

AMENDED Exhibit 177

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Document Provided in Native Format



Teen Support for SSI & ED

Moving towards an industry leading position • IG Well-being



Note that this work contains sensitive (*potentially triggering) content materials. For internal use only, please do not distribute.

Executive Summary

- Over the past few years, we've made **significant progress in reducing teen's exposure** to harmful content.
- However, **several pressure points** including evolving teen safety risks, parents' and guardians' desire for greater control, increased legal and media scrutiny, and heightened competitive pressure, require us to take a fresh approach.
- Our current approach has involved: 1) balancing **access to recovery** communities with **discouraging SSI & ED promotion**; 2) focusing on **content-level enforcement** and mitigation; and 3) identifying and addressing **explicit expressions** of SSI & ED behavior.
- Given user behaviors, risks and expectations, we recommend evolving our approach to teen support for SSI & ED in the following ways: 1) recalibrate the balancing of **support and safety**; 2) move from **content-level moderation to also account and "community" level** enforcement and 3) expand the focus from explicit manifestations of the problem(s) to **related and adjacent** expressions.
- To realize this, our strategic framework is focused on **preventing** teens from being exposed to potentially harmful or "triggering" content, **protecting** them from accessing problematic content and profiles, and **intervening** when we detect high engagement levels.
- Our **goals for this discussion** are to: 1) determine whether leads are aligned with the overarching strategy, specifically as it relates to Phase 1; 2) gather feedback on the initial measurement framework and 3) get a directional steer for our Digital Refresh proposal.

01 Background

What is SSI and ED?

Relationship Amongst Key Concepts

- **Suicide and Self-Injury**
Suicide and self-injury are different constructs, but sometimes overlap and co-occur, and are often discussed together. Just because someone engages in self-injury, does not mean they want to die; and just because someone died by suicide does not mean they had a history of self-injury.¹
- **SSI and Eating Disorders**
Mental health disorders, including eating disorders, are a major risk factor associated with suicidal thoughts and behaviors and self-injury.¹

Key Terms

- **Prevalence.** Measures the percentage of total VPVs that violate our policies and standards. It is measured by taking samples from a population of interest, having human raters decide whether the samples violate our community standards, and estimating the violation rate of the population based on labeled samples.
- **High CoB.** Users who consume high concentrations of bad content, including content violating any of our borderline or violating content policies (i.e., those who have ≥ 8 views of SSI or ED content weekly).
- **Trigger.** A situation or experience that elicits emotional distress and that may awaken or worsen the symptoms of trauma or a mental health condition.³⁻⁵
- **“Blunt” Controls.** Teen and parent or guardian opt-in controls that limit discovery of, recommendations for, and engagement with content and accounts adjacent to sensitive topics.
- **Body Image.** Body image is a person’s perceptions and feelings about their body or physical appearance. It includes three orthogonal, but related, dimensions: body dissatisfaction, body appreciation, body concern.²
- **Adjacent topics*.** Content topics that do not explicitly reference SSI or ED, and are thus not classified as violating or borderline, but which may be triggering to someone experiencing SSI (i.e., mental-health related, depressive) or ED (i.e., body-focused, weight loss, dieting, health-related). **

¹ Suicide & Self-Injury Among Youth: A Review

² Body Image: Strategy One-Pager

³ <https://www.verywellmind.com/what-does-it-mean-to-be-triggered-4175432>

⁴ <https://www.healthline.com/health/triggered>

⁵ <https://psychcentral.com/lib/what-is-a-trigger>

* We have a preliminary understanding of adjacent topics, informed by expert guidance. We will conduct further research to formalize a definition and identify the relevant content categories.

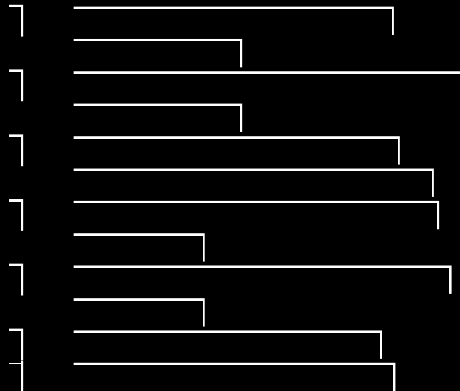
**We are not proposing that we address Appearance Comparison, which is upstream in the body image causal pathway.

BACKGROUND

Current approach

Landscape of our current SSI/ED enforcements on Instagram.

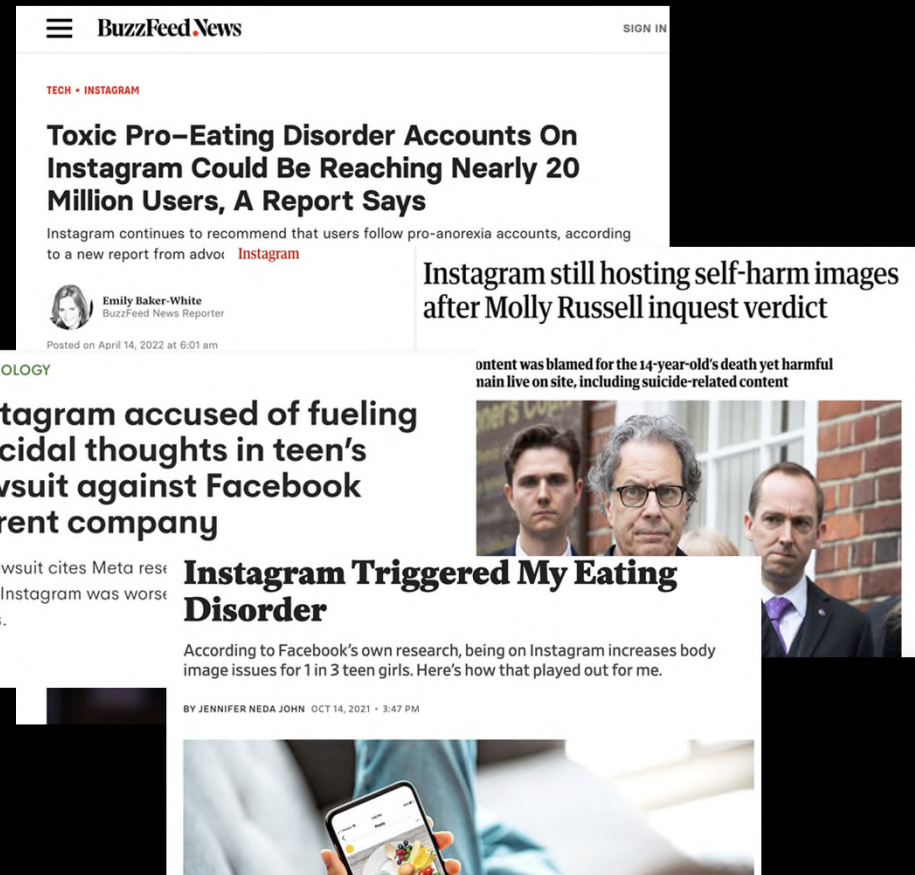
SSI & ED Interventions



Full list is [here](#)

BACKGROUND

While we have made significant progress in reducing teens' exposure to harmful content, the ever-evolving nature of these issues means **there is no finish line.**



BACKGROUND

Why evolving how we approach SSI & ED matters

1 teens' behavior on IG suggests a need for more support.

We know that [SSI and ED have a significantly disproportionate large teen audience](#). SSI and ED SWOP among teens is [higher](#) than among adults on IG ([query](#)). When examining consumption patterns among high consumers (≥ 8 pieces of violating content) of SSI and ED violating content, teens are approximately [more](#) likely to be high consumers than adults.

Parents and guardians are asking for more control.

Parents can play a key role in the safety and well-being of their teens. We know that they do not always [feel comfortable](#) with their teens using IG, in part, because they do not have the ability to take direct action to protect their teens from potential harm; [of](#) parents say they want an increased sense of control. In Q1'23, Instagram Product and Policy leads [engaged](#) in direct discussions to better understand the POV of parents of teens experiencing issues related to SSI and ED. This resulted in leads' recommendation for "blunt controls" as a means to reduce exposure to potentially triggering content.

[REDACTED]

Competitors are seen as offering more safety measures.

In a bid to keep teens safe, our peers are [refreshing their playbooks](#). TikTok, in particular, has made progress in improving safety by offering a range of user-facing interventions. These interventions provide support for individuals dealing with high-severity problem areas, ranging from extensive support on discovery surfaces (e.g., Search) to user and parent-facing content controls. Despite TikTok's launch of several teen safety features, it's worth noting the platform may be amplifying sensitive content to users who show an interest in it, as highlighted in a [recent study](#).

SSI & ED Content Consumption Framework

Based on in-depth [feedback sessions](#) with external SSI & ED advisors in Aug-Sep 2023
[SSI labeled content consumption ecosystem Q2 2023](#)
[IG - SSI-ED discovery vs. repeat exposure and navigation paths to profile consumption](#)

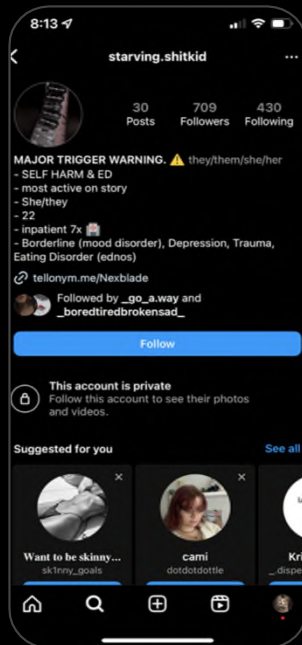
User group	No / Low Intent All teens, and those in recovery from SSI/ED	Medium Intent May be “at risk” of experiencing SSI/ED	High Intent May be actively struggling with SSI/ED
Content consumption patterns	Discovery No or low intention to consume SSI/ED related content. User exposed to in-feed / recommended content that they personally find triggering or harmful to their WB	Search & Selection User searches for non-policy-violating keywords/ topics that may harm their WB or user “chains” content adjacent to harmful topics	Repeat consumption User repeatedly and intentionally consumes SSI/ED content
Thoughts & feelings	Typical teen self & social orientation Identity exploration, fluctuating emotions & impulsivity, greater importance of peers & social acceptance, increased self-consciousness about all aspects of self (including body/appearance)	At-risk thoughts & feelings Low mood, lack of coping skills, increased & intense negative appearance comparison & body image (for ED)	“Stuck Brain” Highly problematic and socially reinforced patterns of interaction and content consumption that are very difficult for teens to break by themselves, including preoccupation with harmful topics and rigid thinking
Key platform behaviors & experiences	Exposure to SSI/ED related content on unconnected surfaces or on connected surfaces Initial exposure to SSI-ED content primarily on: <ul style="list-style-type: none"> • Explore • Profile • Reels tab (for older teens) Users in recovery may proactively change online environment by e.g., blocking, muting, unfollowing	Searching for and viewing SSI/ED adjacent topics Initial and repeat exposure to SSI/ED content via Profiles accessed on Explore, Search, & Home Following accounts that post SSI/ED content, viewing and responding to Stories from these accounts	Repeat viewing (primarily from Home, Profile, and Explore), longer dwell time, or longer time spent viewing SSI/ED related content Saving SSI/ED related content for future viewing. Saved content contributes to repeat exposures particularly for youth. Engaging with online SSI/ED communities via non-friends & family accounts Accessing potentially harmful accounts by navigating to Profile from Explore & Search

NOTE: User intent is a concept that describes how someone might interact with content on our platform according to expert feedback and DS analysis. It is not a diagnosis or a representation of their real-world behavior, and it is not linear, causal, or applicable to all users.

On-Platform “High Intent” Patterns

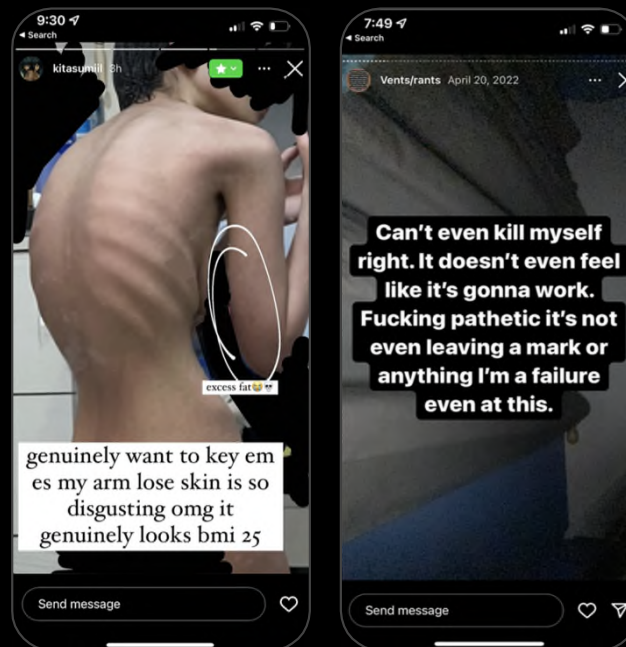
What are some potentially problematic SSI-ED related patterns observed on IG?

*Based on exploratory content analyses with limited samples: [The State of ED on Facebook and Instagram](#) (analyses conducted by academic advisor); [SSI/ED Primary Research](#) (limited distribution)



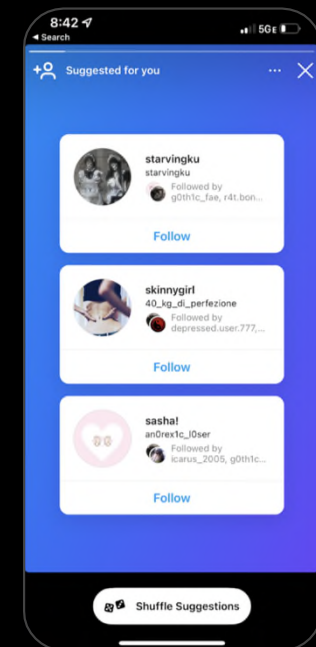
“Gated” Communities

Some users are involved in SSI-ED closed “communities” on IG; content production is targeted at people already in a user’s follower network. These users may feature SSI-ED related terms in profile, possibly to find and signal a non-judgmental space where SSI-ED behavior is acceptable.



“Vent” Accounts

Accounts dedicated to discussing SSI-ED issues can serve as secretive, secondary “vent accounts” that may provide a nonjudgmental space for people to share their experiences and feelings. These accounts may also normalize problematic SSI-ED related behavior, especially for younger users.



Account & Content Recommendations

After connecting with accounts that include or create SSI-ED related content (e.g., “vent” accounts), recommendations for suggested accounts related to SSI-ED may be shown to users across surfaces. Persistent recommendations for SSI-ED adjacent topics, such as body image, weight loss, fitness and sad memes may be shown on unconnected surfaces.

03 Evolving Our Stance

EVOLVING OUR STANCE

Our current position

Negotiating a balance between enabling recovery support and enforcing promotion

While we do not allow people to intentionally or unintentionally celebrate or promote suicide or self-injury, we do allow people to discuss these topics because we want Meta to be a space where people can share their experiences, raise awareness about these issues, and seek support from one another ([ref](#)).

Focusing on content-level enforcement and mitigations

Our current moderation approach has primarily centered around content-level [detection and enforcement](#). We have implemented both proactive and reactive methods for detecting content that violates SSI [Community Standards](#) (CS) related to SSI and ED issues. [Enforcement actions](#) include escalating credible suicide intent, removing content that violates CS policies, providing users with resources (such as checkpoints) when necessary, implementing a MAS screen on content, and reducing the visibility of SSI and ED content. In the case of [borderline content](#), we enforce measures through content demotions and filtering. We also [age-gate borderline SSI & ED content for teens](#).

Emphasis on explicit expressions of SSI & ED behavior

We [action on content](#) that encourages suicide or self-injury, including fictional content such as memes or illustrations and any self-injury content which is graphic, regardless of context. We also remove content that identifies and negatively targets victims or survivors of suicide or self-injury seriously, humorously or rhetorically, as well as real time depictions of suicide or self-injury. Eating disorder content that includes focused depiction of drastic or unhealthy weight loss with at least one eating disorder signal is considered violating.

EVOLVING OUR STANCE

How we should **evolve**
our stance**Recalibrate the balancing of support and drive a harder line on teen safety**

Historically, we have tried to balance enabling users to find supportive communities with enforcing content that “glorifies” or “promotes” SSI & ED behavior. However, seemingly “pro” SSI & ED profiles are easily discoverable because there is no way to definitively know which accounts are “pro” and which are recovery-based. Additionally, recovery is a nonlinear journey. We’ve also heard from [experts](#) that teens who are experiencing SSI & ED may be involved in problematic patterns of interaction and content consumption that can be very difficult to break (i.e., “stuck brain”).

This requires us to [continue to evolve our approach](#) and take bolder action to limit the discoverability of profiles that produce SSI & ED content.

Move from content-level moderation to also account and “community” level enforcement

Our existing approach to dealing with SSI & ED has focused on detection, enforcement, and measurement at the content-level. However, our understanding of this issue is evolving, and we now recognize that such content is merely a symptom of a deeper problem. The real challenge lies in the persistence of accounts* and communities that are dedicated to spreading this content. If we neglect the underlying network dynamics that drive the dissemination of SSI & ED related content, we will not be able to make a significant dent in the problem.

Expand the focus from explicit manifestations of the problem(s) to related and adjacent expressions

Our current approach focuses on explicit expressions of SSI & ED content. However, [expert interviews](#) revealed that these issues exist across a spectrum, and engagement patterns in related areas may serve as early risk indicators that a teen is starting to struggle. For example, in the context of self-harm, we would want to look for expressions of low mood, depression, or anxiety. In the case of eating disorders, we may want to look for [negative appearance comparison and body dissatisfaction](#). Developing more durable solutions will require us to move upstream and intervene across adjacent areas.

*Previous legal counsel noted that SSI/ED Account classification may give rise to medical diagnosis in violation of EU laws. Therefore, the workstream was blocked. Currently, the issue is under further legal review and updated guidance will be published the week of October 30th.

04 Strategic Framework

STRATEGY

Guiding Principles

- 01 **Establish stronger baseline safety protections; enable personalized control**
We'll implement a robust set of safety measures to ensure that teens, especially those at risk or in recovery, can navigate Instagram without exposure to potentially harmful or triggering content.
- 02 **Empower parents to play an active role in promoting safety.**
We'll build resources for parents to support their teen's safety and well-being as their teen learns effective coping skills.
- 03 **Match the level of support to the weight of the signal.**
We'll tailor solutions to reflect the intentionality or frequency of a teen's actions, instead of creating one-size-fits-all solutions. We'll focus on teens' behaviors without trying to infer the motivations behind them.
- 04 **Tackle the root cause(s), rather than just the symptoms.**
Whenever possible, we'll aim to go upstream to develop more durable solutions.

STRATEGY

Strategic Framework

*Note: We will partner with Supervision to involve parents at each of the 3 stages (when necessary and applicable), but it is not the main initiative of this deck.



STRATEGY

Measurement Approach

CONCEPTS

We'll illustrate **how the core IG experience can evolve** to mitigate the SSI & ED journey through a narrative with Maya (teen) and Caleb (dad).

* Please note that the journey is vastly simplified for illustrative purposes.

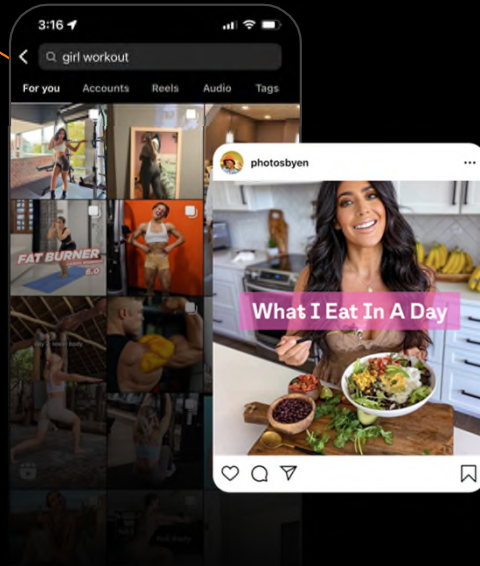
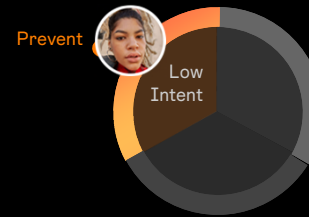


Maya
14-year-old



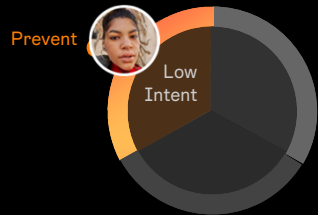
Caleb
Dad

CONCEPTS



Teen discovers content

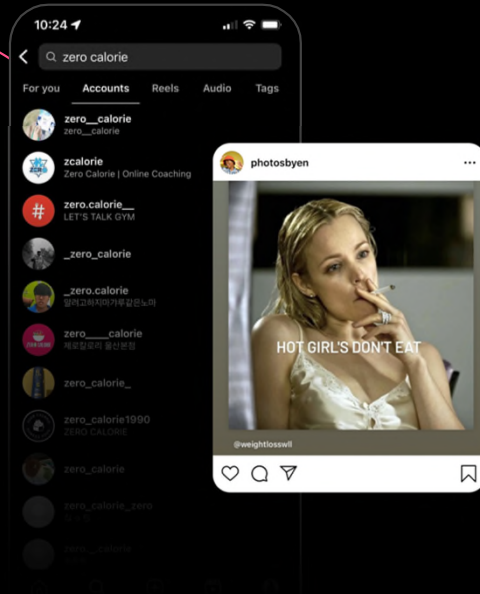
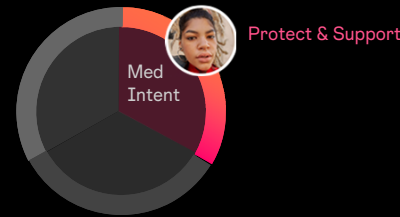
14-year-old Maya is interested in losing weight before being seen in a swimsuit at summer camp. As she browses IG, her curiosity is piqued by trendy “What I Eat in a Day” Reels and fitness content on Explore. The more she engages with this content, the more she gets exposed to it.



Teen discovers content

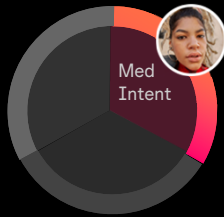
What can IG do at this stage?

CONCEPTS



Teen searches out content

With just a week left until summer camp, Maya grows increasingly anxious and seeks out tips on calorie restriction and rapid weight loss. Through search on IG, she finds ED-related profiles and begins to follow a few accounts in the ED community.

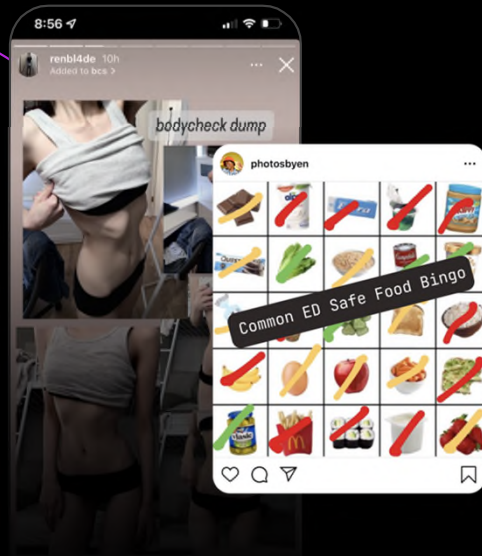
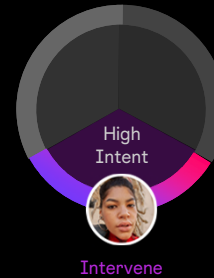


Protect & Support

Teen searches out content

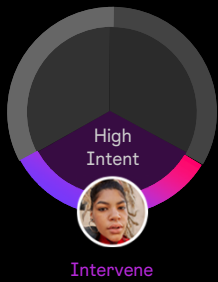
What can IG do at this stage?

CONCEPTS



Teen actively struggles

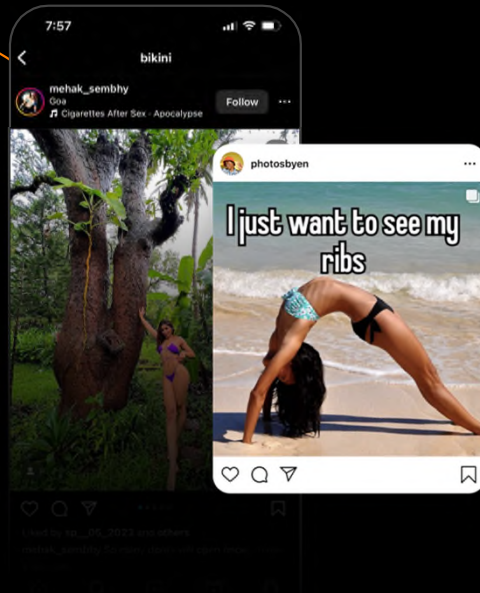
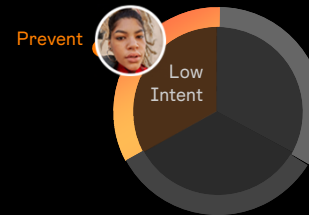
As summer camp comes and goes, Maya still finds herself severely restricting her daily calories and obsessing over her weight. She repeatedly views saved ED content, ruminates over posts to make sure she's eating only "safe foods," and participates in daily "body checks" on her Stories with her private community.



Teen actively struggles

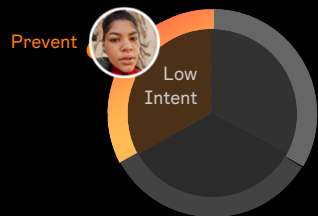
What can IG do at this stage?

CONCEPTS



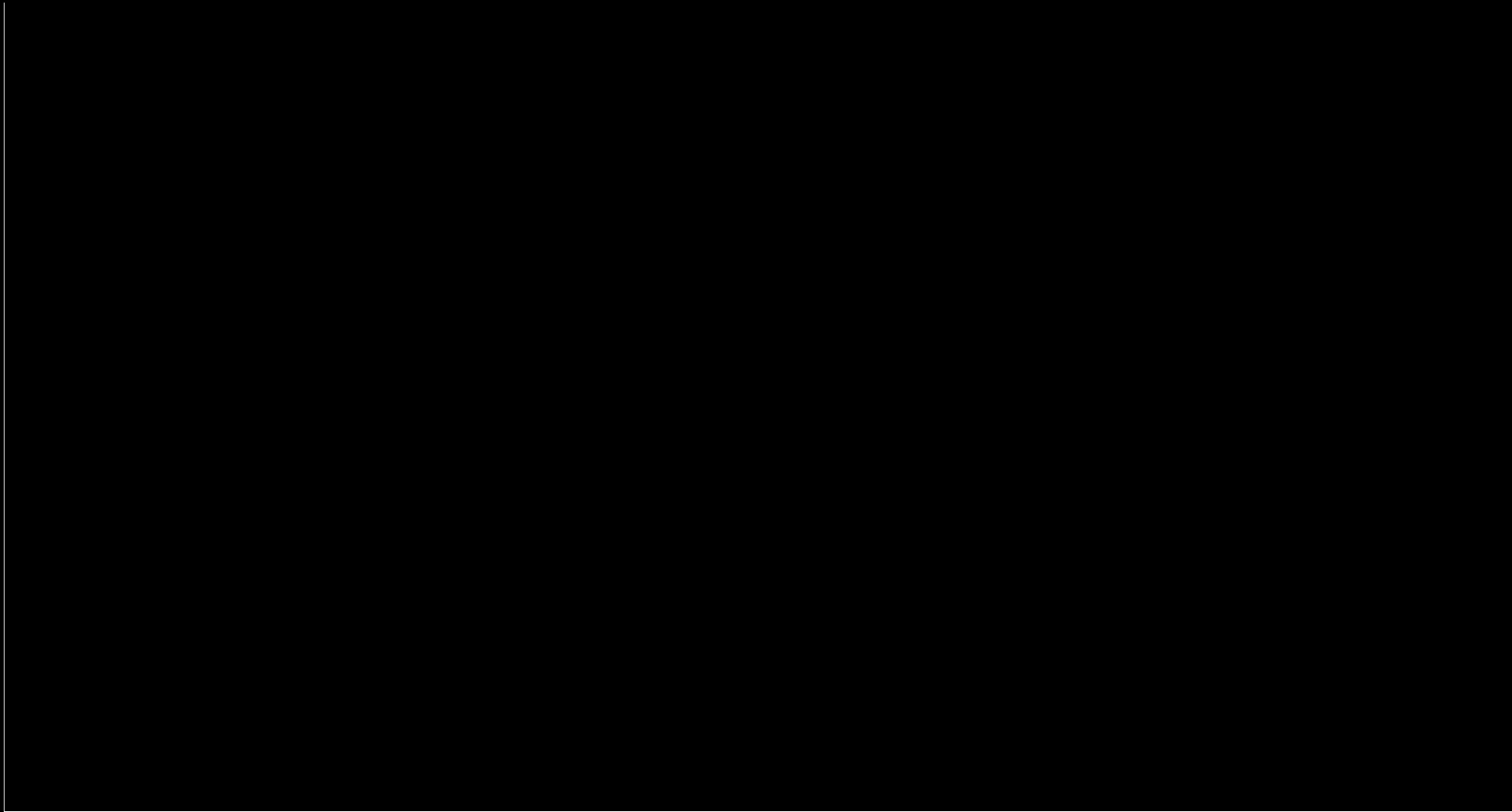
Teen is in recovery

Maya gets the off-platform help she needs from Caleb and her ED-recovery support group. She comes back on IG only to realize that all the triggering content around ED and adjacent topics are still populating her feed and recommendations. She wants to get a fresh start with new interests.



Teen is in recovery

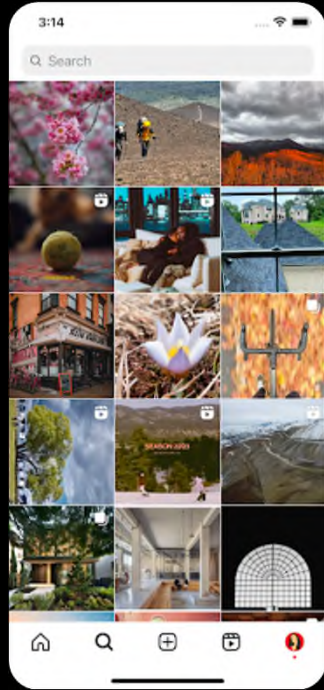
What can IG do at this stage?



Spectrum of Directions

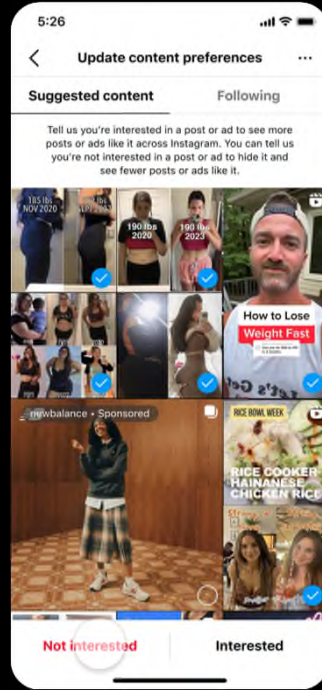
Digital Reset/Refresh

1 Deep dive for refreshing suggested content and ads



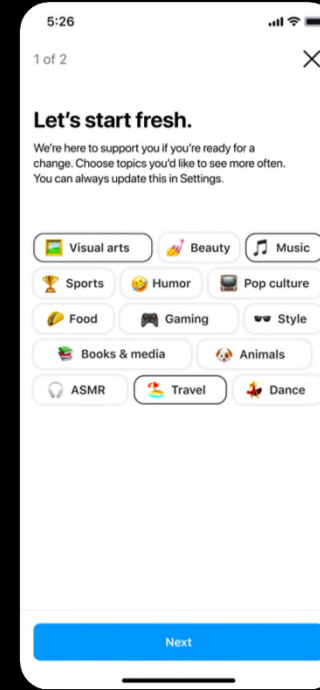
1. Full reset of Recs, with curated cold start (akin to DSA non-profiling work on Explore)

Allow people to fully reset their recommendations and Ads across surfaces (Feed, Explore, Reels)



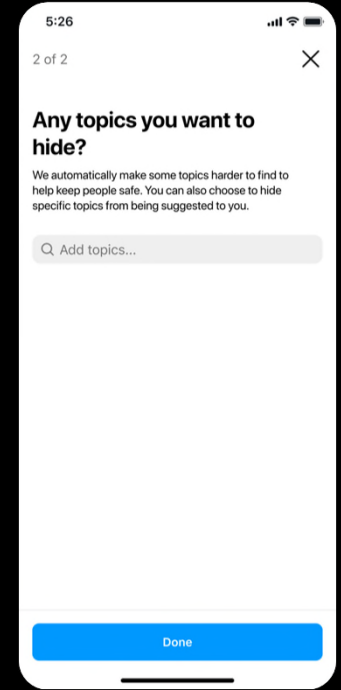
2. Refresh via bulk management

Allow people to bulk tune their recommendations and Ads across surfaces (Feed, Explore, Reels). Given feasibility issues with North Star topical systems, we recommend this as the MVP.



3. Full reset of Recs, with topical onboarding

Allow people to fully reset their recommendations and ads, AND select new topics they want to see and avoid as well.



Options for Digital Refresh

User Experience

How easy is it for users to navigate the experience?

Feasibility

Can the product be realistically implemented and developed using the available technology within a reasonable timeframe?

Effectiveness

How well does this solution reduce teens' exposure to triggering and/or problematic content?

Business Risk

What risks does this solution introduce to the business?

