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GAC Public Comments on the Review of Reviews Draft Report

Introduction

ICANN's Governmental Advisory Committee (GAC) submits these comments in response to the [ICANN Public Comment proceeding](#) on the [Review of Reviews Draft Report](#) (hereafter: Draft Report).

The GAC welcomes the opportunity to comment and appreciates the work of the Review of Reviews Cross Community Group (Reviews CCG). Across the [ICANN84 Dublin](#), [ICANN85 Mumbai](#) and [ICANN86 Seville](#) Communiqués, the GAC supported the community's efforts to make ICANN's reviews more efficient, effective and workable. In those Communiqués, the GAC stressed the need to preserve important review functions, while ensuring each review has a clear purpose and also keeping ICANN's review requirements manageable for the volunteer community, see also the Dublin Communiqué.

The GAC agrees that the Draft Report is a useful step in that direction. The proposed Reviews Scoping Committee (RSC), resource checks and deferral mechanisms respond to some of the concerns the GAC has previously raised. The GAC nevertheless considers that some further refinements would be helpful, particularly to ensure the combined reviews-related workload remains manageable, preserve the GAC's existing review arrangements under the Bylaws, and maintain the Security, Stability and Resiliency (SSR) Review as a separate, mandatory review.

General Comments

1. Workload, sequencing and inclusive participation

As an overarching comment, the GAC believes that any innovations in ICANN's review framework should consider the overall workload and burden on the community and prioritize streamlining of efforts where practicable, to avoid an overload.

The ability to participate in complex and sustained review processes is not evenly distributed across the ICANN community. Participants from least developed countries face particular constraints relating to staff time, expertise, connectivity, language and travel resources. A review may therefore be technically feasible, while still being difficult for important parts of the community to access and influence meaningfully.

While the GAC already contributes to ICANN reviews, its involvement would have to expand across a wider range of review processes. The GAC's review-related obligations, as currently proposed in the Draft Report, would include representation on the standing RSC, consultation and endorsement at key scoping stages, participation in review teams, ongoing liaison with GAC-appointed representatives and formal 'sign-off' on final reports before they are sent to the Board [see Draft Report, Sections 2.2-2.3, 3.1.1 and 3.2].

The GAC welcomes the provisions requiring the RSC to assess resources, timing and community capacity and allowing reviews to be deferred where needed. These are useful safeguards. They do not, however, show how the full system would operate in practice, not least because scoping, endorsement and possible implementation work also draw on the GAC's, as well as the wider community's, capacities and resources.

The GAC further notes that, while the Draft Report establishes the Reviews Scoping Committee (RSC) as the central body responsible for identifying and refining review topics, it does not explain the internal decision-making methodology by which the RSC reaches agreement on the final slate of topics before they are submitted to the SOs and ACs for endorsement.

Similarly, while the Draft Report envisages transparent RSC deliberations, it does not require publication of the rationale used to assess proposed topics against the scoping criteria. Nor does it clearly explain the ICANN Board's role once review topics and charters have received community endorsement. Greater clarity on both points may help understand how review priorities are determined and how community-led scoping aligns with the Board oversight function.

The GAC therefore asks that the Final Report:

- Include a single indicative calendar showing the cadence, sequencing and likely overlap of scheduled and recurring review-related work, including scoping and implementation;
- Establishes an explicit general presumption against running multiple reviews at the same time, with any exception supported by a capacity assessment;
- Confirms that the proposed pre-launch assessments will be transparent and will consider community, Board and ICANN org capacity as a whole;
- Requires those assessments to consider barriers to meaningful participation across the geographic and economic diversity of the ICANN community, including the needs of participants from least developed and landlocked developing countries;
- Ensures that key review materials, decisions and supporting explanations are written in accessible language and, where appropriate, made available in ICANN's working

languages to increase chances for meaningful engagement across all of ICANN's regions;

- Clarifies the RSC's internal decision-making mechanism and thresholds;
- Requires publication of the reasons for accepting, merging or excluding proposed review topics, including how the relevant scoping criteria were applied; and
- Clarifies the nature and limits of Board action following community endorsement, including the process and published rationale required where the Board cannot approve a review charter as submitted, and whether the charter must then be returned to the RSC and endorsing SOs and ACs for further consideration.

2. Reviews concerning the GAC

[ICANN's Bylaws](#) note in [Section 4.4](#) that the GAC is excluded from the independent Organizational Reviews that apply to other Supporting Organizations (SOs) and Advisory Committees (ACs) and, in Section 4.4(b), requires the GAC to provide its own review mechanisms. Separately, [Section 4.6\(b\)\(ii\)\(B\)](#) expressly identifies the review scope of the Accountability and Transparency Review (ATR) as it pertains to the GAC.

The Draft Report assigns the Section 4.6(b)(ii)(B) assessment area to the proposed new Structural Review rather than maintaining it as part of the ATR. The new Structural Review appears to have a wide remit, covering the structures, operations and interactions of SOs and ACs, while the On-Demand Review framework does not expressly exclude topics concerning the GAC – this risks overlapping areas of scope for different types of reviews as far as the GAC is concerned. The GAC notes that the Draft Report reflects the ongoing transition from Organizational Reviews to the pilot Continuous Improvement Program (CIP), but does not explain whether or how the GAC's distinct position under Bylaws Section 4.4(b) would be preserved. The GAC is not seeking to diminish accountability arrangements set out in the Bylaws, rather we seek to preserve the current balance and avoid broader or duplicative obligations.

The GAC therefore asks that the Final Report's recommendations:

- Preserves the GAC's responsibility under Bylaws Section 4.4(b) to provide its own review mechanisms, including its discretion over their design, scope and operation;
- Confirms that the Structural Review, CIP and On-Demand Review framework will not expand the GAC's obligations to assess, or be assessed, on its internal structure, operations or effectiveness;
- If the Section 4.6(b)(ii)(B) assessment area were to be assigned to the Structural Review, retains its current substantive scope, and draws a clear boundary with the ATR, particularly for GAC-Board interaction, so that the underlying issues are not subject to multiple review mechanisms; and
- Preserves the advisory nature of recommendations concerning the GAC.

3. Security, Stability and Resiliency Review

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Under the current Bylaws, SSR is a separate periodic review that must normally be conducted at least every five years – with an option for deferral. The GAC understands that the Draft Report allows SSR matters to be considered as topics within an ATR and would create periodic opportunities to decide whether a focused SSR review should be convened.

In the GAC's view, this would create regular opportunities to consider SSR issues, but it would not preserve a requirement to conduct a dedicated SSR Review: a regular check on whether a review is needed is not the same as a regular review. Making SSR a fixed topic in every ATR would improve predictability, but it may risk making the ATR too broad and may not provide the same specialist expertise as a separate review.

Focused On-Demand Reviews could still be useful when a particular issue needs attention; in the GAC's view they should, however, supplement, not replace, the mandatory SSR Review.

The GAC therefore asks that the Final Report:

- Preserves SSR as a separate, mandatory Bylaws review conducted on a regular and predictable cycle;
- Provides mechanisms for timely follow-up on the recommendations stemming from SSR;
- Allows limited, justified and time-bound deferrals, consistent with the approach already proposed for the ATR;
- Allows the scope of each SSR Review to be tailored to current risks and progress in implementing earlier recommendations.

Conclusion

The GAC appreciates the Reviews CCG's work. The GAC considers that the changes proposed in these comments would help make the overall workload more manageable and inclusive, preserve the GAC's current arrangements under the Bylaws, maintain a clear and focused review path for SSR, and provide greater clarity on the future treatment of CCT, without weakening ICANN's accountability. The GAC looks forward to the Reviews CCG's consideration of its input.