

To,  
The Honourable Chief Election Commissioner  
Election Commission of India  
Nirvachan Sadan, Ashoka Road,  
New Delhi - 110001

Sir,

Subject: Urgent need for intervention on generative AI and manipulated media content to uphold electoral integrity

The emergence of deepfake technology, which enables the creation of highly realistic and difficult-to-detect manipulated media, poses unprecedented threats to the sanctity and integrity of our electoral processes. We recently held an experts' discussion on digital interference in India's forthcoming national elections - 'Ballots and Bots: Elections 2024 In a Digital World' on March 7th, 2024. Here, experts deliberated on the potential influence of IT cells of political parties, misinformation, deep fakes, and AI-powered audio and video manipulation during the upcoming general elections in India.

The Election Commission of India (ECI), as the apex body mandated to conduct free and fair elections, has a constitutional obligation to safeguard our democracy from any form of external manipulation or influence. Under Article 324 of the Constitution of India, the ECI is endowed with plenary powers to direct, control, and supervise all electoral processes, ensuring their conduct in a free and fair manner. This includes the authority to make necessary interventions to address emerging threats that can undermine the fairness of elections.

In light of the recent surge in instances involving deep fakes, which can be exploited to spread misinformation, impersonate political figures, and manipulate voter perception, the ECI must take decisive and urgent action. Such manipulated media distort public discourse and threaten to erode trust in our democratic institutions and processes.

Therefore, we respectfully urge the Election Commission of India to:

1. Direct intermediaries and platforms to identify systemic risks related to electoral processes. They must reinforce internal processes to identify and implement reasonable, proportionate, and effective mitigation measures.
2. Intermediaries and platforms must set up an internal task force for elections-specific risk mitigation measures. The team should cover areas relating to cybersecurity, threat disruption, content moderation and disinformation.

3. Intermediaries and platforms must implement reasonable, proportionate, and effective mitigation measures tailored to risks related to the creation and dissemination of generative AI and manipulated media content.

These measures may include:

- a. access to official information on electoral processes,
- b. media literacy initiatives,
- c. fact-checking labels and providing more contextual information,
- d. tools and information to help users assess the provenance of information sources.
- e. ensure that generative AI and manipulated media are clearly distinguishable for users and labelled as such.

The Election Commission's proactive engagement in directing platform companies to enhance their policies against manipulated media is crucial in maintaining the integrity of our electoral processes. Such measures are essential to ensure that elections in India remain free from manipulation, thereby upholding the democratic principles that are the cornerstone of our nation.

Thank you for considering this urgent and important matter.

Sincerely,

[in alphabetical order]

**Organisations:**

Access Now  
Internet Freedom Foundation  
Software Freedom Law Center, India

**Citizens:**

Abhishek Baxi  
Abhishek Bhatt  
Amar Kumar  
Amit Kumar Ukey  
Ashish Asgekar  
ASHISH GUPTA  
Asif  
Gurumurthy Kasinathan  
Jahnabi Mitra  
Kanika Saxena  
Kuldeep Nakra

Mayank  
Nimitt Dixit  
Osama Manzar  
R Swarnalatha  
Radhe Shyam  
Rahul Batra  
Rai Vikrant  
Ratna Singh  
Rishi Seth  
Ritobhash  
Romil  
Shrikrishna Kachave  
Shuvam  
Vickram Crishna  
Vishal Singh