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2 TO:  
3 Department of Infrastructure, Transport, Regional Development and Communications  
4 Australian Government  
5

6 **Following information was mentioned on the consultation web page:**

7 <https://www.communications.gov.au/have-your-say/consultation-new-online-safety-act>

8 As a result of the Administrative Arrangement Order introduced on 5 December  
9 2019, the functions that were previously the responsibility of the Department of  
10 Communications and the Arts have been transferred to the Department of  
11 Infrastructure, Transport, Regional Development and Communications as of 1  
12 February 2020.  
13

14 **Consultation on a new Online Safety Act**  
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16 First of all, a lot of thanks to Department of Infrastructure, Transport, Regional Development and  
17 Communications for organising this important consultation.  
18

19 This opinion represents an opinion of an individual citizen, not any legal entity.  
20

21 This opinion does not contain:

- 22 – any business secrets
- 23 – any trade secrets
- 24 – any confidential information.  
25

26 This opinion is public.

27 PDF file of this opinion can be added to a relevant web page.  
28

29 Annex 1 holds information about previous Australian consultations.

30 Annex 2 holds information about copyright, licence and disclaimers.  
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33 Best Regards,  
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37 Jukka S. Rannila  
38 citizen of Finland  
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40 signed electronically  
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43 [Continues on the next page]  
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45  
46 **Online Safety Legislative Reform Discussion paper (DECEMBER 2019)**  
47

48 On the discussion paper (December 2019) page 14 is mentioned a consultation in the United  
49 Kingdom – White Paper on Online Harms. My opinion (Opinion 138) based on that consultation  
50 can be accessed from the following web page:

51  
52 **EN: Opinion 138: Online Harms White Paper**  
53 [http://www.jukkarannila.fi/lausunnot.html#nro\\_138](http://www.jukkarannila.fi/lausunnot.html#nro_138)  
54

55 **(1) European Union context**  
56

57 ***Code of Conduct on Countering Illegal Hate Speech Online*** (developed by the European  
58 Commission) is mentioned on page 15 (White Paper on Online Harms)  
59

60 **The EU Code of conduct on countering illegal hate speech online**  
61 [https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/  
62 racism-and-xenophobia/eu-code-conduct-countering-illegal-hate-speech-online\\_en](https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/racism-and-xenophobia/eu-code-conduct-countering-illegal-hate-speech-online_en)  
63

64 **(2) European Union context – Code of Practice on Disinformation**  
65

66 There is also ***Code of Practice on Disinformation*** (developed by the European Commission) which  
67 can be accessed from following pages.  
68

69 **Code of Practice on Disinformation**  
70 <https://ec.europa.eu/digital-single-market/en/news/code-practice-disinformation>  
71

72 **Factsheet on Tackling online disinformation**  
73 <https://ec.europa.eu/digital-single-market/en/news/factsheet-tackling-online-disinformation>  
74

75 Here can be mentioned annual self-assessment reports (2019) of signatories to the Code of Practice  
76 on Disinformation.  
77

78 **Annual self-assessment reports of signatories to the Code of Practice on Disinformation**  
79 **2019**  
80 [https://ec.europa.eu/digital-single-market/en/news/annual-self-assessment-reports-  
81 signatories-code-practice-disinformation-2019](https://ec.europa.eu/digital-single-market/en/news/annual-self-assessment-reports-signatories-code-practice-disinformation-2019)  
82

83 Self-assessment reports show work which signatories have done for tackling online disinformation.  
84

85 **Proposal: Code of Practice on Disinformation (developed by the European**  
86 **Commission) could be assessed carefully.**  
87

88 **Previous opinions related to misinformation**  
89

90 Here I mention my previous opinions related to misinformation

91  
92 EN: Opinion 40: Media Freedom and Pluralism / Audiovisual Regulatory Bodies  
93 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)

94  
95 EN: Opinion 44: Evaluation policy guidelines  
96 [http://www.jukkarannila.fi/lausunnot.html#nro\\_44](http://www.jukkarannila.fi/lausunnot.html#nro_44)

97  
98 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights  
99 [http://www.jukkarannila.fi/lausunnot.html#nro\\_86](http://www.jukkarannila.fi/lausunnot.html#nro_86)

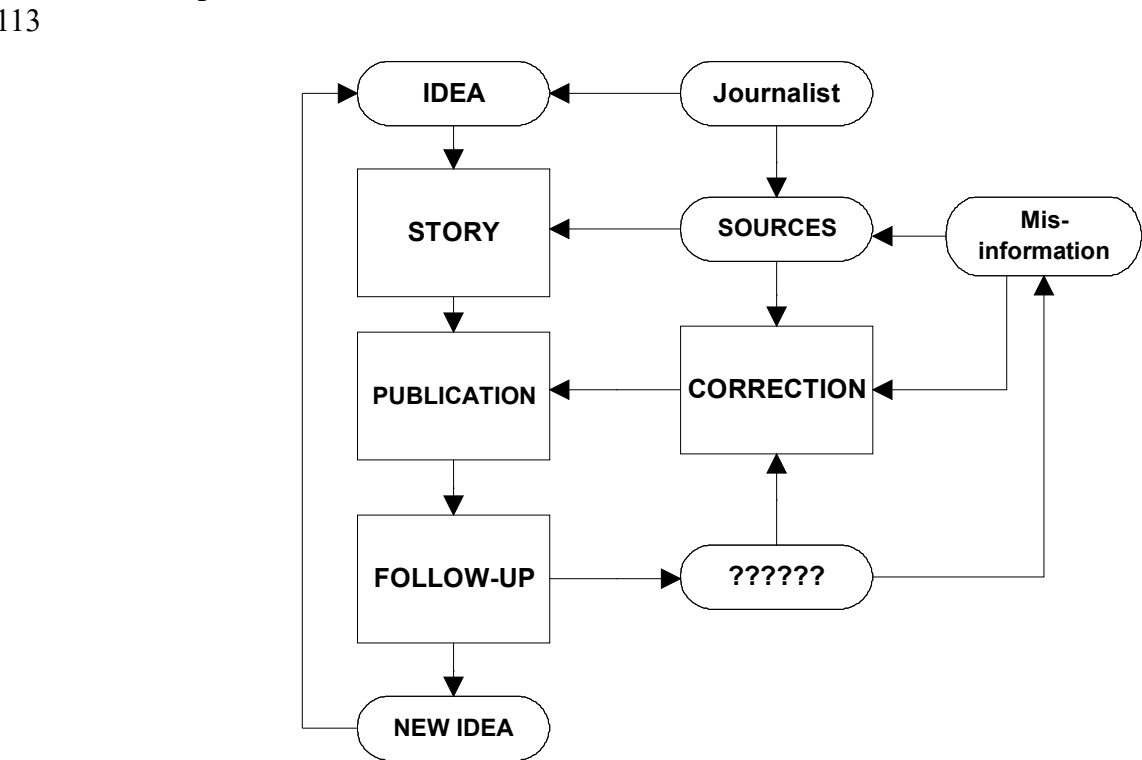
100  
101 EN: Opinion 118: Fake news and online disinformation  
102 [http://www.jukkarannila.fi/lausunnot.html#nro\\_118](http://www.jukkarannila.fi/lausunnot.html#nro_118)

103  
104 EN: Opinion 138: Online Harms White Paper  
105 [http://www.jukkarannila.fi/lausunnot.html#nro\\_138](http://www.jukkarannila.fi/lausunnot.html#nro_138)

106  
107 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative  
108 [http://www.jukkarannila.fi/lausunnot.html#nro\\_146](http://www.jukkarannila.fi/lausunnot.html#nro_146)

109  
110 I have repeated the same issues several times based on previous consultations.

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112 **General problems with misinformation**



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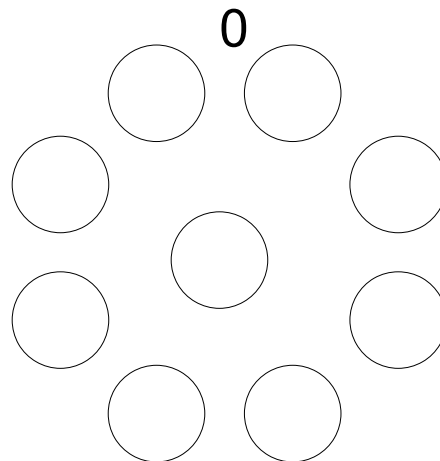
116 General problems with disinformation are following:

- 117 • misinformation from sources
- 118 • corrections based on misinformation
- 119 • follow-up with different stories.

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121 **Different systems without connections**

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125 Discussion paper (December 2019) mention several issues to be implemented by different  
126 stakeholders. Here I note that different stakeholders have their own information systems which may  
127 not be connected to other information systems.

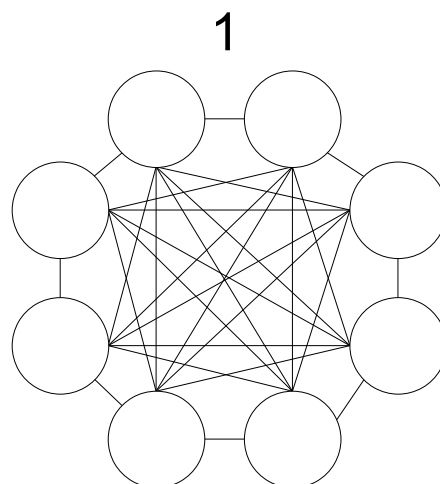
128

129 **Proposal: Different informations systems provided by different stakeholders could be**  
130 **assessed.**

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132 **Different systems with complex connections**

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135 Generally speaking different information systems evolve and there can be several systems with  
136 complex connections.

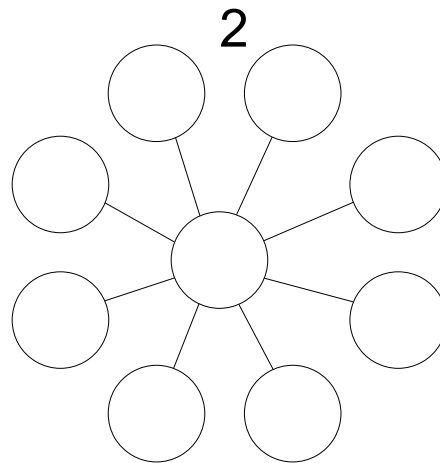
137

138 **Different systems with one central system**

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140 Next option is top have one central system with connection to all other systems.

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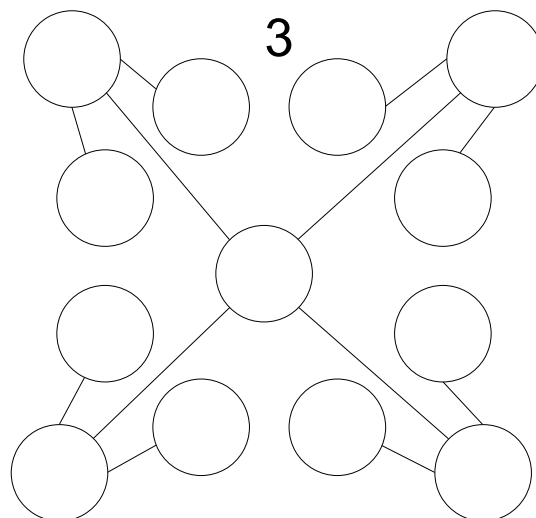
143

144 Problem with this option is dependency to just one central system which can have different  
145 problems. This means that problem in one central system affects immediately other systems.

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147 **Hierarchy between system**

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151 I have advocated several times hierarchy between system which means that there can be one central  
152 systems with different subsystems. This option means that a problem with one central systems does

153 not affect all system at the same time.

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155 **Some examples for reporting different information technology problems/issues**

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157 There are different services for reporting different information technology problems/issues; for  
158 example

- 159
- 160 • CERT – global and national teams
  - 161 • Common Vulnerabilities and Exposures (CVE) <sup>1</sup>
  - 162 • Scamdex <sup>2</sup>
  - 163 • The Spamhaus Project <sup>3</sup>
- 164

165 **Note: At the moment there is not one global system for informing all possible problems**  
166 **related to information technology.**

167  
168 **What this means to new Online Safety Act?**

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170 **Proposal: Australian Government (possibly Department of Infrastructure, Transport,**  
171 **Regional Development and Communications) could work for creating one central**  
172 **Australian information system which could handle communications between different**  
173 **systems related to online safety.**

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175 This one central Australian information system could handle communications between different  
176 information systems which are operated by different stakeholders – possibly with hierarchy between  
177 different information systems.

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179 **An example for cooperation: Web feeds (RSS and Atom)**

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182  
183 I have advocated usage of web feeds <sup>4</sup> on several previous opinion documents. Actually there are  
184 two standards for web feeds: RSS <sup>5 6</sup> and Atom <sup>7 8 9</sup>.

185  
186 **Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different**  
187 **informations systems (EU / Member states).**

1 <https://cve.mitre.org/>

2 <http://www.scamdex.com/>

3 <https://www.spamhaus.org/>

4 [https://en.wikipedia.org/wiki/Web\\_feed](https://en.wikipedia.org/wiki/Web_feed)

5 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification

6 <https://en.wikipedia.org/wiki/RSS>, Wikipedia / RSS

7 [https://en.wikipedia.org/wiki/Atom\\_\(standard\)](https://en.wikipedia.org/wiki/Atom_(standard)), Wikipedia / Atom (standard)

8 <https://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

9 <https://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

188

189

**Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-time) information for different stakeholder(s) (communities).**

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**Proposal: There can be different web feeds (RSS and/or Atom) for different stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible solution.**

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**Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**

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It can be easier to create web feeds in different information systems since web feeds enable connections without direct system-to-system connections.

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It can be noted, that different back-office systems (with a wide variety of different technologies) can implement RSS standards, and these RSS feeds can be used in the front-office systems. With this kind solutions front-office systems dont need direct system-to-system communications with back-office systems.

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**More technical consultations?**

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Based on answers (this consultation generally) there could be more technically oriented consultations. Previously mentioned issues (this opinion) could be detailed for new technically oriented consultations.

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**Proposal: More technically oriented consultations could be organised after this consultation.**

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**Good luck !!!!!!!**

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This Opinion is quite limited and probably other opinions will result some constructive ideas.

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### ANNEX 1

General page for my previous opinions is following:

[www.jukkarannila.fi/lausunnot.html](http://www.jukkarannila.fi/lausunnot.html)

#### **Information about previous Australian consultations:**

EN: Opinion 54: Government Content Management System

[http://www.jukkarannila.fi/lausunnot.html#nro\\_54](http://www.jukkarannila.fi/lausunnot.html#nro_54)

EN: Opinion 56: National Identity Proofing Guidelines

[http://www.jukkarannila.fi/lausunnot.html#nro\\_56](http://www.jukkarannila.fi/lausunnot.html#nro_56)

EN: Opinion 57: Updating the Commonwealth Procurement Rules

[http://www.jukkarannila.fi/lausunnot.html#nro\\_57](http://www.jukkarannila.fi/lausunnot.html#nro_57)

EN: Opinion 72: Queensland biofuel mandate

[http://www.jukkarannila.fi/lausunnot.html#nro\\_72](http://www.jukkarannila.fi/lausunnot.html#nro_72)

EN: Opinion 73: Financial / Conceptual Frameworks

[http://www.jukkarannila.fi/lausunnot.html#nro\\_73](http://www.jukkarannila.fi/lausunnot.html#nro_73)

EN: Opinion 78: Consumer Complaints Register (NSW)

[http://www.jukkarannila.fi/lausunnot.html#nro\\_78](http://www.jukkarannila.fi/lausunnot.html#nro_78)

EN: Opinion 79: PCEHR (Information Commissioner Enforcement Powers) Guidelines 2015

[http://www.jukkarannila.fi/lausunnot.html#nro\\_79](http://www.jukkarannila.fi/lausunnot.html#nro_79)

EN: Opinion 85: Regulatory options for automated vehicles

[http://www.jukkarannila.fi/lausunnot.html#nro\\_85](http://www.jukkarannila.fi/lausunnot.html#nro_85)

EN: Opinion 87: Assessing privacy and big data on the Internet

[http://www.jukkarannila.fi/lausunnot.html#nro\\_87](http://www.jukkarannila.fi/lausunnot.html#nro_87)

EN: Opinion 90: Consent / Information and Privacy Commission NSW (IPC)

[http://www.jukkarannila.fi/lausunnot.html#nro\\_90](http://www.jukkarannila.fi/lausunnot.html#nro_90)

EN: Opinion 103: About lobbying - New South Wales

[http://www.jukkarannila.fi/lausunnot.html#nro\\_103](http://www.jukkarannila.fi/lausunnot.html#nro_103)

EN: Opinion 115: Framework for Secondary Use of My Health Record Data

[http://www.jukkarannila.fi/lausunnot.html#nro\\_115](http://www.jukkarannila.fi/lausunnot.html#nro_115)

EN: Opinion 117: The Digital Economy: Opening up the conversation

[http://www.jukkarannila.fi/lausunnot.html#nro\\_117](http://www.jukkarannila.fi/lausunnot.html#nro_117)

EN: Opinion 148: Updating Victoria's Open Data Policy

[http://www.jukkarannila.fi/lausunnot.html#nro\\_148](http://www.jukkarannila.fi/lausunnot.html#nro_148)



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284

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