

Response from members of civil society to the draft Chair's Statement at the Global Conference on CyberSpace (GCCS)

Based on version 5.0 of the Chair's text dated 2 April 2015

Introduction:

This letter has been drafted by a group of civil society members as the result of civil society consultations that took place between 2 and 10 April. It reflects and builds on the comments submitted by groups and individuals in response to the open call for input to the draft Chair's Statement that was issued by the [GCCS Civil Society Advisory Board](#). It does not represent all the views within civil society.

We appreciate the opportunity to comment on the Chair's text. We have circulated the early draft among civil society networks working on internet governance, and have drawn responses and suggestions from 19 civil society organizations and many more individuals. These suggestions were compiled in the attachment to this letter, and we provide them for consideration by the Conference Chair.

We would also like to draw the attention to the following points which we would welcome the opportunity to discuss further, as they are considered along with other stakeholder inputs (which we have not had the opportunity to evaluate and respond to).

General comments on the GCCS Chair's Statement:

We thank and support the Government of the Netherlands for their efforts to take substantive steps in increasing the openness and inclusiveness of the London Process through the Global Conference on CyberSpace (GCCS) in The Hague, and the commitment to improving multistakeholder participation. We look forward to continuing this process during the meeting and at future conferences to ensure that participation from all stakeholder groups becomes more inclusive and transparent, and particularly more representative of people from developing economies.

Global Forum on Cyber Expertise (GFCE)

We would like to see further information regarding the GFCE and be assured that any Forum includes adequate representation of civil society from all regions of the world. In particular: Will the Forum only focus on developing the capacity of state actors and private sector? How will the Forum contribute to and achieve the multi-stakeholder approach which is a desired outcome of the GCCS? Will the GFCE duplicate or complement the NETmundial, IGF, and other spaces? How will the increased burden on stakeholders from developing countries to engage in this new space be mitigated?

Internet as a public good

We note that through out the document there is a consistent characterization of the internet as a space for economic growth, but not as a public good. We believe the internet is not only an economic opportunity, is a public good to be managed in public interest.

Specific comments on the GCCS Chair's Statement:

A compilation of all the comments received from civil society members during the open consultation process are in the attachment to this letter, but we wish to highlight the following specific points that were consistently repeated in many of the submissions:

Paragraph 11

We strongly support the recognition of the 'privacy by design' principle, and the economic and security impacts of such an approach. Privacy should be designed into all layers of the technology stack and all elements of the ecosystem — and by doing so, protecting the users and the systems they depend upon.

Paragraph 12

Civil society members have a number of concerns as regards the IANA transition process. However, there is no consensus "that sufficient time should be given to complete and test the new mechanism" - a vague concept that does not reflect the efforts of those working to meet the target dates - and we suggest removal of the sentence that includes the suggestion that consensus exists on this subject.

Paragraph 14

We suggest the addition of the following words to complete the paragraph: "governments and state security agencies should never undermine the fundamental security of the Internet infrastructure" The statement should indicate in ¶¶ 14, 17 at minimum) the importance of governments refraining from acting to undermine the security of communications technology or threaten the right to communicate anonymously. Governments should never undermine encryption standards or mandate lesser encryption protocols. These "back doors" put all users and society at risk and make it easier for criminals and other bad actors to gain access to sensitive user data, whether of individuals, businesses or governments.

Paragraph 20

The statement "The Internet connects everything" is simply wrong while 4.5 billion people have no connection whatsoever. We suggest qualifying this (eg by "In areas where connectivity is strong" or removing this phrase altogether.

Paragraph 23

This paragraph would be complemented by a reference to the International Principles on the Application of Human Rights to Communications Surveillance (Necessary and Proportionate Principles - <https://en.necessaryandproportionate.org>)

Paragraph 33

We would like to begin this paragraph with the words "Unequivocally, we believe the internet should be a demilitarized space". We believe that all sensible attempts to address this problem must begin by adopting this basic and necessary principle.

Paragraph 35

We applaud the understanding in this paragraph that "the protection of human rights and security online are complementary concepts." Undermining human rights with reactive and restrictive

legislation will not improve security, it will undermine it. That being said, we have a number of concerns to strengthen this fundamental understanding of the centrality of human rights in this area, contained in the attachment to this document.

We would welcome the opportunity to explain these suggestions further, and also to contribute further towards the evolution of the Chair's Statement.

Sincerely,

This document has been compiled by an ad hoc group of civil society members, coordinated by the [GCCS Civil Society Advisory Board](#). The group considers this document to be a non-endorsed draft input with the aim of assisting the organizers of the GCCS in the formation of the Chair's Statement.

ATTACHMENT - CONSOLIDATED CIVIL SOCIETY INPUT

The comments below are those made by members of civil society during an open consultation process that took place between 2 and 7 April. Their inclusion here does not constitute endorsement by the drafters of the letter. This paragraph by paragraph consolidation of the comments was undertaken to provide the fullest sense of the scope and diversity of the civil society inputs and to facilitate their review by those persons collating stakeholder inputs to the Chair's Statement.

PARAGRAPH BY PARAGRAPH COMMENTS

PARA 1 – no comments

PARA 2 – suggested changes

- The first sentence is about ICT in general, internet in particular. The last sentence is about internet ONLY. The notion that 95% of ICT is NOT internet(ted) shall not be lost. Therefore: split these two notions describing two different domains.
- including - **but not limited to** - governments, the private sector, .
- Academia could be added to the stakeholder groups (and also mentioned where the other stakeholders are mentioned further down in the text)
- The term "governed" through a partnership between all involved stakeholders is misleading. Even if we want to foster multistakeholder processes, the term "governed" cannot be applied to private sector and other stakeholders. Perhaps use "managed"

PARA 3

- Suggest "security of ICT and of our ICT infrastructure"
- Remove words "global community". Comment received was "We are not global, and we are not a community in the sense that that implies "togetherness".

PARA 4

- 'fundamental rights' should be changed to 'human rights' and the 'right to privacy' should be added.
- "we must also remain vigilant to those who abuse these rights and ensure that such abuse is addressed within the framework of the rule of law". I think this phrase can be misunderstood, governments might consider the expression of political opinions or what is written by activists and journalists about government corruption as abuse of rights, so we should define it more.
- Suggest that the phrase rule of law be supplemented throughout by "and in a manner that is consistent with human rights" or words to that effect.
- Statements about "unequivocal" support for free expression rights are immediately qualified with language about the "abuse" of such rights. Either the rights are unequivocal or they are not. If it is a right, it is not an abuse to use it. Concerns about crimes or violations of other rights should not be linked to free expression or privacy rights, they simply should be targeted as crimes.

PARA 5

- Add after first sentence " We must ensure that all perspectives are considered".

PARA 6

- Add multistakeholder so as to read “strengthen international MULTISTAKEHOLDER cooperation in the cyber domain”
- That these paragraphs actively encourage more collaboration between state and private sector actors in the prosecution of citizens is problematic without qualifiers that protect users from massive, disproportionate and unnecessary surveillance or straightforward violation of human rights.

PARA 7

- Please avoid the "Cyber Domain" and stick to your Cyber Space. Cyber Domain raises in some heads the bells of the Domain Names System (DNS), right now under heavy swells because of the IANA Stewardship Transition.

PARA 8

- Various respondents suggested dropping the reference to “products and services” as we do not know what these are. One comment stated “Is a conference on cyberspace organized by governments meant to encourage the commerce of certain products? If so, based on what criteria or certification?”

PARA 9

- Under economic growth and social development need to 1) reflect the importance of cultural diversity, local content and local languages; 2) reflect need to bridge the digital divide; and 3) the economic and social consequences of terrorism
- Add words “privacy, security, and development issues” after “trust, education”
- The section related to "Economic Growth" lacks a clear reference to a more fair distribution of the economic benefits of the information society. This could easily be included in paragraph 9: "(...) the right policy frameworks that promote innovation, competition, investment and a more fair and balanced distribution of economic benefits of the information society are in place".

PARA 10

- Delete word “furthermore”
- Underlining the importance of the post-2015 agenda is not very useful. Instead, governments and private sector should commit to actually supporting universal internet access in the post-2015 negotiations, which are taking place right now

PARA 11

- change "mankind" to "humankind"
- insert “as well as significant concerns” after humankind.
- We approve the recognition of the ‘privacy by design’ and the economic and security impacts of such an approach. Privacy should be designed into all layers of the technology stack and all elements of the ecosystem — and by doing so, protecting the users and the systems they depend upon.
- This is only about economic development, not about social development at all.

PARA 12

- Delete reference to “**consensus** that there be sufficient time given” See comments below – there is no consensus on this vague notion
- Add at the end: "The Conference expects that future mechanisms will be democratic and recognize the respective roles and responsibilities of all stakeholders."
- It is good to recognize the importance of the IANA transition, but Paragraph 12 is not a useful intervention. It does not engage with any of the real issues of the transition, emphasizing instead "sufficient time" (this is an argument used by some people who don't want it to happen) and "testing" new mechanisms. (IANA/ICANN accountability is part of the real world, not a laboratory, there can be no "tests.")

PARA 13

- Delete “furthermore” (the word furthermore is only to be used orally; it denotes and “afterthought”. As this is in writing, even a pre-thought, furthermore shall not be used and be deleted)
- Since there is no one approach, "multi-stakeholder approach of Internet governance" should be "multi-stakeholder approaches of Internet governance".
- Insert “democratic” so as to read “democratic multi-stakeholder approaches”
- Insert as second sentence “Delegates also expressed their support for the NetMundial Principles developed in Sao Paulo in April 2014”

PARA 14

- Insert as sentence 5 in paragraph “Governments and state security agencies should never undermine the fundamental security of the Internet infrastructure”
- Replace the word consumers with either 'citizens' or 'users'
- remove the words “their own role, as well as” - all stakeholders have a shared interest.
- Add at the end: "The externalities arising from lack of cyber security must be explicitly recognized and addressed."
- We in developing countries we mostly go for Chinese affordable hard wares or soft wares even if they are not secure enough. So you find that we are driven by affordability and not quality.
- Paragraph 14 is good in theory, but it has not real impact if the hardware and software cannot be scrutinized.

PARA 15

- The emphasis on traditional and formal education excludes a large portion of the world, and ignores their context-specific security needs.

PARA 16

- add civil society
- replace “between governments, businesses and science” with “among all stakeholders”
- add at the end: "As a concrete first step towards increased cooperation, all states are invited to accede to the 2012 International Telecommunication Regulations, which call for such increased cooperation and for the respect of human rights."

PARA 17

- add as final sentence in paragraph “all actors refrain from any actions that undermine the integrity of cyber systems”.
- Delete “it shows that the multi-stakeholder approach works”

- It is unclear whether "security breaches" encompass the privacy and data protection risks including - unauthorised access, destruction, use, modification or disclosure of data. There is a need for further clarity on this point to provide further information as to which stakeholders have a role and responsibility in preventing security breaches.

PARA 18

- Insert at end "State agencies must not intervene in standards discussions in order to weaken security standards, in particular encryption standards."
- RFC 2728 has nothing to do with DDoS attacks, it is about a method for broadcasting Internet data over a television signal for reception by client devices..This should read RFC2827
- "Good examples of such a dialogue can be found in the BCP38 (RFC2728) standard that has the purpose to defeat Denial of Service attacks." This sentence is very inconsistent and very detailed as compared to the other outcomes. If this level of detail is used, at least point to the GCCS2015 Sharing cyber security information good practice deliverable as well.

PARA 19

- The statement rightly considers the need for more mature Computer Security Incident Response Teams (CSIRTs), however, the language should also specify that such organizations have a heightened responsibility to protect the privacy of the users dependent on CSIRTs assistance.
- there needs to be greater recognition of the need for assistance for nations whose CSIRT programs are in their infancy
- remove "to increase their maturity" from the last sentence - it sounds condescending

PARA 20

- "The Internet connects everything" is simply wrong while 4.5 billion people have no connection whatsoever. We suggest qualifying this (eg by "In areas where connectivity is strong") or removing this phrase altogether
- The statement should embrace a move toward a user-centric approach to cybersecurity. Namely, it should clarify that cybersecurity is about protecting the entire security ecosystem, starting at the user, and not only about critical infrastructure or national security. Laws and practices should not be antithetical to meaningful data security). All users are entitled to due process and protections under the rule of law before personal data is accessed. The statement should recognize that a user has rights in his or her data and a level of control over its storage, use, and deletion.

PARA 21

- Add at end of paragraph "However, inter-state and state-corporate cooperation should never be used to support actions under criminal laws that do not meet international human rights standards, or to facilitate procedures that fail to meet international standards of criminal procedure and investigation, or fair trial.
- modify the third sentence so that it reads: "Up to date legislation is a first requirement; such legislation must respect the principles of necessity and proportionality."
- I support 21, 22, and 23 but in order for this to be effective we need to treat the Internet FIRST as a Global Resource. Once we accord such a treatment to the internet then we can develop universal laws governing it rather than depending on each nation's laws which might be compromised with at any time just like what we have been seeing in conflict regions where internet is switched off, etc
- "Both in their own country and across national borders. the notion that providing footprint in nation A for use by criminals attacking only other nations B... Z and thus may be no criminal offence in

nation A may be under addressed here by the text; i.e. the responsibility for safe and secure other nations shall be highlighted more.

- We want to specifically voice our concern that protection of intellectual property is currently handled on an international scale between governments and the private sector that is beyond proportion. We believe this merits its own separate point in order for civil society to more specifically address their concerns.

PARA 22

- Add sentence at end "There will be a need for financial and technical assistance in some cases to enable countries to put in place legal instruments to combat cybercrime"
- This is too weak as it does not cover the juridical "commons (exception) areas" as cybercrimes committed on stations at the North and South poles and cyber attacks on the International Space Station (ISS).
- States should consider means of increasing mutual assistance, but should do so in such a way as to protect the rights of individuals whose information may be transferred. For instance, states should abide by clear processes for the exchange of information and should respect protections developed by other states as many mutual legal assistance treaties (MLATs) require.

PARA 23

- This paragraph would be complemented by a reference to the International Principles on the Application of Human Rights to Communications Surveillance (Necessary and Proportionate Principles - <https://en.necessaryandproportionate.org>)
- "based on article 35 of the Cybercrime Convention" Cybercrime Convention is signed mostly only by Europeans countries and ratified by few. It shall not be considered as a guideline.

PARA 24

- Believe the use of "malicious" to describe action in the International peace & security section is misleading. The real dangers posed under this rubric are not those stemming from "active ill-will" to use a dictionary definition, but rather from deliberate belligerent and damaging activity from state actors in pursuit of perceived national security interests. Don't obfuscate the nature of the threat to international peace and security.
- Paras 24, 25: It is unclear of the value of these paragraphs beyond reinforcing the perception that cyberspace is a target for increased government intervention, without reflection perhaps that it is government intervention that is disproportionately responsible for instability in cyberspace. We believe these paragraphs should simply be removed.
- Paras 24 and 25 should include a clear commitment to conflict prevention and an affirmation of the Internet as powerful tool for peace.

PARA 25

- Insert "developing" instead of "promoting" in front of norms
- Insert at end of paragraph "states should not engage in cyber attacks or the production and/or spread of malware. Mass surveillance by states must be ended; individual surveillance should be limited to what is necessary and proportionate."

PARA 26 - no comments

PARA 27

- This is unclear in terms of what is emphasized - state sovereignty or international obligations?
- We would welcome the addition of the following wording at the end of paragraph 27 - In particular, states should comply fully with their international human rights obligations under customary law and under human rights treaties to which they are a party, also in respect of any actions of their agents in cyberspace.
- Paragraph 27 is vague and concerning. Expressions like digital sovereignty have been used by some governments in a way that could lead to legal and technological fragmentation, although not necessarily inconsistent with international obligations.

PARA 28

- Amend to read “ how international law, <and international human rights law>, applies ... what remedies are available <to states, individuals and non-governmental organisations> for breaches of international law <and international human rights law.>

PARA 29 no comments

PARA 30 no comments

PARA 31 no comments

PARA 32

- For the entire point and sub-points, we urge the Chair to keep in mind the principles of Necessary and Proportionate when it comes to intelligence gathering against citizens. Specifically under (d), "harmful" should be defined and not left to interpretation.
- 32e the definition of "terrorism" may differ from nation to nation and is highly political (certain liberation groups we support are terrorists from another perspective); Better remove "and terrorist". In case it concerns crime is it anyway covered.

PARA 33

- We would like to begin this paragraph with the words “Unequivocally, we believe the internet should be a demilitarized space”. We believe that all sensible attempts to address this problem must begin by adopting this basic and necessary principle.
- We would suggest adding the following text at the end of paragraph 33: “and to ensure that they always operate within the international Rule of Law and in accordance with international human rights- and humanitarian law.”

PARA 34

- Add "technical community" to the explicitly mentioned list of stakeholders.

PARA 35

- We would suggest adding the following text to the end of paragraph 35: in ways that are fully compliant with international law and international human rights law
- in the last sentence 'and privacy' should be added after 'security'.
- Statements about "unequivocal" support for free expression rights are immediately qualified with language about the "abuse" of such rights. Either the rights are unequivocal or they are not. If it is a

right, it is not an abuse to use it. Concerns about crimes or violations of other rights should not be linked to free expression or privacy rights, they simply should be targeted as crimes.

PARA 36

- "Affirmed" should be "reaffirmed" and the sentence reconstructed to emphasise the protection of the right to privacy, online and offline as such: "Reaffirmed that same obligations that governments have to promote and protect the right to privacy offline, also apply online."
- Add to point 36 under Freedom and Privacy at the end: Citizens around the world should be able to use the Internet anonymously and without being subjected to mass surveillance by their own or other governments so that they can exercise these human rights fully.
- Add at the end: "and in accordance with the principles of necessity and proportionality."

PARA 37

- After the first sentence, add a new sentence: "The Conference recognized that states have the obligation to respect human rights universally, not just within their territory; consequently, they must refrain from actions that violate human rights both outside as well as within their territory."
- Add at the end: "and is in accordance with the principles of necessity and proportionality."

PARA 38

- We suggest adding the following text after "economic growth": "...and where both law enforcement agencies and security agencies operate within a framework of published national law that conforms to international law and fully respects international human rights law."
- Add the following after "economic growth" - "and allows the full enjoyment of fundamental freedoms and rights"

PARA 39

- A great deal of support was expressed welcoming the newly-established UN Special Rapporteur on the right to privacy.

PARA 40

- We suggest adding the following at the end: "In particular, state- and commercial secrecy should not impede the evaluation of fully-automated decisions and profiling, to ensure they operate fairly and without discrimination".

PARA 41

- We want to state that export controls is an ineffective tool for preventing ICTs used for human rights violations. Responsibility must lie with the private sector actors that use exploits for material gain for any purpose. If it can be proven in a court that they've been enabling human rights violations, they must be subject to justice.
- It was not very clear to me the point 41. I doubt very much whether we should make lists of users and buyers of ICT products. This can mean a monitoring by the government on the users. We encourage the use of licensed and approved products.

PARA 42

- Re 42, modify the second sentence so that it reads: "Governments were urged to ensure that cybersecurity policy at national, regional and international levels is developed through democratic multi-stakeholder approaches, ..."
- To follow a multi-stakeholder approach is not sufficient. NETmundial Multistakeholder Statement includes a section on "Internet governance principles", which includes other key principles for Internet Governance, such as transparency, accountability, inclusive and equitable, distributed and collaborative that enables meaningful participation.

PARA 43

- Request to add reference to the International Covenant on Economic, Social and Cultural Rights whose implementation also has an important role in ensuring fundamental rights and freedoms online.
- add at the end: "and consistent with the principles of necessity and proportionality".

PARA 44

- after 'investments' the following could be added: 'in infrastructure, open and interoperable protocols and free and open source software'

PARA 45 no comments

PARA 46 no comments

PARA 47

- Scope of the Forum remains unclear

PARA 48 no comments

PARA 49

- "the Global Conference on Cyberspace provides a unique multistakeholder platform" - what makes it unique?

PARA 50

- In the same way that the introduction includes a paragraph on the primacy of human rights, the closing of the document should also include a paragraph if not a reference to human rights. For instance, paragraph 50 could be amended so the second paragraph reads, "We are all affected by ICTs on a daily basis and we increasingly utilize ICTs to exercise our fundamental human rights. Those rights should be protected unequivocally, both online as they are offline."

ADDITIONAL GENERAL COMMENTS (Including some not related to specific paragraphs)

- The overall document should affirm a global commitment to preserve the Internet as a free and open eco-system and commit to its core values as well as to its architectural principles (neither of which should be altered or tampered with).
- It is important that laws aimed at retaliation for cybercrime and cyber attacks not clash with individual freedoms and human rights.
- Governments, as well as consumers and suppliers, play a critical role in improving the security of online products and services. The statement does not generally provide sufficient focus on the role of governments, in ensuring a free, open, and secure cyberspace. Instead, at times it pushes responsibilities to non-state actors, hackers, and to some extent, the corporate sector. It is also our experience that governments frequently use national security to justify a number of detrimental practices, from surveillance to politically-motivated network disruptions or shutdowns, and weakened security
- The statement should indicate the importance of governments refraining from acting to undermine the security of communications technology. Governments should never undermine encryption standards or mandate lesser encryption protocols to facilitate surveillance capabilities. These “back doors” put all users at risk and make it easier for criminals and other bad actors to gain access to sensitive user data.
- Section on International Peace & Security is weak and appears to condone destructive state behaviour in cyberspace.
- Promoting international recognition of a sanctuary status for cyberspace that precludes damaging offensive action should figure as an option.
- Nowhere it is mentioned that the internet is a public good, that should be managed in the public interest. There should be a strong denouncement of the production and spread of malware, vulnerabilities, as well as the trade in zerodays as well as the spread, trade and production of other cyber arms
- We note that there is a consistent characterization of the internet as a space for economic growth, but not as a public good. We believe the internet is not only an economic opportunity, but a public good.
- No mention of child online protection, which is inconsistent with Internet Governance agenda or recent fora
- Since the civil society pre-event is a new addition to the GCCS process, it is not possible at this time for us to endorse a statement that proclaims it either useful or successful. Though we applaud the special effort that has been paid to civil society participation in GCCS 2015, we are not ready to say that it should happen in exactly this manner again at the next GCSS without properly evaluating its value after the conference has commenced.
- Comment on GFCE
 - We will provide additional feedback on the Global Forum on Cyber Expertise (GFCE) once details of the organization are revealed. We would like to see further information regarding the GFCE and be assured that any Forum includes adequate representation of civil society from all regions of the world. It is concerning that the Global Forum on Cyber Expertise (GFCE) will only focus to develop the capacity of state actors and private sector. It is unclear how this will contribute and achieve the multi-stakeholder approach the conference wishes to promote as highlighted in other paragraphs and particularly paragraphs 42 and 43.

- GFCE may have more of a focus on security than GCCS, NETmundial, IGF, and other spaces, but it is not clear that there is a need for this. We are also concerned by the increased burden on stakeholders from developing countries to engage in all spaces annually.
- Internet Governance and Multistakeholder
 - Please don't separate the Internet Governance Section from the Multistakeholder model. They should somehow remain close to each other. Status and relationship to other subjects of the two segments related to Internet governance and Multistakeholder approach is not clear - - as currently presented and ordered in the document. Specifically, page 2 points 12 & 13 for "Internet Governance" are listed under a heading for "Economic Growth and Social Development"; page 6 points 42 & 43 for "Multistakeholder" are listed under heading for "Freedom and Privacy." Core question to drafters might be why Internet governance and Multistakeholder material is not a separate section that relates to the entire realm, and cybersecurity more explicitly
- need to define clearly concepts such as cyber security, cyber crime, not to conflate different problems with same concept, or not to define too broad, so may regard legitimate or contested activities as threat or crime.
 - Overall, the statement should begin with a clear definition of the problem sought to be addressed. The statement should also emphasize the need to transparently establish goals for cybersecurity, to protect user's human rights and avoid any overheated rhetoric ripe for abuse or fraught with vague and overbroad application.
 - Rather than "Fight cybercrime", which is not well defined and has the tendency to be invoked with limited scope for what constitutes crime online (eg does not tend to include gender-based violence online), we suggest replacing this term with "fight against human rights and internet rights" violations.
 - For the entire point and sub-points, we urge the Chair to keep in mind the principles of Necessary and Proportionate when it comes to intelligence gathering against citizens. Specifically under (d), "harmful" should be defined and not left to interpretation.
 - There are several cases where the use of "public and private" seems to assume that civil society and government together represent the "public" stakeholder position. It is clearer and more consistent to always use governments, private sector and civil society explicitly and separately. Additionally, there are inconsistencies in the terminology used such as "users", "consumers", "people", and sometimes "NGOs". These terms should be collapsed under "civil society".
- In para 17 - the document states: " It shows that the multi-stakeholder approach works." Actually, Internet security has degraded since 2005, when it was identified as one of three priority areas by the Working Group on Internet Governance. The current multi-stakeholder approach has not in fact addressed the issue satisfactorily, for a number of reasons including a failure to recognize and deal with externalities arising from lack of security.