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## Global Digital Rights Coalition submission to the Global Dialogue on AI Governance

7 May 2026

About the **Global Digital Rights Coalition (GDRC)**: The Global Digital Rights Coalition (GDRC) is a collective of civil society organisations from the Global Majority and Global North, offering our shared expertise to advance human rights and multistakeholder principles throughout global digital governance processes. Previously formed as the Global Digital Rights Coalition for WSIS (GDRC-WSIS), in early 2026 the GDRC broadened its mandate to include the implementation of the outcomes of the WSIS+20 review process and the Global Digital Compact, including the AI mechanisms evolving from those processes.

The GDRC's

core objective is to anchor international digital governance in international human rights law and in meaningful multistakeholder engagement and procedures. For more information, visit [here](#).

Our members are: Access Now – Association for Progressive Communications (APC) – ARTICLE 19 – Center for Communication Governance (CCG) – CyberPeace Institute – Data Privacy Brasil – Derechos Digitales – Digital Rights Foundation – DW Akademie – the European Center for Not-for-Profit Law (ECNL) – FactSpace West Africa – Fundación Multitudes – Global Forum for Media Development – Global Partners Digital (GPD) – Global Network Initiative (GNI) – the International Center for Not-for-Profit Law (ICNL) – ICT Watch – Media Foundation for West Africa – Paradigm Initiative – Research ICT Africa – STOPAIDS – Tech Global Institute – WACC – Weiba Foundation – WITNESS

### Submission Response

#### Priorities

#### 8. In your opinion, what outcomes would make the first Global Dialogue on AI Governance a success?

To be successful, the Dialogue must: (1) adopt a targeted agenda, grounded in international law, including international human rights law, (2) embrace a truly multistakeholder approach, and (3) contribute to coordination and coherence across AI governance processes, including ensuring close integration with

existing UN initiatives, specifically the work of the OHCHR and the UN human rights mechanisms as well as the WSIS and GDC processes and mechanisms.

The Dialogue should adopt a targeted agenda, which needs to include a standing agenda item on human rights and gender equality (para 4e, A/RES/79/325). All human rights must be protected, respected and promoted throughout the full lifecycle of all AI technologies. This principle should ground all parts of the Dialogue's work. As one important implication of this principle, we strongly advise the Dialogue to issue recommendations on prohibited AI practices and use cases ("red lines"), focusing on AI practices and use cases that are not in compliance with international human rights law. We refer to the existing work of the General Assembly (A/RES/78/265), the OHCHR (A/HRC/60/45), the UN human rights mechanisms (Special Procedures and Treaty Bodies), and national AI safety institutes. Another topic is the development of best practices guidelines across different human rights due diligence and risk mitigation methodologies.

The Dialogue needs to be truly multistakeholder, both in its functioning and its outcomes. One aspect of this is to identify actionable pathways for financing and capacity-building for Global South countries, including supporting local research to produce evidence-based policy-making. Another aspect pertains to how the Dialogue includes stakeholders throughout its work (further recommendations here).

Finally, the Dialogue should contribute to coordination and coherence across AI governance processes, finding alignment between existing and emerging governance initiatives to avoid fragmentation and duplication.

**9. From your perspective, which of the following thematic areas identified by the General Assembly Resolution 79/325 for the AI Dialogue reflect your priorities for urgent action and active engagement by your entity? Please select up to 4 priorities.**

- Safe, secure and trustworthy AI
- AI capacity-building
- **Social, economic, ethical, cultural, linguistic and technical implications of AI**
- **Interoperability of governance approaches**
- **Protection and promotion of human rights**
- **Transparency, accountability, and human oversight**

- Open-source software, open data and open AI models

## 10. Please briefly explain your selection.

Regarding the implications of AI, the Dialogue should move beyond a narrow focus on “AI safety” (as it has been the case at past AI Summits) and explicitly engage with existing and emerging harms already experienced in many countries, especially of the Global South. These include issues related to labour exploitation in data work, lack of decent work protections, unequal access to education and digital infrastructure, technology-facilitated gender-based violence and threats to safety and security in real-world deployments of AI systems. Addressing these harms requires grounding AI governance in lived realities, rather than hypothetical future risks.

As outlined in question 8, we reiterate the need to ground all AI governance efforts in human rights. This implies issuing recommendations on prohibited AI practices and use cases (‘red lines’), including setting standards to operationalize moratoria on high-risk AI systems called for by the Office of the United Nations High Commissioner for Human Rights (A/HRC/48/31), and guidelines on human rights due diligence and risk mitigation methodologies. These tasks will enable the Dialogue to move beyond a narrow focus to address the full spectrum of AI-related impacts and harms.

## 11. In your opinion, are there any cross-cutting or emerging issues not captured by the listed themes above? If so, please explain.

One critical, cross-cutting issue is to ensure the rigorous application of human rights due diligence as well as risk mitigation throughout the full AI lifecycle, including its development and use. We wish to highlight four additional topics: Data governance: While we recognise the work undertaken by the CSTD’s Working Group on Data Governance, one cannot consider AI and Data governance as separate or delineated questions. The Dialogue needs to ensure close collaboration and coherence with the Working Group.

Gender equality: The current AI paradigm reproduces and amplifies existing gender inequalities, including bias and exclusion in automated systems, gender-based online violence (including AI-generated harms), and the exploitation of women’s labour across AI

value chains. Over the course of the last years we have seen AI-generated NCII rising up as one of the most concrete and rapidly scaling harms with serious impacts on the victims. Addressing these impacts requires the consistent application of an intersectional gender lens across all thematic areas.

**Interoperability of governance approaches:** This is critical because media ecosystems and human rights documentation are inherently cross-border. Our engagement with initiatives like the Coalition for Content Provenance and Authenticity (C2PA) highlights the importance of shared, open technical standards that work across platforms and jurisdictions to verify content authenticity and maintain the chain of custody for human rights evidence.

**Environmental impacts:** The Dialogue should move beyond narrow sustainability-oriented discussion at the climate and AI intersection, to strongly acknowledge negative impacts of AI and strategies for their mitigation, such as how AI development impacts environmental, labour and production systems, with the potential to exacerbate poverty and inequality in a systemic manner. Concrete strategies should be prioritised, such as lifecycle-based environmental impact assessments, and application of the precautionary principle, as also identified within the UNESCO Recommendation on the Ethics of Artificial Intelligence. Impact of AI governance.

## **12. How are the governance gaps and related developments/advances in the thematic areas you selected above affecting your country, region, or sector? Please highlight the most significant challenges and opportunities.**

Across the four themes we identified, an overarching gap is the weak adoption of human rights-based regulatory frameworks related to AI. The result of this is that AI has been designed, developed and deployed across jurisdictions in a manner that does not comply with existing international human rights law obligations.

At a minimum, the adoption of a human rights-compliant regulatory framework for AI requires the integration of human rights due diligence, including ex ante and post hoc human rights risk assessment. Human rights risk assessment and risk mitigation should apply throughout the full AI lifecycle, encompassing both AI-related technologies (such as foundation models) and specific applications.

There should be ongoing evaluation to identify and prohibit technologies or applications which cannot be operated in compliance with international human rights obligations.

In Global South contexts, data extractive practices combined with the historical under- and mis-representation of communities, leads to AI systems embedding and perpetuating biases and resulting in inequitable outcomes. Further, these contexts are overlooked by corporations (primarily originating in the Global North) in the design and development of these models. This requires meaningful inclusion of communities in the governance, design and deployment of AI systems.

This dynamic is also underpinned by labour exploitation across AI value chains, particularly in data labelling, content moderation and other forms of precarious digital work, and by resource extraction and environmental exploitation associated with a resource-intensive AI paradigm, which disproportionately impact the Global Majority.

Parallel or fragmented processes challenge meaningful inclusive participation. Given that many marginalised communities globally and especially those originating from the Global Majority experience resource and language constraints in participation, interoperability in governance can enable meaningful participation. Further, engagement with these communities can help shape equitable, just and pluralistic models of AI governance.

## International cooperation on AI governance

### 13. What role can the AI Dialogue play in advancing international cooperation on AI governance?

The AI Dialogue should play a pivotal role in advancing international cooperation by fostering shared understanding, creating coherence and developing shared baselines for AI governance across diverse national and regional contexts. These shared understandings should not aim at uniformity, but rather at enabling interoperability between different governance models. Countries have distinct social, economic, and institutional realities, and AI governance frameworks must remain responsive to these differences. The Dialogue can therefore support a model of cooperation that is both context-sensitive and globally coherent,

allowing for policy diversity while ensuring alignment around fundamental safeguards and objectives, all in full compliance with international human rights law.

In this regard, the Dialogue can also advance convergence around precautionary approaches, including the establishment of standards that operationalize the moratoria on high-risk AI systems, in line with recommendations from the Office of the United Nations High Commissioner for Human Rights (A/HRC/48/31). Such measures can serve as common guardrails while regulatory capacities are being developed, helping to prevent irreversible harms and ensuring that innovation does not outpace the protection of human rights.

#### **14. What are some of the existing initiatives, partnerships, or mechanisms that the AI Dialogue should build upon or connect with, and what added value could the AI Dialogue bring?**

It is essential for the Dialogue to ensure close integration with existing initiatives, specifically the work of the OHCHR, the Human Rights Council and the UN human rights mechanisms (Special Procedures and the treaty body system) and the processes and mechanisms established by the WSIS and the GDC. This includes the Data Governance Working Group under the CSTD, since data governance is fundamental to the operation of any AI system, and therefore should be developed in line with human rights, including the right to privacy and data protection principles.

The Dialogue should also establish clear connections with the ongoing work of UN agencies and entities. Specifically, we highlight the extensive work of the OHCHR and the UN human rights mechanisms to apply and support the effective enforcement of international human rights law in the context of AI governance. Close connection with the OHCHR and mechanisms will be essential to achieving progress in thematic cluster 4(e).

The Dialogue should also establish clear links with the multistakeholder mechanisms developed under the WSIS, such as the Internet Governance Forum (IGF) and its wider ecosystem of National and Regional Initiatives (NRIs). The global IGF in December 2026 will take place at the mid-point of the two Dialogues, making it an ideal venue for evaluation of the outcomes of the 1st Dialogue, and preparation for the 2nd Dialogue. As mentioned in question 17, the

outcomes of NETmundial and NETmundial+10 should also be used to guide the Dialogue's design.

Finally, the Dialogue may also leverage the learnings from prior governance global processes such as the climate process, where the IPCC has been integral to catalysing decentralised action.

## Inclusive participation

**15. How can different stakeholders contribute to the AI Dialogue?  
Please share recommendations for the format and structure of the AI Dialogue.**

The Global Dialogue should facilitate robust, meaningful and continuous engagement by civil society and other stakeholders. We reinforce the procedural recommendations made in the 'Letter to UN AI Global Dialogue Co-Chairs', signed by more than thirty organisations:

<https://www.derechosdigitales.org/en/recursos/letter-to-un-ai-global-dialogue-co-chairs-procedural-recommendations/>.

We reinforce two, overarching recommendations:

1. Implement formats that effectively protect and promote meaningful multistakeholder throughout the Global Dialogue: Participation mechanisms should be well-structured, facilitating early and ongoing consultation throughout the design, deliberation and implementation phases of the Global Dialogue. Formats should allow non-governmental and governmental stakeholders to respond to each other in real time, rather than purely ad hoc and non-dialogue formats. Feedback loops should be established to demonstrate how contributions influence decisions: this requires cyclical reporting on the contributions received, how they were or were not incorporated into the Dialogue's outputs, and signalling areas of ongoing consultation. Concretely, enhanced engagement may be achieved through focusing Thematic Discussion sessions on specific pre-identified topics, identified through consolidation of consultation input. Thematic Discussions could be linked with intersessional Working Groups, designed to ensure follow-up and transmit the Dialogue's outcomes to other UN fora, such as the IGF.

2. Ensure all stakeholders, and specifically traditionally excluded groups, have the necessary information, resources, skills, and equitable access to meaningfully participate in the Global Dialogue.

This involves centralising all information, providing timely notice and sharing of calls for inputs or consultation events, clearly communicating timelines and milestones for input, and making use of satellite and other intersessional mechanisms to convene diverse stakeholders. It requires elevating the voices of traditionally excluded or underrepresented groups, ensuring hybrid and accessible formats, offering financial and logistical support to aid participation, and taking concrete steps to ensure accessibility. Member States should host national consultations to shape their national positions.

## **16. Which voices, communities, or perspectives are currently underrepresented in global discussions on AI governance? How could they be included?**

Global discussions on AI governance must ensure meaningful participation of civil society, women human rights defenders, LGBTQIA+ rights advocates, labour organisations, and communities in the Global Majority across the entire AI policy cycle, including from agenda setting to design and deployment, as well as evaluation and assessment frameworks.

Concerted effort should be made to engage affected communities and provide necessary accommodation to enable them to participate fully in the Dialogue. We reinforce again the procedural recommendations made in the ‘Letter to UN AI Global Dialogue Co-Chairs’, signed by more than thirty organisations, specifically the recommendations on elevating traditionally excluded voices:

<https://www.derechosdigitales.org/en/recursos/letter-to-un-ai-global-dialogue-co-chairs-procedural-recommendations/>.

To ensure meaningful inclusion of underrepresented actors, we specifically emphasise the need to:

1. Convene support from government and non-government actors to offer financial and logistical support on the basis of need.
2. Ensure hybrid modalities for the Global Dialogue and all related meetings and consultations. Ensure that consultations accommodate different time zones and working days and provide low-bandwidth participation options.
3. Promote gender balance and intersectional representation.

4. Ensure security through measures to prevent, monitor, and redress any reprisals and intimidation for collaboration and participation in the Global Dialogue both online and in-person.
5. Promote inclusive and accessible participation by giving due consideration, when selecting host countries and venues, to conditions that enable the safe, non-discriminatory, and barrier-free participation of all stakeholders, including those who may face challenges related to visas, mobility, or immigration policies.

## 17. What innovative engagement formats could most effectively foster meaningful and dynamic engagement during the AI Dialogue?

While welcoming the need for innovative approaches, we also emphasise the need to use tried and tested methods to ensure meaningful and inclusive engagement. The NETmundial+10 Multistakeholder Guidelines clearly articulate working methods to deliver improved coordination and information sharing within multistakeholder and multilateral digital governance processes. The Dialogue can also build on and strengthen existing practice from other UN processes, such as the WSIS+20 process. Finally, we highlight again the ‘Letter to UN AI Global Dialogue Co-Chairs’ as a set of practical recommendations to fully operationalize the principles of inclusivity, transparency, and meaningful input throughout the Dialogue’s design.

In addition to the above, we recommend adopting the following modalities:

1. Convene thematic, cross-sectoral and sector-specific consultations with the Co-Facilitators, Secretariat and the non-governmental stakeholder community early in the process and on an ongoing basis to provide feedback to the development of the Co-Chair summary Outcome and other outputs.
2. Appoint a civil society representative liaison to support the Co-Chairs to facilitate meaningful multistakeholder engagement ahead of, during, and following the Global Dialogue. Consider leveraging the support of this liaison when drafting the Co-Chair Summary Outcome of the Global Dialogue (see e.g. the Multistakeholder Advisory Group of the IGF and the WSIS+20 Informal Multistakeholder Sounding Board).
3. Structure session formats that allow civil society and other non-governmental and governmental stakeholders to respond to each other in real time. There should be a minimum of 50% rotating time allocated for non-governmental stakeholders to engage in dialogue with each other and with governments.
4. Focus Thematic Discussion sessions on specific pre-identified topics using the

consultation input consolidation. Consider linking Thematic Discussions with intersessional Working Groups to ensure follow-up and transmit the Dialogue's outcomes to other UN fora, such as the IGF.

## Good practices and policy approaches

### 18. Please share examples of policies, practices, platforms, or approaches that promote effective AI governance or offer concrete solutions to addressing its challenges.

As earlier mentioned, extensive work has been conducted by the OHCHR and the UN human rights mechanisms (UN Special Procedures and the treaty body system) to provide assistance to apply and enforce international human rights law to the internet and digital technologies, including AI. The General Assembly and the UN human rights system have produced specific guidance related to the prohibition of unacceptable AI applications. The Dialogue has the opportunity to draw renewed political attention to this work and build on it.

The Dialogue should also benefit from the considerable, previous work undertaken by other multilateral bodies. Particular attention should be paid to the efforts of the Council of Europe to develop a human rights, democracy and rule of law-oriented regulatory framework for AI, one of the few explicitly rights-based regulations in this field, in particular its methodology for the Risk and Impact Assessment of Artificial Intelligence Systems from the Point of View of Human Rights, Democracy and Rule of Law (HUDERIA).

Lastly, one last good example is the development of content provenance standards through the Coalition for Content Provenance and Authenticity (C2PA). The multistakeholder coalition establishes interoperable technical specifications that allow digital content – especially AI-generated or edited media – to carry verifiable metadata about its origin and modification history. This approach can directly address the erosion of trust caused by misinformation and synthetic media by enabling users and platforms to assess the authenticity and provenance of audiovisual content at scale.

The unique value of the Dialogue is the opportunity it provides to build coherence across the UN system and wider AI governance discussions, fostering greater

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coherence across AI governance in a manner consistent with international law, including international human rights law.