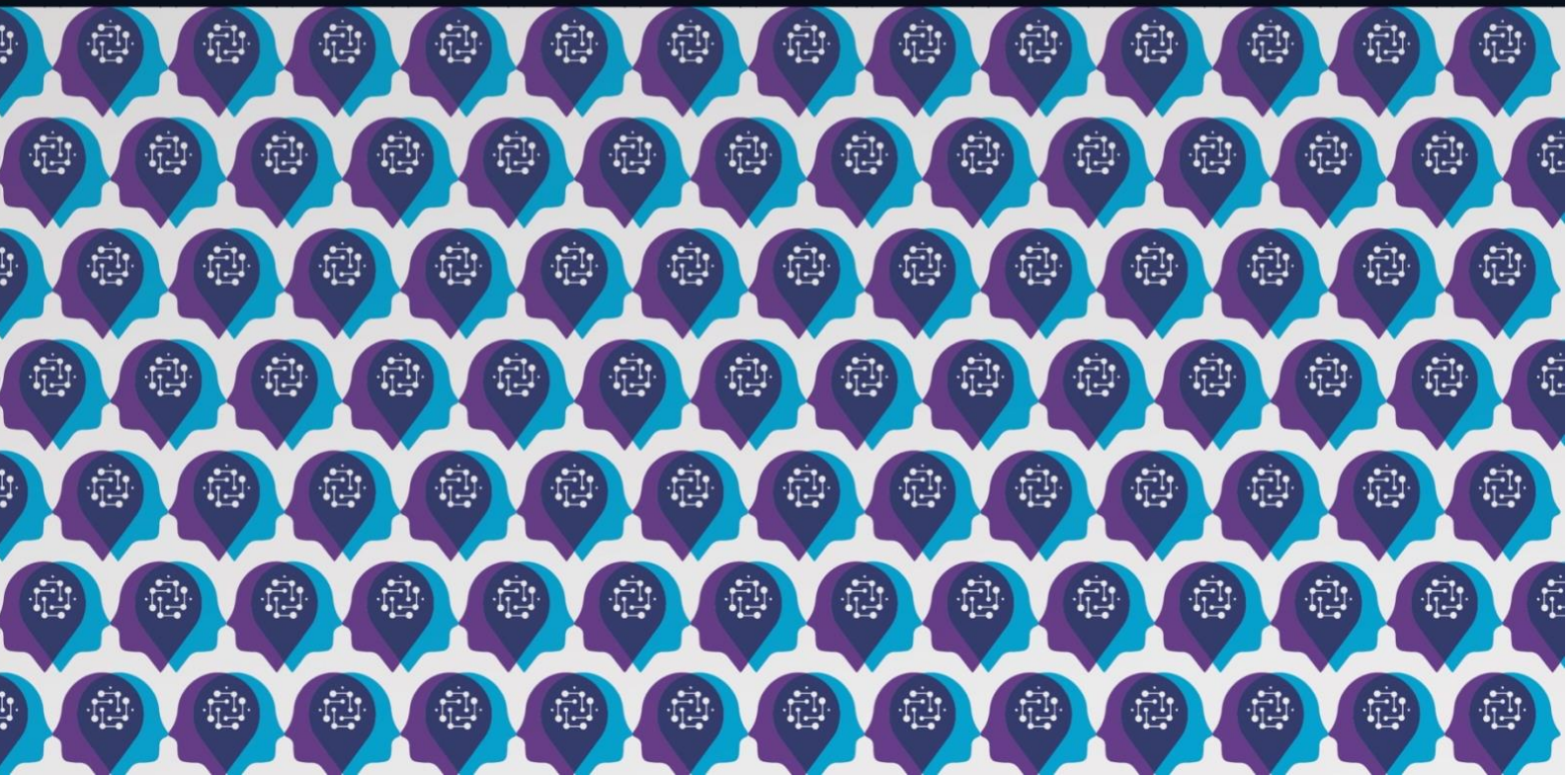
AI4Debunk

D4.2 WORKING PAPER 2

Information manipulation in the EU media ecosystem and response effectiveness

DECEMBER 2024

Funded by
the European Union



Grant Agreement No.: 101135757
Call: HORIZON-CL4-2023-HUMAN-01-CNECT
Topic: HORIZON-CL4-2023-HUMAN-01-05
Type of action: HORIZON Innovation Actions

D4.2 WORKING PAPER 2

Information manipulation in the EU media ecosystem and response effectiveness

Project Acronym	AI4Debunk
Project Number	101135757
Project Full Title	Participative Assistive AI-powered Tools for Supporting Trustworthy Online Activity of Citizens and Debunking Disinformation
Work package	WP 4
Task	Task 4.2
Due date	31/12/2024
Submission date	28/12/2024
Deliverable lead	LATVIJAS UNIVERSITATE / UNIVERSITY OF LATVIA (UL)
Version	v1.0
Authors	Inna Šteinbuka, Žaneta Ozoliņa (LATVIJAS UNIVERSITATE / UNIVERSITY OF LATVIA - UL) Alessia D'Andrea, Arianna D'Ulizia (CONSIGLIO NAZIONALE DELLE RICERCHE - CNR-IRPPS) Pascaline Gaborit, Joen Martinsen (PILOT4DEV - P4D) Alona Hryshko (INTERNEWS UKRAINE - IUA)
Contributors	Sigita Struberga (LATVIJAS UNIVERSITATE / UNIVERSITY OF LATVIA - UL) Georgi Gotev (FREE MEDIA BULGARIA - EURACTIV)
Reviewers	Despina Elisabeth Filippidou, Anastasios Manos (DOTSOFT OLOKLIROMENES EFARMOGES DIADIKTIOY KAIVASEON DEDOMENON AE – DotSoft)
Abstract	The working paper offers a comprehensive analysis of the EU's communication strategies, challenges, and responses amid a rapidly evolving media landscape. It examines the influence of social media, global digital platforms, and member states' perspectives. The relevance of media literacy and critical thinking in countering disinformation is examined.
Keywords	Critical thinking, effective instruments, EU media landscape, media literacy, social media.

Funded by the European Union

DOCUMENT DISSEMINATION LEVEL

Dissemination level	
X	PU - Public
	SEN - Sensitive

DOCUMENT REVISION HISTORY

Version	Date	Description of change	List of contributor(s)
0.1	13/11/2024	Final draft version	UL, EURACTIV, IUA, P4D, CNR-IRPPS
0.2	25/11/2024	Internal Quality Assessment Review	DotSoft
0.3	26/11/2024	Implementation of suggestions	UL
0.4	30/11/2024	Project Coordinator Review	UL
1.0	01/12/2024	Final version ready for submission	UL

STATEMENT ON MAINSTREAMING GENDER

The AI4Debunk consortium is committed to including gender and intersectionality as a transversal aspect in the project's activities. In line with EU guidelines and objectives, all partners – including the authors of this deliverable – recognise the importance of advancing gender analysis and sex-disaggregated data collection in the development of scientific research. Therefore, we commit to paying particular attention to including, monitoring, and periodically evaluating the participation of different genders in all activities developed within the project, including workshops, webinars and events but also surveys, interviews and research, in general. While applying a non-binary approach to data collection and promoting the participation of all genders in the activities, the partners will periodically reflect and inform about the limitations of their approach. Through an iterative learning process, they commit to plan and implement strategies that maximise the inclusion of more and more intersectional perspectives in their activities.

Funded by the European Union

DISCLAIMER

The AI4Debunk project has received funding from the European Union's Horizon Europe Programme under the Grant Agreement No. 101135757.

COPYRIGHT NOTICE

How to cite this report: AI4Debunk (2024). **D4.1 WORKING PAPER 2. Information manipulation in the EU media ecosystem and response effectiveness.** *Link from website when deliverable is public.*

The AI4Debunk consortium is the following:

Participant number	Participant organisation name	Short name	Country
1	LATVIJAS UNIVERSITATE / UNIVERSITY OF LATVIA	UL	LV
2	FREE MEDIA BULGARIA	EURACTIV	BE
3	PILOT4DEV	P4D	BE
4	INTERNEWS UKRAINE	IUA	UA
5	CONSIGLIO NAZIONALE DELLE RICERCHE	CNR-IRPPS	IT
6	UNIVERSITA DEGLI STUDI DI FIRENZE	MICC/UNIFI	IT
6.1	CONSORZIO NAZIONALE INTERUNIVERSITARIO PER LE TELECOMUNICAZIONI	CNIT	IT
7	BARCELONA SUPERCOMPUTING CENTER / CENTRO NACIONAL DE SUPERCOMPUTACION	BSC	ES
8	DOTSOFT OLOKLIROMENES EFARMOGES DIADIKTIOY KAIVASEON DEDOMENON AE	DOTSOFT	EL
9	UNIVERSITE DE MONS	UMONS	BE
10	UNIVERSITY OF GALWAY	UoG	IE
11	STICHTING HOGESCHOOL UTRECHT	HU	NL
12	STICHTING INNOVATIVE POWER	IP	NL
13	F6S NETWORK IRELAND LIMITED	F6S	IE

Funded by the European Union

TABLE OF CONTENTS

EXECUTIVE SUMMARY **8**

INTRODUCTION **9**

1 MAPPING EU MEDIA LANDSCAPE: INSTITUTIONAL AND MEMBER STATES' PERSPECTIVES - INNA ŠTEINBUKA **10**

1.1 Information Manipulation and EU Communication 11
1.2 Fighting Disinformation 12
1.3 EU Media Landscape 14
1.4 EU Citizens' Perceptions 17
1.5 Conclusions 20
1.6 References 20

2 FAKE NEWS, MEDIA LITERACY AND CRITICAL THINKING - JOEN MARTINSEN, PASCALINE GABORIT **21**

2.1 An approach on "critical thinking" 23
2.2 critical thinking and education 24
2.3 References 26

3 IDENTIFICATION OF EFFECTIVE INSTRUMENTS COUNTERING DISINFORMATION - ALESSIA D'ANDREA, ARIANNA D'ULIZIA **28**

3.1 Information manipulation and democracy 28
3.2 Initiatives by Governmental Institutions and Private Stakeholders 30
3.3 The role of citizens 34
3.4 References 37

4 COUNTERING DISINFORMATION ON FACEBOOK, INSTAGRAM, YOUTUBE, TIK TOK AND TELEGRAM: INSIGHTS FROM UKRAINE - ALONA HRYSHKO **38**

4.1 Importance of the issue 38
4.2 Key challenges 39
4.3 Tik Tok specific challenges 40
4.4 Methodical identification: meta case 40
4.5 Partnerships for fact-cheking 41
4.6 User reporting system 41
4.7 "4Rs" principles on Youtube 42

5 MEDIA LANDSCAPE PER COUNTRY - JOEN MARTINSEN **43**

5.1 Norway 43
5.2 Germany 44
5.3 United Kingdom 45
5.4 Belgium 46
5.5 Italy 47
5.6 France 48
5.7 Greece 49
5.8 Bulgaria 50
5.9 Latvia 51
5.10 Poland 51
5.11 Spain 52
5.12 Switzerland 53
5.13 Ukraine 54
5.14 Conclusions 55
5.15 References 56

6 CONCLUSIONS **57**

Funded by the European Union

LIST OF FIGURES

FIGURE 1. EUROBAROMETER SURVEY QUESTION: HOW MUCH DO YOU TRUST OR NOT THE NEWS AND INFORMATION YOU ACCESS THROUGH…? (% - EU), (EUROPEAN COMMISSION, 2018, MARCH)..... 17

FIGURE 2. EUROBAROMETER SURVEY QUESTION: HOW OFTEN DO YOU COME ACROSS NEWS OR INFORMATION THAT YOU BELIEVE MISREPRESENT REALITY OR IS EVEN FALSE? (% - EU), (EUROPEAN COMMISSION, 2018, MARCH) 18

FIGURE 3. EUROBAROMETER SURVEY QUESTION: HOW CONFIDENT OR NOT ARE YOU THAT YOU ARE ABLE TO IDENTIFY NEWS OR INFORMATION THAT MISREPRESENT REALITY OR IS EVEN FALSE? (% - EU), (EUROPEAN COMMISSION, 2018, MARCH)..... 18

FIGURE 4. EUROBAROMETER SURVEY QUESTION: IN YOUR OPINION, IS THE EXISTANCE OF NEWS OR INFORMATION THAT MISREPRESENT THE REALITY OR EVEN FALSE A PROBLEM IN (OUR COUNTRY)? (% - EU), (EUROPEAN COMMISSION, 2018, MARCH) 19

Funded by the European Union

ABBREVIATIONS

AI	Artificial intelligence
ASEAN	Association of Southeast Asian Nations
COP	EU Code of Conduct on Countering Illegal Hate Speech Online.
DG COMM	Directorate-General for Communication
DSA	Digital Services Act
EC	European Commission
ECHR	European Court of Human Rights
EDAP	European Democracy Action Plan
EDMO	European Digital Media Observatory
EEAS	European External Action Service
EU	European Union
FIMI	Foreign information manipulation and interference
HLEG	High-Level Expert Group
ICT	Information and communication technologies
IFCN	International Fact-Checking Network
MStV	Media Services Agreement
NATO	NATO (North Atlantic Treaty organization) Strategic Communications Centre of Excellence Stratcom
NGO	Non-governmental organization
NRK	Norwegian Broadcasting Corporation
RAS	Rapid Alert System
RSF	Reporters Without Borders
VLOP	Very Large Online Platforms

Funded by the European Union

EXECUTIVE SUMMARY

The working paper analyzes the European Union's (EU) strategic communication challenges and efforts to address disinformation in a complex media environment. The rise of disinformation flows, especially during crises like Brexit, COVID-19, and Russia's invasion of Ukraine, has introduced unprecedented challenges for European society, fostering Euroscepticism, eroding public trust, and challenging EU institutions to connect with citizens.

In response, the EU has deployed various institutional mechanisms to counter disinformation, including the East StratCom Task Force, the EU Action Plan Against Disinformation, cooperation with digital platforms and strengthening media literacy and critical thinking among citizens. Nonetheless, the rapid evolution of the digital media landscape, including the influence of social media and global digital platforms, has intensified the spread of disinformation, complicating the EU's efforts.

While public opinion remains cautiously supportive of the EU, as seen in Eurobarometer surveys, rising support for Eurosceptic and extreme-right parties signals potential challenges. The EU's communication strategy, therefore, must balance factual transparency with emotional engagement, aiming not only to inform but to build resilience against divisive narratives. Moving forward, the EU must continue adapting its strategy, reinforcing partnerships with member states, and advancing media literacy to ensure effective communication that strengthens democratic values and resilience among its citizens.

Funded by
the European Union

INTRODUCTION

The working paper "Mapping EU Media Landscape: Institutional and Member States' Perspectives" offers a comprehensive analysis of the European Union's (EU) communication strategies, challenges, and responses amid a rapidly evolving media landscape. It examines the influence of social media, global digital platforms, and member states' perspectives. Over recent decades, the EU has faced an unprecedented period of crises, beginning with the 2008 financial crisis and extending through migration issues, Brexit, the COVID-19 pandemic, and Russia's invasion of Ukraine. Each of these crises has been accompanied by disinformation campaigns that spread rapidly through both traditional and digital media, driving polarization, Euroscepticism, and declining public trust in EU institutions, complicating efforts to sustain the European project.

The paper addresses key questions raised by the shifting European media landscape. The first section examines the EU's communication strategy, focusing on efforts to combat disinformation and promote institutional resilience. This includes an analysis of the roles played by the European Commission (EC), the European External Action Service (EEAS), and collaborations with member states. Central areas of investigation include the EU's responses to information manipulation, its adaptation to a more polarized media environment, and the impact of these factors on public perceptions of the EU's effectiveness.

The second chapter explores the role of media literacy and critical thinking in addressing the complexities of fake news, misinformation, and disinformation. While technological solutions are essential for curbing disinformation, individual choices remain pivotal. Recognizing this, EU institutions emphasize media literacy and critical thinking as powerful tools for counteracting disinformation at the individual level. This chapter discusses how media literacy and critical thinking help individuals develop the skills needed to navigate complex information landscapes and make evidence-based decisions, as well as the limitations and impact of these skills.

The third chapter provides an in-depth analysis of the various instruments used to counter disinformation at EU, member state, private enterprise, and citizen levels. All engaged parties are clearly committed to developing effective, audience-specific tools. However, a primary challenge is fostering collaboration among stakeholders and encouraging active citizen participation.

The fourth chapter addresses disinformation from the perspective of social media in the context of the ongoing war in Ukraine, beginning in 2014 and intensifying with Russia's full-scale invasion in 2022. Social media platforms have adopted diverse strategies to counter fake news and disinformation through a combination of advanced technology, human moderation, partnerships, and user participation. This chapter scrutinizes these approaches and evaluates their effectiveness.

The concluding chapter provides an in-depth look at the diverse media environments across European countries, shaped by regional, linguistic, cultural, and political factors. European media landscapes range from environments with high levels of press freedom and strong journalistic traditions to those constrained by political influence, financial pressures, and restrictions. Understanding these differences, as well as the specific characteristics of media outlets in each region, is crucial for comprehending how disinformation spreads, contextualizing its impact, and supporting more targeted strategies to counter disinformation across Europe.

Funded by the European Union

1 MAPPING EU MEDIA LANDSCAPE: INSTITUTIONAL AND MEMBER STATES' PERSPECTIVES- Inna Šteinbuka

Common communication culture in the EU emerged in a pieceful environment and relatively friendly media landscape. In the European institutions, communication was grouped broadly around a widely shared mission to 'build Europe', 'advance the European project' and persuading people to support EU objectives. It necessitates explaining long-term goals, defining common interest, and mobilizing arguments in favour of a political vision on how to achieve better citizens' lives in the future (Nugent and Rhinard, 2019). How does this concept work in times of information manipulation and massive spread of disinfomation? How effectively does communication correspond with the rapidly changing EU media landscape?

Few would challenge the assertion that the EU is experiencing extraordinary times. Since 2008, the EU has gone through a number of severe crises (economic and financial crisis, migration crisis, terrorist attacks, "Brexit"). The disinformation accompanied all of these crises and its spread is increasing exponentially. This unthinkable blending of various crises combided with disinformation lead to a major identity crisis, mounting Euroscepticism and extremism and shaking popular trust in the European project. In 2016, many Europeans met the outcome of the United Kingdom referendum with a feeling of sadness. The others who, to the great extent, are poisoned by propaganda, applauded to "Brexit" with a hope that the European project would break down. Fortunately, negative predictions have not become reality. Unfortunately, the time of hard times is not over.

In 2020-2022, the EU like the entire word struggled with the unprecedented public health crisis, related acute socio-economic and communication challenges. The EU response and changes in the strategic communication since Russia's invasion in the Ukraine have been even more dramatic. Since 24 February 2022, Europe remains a continent at war, struggles with a powerful propaganda and tries to prevent foreign interference. The underlying truth is that neither the EU nor the Member States were ready for communication in any of recent crises.

In the "fake news" environment it is rather challenging to explain the EU citizens what the EU institutions have delivered to prevent or at least tangibly reduce consequences of a crisis. Faced with Eurosceptic parties in many of the EU Member States, European citizens need to be able to understand whether and how the EU affects their daily lives in hard times. Complexity of the communication experienced during COVID-19 crisis and the war in Ukraine is twofold: explanation based on facts to achieve people's minds and emotional engagement to reach the people's heards. Without strong emotional component, it would be problematic for the EU to win the battle with "infodemic" (a term derived from the combination of the words "information" and "pandemic" and denotes the rapid spread of difficult-to-verify information) and defend European narratives in geo-political struggle for influence with Russia and China.

Communication is getting more and more complex also because the traditional and social media landscape in the EU is changing rapidly (European Commission, 2023, May). Digitization, the spread of globally interactive delivery platforms, greater emphasis on data, capital concentration, concerns about undue political interference and fake news, plus transformation in journalism and news production are among the triggers for these changes. Media play a crucial socio-cultural and political role through shaping views and aspirations, opinions, political choices and identities. Gap exists in knowledge about the implications of recent transformation in the European media landscape for Europe as a whole and at the national and regional levels. The role of contemporary media in fostering the process of political and cultural Europeanization through re-shaping towards a European political and cultural representations and identities needs to be better understood.

Funded by the European Union

Changing perceptions of European citizens to the certain extent reflect the effectiveness of the communication. The Eurobarometer is one of the more reliable tools to assess whether the explanations were well received and understood.

The paper focuses on

- the challenges of EU communication in the disinformation environment;
- the description of the current European media landscape;
- the analysis of Eurobarometer-based public perceptions: does the combined effect of EU communication and media landscape foster or hamper the European project and societal cohesion.

1.1 INFORMATION MANIPULATION AND EU COMMUNICATION

Propaganda has always been used by world powers to strengthen their influence. The biggest advantage of propaganda is that it is hard to "see", but incredibly effective in influencing people's minds. As the American writer Mark Twain said, “it is much easier to deceive a person than to convince him that he has been deceived”.

Europe has long lived with the knowledge that propaganda refers to authoritarian and totalitarian regimes. However, during “Brexit”, and particularly during the Covid-19 crisis, the enourmous usage of different information manipulation technique made Europeans wake up. The flood of information often false or inaccurate, spreads quickly over social media, creates confusion and distrust and undermines the EU and national response. In this critical situation, fighting disinformation is one of the crucial responses to the crisis.

Communication is not the strongest EU quality. The EU services are not sufficiently equipped against massive disinformation. “We need to improve the communication with each other – among Member States, with EU institutions, but most importantly with our citizens. We should inject more clarity into our decisions. Use clear and honest language. Focus on citizens’ expectations, with strong courage to challenge simplistic solutions of extreme or populist political forces” (European Council, 2016). These conclusions of the Bratislava Declaration adopted by 27 EU Member States in 2016 are very relevant today.

The COVID-19 crisis perfectly demonstrated the weak preparedness of the EU in the fight against the destructive propaganda. However, the lessons learned during Covid-19 crisis helped the EU demonstrate a high degree of adaptability and impressive communication after February 24, 2022. The EU has managed to somewhat reduce its communication weakness: the individual countries, the European Commission, NATO Stratcom and other international organizations have taken the activities of fact-checking and debunking disinformation much more seriously. However, the EU communication methods and style during crises do not considerably differ.

All EU institutions, including the European Parliament and the European Council are responsible for the communication with the Europeans, and the European Commission has in the communication process a crucial role.

At the *polical level,* the EC President and commissioners have to fully play their leadership role and to be more prominently involved in addressing citizens. At the *civil servance level*, the Directorate-General for Communication (DG COMM) is responsible for explaining EU policies to outside audiences, defining the Commission’s corporative image, monitoring trends in public opinion and the media, informing the Commission on reputational risks in Member states, and coordinating the communication campaigns. As important part of the DG COMM**,** the European Commission’s representations play an important role at national level, being the extension and hub of the EC in the Member States. The EU External Action Service (EEAS) communicates with foreign audiences about EU foreign affairs, security and defense policy. The

Funded by the European Union

EEAS strategic evidence-based communication focuses on countering disinformation, narrative positioning and strengthening of the overall media environment and civil society.

Communication must not be the responsibility of European institutions alone. It must be shared with the Member States. The European polititians across all other levels (national, local and regional) should be co-owners of the EU delivery and partners in conveying consistent explanatory messages. Quite often instead of "singing in unison" with the EU, the Member states tend to present any success story as their own success and blaim the EU for any failures. In this regard, EC Representations, which are connecting in their daily work with national, regional and local authorities, social partners, academics, journalists, businesses, cultural actors and the media, can be instrumental in engaging national partners in positive communication on the EU response and deliveries. During crises, aside national information channels, the EU has played a significan role in communication through its institutions, multipliers and networks in the Member States, in its neighbourhood and beyond. However, the communication could have been better.

As public bodies, the EU institutions' communication tend to be mostly rational, based on facts and figures. Indeed the 'rational' advantages of the Union can be well explained in a non-emotional way. In business-*as-usual times* the rational explanation of the major EU success stories works well. Disappearance of customs procedures for trade between Member States, the absence of internal border conrol, the ability of young people to engage in student exchanges and the free-of-charge mobile telephony roaming in the EU can be well communicated in a traditional evidence-based way. But these achievements alone will not succeed in changing people's attitudes *in times of crises*. According to Luc Van den Brande (Van den Brande, 2017), the role of EU institutions is much broader than simply providing information. It must also be based on a degree of emotional engagement with the Union by Europeans. When times are tough, the rational explanation of the EU response is not sufficient for the public acknolegement. People's emotions like fear, frustration and anger tend to overshadow any evidence-based communication and facts, especially when political leaders are helpless in finding a proper combination of facts and emotions to provide reasons for hope and confidence.

During crisis the Union must more than usual confront the cynics and the sceptics, showing that it is delivering. In these critical situations, providing citizens with comprehensive facts and figures is certainly vital for winning the people's minds but clearly not enough. Winning the hearts of citizens is a more challenging task for politicians.

Russia's full-scale invasion of Ukraine has shocked Europeans. With unprecedented unity among its Member States and in partnership with G7 allies, the EU has weaponised its trade and financial instruments to punish the invaders. The detailed description of the EU initial response can be found, for example, in a CEPS special report (Blockmans, 2022). The monitoring of the ongoing respose and provided assistance can be found in the EU Solidarity with Ukraine – timeline (European Commission, 2024). We argue that after so many crises over the past 15 years, the EU finally responded rapidly and decisive to the Russian invasion of Ukraine

1.2 FIGHTING DISINFORMATION

The issue of disinformation, fake news and propaganda has been a dominant theme in the headlines for several years. The emotional reaction of the Europeans to the war in Europe forged an unprecedented unity within the EU. However, the 'war fatigue' challenges people's abilities to distinguish truth from lies, especially as the disinformation is getting more massive.

Disinformation destroys people's faith in traditional news sources – which have ethical standards and legal responsibilities to report the facts, often more complex and less viral than a simplistic hostile narrative and manipulate public opinion.

Funded by the European Union

The EC approach to counter disinformation was established, when the Commission outlined disinformation as a leading threat to democracies across Europe, as well as to the European Union itself. In December 2018, the EC launched its Action Plan Against Disinformation, which remains a key pillar of the EU policy. This action plan placed disinformation within the context of hybrid threats and highlighted the role of strategic communications (European Commission, 2018, December).

In turn, the approach used in Action Plan - 2018 was built on the experience since 2015 of the rather small East StratCom Task Force, set up in the EEAS to address disinformation campaigns originating in Russia and affecting the EU Member States after the annexation of Crimea.

As EC resources are limited, the idea was to *strengthen communication in the Member States* based on the enhanced cooperation of the EC with the key communication actors such as public authorities, journalists, researchers, fact-checkers, online platforms, and civil society. In March 2019, a Rapid Alert System (RAS) was established to connect disinformation experts from EU Institutions and Member States and to facilitate proactive and effective communication. The RAS aimed at raising public awareness of disinformation and enabling better co-ordination of responses, has faced criticism, however, that a lack of trust among member states has caused low levels of information sharing and engagement (OECD, 2022, November).

The challenges of fighting desinformation during the Covid-19 crisis were far more complicated compared with previous experience. Since the beginning of the pandemic, dangerous information is being spread through various misinformation and disinformation channels. Responding to these new challenges, in June 2020, the EC issued Communication "Tackling COVID-19 disinformation - Getting the facts right" (European Commission, 2020). This Communication has highlighted the immediate response to disinformation, and concrete actions to follow, which can be quickly implemented with limited resources. The following non-exhaustive list of examples illustrates the complexity of the situation:

- *Information circulating includes dangerous and misleading healthcare information* with false claims (such as 'it does not help to wash your hands' or 'the Coronavirus is only a danger to the elderly');
- *Conspiracy theories* (for example conspiracies and myths about 5G installations);
- *Illegal hate speech* (for example because of disinformation about a particular ethnic or religious group being blamed for the spread of COVID-19),
- *Consumer fraud* (for example selling of 'miracle products' with unsupported health claims);
- *Cybercrime* (such as hacking/phishing using COVID-19 related links to spread malware)

Such desinformation content, mostly illegal, directly endanger human health and lives by fuelling vaccine hesitancy, provoke the racist and xenophobic sentiments, lead to general anxiety and polarisation of society, and create social unrest and public violence.

The communication during COVID-19 crisis was not a war but it was 'war-like' as the EU has been engaged in the "infodemic" global battle of narratives, in which it had to face many powerful opponents. Geo-political component of "infodemic" were very challenging as foreign actors, in particular Russia and China, are very experienced in organising toxic disinformation campaigns, using various manipulating techniques and destructive narratives for "anti-EU" propaganda in their struggle for influence.

For instance, the vaccines themselves have become commodities in the so called "Vaccine diplomacy". In this global diplomacy and war of narratives, Russia and China were using state-controlled media to spread disinformation about Western-developed vaccines and intensively promote their own state-produced vaccines around the world. This "Vaccine diplomacy" was combined with efforts to undermine trust in the EU institutions and Western/European vaccination strategies (EUvsDisinfo staff, 2021).

The COVID-19 crisis has become a test case showing that the effectiveness of how the EU and its democratic societies deal with desinformation and destructive "propaganda" remains rather low. The obvious conclusion was that the EU should become better prepared for the information war.

Funded by the European Union

Since Russia's invasion in Ukraine, in parallel with individual country efforts, the EC like the other international organisations have undertaken fact-checking and debunking activities to counter Russian massive propaganda and disinformation. For instance, since February to November 2022, EUvsDisinfo has tracked more than 237 disinformation cases relating to Ukraine, and more than 5 500 disinformation total cases about Ukraine since its establishment in 2015 (out of more than 13 000 total examples of pro-Kremlin disinformation) (OECD, 2022, November).

Summarising the EU experience and response to the threat posed by disinformation, misinformation and foreign influence, one can conclude that in response to the war in Ukraine this gap has been considerably narrowed. The emotional reaction of the European citzens to the war in Europe forged the EU unprecedented unity. Despite concerns, the millions of Ukrainian migrants have not triggered a populist backlash. Rising energy prices have not encouraged the Europeans to push their governments for breaking with Ukraine. Furthermore, there were concerns that Europe would not get through the winter without Russian gas, but this "horrific scenario" has not happened. Europe has held firmly and adapted to the challenges. In the end, Europe's response has demonstrated the strength and resilience of democracy.

As the European elections are a flagship of European democracy it is not a surprise that in June 2024, disinformation actors from inside and outside the EU tried to undermine trust in democratic processes and broaden division and polarisation in our societies. The information space in the European MS was full with false and misleading information, all with the aim of hijacking the public debate. Several European policies are often target of disinformation: support to Ukraine, the European Green Deal and migration.

According to the The Flash Eurobarometer on Fake News and Online Disinformation (European Commission, 2018, March), 83% of the EU citizens agree that news or information that misrepresent reality or is even false is a problem for democracy. Institutions, authorities, civil society actors and fact-checkers such as the European Digital Media Observatory, the European Fact-Checking Standards Network and EUvsDisinfo have detected and exposed numerous attempts to mislead voters with manipulated information.

While the threats are there, so are EU's collective responses. Based on a clear mandate from the political leadership, the EU institutions have been tackling the challenge stemming from foreign information manipulation and interference, including disinformation for years.

In this mandate, important legislation has been adopted by co-legislators, such as the Digital Services Act (DSA), the AI Act and the Act on Transparency and Targeting of Political Advertising.

Disinformation should be fought not only by legal means but also by more qualitative information. Quality and authoritative journalism instead of influencers can help defeat disinformation. It is necessary to address the increasing intimidation directed at journalists in EU Member States and any political interference in the media. More public support for independent media and for investigative journalism, as well as for developing anti-trust measures to combat media concentration and monopolies of media ownership must be at the core of the EU actions.

1.3 EU MEDIA LANDSCAPE

The EU communication tools depend on the European media landscape. In the last decade, the European media landscape has undergone a deep transformation due to technological innovations and the entry of new global players (European Commission, 2023, May). Understanding the media landscape is crucial for effective EU communication, reputation management, and crisis response (LinkedIn, 2024). It allows the EU institutions to navigate the complex media environment, connect with their target audience, and influence public opinion.

Funded by the European Union

The media landscape includes a wide range of media forms such as traditional print and broadcast media, as well as digital and social media platforms. Within this landscape, various stakeholders play a role in producing, distributing, and consuming media. The landscape depends on various political, social and economic factors as well as on the rules and regulations that govern media practices within legal boundaries.

When exploring the media landscape, it is important to gain a comprehensive understanding of the various media channels available, ranging from traditional sources like newspapers, magazines, television, and radio to digital platforms and social media. It is also important to take into account the preferences, behaviors, and demographics of target European audience for each channel to determine the most effective ways to engage with them.

Additionally, the analysis of media landscape includes identifying key influencers and opinion leaders at the European, national and regional level. This knowledge would help EU leaders tailoring messages and creating targeted communication campaigns that resonate with the audience.

Furthermore, understanding the media landscape enables European leaders to prepare for potential crises or negative publicity by effectively managing media relationships and creating strategic responses.

The media landscape has many different elements, including traditional media, digital platforms, and emerging trending media. Together, they shape how we consume information and engage with content. Let's explore what they are:

Traditional Media include Print Media such as newspapers, and magazines and Broadcast Media such as television, radio, which have a significant influence on the media landscape.

Digital Media includes online media such as websites, online news outlets, blogs, and social media platforms such as Facebook, Twitter, and Instagram. They enable information sharing and audience engagement, playing a pivotal role in shaping the media landscape.

News Agencies, such as Reuters, Associated Press (AP), Agence France-Presse (AFP), and Bloomberg, gather and distribute news stories to other media outlets. Also, many industries have their own Industry-Specific Publications that focus on news, analysis, and trends within those industrial sectors.

Bloggers and digital influencers produce content on various platforms such as personal blogs, YouTube channels, and social media.

Podcasts, which are getting increasingly popular, offer a unique way for individuals and organizations to connect and share information.

Streaming Services, such as Shahid, Netflix, and Amazon, provide on-demand content and have transformed the way we watch television, representing a new form of traditional TV in the digital era.

The Gaming industry has become a significant part of the media landscape, captivating millions worldwide and offering innovative branding opportunities.

Advertising is crucial for reaching target audiences, advertising spans across traditional channels, digital platforms, and collaborations with influencers.

Definition of the media landscape involves:

- understanding the various media channels that European audience uses to consume information;
- investigating the potential audience reach and impact of each media channel;
- gaining insights into how the target audience consumes media;
- identifying different types of media segments, which may include print media (newspapers, magazines), broadcast media (television, radio), online media (news websites, blogs), social media platforms, industry-specific publications, and more;
- analysing media directories (comprehensive listings of newspapers, magazines, TV and radio stations, online news sources, etc.);
- tracking media ownership and political affiliations in order to get insights into potential biases or influences within the media landscape;

Funded by the European Union

- monitoring content and editorial focus: types and thematic focus of news stories, editorial tone, etc. to better understand the overall landscape and the variety of viewpoints represented;
- assessing credibility and reputation of media outlets including indicators of journalistic integrity, adherence to ethical standards, and accuracy in reporting;
- exploring the regulatory environment managing the media landscape (laws, regulations, and policies that impact media operations, freedom of the press, and content dissemination);
- monitoring social media to gain insights into the conversations and topics that are relevant to your audience, identifying the social media channels that the audience is most active on and the influencers they follow.
- analysing social media platforms, online communities where news and information are shared, the role of influencers, user-generated content, and emerging platforms in shaping the media landscape.

Comprehensive analysis of the media landscape can be found in Liberties Media Freedom Report 2024 (Civil Liberties Union for Europe, 2024), which reveals that media freedom and media pluralism are close to breaking point in many EU countries. The continued erosion of media freedom is evidenced by widespread harassment of journalists and governments restricting access to information. Heavy media ownership concentration and threats to the independence and finances of public service media contribute to a shrinking media plurality.

A diverse and free media environment is crucial for democracy. Relyability of independent news outlets is important to hold politicians accountable and EU citizens informed. Based on findings from over two dozen civil liberties organisations from 19 countries across the EU, the report covers media freedom and pluralism, safety and protection of journalists, and freedom of expression and access to information in 2023, a year when the media landscape was shaped not only by new legislation (Anti-SLAPP Directive, Digital Services Act, European Media Freedom Act), but also elections (Poland, the Netherlands, Slovakia) and regional conflicts (Russia-Ukraine, Middle East).

Media pluralism continues to be squeezed by concentrated media ownership and insufficient ownership transparency rules. Public service media and independent media continue to operate under increasingly financially precarious conditions, hampering their ability to deliver impartial, reliable news.

In Greece, Hungary and Romania, spending on state advertising is used to further threaten the survival of independent, critical outlets by disproportionately funnelling funds to government-friendly media. In Ireland, France and Slovenia, the long-term funding prospects of public service media remain uncertain. Political interference remains a persistent issue in some countries; Hungary's public media continues to operate as a government mouthpiece, and there are growing concerns about impartiality in Italy and Croatia.

A variety of reputable, unbiased established news sources exposes citizens to a plurality of perspectives and issues. This improves resilience against disinformation and is an antidote to the divisiveness that plagues social media and online news - which is amongst the reasons why media plurality is essential in a healthy democracy.

Governments withholding information from the press is also on the rise. Journalists who are critical of the government may find themselves excluded from press conferences or other official events or denied access to documents.

To conclude, the media landscape is a structured mountain of media outlets, channels, and platforms that shape the way information is created, shared, and consumed. Understanding the media landscape is crucial for effective communication strategy building in the EU and the Member States. With this knowledge the EU communications professionals can better connect with their target audience, influence public opinion and debunk disinformation.

An analysis of the media landscape in selected European countries is presented in the 5 chapter.

Funded by the European Union

1.4 EU CITIZENS' PERCEPTIONS

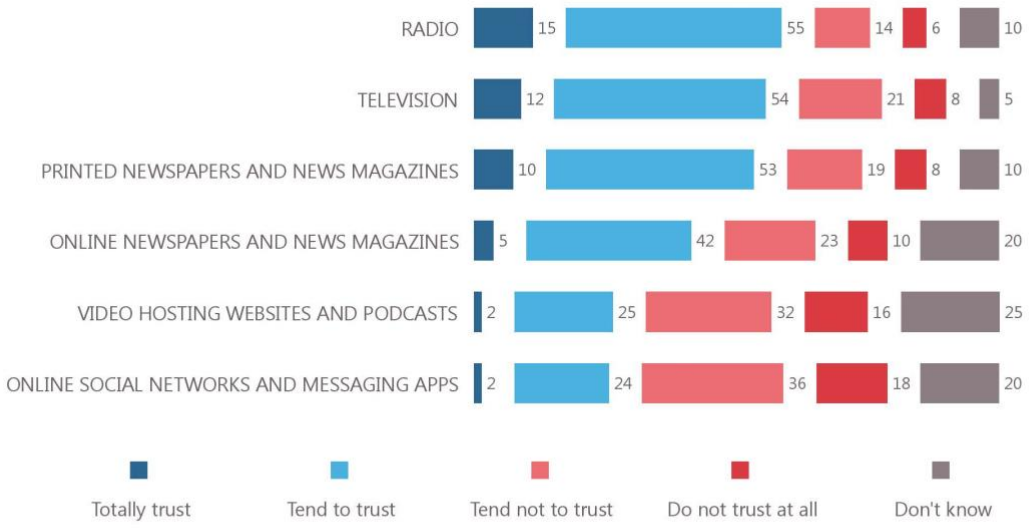
The Flash Eurobarometer on Fake News and Online Disinformation (European Commission, 2018, March) was conducted early February 2018 in all EU Member States. Over 26.000 citizens were interviewed via telephone about their perception of fake news and their trust in news media sources. The findings show a clear concern for the spread of disinformation online in Europe.

Even before COVID-19 and Russain war in Ukraine, the results show that fake news are widely spread across the EU with 83% of respondents saying that fake news represent a danger to democracy.

The key findings are as follows:

- Respondents perceive traditional media as the most trusted source of news: radio (70%), television (66%) and printed newspapers and news magazines (63%);
- 37% of the respondents come across fake news every day or almost every day and 71% feel confident on identifying them;
- 85% of respondents perceive fake news as a problem in their country and 83% perceive it as a problem for democracy in general;
- in respondents' view, journalists (45%), national authorities (39%) and the press and broadcasting management (36%) should be the main responsible for stopping the spread of fake news.

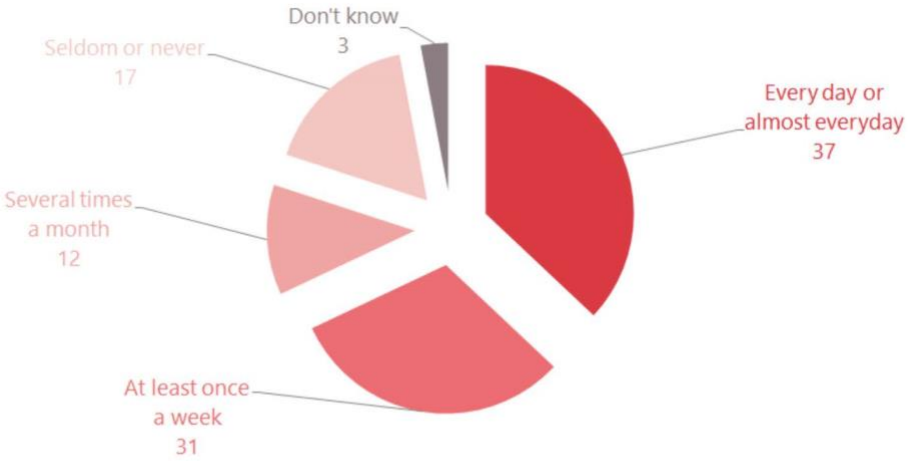
FIGURE 1. EUROBAROMETER SURVEY QUESTION: HOW MUCH DO YOU TRUST OR NOT THE NEWS AND INFORMATION YOU ACCESS THROUGH…? (% - EU), (EUROPEAN COMMISSION, 2018, MARCH)



Base: All Respondents (N=26,576)

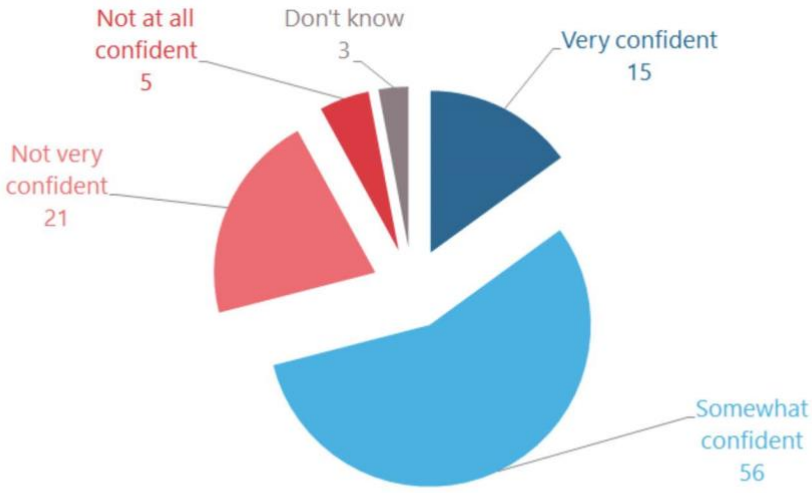
Funded by the European Union

FIGURE 2. EUROBAROMETER SURVEY QUESTION: HOW OFTEN DO YOU COME ACROSS NEWS OR INFORMATION THAT YOU BELIEVE MISREPRESENT REALITY OR IS EVEN FALSE? (% - EU), (EUROPEAN COMMISSION, 2018, MARCH)



Base: All Respondents (N=26,576)

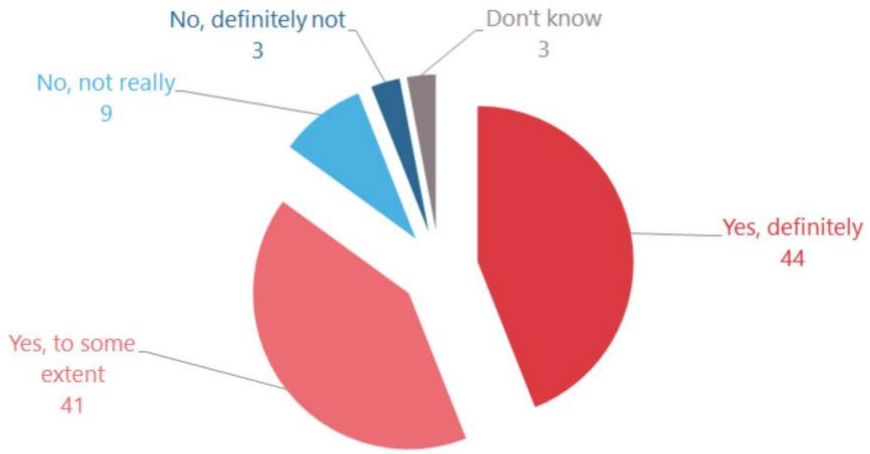
FIGURE 3. EUROBAROMETER SURVEY QUESTION: HOW CONFIDENT OR NOT ARE YOU THAT YOU ARE ABLE TO IDENTIFY NEWS OR INFORMATION THAT MISREPRESENT REALITY OR IS EVEN FALSE? (% - EU), (EUROPEAN COMMISSION, 2018, MARCH)



Base: All Respondents (N=26,576)

Funded by
the European Union

FIGURE 4. EUROBAROMETER SURVEY QUESTION: IN YOUR OPINION, IS THE EXISTANCE OF NEWS OR INFORMATION THAT MISREPRESENT THE REALITY OR EVEN FALSE A PROBLEM IN (OUR COUNTRY)? (% - EU), (EUROPEAN COMMISSION, 2018, MARCH)



Base: All Respondents (N=26,576)

The fundamental question is about the impact of "infodemic" on the public perceptions. The lived experience of the recent crises has split Europe as financial and refugee crises did. Europeans were divided over what they believe to be national governments or EU's response and whether the response was effective. The people's perceptions mirrow the effectiviness of the combination of EU response and EU communication during any crisis. It is impossible to split the impact of response and communication on the feelings of Europeans about the EU.

Nowadays, the sentiments of Europeans are related to the war in Ukraine. According to the standard Eurobarometer survey published in February 2023 (European Commission, 2023, February) 62% of respondents say they are optimistic about the future of the EU, like the level recorded in February 2022, before Russia's aggression against Ukraine. The findings of the recent Eurobarometer on the EU Challenges and Priorities (European Commission, 2024, July) conducted in July 2024 show a slight decreae of the Europeans' optimism: 58% of Europeans tend to be optimistic about the future of the EU. 55% of them say they are very or somewhat confident in the strength of EU's democracy in the next five years. Yet, at the same time, 64% of EU citizens tend to be concerned about the EU's security in the next five years.

In a nutshell, the Eurobarometer findings show that the combined effect of the EU communication in the changing and often unfovarable media landscape rather foster than hamper the European project. However, the increase of the strength of extreme-right parties overall in Europe is a dangerous trend, which requires smart adjustment of all communication actors to the changing and challenging media landscape.

Funded by
the European Union

1.5 CONCLUSIONS

1. From COVID-19 to war in Ukraine, and now conflict in the Middle East, disinformation today is shaping major global events. Disinformation also undermines people's trust in governments and other public institutions. This "atomic bomb" spans from misinformation to propaganda, from hostile narrative to hybrid warfare.
2. Disinformation destroys people's faith in traditional news sources – which have ethical standards and legal responsibilities to report the facts, often more complex and less viral than a simplistic hostile narrative and manipulate public opinion.
3. During hard times the Union must more than usual confront the cynics and the sceptics, showing that it is delivering. Providing citizens with comprehensive facts and figures is clearly not enough. The EU leaders need to find a proper combination of facts and emotional engagement to provide reasons for hope and confidence. Communication strategy should take into consideration the media landscape.
4. The need for strong leadership and effective communication increased after a decade of the EU's moving from one crisis to the next, massive spread of disinformation and worsening media landscape.
5. The EU communication tools depend on the European media landscape. Understanding the media landscape is crucial for EU effective communication, reputation management, and crisis response.
6. Almost two and a half years after Russia's full-scale invasion of Ukraine, the European citizens maintain their strong belief in the European project, however in July 2024, we have noticed a worrying reduction of the EU support by 4 percentage point compared with 2023.
7. The increase of the popular support of extreme-right parties overall in Europe is a dangerous trend, which requires smart adjustment of all communication actors to the changing and challenging media landscape.

1.6 REFERENCES

Blockmans, S. (2022, May). A transformational moment: the EU response to Russia's war in Ukraine. https://www.ceps.eu/wp-content/uploads/2022/05/A-transformational-moment_The-EUs-response-to-Russias-war-in-Ukraine.pdf

Civil Liberties Union for Europe. (2024). *Liberties Media Freedom Report 2024.* https://dq4n3btxmr8c9.cloudfront.net/files/flccsm/Media_freedom_Report2024.pdf

European Commission. (2018, March). *Final results of the Eurobarometer on fake news and online disinformation.* https://digital-strategy.ec.europa.eu/en/library/final-results-euroarometer-fake-news-and-online-disinformation

European Commission. (2018, December). *Action Plan Against Disinformation*. https://commission.europa.eu/document/download/b654235c-f5f1-452d-8a8c-367e603af841_en?filename=eu-communication-disinformation-euco-05122018_en.pdf

European Commission. (2020). *Tackling COVID-19 disinformation - Getting the facts right*. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52020JC0008

European Commission. (2023, February). *Standard Eurobarometer 98 - Winter 2022-2023.* https://europa.eu/eurobarometer/surveys/detail/2872

European Commission. (2023, May). *The European Media Industry Outlook*. file:///C:/Users/BVEF/Downloads/The_European_Media_Industry_Outlook_gSlquDKUttimCSzo8gO0dhvYuWI_95874.pdf

European Commission. (2024). *EU solidarity with Ukraine – timeline.* https://eu-solidarity-ukraine.ec.europa.eu/eu-solidarity-ukraine-timeline_en

Funded by the European Union

European Commission. (2024, July). *EU challenges and priorities.* file:///C:/Users/BVEF/Downloads/EU%20challenges%20and%20priorities%20FL550_report_en.pdf

European Council. (2016). *Bratislava Declaration and Roadmap.* https://www.consilium.europa.eu/en/press/press-releases/2016/09/16/bratislava-declaration-and-roadmap/

EUvsDisinfo staff. (2021, April 28). EEAS SPECIAL REPORT UPDATE: Short Assessment of Narratives and Disinformation Around the COVID-19 Pandemic (UPDATE DECEMBER 2020 - APRIL 2021). *EUvsDisinfo.* https://euvsdisinfo.eu/eeas-special-report-update-short-assessment-of-narratives-and-disinformation-around-the-covid-19-pandemic-update-december-2020-april-2021/

LinkedIn. (2024). *How do you monitor and analyze the media landscape and identify emerging trends and opportunities?* https://www.linkedin.com/advice/0/how-do-you-monitor-analyze-media-landscape-identify

Nugent N., Rhinard M. (2019). The 'political' roles of the European Commission. *Journal of European Integration*, 41(2) 2, 203-220. https://www.tandfonline.com/doi/full/10.1080/07036337.2019.1572135

OECD (2022, November). *Disinformation and Russia's war of aggression Against Ukraine.* https://www.oecd-ilibrary.org/docserver/37186bde-en.pdf?expires=1727860762&id=id&accname=guest&checksum=BA6EB740979E63AB19E294EE7A55F41B

Van den Brande, L. (2017*). Reaching out to EU citizens: a new opportunity.* https://www.oidp.net/docs/repo/doc238.pdf

2 FAKE NEWS, MEDIA LITERACY AND CRITICAL THINKING - Joen Martinsen, Pascaline Gaborit

The spread of disinformation and misinformation has a long history, but the term "fake news" became particularly prominent in public discourse during the 2016 American presidential election. In 2017, Collins Dictionary's lexicographers recognized "fake news" as the word of the year (Flood, 2017). Since then, the potential societal dangers posed by fake news have become evident. This is especially true in the contexts of Covid-19 and the Russian invasion of Ukraine, where governments have taken legislative action to curb disinformation. However, legislative strategies extend beyond specific "Anti-disinformation-acts". Chan (2023) argues that there is minimal reflection of the term "fake news" in both new and existing legislation. Instead, the issue of fake news is often addressed through the concepts of misinformation, disinformation, and malinformation. Despite these efforts, the problem of fake news remains largely unresolved by current legislation (p. 4). Therefore, this assessment will explore legislation aimed at countering the spread of disinformation and misinformation in various ways, not just those laws explicitly mention "fake news" in its objectives. It will evaluate the effectiveness of these legislative strategies and highlight any reported success stories. Effective ways to counter spread of fake news and disinformation on social media platforms has been Platform regulation and collaboration with service providers to enforce jurisdictional laws are some of the measures that countries have taken against the spread of the threat of fake news (Chan, 2023, p. 3).

A region that has tested out a lot of legislative measures ASEAN has many countries that have particularly used cybercrime laws to used to criminalize fake news. In Thailand it has be seen how

this regulation can be used to crack down on criticism of the crown or the government (Smith & Perry, 2020, p).

Harmful information encompasses more than just disinformation; it can also include various forms of hate speech and harassment, which are also targeted for regulation. Germany has implemented an anti-fake news law known as "NetzDG," which came into force on October 1, 2017. This law specifically targets social media companies with more than two million users in Germany (Santuraki, 2020, p. 299). The act mandates the removal of malicious content from the internet within a specified period once it has been legally determined to be harmful (Chan, 2023, p. 3). Research by Jiménez Durán et al. (2023) indicates that NetzDG has effectively reduced toxic comments and harassment targeting refugees since its implementation, demonstrating its success in regulating harmful content (Jiménez Durán et al., 2023, pp. 16-20).

Additionally, the new Media Services Agreement (MStV) has introduced measures to address disinformation in Germany. According to MStV guidelines, state media authorities have issued 13 warnings to websites spreading disinformation, including one associated with the far-right AfD. The MStV also requires that political, ideological, and religious advertisements, as well as content created by bots, be clearly labeled (Sections 18 (3) and 22 (1)) (EDMO, 2022, p. 18).

Elections have been a popular theme to target legislation specifically counter disinformation during election campaigns. In South Korea, fake news is perceived to be both a crime and civil wrong, which is exemplified with a case from November 2017, under the Public Official Election Act, when an individual that posted false information on the election was convicted of conducting an election crime (Chan, 2023, p. 2). Japan also has an election law, which prohibits individuals from spreading defamatory news during election campaigns (Chan, 2023, p. 3). An interesting case in a European context is France. As a result of reports of Russian interference in the French presidential election in 2017, France enacted a law in 2018 to combat disinformation during election campaigns. Law No. 2018-1202, passed on December 22, 2018, aims to fight against information manipulation. Article 15 of this law calls on online platforms and other media to implement measures to combat the spread of fake news that could disturb public order or undermine the integrity of elections (Article 11). Additionally, the law addresses the transparency of algorithms (Article 14). It allows for the suspension of activities of foreign state-controlled broadcasters in France if they are found distributing disinformation. The law also establishes a civil procedure enabling judges to order online service providers to block specific content before elections and imposes transparency requirements on online platforms (EDMO, 2022, p. 16-17). Arcom reported on implementation experiences of the law, evaluating how effective it has been since Law No. 2018-1202 was passed. Overall, Arcom asserts that the law has contributed to developing institutional capacities in France for combating online information manipulation, both within Arcom and among operators. It has aided in building and consolidating operational skills related to overseeing the measures implemented by online platforms to combat online information disorder (Arcom, 2022, p. 5).

Increasing media literacy has been proven to be an effective strategy for building societal resilience against disinformation. According to EDMO (2022, p. 29), Finland and Estonia exemplify the best policies supporting media literacy. Today, where nearly everyone in most European countries is connected to the internet and owns a smartphone, the importance of media literacy has become increasingly evident. This need is highlighted by trends such as social polarization,

Funded by the European Union

digitalization of services and consumption, climate change, and the spread of disinformation and propaganda.

In Estonia, media literacy has been integrated into the country's defense policy as part of building resilience to hybrid warfare, particularly driven by Russia. During military conflicts, social media disinformation is frequently used, and Estonia has been proactive in training its military personnel to recognize deceptive information. However, a qualitative study by Ventsel et al. (2023) revealed some potential limitations in the military media literacy training, such as difficulties in finding sources with credible pictures and references to “experts” (p. 6). Disinformation campaigns often use manipulated images or refer to so-called experts to appear more trustworthy. Therefore, despite efforts to increase media literacy, Ventsel et al. (2023) found weaknesses in this policy. EDMO also points out in their report that although media literacy is one of the most effective measures to counter disinformation, it is not sufficient on its own. They stress the necessity of supporting independent media to complement media literacy initiatives (EDMO, 2022, p. 22).

The European Commission recognizes encouraging critical thinking as one of the most important actions the EU can take to combat misinformation (European Commission, 2024, p. 2). While fact-checkers, journalists, and regulatory measures contribute to addressing misinformation, they are insufficient on their own to tackle the vast scale of the problem. Critical thinking stands out as a powerful tool to counteract the spread and influence of misinformation at the individual level. A recent project mapping existing media literacy programs across the EU found that 'critical thinking' was a focus in 403 out of 547 projects (European Parliament, 2018, p. 28). This underscores the essential role critical thinking plays in the fight against disinformation and "fake news." As a fundamental skill for media literacy, critical thinking helps individuals understand the techniques and methods used to manipulate information, enabling them to make informed judgments when confronted with misinformation (Olariu, 2022, p. 51-52). By developing these skills, individuals can better navigate the complex information landscape, making decisions based on evidence rather than assumptions or biases. Overall, critical thinking has the potential to increase awareness and build societal resilience against false information and disinformation. This paper will explore the potential of critical thinking to achieve these goals effectively while examining its limitations and impact.

2.1 AN APPROACH ON “CRITICAL THINKING”

Although the term "critical thinking" might seem self-explanatory, implying an action of critically assessing something, it encompasses a wide range of definitions and contexts. Understanding these nuances is important when addressing the concept. At its core, critical thinking can be defined as "gathering and analyzing information to make a rational judgment," with the words "analyzing" and "rational" being key to its essence, as critical thinking requires careful reasoning (Handschuh, 2023, p. 1). Contemporary perspectives propose that critical thinking is a deliberate process of reflection that involves logical reasoning (Behar-Horenstein & Niu, 2011, p. 26).

In their meta-analysis, Barak and Shahab (2023) evaluate different definitions of critical thinking and argue for one that is particularly fitting. According to this definition, critical thinking involves several key skills, including interpretation, analysis, evaluation, inference, and self-

Funded by the European Union

regulation. Interpretation is the ability to understand and convey the meaning or significance of various types of information. Analysis involves identifying relationships among concepts or other forms of representation. Evaluation refers to assessing the credibility of statements and the logical strength of inferential connections. Inference involves forming hypotheses and determining the information needed to reach sound conclusions. Self-regulation is the capacity to monitor one's cognitive activities and their outcomes, with the aim of validating or correcting one's reasoning or results (Barak & Shahab, 2023, p. 872).

2.2 CRITICAL THINKING AND EDUCATION

As mentioned in the introduction of the chapter, it is important to encourage the EU and its citizens to develop critical thinking skills. These skills could be fostered as a part of media literacy education, as traditionally media literacy has been associated with something one develops from critical thinking skills (Bulger, 2018, p. 1). The idea of media literacy education is to teach individuals how to think and not what to think (Art, 2018, p. 66). There are mainly two disciplines when it comes to how critical thinking skills should be taught. One is a general approach that aims to teach critical thinking as a stand-alone skill, while the second is a discipline-embedded approach that still teaches critical thinking within a specific context of one discipline, for example media literacy (Tiruneh et.al, 2014, p. 3). While the general approach supports the idea of "teaching how to think instead of what to think," it has a key limitation. If critical thinking is taught only within the framework of a standard subject matter course, students may struggle to identify and apply thinking skills outside that context. As a result, they may not transfer what they have learned to other situations effectively (Tiruneh et.al, 2014, p. 3). Therefore, a general approach to teaching critical thinking might not be effective to build resilience against misinformation.
Despite the high priority and goal to develop critical thinking in higher education, both instructors and students often do not receive adequate guidance on how to achieve it (Petek, 2018). It's also not clear what strategy is most effective, has the impact of the different teaching strategies are not adequately analyzed (Tiruneh et.al, 2014, p. 4). Still, there are many projects trying to focus the learning environment to foster Critical thinking skills and find teaching methods that can foster critical skills among students. Such as Handschuh (2023), who reports on a project that is lead by the students themselves at Midland College where they have created what they call "active-learning classrooms" with a more relaxed learning environment. With movable desks and whiteboards, the room itself is designed to create an active-learning environment where the students receive immediate feedback to help with any misconceptions. The project focuses on working on activities, developing a community and encouraging active learning, as an approach to develop critical thinking skills (Handschuh, 2023, p. 4). Overall, critical thinking is not a simple skill to set out to neither learn nor teach. Although, some evidence indicates that teaching strategies that directly and clearly explain critical thinking principles are more effective than strategies that teach these principles indirectly or subtly (Tiruneh et.al, 2014, p. 8), literature is still rather inconclusive on what education strategies are most effective.

Critical thinking plays a crucial role in countering "fake news" and disinformation, especially when other institutions fail to address these issues. Trust in the media is important and is built on the expectation of reliable and trustworthy information. However, Rodríguez-Pérez and

Funded by the European Union

Canel (2023) argue that trust can be dysfunctional in building resilience against disinformation (p. 33). While citizens often expect journalists to tackle disinformation, we cannot solely rely on the media to act as watchdogs against these threats. In the post-truth era, blind trust is inappropriate, and a degree of skepticism is necessary (McDougall, 2019, p. 38). Although trust in the media is valuable, blind faith can decrease resilience to misinformation. Lower media legitimacy and trust are associated with greater resistance to misinformation. Citizens who approach the media with pragmatic skepticism are more resilient to misinformation (Kyriakidou et al., 2022). To prevent outright distrust of traditional media, the media should be more transparent about their sources, potential biases, and methods. This transparency would allow citizens to critically assess the information provided, fostering a pragmatic skepticism (Kyriakidou et al., 2022, p. 37). By increasing transparency, the media can encourage critical thinking while maintaining fundamental trust in legacy media.

Critical thinking involves self-regulation, which includes monitoring and controlling our emotional biases. Self-regulation was included as one of the abilities involved in our definition of critical thinking. This ability helps individuals enhance their cognitive skills and reduce emotional biases (Barak & Shahab, 2023, p. 872). Weeks (2015) found that anger and anxiety are emotions that could lower our belief accuracy, give more partisan tendencies, which makes individuals more vulnerable to believing in misinformation. Self-regulation could particularly in politically divisive topics reduce our vulnerability to misinformation. Polarization could lead to so called “filter-bubbles”, as increased personalized content online strengthens already our beliefs and world view, which could limit hearing counter arguments or different perspectives, which again could even effect voting patterns (Georgiadou et.al, 2018, p. 55). Increasingly are particularly young people only receiving their news on social media, potentially being even more vulnerable to “filter bubbles”. Furthermore, Artificial intelligence also falls victim to these as algorithmic biases could limit our analytical perspectives and reinforce our own personal biases (Darwin et.al, 2024, p. 5). Both these issues underscore the importance of self-regulating our emotions as a part of our critical thinking skills and minimize the power of anger and fear when consuming news online. Further research projects on critical thinking should focus more on how self-regulation and critical assess something detached from one’s emotions, as this becomes even more important with increased social media use and the potential impact this has on voting patterns in elections.

Critical thinking is crucial in combating misinformation and disinformation, as emphasized by the European Commission and various media literacy initiatives across the EU. It equips individuals with essential skills to analyze, evaluate, and interpret information, enabling them to make informed judgments. Educational strategies for fostering critical thinking include both general and discipline-embedded approaches, each with their own strengths and limitations. The general approach supports broad application but may struggle with skill transfer across contexts. Critical thinking also involves maintaining healthy skepticism towards media credibility, crucial in the post-truth era to enhance resilience against misinformation. Self-regulation, a core aspect of critical thinking, aids in overcoming personal biases and managing emotions, reducing vulnerability to misleading content. Ultimately, developing critical thinking skills is vital for building societal resilience and fostering a more informed public.

Funded by the European Union

2.3 REFERENCES

Arcom. (2022). Manipulation of information: Implementation review 2018-2022. https://www.arcom.fr/sites/default/files/2022-12/Manipulation%20of%20information%20-%20Implementation%20review%202018-2022.pdf

Art, S. (2018). Media literacy and critical thinking. *International Journal of Media and Information Literacy*, *3*(2), 66-71. URL: https://cyberleninka.ru/article/n/media-literacy-and-critical-thinking

Barak, M., & Shahab, C. (2023). The conceptualization of critical thinking: Toward a culturally inclusive framework for technology-enhanced instruction in higher education. *Journal of Science Education and Technology*, *32*(6), 872-883. Retrieved from: https://doi.org/10.1007/s10956-022-09999-4

Behar-Horenstein, L. S., & Niu, L. (2011). Teaching critical thinking skills in higher education: A review of the literature. *Journal of College Teaching & Learning (TLC)*, *8*(2).

Bulger, Monica, and Patrick Davison. (2018). The promises, challenges, and futures of media literacy. *Journal of Media Literacy Education* 10.1: 1-21. Retrieved from: https://doi.org/10.23860/JMLE-2018-10-1-1

Chan, E. (2023). Analysis of the Challenge in Fake News and Misinformation Regulation Comparative in Global Media Landscape. In *SHS Web of Conferences* (Vol. 178, p. 02018). EDP Sciences.

Claussen, V. (2018). Fighting hate speech and fake news. The Network Enforcement Act (NetzDG) in Germany in the context of European legislation. *Media Laws*, *3*(3), 110-136.

Darwin, Rusdin, D., Mukminatien, N., Suryati, N., Laksmi, E. D., & Marzuki. (2024). Critical thinking in the AI era: An exploration of EFL students' perceptions, benefits, and limitations. Cogent Education, 11(1), 2290342. Retrieved from: https://doi.org/10.1080/2331186X.2023.2290342Page%205%20of%2018

European Commission, Directorate-General for Communication, Tackling disinformation and information manipulation, Publications Office of the European Union, 2024, Retrieved from: https://data.europa.eu/doi/10.2775/87640

European Digital Media Observatory. (2022). Policies to tackle disinformation in EU member states – Part II. https://edmo.eu/wp-content/uploads/2022/07/Policies-to-tackle-disinformation-in-EU-member-states-%E2%80%93-Part-II.pdf

European Parliament, Directorate-General for Internal Policies of the Union, Renda, A. (2018). The legal framework to address "fake news" : possible policy actions at the EU level : in-depth analysis, European Parliament. Retrieved from: https://data.europa.eu/doi/10.2861/468200

Flood, A. (2017, November 2). 'Fake news' is very real: Word of the year for 2017. The Guardian. https://www.theguardian.com/books/2017/nov/02/fake-news-is-very-real-word-of-the-year-for-2017

Georgiadou, E., Rahanu, H., Siakas, K. V., McGuinness, C., Edwards, J. A., Hill, V., ... & Knezevic, R. (2018). Fake news and critical thinking in information evaluation. *Limerick Institute of Technology (Ireland)*, *21*, 50.

Harro-Loit, H., Lõhmus, E., & Loit, U. (2023). Capability of Monitoring Media Related Competences of the Public in Estonia. *Media Literacy and Academic Research*, *6*(2), 5-21.

Handschuh, K. (2023). Critical Thinking and Media Literacy in an Age of Misinformation. Retrieved from: http://doi.org/10.33774/apsa-2023-l43bk

Jiménez Durán, R., Müller, K., & Schwarz, C. (2023). The Effect of Content Moderation on Online and Offline Hate: Evidence from Germany's NetzDG. *Available at SSRN 4230296*.

Kyriakidou, M., Morani, M., Cushion, S., & Hughes, C. (2022). Audience understandings of disinformation: Navigating news media through a prism of pragmatic scepticism. Journalism. Advance online publication. Retrieved from: https://doi.org/10.1177/14648849221114244

McDougall, J. (2019). Media literacy versus fake news: critical thinking, resilience and civic engagement. *Media studies*, *10*(19), 29-45. Retrieved from: https://doi.org/10.20901/ms.10.19.2

Niza, I. H., Mawarpury, M., Sulistyani, A., & Rachmatan, R. (2022). *Critical thinking ability and information literacy in identifying fake news on social media users* (Doctoral dissertation, Universitas Ahmad Dahlan). Retrieved from:

Olariu, O. (2022). Critical Thinking as Dynamic Shield against Media Deception. Exploring Connections between the Analytical Mind and Detecting Disinformation Techniques and Logical Fallacies in Journalistic Production. LOGOS, UNIVERSALITY, MENTALITY, EDUCATION, NOVELTY. Section Social Sciences, 11(1), 29-57.

Petek, E. (2018). Critical Thinking as a Nourishing Interface to EFL Context in Higher Education. *International Education Studies*, *11*(5), 1-13. Retrieved from: https://doi.org/10.5539/ies.v11n5p1

Rodríguez-Pérez, C., & Canel, M. J. (2023). Exploring European citizens' resilience to misinformation: Media Legitimacy and Media Trust as predictive variables. *Media and Communication*, *11*(2), 30-41. Retrieved from: https://doi.org/10.17645/mac.v11i2.6317

Santuraki, S. U. (2020). Anti-fake News Legislations and Free Speech: A Comparative Evaluation of the Trends in Germany, Malaysia, and Kenya. In *Proceedings of the International Law Conference (iN-LAC 2018)-Law, Technology and the Imperative of Change in the 21st Century* (pp. 296-305).

Smith, R. B., Perry, M., & Smith, N. N. (2021). 'Fake News' in Asean: Legislative Responses. *Asean: Legislative Responses (June 18, 2021). Smith, RB, Perry, M., & Smith, NN*, 117-137.

Smith, R., & Perry, M. (2020). " Fake News" Legislation in Thailand: The Good, the Bad and the Ugly. *Athens JL*, *6*, 243.

Tan, R. (2023). Legislative strategies to tackle misinformation and disinformation: Lessons from global jurisdictions. *Australasian Parliamentary Review*, *38*(2), 231-250.

Tiruneh, D. T., Verburgh, A., & Elen, J. (2014). Effectiveness of critical thinking instruction in higher education: A systematic review of intervention studies. In Higher Education Studies (Vol. 4, Number 1, pp. 1–17). Canadian Center of Science and Education. https://doi.org/10.5539/hes.v4n1p1

Ventsel, A., Hansson, S., Rickberg, M., & Madisson, M. L. (2023). Building Resilience Against Hostile Information Influence Activities: How a New Media Literacy Learning Platform Was Developed for the Estonian Defense Forces. *Armed Forces & Society*, 0095327X231163265.

Weeks, B. E. (2015). Emotions, partisanship, and misperceptions: How anger and anxiety moderate the effect of partisan bias on susceptibility to political misinformation. *Journal of communication*, *65*(4), 699-719. Retrieved from: https://doi.org/10.1111/jcom.12164

Funded by the European Union

3 IDENTIFICATION OF EFFECTIVE INSTRUMENTS COUNTERING DISINFORMATION - Alessia D'Andrea, Arianna D'Ulizia

Prompted by the lack of regulations in other Western democracies, the EU and its member states have been actively developing policies and initiatives to tackle disinformation. These efforts focus on safeguarding democratic processes, protecting citizens, and promoting media literacy. These policies and initiatives reflect the EU's commitment to addressing the multifaceted challenge of disinformation and protecting democratic values in the digital age. They differ from other laws on disinformation, such as those adopted in Malaysia or Singapore, as they do not involve preventive or reactive censorship except in cases of "incitement to hate or crime". These initiatives are strengthened by the approval of regulations on disinformation in most EU member states, which complement the EU regulatory framework. It's important to note that the EU's regulatory approach has also enabled closer cooperation among member states in cybersecurity and joint efforts to counter disinformation. We observe an ongoing struggle between EU institutions and major internet platforms to find the best approach to tackle disinformation. Although all platforms submit yearly plans, the debate between regulation and self-regulation continues, with further developments expected in the coming years.

The EU has employed a comprehensive strategy that includes developing guidelines and recommendations for its member states, as well as implementing its own regulations and initiatives to curb the spread of false or misleading information. This multifaceted approach reflects the EU's commitment to addressing disinformation on multiple fronts. In this review, we will examine the EU's various efforts and initiatives, assess some criticisms, and evaluate the effectiveness of these measures in countering the pervasive threat of disinformation across the digital landscape.

3.1 INFORMATION MANIPULATION AND DEMOCRACY

"What's on your mind?" This is the question that 3 billion people around the world see daily on their Facebook walls, a question they often answer, exercising their freedom of expression. It is precisely in this question, and the ability to answer it, that lies a crucial issue democratic political systems must confront in their fight against information manipulation.

Let's start at the beginning. At the dawn of the digital age, the desire to support technological evolution, along with immense trust in an inherently democratic and pluralistic web, led States to refrain from implementing strict regulation for the growth of online platforms. Giants like Google, Amazon, and Meta took advantage of regulations that existed in traditional sectors but weren't effectively applied to them, allowing these companies to expand and solidify dominant positions in the economic market. This situation inevitably translated into political influence. The growing influence of digital platforms and their collateral effects led governments to recognize the need to regulate the power wielded by these platforms (Hassan & Pinelli, 2022). The regulation of the digital sector touches on many aspects of contemporary society. In this context, however, we will focus on the communication domain, specifically on the challenges the European Union faces in attempting to develop an appropriate regulatory framework for this sector.

Despite the European Constitution guaranteeing every individual the right to express their opinion, for many years, the ability to reach a broad audience was the privilege of a few people, giving them the power to influence and shape public opinion. This made the regulation of the information sector

Funded by the European Union

a shared responsibility between the State and the editorial and journalistic (Pitruzella, 2018) sectors. In this regard, the European Court of Human Rights (ECHR, 2021), within the scope of Article 10 of the European Convention on Human Rights, stipulates that the protection granted to journalists in reporting on matters of public interest is "conditional upon the fact that those concerned act in good faith based on accurate facts and provide 'reliable and precise' information in accordance with journalistic ethics". Therefore, ECHR case law highlights the importance of setting limits on freedom of expression to ensure the right to information, whose abuses can lead to criminal sanctions, such as in cases of defamation. Another key element in traditional information regulation, based on the state's role and the private traditional media sector, was ensuring informational pluralism, enshrined in Article 11 of the Charter of Fundamental Rights of the European Union, which states in paragraph 2, "The freedom and pluralism of the media shall be respected" (European Union, 2012).

The rise of digital platforms as new information media has profoundly restructured the communication paradigm. Previously, the information model was characterized by a one-way flow, where a single sender transmitted information to a large audience. However, in the current digital context, this paradigm has transformed into a "many-to-many" (n ↔ n) communication model, where every user is not only a recipient of messages but also has the ability to act as a sender. Although the growing diffusion of social networks and digital platforms has undoubtedly contributed to promoting informational pluralism, the lack of adequate regulation has simultaneously facilitated the massive emergence of illegal content, hate speech, and, not least, an unprecedented proliferation of information manipulation. Focusing on the latter aspect, it is evident that this phenomenon has urgently entered the European political agenda. In fact, digital platforms have become essential spaces for shaping public opinion; thus, the distortion of information flows entails an intentional attempt to influence public opinion, with significant repercussions on states' political agendas (Giusti, 2023). This problem is certainly not limited to the European Union but transcends its borders, much like the vehicle through which it travels. While totalitarian regimes can more easily defend themselves from this threat through direct control of communication channels, democratic systems must necessarily find effective solutions without compromising fundamental individual rights, chief among them being freedom of expression.

This right is guaranteed by Article 11 of the Charter of Fundamental Rights of the European Union and Article 10 of the ECHR. These articles reflect, at the European level, what is established by the First Amendment of the American Constitution. It is precisely the First Amendment of the American Constitution that Facebook CEO Mark Zuckerberg evoked in 2019, by Facebook CEO, Mark Zuckerberg, in response to growing pressures for increased accountability of platforms in managing disinformation. Zuckerberg stated: "In principle, in a democracy, I believe that people should decide what is credible, not tech companies". Yet, despite such claims, in the same period Facebook had already employed around 35,000 fact-checkers to verify the accuracy of information shared on the platform during the same period. This suggests that the appeal to the First Amendment was primarily a strategy to maintain a distance between digital platforms and public authorities' interventional strategy that can be applied by critics of platform regulation to protect the possibility of information manipulation itself (Hassan & Pinelli, 2022).

Delving into this right, Article 10 of the ECHR reads: "Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers". This article clearly shows that freedom of expression, as enshrined in both the ECHR and the Charter, can be considered in part a negative right, meaning that it imposes an obligation of non-interference on the state. Therefore, direct action by public authorities against disinformation risks being immediately interpreted and labeled as censorship.

In this sense, it is important to remember that the constitutional history of public authorities is marked by a long process of regulatory evolution aimed at establishing a system of regulation to prevent the recurrence of past abuses of power. This creates a collective perception of the State as an enemy, rather than an ally, in promoting individual freedom (Lakoff, 2014). Conversely, the private sector is often

Funded by the European Union

perceived as a key player in the liberal context, embodying the ultimate realization of individual freedom. The view of the State as the enemy of the individual is a narrative framework that can be easily activated by those seeking to undermine public trust in government institutions, particularly in the context of disinformation regulation, where destabilizing methods find their primary instruments of action. However, government entities cannot shy away from ensuring the well-being of a democratic society. Article 10 of the ECHR also states that freedom of expression may be subject to legitimate restrictions, provided they are prescribed by law and necessary in a democratic society.

Considering that a democratic society is founded on the full realization of individuals' fundamental rights and that freedom of expression materializes in the pluralism of opinions, from which public opinion emerges and guides government policies, it is clear that there is an essential need to protect and regulate a digital context that has so far been insufficiently governed and frequently exploited as a powerful tool of manipulation. The growing awareness of digital platforms' power and technological and informational superiority, combined with their operation in an international context, has led the European Union to recognize these entities as the main actors in controlling information manipulation.

However, delegating a form of regulatory power to these platforms raises significant concerns. Granting private entities the authority to censor or moderate informational content, without clear transparency and without clear appeal mechanisms, risks compromising the protection of fundamental rights. This includes not only freedom of expression but also data protection and the integrity of the information itself. The Venice Commission has highlighted the limitations of existing measures, noting that relying on private entities to safeguard fundamental rights can be inadequate (Hassan & Pinelli, 2022). This concern intersects with the issue of information modes since, while platforms are not comparable to traditional publishers, they operate through algorithms that influence the visibility and accessibility of content. This reality, known as the "algorithmic society" (Balkin, 2018), raises crucial questions about the actual protection of the right to be informed and the quality of the information itself. At the same time, public authorities' intervention in regulating disinformation risks fueling fears of excessive control, evoking the specter of a "ministry of truth" (Magnani, 2021). Moreover, overly invasive state control could interfere not only with freedom of expression but also with private companies' right to operate in a free market, protected by Article 16 of the Charter of Fundamental Rights of the European Union. More specifically, digital platforms benefit from the eCommerce Directive, which establishes a form of exemption from liability for "content providers" (Bassini, 2019). However, it is important to remember that freedom of expression, often invoked as an argument against public authorities' intervention in regulating online information, as well as the right to a free market, are dynamic rights. Their existence depends on their ability to adapt to the circumstances and changes in political and social contexts. It is within this delicate and complex balance that the European Union has embarked on a decade-long journey to combat disinformation while protecting the democratic society it represents.

3.2 INITIATIVES BY GOVERNMENTAL INSTITUTIONS AND PRIVATE STAKEHOLDERS

The necessity for the European Union to adopt rigorous measures to fight disinformation began to emerge in 2014, after Crimea became part of the Russian Federation. In this situation, disinformation started to appear as a threat to the security of the European Union and, as such, was included in official documents as a "hybrid threat". It is in fact in the Conclusions of the European Council of 2015, followed by a Communication from the European Commission (2016) the subsequent year, that we read for the first time: "Massive disinformation campaigns, using social media to control the political narrative or to radicalise, recruit and direct proxy actors can be vehicles for hybrid threats. (…) Perpetrators of hybrid

threats can systematically spread disinformation, including through targeted social media campaigns, thereby seeking to radicalise individuals, destabilise society and control the political narrative".

Framing disinformation as a tool of a "sharp power" strategy (Giusti, 2023) had already been declared by Russia itself. In 2013 Russian General Valery Gerasimov stated in a speech, later reported in a Russian military magazine, that "the role of non-military means to achieve political and strategic goals has grown. In many cases, such means have surpassed the effectiveness of weapons. This intervention suggested a renovation of Russian strategies, oriented to exploit the opportunities offered by the Internet. This approach culminated in the creation of education and research dedicated to the analysis and use of information as a weapon, coordinated by the Federal Security Service. The outcoming strategy was later described by scholar Ben Nimmo through the categories of 4Ds: deny, distort, diminish, distract. (Singer & Brooking, 2018).

The growing awareness of information manipulation as part of an attack aimed at generating political imbalances in foreign states has led to the implementation of security-oriented initiatives, aimed at external agents. The first significant measure of the European Union in this context was the creation of the East StratCom Task Force, established not coincidentally within the EEAS. This task force is responsible for developing strategic communication and intercepting and preventing pro-Kremlin disinformation, especially in the Eastern Partnership countries, which are particularly exposed to this threat. The task force is composed of a group of multidisciplinary professionals, and one of the main tools created was EUvsDisinfo[1]. This tool represents the most direct and pragmatic response to the guidelines of the leaders of the European Union. EUvsDisinfo is the largest open-source database currently available on pro-Kremlin disinformation, containing over 15,000 examples of such procedures, collected from 2015 to date. The database allows the identification of recurring themes of disinformation, facilitating their recognition and providing study material to understand their modalities. Furthermore, EUvsDisinfo provides the public with media literacy tools, which are also open to the consumer, to independently recognize disinformation, basing its strategy not only on data collection and analysis, but also on information and media education. With the same purpose, on the website, we can find a section called LEARN[2], which illustrates the key mechanisms of disinformation and offers resources and answers to acquire further skills. Over time, the East StratCom Task Force has increased in its relevance, consolidating its 2015 mandate, to the point that it is now part of the broader EEAS "Strategic Communication, Task Forces and Information Analysis" Division. This division helps the European Union to deal with the different aspects of FIMI, including disinformation, not only in neighbouring countries but also globally (EEAS, 2022). A key element is the extension of the action range of this task force, which no longer focuses only on fighting the disinformation threat from Russia but has also extended its attention to that from China (EUvsDisinfo, 2023 July 5). The infodemic resulting from the COVID-19 pandemic has highlighted the evolving nature of the disinformation phenomenon, characterised by blurred and undefined outlines, capable of constant adaptation to new developments. Therefore, counter strategies must be flexible and ready to stay updated, in order to promptly address new emerging challenges.

Another tool developed within the EEAS in 2019, in preparation for the European elections, is the RAS. This system aims to rapidly connect all EU Member States, EU institutions, digital platforms and fact-checkers, ensuring quick and coordinated communication in response to threats of information manipulation. The RAS is an important testimony of the need for a multilateral approach, based on the exchange of information and coordinated responses between States, to effectively contrast the phenomenon.

[1] https://euvsdisinfo.eu/
[2] https://euvsdisinfo.eu/learn/

Funded by the European Union

The inclusion of disinformation among hybrid threats and, consequently, in a securitization plan in international geopolitics implies an emergency treatment of the issue, which allows the application of extraordinary procedures capable of compromising democratic principles. An example of this are the extraordinary measures adopted in relation to the war in Ukraine. In this context, the European Union has introduced restrictions against Sputnik and RT, two of the main international Russian broadcasters, blocking their transmission on all platforms, including cable channels, satellite, internet and mobile applications. However, it is essential to underline that these restrictions do not prevent these media from continuing to carry out research or interview activities. In this too, the multi-actor approach has proven to be successful, involving not only European institutions, but also digital platforms. YouTube, Facebook and TikTok have obscured the social profiles associated with these Russian broadcasters. Apple and Microsoft have removed the possibility of downloading their applications, while Twitter warns users about links that lead to Russian sites. TikTok has suspended uploading videos from Russia and live streaming, and Google has stopped its advertising activities in Russia (Giusti, 2023). In this context it is certainly significant to underline how Ukraine has used communication channels to its advantage to create alliances and consolidate its position. Ukraine's approach to strategic communication is a further sign of how this has now become an essential factor in hybrid war operations, playing a decisive role in shaping narratives and influencing public opinion on a global level.

But if disinformation, understood as a form of "hybrid threat", can give rise to extremely rigid countermeasures for a democratic system, how should we deal with all that unreliable news that do not appear as such? And still, when is a case of disinformation attributable to a hybrid warfare strategy and when is it not? In a communication from the European Commission (2018) to other European institutions in December 2018, we read: “The actors behind disinformation may be internal, within Member States, or external, including state (or government sponsored) and non-state actors. (…) disinformation by the Russian Federation poses the greatest threat to the EU. It is systematic, well-resourced, and on a different scale to other countries. In terms of coordination, levels of targeting and strategic implications, Russia's disinformation constitutes part of a wider hybrid threat that uses a number of tools, levers, and also non-state actors”.

In this text, disinformation, as a part of a hybrid warfare strategy, is designed with the intent of undermining the political balances of the targeted States and is managed and financed by state actors. However, disinformation, in its broadest sense, as stated in this communication and widely demonstrated during the COVID-19 emergency, can also be generated by individuals or non-state entities with other aims, for instance economic. In these cases, its harmful impact may not concern the political sphere but other aspects of society, such as health or environmental protection (European Court of Auditors, 2021). Therefore, when cases of information manipulation do not fall into the category of “hybrid threats”, what strategies does the European Union use? The European Union has tried to provide a defined answer to this question since 2018. Until then, in fact, disinformation had been treated exclusively as a foreign threat or had been partially addressed, recurring to regulations about issues that, although related, did not explicitly face it; in this regard, we can mention EU multistakeholder Code of Conduct on illegal online hate speeches (May 2016) and the Communication from the European Commission on addressing illegal content online (September 2017)[3]. In fact, the Code of Practice on Disinformation was published in 2018,

[3] For a complete overview of all EU initiatives that directly mention disinformation or implicitly address it from 2015 to 2020, see Meyer T., Marsden C. T., & Brown I. (2021). *Regulating Internet content with technology: Analysis of policy initiatives relevant to illegal content and disinformation online in the European Union*. In Disinformation and digital media as a challenge for democracy, 101-118. Cambridge University Press.; For a comprehensive overview of all European Union initiatives specifically addressing disinformation up to 2024, visit https://commission.europa.eu/topics/strategic-communication-and-tackling-disinformation_it

Funded by the European Union

the same year as the previously mentioned communication, the Action Plan Against Disinformation, which for the first time introduced the term "disinformation" in an official document of the European Union.

The Code of Practice on Disinformation marks a turning point for the European Union, starting to give responsibility to digital intermediaries that, until then, had mainly maintained a position of non-responsibility. The 2018 code, in fact, officialises the commitment voluntarily undertaken by the signatories (such as Google, Facebook, Microsoft etc., but also advertisers and other players in the technology sector) to actively contribute to the fight against and prevention of disinformation. Specifically, the code is articulated into 21 commitments divided into five main areas. The first, Scrutiny of ad placements, aims to monitor advertisements so that they do not support sites spreading false information; the second, Political advertising and issue-based advertising, aims to ensure transparency and regulation of political advertising; the third area, Empowering consumers, aims to promote greater media education, encouraging informed participation by consumers; the fourth, Integrity of services, focuses on closing fake accounts and removing automated bots; finally, the fifth area, Empowering the research community, aims to create a multi-actor network to fight disinformation, involving the research community and a fact-checking network. Although the code was officially presented as a voluntary initiative of digital intermediaries, it is more correct to define it as a co-regulatory document rather than a self-regulatory one. This is because, although it is not the result of a binding directive of the European Union, it was clearly promoted by a strong institutional request. This request emerged after the events of 2016, when disinformation had a significant impact on fundamental democratic processes, such as the presidential elections in the United States, with the victory of Donald Trump, and the Brexit referendum in the United Kingdom (Stocchetti, 2021; Giusti 2023).

After the two evaluation reports of the Code, carried out by the European Commission in 2019 and 2020, the Commission, in 2021, presented a guide with the aim of providing indications to improve the Code itself. In particular, the guide highlighted the need for greater accountability from all signatories, the need to frame more structured and cohesive measures, overcoming the limitations of a voluntary approach, and the definition of more precise KPIs, capable of ensuring effective monitoring (European Commission, 2021). The guide led, on 16 June 2022, to the signing of the Strengthened Code of Practice on Disinformation, with the aim of filling the gaps of the previous one and addressing disinformation more incisively. Among the differences between the two codes, we can highlight those aimed at strengthening cooperation with the academic community and fact-checkers, as well as the integration of advanced technologies, such as artificial intelligence (AI), to address emerging challenges. Furthermore, the code highlights the need for more rigorous transparency and reports. However, the most significant change of code compared to the previous one is that it is supported by the Digital Services Act (DSA), the first regulatory document of the European Union related to disinformation. The combination of the Code and the DSA allows us to establish a balance between obligations and flexible operating methods, capable of adapting to the differences of individual platforms and complying with the e-commerce directive (Hassan & Pinelli, 2022). The DSA takes an “asymmetric” approach, imposing more rigorous obligations only to platforms with particularly large audiences, which therefore imply a greater risk of social and economic influence. The DSA aims to protect users of such platforms, emphasizing the need for transparency in actions against disinformation by Very Large Online Platforms (VLOPS). At the same time, it ensures supranational regulatory uniformity, addressing the problem of fragmented national initiatives (Stocchetti, 2021) that struggle to respond to global challenges. Another significant aspect concerns the possibility, in exceptional cases, for competent authorities to access data, for example in the context of investigations into specific behaviours. Although DSA may initially appear limited in terms of strict obligations, allowing considerable leeway to platforms, this can be interpreted as a strength in an asymmetric relationship, since VLOPs operate on a much higher plane with regard to information and technology, creating a balance between freedom of expression and the need for regulation. In an interview with Zorloni (2024 Sept 12), Roberto Viola, head of the General Directorate Connect of the European Commission, explained that “all

regulations have a processing cycle that does not last only a few months. It takes at least a couple of years to activate them". In the case of the DSA, "a fundamental element that is not yet fully in force is the audit algorithm", that is an external control of the platforms' algorithms, essential to understand how the data is used. Viola added: "Now we are entering this phase; the DSA involves an audit of the algorithmic recommendation systems by an independent company".

Viola's observations clearly suggest that a revolutionary process takes time, and only through constant efforts and monitoring is it possible to evaluate its actual effectiveness and identify the weaknesses to address. However, the DSA has been tested during this year's European elections, where no systemic attack was recorded, allowing the Commission not to activate emergency procedures (Zorloni, 2024 Sept 12). According to the European Digital Media Observatory, this may be due to the rapid identification of threats and greater attention to the phenomenon of disinformation. In this first year, therefore, the DSA seems to have initiated a significant change, also highlighted by the processes implemented by digital platforms. Although some of them had already undertaken paths of transparency and control, as in the case of the Facebook Oversight Board[4], the DSA has made transparency reports and anti-disinformation actions more systematic; moreover, it has strengthened collaboration with fact-checking networks, has implemented reporting systems for users, increased the visibility of reliable news and created media literacy tools[5].Despite the ambitious ongoing project, it is essential to underline that changes in the digital age occur at a significantly faster pace than the attempts to regulate them. An example is the recent European Union law on artificial intelligence (AI Act), which expects a two-year implementation period (European Commission, 2024 October 10). The significant progresses made by the European Union aim to address existing problems, but it is right to question the possibility of preventive approaches. To this end, it is necessary to turn our attention to the third actor in the field: the citizen.

3.3 THE ROLE OF CITIZENS

Focusing on the initiatives seen so far, the strategies realized at European level, followed by those of digital platforms, are aimed at contrasting a phenomenon that exists. The European Union, like other actors in this field, intervenes *ex-post* to define ways to combat the phenomenon. This means that the entities involved are always one step behind emerging threats, as demonstrated by deepfakes, helped by the growing diffusion of platforms of AI generated content. These tools that can be used to manipulate information have alarmed the institutions, which have reacted with the AI Act, in order to prevent abuses in the use of AI. It is in this context that the third player in question assumes a leading role: the individual that, in this context, corresponds to the "user". Therefore, the latter is the person towards whom the disinformation is directed and also the person for whom every effort of protection is created.

The importance of this "third actor" is highlighted in European documents from the very beginning, specifically it is present in the 2018 report of the High-Level Expert Group (HLEG), which is the document that started all the reflections that followed until today. Among the recommendations of the HLEG, in fact, we can read: "The multi-dimensional approach recommended by the HLEG is based on a number of interconnected and mutually reinforcing responses. These responses rest on five pillars designed to: (…) 2. promote media and information literacy to counter disinformation and help users navigate the digital media environment; (…) Additional measures aimed at strengthening societal

[4] The Facebook Oversight Board is the body established by Meta to review and assess content moderation decisions on Facebook and Instagram [https://www.oversightboard.com/]
[5] An example of this is the transparency section of Meta, available at https://transparency.meta.com/

Funded by the European Union

resilience in the longer term need to be implemented in parallel. Therefore, the HLEG recommends a set of complementary measures. These measures are designed to support the diversity and sustainability of the news media ecosystem on the one hand. On the other hand, they are designed to develop appropriate initiatives in the field of media and information literacy to foster a critical approach and a responsible behaviour across all European citizens" (European Commission, Directorate-General for Communication Networks, Content and Technology, 2018).

Therefore, the High-Level Expert Group underlines the importance of developing control tools for users and the urgence to start initiatives related to media and information literacy. This recommendation is repeated in various European Union documents aimed at countering information manipulation, and it is particularly supported by the European Digital Media Observatory (EDMO)[6]. In particular, the EDMO creates teaching materials and educational resources, organises seminars and training courses open to different groups of the population, and starts awareness campaigns to increase the understanding of the risks associated with disinformation. Among its missions, EDMO aims to train citizens to be aware and capable of recognizing disinformation mechanisms, with the support of a multidisciplinary network composed of fact-checkers, media literacy experts, and academic researchers in collaboration with media organisations, online platforms and media literacy practitioners.

Still in order to protect the user and actively involve him in the fight against disinformation, the pandemic of harmful information - which emerged during the COVID-19 emergency - has marked significant progress in the creation of projects dedicated to verifying the truthfulness of news. With the foundation of the International Fact-Checking Network (IFCN), we also see the birth and consolidation of media and specialized platforms, including Pagella Politica, Full Fact, and Snopes (Casero-Ripollés, et al., 2023), as well as tools such as ClaimBuster, Hoaxy and the most recent InVID, which deals with the authenticity of videos[7]. Another open tool, although used mostly for research purposes, was CrowdTangle, an important resource for the fight against disinformation, which however was closed last August[8]. This platform has been replaced by the Content Library and API, now only available for researchers and non-profit organizations upon request[9].

The tools presented here, together with the sections dedicated to media literacy, presuppose the presence of an active and rational citizen, not only aware of the problem of disinformation, but also committed to its resolution. However, this ideal of citizens seems to be far from reality. The individual we are dealing with today in this fight is, in fact, a person who makes quick decisions, mainly guided by emotions rather than critical thinking, and used to consuming short and immediate news. This tendency makes the individual exposed to information manipulation, which exploits emotional levers and polarizing logic, amplified by the algorithms of social networks (Quattrociocchi & Vicini, 2023; Rubinelli et al., 2020). It is significant to notice that, within the transparency initiatives of major digital platforms such as Meta, access to the algorithms that determine the selection of news continues to be limited. However, it is now certain that these algorithms use users' confirmation bias, showing them content that is in line with their value system, thus reinforcing it (Sunstein, 2017; Quattrociocchi & Vicini 2023). This process stimulates a form of gratification that keeps the users in their comfort zone, reducing their tendency to seek information that does not confirm their beliefs. Although we tend not to compare algorithmic selection to an editorial decision, it is clear that this dynamic makes choices instead of the user, making them basically a passive subject in the decision-making process regarding information.

[6] https://edmo.eu/
[7] For more information visit https://www.rand.org/research/projects/truth-decay/fighting-disinformation/search.html
[8] Confirming the functioning of the DSA seen in the previous paragraph, the decommissioning of CrowdTangle without a valid alternative is one of the reasons why the European Commission has started an investigation to verify whether Meta violated the DSA during the European elections. [https://ec.europa.eu/commission/presscorner/detail/it/ip_24_2373]
[9] https://transparency.meta.com/it-it/researchtools/meta-content-library/

Funded by the European Union

The structure of the usage of digital platforms must be placed at the centre of the European debate on policies against disinformation, since the main form of prevention against this and other threats to democratic systems is undoubtedly represented by a free and informed individual, a condition that the functioning of platforms seems to hinder. As highlighted by the study by Brendan Nyhan and Jason Reifler (2010), addressing a fake news with fact-checking tools or, in some cases, with debunking, does not automatically eliminate the cognitive perception of that news as true. Algorithmic logics tend to hit a target predisposed to believe in such news, and disconfirmation could cause a "backfire effect" rather than solve the problem, reaffirming one's position and even discrediting the debunking work[10]. This makes us understand that the problem of disinformation is much more complex and systemic than a mere distinction between "foreign threat" and not, or between true and false, and must be deconstructed taking into consideration its complexity. In fact, although counter measures can detect more easily foreign disinformation campaigns, automated content or visual manipulations, it is more difficult to identify false information when protected by freedom of expression, which no longer transmits single opinions, but a variety of "truths". The polarizing reality of digital platforms, together with other systemic factors, has fuelled a "market of truth" (Nicita, 2021) rather than ideas, which no longer favours an open and dialogic debate based on shared and shareable facts, but instead promotes a conflict between "us" and "them".

The effort to guarantee free expression and free market seems to have obscured the importance of preserving the right to receive and seek information. The user, even when trying to emancipate himself from algorithmic logic, must face an increasingly polarized reality, in which it is becoming more difficult to find impartial and reliable information. The mainstream media have undergone significant transformations in recent years, influenced by the crisis caused by the emergence of the Internet. In order to adapt to a demand oriented towards extreme and divisive content, these platforms have often become amplifiers of unreliable news, capable of attracting the public's attention (Stocchetti, 2021). In this context, it is crucial to observe how the threat to plural information does not come from direct censorship, but rather from its exact opposite (Nicita, 2021). In this sense, freedom of expression, for which so much is being done, seems almost threatened by its own protection. In fact, freedom of thought, essential to fully exercise the right to freedom of speech, is hindered by the difficulty of accessing reliable and impartial information, which is the basis of free and critical thought.

Considering what has been said so far, it is necessary to underline how only training informed and aware individuals represents the true tool to confront a threat that is constantly changing its shape. In order to promote the ability to make informed choices in the digital world on a daily basis, it essential to reflect on a media education that does not only consider threats, but also the dynamics that make the user passive in contexts where, on the contrary, he or she thinks of being a protagonist. Because a substantial change, and not an only formal one, aimed at caring for a democratic system can only start from the citizen.

[10] One example is the false information regarding former President Barack Obama's non-U.S. citizenship, which despite being denied, has persisted.

Funded by the European Union

3.4 REFERENCES

Balkin, J. M. (2018). Free speech in the algorithmic society: Big data, private governance, and new school speech regulation. In Yale Law School, 51, 1149- 1195 [https://openyls.law.yale.edu/handle/20.500.13051/4699]

Bassini, M. (2019). Internet e libertà di espressione. Prospettive costituzionali e sovranazionali. Aracne.

Casero-Ripollés, A., Tuñón, J., & Bouza-García, L. (2023). The European approach to online disinformation: Geopolitical and regulatory dissonance. In Humanities and Social Sciences Communications, 10(1), 657. [https://doi.org/10.1057/s41599-023-02179-8]

ECHR European Court of Human Rights. (2021). Guide on Article 10 of the European Convention on Human Rights: Freedom of expression. [https://www.echr.coe.int/documents/guide_art_10_eng.pdf]

EEAS European External Action Service. (2019) Questions and Answers about the East StratCom Task Force. [https://www.eeas.europa.eu/node/59644_en]

EEAS European External Action Service. (2022). 2022 Report on EEAS activities to counter FIMI. [https://www.eeas.europa.eu/eeas/2022-report-eeas-activities-counter-fimi_en?etrans=it]

European Commission, Directorate-General for Communication Networks, Content and Technology. (2018). A multi-dimensional approach to disinformation : report of the independent High level Group on fake news and online disinformation. [https://data.europa.eu/doi/10.2759/739290]

European Commission. (2016). Joint communication to the European Parliament and the Council: Countering hybrid threats (COM(2016) 18 final). [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52016JC0018]

European Commission. (2018 December 5). Joint communication to the European Parliament, the European Council, the Council, the Economic and Social Committee and the Committee of the Regions: Action plan against disinformation [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018JC0036]

European Commission. (2018). Action plan against disinformation. European Commission contribution to the European Council [https://commission.europa.eu/publications/action-plan-disinformation-commission-contribution-european-council-13-14-december-2018_en]

European Commission. (2018). Code of practice on disinformation. [https://www.astrid-online.it/static/upload/1cod/1codeofpracticeondisinformation2.pdf]

European Commission. (2021). Guidance on strengthening the Code of Practice on Disinformation. [https://digital-strategy.ec.europa.eu/en/library/guidance-strengthening-code-practice-disinformation]

European Commission. (2022). 2022 Strengthened Code of Practice on Disinformation. [https://digital-strategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation]

European Commission. (2024, October 10). The Commission proposes measures to strengthen data-sharing and digital sovereignty in the EU. [https://ec.europa.eu/commission/presscorner/detail/en/ip_24_4123]

European Court of Auditors. (2021). Disinformation: The impact of disinformation on the EU's response to the COVID-19 pandemic (Special report No. 9/2021). [https://op.europa.eu/webpub/eca/special-reports/disinformation-9-2021/en/index.html]

European Union. (2012). Charter of fundamental rights of the European Union. Official Journal of the European Union. [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A12012P%2FTXT]

EUvsDisinfo. (2023, July 5). To challenge Russia's ongoing disinformation campaigns: Eight years of EUvsDisinfo. EUvsDisinfo. [https://euvsdisinfo.eu/to-challenge-russias-ongoing-disinformation-campaigns-eight-years-of-euvsdisinfo/]

Giusti, S. (2023). La disinformazione e la politica estera. Vita e Pensiero.
Hassan, C., & Pinelli, C. (2022). Disinformazione e democrazia: Populismo, rete e regolazione. Elementi.
Horowitz, J., & Seetharaman, D. (2020, May 26). Facebook executives shut down efforts to make the site less divisive. In Wall Street Journal.
Lakoff, G. (2014). All new don't think of an elephant!: Know your values and frame the debate. Chelsea Green Publishing.
Magnani, C. (2021). Finché ci sono fake news, c'è speranza: Libertà d'espressione, democrazia, nuovi media, Rubbettino.
Magnani, C. (2023). Nuovi media, libertà di espressione e costituzionalismo. In DirittiFondamentali.it, 2, 1-27. https://dirittifondamentali.it/wp-content/uploads/2023/08/Magnani-Nuovi-media-liberta-di-espressione-e-costituzionalismo.pdf
Meyer T., Marsden C. T., & Brown I. (2021). Regulating Internet content with technology: Analysis of policy initiatives relevant to illegal content and disinformation online in the European Union. In Disinformation and digital media as a challenge for democracy, 101-118. Cambridge University Press.
Meyer, T., Marsden, C. T., & Brown, I. (2021). Regulating Internet content with technology: Analysis of policy initiatives relevant to illegal content and disinformation online in the European Union. In Disinformation and digital media as a challenge for democracy, 101-118. Cambridge University Press. https://doi.org/10.1017/9781108878315.007
Nicita, A. (2021). Il mercato delle verità. Come la disinformazione minaccia la democrazia. Il Mulino.
Nyhan B., Reifer J. (2010), When corrections fail: the persistence of political misperceptions. In political Behavior, 32(2): 303-330 [https://doi.org/10.1007/s11109-010-9112-2]
Pitruzzella G., (2018). La libertà di informazione nell'era di Internet. In MEDIA LAWS(1), 19-47. [https://www.medialaws.eu/wp-content/uploads/2019/05/1.-Pitruzzella.pdf]
Quattrociocchi, W., & Vicini, A. (2023). Polarizzazioni: Informazioni, opinioni e altri demoni nell'infosfera. Franco Angeli.
Riva, G. (2018). Fake news: Vivere e sopravvivere in un mondo post-verità. Il Mulino.
Rubinelli, S., Diviani, N., & Fiordelli, M. (2020). Pensiero critico e disinformazione: Un problema contemporaneo. Carocci Editore.
Singer, P. W., & Brooking, E. (2018). LikeWar: The weaponization of social media. Houghton Mifflin Harcourt.
Stocchetti, M. (2021). (Dis)Information, neoliberalism and the strenght of democracy in the digital age. In Disinformation and digital media as a challenge for democracy, 47-80. Cambridge University Press.
Sunstein, C.R. #republic. La democrazia nell'epoca dei social media, Bologna, il Mulino, 2017
Zorloni, L. (2024, September 9). Digital Services Act: come si stanno muovendo le piattaforme dopo l'audit degli algoritmi. In Wired. [https://www.wired.it/article/digital-services-act-audit-algoritmi-raccomandazione-risultati-piattaforme-controllo/]

4 COUNTERING DISINFORMATION ON FACEBOOK, INSTAGRAM, YOUTUBE, TIK TOK AND TELEGRAM: INSIGHTS FROM UKRAINE- Alona Hryshko

4.1 IMPORTANCE OF THE ISSUE

Disinformation on social media has been a pressing concern in Ukraine since 2014, but following Russia's full-scale invasion on February 24, 2022, the volume of false information and manipulated visuals on these

platforms surged. This intensification of disinformation underscores the critical role of social networks and Ukrainian civil society in addressing these challenges.

In response, social media platforms have adopted multi-layered strategies to counter fake news by employing a combination of advanced technology, human moderation, partnerships, and user participation. Yet, some platforms remain slow to act, with Telegram posing a particular challenge. According to a 2023 survey by Internews on media consumption in Ukraine, 72% of Ukrainians use Telegram for news. However, this platform's anonymous channels make it a hub for disinformation networks that target Ukrainian audiences.

Instagram also presents unique risks. Data from Opora NGO reveals that around 29% of Ukrainians turn to Instagram for news amid the ongoing conflict. Instagram's emphasis on visuals and short-form videos has allowed it to become a conduit for anti-Ukrainian messaging and propaganda, often glorifying Russian aggression. With its strong visual appeal, Instagram is especially effective at spreading emotionally charged misinformation, which can simplify complex geopolitical issues into striking images that fuel propaganda.

To foster a better-informed online community, it is essential for social media platforms to establish clear, effective policies that transparently address disinformation.

4.2 KEY CHALLENGES

The battle against disinformation in Ukraine involves overcoming obstacles unique to each platform. For example, on Facebook, notable challenges include:

Bot Activity and Suspicious Accounts. Internews Ukraine's communication team reports weekly encounters with suspicious messages warning of potential page blocks for allegedly violating community standards. These messages often link to dubious sites. Additionally, bots frequently spread disinformation and emotional narratives through comments, creating further difficulties for Ukrainian media, particularly following promotional posts. Despite numerous user reports, Facebook's response to banning these accounts has been slow, while legitimate users can face restrictions simply for sharing the same link across multiple groups.

"Shadowbanning" Concerns. Ukrainian media pages covering war-related topics often experience sudden, unexplained drops in engagement, hinting at a phenomenon akin to shadowbanning. Although Meta denies shadowbanning, algorithms may still limit the visibility of content featuring certain keywords, especially those related to conflict. This practice restricts the reach of important information about human rights abuses and Russian aggression, thereby impeding public awareness.

Challenges with Engagement. Meta's algorithms prioritize highly engaging content to maximize user retention. However, sensitive content about the war, which often garners serious rather than upbeat reactions, is deprioritized. Newsworthy posts featuring violence or distressing images are subject to strict moderation, limiting their reach. For Ukrainian audiences, content may remain unblurred, whereas international audiences might benefit from blurred images that still convey the message but align with platform guidelines. This approach balances reach with adherence to community standards, allowing for greater visibility without risking algorithmic penalties.

Funded by the European Union

4.3 TIK TOK SPECIFIC CHALLENGES

Deletion of Video Content. Internews Ukraine has encountered frequent removal of videos that address disinformation and share the experiences of Ukrainians during the war. These removals are often attributed to "community guideline violations." However, TikTok's guidelines lack transparency, leading to inconsistencies in enforcement. Videos may also face restrictions due to banned music, even when no copyright issues exist.

Algorithmic Content Filtering and Echo Chambers. TikTok's algorithm shapes user content based on viewing habits, creating potential echo chambers where users are repeatedly exposed to similar content, which may include disinformation or extreme views. Minimal interactions can prompt the algorithm to prioritize videos on specific topics, such as war or anti-government sentiments, creating a "black hole" effect where users are trapped within narrow content streams.

Prevalence of Entertaining Content and Propaganda. Pro-Russian accounts often exploit TikTok's format to spread misleading narratives by creating fake profiles that mimic Ukrainian users. These accounts take advantage of TikTok's emphasis on engagement, knowing users are likely to interact with emotionally charged, visually compelling content. The platform's design limits exposure to debunking videos, as users may simply scroll past them in favor of sensational content. Furthermore, using hashtags related to war, disinformation, or political topics often triggers community guideline enforcement, leading to blocks, while reports on deepfakes or hate speech frequently receive minimal responses.

Geolocation Constraints on Audience Reach. Experiments show that the country of video publication and VPN usage impact its reach. For example, videos uploaded from Ukraine, even in English, are unlikely to reach U.S. or European audiences, limiting exposure of war-related content or disinformation debunking efforts to primarily Ukrainian viewers.

Increasing Use of AI in Content Creation. TikTok has implemented tools to label AI-generated videos, though this feature remains limited. Many deepfake videos evade detection by using external AI software, complicating content moderation efforts and increasing the platform's exposure to manipulated media.

Challenges with Content Moderation. Content related to war or politics often gains traction through provocative headlines and trigger words. TikTok does not verify the accuracy of the information, enabling users to form impressions within seconds, often influenced by bot-driven comments and repetitive slogans, such as "The government has abandoned us" or "Life was better before."

Bot Activity and Negative Interactions. Bots on TikTok, equipped with keyword and geographic filters, frequently target content related to Ukrainian regions like "Crimea" or "Mariupol" or military terms. This presents additional challenges for ad campaigns by government entities, which often attract bot activity or negative comments, requiring careful management.

4.4 METHODICAL IDENTIFICATION: META CASE

META is a prime example of how natural language processing (NLP) and machine learning are used to detect and eliminate false information. The software uses machine learning algorithms to look for trends in posts that could be signs of false content. Classifiers are used by these algorithms to highlight content

Funded by the European Union

for additional examination. Facebook can more accurately identify false articles and postings by using NLP techniques to comprehend the context and semantics of posts.

4.5 PARTNERSHIPS FOR FACT-CHEKING

Facebook launched its fact-checking initiative following the 2016 election. Users can flag content they find suspicious or misleading. META serves as an example of how working with outside fact-checkers may be beneficial, collaborating with independent fact-checkers certified by the International Fact-checking Network (IFCN) to address disinformation on Facebook and Instagram. The process involves identifying potential disinformation using technology and user feedback, then having fact-checkers review and rate the content's accuracy. Ratings include False, Altered, partly false, Missing context, Satire, and True. Content rated False or Altered receives the most stringent actions, such as lower visibility and strong warning labels, while partly false and Missing context receive milder labels. Content rated as Satire or True isn't labeled but linked to fact-check articles.

Meta ensures fewer people see disinformation by reducing the distribution of content rated as False, Altered, or Partly false. On Instagram, such content is filtered out of Explore and featured less prominently. Ads with rated content are rejected. Repeat offenders face restrictions, including reduced distribution, removal from recommendations, and limitations on monetization and advertising. For example, Instagram collaborates with institutions like PolitiFact and FactCheck.org to confirm the legitimacy of information. Instagram places a warning label and lowers the display of the material when it receives a bogus rating, pointing users to the fact-checking articles for further details.

4.6 USER REPORTING SYSTEM

X (ex. Twitter) is an example of a platform that leverages user reporting systems to combat disinformation. X allows users to report tweets they believe are misleading, and these reports are reviewed by human moderators. Additionally, Community Notes on X (ex. Twitter's "Birdwatch") feature enables users to add notes to tweets they find misleading, creating a community-driven fact-checking system.

According to X-Policy, users are prohibited from sharing synthetic, manipulated, or out-of-context media that may deceive or confuse people and cause harm. Such content may be labeled or removed to provide clarity on its authenticity.

Violation Criteria

Content is subject to labeling or removal if it:

- Is significantly and deceptively altered or fabricated.
- Is shared deceptively or with false context.
- Is likely to cause widespread confusion on public issues, impact safety, or cause harm.

Assessment Criteria

- Alteration and fabrication

Media must be significantly edited or created in a way that distorts its meaning or context.

- Deceptive sharing

Media shared with false claims or misleading context is evaluated for its potential to deceive.

- Potential harm

Funded by the European Union

Content likely to cause physical harm, incite violence, impede public services, or threaten privacy is subject to removal.

Non-Violation Instances
The following generally do not violate the policy:

- Memes or satire that do not cause significant confusion.
- Animations and cartoons with clear context.
- Commentary, reviews, and opinions.
- Counterspeech aiming to correct disinformation.

Consequences of Violations

- Post deletion

High-severity violations with serious harm risks lead to content removal.

- Labeling

Posts not removed may receive labels or warnings, reduced visibility, and limited engagement options.

- Account Locks

Accounts repeatedly violating the policy may face temporary visibility reduction, locks, or suspensions. Appeals can be made if accounts are locked or suspended in error.

4.7 "4RS" PRINCIPLES ON YOUTUBE

YouTube addresses disinformation through a comprehensive strategy based on the "4 Rs" principles: remove, reduce, raise, and reward.

Removing Violative Disinformation. YouTube removes content that violates its policies, particularly misleading or deceptive content that poses a serious risk of harm. Policies are developed with input from external experts and YouTube Creators and enforced using both human reviewers and machine learning.

Reducing the Spread of Borderline Content. Content that skirts policy violations but is still questionable is recommended less frequently, limiting its reach.

Raising High-Quality Information. YouTube elevates authoritative sources for news and information, ensuring that users are connected to reliable content.

Rewarding Trusted Creators. Trusted creators and artists are rewarded, incentivizing the production of high-quality, reliable content.

YouTube has initiated the Trusted Flagger program to enhance content reporting processes for non-governmental organizations (NGOs) with expertise in specific policy areas and for government agencies. Participants in the program receive training on YouTube's policies and have direct communication channels with YouTube's Trust & Safety specialists. While videos flagged by Trusted Flaggers are not automatically removed, they undergo the same human review process as those flagged by other users, with the potential for expedited review. Additionally, NGOs in the program receive periodic online training on YouTube's policies to stay updated.

Funded by the European Union

To conclude, social networks are implementing a multi-faceted approach to combat fake news, leveraging technology, human moderation, partnerships, and user involvement. Algorithmic detection, collaborations for fact-checking, user reporting systems, content moderation, educational initiatives, accountability and transparency measures, technology advancements, and cooperative efforts are some of these tactics. While these efforts are not foolproof, they represent significant steps towards reducing the spread of disinformation and ensuring a more informed online community.

5 MEDIA LANDSCAPE PER COUNTRY- Joen Martinsen

The media landscape across Europe is characterized by remarkable diversity, shaped by the region's rich cultural, linguistic, and political history. European countries exhibit a wide range of media environments, from those with high levels of press freedom and robust journalistic traditions to nations grappling with restrictions, political influence, and financial pressures. To help highligh some of the unique challenges and features in individual European countries, the Press Freedom index is a great indication on how the current media ecosystem is managing itself and might expose some trends and challenges in these countries. Globally, the Press Freedom Index has presented lower scores accross all European countries the last couple of years compared to just four to five years ago, with some countries such as Norway maintaining relativly high scores nonetheless, while other countries such as Poland and Greece, the index exposes much bigger systematic challenges. The publishers of this score, Reporters Without Borders (RSF) points to Coivd as a common indicatior for lower press freedom, with increased violence against journalist in context of anti-covid restriction protests. Another common trend is less news in paper format and the increased popularity of online news websites, leads to finanzing challenges for especially smaller media outlets in countries without the government support independent media with finaces, which challenges the media plurality in many countries.

Assessing the media landscape across different European countries and exposing their differences is crucial for understanding how fake news and disinformation spread across the continent. The media environment plays a pivotal role in shaping public perception and trust, and these environments vary significantly from one country to another in terms of press freedom, media ownership, regulatory frameworks, and the resilience of journalistic standards. This information is therefore crucial background information to understand how disinformation spreads and gives context to the impact of disinformation and can support more targeted strategies to counter disinformation across Europe.

5.1 NORWAY

Norway's media landscape is recognized as one of the freest and most trusted in the world, frequently ranking at the top of the RSF World Press Freedom Index, holding the number one spot consecutively from 2017 to 2024. The country's constitution protects the right to information, which supports several other laws safeguarding press freedom, and has been able to uphold high levels of press freedom while the trends have been negative for many other European countries (RSF, 2024). Moreover, Norwegians are among the world's most enthusiastic newspaper readers, boasting the second highest density of paid daily newspapers in circulation in Europe, just after Switzerland (Medialandscapes, n.d.). In recent years, there

has been a significant drop in print readership, accompanied by a surge in online newspaper subscriptions, following global trends (BBC News, 2023, March 28).

A key platform for news consumption in Norway is the Norwegian Broadcasting Corporation (NRK), dominating the radio and television market in the country, with the only real competitor being “TV2”. NRK is a government-owned radio and television broadcasting company and is the largest media organization in the country (BBC News, 2023 March 28). In 2023, NRK's daily newscast attracted an average of 516,000 views across both TV and their online channels. NRK also has the second-largest news website in Norway, Nrk.no, with an average of 1.4 million daily readers (Medietall, 2024). Despite their significant role, NRK viewership has been in decline, with 144,000 fewer average viewers than its peak in 2020, which had 655,000 average daily viewers, and 41,000 fewer views than in 2023 (Kampanje, February 2024).

Until 2022, 94% of NRK's funding came from a mandatory license fee paid by TV owners. Since then, it has been funded through the state budget via a dedicated NRK tax. Despite the recent decline in viewership, NRK remains the most trusted news source among Norwegians, maintaining its important role in the Norwegian media landscape (BBC).

Verdens Gang (VG) is Norway's most visited online news site, boasting nearly 2 million daily visits (1,994,916) on their website "Vg.no" in the first quarter of 2024 (Medietall). Established in 1945 by members of the resistance group "Hjemmefronten," VG is a tabloid newspaper that gained significant popularity in the early 2000s. It reached a peak of 395,000 daily copies in 2003, becoming the largest newspaper in the Nordic countries in terms of readership. Other notable news outlets include Aftenposten, which has the highest readership in physical print media with 217,451 daily newspapers consumed at the beginning of 2024. Another major competitor to VG is Dagbladet, with over 1.2 million (1,213,494) daily reads (Medietall, 2024).

In recent years, there have been some consolidations of local radio stations, due to the government call to change from FM-channels to DAB, which has been a costly transition. The reason being this technological transition being too expensive for some local radio station, with less resources has been identified though, so more resources were distributed to eleven local stations in 2023 to hinder further consolidations and further weaken the radio pluralism in the country, which is important for the coverage of local news and media.

5.2 GERMANY

Germany ranks 10th in 2024 in World Press Freedom Index made by RSF, which is a jump on the list from being 21st the previous year. Although the placement has improved and is doing okay compared to a lot of other countries, Germany has still received a somewhat lower score from RSF in recent years due to a couple reasons. One being political violence targeting journalists, especially from the far right. Another explanation is German local news media has been more and more neglected over the past years, weakening the overall media pluralism in the country, which could be a democratic problem (RSF, 2024).

Germany’s large and decentralized media landscape features several prominent news outlets, but most with relatively small consumption rates. One of its major newspapers, “Süddeutsche Zeitung”, has a daily readership of 400,000 across both print and online formats, which is relatively small for a nation of over 80 million people (Statista, 2024 April 15). This decentralization extends to the broadcasting sector

as well. Instead of a single national broadcaster with regional branches, each German state, or "Bundesland," has its own independent broadcaster. Nine of these regional broadcasters form a consortium known as ARD (Arbeitsgemeinschaft der öffentlich-rechtlichen Rundfunkanstalten der Bundesrepublik Deutschland), which produces the main national channel, "Das Erste." ARD also includes Deutsche Welle, which provides international news in 30 languages. Germany does have one national broadcaster, Zweites Deutsches Fernsehen (ZDF), which offers a more unified national perspective. Together, ARD and ZDF manage the national radio channel Deutschlandradio, with its primary news station Deutschlandfunk (BBC, 2023 August 28).

The only newspaper arguably reaching a broader audience in Germany is BILD. BILD-Zeitung Deutschland has the largest number of national daily newspapers, with a little over 1 million (1040600) paid newspapers in circulation (Statista, 2024 April 15). With also a large number of online readers is BILD the largest tabloid newspaper in Germany and Bild.de is not only the most visited news website, but the most visited of any website in Germany. A German expert, Ingrid Brekke, explains BILD-Zeitung as more tabloid and sensationalized than any newspaper in that exists in Norway, and could be more compared to the British “The Sun” (Ingrid Brekke, 2022, p. 161). Due to its size combined with tabloid form, BILD is Germany's most contested news platform in the Country. Nonetheless, BILD-Zeitung manages to reach a wider German audience because it simplifies cases and make them easier to consume for a larger mass audience.

BILD’s style does not represent the broader German media tradition, which tends to favor slower, more in-depth journalistic analysis. This preference is evident in the popularity of political talk shows in Germany. Additional to newspapers, is a lot of the political debate in Germany taken place on political talk-shows which makes up a unique genre of journalism in this country (Brekke, 2022, p. 170-174). The biggest being a show called “Anne Will” shown on the channel “Das Erste” with an avarage of 3,97 million viewers in 2020 (Das Erste, n.d.). The show is named after the talk-show host herself, which is also common in the realm of German talk-shows. However, Anne will show concluded its final season after 16 years (Queer, 2023 November). Other famous examples of debate show in this genre are “Markus Lanz”, “Hart aber Fair”, “Maybrit Illner” and “Maisch Berger”. These shows have a serious tone, and the show is laid out more as an informative debate show than what one usually associates with the term “talk-show”. This phenomenon arguably reflects a lot of the debate culture and media culture in Germany, shaping a very different societal debate than in other European countries (Brekke, 2022, p. 172).

5.3 UNITED KINGDOM

The United Kingdom ranks 23rd globally on the Press Freedom Index, and the RSF emphasizes a restrictive political climate in the UK that has impacted press freedom in the country in recent years, despite the governments reassurance that press freedom is a priority. There is a low public trust in the media in the UK (RSF, 2024). Additionally, the UK had some of the highest numbers new avoidance in their population, with 46% of brits said they avoided to reading the news, reflecting a larger news fatigue in the UK compared to other western European countries (Reuters Institute for the Study of Journalism, 2022). Reporters without Borders also focuses on a case of an Iranian reporter in exile being stabbed at a train in London. This attack was one of many cases of Iranian authorities targeting reporters who reports on Iran

Funded by the European Union

from Abroad, living in exile. The RSF calls for a reaction from British authorities to do more to protect journalists under serious threats, and to incorporate measures against the transnational repression of journalists into the National Action Plan for the Safety of Journalist (RSF, 2023 May 17).

The UK's newspaper landscape is stratified by class and a left/right political divide. Readerships of quality/broadsheet newspapers are predominantly ABC1, with far fewer readers, and in 2018 did tabloid newspapers account for 48% of the market, while broadsheets only accounted for 19% (Media landscapes, n.d.). Metro tops the list as the UK's highest circulation newspaper, demonstrating that some of the best things in life are free. This weekday paper, available at no cost, is distributed on metros and in other public spaces. In April 2024, Metro had an average daily circulation of 953,665 copies. The Daily Mail follows with a daily circulation of 699,240 during the same period, while the Evening Standard, another free newspaper, has a circulation of 274,538 (Press Gazette, 2024 May 16).

Notably, some major titles are absent from this list. The Sun, Times, and Telegraph have opted to keep their ABC circulation figures private since early 2020. The Guardian and Observer followed suit in September 2021. The Sun, a tabloid published in the UK and Ireland, held the top circulation spot until March 2018, when it was overtaken by Metro. In March 2020, The Sun had a circulation of 1,210,915, followed by The Times with 365,880, and the Daily Telegraph with 317,817. In July 2021, The Observer had a daily circulation of 136,656, and The Guardian had 105,134. These numbers indicate that these publications still hold a significant market share. However, the media market has declined substantially in recent years. If The Sun's circulation has decreased in line with industry trends, it is estimated that their daily circulation would be around 700,000 in 2024 (Press Gazette, 2024 May 16).

Public service broadcasting in the UK is characterized by a strong tradition of political neutrality, mandated by statutory regulations that require all news produced by broadcasters, both television and radio, to be impartial and provide balanced coverage. Broadcast TV remains highly popular, with 91 percent of the population watching TV at least once a week. The BBC is Europe's most successful public broadcaster, reaching 67 percent of the population weekly through its TV and radio news services (Media landscapes, n.d.).

Although the methods of accessing content are evolving, the decline in time spent watching broadcast TV has been gradual, decreasing from 242 minutes per day in 2010 to 212 minutes per day in 2016. Beyond the BBC, the UK has a diverse and fragmented television market. ITV, legally known as Channel 3, is a major British free-to-air public broadcast television network. Revenue measurements from 2014 indicate that Sky is the largest broadcaster by far, with revenues amounting to £7.6 billion (Media landscapes, n.d.).

5.4 BELGIUM

Belgium is ranked 16th globally on the press freedom index and enjoys relatively high level of trust in their media. The country also has good political and legal mechanisms to protect journalists (RSF, 2024). A law concerning journalists' rights to protect their sources is described as among the most protective globally, being a constitutional guarantee (BBC News, 2023 August 21). However, Belgium received a lower score in 2023 due to the prior censorship authorized by a court that year, which was seen as a troubling development for their press freedom. There has also been reported some violence against journalist during coverage of protests. Since covid, the increased awareness of disinformation has increased public

Funded by the European Union

distrust in media, particularly in the pro-government's media narratives. In response to this growing trend, the Wallonia-Brussels Federation adopted a media education plan in 2022. This plan aims to foster a critical understanding of media among students (RSF, 2024).

A defining feature of Belgium media landscape is that unlike most other European countries, Belgium does not have a single public broadcasting organization. Like the country itself, the media structure is clearly divided by its Flemish, French and German language communities (BBC). The VRT, Flanders' national public-service broadcaster, enjoys significant popularity in Dutch-speaking Belgium. Additionally, VRTs public radio station Radio 2 was undoubtedly the most popular in the Dutch-speaking market in the country. In contrast, the southern Walloon region has a more fragmented audience market. Here, RTBF and the Luxembourg-based RTL Group share the leading position, each holding approximately 20 percent of the market share (Statista, Jan 10, 2024). Both RTBF and VRT is being administrated by the Belgium government, lead by boards of directors with representatives from the main political parties.

Rossel Group successfully acquired RTL Belgium in a joint venture with DPG Media, significantly strengthening their presence in Belgium, resulting in a dominant Belgian advertising entity. Together, RTL Belgium, Rossel Group, and DPG Media now control 41% of the broadcast and print advertising market, with substantial shares in radio (52%) and television (59%). Despite this dominance, the trend of online subscriptions and declining advertising profits due to increased digital consumption is notable (Reuters Institute for the Study of Journalism, 2022).

Mediahuis and DPG Media dominate the newspaper market in Flanders (Ayling, 29. nov. 2023). Mediahuis publishes several widely read newspapers, including Het Nieuwsblad, which had 1.13 million daily readers in 2019, and the investigative newspaper De Standaard, with 490,000 readers in the same year (Statista, 2024). Meanwhile, DPG Media is the publisher of the leading Flemish newspaper, Het Laatste Nieuws, as well as the high-quality newspaper De Morgen. While In Wallonia, the most popular newspaper is Le Soir, which is a political newspaper that has been able to attract a lot of young people as well (Ayling, 2023 November 29).

5.5 ITALY

Italy ranks 46th globally on the press freedom index in 2024, as the Italian press freedom continues to be threatened by Mafia organizations, as well as other small violent organizations. There is thereby a level of self-censorship in Italian journalism to avoid problems with these violent organizations (RSF, 2024). Additionally, a recent law commonly known as the 'gag law' or 'legge bavaglio', has undergone approval in Italy. This law aims to prohibit journalists from publishing pre-trial orders, whether in full or as excerpts, until the conclusion of a preliminary hearing. Despite acknowledging the presumption of innocence for defendants until the conclusion of all trial phases, the gag law is deemed an unreasonable form of censorship and is a violation of the European Commission's recommendations on press freedom in the European Union (EC 2021/1534), according to the European Parliament (European Parliament, 2024 March 19). The economic situation in Italy doesn't help the press freedom either and has made the Italian media increasingly dependent on advertising revenue and state subsidies. The print media is also facing a gradual decline in sales. The result is a growing precariousness that dangerously undermines journalism, its dynamism and its autonomy. On top of this, like other countries has also Italy experienced a persisting

political polarization since Covid-19, which has led to an increase of violence from protesters towards journalists (RSF, 2024).

The Italian press is highly regionalized, reflecting the countrys deeply rooted regional history and character (BBC News, 2023 June 3). Milan, in particular, is home to numerous newspapers and magazines, such as Corriere della Sera, which boasted Italy's largest circulation in 2023 with an average of 217,000 copies and 500,000 online subscriptions (Statista, 2024 March). Most newspapers are privately owned, often affiliated with political parties or operated by large media conglomerates. Consequently, similar to the situation in Germany, newspaper readership in Italy is relatively low compared to other European countries, because they have many private local newspapers rather than large state owned with a national audience (BBC News, 2023 June 3). Another major newspaper, La Repubblica, based in Rome, had an average circulation of 107,435 copies and attracted 3.15 million unique users in January 2024, making it one of the most visited papers in the country (Statista, 2024, April).

After television is Radio the second most popular medium in Italy, with a study revealing that 33 million individuals listed to the radio in 2021 (Statista, 2023 December). In Italy, radio is the most trusted medium, with the public broadcaster RAI being the most prominent when it comes to trusted media in the country. RAI operates three networks and takes up a large share of the market, accounting for 21.9% of total sector revenues. Unlike private broadcasters, RAI is funded through license fees, giving it a competitive advantage. Despite this, RAI ranks sixth in market revenues, trailing behind private networks such as RTL 102.5, which leads with 19.5% of listeners on an average day. Following RTL 102.5 are RDS with a 13.5% share, Radio Deejay with a 13.2% share, Radio Italia with a 13% share, and Radio 105 Network with a 12.9% share (Media Landscapes, n.d.). Most prominent Radio stations for news consumption in Italy is Radio 24, Radio Byoblu libera e indipendente. One also has Rai Gr Parlamento based in Rome, who is a very politics centered radio station, reporting on the procedures in the Italian Parliament, presidency, as well as the European Parliament and some local governments and councils.

5.6 FRANCE

France ranks 21st globally in the press freedom index. This relatively lower position compared to its European neighbors is attributed to inadequate mechanisms for preventing media conflicts of interest and insufficient protection for journalists' sources. The public broadcasting sector is struggling due to the elimination of the TV license fee, resulting in unsustainable funding. Although a new method to manage demonstrations has been adopted to better respect journalists' rights, reporters still face police violence and attacks from demonstrators (RSF, 2024; BBC News, 2023 June 19).

The French state holds a considerable stake in the country's media landscape, encompassing 100 percent ownership of prominent entities such as the France TV group, LCP, Public Sénat, France 24, TV5 Monde, and a 50 percent share in ARTE. Additionally, it oversees the operations of the Radio France group, RFI, Monte Carlo Doualiya, and the website Ina.fr. Complementing this state-owned sector are numerous privately owned media outlets that contribute to France's diverse media environment (Media Landscapes, n.d.).

Among these private entities, Vivendi, under the leadership of Vincent Bolloré, is a significant player. Vivendi operates the Canal+ TV group, which includes three free channels and six paid channels, and also holds ownership of the free print daily press CNews. Furthermore, the RTL group, a subsidiary of

Funded by the European Union

Bertelsmann, maintains control over eight TV channels, three radio stations, and the Prisma Presse group, responsible for publishing 28 print magazines and managing five digital platforms. In addition to these key players, other notable shareholders such as Lagardère Active, The TF1 group, Le Monde group, and LVMH Media also wield considerable influence within the French media landscape (Media Landscapes, n.d. ; RSF, 2024).

In 2022, Le Monde claimed the top spot among national daily newspapers, releasing 472,000 copies daily, while Le Figaro followed closely behind in second place with 350,000 copies (Statista, 2023 March 15), which is the oldest newspapers that is still being published in France today and is positioned as a center-right paper reflecting conservative values. Le monde is a respected national daily newspaper, considered to be France's newspaper of record, also having an international audience. While for commercial radios in France particularly RTL and Europe 1, command large audiences in the country (BBC News 2023 June 19).

France is home to many independent news outlets that are popular among their target audiences. One notable example is "Mediapart," a left-leaning independent news outlet that has established itself as a successful investigative journalism platform. Founded in 2008 by a former editor of Le Monde, Mediapart is known for its high-quality, in-depth investigative articles. The outlet attracts over 6 million monthly visitors to its website and maintains around 220,000 paid subscriptions. These subscription fees are Mediapart's sole source of income, ensuring its independence from advertising, commercial interests, and political influence (Rubio, 2022, March 16).

The business model of independent media has faced significant challenges with the shift from print to digital formats. In response to the economic pressures exacerbated by the Covid-19 pandemic, French MPs approved a measure to support the struggling sector. They introduced a tax credit for new subscribers to current affairs newspapers or magazines, acknowledging that the industry was "suffering enormously" from the crisis. This initiative allows households a one-time tax deduction of up to €50 if they commit to a subscription of at least 12 months for a newspaper, magazine, or online news service that offers general or political news content (Henley, July 1, 2020).

5.7 GREECE

The Greek media landscape is defined by issues and challenges unlike any of its European counterparts. Ranking 88th globally on the press freedom index, Greece is just behind Burkina Faso on the list in 2024, which is actually an improvement from its 107th placement in 2023. Since 2021, the country's press freedom has faced a systemic crisis (RSF, 2024). The unresolved scandal involving the National Intelligence Service (EYP) wiretapping journalists, and the still-unsolved murder of veteran crime reporter Giorgos Karaivaz, underscore this issue (BBC News, 2023, June 28). Strategic lawsuits against public participation (SLAPP) are prevalent, and in 2023, a journalist was unjustly convicted of spreading fake news. Consequently, public trust in the media has been among the lowest in Europe for many years. The media landscape is highly fragmented, dominated by a few large privately owned groups like Alter Ego Media, alongside hundreds of smaller news sites (RSF, 2024).

The Greek media landscape is marked by an oversupply of newspapers, TV channels, magazines, and radio stations, leading to intense competition for a limited audience and advertising market. Despite this

mismatch with the advertising industry's needs, the sector has shown adaptability to economic fluctuations. However, the financial crisis since 2009 has significantly reduced advertising revenues and worsened the situation for the press due to the state's inability to pay or reimburse contractors for public works. This has particularly affected media entrepreneurs involved in public construction projects, who could no longer cross-subsidize their media outlets with public order revenues (European Journalism Centre, n.d.)

Ta Nea (translates into “The News”) was established in 1931 and is the highest-circulating newspaper in Greece, as it has been so for decades. To Vima is another large paper and both if these are based in Athens. On online news websites is allegedly Kathimerini currently dominating the media landscape. However, finding reliable statistics on readership on Greek news media is difficult, leaving only numbers on papers in circulation, which doesn’t reflect the full picture of the media activity in the country.

5.8 BULGARIA

Bulgaria is struggling with corruption and poverty building a fragile foundation for press freedom, finding itself on 55th place globally according to the press freedom index. The country does provide minimum legislative and legal standards for the protection of journalists, in line with the requirements of the European Convention on Human Rights and the case-law of the Strasbourg Court. However, corruption and low effectiveness in the legal system often makes the state incapable of acting on these freedom violations. Moreover, there is a lack of transparency regarding national and EU funds to the media, being a potential partisan distribution of the money to certain media platforms (RSF, 2024). The evident lack of transparency and corruption plaguing the media landscape is reflected in the Corruption Perceptions Index ranking Bulgaria 67th in the world in 2023 (Transparency International, n.d.). Media financing is also a pressing problem in Bulgaria. Over the past two decades, severe competition and market constraints—compounded by the 2008-2013 global financial crisis—have drastically reduced advertising revenue, pushing many print media outlets to the brink of collapse. This intense struggle for funding has led numerous media organizations to prioritize sponsor interests over their traditional role as watchdogs of political power (Trifonova, 2022, p. 3).

BNT, bTV, and Nova stand as the foremost television networks for news coverage in the country, although recent reports suggest a waning influence (BBC News, April 3, 2023). BNT serves as the country’s public broadcaster, boasting four channels: BNT1, BNT2, BNT3, and BNT4. Meanwhile, bTV holds the distinction of being Bulgaria's first privately owned national television channel. It is under the operation of bTV Media Group, a subsidiary of the Central European Media Enterprises. Nova television, launched in 1994, marked the inception of Bulgaria's commercial television landscape. Awarded a national television license in 2003, Nova became the country's third national television network, following BNT and bTV. It is owned by the leading media provider in Southeast Europe, the United Group (Konrad-Adenauer-Stiftung, n.d.).

Dnevnik, Novinite, and StandartNews emerge as the premier online news platforms within the country, according to Feedspot's report on May 17, 2024. Dnevnik is generally recognized as a conservative-leaning platform, while StandartNews tends to position itself as a liberal independent

platform. Additionally, the Bulgarian Telegraph Agency stands out as a significant official news service. Meanwhile, Sega is notable for its left-leaning editorial stance, as per information from Worldpress.

5.9 LATVIA

Latvia enjoys a media independence where journalistic work happens in a safe and free environment. The country ranks 12th globally on the press freedom index in 2024. The legal framework guarantees freedom of the press, confidentiality of journalistic sources and access to public information. Moreover, Journalists are not subject to censorship or government control. However, Latvia still faces some challenges. The Country has both a Latvian-speaking and Russian-speaking press, and since the start of the war in Ukraine in 2022, has the Russian-language press faced increased social and political pressure and concerns for media pluralism for the Russian speaking population. The government has decided to evocation of broadcasting licenses for Russian-press, leaving fewer options for the Russian-speaking population. The concern that it's getting harder to access reliable information in Russian is also echoed by international watchdogs. Additionally, Since the War in Ukraine there's also been observed an increase in fake news, which has lowered public trust in the media in the last few years (RSF, 2024; BBC News, 2023 August 22).

Television broadcasting holds significant importance in Latvia. It was the first among the three Baltic countries to establish its broadcasting service back in 1954. Following the collapse of the Soviet Union, Latvia swiftly introduced private broadcasters (Media Landscapes, n.d.). Presently, the Public Broadcasting of Latvia (LSM) serves as a publicly funded radio and television organization, operated collaboratively by Latvia's two public broadcasters: Latvian Television and Radio Latvia. LSM functions as a unified news portal accessible in Latvian, Russian, and English, catering to a wide audience across the country (Public Broadcasting of Latvia, n.d.).

5.10 POLAND

Poland ranks 47th globally on the Press Freedom Index in 2024, showing some improvement this year, following the end of the eight-year rule by the Law and Justice Party (PiS) after the opposition's victory in 2023. The PiS government had utilized national media, particularly the TVP group, as a propaganda tool (RSF, 2024). This is significant as TVP is one of the three dominant platforms in the Polish media landscape, along with TVN and Polsat (BBC News, March 28, 2023). Meanwhile, privately owned media faced considerable pressure and verbal threats from the PiS government. The government also took control of the PolskaPress network of local newspapers by orchestrating its purchase through the mostly state-owned oil company, Orlen, with their own media company called Orlen press (RSF, 2024; Reuters Institute, 2023). These issues encountered little resistance, as public awareness of press freedom appears to be very low in Poland (RSF, 2024).

Since the new government took power in early 2024, incidents of violence and SLAPP suits against privately owned media have decreased. The new government has attempted to implement reforms to the public media and reverse the damage done by PiS. However, these reforms are seen as fragile and have met substantial resistance from the PiS opposition party, which is trying to block the changes. Some NGOs

Funded by the European Union

have also criticized the new government's efforts to purge the media of PiS loyalists, claiming that the process has not been executed in a legal and orderly manner (Brzeziński, 2023 December 27).

Despite these political challenges, Poland still enjoys relatively good media diversity and pluralism, with several private and independent news organizations maintaining a strong presence (RSF, 2024; BBC News, March 28, 2023). Among these, RMF Radio stands out as the most quoted media outlet across all forms of media in the country, with 1,765 citations in 2023 according to the IMM report. It is followed by Wirtualna Polska (1,665 citations), Rzeczpospolita (1,483 citations), TVN24, and Radio Zet (IMM, 2023 February 28).

Wirtualna Polska is also the second largest online news website in Poland, with 32% of the population visiting its site weekly, just behind Onet.pl, which has a 39% weekly visit rate (Reuters Institute, 2023). Rzeczpospolita, a center-right newspaper with conservative-liberal values, is one of the most quoted newspapers in Poland. Owned by Gremi Media, it ranks sixth in daily consumption with a 17% audience reach (Statista, May 17, 2024). Despite its ranking, Rzeczpospolita is significant because it reaches a nationwide audience, with 75% of its readers being highly educated as of 2016, contributing to its respected status (PRS, 2017).

TVN24, a 24-hour commercial news channel, is part of the TVN network, the largest commercial media platform in Poland. Known for its critical stance towards the previous PiS government, TVN24 has been owned by American Warner Bros Discovery since 2018. The diversity of these frequently quoted media outlets highlights the robust presence of commercial media in Poland that remains independent of government control (DBpedia, 2024).

Regarding the country's print media, newspapers are in decline in Poland, mirroring trends seen in other European countries, with online news outlets increasingly dominating the market (RSF, 2024). However, there are still some papers worth mentioning with a respectable number of papers in circulation. In 2023, Fakt Gazeta Codzienna was the leading daily newspaper in Poland, with sales exceeding 122,000 copies. It was followed by Super Express, which sold 69,500 copies, and Gazeta Wyborcza, with 39,750 copies sold (Statista, May 28, 2024). However, another survey revealed different trends in daily newspaper consumption. According to this survey, Gazeta Wyborcza had the highest daily readership at 36%, followed closely by Super Express at 36%. Fakt Gazeta Codzienna ranked fourth with 24% of respondents, behind Dziennik Gazeta Prawna, which had a 25% readership (Statista, May 17, 2024).

5.11 SPAIN

Spanish media exerts considerable cultural influence worldwide, thanks to the 427 million Spanish speakers across 20 countries. This broad audience lends the Spanish media landscape substantial cultural significance and generates notable economic revenue for Spain (Media Landscapes, n.d.). Spain ranks 30th globally on the Press Freedom Index, a position reflecting a media environment often influenced by political polarization. This polarization sometimes blurs the lines between factual reporting and opinion journalism, leading to a degree of public distrust in the media. Press freedom has faced further challenges with journalists being attacked during recent anti-government protests (RSF, 2024). Compared to other European nations, Spain's media institutions and legislation are relatively underdeveloped, with media accountability primarily managed by the state (Media Landscapes, n.d.).

Funded by the European Union

The broadcasting sector in Spain is heavily dominated by publicly owned entities, with RTVE alone controlling over 75% of the market. Regionally, public broadcasters that are part of the Federation of Regional Radio and Television Entities (FORTA) also wield significant influence, increasing the risk of political interference (RSF, 2024). American-based press freedom organizations have raised concerns about concentrated media ownership in Spain, noting that dominance by a few actors like RTVE undermines media pluralism.

The largest newspapers in Spain are predominantly sports papers, especially those focusing on football (BBC News, August 28, 2023). In the third quarter of 2023, Marca was the most widely read newspaper in Spain, with 978,000 print readers, and its website, marca.com, received over 350 million visits worldwide. Marca, a national sports newspaper in tabloid format, is designed for broad accessibility. It is followed by El País (802,000 readers), El Mundo (467,000 readers), and As (402,000 readers) (Statista, May 22, 2024). El País, based in Madrid, is the largest non-sports-related newspaper in the country. Besides its 800,000 print readers, it has 250,000 online subscribers, and its website attracts 300 million monthly views from 78 million unique browsers. El País is widely regarded as "the gold standard" in Spanish journalism (PRISA, n.d.). The significant viewership of these websites is also due to their reach among audiences in South American countries and Spanish-speaking populations in the USA. El Mundo, catering to a conservative readership, has been criticized for its polemical commentary rather than for its critical journalism.

5.12 SWITZERLAND

Switzerland offers a protective and safe environment for journalism, and the country ranks 9th globally on the press freedom index in 2024. The country still has struggled with a changing political climate, with some controversial legislation restricting investigative journalism (RSF, 2024). The UN called out Switzerland for “criminalizing journalism”, regarding the country’s banking secrecy to protect privacy concerns, has said to limit journalist opportunity to investigate corrupt officials, financial criminals and human rights abuse. The law the UN reporter is concerned about is criminalizing Journalists who publishing leaked data of bank clients could face up to five years in prison under Swiss bank law (Swissinfo, 2022 May 3). Opposite of many other countries, Swiss people prefer consuming media on print or online news websites, instead of Media on television or radio. The media landscape also reflects the linguistic diversity in the country, where 251 print publications in the country there made up of 213 publications in German, 29 in French, 9 in Italian and 2 in Romansh, from numbers of 2022 (FDFA, 2023 December 28).

Most of Switzerland's broadcasting funding comes from TV licence fee revenues, with a smaller portion from advertising. This system was upheld after a 2018 referendum, where over 70% of voters rejected a proposal to abolish the licence fee (BBC News, 2023 June 19). Alongside state radio and television, Switzerland has 38 local and regional radio and TV broadcasters which are subsidized by the federal government. In the German speaking part of the country is SRF1, while RTS1 is the largest in the French speaking part and RSI La 1 is the most popular in the Italian part of Switzerland. Additionally, are channels from broadcasters from Germany, France and Italy widely available through satellite.

In Switzerland, the two largest newspapers by circulation are both free. The leading newspaper in 2023 was "20 Minuten," based in the German-speaking region, with an average circulation of

Funded by the European Union

approximately 330,704 copies. The second-largest is the French edition of "20 Minuten," with 137,190 copies. Both editions are published by Tamedia, the country's largest media owner. Over the past decade, Tamedia has acquired numerous regional newspapers, including "24heures" and the tabloid "Le Matin.".

Tamedia AG commands nearly 40 percent of the press market share in the German-speaking region and over 60 percent in the French-speaking part. Among its publications are "Tages-Anzeiger" (140,196 copies), the Sunday paper "SonntagsZeitung" (160,298 copies), "Berner Zeitung" (96,804 copies), and "Der Bund" (39,948 copies). Another major media player is the NZZ Media Group, known for its prestigious daily newspaper "Neue Zürcher Zeitung" (90,011 copies). The group also publishes regional newspapers in eastern and central Switzerland, such as "Neue Luzerner Zeitung" (114,109 copies) and "St. Galler Tagblatt" (117,529 copies).

5.13 UKRAINE

Ukraine is in the midst of an information war since Russia invaded the country in February 2022, placing the nation’s media under existential threat. Many countries have been contending with Russian propaganda about the war, but Ukraine has been at the forefront of countering disinformation from the Kremlin. The media landscape in Ukraine is partly diverse; however, many outlets are owned by oligarchs, and the war has financially strained numerous journalists (RSF, 2024). In Russian-occupied territories, Ukrainian media is completely silenced by Russian propaganda. According to IMI, at least 230 media publications or outlets in Ukraine have closed or ceased operations since the war began (WAN-IFRA, 2024, February). This has been the reality in Crimea since its annexation in 2014. The disinformation war, however, started long before the invasion with Russian attempts to divide the country (RSF, 2024).

After the Maidan Revolution in 2014, several legal measures were implemented to enhance media transparency and protect journalists in the country. Additionally, NGOs have consistently worked to improve media literacy in the country. According to CMPF, media literacy has significantly improved since 2022, with only 6% of respondents demonstrating low media literacy (CMPF, 2024, January 10). Notable non-governmental organizations involved in these efforts include StopFake, VoxCheck, TEXTY.ORG.UA, and Media Detector, as well as two institutions established by the Ukrainian government to counter Russian disinformation (CMPF, 2024, January 10).

Television was previously the most important media platform for consumers in Ukraine, with over 98% of the population watching it. Ukrainian broadcasting has been highly dominated by oligarch-owned media, and these channels have the largest audience, with no counterbalance to their significant influence in the media landscape. Suspilne, the country’s public broadcaster, could serve as a counterweight but has been underfinanced since its launch in early 2017 and has an audience of less than 1% of the population. There are several independent outlets, such as Hromadske TV and Radio, which are influential in their segments. There are also stronger local outlets, but they only target a small portion of the population (Media Landscapes, n.d.).

Before the war started in February 2022, a process of "de-oligarchization" had begun with President Volodymyr Zelensky's program aimed at reducing large entrepreneurs' influence on political processes and the media landscape in Ukraine (Forbes, 2022, July 20). A law passed in September 2021 required oligarchs to be categorized in a special register (Ukrinform, 2021, September 23). By spring 2022, 86 oligarchs had

been identified in the country, according to the Secretary of the National Security Council (Forbes, 2022, July 20). However, this campaign has been criticized as a populist move that could be used to target political opponents. The Venice Commission reviewed the law and concluded that it was not a "democratic approach" to the oligarch problem. Nevertheless, the Ukrainian government has agreed with the European Commission to delay the law's implementation until the Russian invasion ends, and a new law has already been passed that incorporates the Venice Commission's recommendations (Radio Free Europe/Radio Liberty, 2023, September 23).

The invasion has dramatically changed media consumption preferences, making social media a more important outlet for news than television (BBC News, 2023, June 21). Footage of the war shared on social media has been used as a tool to maintain morale in the country and as a strategic tool in the war. The government has created its own Telegram channels to provide fast and direct communication with the population about the current situation in the war. Studies show that after the invasion began, 63.3% of Ukrainians started using Telegram channels for news, up from just 35.9% before the full-scale invasion (CMPF, 2024, January 10).

A notable independent news outlet in Ukraine is "The New Voice of Ukraine," founded in 2014. It claims to present unbiased news and is not affiliated with any political party. The news is delivered in Ukrainian, Russian, and English. Since the Russian invasion, NV has consistently reported on the war from bomb shelters, and due to their efforts, they have been targeted by Russian cyber-attacks. According to 2021 data from Gemius international research, the outlet has the fifth-highest readership in the country, with 5,572,440 "real users" visiting their website. The news outlet is considered one of the only two in Ukraine that provide reliable news from the frontlines, according to the Ukrainian Institute in London (Moore, 2022, March 17).

The media landscapes across Europe are complex and varied, with each country facing unique challenges that reveal critical vulnerabilities to disinformation. This assessment highlights how economic pressures, political influence, and digital shifts impact press freedom, most notably in parts of Southern and Eastern Europe. Independent journalism often suffers due to reduced funding and political pressures, creating gaps in media plurality that limit counter-narratives to disinformation. These weaknesses enable disinformation to spread by exploiting digital platforms, public distrust, and the restricted capacity of media to address polarizing narratives effectively.

5.14 CONCLUSIONS

The media landscapes across Europe are complex and varied, with each country facing unique challenges that reveal critical vulnerabilities to disinformation. This assessment highlights how economic pressures, political influence, and digital shifts impact press freedom, most notably in parts of Southern and Eastern Europe. Independent journalism often suffers due to reduced funding and political pressures, creating gaps in media plurality that limit counter-narratives to disinformation. These weaknesses enable disinformation to spread by exploiting digital platforms, public distrust, and the restricted capacity of media to address polarizing narratives effectively.

Funded by the European Union

5.15 REFERENCES

Athens24. (n.d.). Ta Nea newspaper. Athens24. https://www.athens24.com/directory/ta-nea-newspaper.html
BBC News (2023 April 3). Bulgaria Media Guide. https://www.bbc.com/news/world-europe-17205118
BBC News (2023 August 21). Belgium Media Guide. https://www.bbc.com/news/world-europe-17208922
BBC News (2023 August 22). Latvia Media Guide. https://www.bbc.com/news/world-europe-17528622
BBC News (2023 August 28). German Media Guide. https://www.bbc.com/news/world-europe-17301193
BBC News (2023 August 28). Spain Media Guide. https://www.bbc.com/news/world-europe-17753721
BBC News (2023 June 19). France Media Guide. https://www.bbc.com/news/world-europe-17299010
BBC News (2023 June 19). Switzerland Media Guide. https://www.bbc.com/news/world-europe-17753721
BBC News (2023 June 21). Ukraine Media Guide. https://www.bbc.com/news/world-europe-18006248
BBC News (2023 June 28). Greece Media Guide. https://www.bbc.com/news/world-europe-17372888
BBC News (2023 June 3). Italy Media Guide. https://www.bbc.com/news/world-europe-17433146
BBC News (2023 March 28). Norway Media Guide. https://www.bbc.com/news/world-europe-17745325
BBC News (2023 March 28). Poland Media Guide. https://www.bbc.com/news/world-europe-17753721
Brzeziński, B. (2023, December 27). Poland's media revolution turns into a political battle. POLITICO. https://www.politico.eu/article/poland-media-revolution-pis-law-and-justice-tusk-duda/
Brekke. I. (2022). De kunste Hjerters Land: Et innblikk i Tysk Politikk. Humanist Forlag.
Centre for Media Pluralism and Freedom. (2024, January 10). Ukraine's media landscape in 2022. https://cmpf.eui.eu/ukranian-media-landscape-in-2022/
Charles Ayling (2023 November 29). Media in Belgium: Media Landscape Guide. Meltwater. https://www.meltwater.com/en/blog/media-in-belgium
Das Erste. (n.d.). Jahresbilanz 2020. https://www.daserste.de/specials/ueber-uns/jahresbilanz-2020-100.html
DBpedia. (2024). TVN24. https://dbpedia.org/page/TVN24
Eurotopics. (n.d.). El Mundo. https://www.eurotopics.net/en/148523/el-mundo
European Journalism Centre. (n.d.). Greece. Media Landscapes. https://medialandscapes.org/country/greece
European Parliament. (2024 March 19). Documento del Parlamento Europeo. https://www.europarl.europa.eu/doceo/document/E-9-2024-000823_IT.html
Federal Department of Foreign Affairs FDFA. (2023, December 28). Media. About Switzerland. https://www.eda.admin.ch/aboutswitzerland/en/home/wirtschaft/taetigkeitsgebiete/medien.html
Feedspot. (2024 May 17). Top 20 Bulgaria news websites. Feedspot. https://journalists.feedspot.com/bulgaria_news_websites/
Forbes (2022, July 20). Під ознаки олігархів в Україні підпадають 86 осіб – секретар РНБО. Forbes Ukraine. https://forbes.ua/news/pid-oznaki-oligarkhiv-potraplyayut-86-osib-sekretar-rnbo-20072022-7273
Henley, J. (1 July, 2020). France gives tax credits to news subscribers in effort to rescue sector. *The Guardian*: Retrived 06.11.2024 from: https://www.theguardian.com/world/2020/jul/01/france-gives-tax-credits-to-news-subscribers-in-effort-to-rescue-sector
IMM. (2023 February 28). Raport opiniotwórcze media. https://www.imm.com.pl/wp-content/uploads/2023/03/IMM_-raport_opiniotw%C3%B3rcze_media_-_luty_2023.pdf

Kampanje. (2024, February). NRK's flaggskip har mistet 140 000 seere på tre år. Kampanje. https://kampanje.com/premium/februar-2024/innsikt/nrks-flaggskip-har-mistet-140000-seere-pa-tre-ar-den-som-spar-dagsrevyens-dod-forregner-seg/
Konrad-Adenauer-Stiftung. (n.d.). TV stations. https://www.kas.de/en/web/balkanmedia/tv-stations
Media Landscapes. (n.d.). France - Media landscape. https://medialandscapes.org/country/france
Media Landscapes. (n.d.). Latvia. https://medialandscapes.org/country/latvia/media/print
Media Landscapes. (n.d.). Print media in Norway. https://medialandscapes.org/country/norway/media/print
Media Landscapes. (n.d.). Radio in Italy. https://medialandscapes.org/country/italy/media/radio
Media Landscapes. (n.d.). Spain. https://medialandscapes.org/country/spain
Media Landscapes. (n.d.). Switzerland. https://medialandscapes.org/country/switzerland
Media Landscapes. (n.d.). Ukraine. https://medialandscapes.org/country/ukraine
Medialandscapes (n.d.). United Kingdom. https://www.medialandscapes.org/country/united-kingdom
Transparency International. (n.d.). Bulgaria. Transparency International. Retrieved October 10, 2024, from https://www.transparency.org/en/countries/bulgaria
Trifonova Price, L. (2022). Between a rock and a hard place: continued struggle of media and journalism in Bulgaria's media system. https://www.intellectbooks.com/61-proposals-for-journalism

6 CONCLUSIONS

The EU's recent experiences in dealing with the financial crisis, the COVID-19 pandemic and the ongoing war in Ukraine, demonstrate the vital role of strategic communication in maintaining public trust and unity among member states. Over the past decade, the EU has confronted unprecedented levels of disinformation, much of which has been targeted and amplified by foreign actors seeking to undermine its cohesion and domestic and international legitimacy. These disinformation campaigns have contributed to the rise of Euroscepticism, fostering divisions and fueling nationalist movements that challenge the foundational values of the Union. Against this backdrop, the EU's approach to communication has evolved to meet the dual demands of transparency and resilience, but significant challenges remain.

A key aspect of this evolution has been the EU's shift from a purely informational approach to one that also aims to engage citizens. Historically, EU communication focused on rational explanations of policy achievements, which were effective during times of stability. However, in crisis periods, a purely rational approach has proven insufficient. During the COVID-19 pandemic and the war in Ukraine, it became clear that the EU must also appeal to the emotions and identities of its citizens.

The EU's response to these communication challenges has been multifaceted. At the institutional level, efforts to improve transparency and fight disinformation have included initiatives like the establishment of the East StratCom Task Force and the EU Action Plan Against Disinformation. Additionally, the introduction of the Rapid Alert System and cooperation with digital platforms are essential steps in detecting and countering disinformation in real-time. These measures demonstrate the EU's commitment to a proactive approach to disinformation, focusing on coordination and rapid response across its institutions and member states. However, despite these advancements, the scale and sophistication of disinformation campaigns—often amplified by digital platforms—reveal the limitations of existing countermeasures.

Another layer of complexity lies within the EU's diverse media landscape. Digitization has transformed the European media environment, with social media and digital platforms taking on an increasingly prominent role in shaping public opinion. This shift has heightened concerns about media concentration, algorithm-driven news feeds, and the spread of misinformation, all of which impact the

Funded by the European Union

EU's ability to communicate effectively. The rapid and pervasive dissemination of false information challenges traditional media's role as a trusted news source, and the proliferation of biased or politically influenced content has further fragmented the media space. The EU's response has involved advocating for media literacy, promoting media pluralism, and strengthening regulatory frameworks to ensure transparency and accountability in digital platforms. Still, achieving these goals remains difficult in a landscape where media consumption habits vary widely across member states.

The EU faces the imperative of enhancing its strategic communication in three critical areas. **First, it has to strengthen its internal communication frameworks to foster cohesion across member states.** Rather than viewing communication solely as the responsibility of EU institutions, national leaders and local actors should be encouraged to act as co-owners of the EU narrative. This means aligning national and EU-level messaging to ensure that the benefits of EU actions are clearly communicated.

Second, the EU should continue developing its disinformation countermeasures, especially in the context of external risks and threats. Given the significant influence of state-sponsored disinformation campaigns from actors like Russia and, to a lesser extent, China, the EU's current strategies—though robust—need to be adaptable to evolving tactics. Strengthening partnerships with digital platforms and enhancing fact-checking networks will be crucial, as will further regulatory measures such as the Digital Services Act, which aims to increase accountability and transparency among tech companies.

Third, the EU has to be more active in fostering media literacy and critical thinking skills among its citizens. As digital platforms become primary sources of information, educating the public on recognizing disinformation and making informed choices becomes essential. Programmes that promote media literacy across member states can empower citizens to navigate through complex information landscapes, reducing the influence of fake news and building resilience against polarizing narratives. This focus on education not only strengthens individual media skills but also fosters a more informed, engaged, and cohesive European society.

While the EU has made substantial progress in adapting its communication strategies to a rapidly changing media environment, challenges remain. The rise of nationalist and Eurosceptic movements, fueled by disinformation and exacerbated by crisis events, poses a persistent and even increasing threat to the EU's unity and legitimacy. Meeting these challenges will require a continuous commitment to strategic communication that combines factual clarity with emotional resonance. The EU's future success in maintaining its values and unity will depend on its ability to foster coherent society, which is resilient to both external manipulation and internal division.

Funded by
the European Union

Review Sheet of Deliverable/ Milestone Report
D4.2 Deliverable Title: Working Paper 2 "Information manipulation in the EU media ecosystem and response effectiveness"

Editor(s):	Inna Šteinbuka, Žaneta Ozoliņa (LATVIJAS UNIVERSITATE / UNIVERSITY OF LATVIA - UL) Alessia D'Andrea, Arianna D'Ulizia (CONSIGLIO NAZIONALE DELLE RICERCHE - CNR-IRPPS) Pascaline Gaborit, Joen Martinsen (PILOT4DEV - P4D) Alona Hryshko (INTERNEWS UKRAINE - IUA)
Responsible Partner:	LATVIJAS UNIVERSITATE / UNIVERSITY OF LATVIA (UL)
Status-Version:	0.1
Date:	31/12/2024
Distribution level (CO, PU):	PU
Reviewer (Name/Organization)	Despina Elisabeth Filippidou, Anastasios Manos / DOTSOFT
Review date	25/11/2024

Disclaimer: This assessment reflects only the author's views and the European Commission is not responsible for any use that may be made of the information contained therein"

Funded by the European Union

Mark with X the corresponding column:

Y= yes	N= no	N = not applicable

ELEMENT TO REVIEW	Y	N	NA	COMMENTS
FORMAT: Does the document … ?				
…include editors, deliverable name, version number, dissemination level, date, and status?	Y			
…contain a license (in case of public deliverables)?			NA	
…include the names of contributors and reviewers?	Y			
….has a version table consistent with the document's revision?	Y			
… contain an updated table of contents?	Y			
… contain a list of figures consistent with the document's content?			NA	
… contain a list of tables consistent with the document's content?			NA	
… contain a list of terms and abbreviations?	Y			
… contain an Executive Summary?	Y			
… contain a Conclusions section?	Y			
… contain a List of References (Bibliography) in the adequate format, if relevant?	Y			References are included per Section, not all available in one Appendix
… use the fonts and sections defined in the official template?	Y			
… use correct spelling and grammar?	Y			
… conform to length guidelines (50 pages maximum (plus Executive Summary and annexes)	Y			~54 PAGES
… conform to guidelines regarding Annexes (inclusion of complementary information)			NA	
… present consistency along the whole document in terms of English quality/style? (to avoid accidental usage of copy&paste text)	Y			
About the content…				
Is the deliverable content correctly written?	Y			
Is the overall style of the deliverable correctly organized and presented in a logical order?	Y			

Funded by the European Union

ELEMENT TO REVIEW	Y	N	NA	COMMENTS
Is the Executive Summary self-contained, following the guidelines and does it include the main conclusions of the document?	Y			
Is the body of the deliverable (technique, methodology results, discussion) well enough explained?	Y			
Are the contents of the document treated with the required depth?	Y			
Does the document need additional sections to be considered complete?	Y			
Are there any sections in the document that should be removed?		N		
Are all references in the document included in the references list?			NA	Yes, per section where they appear
Have you noticed any text in the document not well referenced? (copy and paste of text/picture without including the reference in the reference list)		N		
SOCIAL and TECHNICAL RESEARCH WPs (WP4, 5, 12, 13, 14)				
Is the deliverable sufficiently innovative?	Y			
Does the document present technical soundness and its methods are correctly explained?	Y			
What do you think is the strongest aspect of the deliverable?				The strongest aspect of the deliverable lies in its comprehensive and multidisciplinary approach to tackling disinformation within the EU media ecosystem. It combines theoretical analysis, practical case studies, and actionable policy recommendations, offering a nuanced understanding of the challenges and responses to disinformation. The focus on diverse strategies, such as enhancing media literacy, fostering critical thinking, and leveraging advanced

Funded by the European Union

ELEMENT TO REVIEW	Y	N	NA	COMMENTS
				technologies like AI for detection, ensures a holistic perspective. Moreover, its alignment with key EU legislative frameworks, such as the Digital Services Act, and its focus on platform-specific challenges like algorithmic filtering and echo chambers on TikTok and Telegram, make it a highly relevant and practical contribution to combating disinformation at both institutional and societal levels.
What do you think is the weakest aspect of the deliverable?				The weakest aspect of the deliverable lies in its **limited emphasis on measurable outcomes and actionable strategies**. While it provides an in-depth analysis of disinformation challenges and existing initiatives, it lacks a robust framework for evaluating the effectiveness of these initiatives. The deliverable could benefit from more concrete metrics, case-specific data, or examples demonstrating the real-world impact of proposed solutions. Additionally, while it discusses platform-specific challenges, the strategies outlined often remain high-level, without delving deeply into the technical or operational feasibility of addressing these issues. This limits the practical applicability of the insights, particularly for stakeholders

ELEMENT TO REVIEW	Y	N	NA	COMMENTS
				seeking to implement immediate interventions.
Please perform a brief evaluation and/or validation of the results, if applicable.				The deliverable effectively integrates multidisciplinary insights and diverse data sources to address disinformation challenges, aligning well with EU objectives. Its strong focus on media literacy, institutional responses, and platform-specific strategies provides valuable guidance. However, adding empirical validation or actionable outputs, like benchmarks or pilot case studies, could further enhance its impact and practical applicability.
AI AND TECNOLOGICAL WPS (WP6 – WP11)				
Does the document present technical soundness and the methods are correctly explained?				
What do you think is the strongest aspect of the deliverable?				
What do you think is the weakest aspect of the deliverable?				
Please perform a brief evaluation and/or validation of the results, if applicable.				
DISSEMINATION AND EXPLOITATION WPs (WP15 – WP17)				
Does the document present a consistent outreach and exploitation strategy?				
Are the methods and means correctly explained?				
What do you think is the strongest aspect of the deliverable?				
What do you think is the weakest aspect of the deliverable?				
Please perform a brief evaluation and/or validation of the results, if applicable.				

Funded by the European Union

SUGGESTED IMPROVEMENTS

PAGE	SECTION	SUGGESTED IMPROVEMENT
7	Executive Summary	Include key statistics or metrics to quantify the impact of disinformation and the effectiveness of EU measures.
16	EU Citizens' Perceptions	Provide a visualised way – graphs / charts of Eurobarometer survey data, focusing on trends over time and regional variations.
54	Conclusions	Summarize specific, actionable recommendations for stakeholders, categorized by policymakers, platforms, and educators.
40	Media Landscape per Country	Add quantitative data to compare media environments across countries, such as press freedom scores or trust levels.

CONCLUSION

Mark with X the corresponding line.

X	Document accepted, no changes required.
	Document accepted, changes required.
	Document not accepted, it must be reviewed after changes are implemented.

Please rank this document globally on a scale of 1-5 (1 = poor, 5= excellent) – using a half point scale.
Mark with X the corresponding grade.

Document grade	1	1.5	2	2.5	3	3.5	4	4.5	5
								X	

Funded by the European Union