Meta mistake crippled Sydney gym](#)", *The Age*, accessed 5 September 2022.