



Digital Democracy
Initiative

CASE STUDY:

AFRICAN LANGUAGES AND NATURAL LANGUAGE PROCESSING (NLP):

CHALLENGES AND
OPPORTUNITIES FOR
CIVIL SOCIETY



CIVICUS



Acknowledgments

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We would like to acknowledge and thank all the civil society actors, researchers, and practitioners who generously shared their time and insights through interviews and expert consultations for this research



Digital Democracy Initiative

The Digital Democracy Initiative (DDI) is a programme to safeguard inclusive democracy and human rights in the digital age. It focuses on supporting local civil society in the Global South, particularly in countries undergoing democratic regression and where civic space is under pressure.

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Of the 7,000 languages spoken worldwide, Africa is home to a third of them, making it the most linguistically diverse continent.¹ Despite this diversity, African languages are under-represented in Natural Language processing (NLP), a subfield of artificial intelligence and computational linguistics concerned with enabling computers to understand, generate, and manipulate human language.²

NLP techniques are fundamental to the digital tools and platforms we use daily. They are deployed to detect spam, predict what we are typing, moderate content we post online, recognise our speech and convert it into text or to perform an action, for example, with voice assistants. Large Language Models (LLMs) deploy NLP techniques, and they represent a significant advancement in the field. They are trained in large amounts of datasets and perform a wide range of tasks.³ They power Generative AI models and are a key component of the content moderation operations of social media platforms.

High quality datasets that are free from biases, inaccuracies, and errors are essential in the field of NLP, and large language datasets are necessary for the development of LLMs. These datasets are needed for the training of machine learning models, and when high quality data sets are scarce, there are wide implications for people and their human rights. For instance, their content can be censored because a model misunderstood it to be a violation of platform policies or harmful content. Advocates for African languages, digital rights, and accessibility understand the implications this has in content moderation.

NLP

Natural Language Processing

Natural Language Processing: (NLP): A subfield of computer science and linguistics concerned with understanding and analysing human language. Widely deployed in many of the technologies and software people use on a daily basis, NLP combines statistical models, machine learning, and linguistic rules to perform a wide range of tasks including sentiment analysis, machine translation, and text classification.



"We have a lot of people on these social media platforms who are communicating in local languages. And so, you find that some of the content that is in local languages cannot be detected by the platforms... Moderation systems will also not address content that is in local languages. Sometimes you find harmful content being disseminated widely or being amplified by algorithms. The lack of investment in training the models in local languages means that users will be affected."

— Victor Kapiyo, senior researcher at CIPESA

A number of factors are behind the under-representation of African languages in NLP, including a colonial past that marginalised African languages,⁴ a painful legacy that post-colonial rulers continued by retaining European languages as official or semi-official languages, and not taking adequate measures to preserve local languages.⁵ NLP systems were also not built to meet the needs of many African languages which are structurally different from English, a dominant high-resource language in NLP,⁶ or have various substantial dialectal variations. Another challenge is the lack of access to modern computing power and cloud services necessary for training models.⁷

All these obstacles exclude African languages from the NLP field. As researchers on the challenges and opportunities of NLP in low-resourced Senegalese languages noted: "Despite their societal importance and widespread use in daily communication and media, these languages remain largely excluded from the digital and scientific landscape of NLP. This gap poses a dual challenge: the risk of technological

marginalisation of major linguistic communities, and the missed opportunity to harness NLP for advancing locally grounded research, especially in the social sciences".⁸

The African Union has recognised the language challenge in its Continental African Intelligence Strategy, which includes high level recommendations to promote investment in NLP in Indigenous and local African languages.⁹ The Strategy's fifth guiding principle 'Inclusion and Diversity' states that "the production, development, use and assessment of AI in Africa will be inclusive, non-discriminatory, leaving no one and no place behind and benefiting everyone, and respectful of the diversity of African people, cultures, languages, gender dimensions and nations".

To address this gap, civil society and academic initiatives have been launched across the continent. Masakhane, "a grassroots organisation whose mission is to strengthen and spur NLP research in African languages, for Africans, by Africans"¹⁰ has been building open and high-quality data sets that support African language. This includes text and voice datasets in East African languages to support "building natural language processing models that range from spell and grammar checking, sentiment analysis, topic modeling, text summarization, misinformation and fake news detection, machine translation and automatic speech recognition models".¹¹ Another project by the Masakhane community resulted in "the first large, publicly available, high-quality dataset for named entity recognition (NER) in ten African languages".¹² An important task in NLP, NER is not only essential for automated products and functions like spell-checking and voice assistant but "it also enables identifying African names, places, and organizations for information retrieval".¹³ In another initiative, Code for Africa runs an AI Sandbox with its self-hosted LLMs allowing

partners to prototype and experiment with AI models in a secure environment and with the support of a team of engineers.¹⁴ AI sandboxes are isolated testing environments where developers and researchers can experiment with AI and trial new models.

Despite the lack of high-quality data and challenges in access to infrastructure and computing power, civil society in Africa has been experimenting with building their own small models, trained on small datasets and for specific purposes rather than the general-purpose LLMs. Civil society is “leveraging AI for advocacy, factchecking, monitoring (of elections, hate speech and disinformation), digital literacy, public accountability, and community engagement”, according to CIPESA’s 2025 State of Internet Freedom Report, which assessed implications of AI on digital democracy in 14 African countries.¹⁵



“In the women’s sexual health and reproductive sector, a lot of the organisations have been able to draw patterns based on intake of complaints or issues to do with women’s SRHR [Sexual and Reproductive Health and Rights] issues. And they have been able to conduct research both, qualitative and quantitative, and some have built small models. You hear them saying we have built this app, we have built this tool to just see if it can teach women to do this, and when you explore some of these tools, one or another, you find that actually you see it is based out of data they have collected”.

— Irene Mwendwa, Nairobi-based consultant on technology, AI and law

She mentioned as an example, Zuzi, an “African, and trauma-informed” AI chatbot developed by South African organisation GRIT

to provide information on the rights and legal services available to survivors of gender-based violence.¹⁶

In other examples in Tunisia, independent media outlet Nawaat launched Nawaat Chronicles,¹⁷ an AI-enhanced archive platform allowing readers, researchers, students and journalists to easily access and search an archive of over 22 years of independent journalism on Tunisia in Arabic, French, and English. In Kenya, Mzalendo Watch has been developing AI tools to facilitate access to parliamentary data and proceedings.¹⁸ The latter is one of several other examples of CSOs across the continent, including in Nigeria, South Africa, and Zimbabwe, developing AI tools to facilitate access to and analysis of official documents and improve transparency.¹⁹ In Senegal, Jangat, an AI-powered platform, allowed voters to compare the electoral programmes of candidates in the 2024 election.²⁰

“I have been able to see a lot of opt-in by citizens, opt-in from a point of civic duty or civic participation, where individuals are just using their knowledge on building technologies as computer scientists, as data scientists, some self-taught, some [are] young people who do not even have jobs, to really showcase how technology can be used to create social cohesion and civic engagement or public participation here in Kenya and other countries”, said Mwendwa. She added that it is unfortunate that participation and creativity are “inhibited” by government restrictions such as app restrictions and network shutdowns, as was the case during the Tanzanian election in 2025. “Africa can also harness the power of these same AI technologies to grow our democracies, our economic opportunities. At the same time, that same prowess is being used against them [African youth], communicating two very different things for young people who are just trying to seek opportunities”, she added.

REFERENCES

- 1 UNESCO. "UNESCO and the promotion of languages in Africa: cultural diversity and multilingualism". 27 February 2025. <https://www.unesco.org/en/articles/unesco-and-promotion-languages-africa-cultural-diversity-and-multilingualism> (accessed 1 May 2026).
- 2 Comic, M. "NLP vs. LLMs: What's the difference"? Lokalise. 15 May 2025. <https://lokalise.com/blog/nlp-vs-llm/> (accessed 1 May 2026).
- 3 Ibid.
- 4 Masakhane. "Our Mission". <https://www.masakhane.io/home> (accessed 1 May 2026)
- 5 Amorim, R, Baltazar, R. & Soares, I. "Linguistic legacies of British and Portuguese (de)colonization in Africa: (un)successful common bonds"? Centro de Administração e Políticas Públicas, Instituto Superior de Ciências e Políticas Públicas, Universidade de Lisboa, Portugal. 2020 (accessed 1 May 2026).
- 6 Korir, K. "The Untapped Potential: African Languages in Natural Language Processing". Medium. 27 February 2025. <https://medium.com/@kiplangatkorir/the-untapped-potential-african-languages-in-natural-language-processing-7478b78ef0bd> (1 May 2026).
- 7 Mbaye, D., Mbengue, T. D. P., Seye, M. R., Diallo, M., Ndiaye, M. L., Adjanohoun, D. S., Sow, D., Wade, C. S., Munyaka, J. C. B., & Chenal, J. (2026). Opportunities and Challenges of Natural Language Processing for Low-Resource Senegalese Languages in Social Science Research. Preprints. <https://doi.org/10.20944/preprints202601.1124.v1>
- 8 Ibid.
- 9 African Union. Continental Artificial Intelligence Strategy. July 2024. https://au.int/sites/default/files/documents/44004-doc-EN-Continental_AI_Strategy_July_2024.pdf (accessed 1 May 2026).
- 10 Masakhane. "Our Mission". <https://www.masakhane.io/home> (accessed 1 May 2026)
- 11 Masakhane. "MakerereNLP: Text & Speech for East Africa". Undated. <https://www.masakhane.io/ongoing-projects/makererenlp-text-speech-for-east-africa> (accessed 1 May 2026).
- 12 David Ifeoluwa Adelani, Jade Abbott, Graham Neubig, Daniel D'souza, Julia Kreutzer, Constantine Lignos, Chester Palen-Michel, Happy Buzaaba, Shruti Rijhwani, Sebastian Ruder, Stephen Mayhew, Israel Abebe Azime, Shamsuddeen H. Muhammad, Chris Chinenye Emezue, Joyce Nakatumba-Nabende, Perez Ogayo, Aremu Anuoluwapo, Catherine Gitau, Derguene Mbaye, Jesujoba Alabi, Seid Muhie Yimam, Tajuddeen Rabi'u Gwadabe, Ignatius Ezeani, Rubungo Andre Niyongabo, Jonathan Mukiibi, Verrah Otiende, Irero Orife, Davis David, Samba Ngom, Tosin Adewumi, Paul Rayson, Mofetoluwa Adeyemi, Gerald Muriuki, Emmanuel Anebi, Chiamaka Chukwuneke, Nkiruka Odu, Eric Peter Wairagala, Samuel Oyerinde, Clemencia Siro, Tobius Saul Bateesa, Temilola Oloyede, Yvonne Wambui, Victor Akinode, Deborah Nabagereka, Maurice Katusiime, Ayodele Awokoya, Mouhamadane MBOUP, Dibora Gebreyohannes, Henok Tilaye, Kelechi Nwaike, Degaga Wolde, Abdoulaye Faye, Blessing Sibanda, Orevaoghene Ahia, Bonaventure F. P. Dossou, Kelechi Ogueji, Thierno Ibrahima DIOP, Abdoulaye Diallo, Adewale Akinfaderin, Tendai

Marengereke, and Salomey Osei. 2021. MasakhaNER: Named Entity Recognition for African Languages. Transactions of the Association for Computational Linguistics, 9:1116–1131.

13 Ibid.

14 Code for Africa. “Actionable Information”. Undated. <https://codeforafrica.org> (accessed 1 May 2026).

15 CIPESA. State of Internet Freedom in Africa Report. 2025. <https://cipesa.org/2025/09/state-of-internet-freedom-in-africa-report/> (accessed 1 May 2026).

16 “Our Tech”. GRIT. Undated. <https://www.grit-gbv.org/technology> (accessed 2 May 2026).

17 <https://chronicles.nawaat.org/>

18 Mzalendo. “AI Tools”. <https://mzalendo.com/ai-tools/> (accessed 1 May 2026).

19 CIPESA. State of Internet Freedom in Africa Report. 2025. <https://cipesa.org/2025/09/state-of-internet-freedom-in-africa-report/> (accessed 1 May 2026).

20 Ibid.



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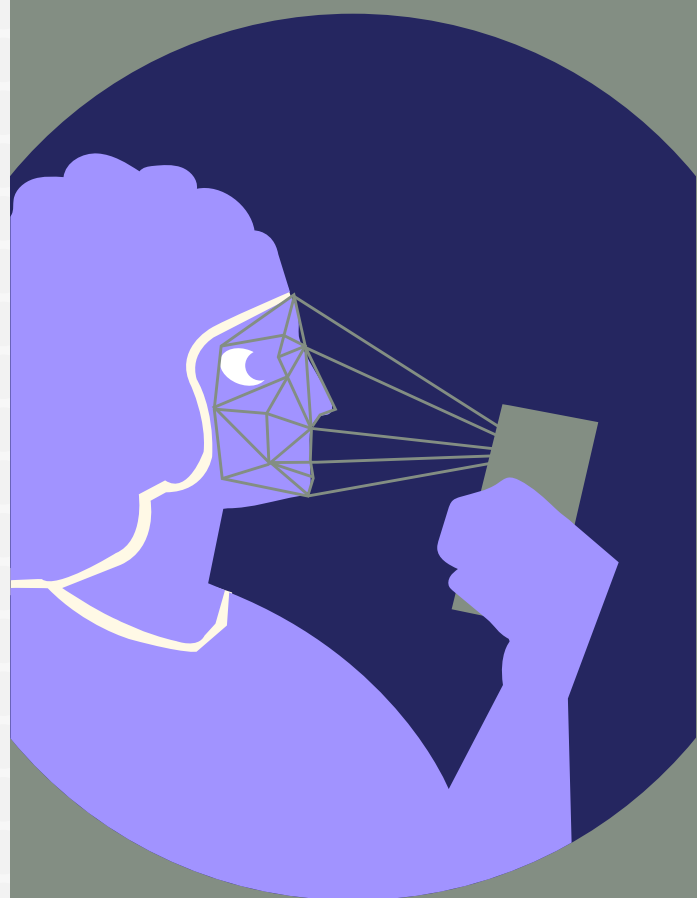
CASE STUDY:

**AI ACCOUNTABILITY
IN THE CONTEXT OF
GENOCIDE AND
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“LARGER THAN
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Palestinians in the Occupied Palestinian Territories (OPT) feel the impact of AI technologies deployed by Israel to control and subjugate them. Israel deploys biased and flawed algorithms to monitor what Palestinians are saying online under the pretext of preventing terror attacks,¹ and thereby criminalising Palestinians' calls for resistance to the occupation and an end to the genocide.² In the West Bank, networks of facial recognition track and monitor Palestinians, which hinders their freedom of movement, association, and right to peaceful assembly. The surveillance can also restrict their rights to access health services, engage in entrepreneurial activities, and worship freely.³ In the genocide in Gaza, the Israeli military has used machine learning tools that rely on mass (biometric) surveillance to track, generate, and bomb targets,⁴ in gross violation of International Humanitarian Law (IHL), in particular military necessity, proportionality, distinction between combatants and civilians, and precaution.⁵

The private sector, including tech companies, has been benefiting from the Israeli occupation and the genocide in Gaza.⁶ For example, the Israeli military and the apartheid regime rely on cloud storage provided by tech giants, including Google, Amazon, and Microsoft, to collect massive amounts of data on Palestinians through surveillance and privacy-infringing practices.

Local, regional, and international civil society has engaged in different tactics and strategies to investigate and document the impacts of these technologies on Palestinians and hold the developers, deployers, and enablers to account.



"We are looking at a situation where Israel is using AI tools in a horrendous, horrifying way and we are calling for accountability for any company or anyone who is providing them with this assistance. It is how we attempt to hold Israel accountable for war crimes and especially if we are able to impact the private companies who are involved in providing assistance to power Israel's AI systems and tools"

— Jalal Abukhater, Policy Manager at Tamleh, regarding his organisation's approach to AI accountability in the OPT.

He added that, "targeting Israel is not an easy task. We do not do that. We do not engage Israel. Israel is committing war crimes. We are engaging the companies who are seen to be complicit in those war crimes by providing assistance when it comes to AI". The organisation has also advocated at the EU level to call for stricter controls on exports of EU-manufactured technologies to Israel, which are then deployed against Palestinians.

Tech workers also have been organising through campaigns such as No Azure for Apartheid⁷ and No Tech for Apartheid to demand that Microsoft, Google, and Amazon end their cloud storage contracts with the Israeli government. Campaigns include internal petitions, sit-ins, walk-outs and public pressure. In some cases, employees have faced retaliation⁸ for their activism, including termination, doxxing, and surveillance⁹. Activists have also protested at events such as the United Nations AI for Good Summit in Geneva in July 2025, calling out those actors that have enabled Israel's AI-assisted genocide against Palestinians in Gaza¹⁰ as well as at a Google event¹¹ at the AI+ Expo in Washington D.C.¹²

Sustained pressure has paid off, in some cases, with Microsoft announcing in September 2025 that it had terminated an infamous Israeli military unit's access to "specific cloud storage and AI services and technologies", although the company still provides other services to the Israeli military.¹³ The unit in question, Unit 8200, runs a massive surveillance program that has "collected, stored, replayed and analyzed millions of civilian phone calls from Gaza and the West Bank", as documented by a joint investigation between the Guardian, Israeli-Palestinian publication +972 Magazine and the Hebrew-language media outlet Local Call.¹⁴

In addition, civil society groups and researchers successfully pushed for a ban on fully autonomous weapons at the UN Convention on Certain Conventional Weapons,¹⁵ with the UN Secretary-General calling for Member States to set clear regulations and prohibitions on such systems by 2026.¹⁶ Strategic litigation has been used as a path of resistance against European governments for their exports of weapons to Israel, for example, in the UK¹⁷ and the Netherlands.¹⁸

Despite these efforts, and evidence of the impacts of these technologies, accountability remains elusive. Globally, amid an unchecked AI race, there is a lack of willingness to institute protections from AI's most salient harms. For Palestinians in the West Bank and Gaza, the occupation deprives them of the most basic protection, including due process and self-determination. AI accountability starts with holding Israel to account for its occupation and war crimes, as Abukhater reiterated:

Sustained pressure, tangible results



July 2025

Activists protest at the UN AI for Good Summit in Geneva, and at a Google event at the AI+ Expo in Washington D.C.



September 2025

Microsoft announces it terminated Unit 8200's access to "specific cloud storage and AI services and technologies"



2026

Deadline set by the UN Secretary-General for Member States to establish clear regulations and prohibitions on fully autonomous weapons systems

"There is no infrastructure to protect people, to regulate the use of AI tools. A big obstacle is that we are under occupation, there is no sovereignty, there is no self-determination. People are not able to just go to a court and say that my rights are being violated by the use of this AI system, and this court would listen to us, there is no such thing. The AI in Palestine is being used to commit crimes against humanity in a systematic and regular way. So, for us, accountability starts with accountability for Israel not just on AI, but to hold Israel accountable for the illegal occupation of occupied territory. We call on countries to respect their obligations and duties towards not supporting Israel's occupation, and there is an ICJ court ruling that ordered Israel to cease or end the occupation, and third countries have a responsibility to respect the ICJ orders. So for us, the issue of accountability is much larger than just AI itself".

The AI technologies of repression that Israel deploys to subjugate and control Palestinians and commit genocide in Gaza have even wider repercussions for the entire world. Israel's military industrial complex, a leading exporter of military and surveillance technology around the world, has long made Palestine a testing ground for its latest weapons and technologies of repression, including border and surveillance systems, and spyware and attack drones. Palestine is "Israel's workshop, where an occupied nation on its doorstep provides millions of subjugated people as a laboratory for the most precise and successful methods of domination", wrote Antony Loewenstein in his book, *The Palestine Laboratory*.¹⁹

As Dima Samaro, a Palestinian lawyer and researcher, and director of Skyline International for Human Rights, told CIVICUS in an interview in July 2025, "Gaza serves as a warning".²⁰ "As militarised AI becomes normalised, the language of 'precision' and 'efficiency' masks atrocity. The lesson from Gaza is clear: when AI-powered machines control who lives, human rights die. This transcends Palestine's tragedy – it foreshadows everyone's future", she added.

Despite the obstacles and the lack of resources, civil society groups and activists in Palestine and beyond continue to demand accountability and justice through public campaigns, strategic litigation, disruptive actions, worker campaigns and boycotts. The different campaigns and coalitions that have emerged from this fight need sustained support in the face of powerful governments that refuse to regulate dangerous AI systems and an industry with the resources and influence to undermine any form of regulation that could reign in their technologies and therefore affect their profits.



"Gaza serves as a warning. As militarised AI becomes normalised, the language of 'precision' and 'efficiency' masks atrocity. The lesson from Gaza is clear: when AI-powered machines control who lives, human rights die. This transcends Palestine's tragedy – it foreshadows everyone's future"

— Dima Samaro, Palestinian lawyer and researcher, director of Skyline International for Human Rights.



"The obstacles we are facing is that we are going up against very big, large companies, huge companies. And our concerns are not really backed up by institutions or a regulatory body that is actually influential or powerful. We are talking as a civil society with very limited resources on those big issues, but we are facing a larger problem when it comes to lack of regulation, lack of infrastructure and lack of capacities to influence the policies on the AI tools that are used here"

— Jalal Abukhater, Policy Manager at Tamleh

REFERENCES

- 1 AP. "Israel claims 200 attacks predicted, prevented with data tech". 12 June 2018. <https://www.cbsnews.com/news/israel-data-algorithms-predict-terrorism-palestinians-privacy-civil-liberties/> (accessed 4 May 2026).
- 2 Aljazeera. "Dareen Tatour sentenced to five months in prison over poem". 31 July 2018. <https://www.aljazeera.com/news/2018/7/31/dareen-tatour-sentenced-to-five-months-in-prison-over-poem> (accessed 30 April 2026).
- 3 Amnesty International. "Israel and Occupied Palestinian Territories: Automated Apartheid: How facial recognition fragments, segregates and controls Palestinians in the OPT". <https://www.amnesty.org/en/documents/mde15/6701/2023/en/> 2 May 2023. (accessed 4 May 2026).
- 4 Human Rights Watch. "Questions and Answers: Israeli Military's Use of Digital Tools in Gaza". 10 September 2014. https://www.hrw.org/news/2024/09/10/questions-and-answers-israeli-militarys-use-of-digital-tools-in-gaza#_What_are_some (accessed 1 May 2026).
- 5 Düz, S. & Koçakoğlu, M.S. 'Deadly Algorithms: Destructive Role of Artificial Intelligence in Gaza War'. Foundation For Political, Economic And Social Research. February 2020. <https://media.setav.org/en/file/2025/02/deadly-algorithms-destructive-role-of-artificial-intelligence-in-gaza-war.pdf>
- 6 OHCHR. "A/HRC/59/23: From economy of occupation to economy of genocide – Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967". 2 July 2025. <https://www.ohchr.org/en/documents/country-reports/ahrc5923-economy-occupation-economy-genocide-report-special-rapporteur> (accessed 4 May 2026).
- 7 No Azure for Apartheid. "The Workers' Toolkit". Undated. <https://noazureforapartheid.com/toolkit/> (accessed 1 May 2026).
- 8 No Azure for Apartheid. "Microsoft: End Complicity in Apartheid and Genocide". Action Network. Undated. <https://actionnetwork.org/petitions/microsoft-end-complicity-in-apartheid-and-genocide> (accessed 4 May 2026).
- 9 Day, M. and Ford, B. "Microsoft Asked FBI for Help Tracking Palestinian Protests". Bloomberg. 26 August 2025. <https://www.bloomberg.com/news/articles/2025-08-26/microsoft-asked-fbi-for-help-with-israel-gaza-protests?srnd=phx-technology&embedded-checkout=true> (accessed 4 May 2026).
- 10 Binnur Donmez, B. "Protest in Geneva slams AI for Good Summit over big tech's reported role in Gaza war". Anadolu Agency. 28 July 2025. <https://www.aa.com.tr/en/europe/protest-in-geneva-slams-ai-for-good-summit-over-big-techs-reported-role-in-gaza-war/3625487> (accessed 4 May 2026).
- 11 Ibid.
- 12 CODEPINK. ""You are killing people in Palestine!" CODEPINK and No Tech for Apartheid Disrupt Google at AI+ Expo". 3 June 2025. <https://www.codepink.org/googledisruptjune3> (accessed 4 May 2026).
- 13 Amnesty International. "Israel/IOPT: Microsoft's move to block Israeli military unit's access to its mass surveillance technology is a moment for corporate reckoning". 26 September 2025. <https://www.amnesty.org/en/latest/news/2025/09/microsoft-block-israel-military-unit-from-using-its-rapporteur> (accessed 4 May 2026).

- [technology/](#) (accessed 4 May 2026).
- 14 Ibid.
- 15 CIVICUS. "AI-powered weapons depersonalise the violence, making it easier for the military to approve more destruction". 23 November 2024. <https://lens.civicus.org/interview/ai-powered-weapons-depersonalise-the-violence-making-it-easier-for-the-military-to-approve-more-destruction/> (accessed 1 May 2026).
- 16 "UN News. 'Politically unacceptable, morally repugnant': UN chief calls for global ban on 'killer robots'". 14 May 2025. <https://news.un.org/en/story/2025/05/1163256> (accessed 4 May 2026).
- 17 Amnesty International. "Case of Al Haq v Secretary of State for Business and Trade: Written submissions of Human Rights Watch and Amnesty International UK". 13 May 2025. <https://www.amnesty.org.uk/knowledge-hub/all-resources/submission-aiuk-ban-arms-sales-israel/> (accessed 4 May 2026).
- 18 ELSC. "Court appeal: confronting the role of the Dutch state in genocide". <https://elsc.support/court-appeal-confronting-the-role-of-the-dutch-state-in-genocide/> (accessed 4 May 2026).
- 19 Loewenstein, A. The Palestine Laboratory: How Israel exports the technology of occupation around the world. Verso Books, 2023
- 20 CIVICUS. "The lesson from Gaza is clear: when AI-powered machines control who lives, human rights die". 16 July 2025. <https://lens.civicus.org/interview/the-lesson-from-gaza-is-clear-when-ai-powered-machines-control-who-lives-human-rights-die/> (accessed 3 May 2026).



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In December 2024, the Federal Senate in Brazil approved AI-related legislation, Bill No. 2338/2023. This comprehensive law sets out principles, rules, and mechanisms for regulating AI in a way that is aligned with fundamental rights and democratic values. It adopts a risk-based approach to AI governance, similar to the EU AI Act, establishing three tiers of AI systems.¹ Systems that pose excessive risk shall be prohibited; high risk shall be heavily regulated; and other systems must meet basic requirements of regulation. The legislation also mandates assessments of algorithmic impact for high-risk systems and human oversight and strict requirements for AI use in the public sector. It further establishes several rights for individuals interacting with AI systems, including the right to explanation and the right to contest decisions that significantly impact them.

At a glance: Bill 2338/2023

- **Prohibited:** systems that pose excessive risk
- **Heavily regulated:** high-risk systems
- **Basic requirements:** all other systems

This law was first proposed in 2023 but had to be reviewed and voted on by the House of Representatives and adopted by the President. It is still unclear when it will be adopted and how the bill will look before it is adopted. However, the law is considered a win for civil society in Brazil which has been advocating for human rights-based regulation of AI.²

In fact, another bill that was first proposed to

regulate AI in the country, draft Bill no.21/2020 adopted “a very light touch and minimalistic approach” with “several substantial gaps, being either laconic or vague as regards some key elements such as risk assessment and oversight mechanisms”.³ This bill “was really favoured by the industry,” said Yamin Curzi, a professor at the Centre for Technology and Society at Fundação Getulio Vargas (FGV) Law School in Rio de Janeiro. “But of course, civil society pushed a lot against this, because it would not give the process of accountability and the due process that we needed to have, actually, governance of the AI systems. We would have only the industry regulating itself. So then, civil society pushed against this. We had a lot of push by civil society organizations back then and a lot of debates, also in academia”. As a result of the civil society pressure, including Coalizão Direitos na Rede (CDR), a coalition of 51 academic and civil society organisations in defense of digital rights,⁴ Brazil’s Senate launched multistakeholder public hearings and consultations for a substitute bill.



academic and civil society organisations form the **Coalizão Direitos na Rede (CDR)**

As part of its efforts, CDR, which has conducted campaigning and advocacy on AI regulation in the country, published petitions,⁵ sent letters to lawmakers,⁶ submitted input for an alternative bill,⁷ and engaged directly with members of parliament.⁸ CDR has also

conducted legal analysis and campaigned for a ban on the use of facial recognition technology in public spaces.⁹

While civil society has been successful in pushing back against the initial AI draft bill and shaping a more robust alternative, a long road still lies ahead, as the tech industry and lawmakers can still undermine human rights-based regulation of AI. Already the version of Bill No. 2338/2023 that was approved by the Senate in December 2024 had been re-shaped. For example, under pressure from technology companies, algorithmic systems to recommend content were not listed under the high-risk category and most references to ‘information integrity’ or ‘freedom of expression’ were removed after Big Tech companies and members of the opposition equated such references with ‘censorship’.¹⁰ Pressure came not only from Big Tech companies, as Laís Martins, a Brazilian investigative journalist based in São Paulo, wrote for Policy Tech Press: “Advocates for a weaker regulatory approach (or no regulation at all) were joined by Brazilian industry groups and data center executives, all echoing a big tech narrative that regulation would hinder innovation. To some extent, their efforts were successful in weakening what started out as a very ambitious bill”.

“Both bills are still alive because people are trying to push for AI regulation also with this principled logical approach still nowadays...Bill 2338/2023 is being discussed. It was approved in the National Chamber, but because when the Senate approves a bill, it goes back to the National Deputy Chamber for revisions, and then again goes to the Senate, to be sent out to the federal government for final ratification, before it is signed to be enforced. They try to retrieve some of the due process rules because of the lobby of big tech, especially by Microsoft, but also, AI enterprises and associations of industries, especially linked

to the agribusiness here in Brazil because we have tons of AI deployments in agribusiness”, asserted Professor Curzi.

While civil society continues the fight,¹¹ they face obstacles in their advocacy efforts: “most of these [government] agencies are based in Brasilia, the capital of Brazil. Civil society is not there. Civil society is in Rio, in Sao Paulo, in the Northeast but not in Brasilia. It is really expensive to have a lawyer. It is really expensive for them to do advocacy all the time. And for the enterprises, it is not. They go all the time there, they have this capacity of being in private spaces with the regulators..and they established links to and relationships with these people [regulators and lawmakers]”, Curzi declared.

In the meantime, Brazilians belonging to excluded groups, including Black and Indigenous people, continue to face discrimination in AI systems. Facial recognition cameras are widely deployed in public and private spaces with little protection, transparency, and oversight, thus posing risks to privacy, freedom of expression, and freedom of association. Brazil’s civic space was rated as obstructed by the CIVICUS Monitor in 2025, a rating it has retained since 2018.

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— Yasmin Curzi, professor, Centre for Technology and Society, FGV Law School.

REFERENCES

- 1 Atanasovska, D. and Robeli, L. "Brazil's AI Act: A New Era of AI Regulation". GDPR Local. 26 February 2026. <https://gdprlocal.com/brazils-ai-act-a-new-era-of-ai-regulation/> (accessed 1 May 2026).
- 2 Coalizão Direitos na Rede. "Regulação iA O Que Tenho a Ver Com Isso". August 2023. <https://direitosnarede.org.br/campanha/inteligencia-artificial-o-que-eu-tenho-a-ver-com-isso/> (accessed 1 May 2026).
- 3 Belli, Luca and Curzi, Yasmin and Britto Gaspar, Walter, AI Regulation in Brazil: Advancements, Flows, and need to Learn from the Data Protection Experience (April 16, 2023). Available at SSRN: <https://ssrn.com/abstract=6080726> or <http://dx.doi.org/10.2139/ssrn.6080726>
- 4 Coalizão Direitos na Rede. "CARTA DE APOIO AO PL 2338/2023". 14 June 2023. <https://direitosnarede.org.br/2023/06/14/carta-de-apoio-ao-pl-2338-2023/> (accessed 1 May 2026).
- 5 Coalizão Direitos na Rede. "¡Firma la petición! POR UNA REGULACIÓN DE IA PARTICIPATIVA Y RESPONSABLE". 14 April 2023. <https://direitosnarede.org.br/2023/04/14/firma-la-peticion-por-una-regulacion-de-ia-participativa-y-responsable/> (accessed 1 May 2026).
- 6 Coalizão Direitos na Rede. "Regulação da IA protetiva de direitos, já! Urgência de transparência e maior participação da sociedade civil nos debates do PL 2338". 10 December 2025. <https://direitosnarede.org.br/2025/12/10/regulacao-da-ia-protetiva-de-direitos-ja-e-maior-participacao-sociedade-civil-pl-2338/> (accessed 1 May 2026).
- 7 Coalizão Direitos na Rede. "Regulação de Inteligência Artificial: Contribuição da CDR para a Comissão de Juristas do Senado". 6 July 2022. <https://direitosnarede.org.br/2022/07/06/regulacao-de-inteligencia-artificial-contribuicao-da-cdr-para-a-comissao-de-juristas-do-senado/> (accessed 1 May 2026).
- 8 Coalizão Direitos na Rede. "Coalizão Direitos na Rede intensifica diálogo sobre IA no Congresso e defende regulação com foco na proteção de direitos". 5 November 2025. <https://direitosnarede.org.br/2025/11/05/coalizao-direitos-na-rede-intensifica-dialogo-sobre-ia-no-congresso-e-defende-regulacao-com-foco-na-protecao-de-direitos/> (accessed 1 May 2026).
- 9 "A Call for General Ban on the Use of Facial Recognition Technologies on Public Security". <https://tiremeurostodasuamira.org.br/en/home-eng/> (accessed 1 May 2026).
- 10 Martins, L. "Brazil's AI Law Faces Uncertain Future as Big Tech Warms to Trump". Tech Policy Press. 4 February 2025. <https://www.techpolicy.press/brazils-ai-law-faces-uncertain-future-as-big-tech-warms-to-trump/> (accessed 1 May 2026).
- 11 Coalizão Direitos na Rede. "Regulação da IA protetiva de direitos, já! Urgência de transparência e maior participação da sociedade civil nos debates do PL 2338". 10 December 2025. <https://direitosnarede.org.br/2025/12/10/regulacao-da-ia-protetiva-de-direitos-ja-e-maior-participacao-sociedade-civil-pl-2338/> (accessed 1 May 2026).



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The Digital Democracy Initiative (DDI) is a programme to safeguard inclusive democracy and human rights in the digital age. It focuses on supporting local civil society in the Global South, particularly in countries undergoing democratic regression and where civic space is under pressure.

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