

# Public comment by LatamChequea on Meta's Plan to Expand Community Notes

LatamChequea is a network of organizations focused on countering disinformation through fact-checking, media literacy initiatives, the development of civic technologies, and other strategies. Our aim is to provide citizens with the best possible information through our journalistic work while helping them acquire the tools and skills needed to navigate the information ecosystem. The [network](#) includes 48 organizations in 21 countries.

In this context, we welcome the inclusion of Community Notes as a complement to other interventions, but as we have previously pointed out to the Oversight Board, we do not believe they are a sufficient tool to counter the spread of misinformation on Meta's platforms in Latin America. **Community Notes can play a constructive role in encouraging participatory accountability. However, they are not a reliable substitute for independent, professional fact-checking.**

## Effectiveness of Fact-Checking

Fact-checking has demonstrated a concrete effect in [curbing the spread](#) of misinformation and [helping people](#) correct erroneous views on specific subjects, without threatening freedom of expression. It functions as additional information that people can use, while fact-checkers do not censor or remove content. In the context of the Third Party Fact-Checking program, the initiative has also shown [low error rates](#), according to the company's data. The program has one clear strength: the ability to reach people who already saw the misinformation. Fact-checking can intervene rapidly on high-impact, high-stakes narratives where Community Notes struggle to reach consensus.

Fact-checking organizations that follow established international standards, including those modeled on the International Fact-Checking Network (IFCN), publish detailed disclosures about their funding, methodology, editorial processes, and conflict-of-interest safeguards. Their procedures are designed to ensure neutrality and methodological consistency, and are routinely reviewed by external bodies.

## Community Notes Limitations

In contrast, Community Notes, based on available evidence from their implementation on X, have several significant shortcomings. The process is slow. Although it has accelerated over the years, it still [takes an average](#) of 14 days for a note to appear on a post, which far exceeds the normal viral cycle of content. By the time the note is added, most people have already been exposed to the misinforming content and will not see the additional information.

The requirement for consensus among people who have previously disagreed means that notes on controversial subjects—often the most relevant—are less likely to be published.

Additionally, there is a stark disparity in the number of notes published in English versus other languages. For example, on X, 64% of [notes](#) are in English, while only 9% are in Spanish.

The wisdom of crowds could be a powerful tool for improving the information ecosystem. However, as implemented through Community Notes, it does not address what has been signaled as a shortcoming of fact-checking -the lack of scalability- since very few notes are ever published. Instead, it adds new problems such as slowness, lack of reliability, and the possibility of the system being gamed by organized groups that can block consensus.

## **Latin America's Unique Challenges Make Community Notes Particularly Inadequate**

Beyond these general considerations, there are specific factors that make Latin America particularly ill-suited for a widespread rollout of Community Notes. The region today faces deepening democratic decline, restricted access to public information, high levels of socio-political polarization, widespread media deserts, and persistent gaps in media and information literacy. Under these circumstances, evidence indicates that Community Notes would systematically underperform in the region: fewer notes published where they are most needed (politics, elections, public health, security), slower correction cycles, and lower coverage of non-English content.

In the context of growing autocratization, particularly in countries where journalists, activists, and citizens face intimidation or persecution, contributors are unlikely to feel safe rating or writing notes that challenge powerful political or economic actors. Fear of retaliation undermines the participation and ideological diversity needed for the program to function effectively. Moreover, growing polarization prevents the consensus required for the system to work.

Limited access to public information and lack of governmental transparency also mean that citizens face serious limitations in their ability to contrast claims made on social media with reliable and accessible facts. This situation is exacerbated by media deserts. In countries where [systematic studies](#) have been conducted reveal significant territories where no local media exist, meaning there are severely limited sources from which citizens can draw information. In such contexts, the informational sources needed for Community Notes to work -robust, diverse, independent, and timely local reporting- is simply not available.

It is also important to consider the socioeconomic context in Latin America, which can significantly impact the program's effectiveness. With high poverty levels and serious educational deficits -average PISA [results](#) are well below the OECD average- , it is difficult to envision how a program requiring high levels of media literacy from significant portions of the population could be successfully rolled out. **In contexts where basic connectivity,**

**schooling, and literacy are not guaranteed, relying on crowdsourced annotation to correct complex misinformation is unrealistic.**

## **The Need for More Solutions, Not Fewer**

Misinformation is a growing problem that has only worsened in recent months with the widespread use of AI tools to generate highly realistic images, audio, and videos that are deceiving millions. Given the scope of the problem, more tools and solutions are needed, not fewer. There is no evidence showing that Community Notes would work better than fact-checking, whereas abundant evidence demonstrates that fact-checking is a contributing factor in protecting people from misinformation.

In Latin America particularly, with fragile democracies -in some cases autocratic regimes- limited access to information, high polarization, and large parts of the territory with “news deserts”, it is even more concerning that a Community Notes system could replace fact-checking.

**Removing Third Party Fact-Checking and relying solely on Community Notes would increase, not reduce, the spread and harm of misinformation.**

**LatamChequea recommends that Meta:**

1. **Maintain and strengthen Third Party Fact-Checking** globally, and particularly in Latin America, with particular attention to electoral cycles and crisis coverage.
2. **Pilot Community Notes only as a complementary tool**, under strict safeguards, with geographic and topical restrictions and full transparency.
3. **Use regional, independent expertise** -including networks like LatamChequea- to evaluate risks, design guardrails, and interpret data from pilots.
4. Treat Community Notes as an **experimental, supplementary layer**, not as a replacement for structured verification and professional editorial judgment.