Prescription Drugs in Pregnancy and Childbirth, 2026-045-IG-UA (User Appeal)
Public Comment Submission to Meta Oversight Board
By Jennifer Pinsof and Jillian C. York, Electronic Frontier Foundation

Introduction

As reproductive rights face growing attacks globally, access to accurate reproductive and maternal health information, especially online, has never been more critical. Yet overenforcement against reproductive and maternal health content on Meta's platforms is rampant. Our 2025 project, Stop Censoring Abortion, confirmed a number of instances in which Meta, as well as other platforms, removed vital reproductive health information, including information about medications that are legal in many jurisdictions but were removed under Meta's community standard on Restricted Goods and Services.

Restricting access to essential healthcare information can have life or death consequences. At a time when reproductive rights are under attack, overenforcement threatens freedom of information and disproportionately harms communities that are already facing barriers to—and a lack of information about—reproductive care.

Tracking Meta's Suppression of Reproductive Health Information

For well over a year, the Electronic Frontier Foundation ("EFF") investigated stories from users whose reproductive health content was taken down or otherwise suppressed by major social media platforms. We launched the Stop Censoring Abortion project to collect examples of this censorship, with the goal of better understanding the breadth of the problem, who is affected, and with what consequences. While the focus of our project was information about abortion, which is just one facet of reproductive healthcare, the responses we received and our findings apply to the broader healthcare context.

Thanks to nearly 100 submissions from healthcare providers, clinics, educators, advocates, and researchers around the world, we confirmed what many already suspected: this speech is being removed, restricted, and silenced by platforms at an alarming rate. Together, our findings paint a clear picture of censorship in action: Meta's moderation systems are not only broken, but are actively harming those seeking and sharing vital reproductive health information.

Our Findings

EFF's Stop Censoring Abortion project is relevant to the questions the Oversight Board has posed and we recommend it. Here, we highlight a few examples.

Across the submissions we received, we saw systemic over-enforcement, vague and convoluted policies, arbitrary takedowns, sudden account bans, and ignored appeals.

In almost every case we reviewed, **the censored posts and accounts did *not* violate any of the platforms' stated rules**. The most common reason Meta gave for removing reproductive health content was that it violated policies on Restricted Goods and Services, which prohibit any "attempts to buy, sell, trade, donate, gift or ask for pharmaceutical drugs." But almost all of the content submitted simply provided factual, educational information that clearly were not "attempts to buy, sell, trade, donate, or ask for."

Consider the case we documented regarding the Miscarriage+Abortion Hotline (M+A Hotline). Its Instagram account was restricted, and numerous posts taken down because they purportedly repeatedly violated the Illegal or Regulated Goods guidelines. But although M+A Hotline had posted guidance on how to legally obtain pharmaceutical drugs, it had not offered any pharmaceuticals for sale or trade, etc. The account also shared posts that affirmed the voices and experiences of abortion seekers, asserted the safety of medication abortion, and spread the word about the expert support that the hotline offers, all of which were affected by Meta's restrictions. The misclassification thus deprived patients, advocates, and researchers of reliable information, and chilled those trying to provide accurate and life-saving reproductive health resources.

In other examples, educational information about the availability of US FDA-approved drugs mifepristone and misoprostol was removed under the same policy. Both the Red River Women's Clinic and RISE, a reproductive health research center at Emory University, had their Facebook and Instagram, respectively, accounts locked because they posted about mifepristone; both accounts were ultimately restored but not without great damage to each entity's outreach efforts.

In yet another example, health policy strategist Lauren Kahre posted an "FYI" to Threads stating:

> "Abortion Pills (aka mifepristone and misoprostol) are great to have around whether you anticipate needing them or not. Plan C pills is an amazing resource to help you find reliable sources for abortion pills, no matter where you live. Once received, the pills should be ket in a cool, dry place. The shelf life of mifepristone is about 5 years; the shelf life of misoprostol is about two years. There is a misoprostol only regime that is extremely safe, effective and very common globally."

Once again, Meta took the post down, incorrectly claiming that it violated its policy that forbids "people to buy, sell, or exchange drugs that require a prescription from a doctor or a pharmacist."

Many users also faced sudden account bans without warning or clear justification. Though Meta's policies dictate that an account should only be disabled or removed after "repeated" violations, organizations like Women Help Women received no warning before seeing their critical connections cut off overnight.

In another troubling trend, many of our submitters reported experiencing "shadowbanning" and de-ranking, where posts weren't removed but were instead quietly suppressed by the algorithm. This kind of suppression leaves advocates without any notice, explanation, or recourse—and severely limits their ability to reach people who need the information most. Our understanding is that these measures are intended to restrict the recommendation of such content; **our opinion is that content intended to educate the public or share experiences about reproductive health, including relevant medication, should not be suppressed in this way**.

We also came across at least one instance in which an account sharing information about abortion pills was suspended under a different policy. Samantha Shoemaker, an individual posting information about abortion care, shared posts on Instagram that included a video linking to the website of Plan C, which lists organizations providing abortion pills indifferent states; an image from Plan C's Instagram account encouraging people to learn about advance provision of abortion pills; and a clip of women discussing their experiences with the medication. Her account was flagged and posts were inexplicably removed under Meta's "dangerous organizations and individuals" policy.

Finally, we learned that Meta's enforcement outcomes were deeply inconsistent. Users often had their appeals denied and accounts suspended until someone with insider access to Meta could intervene. For example, the Red River's Women's Clinic, RISE at Emory, and Aid Access each had their accounts restored only after press attention or personal contacts stepped in. This reliance on backchannels underscores the inequity in Meta's moderation processes: without connections, users are left unfairly silenced.

Recommendations

Our research demonstrates that Meta engages in widespread removal and suppression of content related to reproductive care that does not, in fact, violate its policy on restricted goods and services. Furthermore, the actions toward users are, in some cases, overly punitive.

We recognize that when it comes to certain medications that may be legal in some jurisdictions and illegal in others—or in the case of fentanyl, legal when prescribed, but in other cases, a drug of abuse—it can be challenging for Meta to accurately moderate posts. But when it comes to individuals like the experts and resource providers discussed above sharing vital educational information about legal medication, Meta's policies and often-

scattershot enforcement can seriously affect users' ability to find reliable and trustworthy firsthand experiences and information.

Based on our findings, we call on Meta to take these concrete steps to improve moderation of reproductive and maternal health content:

1. Publish clear and understandable policies.

Too often, Meta's guidelines force its users to guess what speech might lead to deleted posts, suspended accounts, and account restrictions, leading to needless self-censorship. To prevent this chilling effect, Meta must offer users the greatest possible transparency and clarity on its policies. The policies should be clear enough that users know what is allowed and what isn't so that, for example, no one is left wondering how exactly a clip of women sharing their abortion experiences could be mislabeled as violent extremism.

The Santa Clara Principles offer a few more pointers. Meta should draft and publish policies such that users can readily understand:

- What types of content are prohibited by the company and will be removed, with detailed guidance and examples of permissible and impermissible content;
- What types of content the company will take action against other than removal, such as algorithmic downranking, with detailed guidance and examples on each type of content and action; and
- The circumstances under which the company will suspend a user's account, whether permanently or temporarily.

2. Enforce rules consistently and fairly.

If a users' speech doesn't violate a platform's stated policies, it should not be removed. And, per Meta's own policies, an account should not be suspended for violations if it has not received any prior warnings or "strikes." Yet, as many of the survey submissions showed, reproductive rights advocates often faced takedowns and account suspensions because of posts that fully comply with Meta's Community Standards. On such a massive scale, this erodes trust and chills entire communities from participating in critical conversations.

3. Provide meaningful transparency in enforcement actions.

When posts and accounts are removed or restricted, Meta often gives vague, boilerplate explanations—or none at all. Meta should provide affected users with substantive and accurate explanations that state the policy violated, reflect the reasoning behind the actual enforcement decision, and ways to appeal the decision. Clear explanations are key

to preventing wrongful censorship and ensuring that platforms remain accountable to their commitments and to their users.

4. Guarantee functional appeals.

Users should have a reliable and efficient appeal process that does not depend on insider access. Every user deserves a real chance to challenge improper enforcement decisions and have them reversed. But based on our survey responses, Meta's appeals process seems broken. Many users reported that they did not receive responses to appeals, even when the posts clearly did not violate Meta's policies, and thus had no meaningful way to challenge takedowns. Alarmingly, we found that a user's best (and sometimes only) chance at success is to rely on a personal connection at Meta to right wrongs and restore content. This is unacceptable.

5. Expand human review.

Finally, reproductive healthcare appears to be one of the highly contextual and highly nuanced topics for which automated systems appear ill-suited. Automated systems appear to mistake educational information for hawking, misinterpret words, miss important cultural or political context, and wrongly flag legitimate advocacy as "dangerous." Therefore, Meta must expand the role that human moderators play in reviewing auto-flagged content violations when posts involve sensitive healthcare information or political expression.

Users Deserve Better

Meta has already made the choice to allow speech about reproductive health care, including abortion, on its platforms, and it has not hesitated to highlight that commitment whenever it has faced scrutiny. Now it's time for Meta to put its money where its mouth is.

Users deserve better than a system where rules are applied at random, appeals go nowhere, and vital reproductive health information is needlessly (or negligently) silenced. We believe that content intended to educate the public about reproductive health should be handled with care. If Meta truly values free speech, it must commit to moderating with fairness, transparency, and accountability.

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For more information, our 10-part blog series documenting the findings from our Stop Censoring Abortion campaign can be found below or at https://www.eff.org/pages/stop-censoring-abortion.

- OVERVIEW: Our Stop Censoring Abortion Campaign Uncovers a Social Media Censorship Crisis

- UNEQUAL ENFORCEMENT: When Knowing Someone at Meta Is the Only Way to Break Out of "Content Jail"
- DANGEROUS ORGANIZATIONS: Companies Must Provide Accurate and Transparent Information to Users When Posts are Removed
- SHADOWBANNING AND DE-RANKING: Going Viral vs. Going Dark: Why Extremism Trends and Abortion Content Gets Censored
- BANS WITHOUT WARNING: Meta is Removing Abortion Advocates' Accounts Without Warning
- PROVIDERS SILENCED: The Abortion Hotline Meta Wants to Go Dark
- AD POLICIES: Decoding Meta's Advertising Policies for Abortion Content
- CALL TO PLATFORMS: Platforms Have Failed Us on Abortion Content. Here's How They Can Fix It.
- WHAT YOU CAN DO*:* Tips to Protect Your Posts About Reproductive Health From Being Removed
- WHAT WE LEARNED: #StopCensoringAbortion: What We Learned and Where We Go From Here