

AMENDED Exhibit 620

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

TikTok-Furlong

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4/11/2025 - MOP

Filters & Effects: advice from EU/US GR/PR

Background

In Europe and US, platforms (including TikTok) are under scrutiny from the media and policy makers about the type of filters and effects that lead to a negative body image. It is important to understand this issue and to ensure the filters and effects we offer our community do not perpetuate a narrow and unattainable standard of beauty. There is also significant pressure to ensure filters and effects are labelled so that users know when images have been modified.

This note is intended to give Product greater insight on how the issue of body image is discussed in the EU and to offer some suggestions on how we respond to this in the design of our filters and effects.

What is self image?

Self-image is how a person perceives themselves. It is the accumulation of self-impressions built up over time. Self-image can be very positive, giving a person confidence in their thoughts and actions, or negative, making a person doubt of their capabilities and ideas. Self image is closely connected to self-esteem.

What is body image?

Body image is a category of self image that encapsulates the way a person perceives and evaluates their physical appearance.

Who is most likely to experience negative body image?

Body image and appearance concerns can be experienced by anybody, across all genders, ages, ethnicities, disabilities, appearance conditions and sexualities. However, it is experienced disproportionately by some groups. For example:

- * Gender: women and girls are disproportionately affected by body image. Transgender individuals, or people who identify outside the gender binary, are also more likely to be affected.
- * Adolescents: body image and appearance concerns are particularly prevalent during adolescence which is a critical moment of intense identity exploration and development. The messages teens receive about how they should (and shouldn't) look become integrated into their self identity and negative feedback can be hard to move past.

Commented [1]: @Alexandra Evans- I also wanted to share two additional points. One is about ensuring diversity within the review process - is the product council to review body made up of a diverse range of people he will be able to look at the risks from different perspectives. If not, we may miss things. I've been asked to share thoughts on new product features that are in development from a D&I perspective as a member of Black and Bytepride. This often feels ad hoc and I think the Product team would benefit from a standardised group that it could go to on D&I issues (probably global). The second is a parallel issue around the testing of features to make sure that they work accurately for different skin tones. There seems (quite rightly) to be a desire to test new features on employees with darker skin tones to make sure they work, but no process to do it in a way structured way to make sure Product has the right mix of people who can be made aware of often confidential info. There was a recent issue with one of the consent forms not being having not been approved by EU legal, etc.

Julie de Baillencourt : [THUMBSUP] 2021-04-12 00:47:56

Commented [2]: May I also suggest athletes? <https://www.nationaleatingdisorders.org/statistics-research-eating-disorders> - In a study of Division 1 NCAA athletes, over one-third of female athletes reported attitudes and symptoms placing them at risk for anorexia nervosa. - FYI on some additional information for US: https://www.nimh.nih.gov/health/statistics/eating-disorders.shtml#part_155058

Lisa Hayes : [THUMBSUP] 2021-12-23 23:37:19

Commented [3]: Good shout. I'll add.

- * Sexual orientation: to use a very broad umbrella term, sexual minority groups tend to experience poorer body image than heterosexual groups.
- * Ethnicity: certain ethnic groups and people of colour experience additional appearance pressures, due to racialised appearance standards.
- * Disability/visible difference: some people who experience conditions that alter their appearance are more likely to experience body image concerns, but not all.
- * Weight: people who live in bodies that are larger or have higher weight are also more likely to experience poorer body image.
- * Athletes: athletes are constantly under pressure to fit their sport's stereotypical athletic body. These athletic stereotypes can lead to the risk of body image dissatisfaction among athletes who are struggling to meet the criteria for the ideal body.

It is likely that being in more than one of these groups compounds negative body image and appearance concerns further. For example, women of colour or sexual minority women of colour would potentially experience intersecting concerns at a higher level.

What impact can negative self image have?

- * Mental health and wellbeing: body dissatisfaction is associated with increased risk of depression, anxiety and eating disorders. There are also some links to suicidal ideation.
- * Risk behaviours: those with a negative body image are more likely to participate in risk taking including smoking, drinking or drug use,
- * Physical health: poorer body image is related to not partaking in healthy behaviours and is also associated with gaining weight which can lead people to avoid being in contact with the healthcare system.
- * Opportunity cost: adolescent girls who experience poorer body image, or body image concerns, often opt out of life activity. For example, not putting their hand up in class or not joining in a club. There are also links to poorer academic performance and curtailed career aspirations.
- * Equality cost: the narrow range of bodies that are treated as beautiful, or even just acceptable, are inherently discriminatory and intersect with norms about age, race, disability and gender.

How are filters connected to negative self image for young people?

As discussed above, young people (especially girls) are at heightened risk of experiencing negative body image. Whilst the causes are multifaceted, the digital environment has created additional challenges for young people. Through photo editing tools and public approval systems through the form of 'likes', social media provides young people with the opportunity to hone their image, curating a version of themselves that they think will be acceptable in their digital world - typically highly idealised. While much of the editing

undertaken by young people is seemingly small scale, it reflects the fact that they do not believe that their true self is sufficient.

In addition to contemplating how they curate and present their own image online, use of filters by their favourite creators and influences means young people are constantly exposed to narrow and unrealistic representations of beauty. Lack of transparency about use of filters means they don't always understand that the images they see are unattainable - even for the influencer. The inability to meet narrow beauty norms can negatively impact young people's self image.

Filters that negatively impact self image for other high risk groups?

Examples of filters that negatively impact self image for other high risk groups include:

- * 'Fat' filters where users can pretend to be overweight for comedic value - depicting being overweight as a dystopian alternative reality.
- * 'Thin' filters which imply being thinner (often hyper thin) is aspirational.
- * 'Beautifying' filters that enhance lips, narrow chins and noses and slim cheeks etc which imply that changing these features is aspirational.
- * 'Black face' filters where users can try on and then put down different ethnicities in way that perpetuates racial stereotypes and is insensitive to the lived experience of ethnic minority groups. Filters and effects that extenuate or lean into a protected characteristic can be used to mock, abuse (or on the other side) fetishise that group which can be harmful.
- * 'Age' filters which imply wrinkles and other signs of aging are unattractive or even scary.

How can filters positively impact self image?

The absence or minimisation of beauty normative filters is meaningful in itself. Removing or labelling 'airbrush' filters or effects, means users are exposed to more transparent and realistic representations of beauty. However, filters can also have a positive impact on identity development especially for young people or those exploring new identities (for example their gender or sexual identity). Filters that are funny or quirky give users opportunities for self-expression in ways that are unrelated to beauty. Filters can also be a way of signalling and celebrating identity affiliations as a means of empowerment.

Why is this issue especially important for TikTok?

TikTok is a platform that celebrates diversity and authentic self-expression, offering filters and effects that perpetuate a narrow and unattainable beauty norm runs counter to our narrative and our values. Such filters and effects also have the potential to negatively impact the wellbeing of our community. We want to create an environment where our community feels comfortable, confident, and safe to be exactly who they are while expressing themselves freely.

Commented [4]: @Alexandra Evans LGTM! In terms of impact, filters and effects that extenuate or lean into a protected characteristic can be used to mock, abuse (or on the other side) fetishise that group which can be harmful. Adding a test to see how filters can be used to abuse other groups would be helpful. I know the helpful framework below focuses on neutrality but thought I'd flag this as well as less about self image and more about misuse which would also be a helpful test.

Alexandra Evans : [THUMBSUP] 2021-04-16 16:50:26

Commented [5]: @Alexandra Evans should we also list 'beautifying' filters that enhance lips/make chin and nose smaller/slim cheeks etc? Or has the ship sailed?

Alexandra Evans : [THUMBSUP] 2021-04-02 20:22:36

Jamie Favazza : [JIAYI] 2021-04-15 06:44:12

Aishwarya K : [JIAYI] 2021-04-27 13:06:27

Commented [6]: I think some of it would be covered in the diversity feature but still worth adding. I'd give the caveat as with thin filters that it's problematic when they suggest it's necessary/aspirational.

Suggestions when developing new filters and effects

EU GR/PR suggest filters and effects should be:

- * **Gender neutral** - for example makeup filters and effects should not be directed exclusively to women and should not be hypersexualised.
- * **Sexuality neutral** - for example filters and effects should not be given names that play into stereotypes of LGBTQ+ people.
- * **Body shape neutral** - for example filters and effects should not imply users need to present as thinner to be beautiful.
- * **Age neutral** - for example filters and effects should not imply that older faces or bodies are less beautiful or less valued.
- * **Ethnicity neutral** - for example filters and effects should not present typically caucasian features as an optimum beauty standard, allow users to co-opt ethnic identity traits or perpetuate racial stereotypes.
- * **Disability/ability neutral** - for example filters and effects should not mock or minimise physical and mental impairments.
- * Encourage **positive** exploration of self-identity.
- * Empower **celebratory** expressions of self-identity.
- * **Not fixate on beauty** - we should over index on filters and effects that are celebratory, funny quirky, creative, exploratory, fantasy-themed or playful.
- * **Labelled** so that viewers know when an video has been enhanced and know what filter or effect has been applied.
- * **Tested** so that we are confident that new filters and effects apply in a standardised way across the diversity of our community - for example, we are confident they work well on all skin tones and all body shapes and sizes.
- * **Reviewed** where Product is unsure if a proposed filter or effect is appropriate, it would be helpful to develop a standardised internal review solution that includes a diverse range of people who have undergone training and have the necessary clearance.

The standards should apply to all aspects of a filter or effects design including its name and the thumbnail image.

Norwegian Legislative Proposal on retouched advertisement

As part of the efforts against negative self images and unattainable beauty norms, the Norwegian Government presented a bill to the parliament this week, proposing to label advertisement that is retouched. Both images and videos are in scope, and alternations that are made both during filming (Snapchat filters are explicitly mentioned) and after require labelling. The requirement is on the individual advertiser or creator using the platform, and there are ambitions to put in place a specific, standardized label for the market.

Commented [7]: Not sure where to call this out, but we currently have a "beauty mode" – so considering the naming of filters and effects might be a good thing to note as well?

Commented [8]: Good call out. We're actually also asking Product to review the positioning of this mode (it's called Enhance in EU) so it aligns with EU expectations. Interested to hear your thoughts: <at type="HYPERLINK" href="https://bytedance.feishu.cn/docs/doccnp0SXe7m7GtJawknCv64fze" \h]

Jamie Favazza : [THUMBSUP] 2021-04-16 01:56:49

Commented [9]: I think this is great! Something we should certainly think about for the US, in my opinion, as well!

Commented [10]: @Na Li

李娜 : [APPLAUSE] 2021-10-15 21:01:32

Commented [11]: @Xiangmei Cheng

Commented [12]: @Alexandra EvansHi Alexandra, may I share this doc with Intelligence Creation team? They may use it for all hands training.

Commented [13]: Hey, Na Li. You're welcome to share it.

李娜 : [HEART] 2022-02-22 18:17:49

李娜 : [APPLAUSE] 2022-02-22 18:17:52

Commented [14]: How do we envision this label? I'm mindful of label fatigue.

Holly Song : [JIAYI] 2021-10-05 17:46:17

Commented [15]: We already label effects (accessed at the bottom of the 'create video' screen) but because this is accessed on the right hand side it's not labelled so this would bring it in line with the rest of the effects.

Jamie Favazza : [THUMBSUP] 2021-04-16 01:56:44

Commented [16]: Off topic but... More generally, I totally agree with you on labelling and it's an issue we've asked the behavioural scientist from Harvard to advise on in relation to dangerous challenges.

Lisa Hayes : [THUMBSUP] 2021-04-15 22:22:09

Jamie Favazza : [THUMBSUP] 2021-04-16 01:56:41

Commented [17]: Or body shapes and sizes (we just had an issue with this recently with a robot effect)

Alexandra Evans : [THUMBSUP] 2021-04-15 19:54:15

Commented [18]: Thanks, will add.

Commented [19]: In France, commercial influenceurs will be asked to be transparent about the modification of their morphology in their photos and videos, if this draft proposal is adopted, which is much likely to be the case:

https://www.assemblee-nationale.fr/dyn/16/textes/l16b1006_texte-adopte-commission

Full proposal [[HYPERLINK "https://www.regjeringen.no/no/aktuelt/retusjert-reklame-ma-merkjast/id2843545/"](https://www.regjeringen.no/no/aktuelt/retusjert-reklame-ma-merkjast/id2843545/) \h] (in Norwegian).

Examples of negative media/policy attention

- * [[HYPERLINK "https://publications.parliament.uk/pa/cm5801/cmselect/cmwomeq/274/27402.htm"](https://publications.parliament.uk/pa/cm5801/cmselect/cmwomeq/274/27402.htm) \h] (Apr 21)
- * [[HYPERLINK "https://www.technologyreview.com/2021/04/02/1021635/beauty-filters-young-girls-augmented-reality-social-media/"](https://www.technologyreview.com/2021/04/02/1021635/beauty-filters-young-girls-augmented-reality-social-media/) \h] (Apr 21)
- * [[HYPERLINK "https://www.bbc.co.uk/news/technology-56503546"](https://www.bbc.co.uk/news/technology-56503546) \h] (Mar 21)
- * [[HYPERLINK "https://www.voguebusiness.com/technology/the-ethics-and-future-of-flattering-ar-filters"](https://www.voguebusiness.com/technology/the-ethics-and-future-of-flattering-ar-filters) \h] (Mar 21)
- * [[HYPERLINK "https://www.forbes.com/sites/petersuciu/2021/02/24/social-media-can-increase-risk-of-eating-disorders-and-negative-body-image/?sh=17c49017e496"](https://www.forbes.com/sites/petersuciu/2021/02/24/social-media-can-increase-risk-of-eating-disorders-and-negative-body-image/?sh=17c49017e496) \h] (Feb 21)
- * [[HYPERLINK "https://www.telegraph.co.uk/news/2020/12/16/social-media-giants-accused-fueling-body-dysmorphia-filters/"](https://www.telegraph.co.uk/news/2020/12/16/social-media-giants-accused-fueling-body-dysmorphia-filters/) \h] (Dec 20)
- * [[HYPERLINK "https://www.telegraph.co.uk/news/2020/12/17/reality-bound-jarring-digital-filters-make-easy-appear-beautiful/"](https://www.telegraph.co.uk/news/2020/12/17/reality-bound-jarring-digital-filters-make-easy-appear-beautiful/) \h] (Dec 20)
- * [[HYPERLINK "https://hellogiggles.com/beauty/tiktok-timewarpscan-body-shaming/"](https://hellogiggles.com/beauty/tiktok-timewarpscan-body-shaming/) \h] (Nov 20)
- * [[HYPERLINK "https://www.womenshealthmag.com/beauty/a33264141/face-filters-mental-health-effect/"](https://www.womenshealthmag.com/beauty/a33264141/face-filters-mental-health-effect/) \h] (Aug 20)
- * [[HYPERLINK "https://www.thequint.com/neon/social-buzz/tik-tok-beauty-feature-extremely-problematic"](https://www.thequint.com/neon/social-buzz/tik-tok-beauty-feature-extremely-problematic) \h] (Jun 20)

Further reading

- * [[HYPERLINK "https://www.nimh.nih.gov/health/statistics/eating-disorders.shtml"](https://www.nimh.nih.gov/health/statistics/eating-disorders.shtml) \l "part_155058" \h]
- * [[HYPERLINK "https://www.nationaleatingdisorders.org/statistics-research-eating-disorders"](https://www.nationaleatingdisorders.org/statistics-research-eating-disorders) \h]

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