

European Digital Media Observatory

V.D.D: Report on main trends
and legal developments at
national level on
disinformation and national
policies during the electoral
campaigns
**/ Policies to tackle
disinformation in EU member
states – part 2**

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Project number:	SMART 2019/1087
Project Acronym:	EDMO
Project title:	European Digital Media Observatory
Start date of the project:	01/06/2020
Duration of the project:	30
Project website address:	https://edmo.eu/
The deliverable has been elaborated by:	Centre for Media Pluralism and Media Freedom / Task V of EDMO



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Policies to tackle disinformation in EU member states – part 2

Authors: Konrad Bleyer-Simon, Elda Brogi, Iva Nenadić, Teona Nesovic

1 Executive Summary

This paper addresses an urgent problem that will only grow if not treated. Disinformation causes disruptions in society, especially in the context of elections and emergencies. With past experiences of foreign interference in campaign periods, the COVID-19 pandemic, and most recently, Russia’s war in Ukraine, measures to deal with the issue are high on the agenda of many member state governments. This report looks at some of the policy examples that aim to tackle this problem. We briefly describe the EU approach to disinformation, and, as a next step, we zoom in on nine EU member states and four non-EU countries in the Balkans, some of which held elections in the past years or introduced regulations related to disinformation that are worth looking into. The problem of disinformation is typically regulated by non-legislative methods, though a handful of countries have tried to use a legal approach. Some of the measures are still controversial, mainly because they might affect the freedom of expression. The countries registering the lowest risk levels in the Media Pluralism Monitor (defined below) are relying on media literacy efforts, but in the context of coordinated disinformation campaigns, media literacy campaigns cannot work as a standalone solution. Moreover, there is a question as to whether national policies complement a Europe-wide approach to combating disinformation.

2 Introduction

Disinformation is understood as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the population, and may cause public harm (as defined by the European Commission’s Communication on tackling



online disinformation). With the increase of internet use, it has become increasingly hard for audiences to determine what information they can trust. Disinformation causes disruptions in society—especially in the context of elections. Vulnerable parts of the population are disproportionately targeted. It has been pointed out in many cases that disinformation is ‘gendered’ (EU DisinfoLab, 2021 and Sessa, 2022); the German federal election in 2021, for example, revealed that female candidates were targeted more often by disinformation campaigns than were males (Wilfore, 2021). This report looks at some of the policy examples in the European Union and the neighbourhood that aim to tackle the problems associated with disinformation (and to some extent, misinformation as well).

In our second assessment and overview¹, we relied on the findings of the latest two iterations of the Media Pluralism Monitor (MPM2021 and MPM2022).² The Media Pluralism Monitor assesses the risks to media pluralism in EU member states and candidates. In addition, we looked at reports by the European Regulators Group for Audiovisual Media Services (ERGA) and other authoritative sources related to disinformation policies in the EU or member states, such as reports prepared by the European Parliament think tank, the Organization for Security and Cooperation in Europe and national authorities.

While the original intent of this deliverable was to assess laws and policies in relation to elections, the COVID-19 pandemic and the ensuing ‘infodemic’, as well as the war in Ukraine provided additional challenges and triggers for disinformation-related policymaking that cannot be disregarded in the analysis.

As a next step, we zoomed in on a set of EU member states and neighbouring countries, some of which held elections in the past year or introduced regulations related to disinformation that are worth assessing. We chose the countries based on availability of data, thus some countries are not included in this report; these member states should be assessed in future reports, either

¹ For the first report, see EDMO (2021): Policies to tackle disinformation in EU member states. <https://edmo.eu/wp-content/uploads/2021/12/Policies-to-tackle-disinformation-in-EU-member-states-during-elections-Report.pdf>

² We would like to thank the quoted experts and the MPM country teams, especially those of Bulgaria, Estonia, Finland, France, Germany, Hungary, Portugal, Montenegro, the Republic of North Macedonia, Slovakia, Serbia and Slovenia. Their work on the MPM data collection has provided us with invaluable insights related to disinformation and related policymaking efforts in the respective countries. In addition, Stanislav Matejka of the Slovak Council for Broadcasting and Retransmission has helped us better understand the regulatory situation in Slovakia.





by EDMO, the EDMO Hubs or by other relevant stakeholders, including research teams interested in policies to tackle disinformation. This assessment focuses mainly on developments that took place prior to April 2022.



3 The assessment of risks related to disinformation

3.1 Short overview of the European responses

To foster a pan-European response to disinformation, in January 2018, the European Commission established the High Level Expert Group on Fake News (later renamed High Level Expert Group on Fake News and Online Disinformation and hereafter referred to as the Expert Group) made up of industry representatives, civil society, policy makers and scholars, and aimed at providing advice on policy initiatives to tackle the problems of online disinformation on the European level. It produced a report in March of the same year, which recommended a multidimensional approach to increasing the transparency of online news, the promotion of media literacy, the development of tools to empower users, to safeguard the diversity and sustainability of the news ecosystem in Europe as well as to promote research on the issue of disinformation.

In its final report, the Expert Group also recommended that the term ‘fake news’ be avoided as it is too broad and has been often misused by populist politicians for the defamation of news media that are critical of their activities (EC Report, 2018: 10). Instead, the report aligns with the widely-accepted typology of Claire Wardle and Hossein Derakhshan (2018) that differentiates between three key forms of information disorders: misinformation (when the information is not true, but it is not created and shared with the intent of doing harm), disinformation (when the untrue content was created and shared with the intent of doing harm) and malinformation (when the information is factually true, but is shared in a way that it can cause harm). Ahead of the 2019 European elections, the EU sponsored a ‘European approach’ to tackle disinformation. This led to the signing of the Code of Practice on Disinformation (CoP), the first major initiative developed at EU level to fight disinformation, which followed the Expert Group’s recommendations and encouraged online platforms, among others, to ensure the transparency of political advertising and restrict the automated spread of disinformation in the EU. In its text, disinformation is understood as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm. The text adds that deceptive content is disseminated either for economic gain (monetisation) or with the intent of deceiving the public. It also emphasises the component of ‘public harm’ as a ‘threat to democratic



political and policymaking processes as well as [to] public goods such as the protection of EU citizens' health, the environment or security'.

The Code of Practice of 2018 (CoP) was a relevant step in defining a policy against disinformation, as its signatories have committed to obligations that currently are not required from them by law; its impact was nevertheless limited. Problems could be traced back, first of all, to the fact that the CoP did not provide detailed practical guidance for its signatories. Terms used in the commitments can be either misinterpreted, or may provide grounds for online platforms to selectively comply with their obligations. Moreover, the CoP relied on self-reporting and statements of platforms cannot always be verified. There was an absence of standards for its evaluation and for reporting, lack of oversight on compliance, lack of sanctions for non-compliance, and lack of data against which to check the statements and reports created by platforms themselves.

The shortcomings were well-known on the European level. With the 2020 Democracy Action Plan, the European Commission started steering the efforts to turn the Code of Practice on Disinformation into a co-regulatory framework, which introduces obligations and requirements for accountability on online platforms. While the CoP's main focus is on disinformation, the Commission's guidance on strengthening the CoP emphasises the need to cover some forms of misinformation³ as well, in cases when they risk causing public harm. This extension of the CoP's approach has been criticised for posing threats to freedom of expression and information pluralism (Nenadić, 2021). On 16 June 2022, the new Code of Practice on Disinformation was published (European Commission, 2022) with the aim of correcting some of the earlier described problems. Apart from online platforms and trade associations, the 34 signatories included fact-checkers, civil society, research organisations and companies offering services to identify disinformation. The new Code included 44 commitments in nine areas. To overcome some of the weaknesses of the earlier Code, the 2022 Code of Practice puts a greater emphasis on key performance indicators (called qualitative reporting elements and service level indicators) and monitoring mechanisms. The European Platform of Regulatory Authorities notes that it still has to be seen whether this Code can become a game changer: 'This new Code invites online players to become a driving force in the understanding of and the fight against

³ It uses the definition of the European Democracy Action Plan: 'misinformation is false or misleading content shared without harmful intent though the effects can be still harmful, e.g. when people share false information with friends and family in good faith.'

disinformation. It remains to be seen if signatories will play their full part and respect their commitments. They have six months to implement these measures' (EPRA, 2022b).

In addition, the Digital Services Act (DSA) proposal aims to establish a powerful framework for transparency and clear accountability, which enables democratic oversight of online platforms, especially those referred to as 'very large online platforms' such as Facebook or Google. Its Articles 26 and 27 describe the obligations of online platforms to identify and mitigate systemic risks, such as disinformation, while Article 36 emphasises the need for a code of conduct for online advertising. Moreover, the biggest online platforms will undergo a yearly audit on their own expenses. Still, the disinformation-related measures in the DSA fall into the category of self- and co-regulation. The Preamble of the Strengthened Code of Practice acknowledges that the actions under the Code will complement and be aligned with regulatory requirements and objectives of the DSA, once it enters into force. In the intentions of the Signatories, the Code of Practice 'aims to become a Code of Conduct under Article 35 of the DSA' regarding very large online platforms.

3.2 Policies to tackle disinformation in the context of Russia's invasion of Ukraine

On 24 February 2022, Russia invaded Ukraine. The war has triggered a new wave of disinformation that spread across EU member states. To mitigate its impact, European Commission President Ursula von der Leyen announced on 27 February that the two Russian state-connected news media *RT* (formerly Russia Today) and *Sputnik*, that are available in some of the languages spoken in the EU, would be banned in the EU. The sanction was published in the Official Journal on 2 March, in the form of a Council Decision (CFSP) 2022/351 of 1 March 2022 amending Decision 2014/512/CFSP, integrated in the Council regulation (EU) 2022/350 of 1 March 2022 amending Regulation (EU) No 833/2014. (The ban, that focuses not just on online, but also broadcast disinformation, is described in length in another research paper written by EDMO's Task 5 – the next few paragraphs are to a large extent excerpts of that document.) The legal basis of the regulation is Art. 215 TFUE under EU's external action and the common foreign and security policy (CFSP).



The ban outlined in the Council decision and regulation means a discontinuation of transmission and distribution through satellite and cable, as well as the blocking of content on ‘IP-TV, internet service providers, internet video-sharing platforms or applications, whether new or pre-installed’ of the operators *RT* and *Sputnik*. The broadcasting licence or authorisation of *RT* and *Sputnik* are suspended and circumvention of these measures is prohibited. The ban has found immediate implementation across the EU by all media authorities, institutions and operators involved in its implementation. Online platforms, such as Facebook and Tiktok, have pledged to block the pages of the two outlets and on 2 March, the Luxembourg-based satellite operator SES (ASTRA) switched off the distribution of *RT* (Clover, 2022). The sixth package of sanctions, passed on 3 June 2022, included three new Russian-origin media outlets: thereby the distribution of *Rossiia RTR/RTR Planeta*, *Rossiia 24/Russia 24* and *TV Centre International* was also blocked in the EU (EPRA, 2022d).

This is not the first measure against broadcasters originating in Russia. In the past years, the Audiovisual Media Services Directive (AVMSD) had already effectively limited Russian broadcasting, by suspending transmitting programmes that incite hatred, as seen in the case of Latvia and *Rossiia RTR* (European Commission, 2019). In a 2021 opinion, ERGA found that the Latvian National Electronic Mass Media Council’s decision No. 68/1-2 on restricting the retransmission of *Rossiia RTR* in the country’s territory for 12 months was substantiated and compatible with the AVMSD; the service provider had repeatedly infringed the material provision of Art. 6(1) of the Directive in a way that, in the specific context of a former member of the Soviet Union with a significant ethnic Russian population, would ‘aggravate tensions impeding a peaceful coexistence of sovereign nations and ethnicities’. In addition, the opinion also mentions that other prohibitions have been employed, both in Latvia and Lithuania. In the context of the war in Ukraine, the regulators in the Baltic countries and Poland acted even a few days before (EPRA, 2022a) the Council regulation, and independently from it, by suspending the retransmission of a number of other Russian-origin television programmes on the grounds of threats to national security or in application of Art. 3.3 of the AVMSD. This states that a member state can limit freedom of reception and retransmission when an audiovisual media service provided under the jurisdiction of another state prejudices or presents a serious and grave risk of prejudice to public security, including the safeguarding of national security and defence.



4 Review of the country-level responses to disinformation

The Media Pluralism Monitor 2022 (focusing on developments of the year 2022) reveals that the risk associated with the sub-indicator ‘Protection against disinformation’ has decreased from 65% to 59% (medium risk) for the EU and candidate countries covered. Still, the impact of disinformation is assessed as causing high risks for society in 15 countries (Austria, Bulgaria, the Czech Republic, Germany, Greece, Hungary, Latvia, Luxembourg, the Republic of North Macedonia, Serbia, Slovakia, Slovenia, Romania, Spain, and Turkey). Only two country teams reported that the impact and spread of disinformation afforded no cause for concern: those of Belgium and Denmark.

The data collection also found that 15 of the 32 countries had introduced some form of regulatory framework to fight disinformation: Bulgaria, Cyprus, Estonia, Finland, France, Germany, Greece, Italy, Lithuania, Montenegro, the Netherlands, Poland, the Republic of North Macedonia, Slovakia, and Spain. However, existing frameworks were assessed as efficient in only three of these countries: Finland, Germany and Lithuania. At the same time, there were countries where the regulatory framework itself was seen as a source of risk (often to freedom of expression): Greece, Montenegro, the Republic of North Macedonia, Slovakia, Spain, and Turkey.

In its report titled *Notions of Disinformation and Related Concepts*, ERGA made a mapping of legislation and regulation related to disinformation in a set of EU member states. They found that the spread of disinformation online is typically regulated by non-legislative tools, but the criminal law covers, as a general rule, the deliberate dissemination of disinformation in case it poses a threat to peace or to public order (Croatia, Cyprus, the Czech Republic, Greece, Hungary, Slovakia, Romania). The study mentioned three statutory regulations that include a definition of disinformation: the Law on Misdemeanours against Public Order and Peace (Croatia) which sets out a fine or a prison term of up to 30 days for those who invent and distribute the kinds of disinformation that ‘disturbs the peace and quiet of citizens’, the Law on the Fight against the Manipulation of Information (France) which focuses on ‘false information’ in the context of elections, and the Law on Information to the Public (Lithuania) which prohibits the spread of disinformation that is ‘defamatory and offensive to a person or



that impairs his or her honour and dignity’. Instead of using the term disinformation, penal codes refer, among others, to the ‘publication of fake news, etc’ (Cyprus), ‘spreading of alarming news’ (Czech Republic), ‘scaremongering’ (Hungary), ‘giving false information’ (Romania) and ‘alarming messages of information’ (Slovakia) (ERGA Report, 2021).

4.1 Bulgaria

On 14 November 2021 Bulgaria voted both for president and for parliament (the latter poll took place for the third time in that year). The information environment in which the campaigns took place was less than optimal. A policy brief by the Center for the Study of Democracy found that the deterioration of media freedom and the rapid spread of disinformation caused severe problems for the population. Yet the government didn’t counter these with ‘credible public policy responses’ (CSD Policy Brief, 2021). Disinformation was especially widespread on social media (mainly Facebook), shared by far-right political actors, among other agents. Pre-election disinformation content dealt with mainly two major topics: first, COVID-19 and vaccines and secondly, the European Green Deal. One of the most popular pieces of disinformation accused opposition candidate Kiril Petkov (now prime minister) and the (reelected) President Rumen Radev with a conspiracy to build 27 laboratories in cooperation with the US-based company Amazon, in order to collect DNA information of vaccinated Bulgarians. There are signs that platform measures that work in other member states are not enforced in Bulgaria. A 2021 investigation of Kalina Bontcheva and Claire Pershan found that Bulgaria was ‘neglected by Facebook’s moderation efforts and failed by its policies’ and, as such, numerous narratives that were debunked in other EU countries were left unaddressed and unlabelled in Bulgaria (Bontcheva, 2021).

In Bulgaria, journalistic outlets are often complicit in the spread of disinformation. In 2021, the Center for the Study of Democracy published its study, ‘Countering Kremlin’s Media Influence in Europe’; the section on Bulgaria concludes that ‘the dissemination of Russian-sponsored anti-democratic messaging has been facilitated by a receptive Bulgarian media landscape, one in which reporting with a nationalist, anti-migrant, misogynist underlying theme is widespread’ (Filipova, 2021).

The report also highlighted that, at the same time,



initiatives driven by civil society actors have produced some concrete results, including the promotion and study of media literacy and pushback against politically motivated encroachments on freedom of speech. Civil society in Bulgaria has also been more effective in cooperating and exchanging knowledge with European and certain domestic governmental actors (Filipova, 2021).

However, according to Assistant Professor Ralitsa Kovacheva, a disinformation expert based at Sofia University interviewed by the Bulgarian country team for the 2022 Media Pluralism Monitor, these initiatives are insufficient. ‘At the moment, they are rather isolated and do not reach a wide audience,’ she said. Kovacheva also reflects on the politicisation of policies:

Measures to counter disinformation are now persistently branded as ‘liberal propaganda’, including by fellow journalists. This does not doom the effort to failure, but it is a serious impediment to its widespread acceptance as a legitimate practice for producing quality journalism. Fact-checking is presented as the liberal response to disinformation and propaganda. This is a serious problem. There are journalists who publicly express such opinions, and this, at a certain point, begins to promote the idea that there is no such thing as facts, but there are liberal facts, conservative facts, alternative facts, and so on.

The COVID-19 pandemic has led to some controversial attempts to pass laws on disinformation. In 2020, the Parliament tried unsuccessfully to introduce an emergency law, as well as to change the Criminal Code and the Radio and Television Act to criminalise the spread of disinformation and misinformation (punishable with fines of up to EUR 1,000 or imprisonment of up to three years). The OSCE (Organization for Security and Co-operation in Europe) Representative on Freedom of the Media at the time, Harlem Désir, expressed concerns about the amendments which he suggested would give the Bulgarian broadcasting regulator powers to suspend websites that distribute ‘internet misinformation’. While the first attempt to pass an emergency law only mentioned ‘fake news’ related to the pandemic, the second attempt aimed at prohibiting all forms of false information online. The OSCE (2020) found it especially worrying that no criteria were defined to determine what constitutes disinformation or misinformation.



Estonia was one of the first EU countries subjected to foreign disinformation campaigns. In Estonia, disinformation originates mainly from Russia and aims at the country's large Russian-speaking minority (Teperik, 2022). In the context of the COVID-19 pandemic, for example, lower vaccination rates were registered in this community than in the general population – in part, due to narratives that emphasise the superiority of the Sputnik vaccine (which is not available in Estonia and not recognised by the health authorities of most EU countries) over the Pfizer vaccine. Russian-speaking communities are often isolated from the Estonian-speaking part of society. In order to remedy this, Estonian authorities aim to organise programmes (such as cooking classes) that help communities connect with each other and exchange information (Ostrovsky, 2022).

One of the early efforts of the country was to include media literacy in public school curricula; students in 10th grade are required to participate in a 35-hour 'media and influence' training (Yee, 2022). A report by the *BBC* describes the measures as follows:

In Estonian elementary and middle schools, there is no specific course on media literacy. Rather, the concepts are integrated into other subjects. For example, maths teachers might dig into statistics, which are easily misunderstood or manipulated. Art classes analyse images and how advertisements or certain media depictions make viewers perceive things. Social studies classes could focus on war propaganda.

In kindergarten, children might play with toys with knobs that direct an insect to do different things, explains [Siim Kumpas, former strategic communication adviser to Estonia's government, and policy officer at the European External Action Service]. He points out this is an early lesson in the basics of coding and the concept of algorithms.

Young children learn how digital content is created, as well as how to use the internet safely, adds Britt Järvet, a strategic planning adviser at Estonia's ministry of education.

Estonia's national educational standards give schools goals and study outcomes to reach. Schools themselves decide how to reach the goals, so teachers have flexibility when choosing study materials and methods.

But Estonia's mandatory high school 'media and influence' course focuses on the role of media and journalism in society, including how social media works, how bots and trolls function and how to protect against them. Students learn about fact versus opinion, reliable versus doubtful sources, and other tools of critical analysis.

In addition to the mandatory class, high schools usually offer additional elective classes about media. In many such courses, students make media themselves, says Liisa Koik, a high school media literacy teacher in Lääne, Estonia. This, she says, helps them learn how content is created whether videos, photos, social media posts, blogs – and how it can be designed to persuade or manipulate.

[...]

At the university level, [Maria Murumaa-Mengel, lecturer at University of Tartu and a former high school media literacy teacher for 15 years,] designed an elective media literacy course at the University of Tartu that educates students about how journalists work in mainstream media, and teaches skills need to independently seek additional information that might be needed to verify facts.



On a broad level, Järvet says that the spectrum of media literacy education aims to enable a culture of critical analysis and help people understand ‘complicated and hidden messages’, whether on TV, in movies, music or the internet.

There is no one way to teach media literacy. But Estonia's government mandates that the country's teacher-training universities teach elements of ‘digital competencies’ as part of their courses. More plans are in the works for training teachers specifically on media and information literacy.

Aside from literacy measures, by 2006, Estonia had created the Computer Emergency Response Team to react to digital security threats. Since 2015, the so-called ‘Baltic elves’ have been monitoring the web for Russian disinformation. The EU’s East StratCom Task Force was set up that year to issue rapid alerts to the public in case of potential disinformation campaigns (EU DisinfoLab, nd). Part of the State Electoral Office’s mandate is to counter disinformation through its interagency working group called the election communications task force, which is in charge of any messaging related to elections. A key actor in the fight against disinformation is the Government Office’s department of strategic communication. The Government Office supports the Electoral Office, among others, by establishing a working relation with online platforms, monitoring both the Estonian and Russian social media sphere, writing a guide for political parties, briefing journalists on foreign information interference and mapping risks related to the electoral process (in cooperation with the State Electoral Office and the Information System Authority). In addition, the Tallinn-based NATO Cooperative Cyber Defence Centre of Excellence (NATO CCDCOE) is a NATO-accredited knowledge hub, think-tank and training facility.

4.3 Finland

To date, disinformation is not considered a major threat to the well-being of Finnish society. The countermeasures against disinformation are built around media literacy education and self-regulatory measures for fact-based reporting in the news media. The National Audiovisual Institute (abbreviated KAVI, from its Finnish name) is tasked with, the promotion of media literacy, among other things. The European Audiovisual Observatory’s report on EU countries’ media literacy initiatives found that ‘[t]he field of media literacy in Finland is wide and active, with many national institutes, as well as municipalities and regional and local actors involved’. The report also mentions that a ‘significant characteristic of the field of Finnish media literacy



is the multitude of actors and projects that are partly or fully funded by the ministries or other public authorities’.

Assessments suggest that these measures have so far been effective (Mackintosh and Kiernan, 2019). In an email to the authors, Dr. Miina Kaarkoski, a disinformation researcher at the National Defence University, explained: ‘I think Finland has not been very vulnerable to disinformation thus far, since the Finnish people and politics have been quite consensual. We haven’t experienced similar societal tensions between different groups than what is seen for example in Sweden. Therefore, in general, possibilities of causing confusion and disorder in the Finnish society through disinformation campaigns are fewer than those in some other countries where divisions in society are more visible and deeper. This might be one of the central reasons why the majority of the Finnish authorities have only recently begun to recognize the meaning and potential risks of disinformation.’ The Government’s Defence Report points out that information defence has become a more critical part of national defence. It mentions that ‘the volume of externally directed and other malicious information, and the ways to disseminate it, is increasing’, and as such ‘an effective information defence requires that the Defence Forces have, for example, the necessary digital tools for monitoring the information environment and for initiating defensive measures when necessary’. (Finnish Government, 2021). Dr. Kaarkosi added: ‘Currently, especially the war in Ukraine and the Finnish NATO-application have increased the awareness of disinformation, and authorities and administration have more resources to develop expertise and strategy to identify and counter disinformation.’

4.4 France

France held its presidential election in April 2022 (the first round on 10 April and the run-off on 24 April) which led to the reelection of President Emmanuel Macron. The results of the election were of great interest to the disinformation policy community; as in 2017, the news media reported Russian interference and the spread of disinformation in the context of the presidential election. Consequently, France had passed a law in 2018 to fight disinformation during election campaigns. The 22 December 2018 law (No. 2018-1202) for ‘the fight against information manipulation’ invites online platforms and other media (Art. 15) to develop



measures aimed at fighting against ‘the dissemination of fake news likely to disturb the peace’ or to alter the ‘sincerity of elections’ (Art. 11). It also addresses the transparency of their algorithms (art. 14). This law makes it possible to suspend the activities of foreign state-controlled broadcasters in France, in case they are found distributing disinformation. It establishes a civil procedure by which judges can order online service providers to block specific content prior to elections and imposes transparency requirements on online platforms (we have described the measure in the report titled ‘Policies to tackle disinformation in EU MS during elections - Report, 2021’. From here on called ‘Policy Report’⁴).

Following the 25 October 2021 law (chap. 1 & 2), a new regulatory authority has been created in France: the Conseil Supérieur de l'Audiovisuel (CSA) merged in January 2022 with the HADOPI (Haute Autorité pour la Diffusion des Oeuvres et la Protection des Droits sur l'Internet, the authority in charge of protecting author rights on the Internet) to constitute a new entity, the ARCOM (Audiovisual and Digital Communication Regulation Authority). ‘Its nine members are appointed by decree on the basis of economic, legal or technical expertise or professional experience in the field of communication, in particular the audiovisual sector, or electronic communications. Its president is appointed by the president of the Republic [of France].’ (Blocman, 2021). The competences of the merged institution have been extended to include issues relating to disinformation, as well as a regular dialogue with online platforms on their actions against disinformation (but it does not list any binding measures).

The government set up a commission called ‘The Enlightenment in the digital era’ (‘Les Lumières à l’ère numérique’) to assess the state of disinformation. The group’s report (2021) looks at cognitive bias, the role of algorithms and the monetisation of disinformation. Building on this report, French President Emmanuel Macron addressed the issue of disinformation in his new year speech in 2022 (Kayali, 2022). ‘Online platforms, influencers, and also citizens who sometimes take a considerable place in the public debate precisely through these new platforms [...] must have a framework of responsibility that is yet to be built’, he said. He also emphasised that the same rules need to apply to foreign media outlets broadcasting in the country (alluding to RT and Sputnik). The president also mentioned the creation of a ‘peer review-likeself

⁴ Available at <https://edmo.eu/reports/>



regulation' system whereby the press industry identifies "reliable media".' However, the timing of the speech in January did not allow for any of the plans to materialise before the election.

4.5 Germany

To deal with the challenges of disinformation, one of the first national policies formulated in an EU member state was the so-called Network Enforcement Act (NetzDG, also referred to as the Facebook Act) in 2017. It required social media providers to proactively remove certain kinds of problematic content, based on the criminal code provisions. This requirement was criticised early on by civil society for possibly damaging freedom of expression and freedom of the press. From the catalogue of crimes that fall under the scope of NetzDG only some are linked to disinformation, nevertheless, the new Media Services Agreement (MStV) introduced new tools to fight disinformation.

Section 19 (1) of the MStV has extended the existing journalistic due diligence obligations to commercial websites that publish news or political information from 2021. In their assessment of disinformation policies between 2019 and the first month of 2021, Bayer et al. (2021) mentioned that state media authorities have, in accordance with the MStV, issued 13 warnings against websites that published disinformation, at least one of which was associated with the far-right AfD (Alternative for Germany) party. The MStV (Sections 18 (3) and 22 (1)) also prescribe that political, ideological, and religious advertising and content created by bots should be marked (Sections 18 (3), 22 (1) sentence 3 MStV). How this legal development impacted the German federal election on 26 September 2021 was not yet assessed at the time of writing. (We deal with the German election context in length in the previous Policy Report). In the context of the 2021 national election, a report by Righetti et al. (2022) found evidence of several coordinated networks that were posting the same links almost simultaneously. 'Coordinated Link Sharing Activity' was utilised by political parties and news media as well, but it was employed more commonly among far-right actors and purveyors of disinformation. The report also found that Russian disinformation sites like RT played a great role in spreading disinformation - e.g. publishing made-up stories about the effects and side-effects of the Pfizer or Johnson & Johnson vaccines. RT links were often reshared by disinformation profiles pretending to be news media. The report also found signs of an extensive use of microtargeting



(mainly by political parties during the election campaign) to specific demographic groups (women or youth), but the authors were unable to draw clear conclusions related to targeting strategies, as the data provided by Meta (the US technology company, formally known as Facebook) did not allow this (while at the same time the platform was providing sufficient information on ad spending, impressions and the demographics of ad viewers).

An exchange of experiences between the state media authorities responsible for monitoring the measures made clear that some procedures of the MStV had been carried out, and the authorities had some experiences to share. As a negative experience, the authorities mention that purveyors of disinformation often use the notices against them to strengthen the loyalty of their audiences; in practice, it is not always possible to apply the new norms. On a rather positive note, they add that the instrument has empowered media authorities to take on the largest players, and the existing experiences can be used to address weaknesses and to strengthen the measures against disinformation (Dreyer et al, 2021).

As messenger services – especially Telegram – are frequently used to spread disinformation, and many operators do not comply with applicable German law, German lawmakers have discussed stricter rules. In an interview with the weekly *Die Zeit*, Interior Minister Nancy Faeser didn't rule out a ban of Telegram in Germany. 'A shutdown would be grave and clearly a last resort. All other options must be exhausted first' (Nasr, 2022). Later, on 12 February 2022, *Deutsche Welle* reported that, on its own initiative, Telegram had closed 64 accounts on its own service that were identified as sources of disinformation and conspiracy theories.

It is 'the first time' Telegram has taken action against the spread of 'hate and incitement' on its platform in Germany, [the daily *Süddeutsche Zeitung*] noted. The closure of the accounts came after pressure from the Interior Ministry and the Federal Criminal Police Office (BKA), who entered into discussions with the heads of the app in an effort to flag issues with several channels. (Deutsche Welle, 2022)

Already prior to Russia's intervention in Ukraine, on 2 February 2022, the German Commission for Authorisation and Supervision (ZAK) sanctioned RT's German edition for failing to possess the correct licence for broadcasting in Germany (the broadcaster had a Serbian licence and never applied for a German one). The statement said '[t]he organisation and distribution of the TV program via live stream on the internet, via the mobile and smart TV app "RT News" and via satellite must be discontinued' (Die Medienanstalten, 2022).



4.6 Hungary

Bayer et al. (2021:46) pointed out that in Hungary, the main disseminator of disinformation is the government-friendly media, which regularly publishes fabricated reports, with the aim of strengthening popular support of the government and discrediting opposition parties (Szicherle and Krekó, 2021). Relevant disinformation policies were not introduced – the 2020 so-called ‘Authorisation Act’, a controversial measure that extended the penal code’s existing category of ‘scaremongering’ was discussed in our previous report. In September and October 2021, the Hungarian opposition parties held primary elections. During that time, the public service media, the state news agency and the government-friendly private outlets overwhelmingly avoided reporting about the primaries, except for a few speculative articles about former Prime Minister Ferenc Gyurcsány’s role as a puppet master behind the scenes and about the possibly inflated numbers of voters participating in the primaries (Szopkó, 2021).

The national election took place on 3 April 2022. The government did not introduce any significant policies to fight disinformation – neither in the context of the election, nor in relation to the war in Ukraine – while, at the same time, the government-aligned media channels reportedly embraced the fabricated narratives originating in Russian state media (Zöldi, Neuberger, Bayer, and Szebeni, 2022). In the context of the war, both the narrative of government members and news outlets included fabricated statements that the Hungarian opposition was aiming for an involvement in the war in Ukraine (Balint, 2022), while Ukrainian President Volodymyr Zelenskyy was trying to influence the Hungarian election (Baker, 2022).

A new fact-checking site called *Lakmusz.hu* was launched in the country with the financial support of EDMO and the European Commission, relying on the expertise of the French news agency *Agence France Presse (AFP)*. *Lakmusz.hu* has fact-checked a number of statements of opposition party candidates and the government-aligned media that is seen as the source of most disinformation in the country, but it also dissected a controversial statement by the opposition’s candidate for prime minister (Diószegi-Horváth, 2022). In addition, the Hungarian public service media has launched its own fact-checking service (*Hirado.hu*, Fake news monitor), yet is seen to be providing politically-motivated commentary (Diószegi-Horváth, 2022). According to news media reports, the broadcast service provider Tarr Kft. only



removed *RTR Planeta* – a Russian outlet covered by EU sanctions – from its offerings in late June, following the media industry website *Media1.hu*'s inquiries to the media regulator (Szalay, 2022).

4.7 Portugal

Ahead of the 2019 European parliamentary elections, the Portuguese parliament introduced possible legislation in the panel 'Tackling misinformation to defend democracy'. The law was proposed by the Socialist Party with the aim of guaranteeing the safety of elections through cybersecurity measures. (EU DisinfoLab, nd). However, for a long time, disinformation and misinformation were mainly addressed by the country's initiatives on media literacy.

In 2021, a legal framework for digital citizenship was discussed in the national parliament and approved. The Portuguese Frame for the Human Rights in the Digital Era ('Carta Portuguesa de Direitos Humanos na Era Digital') was published in *Diário da República* on 17th May 2021. The most controversial part of the legislation is Article 6, which is related to the right to be protected against disinformation. Critics pointed out that the definition of disinformation and the power of the communication regulatory agency (ERC) to evaluate potential disinformation and to sanction its sources or purveyors may lead to restrictions on freedom of expression. Public bodies (such as the regulatory body of journalists, CCPJ) asked the Constitutional Court to assess the constitutionality of Article 6.

4.8 Slovakia

Slovakia is currently in the process of launching a complex project to tackle different aspects of disinformation. The aim is to increase the analytical and communication capacities of relevant departments. The first important document was the Concept for the Slovak Republic countering hybrid threats from the year 2018. The government formed in 2020 reiterated this aim in its Programme Declaration for the Period 2020-2024. A new Security Strategy the same year described the ability of society to respond to hybrid threats, including disinformation, as one of the key security priorities of the state (Kandřík, 2020). However, action lagged until the second year of the pandemic.



Disinformation related to the COVID-19 pandemic has caused numerous challenges to the country (German Sirotnikova, 2020), some commentators and experts even blame disinformation for the country's low vaccination rate. The situation reached a point at which Slovakia's healthcare surveillance authority launched an investigation into prominent doctors for spreading dangerous COVID-19 related disinformation; medical professionals now risk losing their medical licences (Zmušková, 2021).

According to Tomáš Kriššák, an information security expert working for Gerulata Technologies who was interviewed by the Slovak country team of the MPM, plus activists, NGOs and private companies were leading the fight against disinformation. 'Slovakia was responding to a deepening crisis of disinformation only in attempts of a handful of activists and NGOs, there was almost no activity coming from the state but that has recently changed [...]. The Ministry of Health has managed to pull off a well-designed and successful information campaign on social media; interestingly, the whole success was a work of several talented individuals rather than strategic conception coming from the ministry. All other state departments are failing to achieve a similar level of critical or strategic communication [...]' In the first and second wave of the pandemic the Facebook accounts of the Slovak Police (Polícia Slovenskej republiky and Hoaxy a podvody - Polícia SR, n.d.), were widely regarded as the most effective official measures to counter disinformation and misinformation.

The Action Plan for Coordination of Countering Hybrid Threats and the Spread of Disinformation was passed by the government. The aim of this interdepartmental document is to identify problems and propose solutions. Its text deals with disinformation, the integrity of elections protection, building resilience in the population and protection against influence operations of foreign powers (MOSR, 2021). A department for hybrid threats and resilience building was established in the Ministry of Foreign and European affairs of the Slovak Republic; and another department dedicated to hybrid threats and disinformation was established within the structure of the National Security Agency. The COVID-19 related EU recovery plan was used in part to set up a centre to combat hybrid threats (through AI-driven detection and assessment of hoaxes and disinformation) under the Ministry of the Interior (Yar, 2021).

In December 2021, the Ministry of Justice proposed a draft law (as part of a larger Penal Code amendment), according to which people spreading false information could face a prison



sentence. The proposed legislation § 361a states ‘[a]ny person who, through negligence, repeatedly disseminates false information which is liable to create serious anxiety among at least part of the public, threaten lives or public health or influence the public when making decisions on important questions of general interest, shall be punished by a prison sentence of up to one year.’ In September 2022, the proposal was dropped. The new draft of the amended Penal Code did not include the controversial element.

Reporters Without Borders criticised this measure aimed at fighting disinformation. It points out that some of the elements in the crime’s definition, such as ‘creating anxiety’ and ‘influencing the public’, are especially vague. At the same time, the penalty would be extremely severe. The NGO argued that ‘the proposed law could open the way to arbitrary prosecutions of professional journalists and encourage self-censorship, thereby endangering press freedom. It could also be used by authoritarian political parties to gag journalists and resembles the laws adopted in Hungary and Greece that RSF has condemned as draconian’ (Reporters Without Borders, 2021). (The Hungarian and Greek laws were described in our previous Policy Report.)

A new law was passed on media services (264/2022), as a transposition of the Audiovisual Media Services Directive (SLOV-Lex, 2022). The most significant change it proposes would be the regulation of video-sharing platforms, as foreseen by the Directive. If the platform operator does not remove harmful content or prevent its further dissemination, it may receive a fine of between 2,500 euros and 100,000 euros. At the same time, however, operators of video-sharing platforms would not have editorial responsibility, such as television. Instead, they would have to ensure that users can report inappropriate content and then be informed of the effect of their reporting.

In the context of the war in Ukraine, Slovakia was among the first to respond. Already prior to the European Council resolution, the Council for Broadcasting and Retransmission of the Slovak Republic (CBR) declared its support for operators that decided to stop broadcasting Russian television programmes. A communication by EPRA (European Platform of Regulatory Authorities) describes the Slovak authority’s reaction as follows: ‘While legal processes to suspend retransmission are lengthy and therefore inappropriate in the current situation, they offer to assist indecisive broadcasters with legal interpretations and detailed information about actions taken by NRAs in other Member States’ (EPRA, 2022a). Following authorisation by the National Security Authority (NBÚ), in the spring of 2022, Slovak



authorities blocked a number of local disinformation websites. However, this was just a temporary, one-off measure, with limited effect, as some of the banned websites re-registered from .sk to other non-regulated domains. At the time of writing, the Slovak parliament is working on a new law that would regulate the ban of websites that regularly spread disinformation (focusing on the conditions for suspension, defining who is responsible, and providing the possibility to challenge the decision at court, etc.) (see Slovak Spectator, 2022).

4.9 Slovenia

Disinformation narratives in Slovenia may originate from, or have close ties to the government, which reduces the chances of successfully solving this problem. An interesting example is *Nova24TV* (News24TV), a Slovenian online platform and TV outlet that is seen as spreading hate speech and far-right propaganda. This media outlet published advertisements of many companies and institutions in Slovenia, including national telecom provider, the post office, and the ministry of defence. A non-governmental organisation, *Državljan D* (Citizen D), reached out to the Slovenian authorities in order to investigate the reasons for such decisions and to call for changes. ‘Propaganda outlets such as News24TV also normalise the alt-right movement and promote their ideas. They serve as an attack platform for a political party and offer a unique way of channelling public money into private pockets via advertising contracts. Since September 2018 we have tried to get decision-makers to address the issue of public funding of propaganda and hate speech via advertising contracts.’ (Savič, 2021). Aside from a few officials commenting that a rethink the advertising campaigns of state-owned companies is needed, no specific actions were taken.

The parliamentary elections took place in Slovenia on 24 April. Disinformation narratives were increasingly spread during the pre-election campaign and during the political debates of the candidates. The disinformation that circulated in the media was mostly about the accomplishments of the candidates and their political parties, the omissions of their political opponents, the percentages of citizen support for certain political parties, as well as the current situation in the country, such as the employment rate, or the number of people emigrating from Slovenia (Oštro, 2022).



The Slovenian legislative framework does not include specific laws regarding disinformation, however, the Media Act and the Code of Journalism Ethics refer to related issues. Despite the undeveloped legislation, there are many initiatives and projects in Slovenia that strive to tackle disinformation and limit its negative impact. The two most active fact-checking platforms in Slovenia are *Razkrinkavanje.si* (The Unmasking), which is a part of the *Oštro* portal, and *Ne/Ja – Razbijalka mitov* (No/Yes – Myth Breaker), operated by the *Slovenian Press Agency*.

Razkrinkavanje.si is a signatory of the Code of Principles of the International Fact-Checking Network, and a member of SEE Check, an organisation that brings together fact-checking platforms from five South-East Europe countries. Having in mind this year's parliamentary elections, there was a need for increased monitoring of disinformation. The *Oštro* portal dedicated specific parts of the webpage to this issue, under the titles Super-Election Year and The Parliamentarian. *Ne/Ja – Razbijalka mitov* devotes a section of its website to the instructions for citizens on how to verify information themselves. They also share 'fake news' recognition tools that can help find and identify correct information (*Ne/Ja – Razbijalka mitov*, 2021).

A project on *PopTV*, under the title *Dejstva* (The Facts), was created in 2018 with the aim of verifying the facts during the parliamentary elections and further continued its work in the period of other elections, including the year 2022. The purpose was to check the information stated by the candidates, as well as the allegations made during the pre-election debates. To reduce different misperceptions that are created when certain claims are being made without context, the team of journalists would verify those pieces of information, clarify their background, and provide additional information (*Ne/Ja – Razbijalka mitov*, 2021). The online children's media *Časoris* provides education to children about the role of the media, distinguishing truth and lies, and getting properly informed of important news. The outlet organises media literacy workshops for primary and secondary school students and implements projects such as KidsTrustNews, Searching for the Truth in the World of Fake News, Stories of Children of the World, and Fake News Hunters. For instance, the project Fake News Hunters is composed of a series of YouTube and TikTok cartoon videos with children as main characters, which portray their adventures in recognizing credible and false news, opinions, satire and facts, etc. The editor of *Časoris* and creator of *Fake News Hunters*, Sonja Merljak Zdovc, points out that approximately a quarter of primary schools in Slovenia teach the subject



media education, but that the teachers are not entirely sure about what the curriculum should be (Ne/Ja – Razbijalka mitov, 2021).

4.10 Non-EU countries in the Western Balkans – Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia

As a region of post-war instability that is transitioning to democratic principles, the Western Balkans is particularly sensitive to disinformation. *Mapping Fake News and Disinformation in the Western Balkans and Identifying Ways to Effectively Counter Them* is a study requested by the European Parliament's Committee on Foreign Affairs. When exploring the background of the disinformation issue in this region, the authors suggest that ‘throughout the region, information disorder reflects social and political disorder, and appeals to identity are particularly potent – even when disjointed from facts – when politics fails to deliver material benefits. Ethnic and sectarian divisions thus provide easy fodder for arousing passions’. (Greene et al., 2021). The authors also underline that widespread corruption adds to the lack of trust between citizens and the government and further amplify the spread of disinformation.

The pre-election periods in this region are especially marked by disinformation. The campaigns of the political parties are largely based on representing the political opponents in a negative light, each accentuating its own advantages; this often includes spreading false or misleading information. The lack of media objectivity and their close ties to the political parties add to the impact of disinformation and lead to entirely contradictory information being transmitted by different media. There is also an increase in the number of anonymous news portals and social media pages that consistently share disinformation. The presidential and parliamentary elections took place in Serbia on 3 April 2022, and the election observation mission Crta (The Line) monitored the state of disinformation during that period. The mission found that the source of the majority of disinformation was Srpska Napredna Stranka (Serbian Progressive Party), the ruling party that won the elections once again. The observation mission reports that their disinformation narratives were mostly spread in their media statements and that the most common types of disinformation were deceiving content and misuse of facts, followed by unsubstantiated information (Istinomer, 2022). A similar situation developed in North Macedonia during the local elections in October 2021. Instead of the local needs of the citizens



and the responsibilities of the municipalities, the media discourse was filled with national-level topics, some of which are subjects of political debates for years. Disinformation was extensively shared in the topics of COVID-19, the population census, sex education in schools, about migrants from Afghanistan, the country's Citizenship Law, and the Prespa Agreement between Greece and North Macedonia (Civil Media, 2021).

The war in Ukraine brought insecurities and further disagreements to the Western Balkans region, due to the significant influence of both Russia and the EU in these countries. The situation was worsened by the spread of disinformation. Examples of disinformation content that caused strong reactions in the region include a photo of a crying child crossing the Ukrainian border all alone (the child was actually with his family), photos and videos of alleged acts of Ukrainian soldiers (that were in fact taken from other parts of the world or extracted from movies), photos of destroyed buildings in Ukraine (that were actually photos of buildings in other countries), false claims that Ukraine is attacking its own citizens in order to blame Russia, false claims that the Ukrainian army is using human shields for defence, as well as videos of Russian planes being taken down in Ukraine (that were in fact extracted from video games) (SEE Check, 2022). On 19 April, the Agency for Electronic Media of Montenegro decided to follow the recommendation of the EU Council resolution and suspended the broadcasting licences, permits and transmission and distribution arrangements of RT and Sputnik (EPRA, 2022c).

Bosnia and Herzegovina, Montenegro, North Macedonia and Serbia do not have a specific legal framework to deal with disinformation. However, each of these countries has codes or action plans about disinformation, or other related laws. The journalists' code of ethics underline the obligation of journalists to publish accurate, complete, objective and verified information without withholding essential information from the public. It is also noted that there should be a clear distinction between opinions, metaphor, irony, satire and facts. Several criminal laws emphasise the criminal offence of causing panic and disorder by sharing false and misleading information.

Although the legislation regarding disinformation is weak in these countries, there are numerous fact-checking platforms that strive to uncover disinformation and strengthen media and information literacy. SEE Check is an organisation consisting of six fact-checking platforms from five South-East Europe countries. The members are *Fake News Tragač* and





Raskrikavanje.rs from Serbia, *Raskrinkavanje.ba* from Bosnia and Herzegovina, *Raskrinkavanje.me* from Montenegro, alongside with *Razkrinkavanje.si* from Slovenia, and *Faktograf.hr* from Croatia. The International Fact-Checking Network of the *Poynter Institute* includes *Istinomer* from Serbia, *Istinomjer* and *Raskrinkavanje.ba* from Bosnia and Herzegovina, *Metamorphosis Foundation* from North Macedonia, and *Raskrinkavanje.me* from Montenegro. Additionally, fact-checking organisations from four Western Balkans countries joined Meta's Third-Party Fact Checking Programme. *Raskrinkavanje.ba*, *Raskrinkavanje.me*, *Metamorphosis Foundation's Truthmeter*, and *Istinomer* are now, along with 70 other organisations worldwide, cooperating with Meta on reducing the spread of disinformation in the online space.

The work of fact-checking platforms is made harder by the lack of cooperation with the media and the government, particularly because of the political bias of most of the main media outlets. After the beginning of collaboration with Meta, journalists working for fact-checking organisations are receiving threats more often and being accused of censorship (Dobrić, 2019).



5 Conclusions and Recommendations

Our overview of the EU and the country-level policies shows that the legal responses are still limited and controversial. The chilling effect of laws, especially in the context of the COVID-19 pandemic (but also with respect to safeguarding elections, such as in France), has been highlighted in our earlier report, but the Slovak government's attempt to change the country's penal code shows that the same concerns remain, even at times when Europe is easing its restrictions. Especially, when disinformation is addressed in the penal code, the definitions used by lawmakers are too broad, increasing the risk of a possible misuse of policies by authorities. At the same time, it has to be mentioned that, in most cases, the threats do not materialise.

In some country contexts, disinformation originates from official sources (such as in Hungary, but also in Poland) or political parties (Bulgaria) and may be distributed not just online, but also on broadcast media (including the public service outlets). In those cases, it is hard to expect that the governments will come up with credible policies. In these and other country cases, it is also visible that political or other local actors embrace the disinformation stemming from official Russian channels and incorporate it in their own narratives.

The Finnish and Estonian examples show that media literacy is a successful tool when it comes to increasing a society's resilience to disinformation and misinformation (albeit, as Goodman, 2021 highlights, it is hard to define best practices for cross-border research on media literacy), but it may not be enough, especially when it comes to coordinated disinformation attacks that threaten national security. These components are important on the EU level, but there are also a number of countries that have started to put a larger emphasis on regulating platforms (such as Germany and France) or to include disinformation in their national defence approaches (Finland and Slovakia). Institutions to analyse disinformation and coordinate responses have been created (such as in Slovakia) and regulatory authorities have been given additional powers to act on these issues. Media literacy and support for independent media (another important tool to strengthening resilience) need to be strengthened on the local and regional level as well; a national focus might divert attention from smaller communities targeted by malign actors.

In general, the assessment of the current cases leads us to reiterate the conclusions of the first policy report. It would be advised that, if countries decide to introduce regulatory measures or



self- and co-regulatory measures, make sure any policy is, first, in line with the rule of law. If a policy is established, it is reasonable that all the dominant online players (platforms) are covered by them. Platforms should be transparent regarding the way they limit the spread of disinformation, and based on what criteria. Platforms should be accountable and report, for instance to regulatory authorities. These authorities should be equipped to regularly monitor the activities of online platforms (including a focus on algorithmic transparency) and to ensure that platforms label activities of automated or misrepresented accounts. A well-functioning policy response also needs increased attention to political and issue-based advertising. Audiences should be informed at least about the persons who are behind a specific advertising. Political parties and other campaigners should be expected to keep detailed archives of their past campaign messages, while political platforms need to maintain extensive and accessible libraries of political advertising. In these endeavours information about microtargeting methods should feature prominently, as well as the description of audiences, the amounts spent and the reach of specific messages and the interactions they triggered.

While digital literacy projects exist all over the EU, it would be advisable to increase their reach and intensity. Incorporating digital literacy in school curricula is advocated. Following the COVID-19 pandemic, the crisis in Ukraine has shown once again that no member state is immune; both foreign and homegrown disinformation exist. While some of the state measures described might be suitable to mitigate the harms of disinformation, there is so far no indication that all member states would individually arm themselves with the best possible responses to disinformation. Instead, a Europe-wide response is needed; country measures would be complementary to this.



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