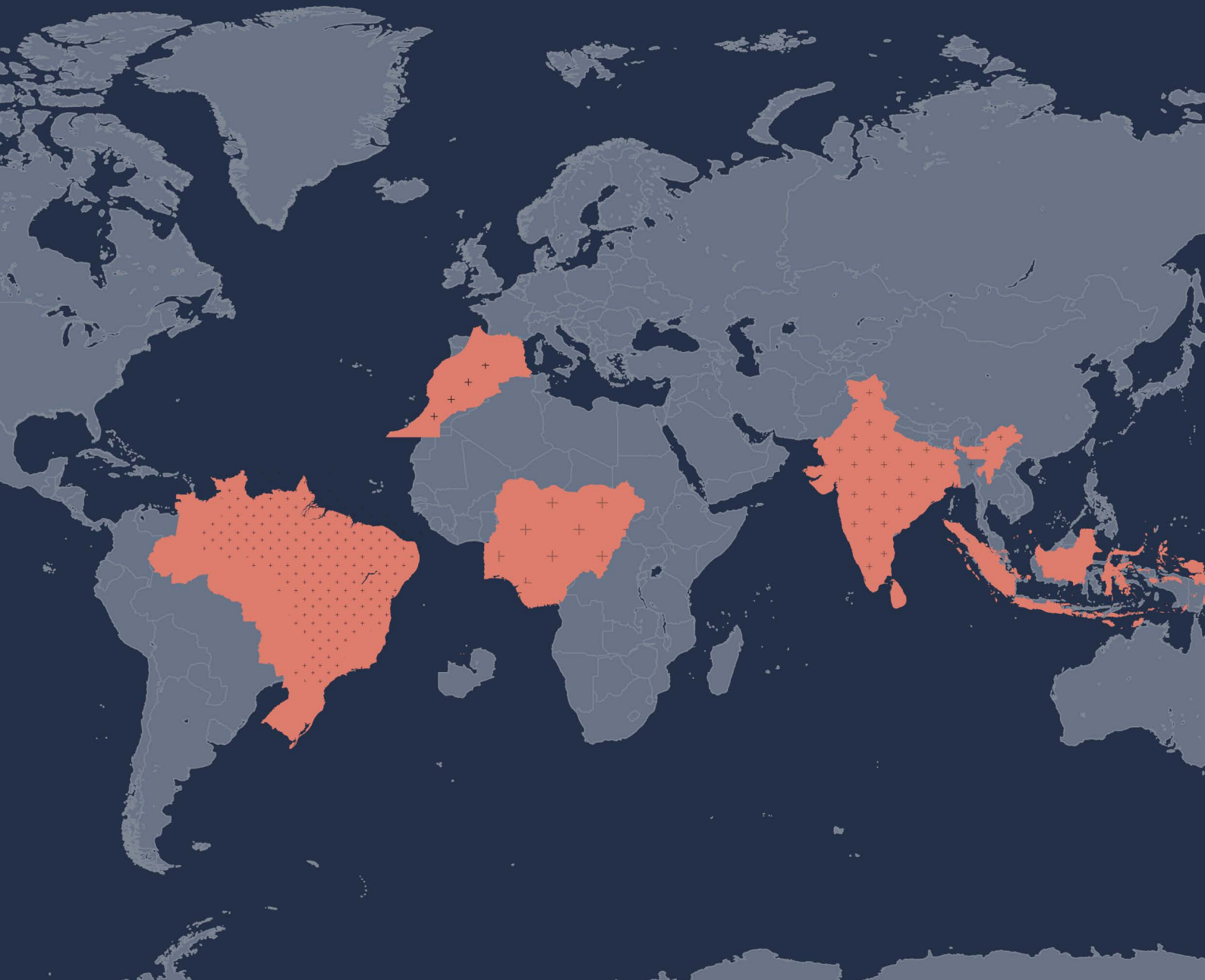


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Globalising Platform Regulation

Executive Summary

The Impact of Online Platform Regulations from the European Union, the United Kingdom and Australia on Platform Regulation in Global Majority countries



Overview

This report examines how recent Online Platform Regulations introduced in the European Union, the United Kingdom, and Australia are shaping regulatory approaches to online platforms in the Global Majority. Focusing on six diverse case studies – Brazil, India, Indonesia, Morocco, Nigeria, and Sri Lanka – we explore how the Global North platform regulation frameworks are influencing emerging regulatory models across varied geopolitical, cultural, and legal contexts.

For each regulatory framework, we explore the approach to the scope of regulated entities, platform liability, additional duties of online platforms, regulatory mechanisms and considerations of human rights. Our analysis is grounded in international human rights law and draws on a wide range of evidence to assess both direct and indirect impacts of Global North regulation. We identify patterns of both convergence and divergence, seeking to highlight the means and strategies through which Global Majority countries adapt and localise external regulatory trends.

The report concludes with targeted recommendations for policymakers in the Global Majority, emphasising how international frameworks and global best practices can be critically adapted to local realities. In doing so, we aim to support the development of platform governance models that are context-sensitive, effective and rights-respecting.

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Summary

Influence of the Global North

The regulatory choices in the EU's Digital Services Act (DSA), the UK's Online Safety Act (UK-OSA), and Australia's Online Safety Act (A-OSA) are influencing how Brazil, India, Indonesia, Nigeria, Sri Lanka, and Morocco are considering regulating online platforms.

Much like the GDPR's "Brussels Effect," the DSA in particular is setting a global precedent for transparency, accountability, and risk-based regulation.

Areas of Convergence

Systemic risk-based approaches: Several Global Majority countries are adopting duties of care, risk assessments, and transparency obligations inspired by the DSA, UK-OSA, or A-OSA frameworks.

Child safety: The jurisdictions analysed in Asia and Africa show strong alignment with the UK and Australian focus on age assurance and child protection.

Transparency & accountability: Requirements for clear terms of service, reporting, and researcher data access tend to mirror DSA provisions, expanding the ability of researchers and civil society actors to pursue evidence-based accountability from platforms.

Areas of Divergence

Regulatory independence: Unlike in the Global North, many Global Majority regulations face limitations in institutional settings. In many cases, regulators in charge of overseeing the frameworks can be closely tied to governments, creating risks of censorship and political misuse.

Human rights safeguards: Stronger protections for freedom of expression and privacy found in Global North laws are often absent or diluted in Global Majority frameworks. This creates opportunities to leverage the UN Guiding Principles on Business and Human Rights (UNGPs), oriented by the work of the OHCHR B-Tech Project, and best practices for shaping platform governance in the UNESCO's Guidelines for the Governance of Digital Platforms.

The role of encryption: While the EU exempts encrypted services under the DSA, the UK model threatens end-to-end encryption, and some Global Majority frameworks are leaning toward the UK's approach.

Country-specific Developments

Brazil: Following a landmark Supreme Court ruling, Brazil is reshaping its intermediary liability framework with explicit reference to the EU-DSA, expanding platform obligations while emphasising human rights protections.

India: The forthcoming Digital India Act is expected to impose systemic risk assessments and enhanced transparency requirements, though concerns remain about government overreach and weakened encryption.

Indonesia: Recent regulations (GR17/2025) focus heavily on child protection, closely echoing UK-OSA and A-OSA approaches while maintaining state-led enforcement in other areas.

Morocco: The planned regulatory framework explicitly draws inspiration from the EU-DSA, emphasizing transparency and child safety while raising concerns about potential content monitoring requirements.

Nigeria: The proposed Online Harms Protection Bill represents a shift from earlier punitive approaches toward risk-based, transparency-focused regulation influenced by the EU-DSA and UK-OSA.

Sri Lanka: Despite drawing inspiration from the UK-OSA, the Online Safety Act strips away crucial safeguards, creating a framework criticized as authoritarian and disproportionate to freedom of expression.

Risks of Transplantation

- Directly copying Global North frameworks into weaker rule-of-law environments may enable repression.
- Age assurance measures may harm privacy and disproportionately exclude vulnerable groups.
- Overly broad takedown obligations can incentivise platforms to censor legitimate speech.

Recommendations

1

Anchor platform regulation in human rights

2

Align with global norms and frameworks

3

Contextualize regulatory approaches

4

Establish an enabling regulatory ecosystem

5

Create independent and well-resourced regulators

6

Require transparency from online platforms

7

Adopt inclusive, multi-stakeholder processes

8

Carefully calibrate duty of care frameworks

9

Enhance the resilience of the information ecosystem

10

Foster transnational dialogue and Global Majority leadership

