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Re: Medical disinformation on Facebook, Instagram, TikTok, Twitter, and YouTube

Your platforms are currently enabling, and profiting from, the spread of dangerous medical disinformation about the FDA-approved drugs mifepristone and misoprostol, which are used in the FDA-approved regimen for medication abortion care. These drugs have a long track record of scientific study and safety.

Facebook, Instagram, TikTok, and YouTube are proliferating inappropriate and inaccurate information encouraging people not to follow the FDA-approved regimen for abortion. Failing to use these medications properly puts people at risk of serious complications, even though the drugs are very safe when used as directed. We urge your companies to take immediate action to remove medical misinformation and disinformation across all languages and to promote correct medical information.

Any medical disinformation is a threat to public health and the safety of users on your platforms. Particularly with the Supreme Court decision in *Dobbs v. Jackson Women's Health Organization*, which overturned landmark abortion rights cases *Roe v. Wade* and *Planned Parenthood v. Casey*, the need and urgency to remove medical disinformation--especially about medical care for abortion--and direct users to accurate, science-based information is critical. Your platforms must take immediate steps to:

- Remove harmful medical disinformation about abortion care, including disinformation on mifepristone and misoprostol, and deplatform accounts that continue to post this harmful content.
- Link to medically accurate information to provide correct, scientifically sound medical information about these prescriptions, similar to what your companies have done in response to / to address COVID disinformation.
- Expand disinformation policies to include bans on medical disinformation, including abortion disinformation.
- Implement these policies across all languages used on your platforms.

Since the Supreme Court decision, as in other major political and news moments, people are turning to social media to gain comprehension of their rights, legal and political landscape, and the news writ large. This creates a saturated information ecosystem. In any information ecosystem, we must ensure and establish guardrails to prevent disinformation from spreading and harming people. In particular, those who already face disproportionate barriers to accessing quality health care and health care information are the ones most at risk of being targeted with disinformation campaigns.

Medication abortion care and accurate information on your platforms are vital resources for those disproportionately impacted by the recent overturning of *Roe v. Wade* and *Planned Parenthood v. Casey*. These include Black, Indigenous, and People of Color; Black and Brown women; LGBTQ+ people; disabled people; working class and poor communities; rural communities; immigrants; non-English speakers; and more. Systematically oppressed communities, especially Black and Brown communities, are disproportionately targeted with medication disinformation on your platforms. Black people already face systemic barriers to accessing quality sexual and reproductive health care information, and that gap will continue to grow with this recent ruling.¹ Disabled people who need care and are living in states that have now severely limited or banned abortion need access to accurate information online about where to travel or how to order medication abortion pills. Abortion disinformation and broader medical disinformation targeting LGBTQ+ people will make it increasingly difficult for these communities to seek out care and be treated with dignity and respect when they do.

Medications do not reach patients by chance. They are rigorously studied, approved, and continuously reevaluated by the FDA.² The agency is "responsible for protecting the public health by ensuring the safety, efficacy, and security of human and veterinary drugs, biological products, and medical devices; and by ensuring the safety of our nation's food supply, cosmetics, and products that emit radiation."

The prescription drugs mifepristone and misoprostol have been approved by the FDA for over 20 years as a non-invasive option to end an early pregnancy and safely manage miscarriage. The same medications have been available in France, Sweden, and the United Kingdom since the late 1980s and early 1990s, providing a long history of safe use.³ This safe, effective, evidence-based regimen has a 95% success rate, and less than 0.5% of patients experience serious complications.⁴

These medications are also FDA-approved to be used separately to safely treat other medical conditions: Mifepristone is used to treat high blood sugar in Cushing's syndrome patients,⁵ and misoprostol to prevent stomach ulcers.⁶

¹ An Anti-Vaccine Film Targeted To Black Americans Spreads False Information.

² FDA's Drug Review Process.

³ Mifepristone for Early Medical Abortion: Experiences in France, Great Britain and Sweden | Guttmacher Institute

⁴ Medication Abortion | Guttmacher Institute

⁵ Mifepristone for management of Cushing's syndrome.

⁶ <u>Misoprostol Oral: Uses, Side Effects, Interactions, Pictures, Warnings & Dosing - WebMD.</u>

In 2021, the FDA decided to permanently allow access to mifepristone by mail after the "agency conducted a comprehensive review of the published literature, relevant safety, and adverse event data"--again demonstrating the safety of this medication. A comprehensive report from the National Academies of Science, Engineering, and Medicine (NASEM) in 2018 further confirmed these medications' safety.

Mifepristone stops pregnancy growth by blocking the hormone progesterone. Misoprostol, taken at a later time, makes the uterus contract. This process is called a medication abortion. This safe and non-invasive measure already accounts for more than half of all U.S. abortions each year.⁹

However, thousands of posts across Facebook, Instagram, TikTok, Twitter, and YouTube have attempted to politicize what is and should remain a matter of medical and scientific fact. These posts try to stoke fear, division, and judgment by claiming that these FDA-approved and provider-prescribed medications are unsafe, calling them "deadly," "dangerous," and "chemical," falsely claiming they pose "serious health risks," and describing medication abortion as "death by mail."

Your platforms' willingness to participate in undermining the trust and efficacy of the FDA, an agency whose work is vital to the safety of all foods and medications our families and communities rely on, is deeply concerning, especially amid a global pandemic. Through your platforms, you are not only enabling the spread of medical disinformation and undermining a critical safety-related government agency, but you are actively profiting from spreading these falsehoods through paid ads that have reached millions of people, including minors.

In addition, your platforms have allowed both organic and paid promotion of potentially life-threatening claims about a dangerous and medically unproven procedure known as "abortion reversal." Abortion "reversal" is a non-medical term used by those who are anti-abortion to describe a medically unproven protocol in which a high dose of progesterone is given after the first of the two medications are administered. This has not been well studied and relies on experimental treatment that does not follow standard research protocol. Proponents of so-called "reversal" rely on case series, the lowest level of evidence. Case series cannot prove cause and effect. In December 2019, the results from the first randomized control study (the highest level of scientific study) on abortion "reversal" were published. 10 This study had to be ended early because of significant safety concerns about the so-called reversal regimen, namely heavy bleeding that in some cases required blood transfusion and even emergency surgery. The study concluded that the efficacy of progesterone for nullifying the effects of mifepristone could not be estimated due to these significant safety concerns. Notably, the American College of Obstetrics and Gynecology (ACOG), which publishes practice guidelines for OB-GYN care, including abortion, does not recommend the practice, stating that "claims of medication abortion reversal are not supported by the body of scientific evidence, and this

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⁷ FDA to permanently allow abortion pills by mail, a major win for advocates

⁸ The Safety and Quality of Abortion Care in the United States IThe National Academies Press.

⁹ Over half of US abortions done with pills, survey finds

¹⁰ Provider letter medication abortion

approach is not recommended in ACOG's clinical guidance on medication abortion." As shown by the failed study, this approach is not safe or effective, nor is it based on medical evidence.

Promoting untested theories across social media is not safe--it's life threatening and has the potential to cause people to try this dangerous method on their own.

The use and prescription of FDA-approved prescription mifepristone and misoprostol is not a political issue. It is not about left or right; it is about the inherent and potentially life-threatening dangers of allowing false medical information to overrun your platforms, undermining patient safety and the authority and trust of the FDA. Any medical disinformation is a threat to public health and safety.

Allowing this information to continue unchecked and even profiting from paid advertisements that reach millions of people, including minors, is not only irresponsible corporate behavior, it is also clearly in breach of each platform's policies that prohibit the promotion, sale, or use of unsafe products or inappropriate use of regulated products--in this case, prescription medications, especially to minors.¹¹

The Supreme Court's ruling to overturn *Roe v. Wade*, the landmark decision that constitutionally protected the right to privacy and an abortion in the U.S., will only confuse the information landscape and further politicize what should be a medical issue. We urge you to take immediate action to limit the spread and reduce the harms of medical disinformation about mifepristone and misoprostol: Remove disinformation, link to accurate medical information, and expand disinformation policies to include a ban on medical disinformation.

Thank you! We look forward to your taking swift action to address this dangerous threat to public health.

UltraViolet and Physicians for Reproductive Health

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¹¹ Endangering Women for Profit. Center for Countering Digital Hate

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If/When/How: Lawyering for Reproductive

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National Organization for Women (NOW) -

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National Partnership for Women & Families

Network for Long COVID Justice /

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