

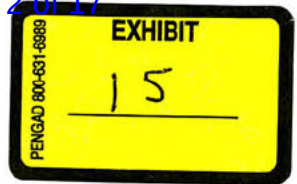
## **AMENDED Exhibit 365**

# **PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation



[Product Policy Research] Evaluation of [Cosmetic Surgery Filters]

## Policy Development Details

**Policy Research POC:** [REDACTED]

**Internal Research Expert:** Hitomi Hayashi-Branson, [REDACTED], Jennifer Guadagno

**Policy Platform:** PPF

### Dates:

- Head Up: September 24, 2019
- Head Start (Email): September 24, 2019
- Working Group Dates: October 2, 2019
- Policy Recommendation Date: November 19, 2019

## Policy Issue [Completed by Policy Team Proposing Issue]

**Main policy area:** Spark AR Product Policy

**Additional policy areas that may intersect:** Regulated Goods:

- Promotes the use or depicts the sale of certain cosmetic procedures such as those involving body enhancement:
  - Mentions or depicts the cosmetic procedure, and
  - Promotes, encourages, coordinates, or provides instructions for the procedure, or
  - Explicitly mentions the procedure is for sale, or
  - Asks the audience to purchase the procedure, or
  - Lists the price of the procedure, or
  - Gives away the procedure for free

## Policy Issue

Should we allow augmented reality (AR) effects that promote beauty standards only attainable through plastic surgery? We're seeing a rise in popularity of beauty effects -- both in creation and in use -- which has reinvigorated the conversation on the stance that Facebook and Instagram should take on how those filters relate to body image, mental health, and wellbeing. This is especially sensitive for its potential impact on younger users, who are the biggest demographic using our Spark effects.

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Status Quo: For effects in the 'Selfies' category, we reject effects that drastically lighten skin tone for cosmetic purposes, especially if the effect makes the user appear to be a different race.

Goal: Scope out and align on a policy proposal for third party beauty effects in Spark AR to escalate to leadership of stakeholder teams and then escalate to executives (likely Adam Moserri and Margaret Stewart).

### Guiding Questions [All teams]

#### **Questions to guide Working Groups [Completed by Policy Team]**

- How do we break out the various types of categories within beauty effects?
- How do we differentiate "fantastical" effects from beauty effects and how do we develop the ops guidelines to explain that differentiation?
- How do beauty effects -- especially effects that give you the illusion of plastic surgery -- affect mental wellbeing and body image?
- How do beauty effects affect younger users in particular? How does it affect their mental development, body image, confidence levels, etc.
- What have the effects been so far of AR filters on users? I.e., snapchat dysmorphia

#### **Additional Questions from Research Teams [Completed by UXR and PPR]**

- What is the rationale behind allowing the cosmetic effect on our platforms? How can we justify this effect has less impacts than plastic surgery effects on promoting unhealthy beauty standards?

### Key Research Issues [Synthesized by Internal Research Expert]

PPR partnered with Internal experts on Instagram Well-Being research to synthesize internal and external research across the following areas: Public health, medicine, and psychology to surface the following tradeoffs associated with this policy issue are as follows:

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- **The increasing use of face filters on social media leads to unrealistic beauty standards, mental health issues, and has been postulated to be related to a rise in plastic surgery, a phenomenon often referred to as 'Snapchat Dysmorphia'** (CNN health, 2018; [ HYPERLINK "https://www.sciencedirect.com/science/article/pii/S174014451400148X" \l "!" \h ], 2015; The Royal Society for Public Health, 2018; The Guardian, 2018).
- **Facebook and Instagram use is associated with body image issues and anxiety among users and particularly among women and teenage girls.** Airbrushed and unrealistic images of women online can lead to eating disorders and body dysmorphia (a condition [ HYPERLINK "https://adaa.org/understanding-anxiety/related-illnesses/other-related-conditions/body-dysmorphic-disorder-bdd" \h ]). This is more prevalent among women and even more so prevalent among teenage and adolescent girls ([ HYPERLINK "https://www.sciencedirect.com/science/article/pii/S174014451400148X" \l "!" \h ], 2015; [ HYPERLINK "https://www.sciencedirect.com/science/article/pii/S174014451400148X" \l "bib0285" \h ]). Men are, however, also found to be affected by photo-based activity on social media (Lonergan et al, 2018).
- **There is no research-based agreement on the effectiveness of warning signs on highly filtered photos.**
  - While some experts and users recommend and support warning signs (Wang et al., 2019; The Royal Society for Public Health, 2018), there is a growing body of evidence that warning labels (or disclaimer labels) on digitally altered photos do not necessarily reduce the risk of exacerbating body dissatisfaction and could rather emphasize "an ideal version of beauty" ([ HYPERLINK "https://www.sciencedirect.com/science/article/pii/S1740144519301937?via%3Di hub" \h ]).

## Summary of Current Research

**External**



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**Social media causes social comparison and poor body image (especially among teen girls and women, but men are also found to be affected).**

- [ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S174014451400148X>" \h ] ([ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S174014451400148X>" \l "!" \h ], 2015) - In this study on the impact of using Facebook on mood and body image (n= 112 female participants), researchers found that women had a more [ HYPERLINK "<https://www.sciencedirect.com/topics/psychology/negative-mood>" \h ] after brief exposure to Facebook, and for women who scored high in appearance comparison, Facebook usage led to higher dissatisfaction with current facial characteristics.
- [ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S1740144518301414>" \h ] (Lonergan et al, 2018) - Nevertheless, according to this study on the samples in Australia, men and women experienced similar levels of body dissatisfaction when associating with photo-based social media activities, with male adolescents in particular, who are more likely to manipulate photos, possibly due to their focus on appearance and peer relations as well as their knowledge and skill in using photo-editing application.
- [ HYPERLINK "<https://journals.sagepub.com/doi/abs/10.1177/1461444817694499>" \h ] [ HYPERLINK "<https://journals.sagepub.com/doi/abs/10.1177/1461444817694499>" \h ] ([ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S174014451400148X>" \l "!" \h ] et. al., 2017) - This study on Instagram use among teens in the US and Australia found that greater overall Instagram use was associated with greater self-objectification. This relationship was mediated by internalization of these images and by appearance comparisons to celebrities. A study on the impact of viewing edited photos on Instagram found that

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the more that someone (and particularly young women) perceived an image to be digitally edited, the less likely they were to internalize the image and what it portrays (e.g., the ideal size of a woman) (Vendemia & DeAndrea, 2018).

- [ HYPERLINK

"<https://link.springer.com/article/10.1007/s12144-019-00282-1>" \h ] (Walker et. al., 2019) - This study found that a user's

desire for cosmetic surgery is related to their time spent on social media, the number of accounts they follow, and their satisfaction with their appearance.

Related research on the relationship between sociocultural influences (from peers, parents, and the media) and beauty ideals hypothesizes that 1) internalisation of appearance ideals and 2) appearance comparison mediate this relationship.

"Internalisation occurs when a person has accepted societies' beauty ideals and engages in behaviours to achieve that ideal. Appearance comparison relates to people evaluating and directly comparing themselves to others based on how they look." The (perceived and/or real) inability to reach these ideals can create problems with body image such as body dissatisfaction.

- For related research on the impact of social media on body image, refer to: [ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S174014451400148X>" \l "bib0270" \h ]; [ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S174014451400148X>" \l "bib0270" \h ] [ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S174014451400148X>" \l "bib0275" \h ] [ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S174014451400148X>" \l "bib0270" \h ]; [ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S174014451400148X>" \l "bib0285" \h ]; [ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S174014451400148X>" \l "bib0290" \h ]; [ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S174014451400148X>" \l "bib0180" \h ]; [ HYPERLINK "<https://www.sciencedirect.com/science/article/pii/S174014451400148X>" \l "bib0060" \h ].

**Users love beauty filters but filters can exacerbate body image issues by blurring the line between what is and is not real.**



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- [ HYPERLINK "<https://www.cnn.com/2018/08/10/health/snapchat-dysmorphia-cosmetic-surgery-social-media-trend-trnd/index.html>" \h ](CNN health, 2018). According to this article, "social media apps, such as Snapchat and Facetune, are providing a new reality of beauty for today's society...these apps allow one to alter his or her appearance in an instant and conform to an unrealistic and often unattainable standard of beauty." This causes a gap between perception and reality that can have serious psychological consequences on users.
- [ HYPERLINK "<https://www.nbcnews.com/think/opinion/your-favorite-selfie-filter-could-be-contributing-mental-health-crisis-ncna837376>" \h ] (NBC news, 2018) - Face filters can range from airbrushing acne and teeth whitening to changing the complete architecture of your face. Snapchat and Instagram have been most highly criticized for its filters. "Snapchat[ HYPERLINK "[http://www.huffingtonpost.ca/2016/05/17/snapchat-whitewashing-controversy\\_n\\_10011062.html](http://www.huffingtonpost.ca/2016/05/17/snapchat-whitewashing-controversy_n_10011062.html)" \h ] [ HYPERLINK "[http://www.huffingtonpost.ca/2016/05/17/snapchat-whitewashing-controversy\\_n\\_10011062.html](http://www.huffingtonpost.ca/2016/05/17/snapchat-whitewashing-controversy_n_10011062.html)" \h ] people of color with filters that automatically lighten skin, thin noses and make eyes rounder...Instagram [has filters that] adjust lightness and darkness like a photo editor, allowing (or encouraging) people to artificially lighten or darken their skin and eliminate perceived flaws". With the rise of these filters, images that others are comparing themselves to are increasingly not a reflection of reality and can lead to real mental health consequences such as low self-esteem and even body dysmorphia.

**Filtering leads to unrealistic beauty standards, mental health issues, and a rise in plastic surgery**

- [ HYPERLINK "[https://onlinelibrary.wiley.com/doi/epdf/10.1002/eat.22449?referrer\\_access\\_token=iMN98Yp8wpwKiIV1yLr-CU4keas67K9QMdWULTWMO8OZKbuBUSfLkRIBg7SGFGdR5tkTguN26mbwBDavW3P8iCzgqUNnanIT1xR7J5CjBop3zNHRrSymCD1pa9iBGNmikVYxoiMBUUAaCjHRPFb9zw%3D%3D](https://onlinelibrary.wiley.com/doi/epdf/10.1002/eat.22449?referrer_access_token=iMN98Yp8wpwKiIV1yLr-CU4keas67K9QMdWULTWMO8OZKbuBUSfLkRIBg7SGFGdR5tkTguN26mbwBDavW3P8iCzgqUNnanIT1xR7J5CjBop3zNHRrSymCD1pa9iBGNmikVYxoiMBUUAaCjHRPFb9zw%3D%3D)" \h ] [ HYPERLINK "[https://onlinelibrary.wiley.com/doi/epdf/10.1002/eat.22449?referrer\\_access\\_token=iMN98Yp8wpwKiIV1yLr-CU4keas67K9QMdWULTWMO8OZKbuBUSfLkRIBg7SGFGdR5tkTguN26mbwBDavW3P8iCzgqUNnanIT1xR7J5CjBop3zNHRrSymCD1pa9iBGNmikVYxoiMBUUAaCjHRPFb9zw%3D%3D](https://onlinelibrary.wiley.com/doi/epdf/10.1002/eat.22449?referrer_access_token=iMN98Yp8wpwKiIV1yLr-CU4keas67K9QMdWULTWMO8OZKbuBUSfLkRIBg7SGFGdR5tkTguN26mbwBDavW3P8iCzgqUNnanIT1xR7J5CjBop3zNHRrSymCD1pa9iBGNmikVYxoiMBUUAaCjHRPFb9zw%3D%3D)" 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w%3D%3D" \h ] (Mclean, 2015) - According to this study on social media use among

101 7th grade girls in Australia, girls who shared photos of themselves online reported higher levels of both body dissatisfaction and an overvaluation of "the thin ideal." In addition to sharing and consuring behavior, how much girls edited their photos was significantly related to poor body satisfaction.

- [ HYPERLINK "https://www.rsph.org.uk/uploads/assets/uploaded/d125b27c-0b62-41c5-a2c0155a8887cd01.pdf" \h ] (The Royal Society for Public Health, 2018) - This report summarized results from a survey of 1,500 people (aged 14 to 24) that aimed to understand the impact of social media (including YouTube, Snapchat, Facebook, Pinterest and Twitter) on mental health. Use across all platforms was associated with users' anxiety and depression. Facebook and Instagram scored the lowest on body image and anxiety. Unrealistic beauty standards and pressure have led to speculation that social media is behind a rise in younger generations opting to have cosmetic surgery to look better in photos (The Guardian, 2018). A suggested approach to this is to have social media platforms highlight when photos of people have been digitally manipulated. In this study, more than two thirds (68%) of young people support social media highlighting when a photo has been manipulated.
- [ HYPERLINK "https://www.theguardian.com/technology/2018/aug/08/snapchat-surgery-doctors-report-rise-in-patient-requests-to-look-filtered" \h ] (The Guardian, 2018) - This article on the relationship between social media filters and plastic surgery report that "[plastic surgery] patients are coming to them with selfies of themselves edited using the filters on[ HYPERLINK "https://www.theguardian.com/technology/snapchat" \h ] [ HYPERLINK "https://www.theguardian.com/technology/snapchat" \h ] or Instagram and asking to look more like the retouched photo". Airbrushed and unrealistic



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images of women in magazines and online can lead to eating disorders and body dysmorphia (a condition[ [HYPERLINK "https://adaa.org/understanding-anxiety/related-illnesses/other-related-conditions/body-dysmorphic-disorder-bdd"](https://adaa.org/understanding-anxiety/related-illnesses/other-related-conditions/body-dysmorphic-disorder-bdd) \h ]) particularly among women and teenage girls.

- [ [HYPERLINK "https://jamanetwork.com/journals/jamafacialplasticsurgery/article-abstract/2688763"](https://jamanetwork.com/journals/jamafacialplasticsurgery/article-abstract/2688763) \h ] ([ [HYPERLINK "https://jamanetwork.com/searchresults?author=Susruthi+Rajanal&q=Susruthi+Rajanal"](https://jamanetwork.com/searchresults?author=Susruthi+Rajanal&q=Susruthi+Rajanal) \h ], 2018) - This report claims that filters can have particularly disastrous impact on self-esteem and can even trigger body dysmorphic disorder. Filters on social media apps, like Snapchat, provide users with unrealistic beauty standards. Doctors have identified a trend of “people bringing in their own selfies, usually edited with a smartphone application, and asking to look more like their photos...this is now what is called “Snapchat dysmorphia”. Also see:[ [HYPERLINK "https://www.washingtonpost.com/news/morning-mix/wp/2018/08/06/patients-are-desperate-to-resemble-their-doctored-selfies-plastic-surgeons-alarmed-by-snapchat-dysmorphia/"](https://www.washingtonpost.com/news/morning-mix/wp/2018/08/06/patients-are-desperate-to-resemble-their-doctored-selfies-plastic-surgeons-alarmed-by-snapchat-dysmorphia/) \h ] [ [HYPERLINK "https://www.washingtonpost.com/news/morning-mix/wp/2018/08/06/patients-are-desperate-to-resemble-their-doctored-selfies-plastic-surgeons-alarmed-by-snapchat-dysmorphia/"](https://www.washingtonpost.com/news/morning-mix/wp/2018/08/06/patients-are-desperate-to-resemble-their-doctored-selfies-plastic-surgeons-alarmed-by-snapchat-dysmorphia/) \h ] (Washington post, 2018).

**The association between beauty expectations and social media use, the use of photo filter in particular, is observed cross-culturally. However, the particularly high focus on physical appearance and the normalization of plastic surgery in some Asian countries may place these populations at higher risk.**

- Body dissatisfaction and eating disorders are now global health concerns and studies indicate they are on the rise in Asia (Pike & Dunne, 2015). Studies indicate that young women in Korea and China report higher levels of body dissatisfaction and disordered eating behaviors than young women in the United States (Pike & Dunne, 2015; Jung & Forbes, 2006). Data shows that as body comparison increases body satisfaction decreases, and that this occurs cross-culturally.[ [HYPERLINK "https://our.internmc.facebook.com/intern/research/p/2baxhssaem/"](https://our.internmc.facebook.com/intern/research/p/2baxhssaem/) \h ]
- There is currently limited research on the direct impact of filtered images on non-western countries, and non-female populations. However, the acute focus on beauty and disproportionate idealization of unrealistic beauty standards in some countries, such as in Korea and China, may lead to more exposure to and a larger negative impact of filtered image on users’ mental health. An article on the impact of

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filters on body image ([ HYPERLINK "<https://www.scmp.com/lifestyle/fashion-beauty/article/3014543/how-snapchat-dysmorphia-drives-teens-plastic-surgery-copy>" \h ] ) cites an alarming rise in plastic surgery among Chinese people under the age of 28. This may be related to beauty expectations driven by social media use and specifically the use of filters. According to this article, this relationship (between social media use and plastic surgery) is further exacerbated by the normalization of and ease of access to plastic surgery, as well as the glorification, and resulting de-stigmatization, of plastic surgery in Asian countries like Korea.

- Additionally, the use of euro-centric filters may have a disproportionate negative impact on people of non-european descent. Companies, like Snapchat, along with other apps from Asia, have been accused of offering filters that “white-wash” images that “transform selfies into lighter, slimmer, and wider-eyed versions of users” ([ HYPERLINK "[https://www.huffingtonpost.ca/2016/05/17/snapchat-whitewashing-controversy\\_n\\_10011062.html](https://www.huffingtonpost.ca/2016/05/17/snapchat-whitewashing-controversy_n_10011062.html)" \h ]).

**Despite the negative impact of filters on mental health, user demand for filters is high. Given the high use of filters across Facebook and Instagram, this presents an opportunity to drive new norms and standards around filtered photos.** There are a number of suggested approach to combat the negative impact of filters (i.e., unrealistic expectations of beauty) including:

- To have social media platforms highlight when photos of people have been digitally manipulated. In a study of 1,500 people (aged 14 to 24), more than two thirds (68%) of young people support social media highlighting when a photo has been manipulated (The Royal Society for Public Health, 2018).
  - **There are, however, no clear scholarly agreement that warning labels (or disclaimer labels) on digitally altered photos do have (or not) reduce the risk of Snapchat dysmorphia.**
  - [ HYPERLINK "<https://reader.elsevier.com/reader/sd/pii/S1740144519301937?token=19B8A7905CD06D0FFF043B0C2BB99C573CA3103688527C7233A228B99F432C13C28E9775848790D4B3EBD970E75E8A47>" \h ] (Tiggemann, Brown, and Anderberg, 2019) - Digital alteration labels can rather emphasize to viewers that the image they are seeing represents an ideal version of beauty - “a version they are unlikely to ever meet.”
- Another common effort centered on decreasing the pressure to be perfect is campaigns where users post their unfiltered photos (e.g., #nofilter on Instagram) (Self, 2016).



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**INTERNAL**

**FOR REFERENCE:** [ HYPERLINK

"https://fb.workplace.com/groups/camerafyi/permalink/1544328042246440/" \h ]

- A few years old now, but a good overview of a majority of the beauty apps and the type of beautification they include.

**Although people find value in beauty filters they still want to look like themselves, they want the filters to look 'natural'.**

[ HYPERLINK "https://fb.workplace.com/notes[REDACTED]/help-me-look-better-filters-insights-from-influencers-and-beautycon-la/246052162790566/" \h ] & [ HYPERLINK

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- One size doesn't fit all: filters that help people look better should take the person who is using it into consideration by matching the effect to their face shape, skin tone, the environmental lighting, and if they are wearing or not wearing makeup while helping them look better naturally.
- Filters that help people look better need to do so in a way that is natural looking. The influencers we spoke with (and have heard the same sentiment in previous research), is that they do not want filters that help them look better in ways that are obvious.

**The altering of selfies appears to be connected with negative impacts on both the person posting it, and those viewing it in terms of mental health, body dissatisfaction, and eating disorder behaviors.**

[ HYPERLINK "https://our.internmc.facebook.com/intern/research/p/2baxhssaem/" \h ]

- Technology offers new ways to modify appearances. And while this may foster social acceptance among peers, this exposes people to unattainable standards of attractiveness. According to this review: "viewing edited selfies of "normal" people exposes us to standards of attractiveness we cannot achieve, but now believe is attainable by our peers". This may ultimately alienate users and make them feel like outsiders.
- Even beyond mental health concerns, data indicates that editing selfies may have a paradoxical effect with regards to social connection. Rather than increasing



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acceptance, studies indicate that women are actually more critical of female peers they believe have digitally altered their selfies (Vendemia & DeAndrea, 2018).

- Findings also indicate that how individuals interact with social media (e.g., engaging in photo manipulation) is more relevant to body dissatisfaction and eating disorder behavior than overall engagement in social media activities
- **Our teams have an important decision to make around where to draw the line on what types of filters we will develop/allow.** For example, in the past the IG team made the decision to not pursue facial filters that produce images only achievable by plastic surgery (i.e., face deformation).

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**Attachment Count:** 0

**PRODVOL:** META3047MDL\_VOL020

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**Create Date:** 11/30/2020 12:00 AM

**Last Modified Date:** 11/30/2020 12:00 AM

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**TRACK CHANGES:** N

**COMMENTS:** N

**HASHIDDENATA:** N

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