

ONLINE DISINFORMATION IN EUROPE

A STUDY ON ETHICAL STANDARDS, INVOLVED POLITICAL
INTERESTS AND POLICY RECOMMENDATIONS



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COMMISSION

This study was undertaken by the Media Verification (MeVer) team of the Multimedia Knowledge and Social Media Analytics Laboratory (MKLab) of the Information Technologies Institute (ITI), part of the Centre for Research and Technology Hellas (CERTH). The study was commissioned by The Left group in the European Parliament - GUE/NGL. www.left.eu

ABOUT MEVER

The Media Verification (MeVer) team is a team of research scientists, operating under the Multimedia Knowledge and Social Media Analytics lab, with a focus on the study of online disinformation and research and development of tools and methods for the detection and mitigation of disinformation, primarily in relation to multimedia content (e.g. media forensics, deepfake detection, etc.) and social media analytics. mever.iti.gr

ABOUT MKLAB

The Multimedia Knowledge and Social Media Analytics Laboratory (MKLab) has extensive experience and expertise in semantic multimedia analysis, indexing and retrieval, social media and big data analytics, knowledge structures, reasoning and personalization for multimedia applications, eHealth and environmental applications. mklab.iti.gr

ABOUT ITI

The Information Technologies Institute (ITI) was founded in 1998 as a non-profit organization under the auspices of the General Secretariat of Research and Technology of Greece, with its head office located in Thessaloniki, Greece. Since 2000, it is a founding member of the Centre of Research and Technology Hellas (CERTH). ITI is one of the leading Institutions of Greece in the fields of Information and Communication Technologies. www.iti.gr

ABOUT CERTH

The Centre for Research and Technology-Hellas (CERTH), founded in 2000, is a leading Research Centre in Greece and in the EU. It is a legal entity governed by private law with non-profit status, supervised by the General

Secretariat for Research and Technology (GSRT) of the Greek Ministry of Development & Investments. Climate change, sustainable energy, artificial intelligence, advanced robotics, Internet of Things, holistic approaches to healthcare and nutrition, autonomous vehicles smart cities of the future and circular economy are the primal fields around which CERTH's five (5) institutes are organized. Chemical Process & Energy Resources Institute - CPERI, Information Technologies Institute - ITI, Hellenic Institute of Transport - HIT, Institute of Applied Biosciences - INAB, and Bio-economy and Agro-Technology Institute, bring together more than 1100 people (engineers and scientists in their majority), in 6 regions and 7 cities. www.certh.gr

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ABBREVIATIONS

AGCOM	Autorita per le garanzie nelle comunicazioni
AVMSD	AudioVisual Media Services Directive
CIGI	Centre for International Governance Innovation
CNMC	National Commission of Markets and Competition
CSA	Conseil Supérieur de l'Audiovisuel
DMA	Digital Markets Act
DSA	Digital Services Act
EC	European Commission
EDMO	European Digital Media Observatory
EEAS	European External Action Service
EFJ	European Federation of Journalists
EPRA	European Platform of Regulatory Authorities
ERGA	European Regulators Group for Audiovisual Media Services
GDPR	General Data Protection Regulation
HLEG	High-Level Expert Group
IFCN	International Fact-Checking Network
IFJ	International Federation of Journalists
KPI	Key Performance Indicator
NCRTV	National Council for Radio and Television
NRA s	National Regulatory Authorities
OECD	Organisation for Economic Co-operation and Development
PSM	Public Service Media
UN	United Nations
UNESCO	United Nations Educational, Scientific and Cultural Organization



EXECUTIVE SUMMARY

As online disinformation is increasingly entering the centre stage of public discourse as a crucial problem for democratic societies, it becomes clear that the phenomenon is highly complex and multidimensional, and calls for a nuanced understanding and mapping of the involved actors and the overall landscape. In particular, there is a need to map the role of media and journalism in maintaining high ethical standards in terms of truthful and impartial reporting, and to investigate the ways that particular political interests and actors are associated with and benefit from the spread of disinformation narratives across Europe. Furthermore, there is a need for designing a balanced and comprehensive set of policies that can mitigate the effects of disinformation in Europe and ultimately address the underlying factors that are responsible for its growth.

To this end, this study has set the following three objectives: a) to investigate whether there are in place measures and/or journalistic authorities that supervise and monitor the ethical application of journalism at a European level; b) to identify patterns of false information spreading as a means to serve the agenda and interests of political groups, exploring who spreads such false information and who benefits from it; and c). to analyse and summarize the specific and tangible policies that have been proposed by European and international organisations to tackle online disinformation in order to formulate a policy recommendation to the audience of the report.

The study has primarily focused on the state of journalistic authorities and standards and the analysis of disinformation in relation to political interests in five EU countries (France, Germany, Greece, Italy and Spain), and it has drawn attention to three topics that are often contentious and offer fruitful ground for the spread of disinformation (COVID-19, immigration and climate change). Furthermore, it has summarized and classified best practices and policy recommendations to counter online disinformation.

Our key findings include the following:

- The primary organizations overseeing the application of ethical standards in journalism in Europe are the European Regulators Group for Audiovisual Media Services (ERGA), the European Federation of Journalists (EFJ) and the International Fact-Checking Network (IFCN). European countries follow their own national codes of ethical conduct, though there are certain commonalities across the conducts and truthful reporting is among these common principles. An additional important reference document in Europe is the Code of Practice on Disinformation, which includes relevant commitments on behalf of social media platforms and internet advertising companies. Finally, our study points that complying with ethical standards is increasingly challenging for news organizations and journalists due to the 24/7 news lifecycle, the reliance on Internet advertising as a primary source of income and several other factors that affect media independence and plurality. Yet, failure to comply with ethical standards is found as a reason for the reduced trust of citizens in media.
- Among the three topics of focus for our study, disinformation was prevalent with respect to COVID-19 and immigration and much less pronounced with respect to climate change. At an EU and national level, we found evidence that COVID-19 related disinformation more often originates or is disseminated by right wing parties and politicians, while at an international level disinformation campaigns targeting European citizens appear to mainly originate from Russia and China and primarily target Germany and Italy. On the topic of immigration, we could identify several disinformation activities, featuring anti-immigrant narratives and sentiments, racist and xenophobic attitudes that were aligned with the agenda and ideology of far-right and right-wing parties and sometimes pro-Kremlin media amplify the messages of far-right politicians (e.g. in Germany); however, there is no evidence of any kind

of cooperation or coordination between them. On the topic of climate change, there seems to be a shift from climate change denialism to scepticism, but in general it appears that European countries are not fertile ground for climate change disinformation.

- There is already a number of reports that recommend concrete policies and measures with a view to mitigating the effects of disinformation and limiting its root factors. Our analysis of existing recommendations highlights that the phenomenon of disinformation cannot be addressed with fragmented, one-dimensional or simply regulatory policies. It calls for a multi-dimensional, multi-faceted, multi-stakeholder policy framework that assigns fair responsibility to and requires decisive action from all relevant stakeholders. In particular, we present a six-dimensional policy framework that could be a useful reference for discussions among policy makers and other stakeholders. The recommended policies are

organized in the following six dimensions: a) enhancement of the transparency of the digital media ecosystem; b) cultivation of media literacy and digital skills in different groups of citizens; c) empowerment of different groups of stakeholders, including platform users, citizens, and journalists; d) strengthening media independence and pluralism; e) promotion of ethical conduct in media, journalism and platforms; and f) support of independent research on monitoring the disinformation phenomenon and building services and tools for countering online disinformation.

We believe that this study could be a useful tool for researchers and policy makers who are interested in better understanding the aforementioned aspects, and even though we recognize a number of limitations, we consider that it could serve as a valuable reference on deliberations around the topic and future research.

INTRODUCTION

BACKGROUND

Information disorder refers to the ways in which the information environment is polluted. Although, information disorder has become an ever-growing issue nowadays with vast and in some cases devastating consequences,^{1,2} it is not new.³ Politicians, corporations as well as the media have been benefitting from information disorder and even engaged in disinformation strategies to achieve their own agendas for a very long time. Motivations behind the use of false information vary significantly but, in most cases, aim at increasing one's power and influence, be it political, social or economic, or at steering public opinion towards certain directions, including adopting opinions or narratives that are favourable to those spreading disinformation. Politicians in particular are interested in increasing their public support, gaining influence on political decision-making and ultimately increasing their electoral power.

During the recent years, there is a surge in the use of the term “fake news” when referring to false information and information disorder phenomena. Nevertheless, in this report we consciously choose to avoid using this term, because it does not fully describe the context of information disorder. Importantly, this term is increasingly politicised and vastly used by politicians as a label to delegitimise political opponents or any news that they do not agree with. To this end, we opted for the terminology proposed by the study of Wardle and Derakhshan,⁴ which includes three types of information disorder: mis-information, dis-information and mal-information. This categorisation is based on two criteria: whether the information used is false and whether the motive behind the spread of information is to cause harm.

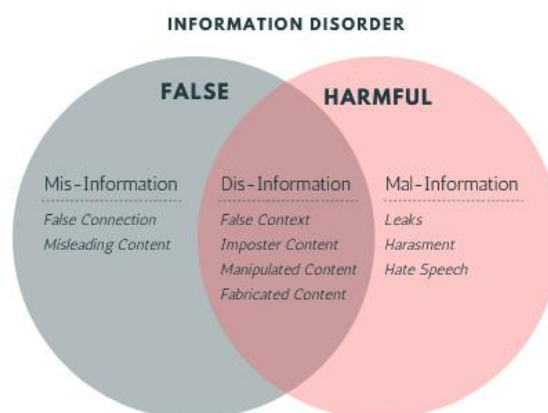


Figure 1 - Information disorder: misinformation, disinformation and malinformation. Source: Information Disorder: Toward an interdisciplinary framework for research and policy making by Claire Wardle and Hossein Derakhshan

As shown in **Figure 1**, *misinformation* is about sharing information that is not true, but without an obvious aim to cause harm. This includes, for example, unintentional mistakes about facts or misleading content, which however is not harmful. Clickbait or sensational titles used in some articles can be considered as mis-information, since they manipulate the information shared to gain traction but not necessarily to cause harm. *Disinformation* contains false information that is deliberately created and used in order to cause harm and to serve personal interests. Finally, *malinformation* includes true information that is deliberately shared in order to harm anyone involved such as individuals, organisations or countries. Leaks, harassments and hate speech can be considered as malinformation. Wardle, in

¹ <https://www.ndtv.com/world-news/coronavirus-misinformation-on-Covid-vaccines-resulting-in-people-dying-who-warns-2565266>

² <https://www.scientificamerican.com/article/Covid-misinformation-is-killing-people1/>

³ <https://www.bbc.co.uk/bitesize/articles/zwcgn9q>

⁴ <https://edoc.coe.int/en/media/7495-information-disorder-toward-an-interdisciplinary-framework-for-research-and-policy-making.html>

'Fake News. It's Complicated'⁵ has also presented seven different types of mis- and disinformation. These include *satire or parody, misleading content, imposter content, fabricated content, false connection, false context and manipulated content*. Being aware of these types can be helpful in better understanding, reasoning about and tackling the complex nature of information disorder. In our study, the focus is placed on disinformation rather than mal- and misinformation.

With the emergence of the Internet (the EU internet penetration was 89% in 2020⁶) and especially the explosion of social media, the way information is produced and distributed has significantly changed. Since it is now much easier for anyone to create and publish content, it is also easier to create, publish and spread false content. Additionally, the consumption of information has become easier by anyone with Internet access. Yet, it has been found that false information reaches more people quicker than true information.⁷ For example, the interactions of Facebook users with deceptive sites in 2020 was larger than 1.5B in the US alone.⁸ Adding to this, the use of printed news has fallen considerably since 2016 while the use of digital news has increased, especially after the pandemic of Covid-19, according to the Digital News Report (2021)⁹ of the Reuters Institute, which is facilitating the more rapid spread of information. Based on the same Reuters Institute Report, almost 73% of the population uses their smartphone to access news – increased from the 69% of 2020. Information is also shared via private channels and messaging applications, like telegram, which makes it harder to control and fact-check.¹⁰

A key enabler of disinformation especially on social media is the rapid advances of technologies such as bots and other methods that rely on artificial intelligence. For example, a study conducted in 2017¹¹ found that around 23M of Twitter accounts (8.5% of all accounts) and 140M of Facebook accounts (up to 5.5% of all accounts) are bots. Importantly, such technologies combined with the wide reach and advertising capabilities offered by mainstream digital platforms, such as Facebook, that enable the targeting of individuals and populations with customized messaging at massive scales further exacerbate the problem and have a negative effect when they aim to manipulate the public towards a specific stance, whether this regards elections, decisions upon health-related issues or any other topic.

The challenge of disinformation is global, but our study focuses on Europe. As pointed out in the 2018 report of the High-Level Group¹² (HLEG), there are four main actors involved in disinformation in Europe: political actors, news media, citizens and civil society, and digital media. Disinformation is an issue that concerns everyone, from the governing actors of Europe to regular citizens. The Digital News Report 2021⁹ found that 54% of European citizens are concerned about it, a percentage that has increased after the Covid-19 pandemic.

OBJECTIVES OF THE STUDY

This study revolves around three objectives aiming to contribute towards a better understanding of a) the state of ethical application of journalism in Europe in relation to disinformation (Objective A); b) the disinformation landscape, and in particular the involvement of political actors, exploring who is spreading disinformation and who benefits from its spread (Objective B); and c) policy interventions and other measures that can be adopted to limit the involvement of political actors in disinformation activities (Objective C).

Through Objective A, the study investigates whether there are in place measures and/or journalistic authorities that monitor the ethical application of journalism at a European level. In addition, the study investigates the implications from non-compliance to such ethical standards, as well as the challenges that arise when trying to ensure such compliance.

Through Objective B, the study identifies patterns of spreading false information as a means to serve the agenda and interests of political groups, exploring who spreads disinformation and who benefits from it. We focus on three different topics: Covid-19, immigration and climate change, all pertaining to salient and often polarized issues in the public discourse, and highly associated with disinformation based on previous research. Since it would be very effort-intensive to study disinformation in all EU member states, we studied a few representative EU countries, as case studies: France, Germany, Greece, Italy and Spain. The main criterion is to include in our analysis some of the biggest EU countries, but also countries with specific characteristics in terms of disinformation (i.e. the level of citizens' trust in media and politicians) Therefore, in the analysis there are both countries with a high level of trust and countries that have among the lowest rates in EU.

5 <https://firstdraftnews.org/articles/fake-news-complicated/>

6 <https://www.internetworldstats.com/stats9.htm>

7 Vosoughi, S., Roy, D., & Aral, S. (2018). The spread of true and false news online. *Science*, 359(6380), 1146-1151.

8 <https://www.gmfus.org/news/engagement-deceptive-sites-facebook-and-twitter-dropped-first-months-2021>

9 https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2021-06/Digital_News_Report_2021_FINAL.pdf

10 <https://edoc.coe.int/en/media/7495-information-disorder-toward-an-interdisciplinary-framework-for-research-and-policy-making.html>

11 de Lima Salge, C. A., & Berente, N. (2017). Is that social bot behaving unethically?. *Communications of the ACM*, 60(9), 29-31.

12 <https://digital-strategy.ec.europa.eu/en/library/final-report-high-level-expert-group-fake-news-and-online-disinformation>

Finally, through Objective C, the study aims to investigate the specific and tangible policies that have been proposed by European and international organisations to tackle online disinformation. Additionally, we select and propose a set of responses/measures that can be adopted by the EU but also the media to effectively address disinformation in Europe.

METHODOLOGY

The methodology underpinning this study aimed at a comprehensive treatment of the three set objectives and an impartial extraction of evidence from the multitude of sources with the aim of offering support to European policy makers and political actors in conducting better informed discussions on the matter and making decisions on concrete evidence.

To address objectives A and B, we carried out two independent systematic desk research studies. These studies were synthetic in nature, since they relied on the analysis of a multitude of existing public sources, including the following:

- official public studies and reports conducted on behalf of the EU and international organisations;
- research papers and articles published in established peer-reviewed scientific journals and conferences;
- articles published in established non-partisan magazines and newspapers, in European as well as US websites;
- sources suggested by experts that the study authors consulted, including EU Disinfo, Maldita, Pagella Politica, Deutsche Welle, Global Disinformation Index, NewsGuard, University of Rome Tor Vergata, and the European University Institute;
- fact-checking reports by numerous European IFCN-approved organisations (e.g., EUvsDisinfo, Maldita.es, Ellinika Hoaxes, France24, corrective.org)
- public official documents for incidents related to disinformation by news organizations and the respective sanctions;
- statistics by websites (e.g., Statista.com, Eurobarometer).

The keywords used for search, the articles and reports included in this study were mainly in English, but part of the research was also made in the national languages of the selected countries. The timeframe of the online search included the last five years (from 2016 until today). The year 2016 was selected as starting point of the analysis, as 'fake news' became popularized and politicized, as a term during the American Presidential Elections of 2016, and since then its use in the public discourse has grown rapidly.¹³ In Europe, the rise of 'fake news' was mainly observed in the 2017 French General

Elections and the German Federal elections of the same year. In general, elections served as milestones in our search, since disinformation typically spreads widely during the electoral period. Hence, in the timeframe of our search, there are results during the period of at least, the most recent General election for each country of the study, and also during the elections of the European Parliament of 2019. Another milestone is The Covid-19 pandemic that attracted most of the public's attention and it has been at the centre of numerous disinformation campaigns (often collectively referred to as *infodemic*) during the last couple of years.

For objective C, we examined policy recommendations made by seven studies from i) the European Commission and EC institutions or committees like the High Level Group on "Fake news and online disinformation", the European Policy Centre, and the Council of Europe; as well as ii) international organisations like the OECD, the UN and UNESCO. Consequently, a disinformation policy classification framework has been created, aiming to efficiently analyse, synthesize and summarise these policy recommendations. This framework gives a clear picture of what measures/policies different researchers and organisations consider important in the fight against disinformation.

Our research and the writing of this study was guided by the following principles:

- Reliance on impartial and neutral sources. It was crucial during the research to identify credible sources that are not partisan and report facts and evidence in an objective way.
- Independent analysis. Even though the study was commissioned by members of the European Parliament associated with the Left, the research team conducted the study in a fully autonomous way without any intervention by the EP members, beyond interim checks to monitor progress.
- Objectivity in reporting. We made every possible effort to avoid expressing directly or indirectly any personal opinion or stance by the authors in this document. Instead, we limited ourselves to analysing, synthesizing, summarizing and interpreting conclusions and evidence from primary sources.
- Transparency. The researchers involved in the execution of the study have no direct or indirect association or affiliation with any political party or fraction. In addition, they have no further benefit or dependence on the content and conclusions this study.

Conducting this study, we encountered a few challenges and limitations that we need to acknowledge:

- Language limitations. Considering that a large portion

¹³ Lazer, D. M., Baum, M. A., Benkler, Y., Berinsky, A. J., Greenhill, K. M., Menczer, F., & Zittrain, J. L. (2018). The science of fake news. *Science*, 359(6380), 1094-1096.

of the research was focused on the five countries of interest (France, Germany, Greece, Italy and Spain) the sources in a language that we could understand at a native speaker level were limited. Some facts and examples may not be present in the study due to the fact that they were not reported in English.

- Scope of cases under study. The study focused on disinformation and political interests, especially in relation to the second objective. Therefore, general and popular cases of disinformation with no specific political dimensions were not part of the study, which in a way limits the range of discussed examples. It is worth noting that deciding whether to include a case in our analysis was itself a challenging task since it was on the one hand unclear whether the case could be classified as disinformation (since this implies an intention to mislead) and on the other it was not obvious whether there was a direct link/association to political interests.
- Content limitations. It proved particularly challenging to find reliable sources reporting on climate change disinformation in Europe. Although, several sources and studies were available for this topic in other parts of the world like the US, the available sources on this subject for Europe were limited.

KEY FINDINGS

Objective A: Ethical Standards in Journalism

1. Organisations overseeing the Ethical Application of Journalism

We identified and examined three different types of organisations concerned with the ethical application of journalism: regulatory bodies of audiovisual media services, unions of journalists, and fact checking organisations. The general overview of the media sector in Europe is the duty of ERGA (European Regulators Group for Audiovisual Media Services). The members of ERGA are national independent regulatory bodies of the different European countries. Regarding the countries of interest, each has their own regulatory body (member of ERGA), which is responsible to assure certain quality standards for radio and TV content and has the power to impose sanctions. Several sanctions have been imposed by these organisations, nevertheless most of them are not directly connected with disinformation; possible reason behind this fact may be the difficulty in monitoring of the disinforming statements as well as the distinction between disinformation and opinion. With regard to the unions of journalists, the largest one in Europe is the EFJ (European Federation of Journalists) whose members are either individual journalists or national organisations of

journalists. EFJ members have to follow a set of principles in order to retain membership rights. Finally, fact-checking organisations are independent organisations who seek to identify errors or false information in the news. The largest fact-checking organisation is the IFCN (International Fact-checking network), which includes organisations focused on fact-checking from around the world. IFCN members have to abide by a set of principles including non-partisanship and fairness, transparency of sources, transparency of funding and organisation, transparency of methodology and open and honest corrections.

2. The Code of Practice on Disinformation

An important reference document, part of the EU's effort to tackle disinformation is the code of practice on disinformation.¹⁴ The code includes certain commitments that bodies and associations, mainly social media platforms and organisations related to advertising and marketing, have to follow. These commitments regard the scrutiny of ad placements, political and issue-based advertising, the integrity of services, the empowering of consumers and the empowering of the research community. Even though the framework is not directly related to journalism, it is a reference for sound practices in online social networks and the advertising industry.

3. Journalistic Codes of Ethical Conduct

Our research also looked into journalistic codes of ethical conduct both at the European level as well as at the national level in the countries of interest. What was discovered is that different countries adopt different codes of conduct, sharing however some common principles. Some of these aim at avoiding disinformation whereas others aim to guide journalists to better working methods. The principles common among national codes of conduct and the EFJ include truthfulness of information, integrity of information, gathering and presenting information, protection and respect of the source, serving the interests of the society, and respect of diversity, dignity and privacy.

4. Implications and Challenges of Compliance

Media compliance with ethical standards has become harder in the era of rapid technological advancements and breakthroughs in the digital media. The transformation of the traditional news cycle to 24/7 news production affects the ability of newsrooms and journalists to properly verify information or consider and report all aspects relevant to a topic. Additionally, it has been found that media objectivity varies among different media and countries. For example, public service media have a stricter code with regard to unbiased and

¹⁴ <https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>

politically neutral presentation of news while private news companies and digital news outlets may more often lean towards specific partisan views in terms of news coverage and audience demographics. At the same time, studies show that the public sees an increase in media outlets and journalists following the agenda of political and corporate elites.

The main issue arising from the non-compliance of media to the ethical standards is the erosion of citizens' trust in media. Multiple studies have shown that the trust of citizens in media decreases with the increase of disinformation and that it has fallen significantly during the last few years. Traditional media are still considered the most trusted and accurate by both experts and audience whereas online news and social media considerably less. Varying levels of trust also tend to reflect the underlying political and social situation in each country. In addition, political polarisation and populism seem to shape the public's trust in media, leading citizens in highly polarised countries as well as people with extreme political views to being increasingly distrustful of mainstream media. Despite the explosion of disinformation and the erosion of public trust, media independence and objectivity are still highly appreciated by the majority of EU citizens whereas "fake news" are considered a significant problem that poses a threat to society and democracy.

Finally, with regard to media transparency and independence, there is a lot of concern for the impact of big advertisers on media independence, especially in today's media landscape where several media organisations are struggling, due to declining audiences and loss of advertising share to online media. Media owners (usually wealthy business people) and advertisers may affect newsroom ethos and undermine journalistic independence. This is why transparency with regard to media owners, media funding, journalistic sources, and paid advertisement is important, as well as establishing a strong culture of integrity and ethics compliance in the newsroom. Finally, freedom of the press and independence plays an important role in allowing journalists to adhere to even the most basic standards of ethical conduct.

Objective B: Political interests served

With regard to Objective B, we examined examples of disinformation campaigns in five EU countries (France, Germany, Greece, Italy and Spain) with regard to i) the Covid-19 Pandemic, ii) Immigration, and iii) Climate Change. These countries have been selected to compare how disinformation is spread in different media systems and political contexts. Our main intention was to explore and wherever possible point out the association of disinformation campaign activities with political actors,

parties and interests. In some cases, it proved easier to identify who is behind or is associated with disinformation campaigns, or at least who are the beneficiaries; in other cases, this turned out to be difficult, often depending on the topic of the disinformation campaign or the target.

In our study, we found out it easier to identify patterns and links of disinformation with political interests and actors in the context of Covid-19 pandemic discussions, mainly due to the salience of the issues, the extensive spread of disinformation and the plethora of information and data available. The most common means used to spread disinformation are social media, with messaging apps also being popular. Although not all disinformation regarding Covid-19 has been associated with political interests, on a national and EU level, our analysis suggests that such disinformation more often originates from or is spread by right wing parties and politicians. Furthermore, on the international level, relevant disinformation campaigns targeting EU citizens have been launched by Russia and China. The countries mostly targeted by these campaigns were Germany and Italy.

On issues related to immigration, disinformation targeted immigrants, refugees and minorities (mostly Muslims and Roma). In this case, we could identify links with political interests and actors, mainly due to the anti-immigrant narratives, anti-immigrant sentiments, racist and xenophobic attitudes that this kind of disinformation is based on, and which reflect the main aspects of the ideology and the political agenda of the far-right and right-wing parties. Therefore, on a national and EU level, anti-immigrant disinformation is mostly associated with far-right parties or extreme-right media as the disinformation propagators, and in some cases even with mainstream right-wing parties. As for the foreign sources of anti-immigrant disinformation, there are examples showing that pro-Kremlin disinformation media amplify the messages of far-right politicians (e.g. in Germany); however, there is no evidence of any kind of cooperation or coordination between them.

Climate change is the issue where the least volume of disinformation was found and where evidence was inconclusive or unclear in making clear the association of disinformation with political interests. Although climate change disinformation is widely spread in the US and there is a plethora of information and news regarding this issue, the findings of our study about climate change disinformation in EU countries were limited. In between opinions and facts, false information is circulated in the local media and in some cases is associated with far-right political actors (e.g. in France). Disinformation mostly focuses on the anthropogenic perspective of the climate change, and it is often limited to the denial of the existence and the urgency of climate change, rather than

promoting false information about the issue itself. In the past years, denialism has been more common especially among right wing parties, but currently there is a tendency towards scepticism, e.g. by downplaying the risks stemming from a changing climate or questioning the effectiveness of the measures proposed to tackle climate change nationally and at a European level.

Objective C: Policy recommendations

Disinformation is a complex phenomenon that requires complementary policies that will try to effectively tackle the different political, civic, social and media issues involved. Several studies have been undertaken and a variety of proposals have been made during the past few years, many of which were initiated by EC institutions. Chapter 4 presents the main policy recommendations from these efforts, along with guidelines and recommendations produced by international organisations like the OECD, the UN and UNESCO.

To efficiently study and eventually summarize and synthesize these policy recommendations, we propose a classification framework for disinformation policies. This is inspired by the pillars of the HLEG report on “Fake news and online disinformation”, the pillars of the EC Communication on the “European Democracy Action plan”, and the typology of the ITU/UNESCO Broadband Commission for Sustainable Development report on “Freedom of expression and addressing disinformation on the Internet”. It includes six main dimensions, several policy categories per dimension, and numerous policy responses per category.

The first dimension regards enhancing the transparency of the digital media ecosystem. The proposed measures apply to online advertisement, political messaging and funding, algorithms and data, and content and content sources, and are addressed to platforms, media, advertisers, governments and political actors.

The second dimension includes policies to enhance media literacy in different groups of citizens and promote the development of skills that will allow navigating the digital media environment confidently and knowledgably and participating in the public dialogue responsibly.

Another group of recommendations aims to empower different groups of stakeholders, including platform users, citizens, and journalists, to use platforms and digital media to their benefit for better communication, information and engagement. Those aim to give users agency over their data and online experience, citizens a voice in online policy debate and access to reliable data, and journalists the necessary resources and knowledge to provide high-quality and accurate news.

The fourth dimension focuses on policy measures that

aim to strengthen media independence and pluralism, ensuring media independence, plurality and freedom of expression, on one hand, and supporting the sustainability of the media ecosystem on the other.

Another set of recommendations concern the promotion of ethical conduct in journalism, media and platforms. To this end, platforms, media, fact-checking organisations, and governments should work together to enforce clear and acceptable rules of conduct and operation. This can be done either by following a self-regulatory approach that allows journalists and platforms to set their own codes and rules or by applying governmental regulations to media and platforms and monitoring compliance through independent authorities.

Finally, there are policy responses that include monitoring and research of the disinformation phenomenon, on one hand, and undertaking actions or developing services to directly respond to disinformation, on the other, e.g. by debunking false claims that are potentially harmful to free elections and democracy in general, public health or national security.

The phenomenon of disinformation cannot be addressed with fragmented, one-dimensional or simply regulatory policies. It calls for a multi-dimensional, multi-faceted, multi-stakeholder policy framework that assigns fair responsibility to and requires decisive action from all relevant stakeholders. The framework should consider responses along different complementary dimensions, including education, platform regulation, media freedom and diversity, user empowerment, journalistic ethos and practices, open government, election integrity, research for new tools and technologies, exchange of information and knowhow, etc., to combat disinformation in a holistic and efficient way.

OUTLINE OF THE STUDY

The rest of this report is divided in three chapters, one per study objective. Chapter 2 examines the ethical standards and codes of conduct in journalism, including journalistic authorities for the ethical application of journalism, the ethical codes and principles journalists have to comply with in the countries of interest, and the implications of non-compliance and the challenges that arise when trying to ensure compliance. Chapter 3 presents the results of our research about disinformation in Europe and its connection with political interests, with regard to the specific topics of Covid-19, immigration and climate change in the five countries of interest. Chapter 4 collects and analyses a set of policy recommendations towards addressing the challenge. Finally, in the Annexes we present the Codes of Conduct that are studied in Chapter 2 and the proposed policy recommendation framework.

ETHICAL STANDARDS IN JOURNALISM

This chapter presents the journalistic authorities that monitor and supervise the ethical application of journalism in Europe as well as the ethical codes and principles that the journalists have to comply with. Additionally, it discusses the implications stemming from non-compliance to these standards, as well as the challenges arising when trying to ensure compliance.

ORGANISATIONS

Regulatory bodies of media services

The European Regulators Group for Audiovisual Media Services¹⁵ (ERGA) is the main regulatory body at a European level connecting the high-level representatives of national independent regulatory bodies in the field of audiovisual services. Its objectives are:

- to advise and assist the Commission in its work, to ensure a consistent implementation of the AudioVisual Media Services Directive¹⁶ (AVMSD) as well as in any other matters related to audiovisual media services within the Commission's competence.
- to facilitate cooperation between the regulatory bodies in the EU, as provided for in the directive regulating audiovisual media services.
- to allow for an exchange of experience and good practices.

Members of ERGA are national independent regulatory bodies; **Figure 2** illustrates these bodies for the countries of interest.

In addition, the European Platform of Regulatory Authorities¹⁷ (ERPA) brings together the largest network or broadcasting regulators. As stated in their website, "EPRA has an informal character to encourage a frank and open exchange of views on issues pertaining to the application of media regulation. Its statutes expressly prohibit the adoption of common positions or declarations." Members of EPRA are regulatory authorities from 47 different countries and they have regular contacts with other regional networks of NRAs in Europe, such as ERGA. For the countries of interest, the EPRA members are the same as those of ERGA (**Figure 2**).

EPRA connects the different regulatory bodies but does not have a formal character. Each national or regional body has their own regulations that the media have to comply with. In the following, we provide information about these bodies in the countries of interest.



Figure 2 - Regulatory bodies of Audiovisual services

France

The Conseil Superieur de l'Audiovisuel¹⁸ (CSA) is an independent administrative agency of the government whose task is to ensure that the law on communication is applied by radio and television broadcasting organisations. The main directions to follow originate from the law firstly created in 1986 and then enriched following European directives. This law grants to CSA some competences such as monitoring on the matters of content as well as entail penalties or a formal demand. The content topics that are under the control of CSA regard matters of pluralism, child protection, dignity of the person, incitement to violence or hatred for reasons of race, gender, religion or ethnicity and fairness in the news. For other domains such as issues of the programme quality, social cohesion or the representation of diversity the CSA has the right to act as well.

As an enforcement mechanism, CSA has the right to apply to the non-compliant a formal notice as well as penalties

¹⁵ <https://erga-online.eu/>

¹⁶ <https://digital-strategy.ec.europa.eu/en/policies/audiovisual-and-media-services>

¹⁷ <https://www.epra.org/articles/general-information-on-epra>

¹⁸ <https://www.csa.fr/>

and fines. These decisions have to be checked by legal authorities to be finalised. For less important violations, CSA can also offer recommendations or deliberations on the expectations regarding the respect of the principles¹⁹ the principle of respect for private life. During the show, the hosts initiated a live telephone conversation without disclosing the fact to the people they had the conversation with, which resulted in the latter to unknowingly disclose personal information publicly.²⁰ Additionally, in 2018 a set of laws were published in France that aim to fight information manipulation,²¹ and among others propose ways to mitigate the influence of false information on the election process.²²

Germany

Medienanstalten is the umbrella organisation of 14 media authorities in Germany and their responsibilities²³ cover the radio and television broadcasters. They are responsible for licenses and supervision of the broadcasters, they monitor compliance with advertising rules and provisions, they support the introduction of new broadcasting technology, and they advocate securing diversity in private broadcasting.²⁴

Regarding programme supervision, they principles²⁵ that the broadcasters have to respect include human dignity, ethical, ideological and religious convictions, the legal system and the journalists' obligation to exercise diligence. Additionally, they have principles that the journalists need to respect in order to ensure quality standards. These include observation of truth and human dignity; differentiation between advertising and editorial content, avoiding one-sided reporting and respecting the rights of individuals and preventing discrimination. Apart from the programme supervision, they monitor advertising ensuring compliance with advertising standards that include aspects regarding separation and identification of advertising, duration of advertising, content requirements for advertisements and prohibited advertising.²⁶

The Medienanstalten have the power to initiate oversight proceedings against violators and impose fines. For

example, in 2016 they found that a program was violating journalistic principles by using unfair research methods, since the presented information was obtained using a hidden camera.²⁷

The regulations the media should follow come from the Rundfunkstaatsvertrag²⁸ (Interstate Broadcasting Agreement) and influenced by the AudioVisual Media Services Directive (AVMSD²⁹). Adding to the sanctions that can be imposed by the Medienanstalten, there are paragraphs in the German penal law³⁰ that condemn the spread of false information and news. Another law that was voted in 2017 is the Network Enforcement Act³¹ that is focused on the false information spread in social media. This act requires social networks to implement specific complaint procedures, forcing them to remove user content that violates a list of criminal provisions within seven days of receiving notification. The responsibility to enforce the German laws falls under the jurisdiction of the German court.³²

Greece

The responsibilities of the National Council for Radio and Television (NCRTV) cover only the broadcasting. NCRTV has the following roles³³:

- supervise the content of radio and TV programs
- set codes of conduct for news broadcasters as well as entertainment and advertising programmes
- grants, renews and revokes licenses for the operation of radio and television stations
- monitors the compliance of the rules of ethics (Annex II), the completeness of the programmes, the pluralism of information, the protection of minors and the respect of human value
- in terms of the ownership status of the private media, it monitors the compliance with applicable law restrictions.

In case of violation of the law, it imposes fines or other sanctions, while for serious cases it can revoke operating licenses.³⁴ Adding to the regulations set and monitored by

19 <https://www.csa.fr/Reguler/Comment-le-CSA-peut-il-sanctionner/Differentes-sanctions-possibles>

20 <https://www.csa.fr/Informer/Espace-presse/Communiqués-de-presse/Procédure-de-sanction-a-l-encontre-de-C8-amende-de-3-millions-d-euros>

21 Law 2018-1201 and 2018-1202

22 <https://thelawreviews.co.uk/title/the-technology-media-and-telecommunications-review/france#footnote-009-backlink>

23 <https://www.die-medienanstalten.de/en/about-the-media-authorities/responsibilities>

24 <https://www.die-medienanstalten.de/en/about-the-media-authorities>

25 <https://www.die-medienanstalten.de/en/areas-of-interest/programme-supervision>

26 <https://www.die-medienanstalten.de/en/areas-of-interest/monitoring-of-advertising>

27 <https://www.die-medienanstalten.de/service/pressemitteilungen/meldung/zak-entscheidet-ueber-verstoesse-aus-programm-und-werbung>

28 https://www.die-medienanstalten.de/fileadmin/user_upload/Rechtsgrundlagen/Gesetze_Staatsvertraege/RStV_22_english_version_clean.pdf

29 https://www.die-medienanstalten.de/fileadmin/user_upload/Rechtsgrundlagen/Gesetze_Staatsvertraege/Audiovisual_Media_Service_Directive_en.pdf

30 Paragraph 109d of the Penal Law: https://www.gesetze-im-internet.de/englisch_stgb/englisch_stgb.html

31 https://www.bmiv.de/DE/Themen/FokusThemen/NetzDG/NetzDG_node.html

32 <https://thelawreviews.co.uk/title/the-media-and-entertainment-law-review/germany>

33 <https://www.esr.gr/>

34 <http://repository-esr.ekt.gr/esr/handle/20.500.12039/18413>

the NCRTV, there are laws^{35,36} that include sanctions if someone transmits false information and news. The body responsible to overview and monitor media is the General Secretariat of Communication and Information, and more specifically the Media Surveillance Directorate.³⁷

Italy

The Autorita per le garanzie nelle comunicazioni (AGCOM)³⁸ has the objective to promote media pluralism, the competitiveness of the telecom market and consumer protection. It performs regulatory and supervisory functions in the telecommunications, audiovisual media, publishing and postal service sectors.

The competences of AGCOM in the field of audiovisual media concern the monitoring and regulating of advertising and telemarketing, the protection of minors, ensuring the right of rectifications and monitoring of the radio and TV broadcasts.

In case of non-compliance with the necessary regulations regarding programmes, advertising and audiovisual content, AGCOM has the power to impose sanctions such as initiate disciplinary proceedings.^{39,40} Adding to the sanctions that AGCOM is able to impose, there is also a law⁴¹ about sharing false, enlarged or prejudiced information that might jeopardize public order.⁴²

Spain

The National Commission of Markets and Competition⁴³ (CNMC) is an independent body recognized by law that guarantees, preserves and promotes the proper operation and transparency in a number of economic sectors and areas of interest such as energy, telecommunications, competition, railways, post, airports and audiovisual media.

The main responsibilities of CNMC related to audiovisual matters include: control of content to ensure it complies with legislation of protection of minors, advertising and accessibility, monitoring of compliance with European directives, oversight of compliance with public service mission, reporting on draft regulations, resolution of disputes among agents involved in audiovisual markets,

resolution of sanctioning cases and reporting related to violations of the regulations, recommendations to violators of regulations, cooperation with autonomous communities and participation in international activities.⁴⁴

CNMC has some penalty powers relating to audiovisual matters, especially on topics regarding protection of minors, advertising limits, media pluralism, cultural and linguistic diversity consumer protection, accessibility and non-discrimination. The different penalties can be distinguished in three levels, minor, serious and very serious infringements. Indicative examples: a minor infringement could be an unjustifiable delay in a response required in accordance with this law, a serious infringement could be the failure to comply with the instructions and decisions of the audiovisual authority, and a very serious infringement could be discrimination on the grounds of birth, race, sex, religion, nationality, opinion or any other personal or social circumstances.⁴⁵ For example, in 2016 a Spanish TV broadcaster was fined 270K euros for transmitting a movie with the indication “suitable for all audiences”. After investigation, they concluded that this indication was against the law since the movie contained audiovisual content that was inappropriate for minors.⁴⁶

Unions of Journalists

The largest organisation of journalists in Europe is the European Federation of Journalists⁴⁷ (EFJ), representing over 320,000 journalists in 72 journalists’ organisations across 45 countries. In order for an organization to be able to become a member of the EFJ, it has to be a member of the International Federation of Journalists⁴⁸ (IFJ), the world's largest organisation of journalists.

Members of EFJ have to follow the “IFJ Global charter of ethics for Journalists⁴⁹”, which can be found in Annex I. In short, the principles regard:

- truthfulness of information
- integrity of information
- gathering and presenting information
- defending the right of freedom of speech

35 Article 191 penal code: <https://www.lawspot.gr/nomikes-plerofories/nomothesia/n-4619-2019/arthro-191-poinikos-kodikas-nomos-4619-2019-diaspora>

36 Article 7 of law 3340/2005: <https://www.lawspot.gr/nomikes-plerofories/nomothesia/n3340-2005/arthro-7-nomos-3340-2005>

37 <https://media.gov.gr/organogramma/diefthynsi-epopteias-meson-enimerosis/>

38 <https://www.agcom.it/home>

39 <https://rm.coe.int/the-independence-of-media-regulatory-authorities-in-europe/168097e504>

40 https://www.agcom.it/documents/10179/23188308/Delibera+139-21-CSP/ec905cac-dc5d-4e2f-9eca-e1ffb398d2dc?version=1_0

41 Codice penale, LibroIII-Dellec ontravvenzioni in particolare Art.656, <https://www.brocardi.it/codice-penale/libro-terzo/titolo-i/capo-i/sezione-i/art656.html>

42 <https://www.rcmediafreedom.eu/Tools/Legal-Resources/Tackling-fake-news-the-Italian-way>

43 <https://www.cnmc.es/en>

44 <https://www.cnmc.es/en/ambitos-de-actuacion/audiovisual>

45 <https://rm.coe.int/the-independence-of-media-regulatory-authorities-in-europe/168097e504>

46 <https://www.cnmc.es/expedientes/sncdtsa00616>

47 <https://europeanjournalists.org/>

48 <https://www.ifj.org/>

49 https://www.ifj.org/fileadmin/user_upload/GLOBAL_CHARTER_OF_ETHICS_FOR_JOURNALISTS_-_EN.pdf

- protecting and respecting of the source
- serving the interest of the society
- respecting diversity, dignity and privacy
- solidarity to colleagues

More details of the above categories will be given in the next section. EFJ members have to follow the above charter as well as some other conditions defined in the IFJ Constitution.⁵⁰ If they do not comply, the Executive Committee can make a provisional decision to expel them after proper investigation. Later on, the decision can be finalised or reversed by the Congress of IFJ. For example, the National Federation of Israel Journalists was expelled, but it was due to financial matters and not related to compliance with the ethics code.⁵¹ EFJ members are national journalists' organizations; **Figure 3** illustrates these for the countries of interest.



Figure 3 - Unions of Journalists

International Fact-checking Network (IFCN)

Fact-checking is a process that seeks to identify whether there are errors or false information in news pre or post dissemination. Currently there are several independent organisations that focus on fact-checking,⁵² trying to reduce disinformation in Europe, both private and public as well as non- and for-profit. As stated by the Duke Reporters' Lab,⁵³ there was a rapid expansion of fact checking organisations since 2016, and they now reach 341 organisations worldwide.

The International Fact-checking network (IFCN), launched in 2015, brings together fact-checking organisations

worldwide. IFCN is committed to promoting excellence in fact-checking. Any legally registered organization set up for the purpose of fact-checking and is not controlled by the state can become member of IFCN and obtain the IFCN verification. Members have to follow the IFCN fact-checkers' code of principles,⁵⁴ which can be found in Annex I. In short, the signatories are committed to:

1. **Non-partisanship and fairness:** They follow the same process for every fact check and do not advocate or take positions.
2. **Transparency of sources:** They make sure their sources are either publicly available or if that is not possible they provide as much detail as possible.
3. **Transparency of funding and organization:** They have to be transparent with respect to their funding sources and the funding organizations should not have any influence on their operations.
4. **Transparency of methodology:** They should explain what methodology they use to fact-check.
5. **Open and honest corrections:** They follow the corrections policy and make sure readers have access to the corrected versions.

The members of IFCN⁵⁵ are monitored yearly to check whether they are following the aforementioned principles and if not, they are removed from the list and lose the IFCN verification.⁵⁶ So far, there are 25 organisations,⁵⁵ some of them quite well known such as Snopes, of which the certification has expired and they did not go through the renewal process and therefore are removed from the list. **Figure 4** depicts IFCN members for the countries of interest. More fact-checking teams that are not necessarily members of IFCN but are based in the EU can be found in the EDMO listing.⁵⁷

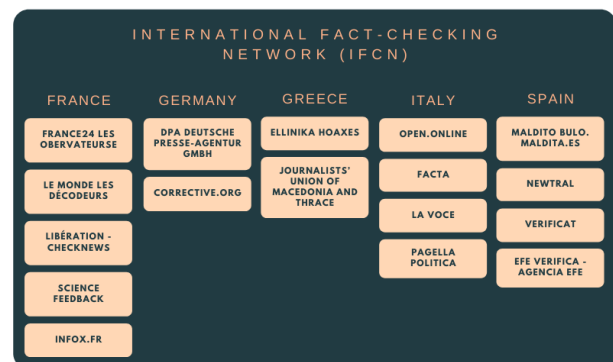


Figure 4 - Fact-checking organisations

⁵⁰ <https://www.ifj.org/who/rules-and-policy/constitution.html>

⁵¹ <https://www.ifj.org/media-centre/news/detail/article/ifj-and-national-federation-of-israeli-journalists.html>

⁵² <https://edmo.eu/fact-checking-activities/>

⁵³ <https://reporterslab.org/fact-checking-census-shows-slower-growth/>

⁵⁴ <https://www.ifcncodeofprinciples.poynter.org/>

⁵⁵ <https://ifcncodeofprinciples.poynter.org/signatories>

⁵⁶ <https://www.ifcncodeofprinciples.poynter.org/process>

⁵⁷ <https://edmo.eu/fact-checking-activities/>

Another relevant organisation is the European External Action Service's (EEAS) East Stratcom Task Force through its EUvsDisinfo project. Its main purpose is to “forecast, address, and respond to the Russian Federation’s ongoing disinformation campaigns”.⁵⁸ To this end, their main field of operation regards educating the public about the Kremlin’s disinformation operations to be able to resist media manipulation. They expose disinformation cases that originate from pro-Kremlin media, mostly from Russian and eastern European (e.g., Ukraine) media, and compile a database with those cases and their debunks. Paul Butcher in his article “Disinformation and democracy: The home front in the information war”⁵⁹ has a critical stance on the role of the Task Force, identifying a few issues:

- Even though the Task Force does not have a domestic role, they do evaluate domestic media.
- Even though the original purpose of EU vs Disinfo was to deal with pro-kremlin disinformation, nowadays they try to cover the entire European media space.
- There is no structured and consistent approach on identifying pro-kremlin stories and verifying they indeed originated from Russia.
- There is no clear audience, even though they seem to direct to the general public the tone of writing is often “derisive or dismissive”.
- The quality of their work depends on the available budget and staff of the current period which means that they may contribute to disinformation instead of minimizing it.

The article concludes that for the Task Force to properly provide serve its mission, some changes should occur: e.g., be moved from the EEAS to the EC or restrict its operations towards analysing Russian or Eastern European media.

European Commission code of practice on disinformation

An additional reference document on disinformation in Europe - not directly related to journalism- is the code of practice on disinformation⁶⁴ created by the European Commission. The code of practice on disinformation includes some commitments that several bodies and trade associations⁶⁰ (mainly social media platforms and organisations related to advertising and marketing), from now on referred to as Signatories, have agreed upon that

can be found in Annex I and are described in short below.

- **Scrutiny of ad placements:** They should recognise that advertisements may promote disinformation and therefore they should deploy policies and processes to avoid such cases.
- **Political advertising and issue-based advertising:** They should understand the importance of the political and issue-based advertising, its effect on the public opinion and the necessity of its transparency; therefore, they should comply with European law as well as disclose all necessary information.
- **Integrity of services:** They should acknowledge the importance of preventing misinformation and misinterpretation through services and therefore create policies that help them identify the identity and the misuse of automated bots and define the impermissible use of other automated services.
- **Empowering consumers:** They should understand the importance of consumers being able to access trustworthy information and therefore produce, invest or create technologies, features and indicators that support them through information seeking and evaluation.
- **Empowering the research community:** They should acknowledge the necessity of measures that enable privacy compliant access to data for fact-checking and research activities and therefore support the efforts towards tackling disinformation through research and academic discussions.

The Signatories of the code have to comply with the commitments described above. For the purpose of measuring and monitoring their compliance, a set of Key Performance Indicators (KPIs) shall apply to the Signatories with respect to the aforementioned commitments. These are described in the code of practice as well. To evaluate and verify the compliance an annual review is being held, if it is decided that the Signatory does not comply adequately to the commitments made, then the rest of the Signatories may invite it to withdraw from the code. Additionally, any Signatory can willingly withdraw from the code at any time.

Considering that monitoring the implementation of the commitments made by the signatories is a complicated task, ERGA has agreed to assist the European Commission with it.⁶¹ To this end ERGA publishes several documents⁶² to evaluate or improve the implementation of the code of ethics on disinformation such as the “ERGA Report on

⁵⁸ <https://euvsdisinfo.eu/about/>

⁵⁹ <https://www.epc.eu/en/publications/Disinformation-and-democracy-The-home-front-in-the-information-war~21c294>

⁶⁰ These are: Google, Facebook, Twitter, Microsoft, TikTok, Mozilla, DOT Europe (Former EDiMA), the World Federation of Advertisers (WFA) and its Belgian counterpart, the Union of Belgian Advertisers (UBA); the European Association of Communications Agencies (EACA), and its national members from France, Poland and the Czech Republic – respectively, Association des Agences Conseils en Communication (AACC), Stowarzyszenie Komunikacji Marketingowej/Ad Artis Art Foundation (SAR), and Asociace Komunikacnich Agentur (AKA); the Interactive Advertising Bureau (IAB Europe), Kreativitet & Kommunikation, and Goldbach Audience (Switzerland) AG.

⁶¹ <https://erga-online.eu/?p=732>

⁶² https://erga-online.eu/?page_id=14

disinformation: Assessment of the implementation of the Code of Practice”⁶³ or the “ERGA Recommendations for the new Code of Practice on Disinformation.”⁶⁴

JOURNALISTIC CODES OF ETHICAL CONDUCT - MAIN PRINCIPLES

In Europe, different media or journalistic organisations adopt different codes of conduct that they commit to follow, as explained in the previous paragraph. Nevertheless, all of them have some common points and they generally cover similar categories of ethical conduct. Some of them are necessary for avoiding misinformation and others exist for guiding the journalists into better working methods. The main categories of ethical conduct that we identified are summarised below:

1. **Truthfulness of information:** The first obligation is to respect, preserve and transmit the truth.
2. **Integrity of information:** Journalists should strive for the integrity of the information; this consists of presenting accurate, fair, objective and impartial information as well as correcting any mistakes that they may have committed.
3. **Gathering and presenting information:** The means of gathering information should be fair and without taking advantage of their source or using any other dishonest methods.
4. **Defend the right of freedom of speech:** They have to defend the right of publishing and accessing information and the right of speech and criticism.
5. **Protection and respect of the source:** They have to keep professional secrecy and protect the source as well as respect their wishes to not share information.
6. **Serve the interest of the society:** They have to serve solely the interest of the society by not serving any personal interests or accepting bribes, by not serving the interest of others, and by not differentiating information with the purpose of advertising.
7. **Respect diversity, dignity and privacy:** They have to ensure that the information they share does not contribute to discrimination of any kind, preserve the human dignity and respect people’s privacy.
8. **Solidarity to colleagues:** They have to respect their colleagues and their secrecy and avoid obstructing their investigation.
9. **Respect of state institutions:** They have to respect state institutions and not step in their role.
10. **Protect press credibility:** They should not publish any non-factual information that can compromise the credibility of the press, nor use incorrect or inappropriate language.
11. **Assumes responsibility:** They have to assume responsibility for what they write.
12. **Medical and investigative reporting:** Any reported medical information should be scientifically proven to avoid creating unfounded hope or fear and prevent risky decisions that could adversely harm individuals’ health.
13. **Employment circumstances:** The employment circumstances in the journalistic organization should be adequate to guarantee the necessary independence.
14. **Presumption of innocence:** They should maintain the principle that a person is presumed innocent until proven otherwise.
15. **Respect children, weak people and people with mental issues or disabilities:** Special respect and caution should be given when information regards minors, weak people or people with disabilities or mental issues.

Figure 5 illustrates the categories covered by the codes of conduct followed by EFJ members for the countries of interest based on data provided by Accountable Journalism,⁶⁵ a collaborative project created by Tampere University that collects data on ethical codes of conduct and press organisations, and on the codes of ethics by country.⁶⁶ The codes of conduct for these countries can be found in Annex II. According to **Figure 5**, some categories are covered by all or almost all ethical codes. All codes include commitments related to the information, such as truthfulness, integrity or the means of presentation and gathering. Considering these are the commitments made by journalists, it is understandable that reporting in a truthful manner is of highest priority. Additionally, two other important topics that are covered by most codes are respecting the source as well as serving the interest of the society. Relying on trustworthy sources gives to the journalist and to the content they publish credibility, which is of highest importance. Therefore, treating these sources with respect and caution is a necessity. Another important obligation of a journalist is to perform their job with the interest of society as a guiding compass. That is because journalism is an important tool of democracy and acting with any other interest in mind can lead to publishing false information. The rest of categories are less represented in the ethical codes under evaluation, even though they are no less important. These include topics like defending the right of freedom of speech, the presumption of innocence as well as respecting children, weak people and people with disabilities or mental health issues.

63 <https://erga-online.eu/wp-content/uploads/2020/05/ERGA-2019-report-published-2020-LQ.pdf>

64 https://erga-online.eu/wp-content/uploads/2021/11/ERGA-RECOMMENDATIONS-2021_11.pdf

65 <https://accountablejournalism.org/>

66 <https://research.tuni.fi/ethicnet/country/>

Codes of Ethics

CATEGORIES

	IFJ	EPJ	FRANCE	GERMANY	GREECE	ITALY	SPAIN	TOTAL
TRUTHFULNESS OF INFORMATION	✓	✓	✓	✓	✓	✓	✓	6
INTEGRITY OF INFORMATION	✓	✓	✓	✓	✓	✓	✓	6
GATHERING & PRESENTING INFORMATION	✓	✓	✓	✓	✓	✓	✓	6
PROTECTION & RESPECT OF THE SOURCE	✓	✓	✓	✓	✓	✓	✓	6
SERVE THE INTEREST OF THE SOCIETY	✓	✓	✓	✓	✓	✓	✓	6
RESPECT DIVERSITY, DIGNITY & PRIVACY	✓	✓	✓	✓	✓	✓	✓	6
DEFEND THE FREEDOM OF SPEECH	✓	✓		✓	✓	✓	✓	5
PRESUMPTION OF INNOCENCE			✓	✓	✓	✓	✓	4
RESPECT CHILDREN & VULNERABLE PEOPLE			✓	✓	✓	✓	✓	4
SOLIDARITY TO COLLEAGUES	✓	✓		✓	✓	✓	✓	5
RESPECT STATE INSTITUTIONS			✓			✓		2
PROTECT PRESS CREDIBILITY				✓	✓		✓	3
MEDICAL & INVESTIGATIVE REPORTING				✓	✓	✓		3
ASSUMES RESPONSIBILITY		✓						1
EMPLOYMENT CIRCUMSTANCES				✓			✓	2

Figure 5 - Categories covered by the ethical codes

IMPLICATIONS AND CHALLENGES OF COMPLIANCE WITH ETHICAL CONDUCT

Compliance with Ethical Standards

Compliance with ethical standards even among news organisations that voluntarily adopt such standards varies significantly, depending on media form and country.

Accuracy of information, truthfulness and integrity, has always been a cornerstone of ethical conduct and a key determinant of trusted news media.⁶⁷ However, with the explosion of new technologies and online media, the abundance of data and the consequent transformation of the traditional news cycle with fixed deadlines to a 24/7 news production process has put tremendous emphasis on news production speed. The pressure on journalists and newsrooms for continuous delivery of fresh news combined with the audience's gravitation towards outlets and platforms that report news first can erode journalistic standards of carefulness and accuracy,⁶⁸ since the need for speed reduces the time to properly verify information or consider and report all aspects relevant to a reported journalistic topic.⁶⁹ This effect is more prominent on TV,

radio and online news providers that place much more emphasis on getting the scoop and beating the competition in a 24-hour cycle than it is in traditional print press that may be able to do 'slow journalism', taking 'time to find things out, notice stories that others miss, and communicate it all to the highest standards'.⁷⁰

Objectivity is another important journalistic standard, the compliance to which may vary among different media or different countries.⁶⁷ In many cases, public service media have a stricter code when it comes to the unbiased presentation of news, emphasizing political neutrality and presenting all views without additional commenting, except for fact-checking purposes. However, many other media do not follow this neutral approach of impartial and balanced coverage, leaning very openly towards specific partisan views in terms of both news coverage and the demographics of their audience. Most mainstream media claim that they are objective; however, this is in many cases up to debate, since in various degrees they are often more friendly or biased towards specific points of view, although they adopt an external façade of a balanced reporting that in theory provides a platform for different views to be heard. The degree to which 'these leanings influence cherry-picking of facts, factual accuracy, the predominance of non-news opinion and commentators, audience opinion of the issues and candidates covered, visual composition, tone and vocabulary' is hotly debatable.⁶⁷

Freedom of the press plays an important role in allowing journalists to adhere to the standards of ethical conduct. For instance, in autocratic regimes, most of the journalists or media organisations and platforms cannot adhere to any kind of ethical conduct and in many cases can only survive by promoting propaganda and lies that align with the government's positions.

The Centre for International Media Ethics (CIME) conducted in 2017⁷¹ an international survey among media professionals, aiming to learn about the state of media ethics in their countries. Respondents indicated three main issues that they face with regard to the violation of ethical reporting fake news (58.3%), low pay (50%), pressure to provide news that attracts the largest audience (47.9%), and political or corporate spin (47.9%). In addition, the vast majority (90%) stated that they witnessed an increase in sensationalist and fake news in local/national media as well as an increase in the media outlets and/or journalists following the agenda of political and corporate elites (82.9%).

67 Salas, B. (2018) Basic Concept of Journalism, ED-Tech Press, https://books.google.gr/books/about/Basic_Concept_of_Journalism_Journalism_C.html?id=YaMswAEACAAJ

68 Rosenberg, H., & Feldman C. (2008). No Time to Think; The Menace of Media Speed and the 24-hour News Cycle. New York: The Continuum International Publishing Group <https://books.google.gr/books?id=5PgiNRL6K10C>

69 Drok, N. & Hermans, L. (2016) Is there a future for slow journalism? Journalism Practice, 10:4, 539-554, DOI: 10.1080/17512786.2015.1102604

70 Greenberg, S. (2007) Slow Journalism. Prospect, <https://www.prospectmagazine.co.uk/magazine/slowjournalism>

71 <https://mailchi.mp/77ba8dcf9ca7/media-ethics-in-the-post-truth-era-survey-results?e=5ab73e82c3>

Yet, journalists are not simple spectators of eroding ethical standards in the newsroom nor of the consequent erosion of public trust amid the real rise of online disinformation. A recent article⁷² presented a survey among US journalists examining how newsroom practices changed under the influence of misinformation and accusations against the news media. The study found that “journalists were most likely to cross-check with sources more often, limit the use of anonymity, and make it as clear as possible where the information comes from.” It also examined two types of professional practices related to the two core values in journalism, accountability and transparency. Results indicate increasing adoption by journalists of practices that enhance transparency, which may also be seen as a way for better connection with their audience. Moreover, journalists who perceive fake news as a threat to journalism and democracy were more likely to adopt or intensify such practices.

Trust of citizens in media

The lack of compliance with ethical codes of conduct and the increased spread of disinformation as a result of it, especially in the online unregulated environment, troubles European citizens and affects their trust in the media. In a survey conducted by the Reuters Institute in 2017,⁷³ journalistic processes such as sourcing and fact-checking and the transparency with which they are practiced were found to be the second most important reason to trust news media (22%), followed by the depth and quality of journalism (14%), and trusted brands (12%). Transparency of sourcing and correction of mistakes as well as good old-fashioned journalism with many sources was also seen as an important driver of trust in most countries. On the other hand, bias (general, political but also commercial) is the main reason for low trust in media (69%).

A Eurobarometer study conducted in February 2018 explored citizens’ trust in news and information accessed through different media channels as well as their perceptions with regard to disinformation (“fake news”).⁷⁴ The survey emphasized the importance of quality media: respondents considered traditional media as the most trusted source of information (radio 70%, TV 66%, print press 63%) while online news sources were considerably less trusted (only 47% of respondents trust online newspapers and magazines while video hosting websites and online social networks and messaging apps were trusted by only 26% of respondents).

One interesting outcome is that the level of trust on traditional media varies significantly among different countries. While the level of trust in television is as high as 83-90% in countries such as Finland, Denmark, Sweden, and the Netherlands, this percentage drops significantly in countries like Greece (40%), Hungary (48%), Poland (54%), Italy (56%) and Spain (57%). A similar picture is painted with regard to printed newspapers and news magazines. These varying levels of trust tend to reflect the underlying political and social situation of each country and how this affects citizens’ perceptions of media truthfulness and objectivity. Lower levels of trust are reported in countries like Greece, Spain or Italy that have been affected significantly by the Eurozone crisis or Hungary and Poland where far-right politicians that routinely attack media outlets are prevailing. Trust on online media on the other hand is considerably lower across all Europe since people consider them the main source of misinformation and partisan views.

According to the same study, citizens say they encounter fake news at least once a week, with seven out of ten being confident that they are able to identify such news. Again, these rates vary significantly per country: people in Spain, Hungary, Croatia, Poland, France, and Greece said that they come more often across fake news. In addition, citizens overwhelmingly think (85%) that fake news is a problem in their country and for democracy in general. When asked which institutions and media actors should act to stop the spread of disinformation, respondents thought journalists are the people most responsible to do this (45%), followed by national authorities (39%), press and broadcasting management (36%), and citizens themselves (32%).

A more recent international survey published by the Reuters Institute in 2020⁷⁵ has shown that public trust in media has fallen considerably during the last few years: currently in only six out of the 40 countries considered in the survey the media trust levels are above 50%.⁷⁶ At the same time, the majority in each country say they would prefer objective news from sources with no specific point of view, possibly reacting against a perceived increase in biased or opinion-based news. Public service media remain by and large the most trusted brands, especially in Northern European countries like Germany, Denmark, Finland, or UK where they have a strong tradition of independence while commercial broadcasters, online sources or tabloids are trusted the least although they

72 Vu HT, Saldaña M. Chillin’ Effects of Fake News: Changes in Practices Related to Accountability and Transparency in American Newsrooms Under the Influence of Misinformation and Accusations Against the News Media. *Journalism & Mass Communication Quarterly*. January 2021.

<https://journals.sagepub.com/doi/abs/10.1177/1077699020984781>

73 <https://reutersinstitute.politics.ox.ac.uk/our-research/bias-bullshit-and-lies-audience-perspectives-low-trust-media>

74 <https://europa.eu/eurobarometer/surveys/detail/2183>

75 https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf

76 Percentage of respondents that agree ‘they can trust most news most of the time’.

may be very popular among their audience. Brands that are most trusted are generally those that are known for lower levels of political partisanship, even in countries where political polarization is high. Some interesting example cases include the following:

- In **France**, the trust in the media is among the lowest at 24%. This may be partly attributed to the media coverage of the Yellow Vests protests.⁷⁵ Again, public media are more trusted while the most popular commercial TV channel is the most distrusted by far.
- In **Germany**, the trust in the media is at 45%. Public media such as ARD and ZDF remain the most trusted, while popular commercial broadcaster RTL and the Bild tabloid are the most distrusted.
- In **Spain**, the trust on news is at 36%. Trust in news declined more after the 2019 elections and especially coverage about Catalonia's separatist leaders and the relevant Supreme Court case.
- In **Italy**, trust is even lower at 29%. This is mainly attributed to the partisanship of Italian media and the influence of political and economic interests on the media (e.g. see the case of Silvio Berlusconi).
- In **Greece**, the distrust is also high due to the belief that most outlets (including the public broadcaster) are dependent on political or business interests. The most trusted source is a newspaper (Kathimerini) while the most distrusted are the SKAI TV channel and the Newsbomb online news site, both of which are interestingly the most popular in terms of viewership/visits.
- In **Hungary**, the trust in the media is at 27%, developing in a climate where accusations of disinformation and bias are very often. Despite the labelling of many independent outlets as 'fake news' by the government, the citizens trust these outlets much more than pro-government media, as pointed out in the Reuters report.

Although the level of trust in the media has declined, it is clear that media independence and objectivity are still highly appreciated by audiences, while partisan media, pro-government brands, and outlets strongly affiliated with business interests are reasons for low trust in the media. The same study showed that people with extreme political views are much less interested in objective news and increasingly distrustful of mainstream media.

In the same survey, fake news seemed to concern 56% of respondents across 40 countries. Respondents mainly seem to attribute disinformation spread to domestic politicians (40%), followed by political activists (14%), journalists (13%), ordinary people (13%), and foreign governments (10%). Although this may seem to paint a relatively favourable picture for media objectivity as

perceived by the public, there is more nuance to this. The authors of the study point out that political opinion makes a big difference when assigning responsibility for misinformation. Left-leaning audiences are far more likely to blame politicians for spreading disinformation, while right-leaning groups of citizens are more likely to blame the press, also encouraged by the 'lying media' narrative regularly adopted by right-wing politicians.

The public's trust on different media seems to coincide with expert assessments for the trustworthiness of outlets and their compliance with ethical standards of conduct. In another survey published in 2020,⁷⁷ the Reuters Institute compared the level of trust people have in 226 individual news outlets across 23 European countries with assessments of the same outlets from experts. The data shows a high correlation between the two and suggests that the more accurate experts rate a news outlet on average, the higher the average public trust in it. As shown in other studies, public service media are considered the most trustworthy and accurate by both experts and audience while digital platforms are rated the lowest.

Although there seems to be a direct link between adhering to ethical codes of conduct and increased trust in media, as is obvious from the results of the surveys presented above, the phenomenon is more complex. Political polarisation and populism play an important role in shaping the public's trust in media and in several cases invert what may be seen as a logical consequence. For example, as discussed in the survey of the Reuters Institute, people with strong partisan views tend to prefer media sources that offer opinions that coincide with theirs, even when there has been clear evidence that these outlets spread malicious disinformation. A prominent example in the US is the audience of Fox News. Although Fox News, in particular its opinion shows, have been consistently spreading disinformation and violating codes of ethics, its viewership has increased while its audience continues to trust Fox News against other media with a far better record of objectivity like the NYT or Washington Post. In this case, disinformation and unethical conduct do not seem to concern the outlet's audience; it even appears to feed its ideological predispositions and increase viewership, instead of turning it away.

Media transparency and independence

As shown above, bias, spin and political and commercial agenda are the main reasons for low trust in media.⁷³ A big part of the audience feel that the media are used by politicians and businesspersons for their own political or economic interests. Given that traditional media often

⁷⁷ <https://reutersinstitute.politics.ox.ac.uk/are-news-outlets-viewed-same-way-experts-and-public-comparison-across-23-european-countries>

struggle to survive economically in an increasingly digital environment, a plausible hypothesis is that owners, in many cases extremely wealthy businesspersons, are there for 'power, influence and access to the establishment'. Thus, it is not surprising to see owners interfering with the operation and ethos of their organisation.⁷⁸ For example, in the above survey,⁷⁷ many respondents from Greece talked about *"how the media is largely run in the interests of entrepreneurs, and that this is undermining journalistic independence and the ability of media companies to investigate political and business corruption"*.

Similarly, there is concern for the influence of big advertisers on media independence, especially in today's media landscape where several media organisations are struggling, especially newspapers, due to declining audience numbers and loss of advertising share to online media. The complex ways that the online advertising ecosystem works open up many opportunities to exert indirect influence on news organizations via controlling their level of funding from advertising sources.

In such an environment, journalists are often inclined or

even pressed to favour and promote specific points of view, with little consideration for information integrity or truthfulness. A strong culture of integrity, compliance and ethics, is not only a matter of personal journalistic conduct; it can only be established as a result of strong commitment from the highest levels of the media organization that will make clear that responsible delivery of accurate content is the main operating principle for everyone in the newsroom. It also involves creating the right balance between incentives and metrics.⁷⁹ Success should be redefined by each organization, considering not only viewership and profits, which are of course essential, but also integrity and quality.

To deal with issues of bias and influence, transparency is important. This involves transparency with regard to who owns or funds media organisations, transparency with regard to whether reporting has been partly funded by third parties and which ones, as well as transparency with regard to whether a piece of reporting is paid advertisement. Finally, transparency with regard to the sources used for supporting journalistic reporting.

⁷⁸ <https://www.democraticaudit.com/2013/12/18/the-political-affiliations-of-the-uks-national-newspapers-are-becoming-more-fluid/>

⁷⁹ https://www.ev.com/en_gr/forensic-integrity-services/how-media-organizations-can-get-real-and-confront-fake-news

POLITICAL INTERESTS SERVED

During the last decade, many “anti-establishment” politicians but also mainstream politicians have used extensively false claims to promote their political agenda on key issues. The issues surrounded by higher levels of misinformation strongly reflect national political agendas⁸⁰. In this report, we focus on disinformation and fake news related to three such salient issues: i) Covid-19, ii) immigration, and iii) climate change.

Social media platforms like Twitter and Facebook play a central role in the information ecosystem. However, they are also associated with disinformation and political propaganda⁸¹. In 2019 social media manipulation campaigns took place in 70 countries, and at least a political party or national government attempted to shape public attitudes in each country.⁸² An important motivation towards such increased creation and spread of disinformation is its potential impact on national politics, shaping the beliefs and behaviours of the electorate and in some cases affecting elections⁸³ or casting doubt on their results.⁸⁴

The role of disinformation and fake news in politics has been studied extensively, especially in US Politics during the last decade.⁸⁵ Since Donald Trump’s election, “Fake

News” has become a global term.^{86,87} In the 2016 US election, Trump consistently amplified conspiracy theories that would otherwise have been confined to fringe right-wing circles online, but instead gained traction and attention and got reported on a variety of mainstream news outlets, going from fringe speculation to mainstream media headlines.^{88,89,90}

There is evidence, also in Europe, that social media can be used to systematically manipulate and alter public opinion. For instance, in the 2017 French presidential election evidence shows that social bots drove the #MacronLeaks disinformation campaign.⁹¹ Remarkable exposure to online disinformation was observed in the 2018 Italian General Election.^{92,93} Disinformation campaigns were also noticed in the 2017 German federal elections, even at a regional level.⁹⁴

It has been shown that, particularly during political crises or elections, social media users tend to share more extremist, sensationalist, conspiratorial, and other forms of unsubstantiated content, along with content from reliable sources.⁹⁵ Extremist groups use social media for radical propaganda and recruitment efforts.⁹⁶ Foreign electoral intervention (i.e., from US, Russia, China) plays

80 Humprecht, E. (2018). Where ‘fake news’ flourishes: A comparison across four Western democracies. *Information, Communication & Society*, 22(13), 1973–1988. <https://doi.org/10.1080/1369118X.2018.1474241>

81 Ferrara, E., Varol, O., Davis, C., Menczer, F., & Flammini, A. (2016). The rise of social bots. *Communications of the ACM*, 59(7), 96–104

82 Bradshaw, S. & Howard, P. N. (2019) *The Global Disinformation Disorder: 2019 Global Inventory of Organised Social Media Manipulation*, Working Paper 2019.2. Oxford, UK, Project on Computational Propaganda

83 [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/653635/EXPO_STU\(2021\)653635_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/653635/EXPO_STU(2021)653635_EN.pdf)

84 <https://www.science.org/content/article/us-election-nears-researchers-are-following-trail-fake-news>

85 Shorey, S., & Howard, P. N. (2016). Automation, Big Data and Politics: A Research Review. *International Journal of Communication*, 10(24).

86 Bessi, A., & Ferrara, E. (2016). Social bots distort the 2016 US Presidential election online discussion. *First Monday*, 21(11)

87 Kollanyi, B., Howard, P. N., & Woolley, S. C. (2016). Bots and Automation over Twitter during the First U.S. Presidential Debate. *Data Memo 2016.1*. Oxford, UK: Project on Computational Propaganda.

88 El-Khalili, S. (2013). Social media as a government propaganda tool in post-revolutionary Egypt. *First Monday*, 18(3)

89 Forelle, M., Howard, P. N., Monroy-Hernández, A., & Savage, S. (2015). Political bots and the manipulation of public opinion in Venezuela. Available at SSRN 2635800.

90 Suárez-Serrato, P., Roberts, M. E., Davis, C., & Menczer, F. (2016). On the influence of social bots in online protests. In *International Conference on Social Informatics* (pp. 269–278). Springer International Publishing

91 Ferrara, E. (2017). Disinformation and social bot operations in the run up to the 2017 French presidential election. arXiv preprint arXiv:1707.00086.

92 Giglietto F., Iannelli, L., Rossi, L., Valeriani, A., Righetti N., Carabini F, et al. (2018). Mapping Italian News Media Political Coverage in the Lead up to 2018 General Election. Available at SSRN: <https://ssrn.com/abstract=3179930.2018>

93 AGCOM. News vs Fake nel sistema dell’informazione. Report available at: <https://www.agcom.it/documents/10179/12791486/Pubblicazione+23-11-2018/93869b4f-0a8d-4380-aad2-c10a0e426d83?version=10.2018>

94 Cresci, S., Di Pietro, R., Petrocchi, M., Spognardi, A., & Tesconi, M. (2017, April). The paradigm-shift of social spambots: Evidence, theories, and tools for the arms race. In *Proceedings of the 26th international conference on world wide web companion* (pp. 963–972).

95 Narayanan, V., Barash, V., Kelly, J., Kollanyi, B. (2018). Polarization, partisanship and junk news consumption over social media in the US, Comprop, February 2018

96 Ferrara, E. (2017). Contagion Dynamics of Extremist Propaganda in Social Networks. *Information Sciences* (in press). Available at SSRN: <https://ssrn.com/abstract=2982259>

a key role in disinformation campaigns worldwide and in Europe. The American alt-right, for example, contributed to disinformation campaigns during the 2016 American presidential election, the 2017 French presidential election, and the 2017 German federal elections.⁹⁷ Moreover, according to Le Monde, American billionaires with an affiliation to the Republican Party were involved in disinformation campaigns on digital platforms in Europe, spreading radical and divisive narratives during the 2019 EU elections.⁹⁸

Malicious actors often use fear, through hostile narratives (i.e. fear for losing health, wealth or identity),⁹⁹ which can be endorsed by different political actors (both liberals and conservatives) of the political spectrum.¹⁰⁰

Studies show that disinformation, regardless of topic, creates distorted beliefs about a political issue that can influence people's political views and as a result their voting behaviour on that issue even when controlling for pre-existing views and political sophistication^{101,102} and voting outcomes.^{103,104,105,106}

Focusing on three selected topics, Covid-19, immigration and climate change, we study disinformation in five EU countries: Greece, Germany, France, Spain and Italy. We explore disinformation in relation to political actors and interests and are guided by three main questions: i) who spreads disinformation (i.e. political actors, parties, interests); ii) how disinformation campaigns affect the political landscape, and iii) which political actors may benefit or be harmed the most from it.

GENERAL DISINFORMATION TOPICS

Covid-19

Disinformation spread in relation to Covid-19 is often referred to as an *infodemic*.^{83,107} According to a report¹⁰⁸ that combined information published by five European independent fact-checkers, the most common topics of

Covid19-related misinformation are the following:

- **The claim that the virus was man made:** this includes theories that the virus originated from the US or that it was created as a bio-weapon by the Chinese.
- **Cures and remedies:** this cluster of topics includes misinformation about medicine such as hydroxyloquinone and chlorine dioxide, also remedies that have no scientific base such as nicotine, gargling salt water, vinegar and drinking water, or even ways that you can tell if you are infected such as breathing tests (e.g. holding breath for 10 seconds).
- **Vaccine misinformation:** this includes disinformation about deaths of volunteers, mandatory vaccinations and more. Another topic related to vaccines and disinformation is spreading doubts about the safety of vaccines for humans. This belief is not new. The anti-vax movement has a long history and many followers.^{109,110} In 2019 (prior to Covid) a Eurobarometer poll found that almost half of Europeans believed that vaccines are dangerous.¹¹¹
- **Masks and personal protective equipment (PPE):** these include theories about the effectiveness of masks or claims that they are harmful.
- **5G misinformation:** the theories promote that 5G technology helps make worse or spread the virus.
- **Avoiding or preventing infection:** this type of misinformation usually includes partially true information along with inaccurate advice. For example, common false information was about the temperature that would kill the virus.
- **Bill Gates:** rumours were circulating that he already had a vaccine patent or that he was involved in the creation of the virus for personal gain.
- **Comparisons between coronavirus and seasonal flu:** this includes misleading comparisons between the flu and Covid-19, implying that the latter is not more or even less dangerous or transmissible than the flu.

97 https://www.atlanticcouncil.org/wp-content/uploads/2019/06/The_Macron_Leaks_Operation-A_Post-Mortem.pdf

98 https://www.lemonde.fr/pixels/article/2019/03/07/des-milliardaires-americains-financent-discretement-des-campagnes-de-desinformation-en-europe_5432486_4408996.html

99 Flore, M. (2020). Understanding Citizens' Vulnerabilities (II): from Disinformation to Hostile Narratives, EUR 30029 EN, Publications Office of the European Union, Luxembourg, 2020, ISBN 978-92-76-14308-6, doi:10.2760/271224, JRC118914

100 Wetherell, G., Brandt, M., & Reyna, C. (2013). Discrimination across the Ideological Divide: The Role of Value Violations and Abstract Values in Discrimination by Liberals and Conservatives, *Social Psychological and Personality Science*, Sage

101 Reedy, J., Wells, C., & Gastil, J. (2014). How voters become misinformed: An investigation of the emergence and consequences of false factual beliefs. *Social Science Quarterly*, 95(5), 1399-1418

102 Wells, C., Reedy, J., Gastil, J., & Lee, C. (2009). Information distortion and voting choices: The origins and effects of factual beliefs in initiative elections. *Political Psychology*, 30(6), 953-969

103 Guriev, S., & Papaioannou, E. (2020). The political economy of populism. Available at SSRN 3542052.

104 Persily, N., & Tucker, J. A. (Eds.). (2020). *Social Media and Democracy: The State of the Field, Prospects for Reform*. Cambridge University Press.

105 Tucker, J. A., Guess, A., Barberá, P., Vaccari, C., Siegel, A., Sanovich, S., ... & Nyhan, B. (2018). Social media, political polarization, and political disinformation: A review of the scientific literature. Political polarization, and political disinformation: a review of the scientific literature. Tech. Report

106 Zhuravskaya, E., Petrova, M., & Enikolopov, R. (2020). Political effects of the internet and social media. *Annual Review of Economics*, 12, 415-438

107 <https://www.who.int/docs/default-source/coronaviruse/situation-reports/20200220-sitrep-13-ncov-v3.pdf>

108 https://CovidinfodemicEurope.com/report/Covid_report.pdf

109 <https://www.newyorker.com/news/q-and-a/the-influence-of-the-anti-vaccine-movement>

110 Mylan, S., & Hardman, C. (2021). COVID-19, cults, and the anti-vax movement. *The Lancet*, 397(10280), 1181.,

111 https://www.politico.eu/wp-content/uploads/2019/04/ebs_488_report_en.pdf

The above narratives helped grow the distrust of people towards media (40%) and the government (20%), as discovered by a survey conducted by Ipsos Public Affairs and the Centre for International Governance Innovation (CIGI).¹¹² Interestingly, the same study also found that around 80% of people believe that disinformation has a negative effect on the politics of their country as well as of other countries.

Disinformation that is spread in Europe is either mostly adjusted content (59%) that has been intentionally changed to mislead the public or completely fabricated content (38%) as it was found by a study conducted by the Reuters Institute.¹¹³ Such content is at times shared by public figures but mostly by ordinary people. Doctors are a group of people that at times spread disinformation about Covid-19 posing a much higher risk for the society. For example, CNN published an interview of a doctor that constantly shares disinformation on Covid-19 vaccines, confronting his false information with facts.¹¹⁴

Research conducted by Avaaz¹¹⁵ concluded that Facebook has a key role in the spread of Covid-19 disinformation in Europe because they fail to decrease the amount of “fake news” Europeans are exposed to. They point out that even though there is a volume of non-English “news” fact-checked and identified as false, they are not acted upon by Facebook. That means that non-English speakers in the EU, which is the vast majority, are in greater risk to interact with Covid-19 related false information.

Additionally, in the past few years, conspiracy groups relying on social media manipulation through bots and disinformation orchestrated campaigns to spread fake scientific articles in favour of anti-vaccination and other anti-science movements, creating massive public health issues.^{116,117} To this end, YouTube announced that they would ban several anti-vaccine accounts in order to reduce misinformation about vaccines not only for Covid-19 but also for other diseases such as hepatitis B.¹¹⁸

The above facts have given the opportunity to foreigners to interfere in the internal affairs of several EU countries. For example, Russia and China used disinformation campaigns for their own interests, both promoting the

claim that they were successful in handling the crisis when EU was not, aiming to discredit the EU and reduce the trust that EU citizens have towards the Union.

More specifically, Russia has used their traditional media, such as Sputnik, as well as their sections in several EU countries, e.g. Sputnik Italy, and several online bots and trolls to spread false information regarding the origin of the virus. They also used disinformation to diminish the credibility and the response to the crisis of the EU. Russia also circulated misinformation about their vaccines in order to discredit the other vaccines not produced by Russia; they did not directly spread false information but they did selective reporting comparing the Sputnik V vaccine and the other vaccines.¹¹⁹

China tried to shift the blame of the origin of the virus from themselves using disinformation and several conspiracy theories. In addition, they tried to improve their global image and increase their reliability as a partner with the ultimate goal to increase their influence over global narratives. An example for the disinformation campaigns originated by China was a campaign targeting Italy, in which they tried to blame Italy instead of China for the origin of corona virus. At the same time, China sent some medical supplies to Italy and then used promotion to show how they were handling the situation better than the EU or the US.¹²⁰

A large part of the disinformation circulating in Europe regards vaccines. This creates a culture of fear towards vaccination; yet, anti-vax attitudes are not new. The Vaccine Confidence Project of the European Parliament discovered that western European countries with a large share of populist parties in the parliament have a greater percentage of anti-vaxxers.¹²¹ This can be explained on some level due to the fact that both anti-vaxxers and populists base their opinions on the distrust towards elites and experts.¹²² The gigantic rise of social media has added another tool to the arsenal of anti-vaxxers, allowing unprecedented spread of their messages.

A study published in *Nature*¹²³ with regard to the online anti-vax movement and disinformation in Facebook, reveals "a multi-sided landscape of unprecedented

112 <https://www.cigionline.org/sites/default/files/documents/2019%20CIGI-Ipsos%20Global%20Survey%20-%20Part%203%20Social%20Media%2C%20Fake%20News%20%26%20Algorithms.pdf>

113 <https://reutersinstitute.politics.ox.ac.uk/types-sources-and-claims-Covid-19-misinformation>

114 <https://www.youtube.com/watch?v=yw6D98v0BBg>

115 https://secure.avaaz.org/campaign/en/facebook_neglect_europe_infodemic/?slideshow

116 Bessi, A., Coletto, M., Davidescu, G. A., Scala, A., Caldarelli, G., & Quattrociochi, W. (2015). Science vs conspiracy: Collective narratives in the age of misinformation. *PLoS one*, 10(2), e0118093

117 Del Vicario, M., Bessi, A., Zollo, F., Petroni, F., Scala, A., Caldarelli, G., Stanley, H.E. & Quattrociochi, W. (2016). The spreading of misinformation online. *Proceedings of the National Academy of Sciences*, 113(3), 554-559

118 <https://www.nytimes.com/2021/09/29/technology/youtube-anti-vaxx-ban.html>

119 <https://fortune.com/2021/07/23/russian-disinformation-campaigns-are-trying-to-sow-distrust-of-Covid-vaccines-study-finds/>

120 https://www.ifj.org/fileadmin/user_upload/210512_IFJ_The_Covid_Story_Report_-_FINAL.pdf

121 [https://www.thelancet.com/journals/ebiom/article/PIIS2352-3964\(16\)30398-X/fulltext](https://www.thelancet.com/journals/ebiom/article/PIIS2352-3964(16)30398-X/fulltext)

122 <https://www.politico.eu/article/how-populists-spread-vaccine-fear/>

123 Johnson, N.F., Velásquez, N., Restrepo, N.J. et al. The online competition between pro- and anti-vaccination views. *Nature* 582, 230–233 (2020). <https://doi.org/10.1038/s41586-020-2281-1>

intricacy that involves nearly 100 million individuals grouped into highly dynamic, interconnected clusters across cities, countries, continents and languages". The study warns that in a decade the anti-vax movement will dominate the Internet, overwhelming pro-vaccination voices. Atlantic¹²⁴ and NYT¹²⁵ in two relevant articles, point out that Covid-19 is the moment this movement has been waiting for to spread their narratives. These may be similar to propaganda made on smallpox immunizations more than a century ago ("ingredients are toxic and unnatural; vaccines are not sufficiently tested; scientists who produce them are quacks and profiteers; cell cultures involved in shots are an affront to the religious; the authorities working to protect public health are guilty of tyrannical overreach" according to the Atlantic article) but spread with an unprecedented "speed, scale, and reach" that is only now possible thanks to online media.

Immigration

Immigration is a salient issue in public opinion, in political debate and in the media, mainly due to the recent influx of migrants into EU countries. In line with the raising salience of the immigration issue, there is a rise of nativist populism, anti-immigrant sentiment and xenophobic attitudes, in most European countries, matched by a dramatic fall in levels of trust in European Institutions and an increase in voter support for right-wing, anti-immigrant parties.^{126,127,128} Related empirical research suggests that individuals are often poorly informed about immigration and its consequences.^{129,130,131,132,133}

The above characteristics facilitate the spread of disinformation. Disinformation campaigns targeting at issues related to immigration and minorities have contributed significantly to the increase in anti-immigrant sentiments and movements.¹³⁴

An overlap has been observed among disinformation

activities targeting immigrants, Muslims or other minority groups. However, immigrants and minority groups are not all equally likely to become the targets of hate speech and disinformation.¹³⁵ According to the European Union Agency for Fundamental Rights (FRA), groups more vulnerable to victimisation and discrimination are immigrants and descendants of immigrants from Turkey, North Africa, Sub-Saharan Africa, Asia, as well as the Roma, Russian minorities and recent immigrants, and in general, Muslim immigrants and Jewish minorities.¹³⁶

Political actors and parties have often weaponised disinformation on immigration and minorities during electoral campaigns. Sometimes anti-immigrant disinformation has also been linked to foreign powers (i.e. Chinese, alt-right American, and Russian).¹³⁷ Other studies link disinformation to extremism or terrorism (e.g. ISIS).^{138,139} In such cases, Muslim minorities are not treated as a threat; but mainly as a recruitment pool.

In most EU countries, the disinformation network builds on right-wing sentiments and narratives and racist stereotypes. In most disinformation narratives, immigrants or minorities are presented as a threat to European culture and identity, an economic threat, a criminal threat or a health threat.¹⁴⁰

Cultural threat: This is in line with the "Islamisation" narrative, following which Muslims will soon outnumber the Europeans. In this case immigrants do not respect the western or European tradition and customs, and they are presented as a threat to European or national identity and culture. There are stories about schools in Italy, Spain or Germany that allegedly abandoned Christmas traditions or religious symbols to appease local Muslim immigrants. Moreover, in France, misleading information is spread according to which, each Muslim family has more than eight children, while non-Muslim families have an average of approximately two children.^{141,142}

124 <https://www.theatlantic.com/ideas/archive/2020/12/campaign-against-vaccines-already-under-way/617443/>

125 <https://www.nytimes.com/2021/08/31/opinion/anti-vaccine-movement.html>

126 Dustmann, C., Vasiljeva, K., and Piil Damm, A. (2019). Refugee migration and electoral outcomes. *The Review of Economic Studies*, 86(5):2035–2091.

127 Halla, M., Wagner, A. F., and Zweimüller, J. (2017). Immigration and voting for the far right. *Journal of the European Economic Association*, 15(6):1341–1385.

128 Barone, G., D'Ignazio, A., de Blasio, G., and Naticchioni, P. (2016). Mr. rossi, mr. hu and politics. The role of immigration in shaping natives' voting behavior. *Journal of Public Economics*, 136:1–13

129 <https://www.ipsos.com/ipsos-mori/en-uk/perceptions-are-not-reality-things-world-gets-wrong>

130 Alesina, A., Miano, A., and Stantcheva, S. (2018). Immigration and redistribution. Technical report, National Bureau of Economic Research

131 Benesch, C., Loretz, S., Stadelmann, D., and Thomas, T. (2019). Media coverage and immigration worries: Econometric evidence. *Journal of Economic Behavior & Organization*, 160:52–67.

132 Allcott, H. and Gentzkow, M. (2017). Social media and fake news in the 2016 election. *Journal of Economic Perspectives*, 31(2):211–36.

133 Pennycook, G., & Rand, D. G. (2020). Who falls for fake news? The roles of bullshit receptivity, overclaiming, familiarity, and analytic thinking. *Journal of personality*, 88(2), 185–200.

134 Ekman, M. (2019). Anti-Immigrant Sentiments and Mobilization on the Internet, *SAGE Handbook of Media and Migration*. London: SAGE, 2019, pp. 551–562

135 [https://www.europarl.europa.eu/RegData/etudes/IDAN/2021/653641/EXPO_IDA\(2021\)653641_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2021/653641/EXPO_IDA(2021)653641_EN.pdf)

136 European Union Agency for Fundamental Rights (FRA), Second European Union Minorities and Discrimination Survey Technical Report, 2017

137 https://wms.flexious.be/editor/plugins/imagemanager/content/2140/PDF/2020/Disinformation_on_Migration.pdf

138 <https://icsr.info/wp-content/uploads/2017/02/ICSR-Report-Media-Jihad-The-Islamic-State%E2%80%99s-Doctrine-for-Information-Warfare.pdf>

139 <https://www.independent.co.uk/news/world/middle-east/isis-islamic-state-propaganda-telegram-offical-fake-cyberattacks-accounts-a8442936.html>

140 <https://observers.france24.com/en/20180105-fake-images-racist-stereotypes-migrants>

141 <https://euvsdisinfo.eu/report/italian-town-forbids-christmas-carols-not-to-insult-migrants>

142 <https://euvsdisinfo.eu/report/muslim-fertility-rate-in-france-is-much-higher-than-non-muslim>



Figure 6 - Several images that were misappropriated and used to manipulate the public opinion on the migration crisis¹⁴³

Economic threat: Political actors and the media regularly connect immigration with economic effects, in terms of welfare state, often using negative framing to portray immigration as a drain on the budget and public services. For instance, using this negative framing, some German outlets, interpreting the numbers as it fits their narrative, have reported that on average each foreigner represents a net cost of EUR 1,800.¹⁴⁴ Related misleading statements regarding the economic and financial effects of immigration were also spread by Marine Le Pen, the President of the National Rally, in France.¹⁴⁵

Criminal threat: In this narrative, immigrants are presented as criminals, and more frequently as rapists. For instance, in Germany recurring false stories were spread on sexual assaults: immigrants raped more than 100 German women at the main square of Cologne, on 2017 New Year's Eve.¹⁴⁶ A montage of 16 pictures of women who were supposedly raped and assaulted by migrants in Europe was widely shared in six different countries (Germany, Greece, Italy, the Netherlands, the United Kingdom and France), connecting immigrants with

crime.¹⁴⁷ According to the Austrian fact-checking website Mimikama, the women in the photos were victims of domestic violence, police violence or random attacks¹⁴⁸. Although the association between crime and immigration has been shown to be misleading and a myth by a large body of research,¹⁴⁹ it still remains one of the most popular topics of the anti-immigrant sentiment. At this point, it is worth mentioning the disinformation campaign #stopislam on social media platforms,^{150,151} which is used with content in different languages mainly associated with Muslim men committing violent crimes.

Health threat: Recently, disinformation regarding immigration is in line with the health care system and the public health, as it happened in Italy where immigrants were associated with the spread of Covid-19 and the increased number of cases.¹⁵² Also in France, a video of a man assaulting nurses in Novgorod, Russia, was disseminated by French far-right Facebook pages as if it was a migrant assaulting hospital staff¹⁵³; the same video in Spain, presented the man as if he was a Muslim doing it in a Spanish health centre.¹⁵⁴ This is of course a global

143 <https://observers.france24.com/en/20180105-fake-images-racist-stereotypes-migrants>

144 Avdagic, S., & Savage, L. (2021). Negativity Bias: The Impact of Framing of Immigration on Welfare State Support in Germany, Sweden and the UK. *British Journal of Political Science*, 51(2), 624-645. doi:10.1017/S0007123419000395

145 https://www.lemonde.fr/les-decodeurs/article/2017/05/03/des-intox-du-debat-entre-emmanuel-macron-et-marine-le-pen-verifiees_5121846_4355770.html

146 <https://euvsdisinfo.eu/report/migrants-responsible-for-increase-in-robberies-murders-and-rapes-in-germany>

147 <https://observers.france24.com/en/20180105-fake-images-racist-stereotypes-migrants>

148 <https://www.mimikama.at/facebook/ueberfallene-frauen/>

149 <https://onlinelibrary.wiley.com/doi/epdf/10.1111/j.1745-9125.2012.00278.x>

150 S. Civila, L.M. Romero-Rodríguez, and A. Civila, The Demonization of Islam through Social Media: A Case Study of #Stopislam in Instagram, *Publications*, 8(4), 2020, p. 52

151 E. Poole, E. Haifa Giraud, and E. de Quincey, Tactical Interventions in Online Hate Speech: The Case of #stopislam, *New Media & Society*, March 2020

152 https://www.buzzfeed.com/albertonardelli/one-of-the-biggest-alternative-media-networks-in-italy-is?utm_term=.qlGOVlpRk#.mu5yLXRWM

153 <https://teyit.link/jswzpjH>

154 [https://www.europarl.europa.eu/RegData/etudes/IDAN/2021/653641/EXPO_IDA\(2021\)653641_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2021/653641/EXPO_IDA(2021)653641_EN.pdf)

phenomenon, also recognised by the UN that warns that such disinformation may "worsen the precarious situations in which immigrants often live",¹⁵⁵ often leading as far as deportation. The Covid-19 pandemic has also led to an increase in the levels of 'anti-gypsyism'. Political actors and leaders have targeted the Roma. There are studies confirming this tendency in many EU countries, e.g. Spain and Italy.¹⁵⁶ Finally, the European Parliament highlights that during the pandemic, extreme right-wing, populist groups and politicians used disinformation to target minority groups, relying on anti-immigration rhetoric and increasing the racist and xenophobic attitudes and discrimination.¹⁵⁷

Climate change

Climate change is an issue preoccupying the society and global community for many years and now it increasingly becomes urgent to identify its sources and effects and properly tackle it. While scientists and states try to take measures to minimize the rate in which the climate is deteriorating, there are still people and organizations that actively deny the existence of the issue, or oppose the suggested solutions.

Organisations, such as companies that belong to the fossil fuel industry,¹⁵⁸ accomplish sowing doubt and increasing the number of climate change deniers with several disinformation campaigns.¹⁵⁹ Based on research conducted by InfluenceMap in the three years following the Paris agreement, major oil and gas companies have invested over 1 Billion dollars on misleading lobbying and branding.¹⁶⁰ In the past, it was easier to deny the negative effects of human activities on the climate but lately the extreme weather conditions and the increasing number of unexpected natural disasters such as wildfires and floods¹⁶¹ are hard to deny, ignore or downplay. Yet, disinformation about climate change is as popular as ever especially due to the increase of online media, and especially social media. Interestingly, Facebook, which is among the primary channels used for disseminating information and news is taking steps to identify and minimise the "fake news" shared in the platform with the

new climate change misinformation project.¹⁶²

A study conducted by AVAAZ shows that YouTube actively presents videos with climate change disinformation to millions of users. This is even done through the search results presented to someone when looking for climate related information. An interesting fact is that well-known brands and organisations, such as Greenpeace, Samsung, L'Oreal, Warner Bros, Carrefour and Danone have advertisements run along such climate change misinformation videos. The study gathered in total 5,537 videos when searching for climate change and concluded that 16% of the 100 most viewed videos contained false information. This issue is growing in gravity both due to the higher number of misinformation videos but also due to the YouTube's recommendations algorithm. AVAAZ is providing recommendations on how YouTube can minimise the harmful information in their platform and the amount of people it reaches.¹⁶³

According to literature, the entities creating the misinforming content are not necessarily the same as those that potentially benefit from it, e.g. oil industry companies or philanthropic actors with specific interest in the environment.¹⁶⁴ Bjorn et al.¹⁶⁵ find six categories of actors that deny climate science: scientists, governments, political and religious organisations including think tanks, foundations and institutes, industry, media - specifically those with right-wing affiliation - and the public.

Several rhetorical strategies employed to spread climate disinformation have been identified in the literature. These include publishing news with false information, or with information that undermines and questions the scientific consensus, highlighting the uncertainty of science towards climate issues, attacking scientists or institutions to undermine their credibility, but also denying the existence of climate change all together, something that is adopted by several political parties.¹⁶⁶

Disinformation on climate change usually creates three types of doubt: the doubt about the reality of it, the doubt about its urgency, and the doubt about the credentials of climate scientists. This doubt is later on used for personal gain by the anti-climate change actors.¹⁶⁷

155 <https://rosanjose.iom.int/SITE/en/blog/disinformation-escalation-during-pandemic-and-how-contain-it>

156 <https://reliefweb.int/sites/reliefweb.int/files/resources/Roma%20in%20the%20Covid-19%20crisis%20-%20An%20early%20warning%20from%20six%20EU%20Member%20States.pdf>

157 https://www.europarl.europa.eu/doceo/document/TA-9-2020-0274_EN.html

158 <https://wires.onlinelibrary.wiley.com/doi/full/10.1002/wcc.665>

159 <https://www.sciencenews.org/article/climate-change-disinformation-denial-misinformation>

160 <https://influencemap.org/report/How-Big-Oil-Continues-to-Oppose-the-Paris-Agreement-38212275958aa21196dae3b76220bddc>

161 <https://www.sciencenews.org/article/climate-change-wildfires-heat-waves-hurricanes-records-2020>

162 <https://www.dw.com/en/facebook-starts-bid-to-fight-climate-misinformation/a-56713217>

163 https://secure.avaaz.org/campaign/en/youtube_climate_misinformation/

164 Treen, K. M. D. I., Williams, H. T., & O'Neill, S. J. (2020). Online misinformation about climate change. *Wiley Interdisciplinary Reviews: Climate Change*, 11(5), e665.

165 Bjornberg, K. E., Karlsson, M., Gilek, M., & Hansson, S. O. (2017). Climate and environmental science denial: A review of the scientific literature published in 1990-2015. *Journal of Cleaner Production*, 167, 229–241. <https://agris.fao.org/agris-search/search.do?recordID=US201800045283>

166 <https://www.annualreviews.org/doi/pdf/10.1146/annurev-publhealth-090419-102409>

167 <https://www.carbonbrief.org/guest-post-how-climate-change-misinformation-spreads-online>

In general, in Western countries, right-wing parties are more sceptical about the existence of the climate change phenomenon and its impact on the environment, opposing to any action suggested for tackling the issue; at the same time the political left (e.g. environmental groups, liberals or left wing politicians/media) is more sensitive to the warnings from the scientific world.¹⁶⁸ Nowadays, in most European countries the consensus among rival political parties on climate change-related issues is increasing. Political forces placed both in the left and in the right of the political spectrum agree on addressing this issue. A relevant study focusing on energy transition policies in six European countries (France, Germany, the Netherlands, Poland, Spain, and the UK) confirms that, pointing out the consensus between conservative parties and far-right parties.¹⁶⁹

Nevertheless, more often far-right parties in Europe tend to support climate change denial or sceptical opinions. As shown in a study by adelphi, there are three attitudes towards climate change from populist right-wing parties. The denialists or sceptics, the disengaged or cautious, and the affirmative. The majority of European right-wing parties are considered disengaged or cautious (11/21) but many are considered denialists (7/21).¹⁷⁰ The abstention as well as denialism of the climate change issue has an impact on Europe's climate strategy. While these parties do not solely form the strategy, policies and legislation made by the European Commission, they are dragging the centre parties towards their position which may lead to weaker results in the fight against climate change.¹⁷¹

Finally, as for the foreign sources of disinformation in Europe, according to euvsdisinfo.eu, a series of pro-Kremlin media report on how harmful green energy is, after the EU's criticism of the Russian 2021 Duma elections. The Russian disinformation targets the EU and its member states' energy policies and their goals.¹⁷² They falsely claimed that "Alternative energy is a scam" and they articulated threats of increasing natural gas prices for the EU, what eventually happened.¹⁷³ Relying

on conspiracy theory targeting Greta Thunberg, a 16-year-old climate activist,¹⁷⁴ and accusing the West of allegedly exploiting the environmental agenda and climate change topic, "to stop its competitors, especially Russia, from economic development".¹⁷⁵

POLITICAL INTERESTS AND DISINFORMATION IN FRANCE

Politics and disinformation

Evidence from the 2017 French presidential election shows that social bots drove the #MacronLeaks disinformation campaign. Most users who engaged with the #MacronLeaks disinformation campaign are "foreigners with a pre-existing interest in alt-right topics and alternative news media, rather than French users with diverse political views".⁹¹ Among threads related to the 2017 French election, which were mainly spread by 4chan.org,¹⁷⁶ the coordinating cyber-attacks aimed at revealing sensitive information about the presidential candidate Emmanuel Macron was the most popular.¹⁷⁷ For example, a mix of allegedly real and fabricated emails and documents were leaked online with indication of Russian influence, almost a day before polls opened for the French presidential election involving Emmanuel Macron and Marine Le Pen.¹⁷⁸ This gained more attention after an anonymous post shared on Twitter by alt-right activist and Trump supporter, Jack Posobiec,¹⁷⁹ and ultimately, the leaked documents were shared on Twitter by the WikiLeaks official account, which made the ongoing disinformation campaign go viral, using the #MacronCacheCash hashtag. Many attacks against Macron presented him as a "US agent" or accused him of having an extramarital gay relationship.^{180,181} Even today, the hashtag #MacronLeaks is still used by the political opposition as a general tag to attack Macron, his government, and his political party.

This misinformation spread considerably by the French outlets of Russian-sponsored RT and Sputnik, which were

168 Rossen, I. L., Dunlop, P. D., & Lawrence, C. M. (2015). The desire to maintain the social order and the right to economic freedom: Two distinct moral pathways to climate change scepticism. *Journal of Environmental Psychology*, 42, 42–47. <https://doi.org/10.1016/j.jenvp.2015.01.006>

169 Hess, D. J., & Renner, M. (2019). Conservative political parties and energy transitions in Europe: Opposition to climate mitigation policies. *Renewable and Sustainable Energy Reviews*, 104, 419-428.

170 <https://www.adelphi.de/en/system/files/mediathek/bilder/Convenient%20Truths%20-%20Mapping%20climate%20agendas%20of%20right-wing%20populist%20parties%20in%20Europe%20-%20Oadelphi.pdf>

171 <https://e360.yale.edu/features/for-europes-far-right-parties-climate-is-a-new-battleground>

172 <https://euvsdisinfo.eu/the-kremlin-on-global-warming-connecting-the-dots-disconnecting-the-facts/?highlight=climate>

173 <https://euvsdisinfo.eu/report/green-energy-is-a-scam-gazprom-is-safer>

174 <https://www.rt.com/op-ed/453730-greta-thunberg-environmental-activist-crusader-saint/>

175 <https://euvsdisinfo.eu/report/the-west-invented-the-climate-hoax-to-stop-russias-economic-development/>

176 The 4chan.org popular platform trolling tactics to draw attention has been reportedly functioning as an effective incubator of alt-right and alt-right online communities, especially in the United States

177 En Marche! (2017). Communiqué de presse - En Marche a été victime d'une action de piratage massive et coordonnée. <https://en-marche.fr/article/communiqu%C3%A9-de-presse-piratage>

178 <https://www.cnet.com/tech/services-and-software/macron-french-presidential-campaign-says-it-was-hacked/>

179 <https://www.thedailybeast.com/the-twitter-bots-who-tried-to-steal-france>

180 <https://www.marianne.net/politique/rumeur-sur-sa-double-vie-emmanuel-macron-sort-du-silence>

181 https://www.liberation.fr/france/2017/02/07/macron-gav-la-fabrique-d-une-rumeur_1546935/

responsible for most of the fake news about Macron during his campaign.¹⁸² Finally, there is evidence of connection among the accounts used to support then-presidential candidate Trump before the 2016 U.S. election and the #MacronLeaks disinformation campaign, which is in line with the hypothesis that a black market of reusable political disinformation bots exist.⁹¹

Moreover, Le Monde observed 19 misleading statements by Marine Le Pen, the extreme-right candidate of the National Front party, who reached the runoff of the 2017 French presidential election, during her debate against Emmanuel Macron on TV. Most of those were related to economic and financial issues, the EU, the welfare state and the benefits provided to immigrants/foreigners.¹⁸³

Maxime Vaudano, one of the journalists at Les decodeurs (the Le Monde fact-checking team), observed an increase in misleading information in 2017, confirming a “Trump-effect” in French politics. He argues that all candidates presented false statements during the campaign, mentioning that “there are generally more lies coming from the right and the extreme right. And a bit more from the extreme left. In general, there are a bit less lies coming from the centre and the left, because their rhetoric is different. It doesn’t mean that they are perfect, but they use fewer direct lies, they use different rhetoric.”¹⁸⁴ This tendency of the far-right party, Front National, to use more false information in their campaign

than other parties, is also observed by Julien Pain, a fact checker and editor-in-chief of France 24’s Observers.¹⁸⁴ In a more recent study Henry et al., in line with other studies, found that right-wing respondents were more likely to share false news originating from extreme-right politicians.¹⁸⁵



Figure 7 – Disinformation example from a French politician on Covid-19 and a medicine falsely claimed as a cure to the virus¹⁸⁶

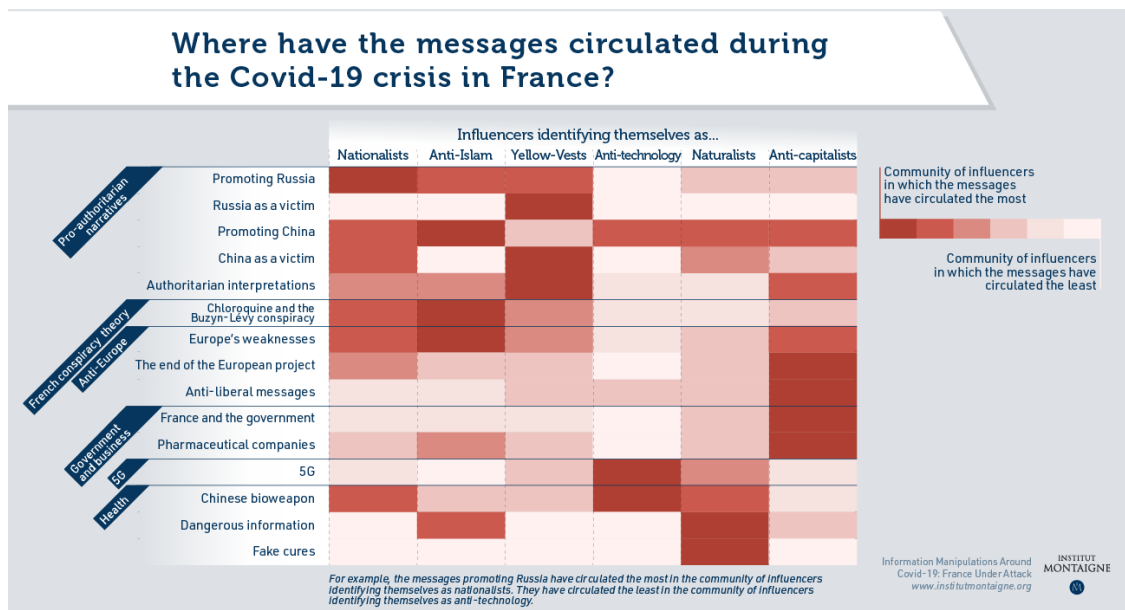


Figure 8 - Where the messages circulate during Covid-19 crisis in France (image from Information Manipulations around Covid-19¹⁸⁷)

182 https://www.atlanticcouncil.org/wp-content/uploads/2019/06/The_Macron_Leaks_Operation-A_Post-Mortem.pdf

183 https://www.lemonde.fr/les-decodeurs/article/2017/05/03/des-intox-du-debat-entre-emmanuel-macron-et-marine-le-pen-verifiees_5121846_4355770.html

184 Skjeseth, H. T. (2017). All the president’s lies: Media coverage of lies in the US and France. Reuters Institute Fellowship Paper, University of Oxford.

185 Henry E, Zhuravskaya E, Guriev S. 2020. Checking and sharing alt-facts. CEPR Work. Pap. 14738, Cent. Econ. Policy Res., London

186 <https://medium.com/dfrlab/misinformation-regarding-frances-covid-19-health-passes-spread-on-twitter-ba344920bc16>

187 <https://www.institutmontaigne.org/node/7475>

Covid-19 disinformation

In France, the most common topics of Covid-19-related disinformation revolve around medicine¹⁸⁸ as well as alternative remedies¹⁸⁹ or even breathing tests.¹⁹⁰ These types of disinformation appeared to be used towards serving several interests.

The Institute for Strategic Dialogue (ISD) and the Institute Montaigne have identified in their study what messages were circulating by different types of influencers during the Covid-19 crisis in France in the beginning of the Covid-19 pandemic (prior to vaccines). As shown in **Figure 8**, far-right supporters like nationalists and anti-Islam influencers have similar interests that include pro-authoritarian narratives, conspiracy theories as well as anti-Europe topics. On the other hand, far-left supporters (anti-capitalists) do not really occupy themselves with pro-authoritarian narratives but are only interested in topics regarding Europe's weaknesses as well as theories regarding the government and business. Adding to these findings, in the same figure we can see that those influencers that are identifying as anti-technology and pro-naturalism mostly circulated messages and theories regarding technology like 5G, and health related issues.

From this figure, we can understand how the circulation of information and disinformation has a political dimension and how they circulate in communities with the common interests.¹⁹¹

What is interesting is that, in contrast to other European countries, France seems to be relatively immune to conspiracy theories originating abroad. The same study supports that this is the case due to language limitations. For example, they found that pro-Russian messages were more than the pro-China ones since they assume China campaigns used English language alone.

An interesting case is about a Covid-19 disinformation video called 'Hold-up' that was uploaded on YouTube on November 2020 and remained on the platform for at least six months. This video included statements about how Covid is part of the plan of the global elite to eliminate the world population, theories about the origin of the virus, the danger of masks and hydroxychloroquine and more. The original video as well as several copies were accessible through not only YouTube but also Google and

Facebook. A fact that can serve as an example of how the online platforms have not managed to get the disinformation of Covid-19 under control in a timely manner, especially considering that this video alone reached almost 3 million views in only five days.¹⁹² The same fact is supported also by a report published by Avaaz that shows that disinformation regarding Covid is more likely to get removed from Facebook, if they are targeting the US rather than Europe.¹⁹³

The disinformation in France exploded when vaccinations started. A well-known case of disinformation that was used to serve political interests regards the "health passes" announcement during the summer of 2021.¹⁹⁴ Even though this decision was made by Macron with the aim of encouraging the vaccination of the French population and reducing the spread of the virus, it was exploited by the far-right parties (i.e. FN and the Patriots) to achieve the exact opposite. Several accounts belonging to media organisations, and political candidates as well as inauthentic accounts leveraged on the "health pass" announcement to amplify anti-vaccination messages. This resulted in increased fear and misinformation regarding vaccines and the "health passes", with the ultimate goal to make political gains and magnify fears that President Macron was acting like a dictator.

Additionally, several French social media influencers were contacted by some sort of advertising agencies in order to hire them to promote fake stories about Pfizer's vaccine.¹⁹⁵ A French YouTuber named Le Grasset that has over one million subscribers was one of the influencers contacted by an agency called Fazze, and he was requested to say that the Pfizer vaccine caused almost three times more deaths than the AstraZeneca vaccine. After investigation, the authorities found that the PR firm contacting him had ties to Russia.^{196,197}

Immigration disinformation

Anti-refugee and/or anti-immigrant disinformation is widely spread in France. Thousands of people enter the country as immigrants each year, with the number rising since 2005 and reaching 270K people in 2019.¹⁹⁸ Issues related to national identity, integration and immigration are salient to the political debate and public discourse in France and mainly instigated by far-right political actors.

188 <https://factuel.afp.com/non-la-chloroquine-na-pas-ete-interdite-par-un-arrete-en-janvier-2020>

189 <https://factuel.afp.com/non-des-gargarismes-deau-tiede-melangee-du-sel-ou-du-vinaigre-ne-soigne-pas-le-coronavirus>

190 <https://factuel.afp.com/retenir-son-souffle-ne-permet-pas-de-detecter-si-une-personne-est-atteinte-du-Covid-19-selon-loms>

191 <https://www.isdglobal.org/wp-content/uploads/2020/07/Institut-Montaigne.pdf>

192 <https://www.politico.eu/article/french-viral-Covid-19-conspiracy-documentary-stayed-months-on-youtube-facebook/>

193 <https://www.politico.eu/article/facebook-Covid19-misinformation-europe-united-states/>

194 <https://medium.com/dfriab/misinformation-regarding-frances-Covid-19-health-passes-spread-on-twitter-ba344920bc16>

195 <https://globalnews.ca/news/7894613/Covid-19-coronavirus-misinformation-influencer-france-sponsor-fake-news/>

196 <https://www.pharmaceutical-technology.com/features/Covid-19-vaccine-disinformation-social-media/>

197 <https://www.bbc.com/news/blogs-trending-57928647>

198 <https://www.statista.com/statistics/752602/number-of-immigrant-arrivals-france/>

A journalistic investigation carried out by Le Monde discovered a network of misleading Facebook pages and links connected to a French white supremacist network and white nationalist groups. The contents are published behind misleading names, using the appeal of trusted institutions such as firefighters or the police.¹⁹⁹

There is also evidence that many of the political rumours and hoaxes during the French presidential election campaign of 2017 came from a small number of actors and sites, in association with the so-called “fachosphere”, i.e. people who are not necessarily supporters of the far-right Front National (FN), but who share the party’s views on immigration and Islam.²⁰⁰ For instance, there was misleading information regarding Alain Juppe, member of The Republicans and ex-Prime Minister of France from 1995 to 1997, suggesting that he was close to radical Islam and even misspelling his name as Ali Juppe.¹⁸⁴

Some of the “attacks” against Macron were highly related to “Islam” narrative, blaming him for the uncontrolled immigration and calling him supporter of Islamic extremism. For instance, there was a fabricated article claiming that Macron’s candidacy was financially supported by Saudi Arabia.²⁰¹ This article appeared as if it came from the Belgian newspaper Le Soir and it was circulated by Marion Maréchal-Le Pen, niece of Marine Le Pen and MP, tweeting: “30% of the Macron campaign financed by Saudi Arabia? We demand transparency!” Although she deleted it afterwards, her tweet was retweeted more than two hundred times in half an hour, and among the retweeters were the presidential candidates Le Pen and Fillon.²⁰²

Another common narrative is about the secret plans of Macron to promote the islamisation of France and Europe,²⁰³ by teaching French children that Islam was always part of France.²⁰⁴ To preserve the national identity against the islamisation of France, disinformation is used highlighting the overpopulation of Muslims in France due to the extreme number of children in Muslim-families, presenting misleading numbers.²⁰⁵ Although French law

forbids religious symbols in schools and public institutes, a false story was presented according to which ‘France is banning Christmas symbols’ or crosses are removed in French schools in order to “avoid hurting the feelings of Muslim students.”²⁰⁶ A similar fabricated story presented the Pope stating that a mosque should be built at the site of Notre Dame de Paris.²⁰⁷

Roma populations have also been targeted with false information many times, sometimes leading to violent actions towards them. For example, in 2019 there was a rumour spread through messaging apps and social media that Roma were responsible for kidnappings. This rumour led to an attack against the Roma, after which 20 people were arrested.²⁰⁸ Although, it is unclear who was behind these rumours, the European Roma Rights Centre (ERRC) claims that it seemed as a coordinated campaign.²⁰⁹ Even after the elections, anti-immigrant disinformation kept spreading and some of the attacks were political. For instance, Sonia Krimi, a Tunisian-born, French MP of La République en Marche! (LREM), was falsely accused of having pledged for the integration of the Muslim Brotherhood in France. A TV appearance of Ms Krimi, triggered far-right outlets to share the false story, reaching a peak in February 2019.²¹⁰

On another incident, anti-immigrant groups and politicians close to the far-right claimed that refugees were given a cash card loaded with several hundred euros each month.²¹¹ Members of the National Front shared this lie; specifically, Bernard Monot, MEP of the National Front, wrote on his Facebook page: “Here is an example of a debit card sent by the Ministry of the Interior to “asylum-seekers”. The card allows them to make withdrawals of, depending on the individual case, up to 40 euros a day!” Le Pen tried systematically to convince voters that immigrants and refugees, come to France for economic reasons, instead of seeking security, in order to benefit from the generous French welfare system. To do so, she often provided factually incorrect numbers.^{212,213}

199 https://www.lemonde.fr/les-decodeurs/article/2019/09/11/la-galaxie-suavelos-vitrine-d-un-racisme-decomplexe_5509154_4355770.html

200 http://www.lemonde.fr/les-decodeurs/article/2017/05/05/une-campagneplombée-par-les-rumeurs-et-les-fausses-informations_5122623_4355770.html

201 https://www.lemonde.fr/les-decodeurs/article/2017/03/02/macron-finance-par-l-arabie-saoudite-une-intox-massivement-relayée-par-l-extreme-droite_5088356_4355770.html

202 “Was Macron’s campaign for the French presidency financed by Saudi Arabia?”, Crosscheck, March 2, 2017

203 <https://diversitymactfrei.blogspot.com/2017/05/macron-leaks-contain-secret-plans-for.html>

204 The_Donald, “FRENCH MEDIA IS SHUT DOWN. WE’RE NOT. HERE ARE 5 THINGS MACRON DOES NOT WANT THE FRENCH PEOPLE TO KNOW.” Reddit, May 6, 2017, https://i.reddit.com/r/The_Donald/comments/69nn5i/french_media_is_shut_down_were_not_here_are_5/?limit=500

205 <https://euvsdisinfo.eu/report/muslim-fertility-rate-in-france-is-much-higher-than-non-muslim>

206 <https://euvsdisinfo.eu/report/germany-removes-baby-jesus-from-christmas-markets>

207 <https://euvsdisinfo.eu/report/the-pope-might-suggest-a-mosque-to-be-built-at-the-site-of-notre-dame>

208 <https://www.theguardian.com/world/2019/mar/27/roma-call-for-protection-after-vigilante-attacks-inspired-by-fake-news>

209 [https://www.europarl.europa.eu/RegData/etudes/IDAN/2021/653641/EXPO_IDA\(2021\)653641_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2021/653641/EXPO_IDA(2021)653641_EN.pdf)

210 Adrien Sénécat, Sonia Krimi et les Frères musulmans, histoire d’une citation dévoyée, Le Monde, 7 February 2019.

211 <https://observers.france24.com/en/20180105-fake-images-racist-stereotypes-migrants>

212 https://www.lemonde.fr/les-decodeurs/article/2017/05/03/des-intox-du-debat-entre-emmanuel-macron-et-marine-le-pen-verifiees_5121846_4355770.html

213 Barrera, O., Guriev, S., Henry, E., & Zhuravskaya, E. (2018). Facts, alternative facts, and fact checking in times of post-truth politics. Retrieved from https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3004631

Climate change disinformation

Global warming is one of the topics that generates a lot of misinformation in social media.²¹⁴ According to notre-planete.info,²¹⁵ some of the most popular fake news in France regarding climate change are the following: a new ice-age period,²¹⁶ an increase in cannibalism of polar bears,²¹⁷ and electric car emissions. Particularly, there is an increase in fake news regarding the “pollution” of electric cars, since the yellow vests protested for the reduction of taxes on fuel and in particular on diesel. Moreover, several articles appeared to condemn electric scooters, in the same vein as those denouncing electric cars, sometimes even arguing that diesel is preferable.²¹⁸ Recently, it was announced that Wikimedia France, parent company of Wikipedia, will help Internet users to identify misleading content, mostly shared by climate sceptics. Associated with the Digital New Deal foundation and the Francophone Union, the so-called #stopauxinfox will be based on artificial intelligence that identify in real time emerging hoaxes and false information on global warming shared on social networks.²¹⁹



Figure 9 - Example of false news in French media²¹⁷

Furthermore, disinformation on climate change in France is related to wind power and wind turbines, mainly due to the public debate about this issue during the regional elections. Anti-eolian lobbies spread rumours about the

noise generated by wind turbines or the non-profitability of wind energy.^{220,221} Misleading information and fake news about wind energy were relayed during the regional election campaign, which made many headlines in the French media.²²² Much of the misleading information was released by Stéphane Bern, a French journalist²²³ who argues that wind energy is not ecological or renewable, it seriously pollutes the environment, and destroys the natural and built heritage of the country. To the best of our knowledge, there are so far no studies to directly connect the disinformation campaign on climate change with political actors or interests. Yet, wind turbines were mostly criticized by the National Rally, right-wing candidates and the Communist Party. Criticisms were at times factual, but often outrageous and caricatured.²²⁴ Most of the following statements do not rely on scientific studies or contain some misleading information.²²⁵

Specifically, Marine Le Pen, in March 9, 2021 claimed that "Thanks to nuclear power, we already have a carbon-free economy for the most part. Why destroy our landscapes and cause multiple nuisances by sowing fields of wind turbines everywhere? disastrous, intermittent and dependent energy."²²⁶ She also argued that "If we follow the government's plans, tomorrow, millions of French people will be in fuel poverty. This will have a cost." referring to wind turbines.²²⁷ In addition, Hervé Juvin, RN candidate in Pays-de-la-Loire, on May 30 wrote on Twitter: "Animals are dying, more than 400 animals have died in ten years."²²⁸ Xavier Bertrand, a French right-wing politician and president of the regional council of Hauts-de-France vaguely claimed that "It costs a lot of money and considering that we are going to have electric vehicles, we are going to develop all of that, with less nuclear power and wind turbines that do not run all the time".²²⁹ In general, this stance is somehow associated with the far-right positions towards ecology. In the French far-right, the denial of the existence of climate change is no longer a predominant issue; a better term to use is "climate scepticism".^{230,231} The party's environmental

214 <https://www.linfordurable.fr/environnement/desintox-cinq-arguments-des-climato-sceptiques-passes-au-crible-9483>

215 <https://www.notre-planete.info/actualites/fake-news.php>

216 https://www.notre-planete.info/actualites/3284-prochaine_ere_glaciaire

217 <https://www.notre-planete.info/actualites/4643-ours-polaire-changement-climatique-cannibalisme>

218 <https://www.notre-planete.info/actualites/3072-trottinette-electrique-impact-environnement-CO2>

219 <https://www.leparisien.fr/environnement/un-dispositif-pour-lutter-contre-les-fake-news-sur-le-climat-11-09-2019-8149683.php>

220 <https://www.ouest-france.fr/environnement/climat/vrai-faux-la-verite-sur-les-cliches-qui-collent-aux-eoliennes-6728319>

221 <https://fee.asso.fr/actu/les-fakes-news-de-leolien-a-lheure-de-la-realite-le-fact-checking-des-medias/>

222 https://www.lepoint.fr/economie/eoliennes-stephane-bern-relaie-des-fake-news-sans-aucun-scrupule-04-06-2021-2429630_28.php

223 https://www.francetvinfo.fr/economie/energie/temps-de-fonctionnement-et-recyclage-des-eoliennes-qui-dit-vrai-entre-barbara-pompili-et-stephane-bern_4649343.html

224 https://www.francetvinfo.fr/meteo/climat/vrai-ou-fake-regionales-les-attaques-de-certains-candidats-contre-les-eoliennes-sont-elles-fondees_4646077.html

225 <https://www.ouest-france.fr/environnement/climat/vrai-faux-la-verite-sur-les-cliches-qui-collent-aux-eoliennes-6728319>

226 <https://www.youtube.com/watch?v=v4z-ZUOVjLU&t=730s>

227 <https://premium.courrier-picard.fr/id192939/article/2021-05-15/elections-regionales-insecurite-eoliennes-marine-le-pen-au-soutien-dans-laisne>

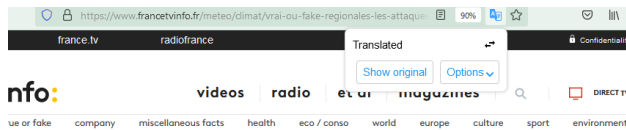
228 <https://twitter.com/HerveJuvin/status/1398945781978128388>

229 <https://www.facebook.com/watch/?v=435136417564013>

230 Van Rensburg, W., 2015. "Climate change scepticism: A conceptual re-evaluation." SAGE Open, 51 5(2), 1-13.

231 Boukala, S., & Tountasaki, E. (2019). From Black to Green: Analysing Le Front National's 'Patriotic Ecology'. In *The Far Right and the Environment* (pp. 72-87). Routledge.

discourses revolve around the public health and security and the French territory, heritage and national identity adding an anti-immigration perspective to ecology, which is perceived as a symbol of a wider left globalist ideology that threatens European identity at large.^{232,233,234}



...true or fake

Regional: are the attacks of certain candidates against wind turbines justified?

Criticized by the National Rally, right-wing candidates or the Communist Party, the wind turbines are agitating the regional campaign. Critics are sometimes factual, but often outrageous and caricatured.

Figure 10 - Example of how right wing candidates used some disinformation about wind turbines²³⁵

POLITICAL INTERESTS AND DISINFORMATION IN GERMANY

Media independence and disinformation

As seen in Chapter 2, media in Germany have adequate regulations and supervision where necessary. That is probably the reason why Germany marks 13th in the 2021 world press freedom index, which is calculated by the Reporters without Borders.²³⁶ Additionally, as found by the MPM study,²³⁷ they achieve a low risk (8%) in the political independence indicator. In all five sub-indicators that comprise the political independence indicator, Germany appears to have a low risk due to the fact that they have a set of regulations, safeguards and rules that allow smooth and independent operation of the press. For example, there are legal safeguards against formal control of media by political parties as well as other types of rules regarding political advertising.

In such high-trust countries, partisan disinformation is not widely spread; online disinformation mainly reflects the

controversial debate over the refugee crisis or other salient issues.²³⁸ But even in this case, disinformation remains a serious problem among specific groups of citizens or political parties. In a study that analysed disinformation in the 2017 German parliamentary elections,²³⁹ it was shown that the less trust people had in both traditional media and the political system, the higher the perceived believability of disinformation news during the election campaign. According to a panel survey, disinformation during the 2017 German parliamentary elections had an impact on vote choice by decreasing the likelihood of the electorate to vote for the main governing party (i.e., the CDU/CSU), and driving them into the arms of right-wing populists, i.e. the Alternative für Deutschland party (AfD – right wing party). Specifically, the AfD itself announced in October 2016 that “of course” they would use social bots in their election campaign, since they considered such tools important.²⁴⁰ Neudert et al. found that most bots were supporting AfD.²⁴¹ Another study found that AfD had the largest share of active followers, and although it had the smallest share of bot followers, it had the second highest share of active social bots.²⁴² These indications of bots’ activity on Twitter during the pre-electoral period show that disinformation can serve political interests and can influence the voting decision of the public.

Covid-19 disinformation

In the case of Germany, the topics of Covid-19 disinformation include among others: rumours about the effectiveness of medicines such as hydroxychloroquine /chlorine dioxide,²⁴³ gargling water as a remedy, breathing tests to understand if one has been infected,²⁴⁴ nicotine as a way to decrease chances of getting Covid,²⁴⁵ etc. are just some of those. These conspiracy theories as well as the number of people believing in them increased while the measures against Covid-19 were becoming increasingly strict. The origin of these theories can be located among right-wing parties as well as promoters of

232 <https://www.lesechos.fr/elections/europeennes/jordan-bardella-le-%20meilleur-allie-de-lecologie-cest-la-frontiere-1007315>

233 <https://www.lefigaro.fr/politique/bardella-c-est-par-le-retour-aux-frontieres-que-nous-sauverons-la-planete-20190414>

234 https://www.lepoint.fr/politique/marine-le-pen-compare-les-migrants-a-des-eoliennes-14-04-2019-2307577_20.php

235 https://www.francetvinfo.fr/meteo/climat/vrai-ou-fake-regionales-les-attaques-de-certains-candidats-contre-les-eoliennes-sont-elles-fondees_4646077.html

236 https://rsf.org/en/ranking_table

237 <https://cadmus.eui.eu/handle/1814/71947>

238 Edda Humprecht (2019) Where ‘fake news’ flourishes: a comparison across four Western democracies, *Information, Communication & Society*, 22:13, 1973-1988, DOI: 10.1080/1369118X.2018.1474241

239 Zimmermann, F., & Kohring, M. (2020). Mistrust, disinforming news, and vote choice: A panel survey on the origins and consequences of believing disinformation in the 2017 German parliamentary election. *Political Communication*, 37(2), 215-237.

240 Stürzenhöfcker, M. (2016, October 21). AfD will Social Bots im Wahlkampf einsetzen. *Zeit Online*. Retrieved from <http://www.zeit.de/digital/internet/2016-10/bundestagswahlkampf-2017-afd-social-bots>

241 Neudert, L.-M., Kollanyi, B., & Howard, P. N. (2017). Junk news and bots during the german parliamentary election: What are German voters sharing over Twitter?

Retrieved from http://comprop.ox.ac.uk/wp-content/uploads/sites/89/2017/09/ComProp_GermanElections_Sep2017v5.pdf

242 Tobias R. Keller & Ulrike Klinger (2019) Social Bots in Election Campaigns: Theoretical, Empirical, and Methodological Implications, *Political Communication*, 36:1, 171-189, DOI: 10.1080/10584609.2018.1526238

243 <https://correctiv.org/faktencheck/medizin-und-gesundheit/2020/02/07/die-einnahme-von-chlordioxid-hilft-nicht-gegen-das-neue-coronavirus/>

244 <https://correctiv.org/faktencheck/2020/03/16/falsche-tipps-in-whatsapp-kettenbrief-luft-anhalten-oder-wasser-trinken-helfen-nicht-gegen-coronavirus/>

245 <https://correctiv.org/faktencheck/2020/05/05/es-gibt-keine-belege-dafuer-dass-nikotin-gegen-das-coronavirus-hilft/>

anti-Semitic ideology. The rise of these theories and the belief that the measures taken by the government tend to undermine everyone's freedom led to the organisation of several anti-corona protests, fuelled by widespread disinformation. The main organisers of these protests were not necessarily from far- and extreme-right but right-wing party supporters participated in them given that they aligned well with their agenda.



Figure 11 - Examples of disinformation in Germany regarding Covid-19. Left: Article about breathing tests to verify whether someone is infected by the virus²⁴⁶, Right: False information about vaccination risks²⁴⁷

Initially the protests against the measures taken to address the pandemic included people with different political points of view. Nevertheless, lately, as identified by a ZDF poll, most (54%) of the people that still believe the demonstrations are beneficial are AfD voters; at the same time only 3% of Green party voters, 5% of centre-right Christian democrat voters and 7% of centre-left social democrat voters believe the same.

The AfD exploited the Covid-19 measures taken by the government to promote the view that they are leading towards some sort of dictatorship and infringement of citizen rights, something that fits nicely in their long-time narrative of government overreach. According to a recent Slate article,²⁴⁸ the AfD may not be leading the protests but many representatives, especially in eastern Germany, have embraced both the protests and the rhetoric about the German government being a “corona dictatorship”. Maik Fielitz, a researcher at the Institute for Democracy and Civil Society in Jena, is reported saying in the same article that corona-virus has in some ways replaced immigrants in the rhetoric of the German far-right as a way to steer anti-government sentiment. The driving force behind the demonstrations as well as the violent events that occurred outside of the Reichstag building was a relatively new group called Querdenken (“lateral thinkers”).²⁴⁹ Their purpose initially concerned issues like

individual freedom and they claimed to be unattached to political beliefs but that is not exactly the case. Nachtway et al.²⁵⁰ showed that members of Querdenken in the previous elections (2017) were supported from the Greens and CDU/CSU to far right parties; however, after the pandemic AfD supporters nearly doubled in the circle of Querdenken whereas other parties did not get any support. Based on research by openDemocracy²⁴⁹, the main means for delivering false information especially in the circle of Querdenken was Telegram, a messaging app that allows a group to have up to 200,000 members on contrary of other common applications. Several of the extreme theories as well as the conspiracy theories and anti-vax theories were communicated through Telegram and the followers of the public chats increased over time. Other sources of disinformation that were communicated also through Telegram included Russian and Chinese media outlets. Several articles that contained false information were shared by millions of people such as stories that question the scientific proof of the danger of Covid-19 as well as the efficacy of masks and vaccines.²⁴⁹ The research of OpenDemocracy found that Russian media outlets ranked high as the most shared media on Telegram. Specifically, the media network RT-DE, the German branch of the Russian state-controlled media network, became the 6th most shared media in Telegram. An example of disinformation is the video produced by RT DE titled “Dr Claus Köhnelein on “fatal coronavirus experiments” by the WHO” that was shared more than 200,000 times in Telegram and received 1.5 million views on YouTube.²⁵¹ Additionally, Russian campaigns tried to promote conspiracies against the US, such as that the virus was a US-made weapon. Since the vaccines were developed, the main narrative of the disinformation from Russia revolves around the Sputnik V vaccine and the reasons behind its rejection from Europe.²⁵² This was identified by YouTube leading to the eventual deletion of the Russian state-backed channels RT, on grounds of breaching their Covid misinformation policy.²⁵³

Immigration disinformation

Immigration-related disinformation in Germany primarily focused on attacking and vilifying immigrants, especially Muslims, given the salience of the refugee situation in the national news agenda for a long time.²⁵⁴ Germany has

²⁴⁶ <https://www.wochenblick.at/horror-risiken-nach-corona-impfung-bekaempft-koerper-eigene-zellen/>

²⁴⁷ <https://correctiv.org/faktencheck/2020/03/16/falsche-tipps-in-whatsapp-kettenbrief-luft-anhalten-oder-wasser-trinken-helfen-nicht-gegen-coronavirus/>

²⁴⁸ <https://slate.com/news-and-politics/2021/02/germany-Covid-conspiracies-misinformation-querdenker-reichsbuerger-far-right.html>

²⁴⁹ <https://www.opendemocracy.net/en/germany-ground-zero-Covid-infodemic-russia-far-right/>

²⁵⁰ <https://osf.io/preprints/socarxiv/zvp3f/>

²⁵¹ <https://www.opendemocracy.net/en/germanys-Covid-sceptics-fuelled-by-russian-media-and-far-right-conspiracies/>

²⁵² https://www.europarl.europa.eu/thinktank/en/document.html?reference=EXPO_STU%282021%29653633

²⁵³ <https://www.theguardian.com/technology/2021/sep/29/youtube-deletes-rts-german-channels-over-Covid-misinformation>

²⁵⁴ Humprecht, E. (2019). Where ‘fake news’ flourishes: A comparison across four Western democracies. *Information, Communication & Society*, 22, 1973–1988. doi:10.1080/1369118X.2018.1474241

suffered an increase of disinformation regarding the troubles caused by immigration from Islamic countries, since 2015 when Chancellor Angela Merkel decided to adopt a friendly strategy towards refugees by allowing them to enter the country.²⁵⁵ Given that CDU/CSU and Chancellor Angela Merkel were deemed responsible for Germany's "welcome policy" concerning Muslim immigrants, they are the ones that considerably suffered from immigrant-related disinformation in Germany.²⁵⁶

Producers of such online disinformation in Germany are mainly right-wing activists who accuse politicians and mainstream media of downplaying the consequences of rising immigration, without taking a distinct partisan perspective.²⁵⁴ During those years, several reports that contained false information were circulated by mostly right-wing supporters, such as supporters of the AfD, which is known to support anti-immigration views. The crowd reading and believing these types of information increased while more violent incidents, such as sexual assaults, were being reported in connection with the migrants. However, the right wing is not the only political space connected to such disinformation. For example, a politician from the left-wing party, The Greens, supposedly made some controversial remarks about a murder committed by a refugee. It was later proved that it was indeed not true and the "report" was made by an anti-Islam movement.²⁵⁷

From this spread of fake news, the one who benefitted most was the far-right party of Germany, AfD. They saw an increase of their supporters elected for the first time in the Parliament, and ended up being Bundestag's bigger opposition party in the elections of 2017. The xenophobic content of disinformation, and the negative framing with regard to immigrants (e.g., as criminal foreigners) prompts negative attitudes toward immigration and its consequences, raising the salience of the refugee situation and immigration as a problem, which is not appropriately addressed by the political parties of the established political system (i.e., CDU/CSU, SPD, FDP, Green Party, and Left party).^{213,258}

More recently, several news reports were published in

Germany as part of disinformation targeting the Syrian refugees that were hosted in the Greek islands. For example, in 2020 a website claimed that the Interior Minister announced that refugees from Greece would be allowed in Germany, something that later was renounced by the Interior Minister himself.²⁵⁹ A research conducted by the Institute for Strategic Dialogue showed that both the AfD and far-right extremists were associated with anti-refugee disinformation. Additionally, evidence showed that anti-refugee disinformation in Germany was linked with related incidents in Greece, such as the events on Evros border, and with activists traveling to Greece during those events.

Other common topics of disinformation in Germany include linking refugees with crime or the Covid-19 crisis.²⁶⁰ The main narrative is about immigrants/refugees who are taken into the country under the cover of lockdown.²⁶¹ Also, false information in German media in March 2021 claimed that the majority of Covid-19 intensive care patients have an immigrant background.²⁶² Moreover, based on a fear of contamination some distorted stories claimed that immigrants do not accept any restrictions²⁶³ or they break the lockdown rules.^{264,265}

A study on German-language extremist social media showed that Covid-19 pandemic also led to increased Islamophobia and anti-Muslim conspiracy theories.²⁶⁶

Linking anti-immigrant disinformation with crime is also frequent in Germany. According to a false story, crimes were reported in Cologne on 2017 New Year's Eve, when immigrants raped more than 100 German women at the main square of the city.²⁶⁷ Other false claims present statistics on murder, rape, robbery and hooliganism which increased by 300-500%, after Germany allowed mass migration, without official statistics confirming this specific increase.

Anti-immigrant disinformation also portrays immigrants as an economic threat or as a threat to the German welfare state. For instance, a false story was spread, according to which kindergartens in Germany are not working properly because "the money goes to immigrants."²⁶⁸

255 <https://www.dw.com/en/five-years-on-how-germanys-refugee-policy-has-fared/a-54660166>

256 Fabian Zimmermann & Matthias Kohring (2020) Mistrust, Disinforming News, and Vote Choice: A Panel Survey on the Origins and Consequences of Believing Disinformation in the 2017 German Parliamentary Election, *Political Communication*, 37:2, 215-237, DOI: 10.1080/10584609.2019.1686095

257 <https://www.vice.com/en/article/mb98pb/germany-fake-news-election-migrants>

258 Igartua, J. J., & Cheng, L. (2009). Moderating effect of group cue while processing news on immigration: Is the framing effect a heuristic process? *Journal of Communication*, 59, 726-749. doi:10.1111/j.1460-2466.2009.01454.x

259 <https://www.infomigrants.net/en/post/33301/germany-website-spreads-false-information-about-apparent-new-open-door-refugee-policy>

260 <https://www.isdglobal.org/isd-publications/the-networks-and-narratives-of-anti-refugee-disinformation-in-europe/>

261 <https://Covidinfodemicurope.com/>

262 <https://getthetrollout.org/dig-deeper/germany-scapegoats-immigrants-Covid19>

263 <https://euvsdisinfo.eu/report/the-situation-with-Covid-19-in-germany-is-worsening-because-of-migrants>

264 <https://voiceofeurope.com/2020/03/immigrants-violently-defy-coronavirus-quarantines-in-germany-hungary/>

265 <https://www.radicalrightanalysis.com/2020/04/10/how-is-the-far-right-capitalizing-Covid-19/>

266 Guhl J., and Gerster L., Crisis and Loss of Control: German-Language Digital Extremism in the Context of the Covid-19 Pandemic, ISD, 2020.

267 <https://euvsdisinfo.eu/report/migrants-responsible-for-increase-in-robberies-murders-and-rapes-in-germany>

268 <https://euvsdisinfo.eu/report/money-to-teach-children-in-kindergartens-now-goes-for-migrants-in-germany>

Russia also has a big role in spreading such disinformation in Germany. The EU's East StratCom Task Force identified more than 2,500 examples in 18 languages of stories presenting false information originating from Russia. As mentioned in their report "The aim of this disinformation campaign is to weaken and destabilize the West, by exploiting existing divisions or creating artificial new ones."²⁶⁹ Exploitation of the fear of migrants and refugees and local minority issues is among the topics of Russia-originated disinformation in several EU countries, including Germany. A report from the EU East StratCom Task Force²⁷⁰ reviews several such disinformation stories, including a story about Muslims setting on fire the oldest church in Germany, stories about migrants raping or harassing women, etc. Those aim to fuel negative emotions towards refugees. In addition, in February 2020 Facebook removed a network of accounts that belonged to Russia's military intelligence services targeting Germany and sharing anti-immigrant and anti-Muslim content and sometimes content supporting the AfD.²⁷¹

Climate change

As previously explained, disinformation regarding climate change can manifest in many forms, one of which is through denying the existence of the issue altogether. In Germany, the right wing-party AfD can be characterized as denialists and they reject all national and EU actions towards fighting the climate change and its negative effects.²⁷² The AfD withdrew from the Intergovernmental Panel on Climate Change²⁷³ (IPCC) and the climate agreement of Paris,²⁷⁴ and actively promotes that climate change is something that does not exist, that human-made CO₂ emissions do not damage the environment, calls the appearance of extreme weather fake news and describes climate policies as hysteria.²⁷⁵ As reported by Correctiv and Frontal21,²⁷⁶ another actor promoting climate change denialism in Germany is the American Heartland²⁷⁷, a US libertarian and climate sceptic think-tank. The report reveals that Heartland proposed an anti-climate spin campaign that would focus on rolling back prohibitive climate laws. They also cooperate with AfD, trying to recruit young influencers to promote such

beliefs in their target audience. It also reveals that Heartland has a broad disinformation strategy including paid scientists and experts that were willing to downplay the health impact of diesel pollution and coal-fired power plants if they were "properly funded". Instead of outright denying science, their aim is to sow doubt by promoting points such as the "false doctrine" of climate change and branding climate activists as "hysterical alarmists".

POLITICAL INTERESTS AND DISINFORMATION IN GREECE

Media independence

The Media Pluralism Monitor report²⁷⁸ is attempting to document and monitor the health of media in several EU countries. Among other topics, they assess and measure the political independence of media. During their latest assessment in 2021, they present study results related to media pluralism and political independence in Greece. The indicator of political independence ranks Greece as high risk in three out of five sub-indicators²⁷⁹, namely "political independence of media", "editorial autonomy" and "Independence of PSM governance and funding." The high risk of these indicators arises due to:

- the lack of legal safeguards regarding the indirect media ownership as well as the lack of regulatory safeguards about the independence of news agencies;
- the absence of measures related to editorial independence from political interference;
- and the lack of safeguards regarding appointment procedures in management positions of state-owned public radio and television broadcasters.

The results of the aforementioned report are not surprising when considering that currently most media outlets in Greece are owned by a few businesspersons with close ties with the ruling parties. This often means that the government can exert indirect control of what is reported by those outlets, which affects the quality of journalism.²⁸⁰ A result of this is the gradual loss of trust in the mainstream media, such as traditional television and preference towards online means of information.²⁸¹

269 <https://euvsdisinfo.eu/commentary-means-goals-and-consequences-of-the-pro-kremlin-disinformation-campaign/>

270 <https://us11.campaign-archive.com/?u=cd23226ada1699a77000eb60b&id=8a3e5d1155>

271 <https://graphika.com/reports/from-russia-with-blogs/>

272 <https://www.adelphi.de/en/system/files/mediathek/bilder/Convenient%20Truths%20-%20Mapping%20climate%20agendas%20of%20right-wing%20populist%20parties%20in%20Europe%20-%20adelphi.pdf>

273 https://unfoundation.org/blog/post/intergovernmental-panel-climate-change-30-years-informing-global-climate-action/?gclid=EAlaIqobChMgNWks56X6AIVjLTtCh1CsQDCEAAAYASAAEgJbovD_BwE

274 <https://dserver.bundestag.de/btd/19/224/1922450.pdf>

275 <https://www.theguardian.com/world/commentisfree/2020/mar/18/climate-change-denial-germany-far-right-afd>

276 <https://www.zdf.de/politik/frontal/undercover-bei-klimawandel-leugnern-100.html>

277 <https://correctiv.org/en/top-stories-en/2020/02/11/the-heartland-lobby/>

278 <https://cmpf.eui.eu/mpm2021-results/>

279 <https://cadmus.eui.eu/handle/1814/71948>

280 <https://ipi.media/the-Covid-19-crisis-highlights-greeces-media-problem/>

281 https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2019-06/DNR_2019_FINAL_0.pdf

Covid-19 disinformation

Disinformation about Covid-19 in Greece is closely related to several conspiracy theories, including blaming refugees and immigrants, 5G, narratives about Bill Gates, and more. A study conducted by the DCN SEE HUB, the Forum Apulum and the Peace Journalism Lab presents several different categories of disinformation narratives that have predominated in Greece. The categories that are most popular are narratives against the government and claims for overreporting Covid infections and deaths, as well as disinformation related to refugees and immigrants, autovaccination claims and other health and medical issues.²⁸²

Even though immigrant and refugee related theories are not the most popular, they were quite an important topic in relation to Covid-19. For example, several stories were published about refugees not following the social distance guidelines causing a larger spread of the virus, or that the lockdown happened in a time where Greeks could not celebrate Easter but the Ramadan would be celebrated without any issues.²⁸² Such observations lead to questioning the people behind these stories. The same study concluded that the main people that spread disinformation through social media about Covid-19 in combination with refugees can be divided in three categories: people that tend towards nationalism, people that are conservative and people that have conspiracy tendencies. In Greece, the most common characteristic was nationalism followed by conspiracy tendencies.²⁸³

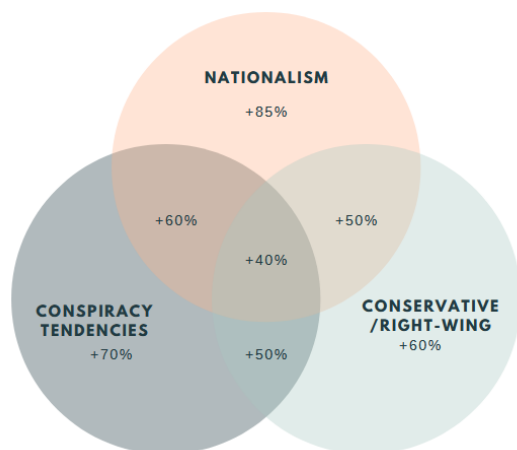


Figure 12 - Profiles of people that spread disinformation in social media in Greece²⁸³

Disinformation regarding Covid-19 includes rumours

about alternative medicine that can be used to fight the virus, but are not promoted by the government and pharmaceutical companies in order to promote and make money of the vaccines. For example, in May 2020 the Greek National Council for Radio and Television (NCRTV) imposed sanctions to several TV stations.^{284,285} Similarly, there have been several broadcasts both on TV but also on radio that promoted inaccurate information regarding Covid-19. For example, in 2020 during a broadcast show in EUROPE ONE TV channel several false claims were presented, for which the channel was fined with the amount of 30,000 euros.²⁸⁶ Another example includes some episodes of a Radio show hosted by the journalist Georgios Tragkas in several local radio stations, a TV channel as well as some websites.²⁸⁷ Specifically, for Tragkas, it became clear that he was trying to win over voters, targeting anti-vaxxers and Covid deniers, for his newly created right-wing party. On the other hand, based on research conducted by Marc, most anti-vaxxers are supporting parties from both the left, such as Syriza (19.6%) and the right wing, such as Greek Solution (16.4%).²⁸⁸ Although the number for Syriza is comparable to their national election poll numbers and even lower (23% according to same Marc poll), this is not the case for the Greek Solution party that polls around 4.5% nationally but is extremely popular among anti-vaxxers. The same research showed that most supporters of the Greek Solution leader (Kyriakos Velopoulos) are anti-vaxxers.

Another big part of the disinformation spread comes from the Greek Orthodox Church. While the Greek government was setting social distancing rules in order to limit the spread of the virus, Greek priests were urging their followers to ignore the measures. Exemplary is the fact that they were suggesting that people would not contract the virus when getting the Holy Communion using the same spoon, since that is considered the body and blood of Jesus. Interesting is also the fact that the Archbishop was against the aforementioned stance and he was clearly and loudly supporting the measures set by the government to fight the spreading of the virus.²⁸⁹

Finally, an interesting case of Covid-19 disinformation regards four different webpages (Brighteon.com, rumble.com, ugetube.com, ellinesithagenis.gr) that are managed by anti-vaxxers and were actively pushing disinformation on different topics, among which is Covid-19. They were identified by the Cyber Crime division of the Greek Police Authority and, along with some related

282 <https://digicomnet.medium.com/a-racist-aspect-of-Covid-19-disinformation-in-greek-social-media-9e5118942dbb>

283 <http://dcn-see.org/tpost/y4415isima-fake-news-hunters-part-2>

284 <https://esr.gr/ανακοίνωση-ογκικά-με-προϊόντα-που-δίν/>

285 <https://diavgeia.gov.gr/doc/QN1EIME-ΦΒ9>

286 <https://diavgeia.gov.gr/doc/ΨQ7OIME-ΟΣΔ>

287 https://www.avgi.gr/koinonia/386893_se-mpelades-enea-radiofona-logo-tragka

288 <https://www.capital.gr/epikairoτητα/3584283/dimoskopisi-marc-ti-psifizouin-oi-anemboliastoi>

289 <https://www.nytimes.com/2020/12/05/world/greece-orthodox-church-coronavirus.html>

Facebook and Twitter profiles, they were prosecuted with the accusation that they are urging the citizens to take actions against public health, safety and the State. By autumn 2021, there was no decision on sanctions towards the administrators of the websites.²⁹⁰

Immigration disinformation

Greece has always been a country with immigration issues especially due to its strategic position. In the last decade, the peak of immigration occurred in 2015 when nearly 900 thousands of immigrants/refugees entered the country as a result of the Syrian crisis. Since then, there has been a decrease but the issue remained one of the most central in public debate.²⁹¹

Along with the immigration/refugee issues, anti-refugee disinformation is also something that is very much alive in Greece. Recent research conducted by the Institute for Strategic Dialogue (ISD) found that this disinformation not only originates by extremists and far-right networks but also from mainstream right and pro-government networks. For example, it was found that there was a convergence on the messaging across platforms during major incidents involving refugees, such as the fires in the refugee camp in Moria Lesvos in September 2020. The same ISD research showed that elected officials play a key role into refugee disinformation and hatred since comments made by such officials, specifically members of the current governing party New Democracy, helped fuel such disinformation narratives. For example, a post that included false information regarding the deaths of refugees on the Greece/Turkey border made by a Greek government spokesperson (Stelios Petsas) was widely shared.²⁹² Accusations for "fake news" were made also by the migration minister Notis Mitarakis on the topic of migrant pushbacks back to Turkey. In early 2021, the NGO Mare Liberum said that they had documented close to 10,000 pushbacks in the Greek-Turkish border only in 2020.²⁹³ They claimed that both the Greek coast guard also the European border agency Frontex are involved in these incidents. These accusations were declined by both the Greek government and Frontex. The Greek minister suggested that these allegations and "fake news" may

originate from smugglers that had probably lost millions of euros due to the Greek government's efforts.²⁹⁴ Another practice the Greek media sometimes follow is to present past news as current, especially for incidents that involve refugees. For example, for such an incident a known TV channel was fined with 30.000 euros in 2020.²⁹⁵ Another related situation that arises in Greece pertains to the obstruction of the press. In relation to the incidents on Lesvos, it was said that Greek government limited the access to the island for journalists, and more specifically for some press correspondents from Germany and France. This fact was condemned by sending an open letter²⁹⁶ to the Greek authorities signed by seven press freedom organizations.²⁹⁷ Such events have resulted in Greece ranking 65th out of 180 countries in the RSF's 2020 World Press Freedom Index.²⁹⁸

Climate change disinformation

A recent study showed that around 87% of Greek people are concerned that climate change will personally harm them during their lifetime. Additionally, from the ones participating in the research around 90% are willing to make a change to help reduce the effects of climate change.²⁹⁹

Nevertheless, the Greek fact-checking website is marking several public climate change-related statements in Greek media as fake.³⁰⁰ Some of the news that were fact-checked include articles about the climate change happening due to volcanos,³⁰¹ that a Greenpeace co-founder claimed that global warming is a scam, that Margaret Thatcher created the climate change issue, or, at the other end of the spectrum, that Greenland lost 40% of its ice in a few hours or that the destruction of the planet is imminent. In most cases, these cases of disinformation repeat news or conspiracy theories that have already circulated online by foreign media or actors. Greece's pro-Nazi, extreme right-wing party, Golden Dawn, did not clearly acknowledge the climate change issue, but they were not opposed to it either. In the European proposals related to climate and energy, they were split between "against" and "for".³⁰²

290 <https://www.thetoc.gr/koinwnia/article/entopistikani-oi-protas-4-istoselides-arniton-pou-diadidoun-fake-news-ellines-autoxthones-ithageneis-kai-ugetube/>

291 <https://data2.unhcr.org/en/situations/mediterranean/location/5179>

292 <https://www.isdglobal.org/wp-content/uploads/2021/07/The-networks-and-narratives-of-anti-migrant-discourse-in-Europe.pdf>

293 <https://www.infomigrants.net/en/post/30229/unprecedented-rights-violations-against-migrants-in-aegean-sea-ngo>

294 <https://euobserver.com/migration/151392>

295 <https://diavgeia.gov.gr/doc/QΣΜΑΙΜΕ-8ΜΕ>

296 <https://www.ecpmf.eu/concerns-over-access-for-media-workers-in-greece/>

297 <https://rsf.org/en/news/greek-police-uses-brutal-violence-and-arbitrary-bans-obstruct-reporting-refugee-crisis>

298 <https://rsf.org/en/ranking>

299 <https://www.pewresearch.org/global/2021/09/14/in-response-to-climate-change-citizens-in-advanced-economies-are-willing-to-alter-how-they-live-and-work/>

300 <https://www.ellinikahoaxes.gr/tag/κλιματική-αλλαγή/>

301 <https://www.ellinikahoaxes.gr/2021/10/03/volcanoes-climate-change-pseudoscience/>

302 <https://www.adelphi.de/en/system/files/mediathek/bilder/Convenient%20truths%20-%20Mapping%20climate%20agendas%20of%20right-wing%20populist%20parties%20in%20Europe%20-%20adelphi.pdf>

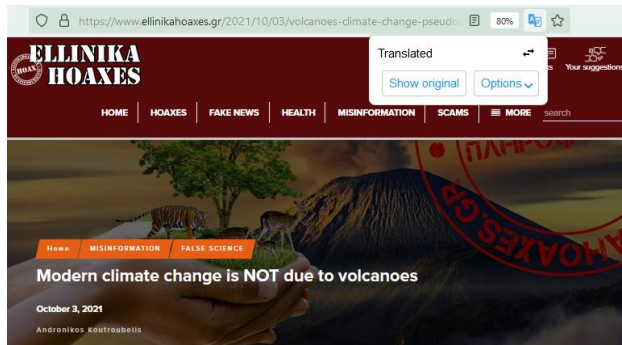


Figure 13 - Example of false news about climate change in Greek media by the Greek fact-checking organisation³⁰¹

POLITICAL INTERESTS AND DISINFORMATION IN ITALY

Politics and disinformation

As shown in the MPM study,³⁰³ Italy has a medium risk (49%) regarding the political independence of the press. There is variance regarding the risk of the sub-indicators, i.e. there is one with low risk and another with high, but most are at medium risk. The medium risk is attributed to the lack of effective laws or the existence of laws that do not tackle the problems adequately. For example, the sub-indicator “Independence of PSM governance and funding” is marked as high risk (83%) due to the fact that even though there is a law that requires a public call for the candidates of the board of PSM, in its first implementations in 2018, no one applied it. Additionally, selection criteria were not made public. Another example that shows the risk of political dependence is the fact that there are no rules regarding online political advertising. Prominent examples of disinformation in Italy come from the 2019 European elections. The main controversial and polarizing topics of debate at the time were immigration, national safety and nationalism. In a study focused on deceptive information circulating on Twitter before the 2019 European elections,³⁰⁴ it was shown that a large variety of articles that included propaganda, hyper-partisan and conspiratorial news were shared in Italy prior to the elections by a limited heterogeneous community. This was also the case during the previous Italian pre-electoral period; a study on disinformation on the Italian Facebook ecosystem, connects disinformation with troll posts, as a response to partisan debates, where

arguments debated by political activists or on alternative information sources, provide parodist imitations of a wide range of online partisan topics.³⁰⁵ Mocanu et al. show that misinformation was particularly likely to be shared by users who mistrusted the mainstream media. Pierri et. al. found that the most influential accounts involved in disinformation were connected to the Italian far-right and conservative community.³⁰⁶ Among the main targets of misinformation campaigns was Partito Democratico; while there is empirical evidence that suggests that the far-right party Lega, and the populist party Movimento 5 Stelle, are the parties that profited the most from exploiting hoaxes and misleading reports related to their populist and nationalist views.^{92,307}

The large amount of disinformation, especially when it regards elections, would naturally arise the question whether they affect voting behaviour or not. The research³⁰⁸ examining data about the Italian general elections in 2018 concluded that disinformation each person is exposed to, directly relates to their personal political choices and online presence. They point out that misinformation bubbles and echo chambers are playing a key role to the final preference of the public but whether someone will end up being inside of a bubble depends on their initial preferences.

To address the issue of disinformation, Italy has launched the Italian Digital Media Observatory with the objective to curb disinformation by promoting scientific knowledge on the issue, advance the fact-checking services as well as support media literacy programmes.³⁰⁹

Covid-19 disinformation

Disinformation related to Covid-19 is very common in Italy. The risk of the infodemic is mostly due to the activity of unverified sources. However, there is evidence that with the outbreak and escalation of the pandemic, the production of misinformation drops, and there is a shift of people towards more reliable sources.³¹⁰ For instance, the same study shows that since the first severe verified domestic contagions in Italy in March 2020, there is a sudden increase in national Google searches for the best-known Italian virologists as they gained substantial visibility on national mainstream media, which could be an indication of a shift of the public from unreliable to reliable sources in online social media conversations.³¹⁰

303 <https://cadmus.eui.eu/handle/1814/71951>

304 <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0227821>

305 Delia Mocanu, Luca Rossi, Qian Zhang, Marton Karsai, Walter Quattrociocchi, Collective attention in the age of (mis)information, *Computers in Human Behavior*, Volume 51, Part B, 2015, Pages 1198-1204, <https://doi.org/10.1016/j.chb.2015.01.024>

306 Pierri, F., Artoni, A., & Ceri, S. (2020). Investigating Italian disinformation spreading on Twitter in the context of 2019 European elections. *PloS one*, 15(1), e0227821.

307 Cantarella M, Fraccaroli N, Volpe R. (2019) Does Fake News Affect Voting Behaviour? Available at SSRN: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3402913

308 <https://ideas.repec.org/p/mod/depeco/0146.html>

309 <https://www.euractiv.com/section/digital/news/italy-launches-national-hub-to-fight-disinformation/>

310 Gallotti, R., Valle, F., Castaldo, N. et al. Assessing the risks of ‘infodemics’ in response to Covid-19 epidemics. *Nat Hum Behav* 4, 1285–1293 (2020).

<https://doi.org/10.1038/s41562-020-00994-6>

Several false stories have been written and fact-checked such as the ones identified by IFCN.³¹¹ This large amount of disinformation shared in Italian media has led the Italian government to create a page that presents the most popular false information on the Web. Such an example is the case of Matteo Salvini, the leader of the right-wing party Lega, who shared in a Facebook post the theory that the virus was created in a laboratory.^{312,313}

Covid-19 was not only exploited by national individuals and organizations as a means to spread disinformation and serve their own interests, but also by foreign powers to target Italy. More specifically, Russia and China took advantage of the relatively low support that the European Union has given to Italy while they were in a vulnerable position in the beginning of the pandemic. They used the situation to try to pass their own agendas and to increase the anti-EU, anti-NATO and anti-US sentiment of Italians. More specifically, a story that proved to be false was related to a shipment of medical supplies Russia had sent to Italy. A Russian Senator tweeted that Poland did not let the shipment pass through the country; as a result, the plane had to take a longer route to reach Italy, a claim that was denied by the Polish government. These unverified claims had great traction on the Internet with several posts, views and engagements from thousands of people, which gave the opportunity to anti-EU and pro-Kremlin Italians to promote their distrust to the European Union and express their gratitude towards Putin and Russia in general.³¹⁴

Russia was not the only country that took advantage of the hard situation Italy was in. China also followed a similar approach using disinformation to promote their own narratives, having the support of the populist Five Star Movement political party, which helped them with promoting their anti-EU and anti-US narratives. More specifically, China, similarly to Russia, sent medical aid to Italy, something that was vastly promoted in social media including the hashtag #grazieCina with the ultimate aim to show how China provided more support than EU or US when Italy was in need.³¹⁵ Part of this disinformation campaign were videos circulating on social media showing people clapping for the medical aid coming from China. It was shown that these were doctored videos extracted from original videos showing people clapping for their medical workers. Additionally, China promoted the theory that the virus originated from Italy along

with the one that it originated from the US.³¹⁶



Figure 14 - Examples of disinformation in Italian media from foreign sources^{317,318,314}

Immigration disinformation

Disinformation about immigration is a common issue in many European countries especially since the Syrian crisis. Immigration is a salient issue in Italian politics, especially between 2014 and 2017, when a large number of immigrants entered Italy³¹⁹ through Sicily.³²⁰ At the end of 2017, several popular Italian websites and Facebook pages appeared as news organizations, but trafficked in misinformation, posting misleading stories that echoed nationalist and Islamophobic rhetoric.³²¹ Nowadays, illegal immigration is still one of the key points in the right-wing political parties' agendas³²² (e.g. the League), and parties that promote anti-immigrant views (e.g. the Five Star Movement), in the 2018 election campaign. Scholars argue that fake news contributed significantly to the electoral success of these parties.³²³

With the rise of the Covid-19 pandemic, disinformation about immigrants switched from them bringing a risk to Italian economy, to them being responsible for the high number of Covid-19 cases. It was shown that a big alternative media network was spreading anti-immigrant "stories" that proved to be disinformation but had a large

311 https://www.poynter.org/ifcn-Covid-19-misinformation/?Covid_countries=47405&Covid_rating=0&Covid_fact_checkers=0

312 <https://www.thenewfederalist.eu/the-effect-of-Covid-19-disinformation-across-europe?lang=fr>

313 <https://time.com/5789666/italy-coronavirus-far-right-salvini/>

314 <https://medium.com/dfrlab/russia-exploits-italian-coronavirus-outbreak-to-expand-its-influence-6453090d3a98>

315 <https://medium.com/dfrlab/china-exploits-italian-coronavirus-outbreak-to-expand-its-influence-967a6998fea3>

316 https://www.ifj.org/fileadmin/user_upload/210512_IFJ_The_Covid_Story_Report_-_FINAL.pdf

317 <https://archive.vn/X6OBV>

318 <https://www.facebook.com/1663899447222803/posts/2564731400472932>

319 <https://www.statista.com/statistics/623514/migrant-arrivals-to-italy/>

320 <https://www.pri.org/stories/2017-12-30/italys-migrant-crisis-saw-huge-turning-point-2017>

321 https://www.buzzfeed.com/albertonardelli/one-of-the-biggest-alternative-media-networks-in-italy-is?utm_term=.qlGOVlpRk#.mu5yLXRWM

322 <https://www.economist.com/europe/2021/05/22/italys-populist-right-looks-menacing>

323 <https://www.american.edu/soc/news/italy-fake-news-helps-populists-and-far-right-triump.cfm>

amount of engagement nonetheless.³²⁴ Such false stories and propaganda can lead people to increased hostility towards refugees. Popular theories against migrants and coronavirus were in the beginning of the pandemic that they are “immune” to the virus and later on that they were the “carriers” of the virus.³²⁵ Based on the narrative that immigrants do not obey to the restrictions of Covid-19 or the lockdown rules, Severino Nappi, Regional Councilor of the Lega, tweeted about it presenting a video that had been filmed in earlier times.³²⁶

Similarly with the immigrants from Africa, Roma have been targeted with disinformation by the right-wing parties with accusations such as them being a health threat,³²⁷ where in reality not only they were not at fault for the high number of cases but they were also in much higher risk of death from the virus.³²⁸ Moreover, far-right parties spread disinformation about the Roma breaching Covid-19 restrictions, via social media platforms.³²⁸

In March 2018, the Hungarian Foreign Minister Péter Szijjártó (member of Fidesz, a right-wing, national-conservative political party in Hungary) contributed to the spread of the false news regarding the Global Compact for migration, issued in the main public TV channel, saying that “The document acquired by Hungarian public television M1 indicates that the European Commission is working in secret to make the Global Compact binding for all states.”³²⁹ The false news spread rapidly in most parts of Europe, mainly by far-right outlets, among them Italy, where the false news was mentioned also by mainstream conservative media, and repeated by some political actors.³³⁰

Another fabricated story, targeted Nicola Zingaretti of Italy's Democratic Party suggested he was planning to ask the EU to issue a directive to “open all Italian ports” after the elections to allow the entrance of 800,000 Libyan refugees.³³¹ Chiara Appendino, a member of the Five Star Movement and mayor of Turin was accused of converting the city of Turin into a “halal city”.³³² However, the original article was published in 2017 and referred to a meeting with tourism carriers prior to a forum of Islamic Finance and it was debunked prior to the election.

Another example of disinformation in Italy was before the EU elections of 2019, using the popular hashtag #EUElections2019 in a video where a man, who they claimed was a Muslim immigrant, was vandalizing a monument in Italy. The video had more than 2.7 million views, but then it was reported as fake since the original video was filmed in 2017 in Algeria.³³³ In line with Islamization narrative, another viral video posted on Twitter having the title the “Islamisation” of Europe, presented hundreds of Muslims gathering near Rome's world-famous Colosseum.³³⁴ However, the video was filmed in October 2016 during a protest by hundreds of Muslims against the closure of mosques in Italy.³³⁵ Moreover, a story with anti-immigrant content was fabricated just before the election, without being clear by whom and it was about a 9-year-old Muslim girl who was hospitalized after being sexually assaulted by her 35-year-old “husband” in the city of Padua.³³⁶

Issues related to immigration, crime and national safety were highlighted as the most debated topics of disinformation during the 2019 European Parliament elections.³⁰⁶ The same study provided evidence of links between Italian disinformation sources and other outlets across Europe, U.S. and Russia, featuring similar, even translated, articles in the period before the elections.^{Error!} Bookmark not defined. in particular, strong ties were observed with “Lega” party, since most of the users manifested explicit affiliation or support to the party agenda via keywords and hashtags.

Climate change disinformation

Italy is one of the countries in Europe with high awareness (90%) of issues on climate change and its anthropogenic causes based on a study conducted by dpart, a German think tank, and the Open Society European Policy Institute in 2020. The same study finds that 73% of the respondents agree with the statement that “we should do everything we can to stop climate change”. In addition, they report that people from the right part of the political spectrum are less likely to believe (32%) that climate change will have a negative impact on their own life than

324 https://www.buzzfeed.com/albertonardelli/one-of-the-biggest-alternative-media-networks-in-italy-is?utm_term=.qlGOVlpRk#.mu5yLXRWM

325 <https://lacuna.org.uk/blog-archive/how-Covid-and-fake-news-fuelled-anti-immigrant-sentiment-in-italy/>

326 https://twitter.com/severino_nappi/status/1239823334289874945

327 <https://www.theguardian.com/commentisfree/2020/feb/28/coronavirus-outbreak-migrants-blamed-italy-matteo-salvini-marine-le-pen>

328 <https://reliefweb.int/sites/reliefweb.int/files/resources/Roma%20in%20the%20Covid-19%20crisis%20%20An%20early%20warning%20of%20six%20EU%20Member%20States.pdf>

329 Péter Szijjártó, The greatest lie told by Brussels to date has been revealed, March 11, 2019 (<https://www.kormany.hu/en/ministry-of-foreign-affairs-and-trade/news/the-greatest-lie-told-by-brussels-to-date-has-been-revealed>)

330 Massimo FLORE, Understanding Citizens' Vulnerabilities (II): from Disinformation to Hostile Narratives, EUR 30029 EN, Publications Office of the European Union, Luxembourg, 2020, ISBN 978-92-76-14308-6, doi:10.2760/271224, JRC118914

331 <https://www.bufale.net/zingaretti-ed-il-falso-meme-leghista-sullaccoglienza-di-800-000-profughi-libici-parole-inventate/>

332 <https://monitoring.bbc.co.uk/product/c200tx5h>

333 <https://monitoring.bbc.co.uk/product/c200tx5l>

334 <https://twitter.com/SapereAudeDE/status/113019490221037568>

335 <https://www.reuters.com/article/us-italy-mosques/muslims-pray-at-colosseum-protesting-against-rome-mosque-closures-idUSKCN12L2AU>

336 <https://www.theatlantic.com/international/archive/2018/02/europe-fake-news/551972/>

the people in the center (39%) or left (47%), but still the differences are not that large.³³⁷ All the above can be an indication of good climate change literacy in the country as well as minimal “fake news” and climate change denial. The climate literacy is also supported by the fact that Italy aims to include lessons on climate change and sustainability in the civics curriculum in every grade.³³⁸

An example of disinformation is a 2019 petition called “Petition on anthropogenic global warming”³³⁹ that was signed by 83 people, in part scientists, and was sent to the presidents of the Chamber of Deputies, the Council, the Republic and the Senate. This included false information and the scientific blog *climalteranti.it* managed to fact-check³⁴⁰ it and prove that the signatories, with few exceptions, had no knowledge on climate science.³⁴¹

Most Italian parties were not particularly environment-focused in the past, except for the Green Party. Nowadays, a growing interest in climate change policy has emerged in the Italian political debate; however, the debates among political actors are largely unpolarized, except for certain issues, promoting a coalition around core strategies.³⁴² Generally, Italian politicians are not against nor deny the climate change issue. Traditionally, left parties have always had an industrialist culture, while right parties were against climate change legislation and other climate change initiatives.³⁴³ For instance, Berlusconi’s government was against the 2008 European legislative proposal on energy and climate change, because it would be harmful to Italian industries.³⁴⁴ More recently, the situation changed and a discourse of coalitions emerged from the political debate on climate change in Italy.³⁴² The Italian right-wing party Lega has clearly stated that the anthropogenic climate change exists and that it is necessary for measures, national or otherwise, to be taken in order to tackle the issue.³⁴⁵ Similarly, the Five Star Movement created in 2005 as an anti-establishment party, and one of its main objectives was the protection of the environment, a stance used in

their election campaigns especially in 2013.³⁴⁶

POLITICAL INTERESTS AND DISINFORMATION IN SPAIN

Politics and disinformation

Based on the Media Pluralism study (MPM),³⁴⁷ Spain has medium risk (47%) with regard to political independence of the press. This is due to a lack of specific regulations about political control of media. For example, there is political influence on private media organisations, e.g. on the appointment and dismissal of editors-in-chief even despite the lack of media ownership by political actors. Moreover, attempts towards the creation of laws about elections and governance of public media services have not converged among parties and thus not implemented. Additionally, as identified by the EBU research about trust in media,³⁴⁸ Spaniards have low trust in media, including broadcasting media, legacy media and online media. Also, as reported by AVAAZ, although Spanish is the fourth most spoken language in the world,³⁴⁹ Facebook does not enforce in the same way its anti-disinformation policies on Spanish content compared to English content.³⁵⁰ More specifically, this research found that even though 70% of the disinformation on Facebook in English is flagged, only 30% of disinformation stories in Spanish are flagged due to lack of effective moderation mechanisms.³⁵¹

A study focusing on social bots during the 2019 Spanish General Elections, found that social bots targeted the mainstream national events supporting each of the five principal political parties. In addition, social bots interacted with more than one political party with similar ideology and they seemed against political parties opposed to the inferred ideology. Specifically, social bots related to both right (PP and VOX) and left wing (PSOE and UP) parties appear to be closely connected. Instead, the central party (Cs) does not report a high level of interaction within the network.³⁵²

337 https://dpart.org/wp-content/uploads/2020/11/Comparative_report.pdf

338 <https://thehill.com/policy/energy-environment/469198-italy-to-require-students-to-study-climate-change-and>

339 <http://www.scienzanazionale.it/e-nata-astri-per-la-ricerca-italiana/petizione-sul-riscaldamento-globale-antropico/>

340 <https://www.climalteranti.it/2021/02/01/gli-uomini-di-scienza-che-negano-lorigine-antropica-del-riscaldamento-globale-si-occupano-raramente-di-clima/>

341 <https://www.corriere.it/dataroom-milena-gabanelli/clima-riscaldamento-globale-chi-finanzia-fake-news-ambiente-c02-social-inquinamento-salvare-pianeta-pericolo-emissioni-disinformazione/0c83cd40-a769-11eb-b37e-07dee681b819-va.shtml>

342 Ghinoi, Stefano and Steiner, Bodo (2020) The political debate on climate change in Italy: a discourse network analysis. *Politics and Governance*, 8 (2). pp. 215-228. ISSN 2183-2463 (doi: <https://doi.org/10.17645/pag.v8i2.2577>)

343 Carter, N., Ladrech, R., & Little, C. (2014). Political parties’ climate policies in the UK, Italy and Denmark. Paper presented at the ECPR General Conference 2014, Glasgow. Retrieved from <https://ecpr.eu/Filestore/PaperProposal/f51e32ac-9212-4623-813f2fc6a4040668.pdf>

344 Carbone, M. (2009). Italy in the European Union, between Prodi and Berlusconi. *The International Spectator*, 44(3), 97-115. <https://doi.org/10.1080/03932720903148914>

345 <https://www.greeneuropeanjournal.eu/nationalising-the-climate-is-the-european-far-right-turning-green/>

346 https://ecfr.eu/article/commentary_the_european_green_deal_a_political_opportunity_for_italy/

347 <https://cadmus.eui.eu/handle/1814/71963>

348 https://www.ebu.ch/publications/research/login_only/report/trust-in-media

349 <https://www.statista.com/statistics/266808/the-most-spoken-languages-worldwide/>

350 <https://www.theguardian.com/technology/2021/mar/03/facebook-spanish-language-misinformation-Covid-19-election>

351 https://secure.avaz.org/campaign/en/facebook_coronavirus_misinformation/

352 J. Pastor-Galindo et al., "Spotting Political Social Bots in Twitter: A Use Case of the 2019 Spanish General Election," in *IEEE Transactions on Network and Service Management*, vol. 17, no. 4, pp. 2156-2170, Dec. 2020, doi: 10.1109/TNSM.2020.3031573.

To address disinformation, the Spanish government aims to monitor the internet for fake stories. To this end, the National Security Council approved the "Procedure for Intervention against Disinformation", which proposes that the Spanish government should take measures against disinformation campaigns. Such initiatives first started under the previous government led by conservative Popular Party (PP) and continued under the Socialist Party (PSOE), who passed the new protocol.³⁵³

Covid-19 disinformation

Covid-19 has been a common topic for disinformation stories, some of which were identified and documented by IFCN.³⁵⁴ Popular cases include people being vaccinated without their consent, vaccines being unsafe for humans or with unverified side-effects and many more. Additional topics include misinformation about medicine,³⁵⁵ natural remedies,³⁵⁶ breathing tests³⁵⁷ and even nicotine.³⁵⁸ False stories in Spain circulate through messaging apps, such as Telegram and WhatsApp, as well as social networks.³⁵⁹ At the same time, a study released by the Reuters Institute shows that people in Spain attribute most responsibility for Covid-19 disinformation to politicians.³⁶⁰

A large number of protests against the strict measures for protecting the population from Covid-19 took place in Spain, similarly to many other European countries. These protests along with many of the Covid-related conspiracy theories were promoted through Facebook and Twitter. These platforms have attempted to shut down accounts that promote false stories as well as remove the false information. This led people to the Telegram messaging app. For example, a popular Telegram channel in Spain is called Noticias Rafapal and was created by Rafael Palacios, a journalist also known for his interest in several conspiracy theories for which he has authored several books.³⁶¹ Palacios proclaims to be one of the first to denounce the Covid-19 conspiracy.³⁶² His channel that reaches 137,000 subscribers³⁶³ posted several articles that spread false information. A lot of these articles were

originally published in Russian-backed Spanish-language media such as the RT en Español.³⁶⁴

Another source of disinformation in Spain are far-right groups, such as the Vox party. Vox has often spread false information about the government and used Telegram channels, such as Noticias Rafapal, to spread their agenda and increase their supporters.³⁶⁵ A study made by ElDiario makes an analogy of Vox's disinformation to the flat Earth movement.³⁶⁶ An example of the type of disinformation made by Vox is a post published in the party's Twitter account and then vastly shared that showed a doctored photo of Madrid's Gran Vía filled with coffins; they commented that this was something the government wanted hidden.³⁶⁷ Adding to this, they were the only ones that accused the fact-checking website Maldita.es for restricting their freedom of speech because they were debunking their statements. Later on, Maldita.es replied that the statements of Vox comprise only 10% of the ones they fact-check.³⁶⁸

The spread of false information has affected the beliefs of Spaniards on Covid and vaccines. According to a survey by the pollster 40dB, which was conducted on behalf of El País in November 2020, far right supporters were the most reluctant to get vaccinated (22.3%), whereas conservative supporters (PP) were next in line (11.8%). Another finding of the same survey showed that 40% of Spaniards believed in some sort of conspiracy behind the vaccines, while the percentage rises to 55% when talking about Vox voters. Adding to this, 65% of Spaniards believe the coronavirus was manufactured, which goes up to 85% among Vox voters.³⁶⁹ Almost a year after this survey, the vaccination rates of Spain increased and a total of 79.3% of people had at least one dose (the equivalent of the 90% of population able to get vaccinated), with the anti-vaxxers now representing only 4% of the population.³⁷⁰

Immigration disinformation

In Spain, immigration is an issue that caused increased concern among Spaniards between 2017 and 2020,

353 <https://english.elpais.com/politics/2020-11-09/spain-to-monitor-online-fake-news-and-give-a-political-response-to-disinformation-campaigns.html>

354 <https://www.poynter.org/ifcn-Covid-19-misinformation/>

355 <https://maldita.es/malditaciencia/20210903/mms-clorito-sodio-coronavirus-cientifico-aleman-cura/>

356 <https://maldita.es/malditobulo/20200315/enjuagarse-garganta-prevenir-coronavirus/>

357 <https://maldita.es/malditobulo/2020/03/22/contagio-coronavirus-contener-respiracion-sorbos-agua-15-minutos/>

358 <https://maldita.es/malditaciencia/2020/05/06/nicotina-coronavirus-estudio-francia/>

359 <https://www.statista.com/statistics/1167849/Covid-19-information-false-or-deceitful-by-source-of-information-in-spain-2020/>

360 <https://reutersinstitute.politics.ox.ac.uk/infodemic-how-people-six-countries-access-and-rate-news-and-information-about-coronavirus>

361 <https://www.mandalaediciones.com/autores/palacios--rafael.asp>

362 <https://worldfreedomforum.es/ponentes/mesa-divulgadores-escriitores-artistas/rafael-palacios-rafapal/>

363 <https://telegram.me/s/rafapalreal>

364 <https://www.codastory.com/disinformation/spain-telegram-Covid19-disinformation/>

365 <https://www.codastory.com/disinformation/spain-telegram-Covid19-disinformation/>

366 https://www.eldiario.es/tecnologia/conspiracion-gobierno-coronavirus-organizado-cacerolada_1_1220976.html

367 <https://www.opendemocracy.net/en/can-europe-make-it/coronavirus-fake-news-and-future-spanish-left/>

368 <https://ipi.media/journalists-operate-in-increasingly-suffocating-atmosphere-in-spain/>

369 https://english.elpais.com/science_tech/2020-11-16/just-24-of-spaniards-would-get-Covid-vaccine-as-soon-as-possible-says-new-poll.html

370 <https://english.elpais.com/society/2021-09-28/spain-nears-its-vaccination-limit-almost-90-of-target-population-have-had-at-least-one-Covid-19-shot.html>

according to an investigation by the Centre of Sociological Investigations (CIS).³⁷¹ This concern grew by the large amount of disinformation in the Spanish media about immigrants and the large number of migrants entering the country (around 750,000 in 2019³⁷²). An example of such disinformation can be found in a video of young Arab migrants showing them entering Spain and speaking in Arabic with threats such as "We are going to cut the throats of all Spaniards". It was later found that erroneous translations were used to promote hate towards them, when in reality they were singing a song.³⁷³ Such false stories were flagged by Maldita.es, which identified 321 disinformation items between 2017 and 2020 related to migration and religion.³⁷⁴

Another common tactic is to blame migrants for assaults and presenting them as a threat to the local population. These accusations, even though sometimes true, they are often part of disinformation campaigns. In 2016, there was a story, which became popular in social media, that some people assaulted a woman in Manresa. Even though the story was true, several of the details reported were either inflamed or untrue. For example, initially it was said that the assailants were of African origin, but later on it was discovered that they were Spanish, Cuban and one was from Argentina.³⁷⁵ Sometimes similar stories circulating in Spain did not even occur in Spain.

During the 2019 electoral campaign, disinformation about migrants was weaponized. A report focusing on messaging app WhatsApp showed that 14% of stories were anti-migrant and a further 25% contained racist and hateful content.³⁷⁶ Although the sources of disinformation could not be identified, during the same period WhatsApp banned three Spanish far-right networks spreading anti-migrant, anti-Muslim and homophobic content.³⁷⁷

Immigration issues were also used by right-wing parties, such as Vox, to make untrue or mostly untrue statements with the goal to degrade relevant governmental decisions. For example, Vox stated in 2021 that Spain was the main European entrance for illegal immigrants, something that is mostly false as found by EUfactcheck.³⁷⁸

With these tactics, by increasing fears, promoting xenophobia and nationalism, Vox managed to become one of the leaders in terms social media followers.³⁷⁹ In their study, Carr et al. present false statements that Vox representatives made during the election campaign in 2018, such as "Moroccans, Romanians and Colombians are already half of prisoners in Spanish prison," which was published in Mediterraneo digital in 2018.³⁸⁰

Climate change disinformation

Climate change is an issue that Spaniards are generally aware about. According to a study conducted by the Pew Research Center, more than 80% of Spaniards are concerned that climate change will harm them personally during their lifetime. Adding to this, at least 90% are willing to make some changes to help reduce the effects of the phenomenon.³⁸¹

Regardless of the high awareness among people in Spain, Spain also faced disinformation on climate change in the form of denialism. This denialism was present in the Spanish press based on research by Dominguez et al. that reviewed articles published in the Spanish newspapers El País, El Mundo and ABC in the years 2007 and 2014. The research found that seven years later (2014) denialism was reduced.³⁸² The right-wing party Vox became well known for their stance as climate change deniers in the past.³⁸³ Nevertheless, during the recent years they reconsidered their stance and they do accept the scientific evidence of climate change.³⁸⁴



Figure 15 - Article on how Vox is not denying climate change³⁸⁵

371 http://www.cis.es/cis/export/sites/default/-Archivos/Indicadores/documentos_html/TresProblemas.html

372 <https://elpais.com/espana/2020-06-08/la-ilegada-de-inmigrantes-mantiene-el-crecimiento-de-la-poblacion.html>

373 https://www.eldiario.es/desalambre/videos-personas-hablando-arabe-difunden-mensajes-falsos-atacarles_1_6743171.html

374 <https://migracion.maldita.es/bulos/1>

375 <https://www.theatlantic.com/international/archive/2019/09/fake-news-feeds-anti-migrant-sentiment-spain/598429/>

376 https://avaazimages.avaaz.org/Avaaz_SpanishWhatsApp_FINAL.pdf

377 <https://www.euractiv.com/section/digital/news/as-election-looms-spaniards-are-hit-by-whatsapp-disinformation-campaign/>

378 <https://eufactcheck.eu/factcheck/mostly-false-spanish-government-pull-effect-makes-spain-the-main-european-entrance-of-illegal-immigrants/>

379 https://elpais.com/politica/2018/12/12/actualidad/1544624671_005462.html

380 <https://d-nb.info/1198966378/34>

381 <https://www.pewresearch.org/global/2021/09/14/in-response-to-climate-change-citizens-in-advanced-economies-are-willing-to-alter-how-they-live-and-work/>

382 Domínguez, M., Lafita, Í., & Mateu, A. (2017). Taking climate change seriously: An analysis of op-ed articles in Spanish press. *Public understanding of science*, 26(7), 861-871

383 <https://newrepublic.com/article/155669/far-right-climate-denial-growing-europe>

384 <https://www.opendemocracy.net/en/europe-make-it/spains-vox-party-and-the-threat-of-international-environmental-populism/>

385 <https://www.lavanguardia.com/vida/20191205/472063891541/vox-no-niega-el-cambio-climatico-pero-si-el-totalitarismo-de-la-religion-climatica.html>

SUMMARY

In this section, we presented some general findings regarding disinformation campaigns involving political actors, parties, interests and propaganda in five EU countries (i.e. Greece, Germany, France, Spain, and Italy), focusing on three salient issues of political debate in European politics: i) Covid-19 pandemic, ii) Immigration, and iii) Climate Change.

Although generalizations should be avoided, there are some notable trends worth mentioning. Our study showed, that disinformation targeted against EU citizens is linked to both foreign sources (i.e., Chinese, alt-right American, and Russian) and domestic media and actors. It was not always possible to directly identify the actors that were responsible for the disinformation campaigns that were included in the study. In such cases, we presented information regarding the political forces that would possibly benefit or get damaged/hurt the most, relying on relevant studies and literature.

In general, there was evidence that some disinformation campaigns and fake news spread online and in social media platforms are directly or indirectly associated with far-right or right-wing political actors, populist parties, and extremist groups. As expected, the spread of disinformation is highly related to the topics of the political debate in each country, especially during the electoral periods. In the following, we present the main conclusions that can be drawn for each of the three disinformation topics, summarising the research findings in the five selected countries.

Covid-19 is an issue that is currently in the centre of news worldwide. Everyone is concerned about it and tries to be as informed as possible on relevant topics, like vaccines, self-protection measures, measures taken by the government, etc. This gives an opportunity to anyone, from political actors, to scientists and citizens, to spread disinformation along with factual news, in order to serve personal interests or even to bring chaos and fear. Based on the research conducted for the five countries of interest, we summarize below the most common findings about Covid-19 disinformation:

- Conspiracy theories regarding the origin of the virus, remedies, vaccines, medicine and more were common in all countries³⁸⁶ and not necessarily related to politics.
- On a national level, disinformation originates more often by right wing parties and politicians and mostly concerns the current government and their decisions.
- Disinformation was also generated by Russia and China and it mostly aims to undermine the EU and its effectiveness when responding to Covid-19. The

countries mostly targeted by these campaigns were Germany and Italy.

- The most common means used to spread disinformation are social media, but in countries like Germany and Spain, messaging apps are dominating.
- Disinformation in social media for non-English speaking countries (e.g., France, Spain) was harder to tackle by the platforms such as Facebook due to language limitations.

Disinformation against immigrants, refugees or minority groups is widely spread in all the countries in question, mainly due to the refugee crisis. This kind of disinformation is based on pre-existing stereotypes, anti-immigrant sentiments, racist attitudes and xenophobia. Anti-immigrant disinformation has an adverse impact on tolerance and solidarity, and it can contribute to a climate of hostility, encouraging hate speech and even hate crime. As mentioned above, disinformation narratives present immigrants or minorities as a threat to European culture and identity, an economic threat, a criminal threat or a health threat. However, in many cases we observed an overlapping in anti-immigrant disinformation narratives which are presented below:

- Anti-immigrant disinformation focuses on the economic threat of immigrants and minorities, in terms of welfare state and public services expenses, especially in France and Germany. Immigrants are also illustrated as criminals (e.g. Spain, Germany). Finally, disinformation has increased during the pandemic, presenting migrants and minorities as a threat to public health. The most relevant examples were found in Italy, the country suffering the most during the first wave of the pandemic, and Germany.
- Anti-refugee disinformation is widely spread, especially in Greece, but also in Germany, France and Italy. All of the above countries were the main recipients of major migration flows from the Syrian refugee crisis.
- Anti-Muslim disinformation is frequent in many countries in question, especially Germany, France and Italy, with the first two also having considerable Muslim populations (5-7%). This is highly related to the “Islamisation” narrative, where Muslims are portrayed as a threat to European or national identity and culture.
- Roma communities are targeted in disinformation campaigns. Relevant examples of disinformation were observed specifically in France and Italy.
- In all the countries of the study, disinformation against immigrants and minorities is mostly associated with local far-right parties or extreme-right media as the disinformation propagators and in some

³⁸⁶ <https://CovidinfodemicEurope.com/#graphics>

cases even with mainstream right-wing parties.

- There are examples of pro-Kremlin media amplifying the messages of far-right politicians (e.g. in Germany). However, it is worth mentioning that this finding does not imply any kind of cooperation or coordination between them; it might be a case of aligning interests, or sometimes 'malicious foreign actors may simply use far-right politicians' messages in favour of their own agenda.³⁸⁷

In Europe, 93% of Europeans consider climate change a serious problem.³⁸⁸ The Paris Agreement confirms the need for action, common strategy, and measures against global warming and climate change. In our research, the amount of information and sources collected regarding disinformation on climate change was limited, which may be an indicator of the fact that most Europeans believe in climate change and understand the devastating effects it may have on their life, if decisive action is not taken immediately. There were specific topics that took larger proportions in different European countries; for example,

in France an environmental topic that gets a lot of media attention are wind turbines. In between opinions and facts, false information is also circulated in the local media. In the following, we summarise the general conclusions of this research regarding disinformation and climate change in the countries of interest:

- The population is generally aware of climate change issues and they are concerned of the effects it will have on their lives; therefore, related disinformation is somewhat limited since there is not an audience susceptible or very open to it.
- Disinformation mostly regards denying the existence of the issue and the fact that it is anthropogenic rather than promoting false information on the issue itself.
- In the past years, denialism was more common especially among right wing parties, but currently they turn towards scepticism and they oppose the measures suggested towards tackling climate change nationally and on a European level.

387 [https://www.europarl.europa.eu/RegData/etudes/IDAN/2021/653641/EXPO_IDA\(2021\)653641_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2021/653641/EXPO_IDA(2021)653641_EN.pdf)

388 https://ec.europa.eu/clima/citizens/citizen-support-climate-action_en

POLICY RECOMMENDATIONS

THE DISINFORMATION ECOSYSTEM

Disinformation is a complex issue that cannot be effectively addressed with monolithic solutions. What is required is a set of complementary policies that will try to tackle the different political, social and media issues connected with the root causes of this problem. The development of digital platforms, the explosion of social media, and the breakthroughs in ICT technologies have undoubtedly facilitated disinformation creation and spread but are not the sole reason behind it. The disinformation ecosystem constitutes an environment that also involves news media and journalists, political actors, business and economic interests, civil society stakeholders but also the citizens themselves, caught willingly or unwillingly in it.

The 2018 report of the High Level Group (HLEG) on fake news and online disinformation³⁸⁹ tries to decode the disinformation ecosystem in the EU by identifying four main players involved in this problem, which is connected to ‘wider political, social, civic and media issues’:

Political actors

Political actors, including foreign governments but also European politicians and authorities, can peddle disinformation. Most recently, Russia and China have been accused by the EU of systematically seeking to undermine trust in Western Covid-19 vaccines and erode trust in the EU coronavirus strategy.³⁹⁰ Foreign electoral

interference and disinformation in national and European democratic processes has been a serious problem for many years as the relevant October 2019 European Parliament resolution of recognized.^{391,392} Furthermore, there are domestic politicians and public authorities that do not respect freedom of the press and seek to control what media outlets (private and public service) publish or talk about. For example, the European Parliament recently discussed attempts by Polish, Hungarian and Slovenian authorities to silence independent media.^{393,394} In an open letter, 22 editors of major Slovenian media revealed that they “are subjected to direct lying, insinuations, manipulation and insults from those in power, starting with the top of the government.”³⁹⁵ Similarly, in a scathing report published in March 2021, the Council of Europe Commissioner for Human Rights warned that “the combined effects of a politically controlled media regulatory authority and distortionary state intervention in the media market have eroded media pluralism and freedom of expression in Hungary.”³⁹⁶ This behaviour results in weakening the trust of many European citizens towards public authorities, politicians and democratic processes.³⁹⁷ A recent survey by the Reuters Institute³⁹⁸ found that citizens were mostly concerned about the behaviour of national politicians when it came to spreading misleading information about Covid-19, especially in countries of Central and Eastern Europe (Czech Republic, Slovakia, Hungary, Romania, and Bulgaria) where the misinformation was widespread.

389 “A multi-dimensional approach to disinformation - Report of the independent High level Group on fake news and online disinformation”, <https://digital-strategy.ec.europa.eu/en/library/final-report-high-level-expert-group-fake-news-and-online-disinformation>

390 <https://www.dw.com/en/eu-accuses-russia-china-of-Covid-vaccine-disinformation/a-57367812>

391 https://www.europarl.europa.eu/doceo/document/TA-9-2019-0031_EN.html

392 <https://carnegieendowment.org/2020/08/18/european-lessons-for-tackling-election-interference-pub-82561>

393 <https://www.europarl.europa.eu/news/en/agenda/briefing/2021-03-08/6/media-freedom-under-attack-in-poland-hungary-and-slovenia>

394 <https://jipi.media/european-union-must-act-on-media-freedom-in-poland-hungary-and-slovenia/>

395 <https://www.ecpmf.eu/22-slovene-editors-write-joint-public-letter>, October 2020

396 <https://www.coe.int/en/web/commissioner/-/it-is-high-time-for-hungary-to-restore-journalistic-and-media-freedoms>

397 [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/653635/EXPO_STU\(2021\)653635_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/653635/EXPO_STU(2021)653635_EN.pdf)

398 https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2021-06/Digital_News_Report_2021_FINAL.pdf

News media

Several news media contribute to disinformation either by willingly promoting fake news or propaganda to serve or please economic and political interests, or by failing to adopt rigorous policies and tools for fact-checking, often being held hostage to ratings and the pressure for fast news production.^{399,400} In Italy, the leader of the political party Forza Italia Silvio Berlusconi and his family remain in control of Mediaset, the country's largest commercial broadcaster. British tabloids may have significantly contributed in helping swing UK voters towards Brexit⁴⁰¹ by publishing fake stories against the EU, focusing on hot-topics like migrants⁴⁰² and taxes.⁴⁰³ Many newsrooms on the other hand struggle to keep up with fact-checking, overwhelmed by the huge volume of fake news, especially in light of the pandemic.⁴⁰⁴ In addition to cases of fake news promotion that are deliberate or a result of not-so-rigorous fact-checking, there is also another interesting aspect to the role of traditional media with regard to disinformation dissemination. While studies indicate that the reach of fake news websites is very limited,⁴⁰⁵ data also shows that the wider public hears about fake news stories through mainstream media. As explained in a recent study,⁴⁰⁶ mainstream media routinely cover fake news, feeling compelled to correct or debunk them but also because many of these stories are "designed to fit important criteria of newsworthiness". This 'paradoxical role' of mainstream media may significantly contribute to the dissemination of fake news since the audience seems in many cases to "internalize the wrong information or at least become less certain regarding the truth" through its constant exposure to the reporting of such fake news. It is obvious that supporting and strengthening the role of professional and independent media that adhere to established ethical codes of conduct is of outmost importance for combating disinformation and increasing citizen resilience.

Citizens and civil society

Citizens and civil society are also key players when it comes to disinformation.³⁸⁹ Citizens may individually or collectively share false content (mainly through their

social media accounts and online presence),⁷ especially in societies that are divided or polarized over important political and social issues⁴⁰⁷ where promoting partisan viewpoints may easily extend to dissemination of propaganda and conspiracy theories. Civil society organisations, on the other hand, can play an important role in combating disinformation in the form of independent fact-checking organisations, independent journalism outlets, initiatives for media literacy training of citizens and training of journalists, and disinformation awareness campaigns for the public, among others.

Digital media

Digital media, including large platforms like Twitter, Facebook, Reddit, YouTube and messaging apps like WhatsApp, Snapchat and TikTok but also online news sites, play a pivotal role in disinformation creation and spread, a role that in many cases is not yet fully explored or decoded. Citizens around the world are increasingly getting their news from digital platforms and messaging apps instead of traditional media, a trend that is stronger among younger people and those with lower levels of education. Over the last decade, data has shown that online news (incl. social media) was increasing their share as the most frequently used source of information while TV and particularly the print press showed significant decline.⁴⁰⁸ In 2020, online news became the main source to access the news in many European countries, with TV following,⁴⁰⁹ although the pandemic changed a bit the trend, at least temporary, in favour of TV, presumably because many people turned to trusted sources and public service media for more accurate information.⁴¹⁰ In the bigger picture though, the trend clearly favours digital media and especially established and rising social media platforms. This landscape puts enormous power in the hands of platforms "that are becoming increasingly important as both enablers and gatekeepers of information".³⁸⁹ Platforms may contribute decisively in empowering and shaping well-informed citizens by allowing them to form their views through easy access to a wealth of different sources and by enabling them to express themselves in new creative ways. At the same time however, the large-scale processing capabilities of

399 <http://polecom.org/index.php/polecom/article/viewFile/74/264>

400 Bennett WL, Livingston S. (2018) The disinformation order: Disruptive communication and the decline of democratic institutions. *European Journal of Communication* 33(2), 122-139. doi:10.1177/0267323118760317

401 <https://www.theguardian.com/media/2016/jun/24/mail-sun-uk-brexite-newspapers>

402 <https://www.theguardian.com/media/2016/jun/17/daily-mail-publishes-correction-story-migrants-from-europe>

403 <https://wayback.archive-it.org/11980/20191016212732/https://blogs.ec.europa.eu/ECintheUK/express-eu-2600-tax-bombshell-story-completely-wrong/>

404 <https://www.politico.eu/article/coronavirus-fake-news-fact-checkers-google-facebook-germany-spain-bosnia-brazil-united-states/>

405 <https://reutersinstitute.politics.ox.ac.uk/our-research/measuring-reach-fake-news-and-online-disinformation-europe>

406 Tsfati, Y., Boomgaarden, H., Strömbäck, J., Vliegenthart, R., Damstra, A. & Lindgren, E. (2020) Causes and consequences of mainstream media dissemination of fake news: literature review and synthesis. *Annals of the International Communication Association* 44. 157 - 173. <https://doi.org/10.1080/23808985.2020.1759443>

407 <https://www.brookings.edu/techstream/how-partisan-polarization-drives-the-spread-of-fake-news/>

408 https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf

409 <https://www.statista.com/statistics/422687/news-sources-in-european-countries/>

410 https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf

such platforms, enabled also by the rise of AI and the development of tools for online behaviour monitoring and analysis, provide a fertile ground for the mass production and wide dissemination of disinformation. Platforms can no longer pretend that they are merely the enablers of information exchange. They also have the responsibility to make sure that the services and tools they freely offer are not used to the detriment of citizens, society and democracy.

This snapshot of the disinformation ecosystem paints the image of a complex and evolving landscape, which necessitates policies and interventions that take into consideration the roles and capabilities of the different actors as well as the impact that they may have in amplifying or combating this phenomenon. Europe and the world face increasing risks by disinformation, threatening the very fabric of our society and democratic institutions. The response of the EU cannot be fragmented, short-sighted, one-dimensional, simplistic, monolithic, or lukewarm. It should also not be solely restrictive, regulatory, or dictated and reinforced by Brussels. Decisive multidimensional action that involves collaboration of all relevant stakeholders and respects fundamental EU values such as the freedom of speech, media pluralism and media freedom is what is necessary to strengthen our defence against disinformation and increase the resilience of citizens. The first step towards setting and updating these policies should be a thorough understanding of the nature and scale of the problem that can only be achieved by close monitoring of the evolving technologies and strategies used for disinformation.

POLICY RECOMMENDATION FRAMEWORKS FOR COMBATING DISINFORMATION

To address the issue of disinformation in Europe, several studies have been undertaken and a variety of proposals have been made during the past few years, initiated by EC institutions. In the following, we briefly present the main policy recommendations from the most important of these efforts. We also present some guidelines and recommendations by international organisations like the OECD, the UN and UNESCO.

Report of the independent HLEG on “Fake news and online disinformation”

In January 2018, the EC set up a high-level expert group (HLEG) to advise on policy initiatives and help develop a comprehensive EU strategy for tackling online disinformation.⁴¹¹ HLEG comprised of 39 members with a wide range of expertise, including representatives from social media and online media platforms, civil society

organisations, media, journalists and academia, and public sector from different Member States. The main deliverable of the HLEG was a report submitted in March 2018³⁸⁹ that identifies the roles and responsibilities of various stakeholders and formulates recommendations for tackling disinformation. The HLEG proposes a “multi-dimensional approach based on a number of interconnected and mutually reinforcing responses”. The recommendations aim to provide short-term responses to most pressing problems and long-term responses to strengthen resilience to disinformation. The proposed framework includes five intervention areas, as described below.

1. Transparency

Transparency of the digital media ecosystem is key in addressing disinformation since it enhances the citizens’ capability to effectively assess the veracity of news and understand how news is disseminated, including who and why makes information available. Three aspects of transparency highlighted by the report have to do with:

- **funding sources:** Digital media and platforms should make clear who provides the information in each instance while sponsored content should be clearly identifiable as well as the use of paid human influencers or robots to promote messages.
- **online news sources and journalistic processes:** Indicators for source transparency should be created with respect to the identity of the source, ownership, journalistic processes followed (e.g. codes of ethical conduct, etc.), whether the source retracts incorrect stories, etc. By including such “nutritional labels” next to online content, citizens will be able to assess its trustworthiness. In addition, platforms should provide more information on their algorithms and the way they rank and propose content while they should inform in due time about changes in algorithms.
- **fact-checking and verification practices:** Increased collaboration is needed between fact-checkers, and newsrooms in the EU to improve their operation and efficiency, keep up-to-date with new advances in disinformation, and create an open market for fact checking. European Centres for interdisciplinary and independent research on disinformation should be funded by national research bodies to monitor new technologies, tools and impact of disinformation and develop tools and means for combating it. Platforms should provide privacy-compliant access to their data to allow in-depth study of the phenomenon by academia and civil society.

⁴¹¹ <https://digital-strategy.ec.europa.eu/en/news/commission-appoints-members-high-level-expert-group-fake-news-and-online-disinformation>

2. Media and information literacy

This is essential for allowing citizens of all ages to efficiently navigate the digital media environment and participate responsibly in the public sphere. The report proposes improving media literacy along two axes:

- **reassessment and adjustment of educational policies:** EU should make a priority to include media and information literacy in national school curricula, while teaching such courses should be considered in school rankings like OECD's PISA. Similar training programmes should be mandated for teachers and funded by programs like Erasmus.
- **media and information literacy programmes for citizens of all ages:** European initiatives for media literacy programmes for citizens of all ages and demographics should be adopted based on existing best practices and models for younger people like the Safer Internet Centres. In addition, the EC should support regional media literacy initiatives as well as regular reporting on this matter by Member States.

3. Empowerment of users and journalists

Increasing the users' control over the platform content they are exposed to but also supporting journalists in mastering new technologies that will allow them to verify online content are considered essential in the society's resilience to disinformation. The report proposes the following actions to empower users and journalists:

- **Empowerment of users:** Platforms should consider developing appropriate interfaces (browser plugins and smartphone apps) that will increase the control of users over the selection of the content presented in their feeds or search results, while recommendation systems that present different sources and points of view should also be made available.
- **Empowerment of journalists:** Newsrooms should invest in professional tools for automatic audiovisual and text content verification, source checking as well as in the creation of inter-disciplinary fact-checking teams for disinformation identification. Training of journalists in technologies and tools for identifying disinformation should also be examined along with funding for media innovation projects.

4. Diversity and sustainability of news media ecosystem

Having an independent and diverse media ecosystem is essential for democracy, while ensuring sustainability is crucial for high-quality journalism. The report offers recommendations on these fronts at two levels:

- **Europe:** European public authorities should support media pluralism by protecting the freedom of

expression and press and by supporting private media and independent journalism. The EC should consider funding quality journalism either directly through pan-European journalistic projects or via some type of tax breaks. The EU should also invest in media-related research and innovation actions aiming to improve technologies for advanced media services.

- **Member states:** National authorities and regulatory bodies should refrain from interfering with media independence. At the same time, Member States should rapidly implement the 2016 Council of Europe Recommendation on the Protection of Journalism. Legal approaches that may result in any kind of censorship should be avoided, while public support in the form of State Aid should be carefully considered and only applied via transparent processes that respect free press and free competition.

5. Process and evaluation

To ensure that the actions presented above can efficiently address disinformation in Europe, the HLEG report proposed a self-regulatory multi-stakeholder approach for the development and promotion of a **European Code of Practices to counter disinformation**. The intent of the Code is to “promote an enabling environment for freedom of expression by fostering the transparency and intelligibility of different types of digital information channels”. The report set out the process for the elaboration, implementation, monitoring and assessment of this Code by a coalition of relevant actors. It also provided 10 Key Principles to be considered in the Code, related to the role and obligations of platforms in combating disinformation. Finally, it underlined the need for coordination with European Centres for Research on Disinformation.

Based on the framework set out in the HLEG report, a Coalition of stakeholders, including online platforms, news media organisations, journalists, publishers, independent content creators, the advertising industry, fact-checkers etc. formulated the Code of Practice, which was already discussed in Chapter 2. The Code that became effective in October 2018 was the first worldwide instance where media industry stakeholders agreed to self-regulatory standards to fight disinformation. It is based on the 10 principles of the HLEG report and sets a set of commitments that signatories voluntarily agree to comply, ranging from “transparency in political advertising to the closure of fake accounts and demonetization of purveyors of disinformation.”⁴¹²

The European Court of Auditors published in May 2021 a report⁴¹³ on the EU action plan against disinformation, concluding that “the code of practice fell short of its goal

⁴¹² <https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>

⁴¹³ <https://op.europa.eu/en/publication-detail/-/publication/e166653a-c72a-11eb-a925-01aa75ed71a1/language-en/format-PDF/source-218929381>

of holding online platforms accountable for their actions and their role in actively tackling disinformation.” In May 2021, the European Commission also acknowledging the shortcomings of the code of practice issued through a communication⁴¹⁴ a guidance to strengthen this code, which is now expected to be taken up to propose the new code of practice. This calls for action on:

- Larger participation of stakeholders with tailored commitments;
- Better demonetisation of disinformation;
- Ensuring the integrity of platform services;
- Improving the empowerment of users;
- Increasing the coverage of fact-checking and providing increased access to data to researchers;
- Creating a more robust framework for monitoring compliance of signatories based on KPIs.

Report of the European Policy Centre on “Disinformation and democracy: The home front in the information war”

A paper focusing on the impact of disinformation to European democratic processes was published in 2019 by the European Policy Centre.⁴¹⁵ This discusses existing disinformation measures undertaken by different stakeholders (platforms, civil society, EU and European governments) and their challenges and offers a list of recommendations on what the different stakeholders must do to address this problem and protect European democracy. The recommendations are set out along three dimensions: EU and Member States, media platforms and private sector, and finally, citizens and civil society, as summarized below.

1. EU and Member States

The EU should focus on creating a supporting environment in which other actors can cooperate to develop the “societal infrastructure needed to resist disinformation”. More specifically:

- The main weakness of the current European Code of Practice is that it is voluntary. The option of regulatory measures and consequences should be open, in case signatories drop out or disregard commitments.
- The Code should be widely advertised so that signatories are held accountable by public opinion. In addition, the reports provided by signatories with regard to their compliance with the Code should also be made public and regular independent evaluations of how they are doing should be issued.
- The Code of Practice should take precedence over security sector actions like the EUvsDisinfo.eu service

to make sure disinformation fight remains in the civil space. In this vein, the role of EUvsDisinfo.eu should be reconsidered and the service should be ideally rebranded to provide domestic briefs.

- The EU should support private sector actors that adhere to high-quality information standards by creating and maintaining an advertising blacklist of suspicious sites, thus providing financial incentives to publish high-quality content.
- National governments should tread carefully when legislating against disinformation and leave it to the courts to decide what is disinformation.
- The EC should create a European mechanism to monitor member state initiatives with regard to disinformation and make sure they respect freedom of the press and do not engage in censorship.
- Regular opinion polling should be adopted (as part of Eurobarometer surveys) to monitor public trust and opinions on disinformation. This will help evaluate the effectiveness of policies and shape awareness campaigns.
- Member states should increase their efforts to involve citizens in European politics, e.g. via consultations, in order to fight disinformation that finds fertile soil in Euroscepticism.

2. Social media platforms and private sector

The authors of the report argue that assigning the sole responsibility of disinformation to platforms will increase their power over users and affect smaller platforms with limited resources disproportionately. However, there are specific actions to be undertaken by platforms towards addressing the problem:

- Social media platforms should voluntarily share more of their data and information about their algorithms with experts and researchers to advance scientific knowledge with regard to disinformation spread and shaping of views in the online environment.
- The EC should consider legislation to mandate open access to platform data in case platforms do not agree to voluntarily provide it. This would transform the current business model and bring some much needed balance in the relationship between tech giants and their users through a new ‘social contract’.⁴¹⁶
- Platforms should be careful with their experiments of user experience (e.g. changing algorithms for news feeds) in local media ecosystems. These should be done in consultation with other stakeholders, preferably in the framework of the Code of Practice Coalition. In the same vein, they should not test new

414 <https://digital-strategy.ec.europa.eu/en/library/guidance-strengthening-code-practice-disinformation>

415 <https://www.epc.eu/en/publications/Disinformation-and-democracy-The-home-front-in-the-information-war~21c294>

416 “Let’s make private data into a public good”: <https://www.technologyreview.com/2018/06/27/141776/lets-make-private-data-into-a-public-good/>

features in individual markets but rather adopt random selection of users across Europe.

- Mainstream news media should honour their responsibility to be fair, promote the truth and avoid partisanship. They should insist on maintaining and strengthening their good reputation and avoid murky practices such as clickbait.

3. Media consumers and civil society

Several surveys, such as the ones discussed in Chapter 2, show that European citizens overwhelmingly believe that disinformation is a major problem for democracy and recognize their own responsibility in the effort to address this phenomenon.⁴⁴ Online disinformation is probably here to stay and that citizens have a significant role to play in combating it.

- Media consumers should change the way they read news by checking and comparing sources, being sceptical about preposterous news, and exercising judgement on what and who to trust.
- The EC should focus on media literacy and launch relevant campaigns in cooperation with national governments and NGOs or even social media companies. Such campaigns should prioritise vulnerable groups and especially people who are not ‘digital natives’. Media literacy should not be restricted to schools but effort should be directed to interventions for older people as well.
- Users should realize their power. They should express their dissatisfaction with whether/how platforms address disinformation by using alternatives. If there is high demand, platforms will change or new ones will emerge.

Report of Council of Europe on “Information Disorder: Toward an interdisciplinary framework for research and policy making”

A report on disinformation was published by the Council of Europe in 2017.⁴¹⁷ It proposed a new conceptual framework for “information disorder”, including three types (dis-, mis- and mal-information), three phases (creation, production, distribution) and three elements (agent, message, interpreter). It also discussed the phenomenon of filter bubbles and echo chambers and how they amplify information disorder. A key message of the report is that “we need to understand the ritualistic function of communication”. Communication is not just transmission of information but also ‘drama’⁴¹⁸ that plays into people’s emotions and is used to “represent shared beliefs”. Simply putting more factual information online will not solve the issue; what is needed are “formats for

sparking curiosity and scepticism in audiences about the information they consume and the sources from which that information comes”.

The authors propose 34 recommendations on what different stakeholders could do to address the problem, which are summarized below.

1. Technology companies (platforms)

Technology companies should increase transparency and invest in fact-checking, content moderation, and content diversity. More specifically, they could:

- Create an independent international advisory council from a variety of disciplines to provide guidance in dealing with disinformation.
- Provide data related to attempts for improving quality of information (e.g. tags) to researchers to allow them to better evaluate proposed solutions.
- Be transparent about algorithmic changes that down-rank or remove content.
- Collaborate with other platforms to fight information disorder, e.g. by sharing data.
- Provide contextual metadata (e.g. when a website was created, or when an image was first published) and visual indicators to help users assess the veracity of online content.
- Eliminate financial incentives for disinformation dissemination.
- Take stronger action against automated accounts that boost content.
- Moderate content in different languages adequately.
- Invest in identifying fabricated audiovisual content.
- Provide increased access to audiovisual metadata to trusted partners to help them identify fake content.
- Build tools for fact-checking and content verification for the public.
- Build ‘authenticity engines’ to allow original material to be surfaced and trusted.
- Build solutions to minimize filter bubbles, including customization of user feed and search algorithm, content diversification, and private consumption of information. Also, adopt a more neutral terminology, e.g. ‘connect’ instead of ‘follow’ or ‘friend’, ‘bookmark a story’ instead of ‘like’ or ‘dislike’.

2. Media Organisations

Media organizations should adhere to codes of ethical conduct, debunk fake content and sources, and inform the audience about the threat of disinformation. More specifically, they could:

- Collaborate with fact checking organizations to debunk disinformation, avoiding duplication of effort

417 <https://rm.coe.int/information-disorder-toward-an-interdisciplinary-framework-for-research/168076277c>

418 Carey, J. (1989), *Communication as Culture: Essays on Media and Society*, London: Routledge.

and allowing journalists to focus on the news.

- Agree on best practices on strategic silence to avoid boosting disinformation.
- Adhere to strong ethical codes of conduct.
- Debunk sources, not only content.
- Produce features to teach audience how to be critical of content and explain the verification process followed for debunking.
- Educate the audience through stories on the threats posed by disinformation to democratic principles, institutions and society.
- Improve quality of headlines, avoiding clickbait.
- Improve standards for publishing content sourced from the web to avoid disinformation dissemination.

3. National governments

Governments should create a supportive environment to combat disinformation through regulatory action but also by supporting public service and local media. More specifically, they could:

- Commission studies to map the information disorder landscape in the country. The same methodology should be used for all European countries to be able to compare them accurately and fairly.
- Regulate online advertising networks to make disinformation unprofitable.
- Demand transparency about Facebook ads to increase accountability.
- Support public service media and local news.
- Roll out cyber-security training for government staff.
- Enforce the appearance of minimum level of public service news in platforms through cooperation with independent public media.

4. Education ministries

Education ministries should lead the effort for media literacy of citizens of all ages. They could:

- Create an international news literacy curriculum for all ages that will cover a range of issues regarding disinformation, skills to combat it and education on psychological, social and technical aspects.
- Collaborate with libraries to teach skills for navigating the digital environment.
- Update the curricula of journalism schools to equip future journalists with knowledge and skills to detect disinformation and report on it.

5. Civil society

Civil society should:

- Educate the public about disinformation (techniques, tools, risk to society and democracy).

- Act as honest brokers of collaboration among various stakeholders in the fight against disinformation.

6. Funding bodies

Funding bodies like the EC through its Horizon Europe program and other similar programs should support the development of tools against disinformation as well as initiatives for media and information literacy.

- Provide support for testing the efficiency of different solutions before further investing in them, e.g. through grants to multi-partner research groups.
- Provide support for the development of open technological solutions, e.g. by funding smaller start-ups for innovative solutions.
- Support media literacy programs by funding journalistic initiatives that help audiences to navigate the online world and teach fact-checking skills.

European Commission Communication on the “European democracy action plan”

The Democracy Action Plan⁴¹⁹ was proposed in December 2020 to strengthen the resilience of EU democracies and empower EU citizens in the face of challenges arising from the transformation of the digital environment. It sets out an EU policy framework and relevant measures around three pillars: promotion of free and fair elections and strong democratic participation, support for free media and pluralism, and countering disinformation. The proposed measures are centred on “individual rights and freedoms, transparency and accountability”.

1. Protecting election integrity and promoting democratic participation

The report proposes several actions to protect elections and increase citizen participation. In the following, we focus on those proposals that can directly or indirectly contribute to addressing disinformation.

- **Increase transparency of political advertising and communication:** The EC will propose legislation to ensure enhanced transparency of sponsored political content, clarifying the responsibilities of sponsors and distribution channels (platforms, advertisers, political consultancies). It will enable monitoring and enforcing rules and consider restrictions to micro-targeting and psychological profiling. The legislation will be complemented by support measures and guidance for political parties and Member States.
- **Strengthen cooperation to ensure free and fair elections.** The EC will facilitate cooperation among Member States and international organizations to exchange best practices on tackling foreign interference and disinformation in elections.

⁴¹⁹ https://ec.europa.eu/info/strategy/priorities-2019-2024/new-push-european-democracy/european-democracy-action-plan_en

2. Strengthening media freedom and pluralism

Free and pluralistic media are essential to democracy. By providing citizens with reliable information, they can play a big role in fighting disinformation. The report proposes several actions to support the free press (e.g. addressing journalists' safety), among which several that are relevant to fighting disinformation:

- **Fight abusive use of SLAPPs.** Strategic lawsuits against public participation (SLAPPs) are exaggerated lawsuits that aim to censor or silence critics by burdening them with the cost of a legal defence and are typically launched against those with a watchdog role such as journalists, activists, or civil society organisations.⁴²⁰ SLAPPs can seriously damage the reputation of individuals and limit the freedom of press and of expression, thus the EC should create an initiative to protect journalists and civil society against SLAPPs.
- **Cooperation to develop and implement professional journalistic standards.** The EC should promote strong collaboration between national media councils, media self-regulatory bodies, independent media regulators and networks of journalists aiming to foster EU-wide journalistic standards and fund media partnerships for training professionals and sharing best practices.
- **Support media pluralism.** The EC should take further action to enhance transparency of media ownership by funding the new Media Ownership Monitor, a pilot project setting up a public database with relevant information on media outlets. It should also enforce transparent rules and fair criteria for allocating state aid and advertising to media (e.g. by making this information public) to avoid indirect political pressure on newsrooms.

3. Countering disinformation

Disinformation can pose a direct threat to democracy by manipulating public opinion, discouraging participation in elections, and cast doubt on democratic institutions and government. The report proposes actions to increase transparency, reduce economic incentives, and enforce accountability. More specifically, these actions aim to:

- **Improve EU and Member State capacity to counter disinformation.** The EU should strengthen internal cooperation between different institutions to combat disinformation and develop a clear protocol to quickly respond to specific situations. It should also foster closer collaboration with relevant stakeholders and international partners to monitor foreign interference

and threats. In the same vein, the EC should develop its own toolbox for countering foreign interference and influence operations, including new instruments that allow imposing costs/sanctions on perpetrators, and strengthening the EEAS strategic communication activities and taskforces. It should also support work on resilience against disinformation in third countries.

- **Increase obligations and accountability for online platforms.** The Code of Practice on Disinformation was a first attempt to make platforms comply with a set of rules that would help reduce disinformation. However, its voluntary nature made it in practice unenforced. The Guidance on Strengthening the Code of Practice on Disinformation that was published in May 2021⁴¹⁴ proposes a more robust approach with clear commitments for all involved stakeholders and strong oversight mechanisms.
- **Empower citizens to make informed decisions.** The EC should increase its efforts on strengthening media literacy by supporting relevant campaigns both nationally and under various EU programmes. It should support the common educational guidelines to tackle disinformation through education, also with the direct involvement of journalists. Finally, it should support civil society initiatives that promote media literacy for citizens of all ages against disinformation.

ITU/UNESCO report on “Freedom of expression and addressing disinformation on the Internet”

The report⁴²¹ by the Broadband Commission for Sustainable Development (BCSD), co-founded by UNESCO and the ITU, discusses balancing freedom of expression and the fight for reliable information in today's online environment. It introduces a novel typology with 11 types of responses to disinformation (**Figure 16**) and proposes an assessment framework for disinformation responses with 23 reference points, including impact on freedom of expression. For each of the 11 types, the authors provide in-depth analysis of relevant responses around the world developed by governments, civil society, and the private sector, discuss their challenges, and provide a list of recommendations for the different stakeholders. In total, more than 70 recommendations are set out. The report highlights the need for a multi-faceted approach and a multi-stakeholder collaboration and underlines the need for “increased transparency and proactive disclosure”.

⁴²⁰ <https://www.ecpmf.eu/ending-gag-lawsuits-in-europe-protecting-democracy-and-fundamental-rights/>

⁴²¹ ITU/UNESCO Broadband Commission research report on 'Freedom of Expression and Addressing Disinformation on the Internet' (2020): <https://www.broadbandcommission.org/publication/balancing-act-countering-digital-disinformation/>

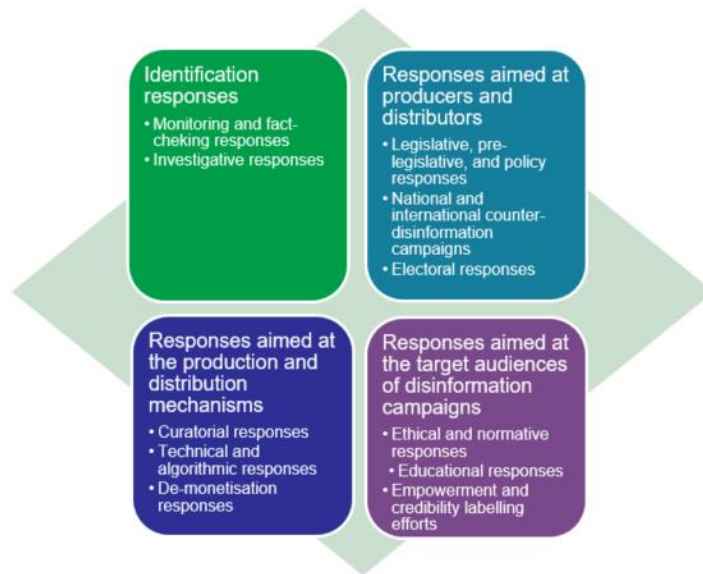


Figure 16 - Novel typology of responses against disinformation: four top-level categories and their 11 sub-categories. Source: ITU⁴²²

In the following, we present the main recommendations, per key stakeholder category.

1. Individual states (governments & institutions)

- Commit to not engage in public opinion manipulation directly or indirectly (e.g. via influence operations or dark propaganda).
- Increase transparency and proactive disclosure of official information and data and allow public access to information.
- Review responses to disinformation to make sure they are in line with human rights such as freedom of expression, privacy, freedom of the press.
- Increase transparency of political advertising through open advertising databases and disclosure of funding and spending of political parties.
- Cooperate with journalists and fact-checkers to gain knowledge on how disinformation networks work.
- Support independent, public service and local media.
- Avoid criminalising disinformation to ensure legitimate journalism and other public interest information is not affected by such laws.
- Ensure that laws against disinformation do not violate standards on freedom of expression and privacy.

2. Political parties and political actors

- Avoid disinformation tactics in political campaigns.
- Be vocal about the danger of politicians as amplifiers of disinformation and increase trust in institutions.

3. Internet communications companies (platforms)

- Increase collaboration to deal with cross-platform disinformation, improve technological abilities to detect and stop false/misleading content, and share data about developed responses and their efficiency.
- Develop curatorial responses (content moderation, curation of sources, fact-checking) that encourage users to access journalism from news organisations that practice critical, ethical independent journalism.
- Support and fund independent fact-checking networks, independent journalism, media literacy initiatives as well as research into disinformation.
- Approach political disinformation and disinformation related to climate change in the same way (and with same urgency) as Covid-related disinformation.
- Ban online violence targeting journalists.
- Apply fact-checking to all political content (advertising, opinions, speech) published by politicians, political parties, etc.
- Publish transparency reports on disinformation in platforms (origin, scale, etc.) and actions to address it (content/account removal, demonetization, etc.).

4. Media sector

- Increase investment in fact-checking, debunking, and enhance transparency with regard to political actors, states, institutions, and the corporate sector.
- Collaborate with other news organizations and audiences to debunk disinformation.
- Focus on countering disinformation through accessible and engaging story formats (infographics, podcasts) along with data-driven investigation.

⁴²² Source: https://www.broadbandcommission.org/Documents/working-groups/FoE_Disinfo_Report.pdf

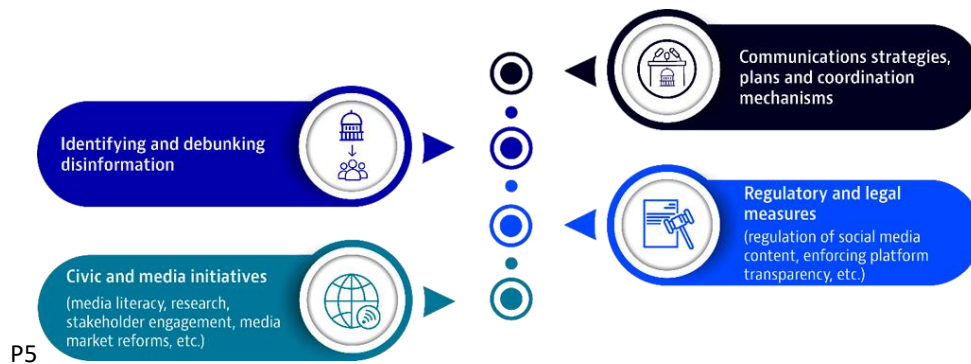


Figure 17 - Range of governance responses to disinformation. Source: OECD⁴²³

5. Civil society

- Partner with other stakeholders on investigative and monitoring projects about disinformation.
- Roll out media and information literacy programs and consider how to target children as well as older citizens who are more susceptible to disinformation.
- Produce campaigns against disinformation.

OECD paper on “Governance responses to disinformation: How open government principles can inform policy options”

This OECD report⁴²⁴ presents a “holistic policy approach to disinformation by exploring a range of governance responses that rest on the open government principles of transparency, integrity, accountability and stakeholder participation.” The authors focus on four areas: public communication, direct responses to counteract disinformation, regulatory and legal policies, and civic and media initiatives to improve the ecosystem (Figure 17).

In the following, we briefly present the range of actions that can be undertaken to combat disinformation, under these four areas on intervention.

1. Public communication

Public communication can “serve as a vehicle for transparent, truthful and accurate information”, enable dialogue with the citizens and create opportunities for public participation. Such policies however, face several limitations, mainly having to do with the lack of required skills to support digital communication and mechanisms to respond to the rapid spread of disinformation. For that

reason, governments should concentrate their efforts in:

- **Development of strategies, plans, guidelines and codes of conduct** to help public officials plan and execute consistent and effective communication.⁴²⁵ This necessitates a clear structure for the coordination of relevant agencies and authorities.
- **Use of social media** to reach a wider audience and enhance engagement with citizens, improving two-way interaction with citizens, and transparently informing them about public policies.⁴²⁶

2. Efforts to counteract disinformation

Governments can formulate policies and undertake actions to respond to disinformation, including debunking potentially harmful to public health, democracy and national security false claims. More specifically, they could adopt policies for:

- **Analysis of disinformation ecosystems** to understand the phenomenon, the role of stakeholders, the impact on society and democracy, and challenges in attempting to respond. Governments should create expert groups and commission reports that will help regulators develop effective policies.^{389,427}
- **Collaboration and co-ordination** at national and international level to exchange knowledge, skills, and best practices, and coordinate effective responses to disinformation. Such a successful example is the EU Rapid Alert System, a digital platform where Member States and EU institutions can share insights on disinformation and coordinate responses.⁴²⁸ This was used to address coronavirus disinformation.

423 <https://www.oecd.org/coronavirus/policy-responses/transparency-communication-and-trust-the-role-of-public-communication-in-responding-to-the-wave-of-disinformation-about-the-new-coronavirus-bef7ad6e/#figure-d1e461>

424 Matasick, C., C. Alfonsi and A. Bellantoni (2020) Governance responses to disinformation: How open government principles can inform policy options. OECD Working Papers on Public Governance, No. 39, OECD Publishing, Paris, <https://doi.org/10.1787/d6237c85-en>

425 GCS Emergency planning Framework: <https://gcs.civilservice.gov.uk/publications/emergency-planning-framework/>

426 GDS Social Media Playbook: <https://www.gov.uk/guidance/social-media-playbook>

427 Jeangène Vilmer, J.-B., Escorcía, A., Guillaume, M., Herrera, J. (2018) Information Manipulation: A Challenge for Our Democracies. Report by the Policy Planning Staff (CAPS) of the Ministry for Europe and Foreign Affairs and the Institute for Strategic Research (IRSEM) of the Ministry for the Armed Forces, Paris, August 2018.

<https://www.diplomatie.gouv.fr/en/french-foreign-policy/manipulation-of-information/article/joint-report-by-the-caps-irsem-information-manipulation-a-challenge-for-our>

428 Rapid Alert System (RAS) factsheet: https://eeas.europa.eu/sites/default/files/ras_factsheet_march_2019_0.pdf

- **Increased capacity to counteract disinformation.** Governments can create toolkits and training material to help detect and respond to disinformation. Such an example is UK’s RESIST Toolkit.⁴²⁹

3. Regulatory responses

Governments can also adopt a range of responses aiming to regulate the media and digital news market, making sure at the same time that freedom of expression is protected and that innovation is not hampered. Four lines of action can be followed:

- **Build on and expand existing regulatory tools** (e.g. for traditional media) to regulate the new media market (i.e. online media and platforms) on transparency, consumer privacy, competition and data handling.
- **Adopt co-operative approaches to design effective regulations.** One approach is self-regulation and codes of ethics similar to the Code of Practice against Disinformation. However, its success lies on the willingness of signatories, which is often not enough. Another approach is the “co-creation of regulation” based on direct collaboration between governments and platforms.^{430,431}
- **Regulation of social media platforms** includes several approaches: promotion of competition and removal of barriers (e.g. by requiring user data portability⁴³²), increasing transparency by requiring platforms to share more data on their algorithms or the funding of advertisement, addressing the problem of bots and anonymity, restricting micro-targeting and profiling, and empowering users among others.
- **Direct regulation of platform content**, aiming at disinformation or hate speech. Governments should refrain from such regulatory attempts, which may lead to censorship and limiting freedom of speech.⁴³³

4. Civic and media initiatives

This includes policies that improve the media and information ecosystem in a broader way by supporting independent media, promoting media literacy, and ensuring all citizens have access to information.

- **Promoting transparency, access to information and open data.** This includes policies for proactive disclosure of information by journalists, safeguarding freedom of the press, providing open data to citizens

(e.g. evidence-based and factual information for the pandemic and other major societal issues), etc.

- **Supporting and expanding media pluralism.** The share of traditional media in the market continues to decline while social media giants dominate audiences and advertising revenues. This calls for competition policies that bring balance as well as policies that support public service media and local media, encourage high-quality journalism, foster initiatives for training citizen journalists.⁴³⁴
- **Media and digital literacy** initiatives and policies aim at empowering citizens by making them critical consumers of news and content and providing basic skills for navigating the digital world. Such efforts for educating citizens and training journalists could be undertaken by national governments, at the European or international level but also in cooperation with civil society and the media. They can target school or university curricula but also people of all ages.
- **Multi-stakeholder participation platforms** can bring together governments, regulators, media, civil society and academia to create a coalition that will research, discuss and design policies for the media and against disinformation. In addition, deliberative democracy initiatives that promote civil discussion of important societal issues can help create informed citizens that are resilient to disinformation.

United Nations Human Rights Council report on “Disinformation and freedom of opinion and expression”

The UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression published a report that examined the threats imposed by disinformation.⁴³⁵ According to it, responses by states and companies are inadequate, states should support independent and diverse media, invest in media literacy, and empower their citizens and for companies to review their advertisement-driven business model. The report emphasizes the need for multidimensional, multi-stakeholder responses that are summarized below.

Recommendations for states

- Refrain from engaging in disinformation in any way or restricting freedom of expression.

429 RESIST Counter Disinformation Toolkit: <https://gcs.civilservice.gov.uk/publications/resist-counter-disinformation-toolkit/>

430 Nahema Marchal, “Unpacking France’s “Mission Civilisatrice” To Tame Disinformation on Facebook”, Council On Foreign Relations Blog (2018): <https://www.cfr.org/blog/unpacking-frances-mission-civilisatrice-tame-disinformation-facebook>

431 Mark Scott, “How Big Tech learned to love regulation”, Politico (2018): <https://www.politico.eu/article/google-facebook-amazon-regulation-europe-washington-brussels-privacy-competition-tax-vestager/>

432 Art. 20 GDPR (EU) 2016/679: Right to data portability. <https://gdpr-info.eu/art-20-gdpr/>

433 Hyman Rights Watch, “Germany: Flawed Social Media Law” (2018): <https://www.hrw.org/news/2018/02/14/germany-flawed-social-media-law>

434 <https://www.cjr.org/watchdog/europe-fights-fake-news-facebook-twitter-google.php>

435 Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, Irene Khan on “Disinformation and freedom of opinion and expression”, Human Rights Council (2021): <https://undocs.org/A/HRC/47/25>

- Criminal law should only be used in exceptional cases (incitement to violence, hatred or discrimination).
- Avoid requiring companies to remove lawful content or making determinations about the legality of content that should be made by courts.
- Regulation of social media should focus on increasing transparency, due process rights for users and respect of human rights.
- Adopt strong data protection-laws and limit online user monitoring and micro-targeting.
- Increase transparency of government and share data.
- Safeguard media freedom and diversity and ensure journalists safety.
- Launch digital inclusion and media literacy initiatives for all ages and add media literacy to school curricula.

Recommendations for companies

- Review current business models and make sure that business operations, data collection and processing adhere to human rights standards and law.
- Conduct regular human rights impact assessments of products, particularly of the role of algorithms and ranking systems in amplifying disinformation.
- Review current advertising models, be transparent about targeting advertisement criteria, create public advertisement databases, and allow users to opt out of advertisement.
- Consult with relevant stakeholders to formulate clear policies with regard to disinformation (for content and advertisers) and adopt clear and consistent policies for public figures.
- Provide information on algorithms and recommender systems, ensure users receive a diversity of views and allow users to control their experience.
- Provide detailed transparency reports on actions against disinformation content and appeals.
- Establish internal appeal mechanisms to allow user recourse and create external oversight mechanisms.
- Introduce policies and mechanisms to confront gender disinformation and apply a gender perspective in the platform experience.
- Collaborate with local civil society and groups to understand local contexts of disinformation, e.g. with regard to developing countries, minorities etc.
- Make platform data available to help research and policy making.

Overview of responses against disinformation adopted by European governments

European governments have taken different approaches to fight disinformation. These are summarized in the

latest Poynter guide to anti-misinformation actions⁴³⁶ and briefly presented in the following.

In Denmark, the government has set up a task force that is responsible for developing responses to widespread misinformation campaigns and foreign disinformation. It has also engaged in media literacy efforts. In Netherlands, the government launched a campaign to inform people about online disinformation. In Belgium, the government established a group of experts to propose solutions and also launched a website to inform the public of the disinformation problem. In Sweden, the government launched a new “psychological defence” to counteract disinformation and foreign influence campaigns with factual public information.

In France, a new law has passed that allows authorities to remove manipulated content from sites that publish it via a judicial procedure while it requires platforms to publish information about sponsored content and campaign ads. The law also enables the national broadcasting regulator to unilaterally revoke TV and radio licenses from outlets that ‘disseminate disinformation’ or are ‘under the control or influence of a foreign state’. In Germany, a law against hate speech requires platforms to remove ‘obviously illegal’ content within 24 hours and fines them up to 50 million euros, if they fail. In Italy, during the 2018 elections the government set up a website for citizens to report misinformation to the cyber-crime unit of the Police, which checked information veracity and examined whether any laws were broken.

In Hungary, in 2020 the government amended the criminal code to include a new offense for the publication of “fake” or “distorted facts” about the pandemic, punishable by up to five years of prison. According to the Human Rights Watch annual review, the police launched 134 criminal investigations about “fear mongering”, which mostly concerned people that were critical on social media about the handling of the pandemic, which may imply that the government used the law to silence criticism and opposition.

ANALYSIS AND SYNTHESIS OF POLICY RECOMMENDATIONS FOR COMBATING DISINFORMATION

Several attempts to decode the disinformation ecosystem and provide relevant policy recommendations were presented in the previous section. A key observation from the above is that the phenomenon of disinformation cannot be addressed with fragmented, one-dimensional or purely regulatory policies. It necessitates a well-coordinated multi-dimensional, multi-faceted, multi-stakeholder policy framework that assigns fair responsibility to and requires decisive action from all

⁴³⁶ <https://www.poynter.org/ifcn/anti-misinformation-actions>

relevant stakeholders, according to their role and capabilities. The framework should consider responses along different but complementary dimensions, including education, platform regulation, media freedom and diversity, user empowerment, journalistic ethos and practices, open government, election integrity, research for new tools and technologies, exchange of information and knowhow, etc., in order to combat disinformation in a holistic and efficient way.

In all cases, and irrespective of the individual measures proposed in each work, it is important to recognize how all of these policy recommendations are formulated with an eye to respect individual rights and freedoms and promote enhanced transparency and accountability for all relevant stakeholders.

To efficiently study and eventually synthesize the previously presented policy, we conclude our study with the proposal of a disinformation policy classification framework that consists of six main dimensions and several sub-dimensions, called policy categories (**Figure 18**). These are inspired by the pillars of the HLEG report, the Democracy Action plan and the typology proposed in the ITU/UNESCO BCSO report. Under each policy sub-dimension/category, we assigned several policy interventions and responses summarised in **Figure 18** and presented in more detail in **Figure 19** of ANNEX III and Table 1 of ANNEX IV, further clarifying for each policy category who is the primary actor (i.e. who initiates the response), who is the target (i.e. which stakeholders will benefit or be affected by the response) and whether the

response is taking place in the national, European, platform, media outlet, etc. level. This allows to obtain a clear picture of what most researchers and organisations consider important in the fight against disinformation. One thing made clear by this table is that there is no shortage of solutions that could be adopted. At the same time, it is evident that some solutions are more popular than others and that there are certain basic assumptions on which researchers and organisations agree when it comes to the necessity, efficiency and applicability of these policies.

In the rest of this section, we analyse the policy recommendations of each category and discuss the challenges involved in their implementation.

1. Enhancing transparency

Enhancing the transparency of the whole digital media ecosystem is fundamental for combating disinformation. Transparency should be demanded from the platforms, media, advertisers, governments and political actors and should apply to online advertisement, political messaging and funding, algorithms and data, and to content and content sources. This also involves open government policies as well tools for content verification and news fact-checking. A transparent digital environment enables fair elections by revealing how political advertising funds are distributed and limiting micro-targeting. It empowers citizens by allowing them to assess the veracity of news and credibility of sources, and the society by providing the means to understand how disinformation spreads.



Figure 18 - Disinformation policy classification framework. The framework comprises of six dimensions while under each dimension there are several policy categories. (Images taken from Flaticon.com)

a) Funding and advertising

Many research papers and articles have been written focusing on how fake news websites and other sources make money from spreading disinformation. In 2019, the non-profit Global Disinformation Index published a study based on 20,000 sites collected from sources such as PolitiFact and Le Monde.⁴³⁷ The study showed that \$235M of advertising ended up on domains that were flagged for disinformation, fuelling their sustainability and making disinformation a profitable business.

To address this issue, policies must be enforced by social media platforms that eliminate financial incentives for disinformation spreading by demonetizing sites that have been found to promote disinformation by independent fact-checking organizations, creating black-lists of such sites and by being transparent about advertising, especially in the political context (e.g. creating a database of advertisement funding: funders, recipients, who is being targeted and how, or even financially penalizing false claims in political advertising⁴³⁸). Cutting the funding to disinformation sites will also allow advertising funds to go to sources that promote high-quality information.

It is also important for companies to explicitly tag sponsored content or the use of influencers and robots for content dissemination and clearly identify the source or owner of content. Another key response proposed by several studies is the restriction or banning of micro-targeting and psychological profiling of users, which is mainly adopted for political advertising.⁴³⁹ For example, in the Cambridge Analytica case,⁴⁴⁰ Facebook profile data was used to infer users' personality and then matched against voter registration records to create voter lists with psycho-political profiles, which were sold to political parties to micro-target voters and influence their vote.

According to the UN HRC study, "algorithms, targeted advertising and the data harvesting practices of the largest social media companies are largely credited with driving users towards 'extremist' content and conspiracy theories that undermine the right to form an opinion and freedom of expression". All the above make it obvious that it is imperative for companies to review and adjust their advertisement-driven business model.

b) Content quality indicators

Almost all studies agree that in order to help users assess the veracity of content and identify disinformation it is crucial to provide them quick information about the source and its quality. This is done through the so-called

'nutritional labels' that should ideally accompany all online content. These labels may provide information about the source, the ownership, the journalistic processes it follows, its track record with regard to disinformation, etc. An example of such a tool is the NewsGuard browser extension.⁴⁴¹ What is important about these labels is to provide accurate information without overwhelming the user. This is why simple visual quality indicators are favoured.

Platforms, media and civil society should work together to develop a set of information quality labels, which will then be used by platforms to inform and warn their users about the potential quality of the content they access and in that way help them to responsibly consume it.

c) Transparency of algorithms and data

A policy recommendation that comes across in every study about disinformation is the need for platforms to share more information about how their algorithms work as well as more data. This is necessary for several reasons:

- The wealth of data collected by platforms is valuable to researchers and civil society in order to understand the mechanisms for disinformation production and distribution and its impact on citizens, elections and democracy, trust to government and institutions, etc.
- By sharing information about how their algorithms (for search, newsfeed recommendation, etc.) work and the kind of data collected and how it is used, platforms can empower the users and bring balance to their relationship with them.
- Understanding how algorithms work may also help traditional media to know where and how to disseminate their content.
- This is a human rights issue, since transparency about data and algorithms and scrutiny from the public, the governments and the research community may lead to less user manipulation especially for vulnerable groups, enforce respect on data protection and data privacy regulations, and ensure due process for users.

Sharing of data and information on algorithms was up to this point voluntary. However, it seems that this approach is not working. Many studies suggest that social media companies should be obliged to provide specific information and this should be mandated by regulation. To this end, it should be required by social media companies to regularly provide comprehensive reports on transparency, including detailed information about disinformation spreading in their platforms, actions taken to address it and how their effectiveness was assessed.

437 https://disinformationindex.org/wp-content/uploads/2019/09/GDI_Ad-tech_Report_Screen_AW16.pdf

438 Van Alstyne, M.W. (2020) Proposal: a market for truth to address false ads on social media. Communications of the ACM, 63(7), 23–25, <https://doi.org/10.1145/3401724>

439 <https://www.palgrave.com/gp/blogs/social-sciences/madsen>

440 <https://www.theguardian.com/news/series/cambridge-analytica-files>

441 <https://www.newsguardtech.com/how-it-works/>

d) Fact-checking and verification

Fact checking and content verification have never been more essential than today with the pandemic, elections and global unrest providing fertile ground and endless possibilities for disinformation and misinformation that can directly affect public health, democracy, institutions, and economy. The Duke Reporters' Lab identified 341 active fact-checking projects in at least 102 countries in 2021, an amazing growth compared to 44 fact-checkers in 47 countries in 2014.⁴⁴² Half of them are affiliated with media organisations (national news publishers and broadcasters, local news sources, digital-only outlets) while others are affiliated with non-profit groups and NGOs or academic institutions.

Responses proposed under this category include media and platform investment in fact-checking tools, services and human resources but also cooperation of journalistic organisations with independent fact-checking projects. Moreover, they emphasize cooperation of civil society with relevant stakeholders (journalists, platforms, and fact-checkers) for coordinated efforts. Special attention is required to visual-based disinformation (e.g. memes) and new forms of audiovisual content manipulation (deepfake video) that can be much more persuasive and engaging than text. Investments should be made on new tools to combat and debunk this type of disinformation. Finally, it is also important to share data that are relevant to disinformation, including fact-checking and verification attempts, consequent actions to remove, demote or label content, and the efficiency of these approaches.

e) Election integrity

Election integrity is the cornerstone of democracy. At the same time, it is an important aspect in the fight against disinformation, given that disinformation campaigns can play a significant role in shaping elections results by casting doubt on elections or discouraging participation of groups of citizens, in addition to the dissemination of content that tries to turn the tide of public opinion in favour or against politicians and political parties.

Previous studies on the matter propose regulatory responses that aim to increase transparency of political funding and advertising by requesting from politicians, political parties and platforms to publish relevant data. Moreover, they encourage close cooperation between states and institutions aiming to exchange best practices and information and develop coordinated actions for tackling foreign interference and disinformation in national and European elections.

f) Open government

Governments should not only require transparency by other stakeholders; they should themselves strive to be transparent. The OECD working paper proposes a set of responses to disinformation relying on open government principles. Open data and information sharing is the cornerstone of this approach. Since disinformation is based on false data and erroneous claims, governments are encouraged to share as many data as possible with the public. Such data can help journalists provide high-quality news and debunk disinformation, it can help researchers studying various socio-economic phenomena to develop analyses driven by evidence and it will make citizens better equipped against disinformation.

2. Improving media literacy

Regulatory interventions by government, technical responses by platforms, and pledges to ethical codes of conduct by media will never be enough in the fight against disinformation until citizens, the targets of disinformation campaigns, take a more proactive role in identifying misleading content, responsibly consuming news and navigating the online world with knowledge.

To this end, all proposed policy frameworks highlight the need for large-scale media literacy initiatives, addressing different groups of citizens and promoting the skills that will allow navigating the digital environment confidently and participating in the public dialogue responsibly. Media literacy provides a "framework to access, analyse, evaluate, create and participate with messages in a variety of forms" and builds "an understanding of the role of media in society as well as essential skills of inquiry and self-expression."⁴⁴³ It has been shown that such literacy campaigns can significantly improve the ability to tell authentic from false news.⁴⁴⁴ Two main lines of action are proposed as discussed below.

a) Media literacy in schools

The first line of action involves integrating media literacy in the formal education system by i) updating school curricula to include media literacy courses and by training teachers, and by ii) updating the curricula of Higher Education journalistic schools. Ministries of Education, academia and the civil society have an important role to play in this direction. Proposals include the extension of school ranking systems like PISA to include criteria on media literacy and the use of established programs like ERASMUS to fund teacher training. The participation of journalists is also considered important in this type of policies, e.g., participating in school initiatives to explain

⁴⁴² <https://reporterslab.org/fact-checking-census-shows-slower-growth/>

⁴⁴³ <https://www.medialit.org/media-literacy-definition-and-more>

⁴⁴⁴ <https://www.pnas.org/content/117/27/15536>

news production and journalistic processes to students. Going a step further, organisations like UNESCO point out the need “to engage young people as catalysts for change, as co-creators and co-leaders of media and information literacy development and dissemination”, instead of simply considering them as beneficiaries of media literacy.⁴⁴⁵ To this end, UNESCO is partnering with youth organisations to guide them to integrate media literacy in their organization policies and programs.⁴⁴⁶

b) Digital and media literacy for all

The second line of action proposes the development and promotion of media literacy actions. These should be inclusive, and especially focus on older people, vulnerable groups and minorities, and on people who are not digital natives and may be more susceptible to disinformation. These programs should help citizens understand media institution functioning and policies and equip them with adequate skills to be able to analyse media content accurately, think critically, and communicate effectively in the digital environment. Some also propose training citizens to identify false news and evaluate the quality of sources. In addition, other studies place a specific focus on literacy programs that enhance the quality of information and promote knowledge around election mechanisms and the science of political debate.

Such programmes should be initiated in both national and European level and funded by both government and civil society, while the cooperation of platforms and media would be required. For their development, existing best practices and models like the Safer Internet Centres⁴⁴⁷ could be adopted and adjusted to the needs and characteristics of the target groups. Some even suggest the provision of regular reports by Member States, detailing the actions undertaken towards this direction.

3. Empowering stakeholders online

In the same vein as media literacy policies, empowering citizens, users and journalists will allow them to harness platforms and the Internet, balancing out negative effects and using them effectively to their benefit for better communication, information and engagement. Online empowerment aims to give platform users agency over their data and online experience, citizens a voice in online policy debate, space for enhanced communication with the government and access to helpful and reliable data, and journalists the necessary resources to effectively do their job and provide high-quality news in an online environment polluted by disinformation. Three main lines of action are proposed.

a) Empowering platform users

Algorithmic and data transparency is a first step towards empowering users but more is required. It is important for the users to know how algorithms work but it is as important that the users have control over the platform’s functioning and their online experience.

The existing operational model of passive users that accept the provided services as is, leaving it to platforms to know better what news or other content they should be served is not only unsustainable in the long-term but in many ways contrary to democratic values and the right to pluralism, self-expression and self-conscious action. To this end, recommendations suggest that immediate action is taken to develop tools that will allow users to better control access to information. For example, the HLEG report proposes the development of appropriate user interfaces for browsers and smartphones that will allow users to control the parameters that define what will appear in their newsfeeds and search results, e.g. by using filters to block specific content or favour other. Others require that users are provided with content quality indicators or be able to opt-out of advertisements. Most propose that recommendation engines should ensure a minimum amount of pluralism by default by including different views on some topic in their results or presenting results from different independent sources so as to combat the phenomenon of echo-chambers and information bubbles. Another recommended response is the development of mechanisms for users to exercise their right to rectify false stories or object to and get more information to content moderation decisions.

Although such recommendations are usually left to the volition of platforms to implement, a lot of proposals now suggest that there should be regulation that ensures algorithmic transparency, on one hand and necessitates that platforms grant at least some minimum control to the user to personalize her experience, on the other. The report of the UN Human Rights Council points out that “in the platform world, individuals are regarded as users, not as rights holders with agency” and suggests that platforms should start “acknowledging the agency and autonomy of users as rights holders and empowering them by increasing transparency, control and choice and by ensuring due process.”

b) Empowering citizens

While empowering users to use online platforms and services in their benefit is the duty of platforms (in many cases enforced by governments through regulation), empowering citizens in general to navigate the online

⁴⁴⁵ <https://www.dw.com/en/empowering-young-people-and-adults-to-tell-fake-news-from-facts/a-55128051>

⁴⁴⁶ <https://en.unesco.org/news/network-youth-organisations-south-east-europe-adopts-mil-policies>

⁴⁴⁷ <https://digital-strategy.ec.europa.eu/en/policies/safer-internet-centres>

world and be able to identify and resist disinformation is the duty of governments. This aspect is highlighted in the OECD report that perceives responses to disinformation through the lens of open government principles. Yet, almost all studies highlight in one way or another aspects of citizen empowerment. Responses of this category can be grouped under the following sub-categories:

- **Consultation/deliberation:** Many studies urge the EU and national governments to develop or extend the mechanisms that will allow effective civil debate between citizens and institutions and government, allowing citizens to express their opinions on different policy matters, vote to decide on policy actions, and assess enforced measures. Such initiatives can be based on existing EU or national experience. The aim is to inform citizens on critical issues, provide them with the data to make their own decisions and assess the truthfulness of other opinions or sources, and ultimately develop critical thinking and debate skills to effectively deal with disinformation and responsibly communicate and behave in the online environment. In addition, such initiatives will provide citizens with a much needed understanding of how institutions work and how policies are developed, as well as a sense of agency over the decisions made. This is increasingly important in the online landscape where scepticism over institutions and distrust towards elites that make decisions fuels conspiracy theories and makes citizens susceptible to fringe points of view as long as they seem to be against the 'system'.
- **Access to open data:** Public sharing of government data can be decisive against disinformation, giving citizens, civil society actors and journalists necessary evidence to identify disinformation. In addition, open data initiatives (by both governments and research institutions) can make citizens better informed on important socio-economic issues that may fuel partisanship and falsehoods. EU and national governments could make available social, economic, scientific and other data on a variety of issues that concern citizens, also responding to disinformation campaigns that may affect citizens in some major way, e.g., disinformation with regard to the efficiency of Covid vaccines, to the integrity of elections, to the effects of climate change, to the causes and effects of immigration, to the distribution of public funds etc.
- **Information campaigns:** While access to open data is important, in most cases it takes a rather informed citizen to make good use of them. To this end, governments and civil society are encouraged to cooperate to launch information awareness campaigns that will a) truthfully and with non-expert, easily understandable language inform the citizens with regard to major disinformation topics (e.g.

vaccines, climate change, etc.), also directing them to relevant open data; and b) inform people about the disinformation phenomenon itself, its origins and production/distribution mechanisms, and its serious effects on society and democracy, also encouraging them to take advantage of available media literacy resources and initiatives.

- **Communication with citizens via social media:** It is important for governments to establish a two-way communication channel with citizens facilitating real-time interaction. Social media is the most suitable medium for reaching a wide audience, given the increasing trend of citizens turning to social media to get informed on what is going on in real-time and react to it. The pandemic made this need even clearer, with citizens turning to their governments to get quickly reliable information. To facilitate such communication, governments are encouraged to develop a toolbox of digital communication strategies, including clear guidelines to help public officials to effectively reach different audiences.
- **Public tools for identifying disinformation:** To empower citizens against disinformation, the EU and national governments could fund research and development of open source tools that would help citizens tackle disinformation as they navigate the digital environment as news consumers.

c) Empowering journalists

Empowering journalists with tools and skills to combat disinformation is crucial. Given the overwhelming amount of disinformation circulating online but also its promotion by politicians, economic interests and social actors with agendas, journalists experience a stressful working environment that enforces them to continuously question the outcome of their work and whether they are serving the public interest to the best of their ability.

To empower journalists to successfully navigate this environment, the first line of response should be for newsrooms to invest in professional tools for automatic disinformation detection, including both fact-checking but also tools for identifying manipulated audiovisual content. At the same time, newsrooms should invest in training journalists to use such tools for debunking disinformation as well as in setting up multi-disciplinary teams for fact-checking. Training initiatives could be funded by government and civil society and realized in cooperation with journalistic and media associations and fact-checker organisations.

To share the burden of the costs involved in debunking disinformation, it is advised that media organisations cooperate both with one another as well as with platforms and independent fact-checking organisations. This would also facilitate the exchange of best practices

and tools and would ultimately lead to faster and more reliable debunking of disinformation in a wider scale.

Another line of response is the funding of media innovation projects implemented by consortia of media organizations and ICT researchers, aiming to reinvent how newsrooms work by exploiting the new automation capabilities offered by AI and big data technologies.⁴⁴⁸ These projects could receive funding by social media but also by governmental research funding programmes.

4. Strengthening media independence and pluralism

Freedom of press and pluralism of media is a cornerstone of democracy that governments are obliged to guarantee. Their importance is key in the age of disinformation.

It is not incidental that every policy framework makes it clear that ensuring media independence and plurality and freedom of expression, on one hand, and supporting the sustainability of the media ecosystem on the other is a crucial response in the combat against disinformation. In the following, we present what kind of recommendations have been proposed along those two directions.

a) Strengthening freedom of the press

As pointed out in the UN report, which views the phenomenon of disinformation through the lenses of human rights, evidence suggests that “disinformation tends to thrive where human rights are constrained, where the public information regime is not robust and where media quality, diversity and independence is weak.” On the other hand, “where freedom of opinion and expression is protected, civil society, journalists and others are able to challenge falsehoods and present alternative viewpoints.”

Stemming from this perspective, all examined policy frameworks point out that government should create a supporting ecosystem for media to flourish without intervening with their editorial independence or limiting in any way their freedom of expression. To promote pluralism, it is crucial to support independent journalism, public service media and local media ecosystems, which provide a stage for civil presentation of different points of views, representing also the voices of local groups that do not often find a place in private national media.

This support can have two forms: regulatory measures that aim at a well-functioning and competitive media marketplace and legislation that strengthens the freedom of the press and freedom of expression, or public funding to media and investments in projects and infrastructure that improve media capacity and innovation.

With regard to legislative initiatives relevant to disinformation, most of the works examined in this report point out that governments should refrain from regulating disinformation since such attempts often lead to censorship. In addition, UN human rights bodies make it clear that criminalising disinformation is inconsistent with the right to freedom of expression.

Unfortunately, the pandemic has been exploited in several occasions to impose questionable laws about disinformation or act in a way that restricts freedom of expression and muzzles the press. For example, in Hungary journalists covering the pandemic faced a variety of sanctions under new laws including prison terms for allegedly spreading false information about Covid⁴⁴⁹ when they asked questions about the government’s preparedness and handling of the crisis. In the Czech Republic, Serbia and Italy, there were cases of journalists who “were prevented from attending press conferences, obtaining information from health authorities or documenting the operations of law enforcement officials.”⁴⁴⁹ Summarizing these phenomena, the 2021 annual report by the partner organisations to the Council of Europe Platform to Promote the Protection of Journalism and Safety of Journalists, states that “in 2020, extraordinary damage was inflicted on the practice of free and independent journalism” in Europe.⁴⁵⁰ Such behaviours and infringements of the European Convention’s rights should be closely monitored by the EC and decisive action should be taken to address them.

As part of the protection of the freedom of the press, governments and the EC should also take measures to protect the safety and well-being of journalists. During the last few years, attacks on the safety and physical integrity of journalists as well as harassment and intimidation have seen a sharp increase, which is encouraged by the impunity of such behaviours. As the annual report of the Council of Europe points out “the lack of progress in bringing to justice the perpetrators, instigators or masterminds of murders of journalists is alarming”. Governments should legislate and create institutional safeguards to prosecute and discourage abusive behaviour against journalists. In the same vein, action should be taken to protect journalists from strategic lawsuits against public participation (SLAPPs).

Another issue to consider with regard to media pluralism, is ownership concentration in the supply and distribution of information, and ownership transparency (i.e., disclosure of ownership to public bodies and to the public). According to the Media Pluralism Monitor 2020

448 An example of such a project is the AI4Media Centre of AI Excellence, <https://www.ai4media.eu/>

449 <https://www.coe.int/en/web/media-freedom/-/press-freedom-must-not-be-undermined-by-measures-to-counter-disinformation-about-Covid-19>

450 <https://rm.coe.int/final-version-annual-report-2021-en-wanted-real-action-for-media-freed/1680a2440e>

report,⁴⁵¹ concentration of media to a few rich owners “jeopardises market pluralism and represents a high risk across most of Europe with no country recording a low risk”. In addition, according to the same report, only four countries (France, Germany, Luxembourg and Portugal) have a low risk with regard to the transparency ownership indicator. This issue of media ownership is key to ensure diversity and pluralism. In this direction, governments could impose rules and limits on horizontal concentration in traditional media markets to ensure sufficient diversity.

b) Ensuring long-term sustainability of media

Apart from legislative responses and safeguards that enhance the freedom and independence of the press and guarantee media pluralism, it is also important to ensure the long-term sustainability of private, independent and local media ecosystems. A few options can be considered in national and European level, besides funding.

- Support quality and independent journalism, e.g., through funding of European or national journalism projects that address disinformation, make use of data-driven techniques or provide multi-disciplinary independent reporting on socio-economic or political issues of wide interest.
- Fund research and innovation projects that promote cooperation between media and ICT researchers, aiming to modernize the newsroom and offer novel tools to journalists to fight disinformation, exploiting advances in AI, big data and language technologies.
- Consider tax-breaks for media or media projects that adhere to specific journalistic quality criteria.
- Apply transparent and fair processes for providing state aid and funds for state advertisement to media, respecting independence of the press, media pluralism but also free market competition. This is an important issue connected to both sustainability and media independence. According to the Media Pluralism Monitor 2020 report,⁴⁵¹ state advertising, which is an indirect form of state aid, is problematic in most EU countries due to the fact that the majority of countries fail to ensure state advertising distribution to the media based on fair and transparent rules.

Another dimension that should be considered with regard to media viability is the “disruptive role of digital intermediaries (search engines and social networks) whose capacity for targeted advertising has shifted revenue away from traditional news publishers”.⁴⁵¹

451 <https://cmpf.eui.eu/mpm2020-results/>

452 <https://guides.lib.uw.edu/research/commstudies/ethics>

453 Díaz-Campo, J., & Segado-Boj, F., “Journalism ethics in a digital environment: How journalistic codes of ethics have been adapted to the Internet and ICTs in countries around the world”, *Telematics and Informatics*, 32 (4), 735-744 (2015).

454 <https://www.theguardian.com/technology/2016/nov/10/facebook-fake-news-us-election-mark-zuckerberg-donald-trump>

455 <https://www.nytimes.com/2018/11/14/technology/facebook-data-russia-election-racism.html>

456 Lauer, D. Facebook’s ethical failures are not accidental; they are part of the business model. *AI Ethics* 1, 395–403 (2021). <https://doi.org/10.1007/s43681-021-00068-x>

457 <https://www.theguardian.com/technology/2019/mar/17/the-cambridge-analytica-scandal-changed-the-world-but-it-didnt-change-facebook>

5. Promoting ethical conduct

Ethical conduct of traditional media and new digital media is essential in the fight against disinformation and necessary for improving the trust of citizens to the press and platforms. To promote ethical behaviour that respects human rights, freedom of expression and freedom to information, platforms, media, fact-checking organisations, and government should work together to enforce clear and acceptable rules of conduct and operation. This can be done in two ways: through a self-regulatory approach that allows journalists and platforms to set their own codes and rules and police themselves in their implementation or through government regulations to media and platforms and monitoring compliance by independent authorities.

a) Self-regulation of media & platforms

Journalists, media and fact-checkers have for a very long time been setting their own ethical codes of conduct and journalistic standards and principles such as truthfulness, accuracy, objectivity, impartiality, fairness, and public accountability⁴⁵² as presented in detail in Chapter 2. The need to adhere to such codes and promote ethical journalism is deemed very important in most of the examined studies, which also suggest adaptation of such codes and practices to the new digital environment and the era of online disinformation. Since the journalism process itself has changed radically in the last years, there is a need to also revise these codes,⁴⁵³ while the explosion of disinformation and the erosion of public trust to media necessitates strong enforcement of these rules.

Many of the examined studies also highlight the need of platform self-regulation and adherence to basic ethical obligations to combat disinformation. Yet, the efforts of social media companies to self-regulate and address disinformation in their own services has not been successful, as shown by Facebook’s failure to take seriously disinformation in their platform and its impact on the outcome of the 2016 US elections.^{454,455,456} In addition, the Cambridge Analytica scandal⁴⁵⁷ further diminished citizens’ and governments’ trust in social media and in the ability or willingness of big platforms for self-regulation. However, the outcry of the public and harsh reality itself has at the end contributed to making the platforms more aware of their responsibility, resulting in renewed efforts for self-regulation (such efforts are

discussed in the UNESCO, CoE and EPC reports). The HLEG report proposed the Code of Practice on Disinformation that calls for big platforms and advertisers to pledge to comply with self-regulatory standards to fight disinformation, the first worldwide attempt of its kind. The importance of the Code of Practice is highlighted in other studies as well but all of them point out an urgent need to strengthen it, calling for stronger commitments by the signatories and more robust monitoring mechanisms. This need has also been recognized by the EC, which recently published a guidance to strengthen the Code.⁴⁵⁸

In the same vein, some suggest responses that involve more diligent and comprehensive frequent public reporting by platforms with regard to their ethical conduct, compliance with the code, and assessment of their approaches and tools against disinformation. The EPC report recommends that the code and similar voluntary frameworks of conduct should be widely advertised by both the EC and signatories themselves so that the public holds signatories accountable when not doing enough. To this end, platforms should publish detailed reports on their efforts to spread awareness among their users about the Code and what they are doing to meet their commitments.

Ethical conduct recommendations are also targeted at governments, with several studies proposing the adoption of mechanisms at the EC or international level to monitor government initiatives against disinformation and adherence with human rights.

Another emerging issue highlighted by the UN and UNESCO reports is the need for platforms and media to take into consideration gender issues in their practices and confront gender disinformation as a priority. According to the UN report, “gendered disinformation campaigns are increasingly being used to deter women from participating in the public sphere” but also against feminism agendas and issues of sexual and reproductive health. The term “sexualized disinformation” is used by a relevant news article⁴⁵⁹ to describe efforts to destroy women’s reputations and push them out of public life, facilitated by the anonymity offered by social media and ingrained sexism.⁴⁶⁰ The UN report recommends that platforms “introduce appropriate policies, remedies and mechanisms that are tailored from a gender perspective across all aspects of the platform experience” in close cooperation with affected parties.

b) Government regulation

Another line of recommendations pertains to regulation. Governments can adopt a wide range of regulation on the media and digital news market. Media regulation is already addressed by national and EU bodies as well as by independent authorities (cf. Chapter 2). Notably almost none of the examined proposals offers recommendations for traditional media regulation but rather call for better implementation of existing frameworks and specifically point out the danger of regulation that may limit freedom of press and lead to censorship or penalizing journalists.

On the other hand, what almost all studies recommend is some kind of platform regulation. As was pointed out in several cases above, self-regulation is good but when it comes to platforms it has been shown to be inadequate. Platform regulation is increasingly considered as the necessary next step to protect users and human rights. As the OECD study points out, the problem is effectively summarized and positioned in the rights framework by historian Ann Applebaum in a WaPo opinion article⁴⁶¹: “The question now is to find the equivalent of licensing and public broadcasting in the world of social media: to find, that is, the regulatory or social or legal measures that will make this technology work for us, for our society and our democracy, and not just for Facebook shareholders. This is not an argument in favor of censorship. It’s an argument in favor of applying to the online world the same kinds of regulations that have been used in other spheres, to set rules on transparency, privacy, data and competition.”

In this direction, the OECD report proposes building on and adapting or expanding existing regulatory tools (e.g., used for traditional media, advertisers, or financial markets) to regulate the online media ecosystem, setting strict rules on transparency, user rights, consumer privacy, competition, data processing, etc.

Recommendations for platform regulation include provisions for increased transparency (algorithms, data, advertisement, policies, disinformation), restrictions in micro-targeting and psychological profiling, tools for user empowerment (e.g., control over algorithm results and data), safeguards for data protection and privacy, action to curb anonymity and identify bots, limitations in the use of AI and automation, data portability etc. The EC has already taken significant steps in addressing these issues with regulations such as the General Data Protection Regulation (GDPR), Digital Services Act (DSA), and Digital Markets Act (DMA), aiming to create a more open and safe online space for European citizens.

458 <https://digital-strategy.ec.europa.eu/en/library/guidance-strengthening-code-practice-disinformation>

459 <https://www.codastory.com/disinformation/how-disinformation-became-a-new-threat-to-women/>

460 <https://cdt.org/insights/facts-and-their-discontents-a-research-agenda-for-online-disinformation-race-and-gender/>

461 https://www.washingtonpost.com/opinions/global-opinions/regulate-social-media-now-the-future-of-democracy-is-at-stake/2019/02/01/781db48c-2636-11e9-90cd-dedb0c92dc17_story.html

Again, one issue stressed in many studies is how governments should refrain from regulating platform content. According to the latest Poynter guide to anti-misinformation actions,³⁵⁴ the French government passed a law that allows authorities to remove manipulated content spread via social media and block the sites that publish it via a judicial procedure. In Germany, a law against hate speech requires platforms to remove ‘obviously illegal’ content within 24 hours and fines them up to 50 million euros, if they fail. As pointed out in the European Policy Centre study, the laws in France and Germany have hardly been used to date, a fact that may demonstrate that they are ineffective when it comes to real life. However, the fear of fines, blocking and bad publicity may lead platforms to overzealously remove content just to err on the safe side,⁴⁶² which leads to indirect censorship. At the same time, such laws in the hands of governments that are less respectful of freedom of expression may lead to unconstrained censorship. Most studies make it clear that regulation of content should only be used for exceptional cases when it is evident that it incites to violence, hatred or discrimination and that judiciary power should make this determination. Special attention is given to responses on regulating Internet advertising similar to how broadcast advertising is regulated, with emphasis on political advertisement.

6. Countering disinformation

Under this category, we discuss responses that have to do with two main actions that governments can do to i) understand the phenomenon of disinformation and its impact and promote development of new tools, and ii) directly counter disinformation and provide responsibly to citizens relevant debunking information.

a) Monitoring and research

Understanding the phenomenon of disinformation and monitoring its continuous evolution is key for developing successful policies to combat it. The examined studies strongly recommend that national governments and the EU generously invest in multidisciplinary projects to study the phenomenon, its impact on society and democracy as well as the challenges and effectiveness of solutions and monitor relevant technical, social and economic developments both at the national and European level. This can be done either through the commission of multidisciplinary experts groups (like HLEG) or via research programs studying the field. Special focus could be given in analysing the phenomenon on the regional level, e.g. in Eastern Europe, which is targeted often by Russian disinformation campaigns, or focusing on

important societal issues like climate change.

In the same vein, the EPC report suggests that such studies should be complemented by ‘regular opinion polling’ to understand where the public stands with regard to disinformation and thus obtain a better picture of whether adopted policies against disinformation work. An important contribution to studying and understanding this phenomenon would be to share platform data in relation to disinformation production and dissemination and the assessment of the effectiveness of responses implemented by the platforms. The EPC reports points out that “it is unacceptable that these companies can sit on huge amounts of potentially revolutionary information and not release it for public research” and all other examined proposals share this opinion. Indeed, such information would be really helpful for research studies but also for the development of new technological tools. The latter is another very popular suggestion. The EC and national governments should fund research consortia to develop new tools against disinformation,⁴⁶³ in a sprint to get ahead of rapid technological advances in the field of disinformation production and dissemination. Already, the international community has fallen behind when it comes to audiovisual content manipulation and deepfakes. But this course should be reversed.

Finally, the HLEG report proposes establishing a network of European Centres for research on Disinformation, also involving national research organisations, to manage and coordinate efforts and responses like the ones mentioned above. An independent and autonomous European Centre of Excellence could also be created to act as an umbrella organization aiming “to enable an effective networking of such national research centres and to ensure a wide dissemination of their research outcomes.”

b) Directly countering disinformation

As proposed in the OECD report, governments could also undertake actions or develop services to directly respond to disinformation, e.g., debunking false claims that are potentially harmful to free elections and democracy in general, public health or national security.

This can involve direct communication with citizens through social media or the launch of targeted awareness campaigns, aiming to debunk disinformation that is perceived as posing some serious threat to the public, e.g., debunk disinformation with regard to the efficiency and dangers of Covid vaccines. To this end, an important step is for governments to develop toolkits and training material for government agencies or institutions.

Another response that according to the OECD report can be integrated with communication and awareness efforts

462 Human Rights Watch, “Germany: Flawed Social Media Law” (2018): <https://www.hrw.org/news/2018/02/14/germany-flawed-social-media-law>

463 Examples of such projects include the H2020 projects InVID, FANDANGO, WeVerify, Eunomia and Provenance.

is “pre-bunking”. Analogous to medical immunisation, research finds that “pre-emptively warning and exposing people to weakened doses of misinformation, can help cultivate “mental antibodies” against fake news.”⁴⁶⁴ This entails warning people about fake news and pre-emptively exposing them to arguments used by disinformation while also providing them accurate information that expose the flaws in these arguments.⁴⁶⁵ Another popular suggestion are policies that aim to foster collaboration at national, European or international level in order to co-ordinately counter disinformation and to exchange data, knowledge and best practices for better responses. For example, close cooperation and exchange of information is required to debunk coronavirus related disinformation, something that can be facilitated by tools like the Rapid Alert System. Similarly, cooperation with international organizations and other countries could help Europe address Russian disinformation on elections. But governments cannot become fact-checkers. This is why another recommendation is to support independent fact-checking organizations and the cooperation with them. Such cooperation is also beneficial for platforms, media and civil society organisations that wish to enhance their fact-checking capabilities.

7. The importance of collaboration among stakeholders

What is clear from the previous analysis is that multi-stakeholder cooperation is key to effectively combat disinformation. This is considered in several levels:

- Among media organisations but also between media and fact-checking organisations for more accurate, rapid and cost-efficient fact-checking.
- Between platforms and media to promote high-quality journalism and content.
- Between government, civil society, media, platforms and international organisations to design and launch effective media literacy initiatives.
- Between platforms and researchers (e.g. sharing of platform data) to study the phenomenon, develop new tools and services, and examine their efficiency.
- Between platforms and governments to co-create policies for platform regulation.
- Among national governments to exchange information, knowledge, skills and best practices to fight disinformation and coordinate global actions to combat disinformation as was the case of Covid.
- Between international organisations, governments and platforms to ensure that freedom of the press, expression and human rights in general are not violated by regulation or platform policies.

⁴⁶⁴ <https://misinforeview.hks.harvard.edu/article/global-vaccination-badnews/>

⁴⁶⁵ <https://www.frontiersin.org/articles/10.3389/fpsyg.2020.566790/full>

OUR RECOMMENDATIONS

So far, we presented some of the most important policy recommendation frameworks to combat disinformation proposed by European and international institutions. Then, we further analysed and synthesized their policy recommendations, based on a new disinformation policy classification framework that consists of six main pillars and several policy categories. In this section, we distil and present our recommendations for policy measures to efficiently address the phenomenon at the European level. The recommendations are again classified based on the above policy classification framework.

A) Policy measures to enhance transparency

Here, we present recommendations that aim to enhance the transparency of the digital media ecosystem. The proposed measures apply to online advertisement, political messaging and funding, algorithms and data, and content and content sources, and are addressed to platforms, media, advertisers, governments and political actors.

Funding and advertising

a) Platforms should adopt demonetisation policies that aim to make disinformation spreading an unprofitable business. This, for example, can include blacklists of sites that repeatedly promote disinformation, which are then excluded from advertisement-based funding.

b) Platforms and digital media should publicly share information about advertisement, especially political, disclosing who funds it, who receives the funding, and who is targeted and how. In the same vein, governments and the EC should adopt strict rules for transparency in political funding and advertising.

c) The EC should promote regulations restricting micro-targeting and psychological profiling of media users.

Algorithmic and data transparency

Platforms should share information about how their algorithms (e.g. recommender systems or newsfeeds) work, what data they collect and how they use it. They should also share data on disinformation and related actions. By sharing such information and data, platforms can help researchers and governments understand better the phenomenon and develop efficient tools to address it, while also empowering their users. If this information is not provided on a voluntary basis, the EC should consider regulation to mandate provision of such information by platforms.

Content quality indicators

Platforms, media and civil society should collaborate for the creation of a set of information quality labels (similar to nutritional labels) that will accompany all online content and sources, aiming to inform and warn users about the potential quality of the content they consume.

Fact-checking and verification

a) Media and platforms should heavily invest on fact-checking tools/services and pursue collaboration among them and with independent fact-checking organizations, to speed-up and coordinate fact-checking efforts.

b) Platforms should invest more on tools that detect new forms of audiovisual content manipulation (deepfake video or audio). The EC should consider funding research and industry consortia that pursue this kind of research.

Election integrity

a) The EC should require that member states increase transparency of political funding and advertising and regulate for the public disclosure of such information.

b) The EC should enhance existing mechanisms for collaboration between EU states and institutions, to exchange information and develop actions against foreign interference and disinformation in elections.

B) Policy measures to improve media literacy

Here, we present recommendations that aim to enhance media literacy in different groups of citizens and promote skills that will allow them to navigate the digital media environment with confidence and knowledge.

Media literacy in schools

Governments and academia should enhance school curricula to include media literacy courses. To this end, school ranking systems like PISA could be extended to include criteria for media literacy. In addition, the EC could consider using educational programmes like Erasmus for training teachers and journalism students.

Media literacy for all

a) Governments and civil society should collaborate to promote media literacy programs for all citizens, with emphasis on older people, vulnerable groups and minorities, and in general people who may be more susceptible to disinformation.

b) The EC should promote and support with funding such media literacy programmes on a member state level, also requiring member states to provide regular reporting on actions undertaken on this issue.

C) Policy measures to empower stakeholders

Here, we propose policies that aim to empower platform

users, citizens, and journalists. The recommendations aim to give platform users agency over their data and online experience, citizens a voice in online policy debate and access to reliable data, and journalists the necessary resources and knowledge to provide high-quality news.

User empowerment

a) Platforms should develop tools that will allow their users to better control access to information, e.g. by selecting the parameters of their newsfeeds and search results, by selecting to opt-out from advertisement, by exercising their right to reply and object moderation decisions, etc. The EC could also necessitate such user control features through regulation.

b) Platforms should enable a minimum amount of pluralism by default by including different views on some topics in their search results or presenting results from different independent sources.

Citizen empowerment

a) The EC and member states should consider establishing new or strengthening existing tools for deliberation that will allow EU citizens to express their opinions on policy matters, vote on policy actions, and assess enforced policies. Providing to citizens a sense of agency over decisions will strengthen their trust in EU institutions.

b) The EC should require that member states and EU institutions make open social, economic, scientific and other data for a variety of issues that concern citizens. This should be done regularly and on demand, e.g. disinformation about the efficiency of Covid vaccines.

c) The EC, member states and civil society are encouraged to launch information awareness campaigns to inform citizens about the disinformation phenomenon and its effects on European society and democracy. Also, to launch campaigns on selected topics that have the potential to cause harm on EU citizens (e.g. Covid).

d) The EC should fund research and development of open-source tools that help citizens tackle disinformation as they navigate the online world. This can be done through dedicated open calls, e.g. in Horizon Europe.

Journalists' empowerment

a) Media should invest in disinformation detection tools and training their journalists to detect disinformation and manipulated content. Training initiatives can be funded by government and civil society and realized in cooperation with journalism and media associations and fact-checker organisations.

b) The EC can fund media innovation projects by consortia of media organizations and ICT researchers, aiming to modernize newsrooms and exploit new capabilities offered by AI and big data technologies.

D) Policy measures to strengthen media independence and pluralism

Here, we propose policies that aim to strengthen media independence, pluralism and sustainability.

Strengthening freedom of the press

- a) The EC should create a supporting ecosystem for media to flourish, ensuring that member states do not intervene with editorial independence or limit in any way media's freedom of expression. Governments should be closely monitored by the EC and decisive action should be taken to address such interventions.
- b) Member states should avoid regulating disinformation to avoid censorship or restricting freedom of speech. Regulation should only be used for exceptional cases, e.g. content inciting to violence, hatred or discrimination, which should be made by the judiciary authority.
- c) The EC should require member states to legislate and create safeguards to prosecute and discourage abusive behavior against journalists.
- d) Member states should impose rules to limit horizontal concentration in traditional media markets to ensure sufficient diversity of voices in the media landscape.

Ensuring long-term sustainability of media

- a) The EC and member states should support quality and independent journalism, by funding EU or national journalism projects that develop innovative tools and use AI and big data against disinformation or do independent reporting on socio-economic or political issues.
- b) The EC should require that member states adopt transparent and fair processes for providing state aid and funds for state advertisement to media.

E) Policy measures to promote ethical conduct

Here, we propose recommendations that aim to promote ethical conduct of media, journalists and platforms. We offer recommendations for both self-regulation of media and platforms but also for government regulations.

Self-regulation of media & platforms

- a) Traditional media and journalists need to revisit, modernize and strengthen their ethical codes of conduct in order to adapt them to the new digital environment and the changes and dangers brought by the wide spread of the disinformation phenomenon. Strong enforcement of the codes will be a decisive step also towards repairing the public's trust to media.
- b) Following, the Guidance on Strengthening the Code of Practice on Disinformation,⁴⁶⁶ the EC needs to impose

stronger commitments to the signatories, a robust mechanism for monitoring compliance with them, and specific repercussions when signatories do not comply. A new aspect that could be introduced in the Code are commitments that would require platforms to take initiative against "gendered disinformation" targeted towards women and in favour of promoting a rewarding experience for all platform users, independent of gender. Platforms should also publish detailed reports on their efforts to meet the Code commitments and spread awareness among their users about the Code.

Government regulation

- a) The EC should build on and adapt or expand existing regulatory tools (e.g. for traditional media, advertisers, or financial markets) to regulate the online media ecosystem, setting rules on transparency, user rights, consumer privacy, competition, data processing, etc. Such initiatives are already underway with regulations such as the GDPR, DSA, and DMA but should be strengthened. Areas where legislation effort should concentrate include transparency with regard to platform algorithms, data, advertisement, moderation policies, restrictions in micro-targeting and psychological profiling of users, provision of tools for user empowerment, safeguards for data protection and privacy, limitations in the use of AI and automation (e.g. bots), portability of user data among platforms, etc.
- b) The EC should develop mechanisms to monitor member states' initiatives against disinformation and adherence with human rights to ensure that governments also behave ethically and do not abuse their power on grounds of the fight against disinformation.

F) Policy measures to counter disinformation

Here, we propose recommendations on how the EC and member states can directly fight disinformation.

Disinformation monitoring and research

- a) The EC should invest in multidisciplinary projects that analyse the disinformation phenomenon and its impact, examine the effectiveness of proposed solutions, and monitor relevant technical, social and economic developments both at the national and European level. These activities can build on the European Digital Media Observatory (EDMO).⁴⁶⁷
- b) The EC should invest in research projects that study the development of new technologies and tools to fight disinformation, especially focusing on audiovisual content manipulation and deepfakes, building on previous relevant successful projects.⁴⁶³

⁴⁶⁶ <https://digital-strategy.ec.europa.eu/en/library/guidance-strengthening-code-practice-disinformation>

⁴⁶⁷ European Digital Media Observatory: <https://edmo.eu/>

c) The EC should promote and fund the establishment of a network of European Centres for Research on Disinformation, proposed by the HLEG report. Close collaboration should be established between this network of centres and the EDMO.

d) The EC should regulate on platforms sharing data on disinformation with the research community to facilitate both study of the phenomenon and also the development of appropriate tools to address it.

Direct countering of disinformation

a) Member states and also relevant EU institutions should develop communication toolkits and training material to help government agencies or institutions identify and respond to disinformation.

b) The EC should exploit the EDMO and the EU vs. Disinfo platform to monitor disinformation phenomena across Europe and provide alerts when some disinformation campaign is perceived as posing a serious threat to EU citizens, e.g. health-related, eroding trust to elections, etc. In this case, the EU and Member states with the help of the Observatory and other relevant EU and national institutions could launch communication campaigns to pre-bunk or de-bunk disinformation and inform/educate citizens. Special effort should be dedicated towards developing efficient pre-bunking campaigns to more effectively immunise EU citizens against disinformation.

Collaboration among stakeholders

a) The EC should foster an environment of collaboration among EU and national institutions and authorities but also international institutions in order to exchange data, knowledge and best practices for better responses but also to coordinate against common threats. This is particularly relevant to disinformation attacks against EU

countries by adversaries like Russia or China, where robust coordinated EU action on different levels (social, economic, political, security, etc.) is necessary.

b) The connections of the EDMO with independent fact-checking organisations should be strengthened and leveraged to improve the capabilities of the EU to monitor the evolving disinformation landscape and reacting to disinformation risks timely.

c) The EC should pursue collaboration with major social media platforms to co-create efficient and commonly acceptable policies for platform regulation but also to exchange research data that will allow all parties to better study the phenomenon, develop new tools and services against disinformation, and assess their efficiency.

G) Recommendations to political parties and actors

Here, we move a step beyond the dimensions of the proposed disinformation framework, to provide some recommendations to political parties and actors.

a) European political parties should establish internal codes of conduct on disinformation, discouraging their representatives from spreading disinformation and penalising or imposing sanctions to those who do.

b) European political parties should be transparent about their own funding (who funds them and how) and also about the funding they spent on advertisement on traditional and digital media.

c) European political parties should adopt deliberation tools that will allow their members but also the wider public to debate policy issues and communicate with the party leadership to co-create the party's agenda.

d) European political and social actors should collaborate with EU institutions in promoting media literacy and awareness campaigns against disinformation.

CODES OF CONDUCT – EUROPE

EUROPEAN REGULATORS GROUP FOR AUDIOVISUAL MEDIA

Code of practice on disinformation - II. Commitments

II.A. Scrutiny of ad placements

Whereas:

- The Signatories recognise the objectives outlined in the Communication, and bearing in mind that the commercial aspect is only one of the many facets of Disinformation, the Signatories acknowledge the need to "significantly improve the scrutiny of advertisement placements, notably in order to reduce revenues of the purveyors of Disinformation".
- Relevant Signatories will use commercially reasonable efforts to implement policies and processes; not to accept remuneration from, or otherwise promote accounts and websites which consistently misrepresent information about themselves.
- The Signatories recognise that all parties involved in the buying and selling of online advertising and the provision of advertising-related services need to work together to improve transparency across the online advertising ecosystem and thereby to effectively scrutinise, control and limit the placement of advertising on accounts and websites belonging to purveyors of Disinformation.
- Avoiding the misplacement of advertising on online Disinformation sites requires further refinement of already widely used brand safety tools to successfully continue to meet this challenge, in recognition of the nature of this content.
- The signatories recognise that indicators of trustworthiness and information from fact checking organizations and the new independent network of fact checkers facilitated by the European Commission upon its establishment can provide additional data points on purveyors of disinformation.

Therefore, the Signatories of this Code commit to the following:

1. Relevant Signatories commit to deploy policies and processes to disrupt advertising and monetization incentives for relevant behaviours, such as misrepresenting material information about oneself or the purpose of one's properties. These policies and processes can include, for example, the restriction of advertising services or limiting paid placements, and could potentially take place in partnership with fact-checking organizations. Such policies and processes may, as appropriate:
 - a. Promote and/or include the use of brand safety and verification tools.
 - b. Enable engagement with third party verification companies.
 - c. Assist and/or allow advertisers to assess media buying strategies and online reputational risks.
 - d. Provide advertisers with necessary access to client-specific accounts to help enable them to monitor the placement of ads and make choices regarding where ads are placed.

II.B. Political advertising and issue-based advertising

Whereas:

- The Signatories acknowledge the Communication's call to recognise the importance of ensuring transparency about political and issue-based advertising.
- Such transparency should be ensured also with a view to enabling users to understand why they have been targeted by a given advertisement
- Signatories recognize that approaches to issue-based advertising developed should be reflective of the European market for political and issue-based advertising, and take note of the European Commission Recommendation on election cooperation networks, online transparency, protection against cybersecurity incidents and fighting disinformation campaigns in the context of elections to the European Parliament

Therefore, the Signatories of this Code commit to the following:

2. Signatories commit to keep complying with the requirements set by EU and national laws, and outlined in self-regulatory Codes, that all advertisements should be clearly distinguishable from editorial content, including news, whatever their form and whatever the medium used. When an advertisement appears in a medium containing news or editorial matter, it should be presented in such a way as to be readily recognisable as a paid-for communication or labelled as such.
3. Relevant Signatories commit to enable public disclosure of political advertising (defined as advertisements advocating for or against the election of a candidate or passage of referenda in national and European elections), which could include actual sponsor identity and amounts spent.
4. Relevant Signatories commit to use reasonable efforts towards devising approaches to publicly disclose "issue-based advertising". Such efforts will include the development of a working definition of "issue-based advertising" which does not limit reporting on political discussion and the publishing of political opinion and excludes commercial advertising. Given the implications related to freedom of expression, Signatories encourage engagement with expert stakeholders to explore approaches that both achieve transparency but also uphold fundamental rights. The work to develop this definition shall not interfere with the areas covered by advertising self-regulatory organisations.

II.C. Integrity of services

Whereas:

- In line with the European Commission Communication, the Signatories recognise "the importance of intensifying and demonstrating the effectiveness of efforts to close fake accounts" as well as the importance of establishing "clear marking systems and rules for bots to ensure their activities cannot be confused with human interactions".
- Relevant Signatories recognise the importance of ensuring that online services include and promote safeguards against Disinformation.
- Relevant Signatories underline an ongoing commitment that, before launching new services, they consider implementing and promoting safeguards against misrepresentation.
- Relevant Signatories consider reviewing existing services to ensure that such safeguards are likewise implemented, to the extent possible.
- Relevant Signatories should intensify and demonstrate the effectiveness of efforts to ensure the integrity of services with regards to accounts whose purpose and intent is to spread Disinformation whose specifics should be assessed and determined by the Relevant Signatory.-Consistently with Article 8 of the European Convention on Human Rights,Signatories should not be prohibited from enabling anonymous or pseudonymous use of accounts and services.

Therefore, the Signatories of this Code commit to the following:

5. Relevant Signatories commit to put in place clear policies regarding identity and the misuse of automated bots on their services and to enforce these policies within the EU.
6. Relevant Signatories commit to put in place policies on what constitutes impermissible use of automated systems and to make this policy publicly available on the platform and accessible to EU users.

II.D. Empowering consumers

Whereas:

- Consistently with Article 10 of the European Convention on Human Rights and the principle of freedom of opinion, Signatories should not be compelled by governments, nor should they adopt voluntary policies, to delete or prevent access to otherwise lawful content or messages solely on the basis that they are thought to be "false".
- The Signatories of this Code recognise the importance of diluting the visibility of Disinformation by improving the findability of trustworthy content and consider that users should be empowered with tools enabling a customized and interactive online experience so as to facilitate content discovery and access to different news sources representing alternative viewpoints, and should be provided with easily accessible tools to report Disinformation, as referred to in the Communication.
- Relevant Signatories should invest in technological means to prioritize relevant, authentic, and authoritative information where appropriate in search, feeds, or other automatically ranked distribution channels.
- The Signatories of this Code recognise that transparency should be ensured with a view to enabling users to understand why they have been targeted by a given political or issue-based advertisement.
- Such transparency should reflect the importance of facilitating the assessment of content through indicators of the

trustworthiness of content sources, media ownership and verified identity. These indicators should be based on objective criteria and endorsed by news media associations, in line with journalistic principles and processes.

- The signatories recognise the ongoing legislative work to develop standards for transparency about the main parameters of ranking included in the draft Platform to Business Regulation as well as the work being carried out by the EU Artificial Intelligence Expert Group as well as the EU consumer acquis.

Therefore, the Signatories of this Code commit to the following:

7. Relevant Signatories commit to invest in products, technologies and programs such as those referred to in Annex 2 to help people make informed decisions when they encounter online news that may be false, including by supporting efforts to develop and implement effective indicators of trustworthiness in collaboration with the news ecosystem.
8. Relevant Signatories commit to invest in technological means to prioritize relevant, authentic and authoritative information where appropriate in search, feeds, or other automatically ranked distribution channels.
9. Relevant Signatories commit to invest in features and tools that make it easier for people to find diverse perspectives about topics of public interest.
10. Signatories commit to partner with civil society, governments, additional institutions, and other stakeholders to support efforts aimed at improving critical thinking and digital media literacy.
11. Signatories commit to encourage market uptake of tools that help consumers understand why they are seeing particular advertisements.

II.E. Empowering the research community

Whereas:

- In line with the HLEG Report and the Communication, the Signatories of this Code acknowledge the importance to "take the necessary measures to enable privacy-compliant access to data for fact-checking and research activities" and to "cooperate by providing relevant data on the functioning of their services, including data for independent investigation by academic researchers and general information on algorithms."

Therefore, the Signatories of this Code commit to the following:

12. Relevant Signatories commit to support good faith independent efforts to track Disinformation and understand its impact, including the independent network of fact-checkers facilitated by the European Commission upon its establishment. This will include sharing privacy protected datasets, undertaking joint research, or otherwise partnering with academics and civil society organizations if relevant and possible.
13. Relevant Signatories commit not to prohibit or discourage good faith research into Disinformation and political advertising on their platforms.
14. Relevant Signatories commit to encourage research into Disinformation and political advertising.
15. Relevant Signatories commit to convene an annual event to foster discussions within academia, the fact-checking community and members of the value chain.

INTERNATIONAL FEDERATION OF JOURNALISTS

[IFJ Declaration of Principles on the Conduct of Journalists](#)

"This international Declaration is proclaimed as a standard of professional conduct for journalists engaged in gathering, transmitting, disseminating and commenting on news and information in describing events."

1. Respect for truth and for the right of the public to truth is the first duty of the journalist.
2. In pursuance of this duty, the journalist shall at all times defend the principles of freedom in the honest collection and publication of news, and of the right of fair comment and criticism.
3. The journalist shall report only in accordance with facts of which he/she knows the origin. The journalist shall not suppress essential information or falsify documents.
4. The journalist shall use only fair methods to obtain information, images, documents and data and he/she will always report his/her status as a journalist and will refrain from using hidden recordings of images and sounds, except where it is impossible for him/her to collect information that is overwhelmingly in the public interest. He/she will demand free access to all sources of information and the right to freely investigate all facts of public interest.
5. The notion of urgency or immediacy in the dissemination of information shall not take precedence over the verification of facts, sources and/or the offer of a reply.
6. The journalist shall do the utmost to rectify any published information which is found to be harmfully inaccurate.
7. The journalist shall observe professional secrecy regarding the source of information obtained in confidence.

8. The journalist will respect privacy. He/she shall respect the dignity of the persons named and/or represented and inform the interviewee whether the conversation and other material is intended for publication. He/she shall show particular consideration to inexperienced and vulnerable interviewees.
9. Journalists shall ensure that the dissemination of information or opinion does not contribute to hatred or prejudice and shall do their utmost to avoid facilitating the spread of discrimination on grounds such as geographical, social or ethnic origin, race, gender, sexual orientation, language, religion, disability, political and other opinions.
10. The journalist will consider serious professional misconduct to be plagiarism, distortion of facts and slander, libel, defamation, unfounded accusations
11. The journalist shall refrain from acting as an auxiliary of the police or other security services. He/she will only be required to provide information already published in a media outlet.
12. The journalist will show solidarity with his/her colleagues, without renouncing his/her freedom of investigation, duty to inform, and right to engage in criticism, commentary, satire and editorial choice.
13. The journalist shall not use the freedom of the press to serve any other interest and shall refrain from receiving any unfair advantage or personal gain because of the dissemination or non-dissemination of information. He/she will avoid - or put an end to - any situation that could lead him/her to a conflict of interest in the exercise of his/her profession. He/she will avoid any confusion between his activity and that of advertising or propaganda. He/she will refrain from any form of insider trading and market manipulation.
14. The journalist will not undertake any activity or engagement likely to put his/her independence in danger. He/she will, however, respect the methods of collection/dissemination of information that he / she has freely accepted, such as "off the record", anonymity, or embargo, provided that these commitments are clear and unquestionable.
15. Journalists worthy of the name shall deem it their duty to observe faithfully the principles stated above. They may not be compelled to perform a professional act or to express an opinion that is contrary to his/her professional conviction or conscience.
16. Within the general law of each country the journalist shall recognize in matters of professional honour, the jurisdiction of independent self-regulatory bodies open to the public, to the exclusion of every kind of interference by governments or others.

EUROPEAN FEDERATION OF JOURNALISTS

EFJ members have to follow the same principles as the members of IFJ.

INTERNATIONAL FACT-CHECKING NETWORK

Code of principles

The code of principles is for organizations that regularly publish nonpartisan reports on the accuracy of statements by public figures, major institutions, and other widely circulated claims of interest to society. It is the result of consultations among fact-checkers from around the world and offers conscientious practitioners principles to aspire to in their everyday work.

1. A COMMITMENT TO NONPARTISANSHIP AND FAIRNESS

We fact-check claims using the same standard for every fact check. We do not concentrate our fact-checking on any one side. We follow the same process for every fact check and let the evidence dictate our conclusions. We do not advocate or take policy positions on the issues we fact-check.

2. A COMMITMENT TO TRANSPARENCY OF SOURCES

We want our readers to be able to verify our findings themselves. We provide all sources in enough detail that readers can replicate our work, except in cases where a source's personal security could be compromised. In such cases, we provide as much detail as possible.

3. A COMMITMENT TO TRANSPARENCY OF FUNDING & ORGANIZATION

We are transparent about our funding sources. If we accept funding from other organizations, we ensure that funders have no influence over the conclusions we reach in our reports. We detail the professional background of all key figures in our organization and explain our organizational structure and legal status. We clearly indicate a way for readers to communicate with us.

4. A COMMITMENT TO TRANSPARENCY OF METHODOLOGY

We explain the methodology we use to select, research, write, edit, publish and correct our fact checks. We encourage readers to send us claims to fact-check and are transparent on why and how we fact-check.

5. A COMMITMENT TO OPEN AND HONEST CORRECTIONS

We publish our corrections policy and follow it scrupulously. We correct clearly and transparently in line with our corrections

policy, seeking so far as possible to ensure that readers see the corrected version.

ETHICAL JOURNALISM NETWORK

Principles of ethical journalism

1. Truth & Accuracy

Journalists cannot always guarantee 'truth', but getting the facts right is the cardinal principle of journalism. We should always strive for accuracy, give all the relevant facts we have and ensure that they have been checked. When we cannot corroborate information we should say so.

2. Independence

Journalists must be independent voices; we should not act, formally or informally, on behalf of special interests whether political, corporate or cultural. We should declare to our editors – or the audience – any of our political affiliations, financial arrangements or other personal information that might constitute a conflict of interest.

3. Fairness and Impartiality

Most stories have at least two sides. While there is no obligation to present every side in every piece, stories should be balanced and add context. Objectivity is not always possible, and may not always be desirable (in the face for example of brutality or inhumanity), but impartial reporting builds trust and confidence.

4. Humanity

Journalists should do no harm. What we publish or broadcast may be hurtful, but we should be aware of the impact of our words and images on the lives of others.

5. Accountability

A sure sign of professionalism and responsible journalism is the ability to hold ourselves accountable. When we commit errors we must correct them and our expressions of regret must be sincere not cynical. We listen to the concerns of our audience. We may not change what readers write or say but we will always provide remedies when we are unfair.

EUROPEAN CENTRE FOR PRESS AND MEDIA FREEDOM (ECPMF)

European charter on Freedom of the Press

Article 1: Freedom of the press is essential to a democratic society. To uphold and protect it, and to respect its diversity and its political, social and cultural missions, is the mandate of all governments.

Article 2: Censorship is impermissible. Independent journalism in all media is free of persecution and repression, without a guarantee of political or regulatory interference by government. Press and online media shall not be subject to state licensing.

Article 3: The right of journalists and media to gather and disseminate information and opinions must not be threatened, restricted or made subject to punishment.

Article 4: The protection of journalistic sources shall be strictly upheld. Surveillance of, electronic eavesdropping on or searches of newsrooms, private rooms or journalists' computers with the aim of identifying sources of information or infringing on editorial confidentiality are unacceptable.

Article 5: All states must ensure that the media have the full protection of the law and the authorities while carrying out their role. This applies in particular to defending journalists and their employees from harassment and/or physical attack. Threats to or violations of these rights must be carefully investigated and punished by the judiciary.

Article 6: The economic livelihood of the media must not be endangered by the state or by state-controlled institutions. The threat of economic sanctions is also unacceptable. Private-sector companies must respect the journalistic freedom of the media. They shall neither exert pressure on journalistic content nor attempt to mix commercial content with journalistic content.

Article 7: State or state-controlled institutions shall not hinder the freedom of access of the media and journalists to information. They have a duty to support them in their mandate to provide information.

Article 8: Media and journalists have a right to unimpeded access to all news and information sources, including those from abroad. For their reporting, foreign journalists should be provided with visas, accreditation and other required documents without delay.

Article 9: The public of any state shall be granted free access to all national and foreign media and sources of information.

Article 10: The government shall not restrict entry into the profession of journalism.

CODES OF CONDUCT – NATIONAL

GREECE

Preamble

The Code of Professional Ethics and Social Responsibility of the Greek journalists has the following objectives:

- To reaffirm and ensure the social role of the journalist in the new conditions which are formed by gigantism, oligarchy in the ownership status quo, the increased range and influence of the mass media and the globalization of communication.
- To discourage and to resist any attempt of state or other party to influence self-determination in standards of responsible professional functioning.
- To ensure freedom of information and expression, the autonomy and dignity of the journalist, and to defend freedom as part of democracy and society.

For this purpose, journalists commit themselves to applying and defend the following fundamental principles:

Article 1

It is the inalienable right of man and citizen to inform and to be informed freely. Information is a public good and not a commodity or means of propaganda.

The journalist is competent and obliged:

1. To consider the publication of the whole truth as his foremost duty towards society and himself.
2. To consider distortion, concealment, falsification and fabrication of real events as both an offence against society and a self-degrading act.
3. To respect and uphold the distinction between news, commentary and advertising messages, the necessary correlation between title and text, and the accurate use of photographs, images, graphic depictions and other representations.
4. To convey information and news without being influenced by his personal political, social, religious, racial or cultural views and convictions.
5. To investigate in advance, with a sense of responsibility and recognition of the consequences, the accuracy of the information and news which he is to report.
6. To redress without delay, through analogous presentation and suitable accentuation, inaccurate information and false assertions which impugn the honour and reputation of man and citizen, and to print or present the opposite view, without necessarily a rejoinder which would place such in a preferential position to the injured party.

Article 2

Journalism as a profession, but also as a social service, entails rights, duties and obligations.

The journalist is competent and obliged:

- 1) To address citizens equally, without distinction of national origin, sex, race, religion, political views, economic situation or social position.
- 2) To respect the individuality, dignity and inviolable privacy of man and citizen. Only when requisite can the right to information entail, and always in a responsible manner, elements of the personal lives of individuals who occupy public office or who hold a particular position and influence in society and are subject to social scrutiny.
- 3) To respect the presumption of innocence and to not anticipate judicial decisions.
- 4) To respect the protection provided for by international conventions of minors and individuals with special needs and serious health problems.
- 5) To address citizens with discretion and sensitivity when they are in situations of grief, psychological shock and pain, as well as those who have manifest psychological problems, avoiding projection of their personal particularity.
- 6) Not to reveal, either directly or indirectly, the identity of rape victims who survived the criminal act.
- 7) To supervise and substantiate information which refers to sensitive areas of health, where misleading information and sensational projection can provoke unjustified agitation in public opinion.

- 8) To gather and crosscheck information and to ensure its substantiation (writing, photographs, cassettes, television images) through journalistically legitimate methods, always disclosing their journalistic origin.
- 9) To adhere to professional discretion as to the source of information which has been obtained in confidence.
- 10) To respect the standards of off-the-record information which has been pledged as such.

Article 3

Equality in human rights and pluralism, the lifeblood of democracy, are discredited by conditions of state monopolistic control of the mass media, and are undermined by the concentration of their ownership in the hands of gigantic profiteering enterprises which confront public opinion as being the consumer whose views, habits and behaviour by and large, they seek to guide.

For this reason, the journalist is competent and obliged:

- 11) To vigorously defend the democratic constitution, which ensures a free press and the unobstructed exercise of the journalistic profession.
- 12) To reject and condemn manifestations of state authoritarianism and the arbitrariness of mass media proprietors, especially that of oligopolies.
- 13) To defend the journalist's independence in his workplace, and to refuse to carry out an assignment which is contrary to the principles of journalistic ethics.
- 14) To refuse to edit news, commentary, article or broadcast production under intimidation by his seniors or editor, if their content does not correspond to reality; and to condemn falsifications and distortions, unbeknown to him, of his journalistic production.

Article 4

The surplus of labour in the area of journalism accentuates the preconditions for the manifestation of exploitative phenomena, namely: unsalaried or symbolically rewarded labour, the violation of standard obligations and codes of ethics etc.

For this reason, the journalist is competent and obliged:

- 15) To support and strengthen the activities of his union organization which aim at the improvement of the terms of salary and employment in the mass media.
- 16) To reject any attempt at reduction of workers' rights in the workplace and any violation of ethical standards.
- 17) To neither exercise nor accept any form of differentiation whatsoever based upon the sex or years of his colleagues in the profession.

Article 5

Transparency in financial relationships constitutes a fundamental element of the credibility, prestige and professional dignity of the journalist who is obliged:

- 18) To neither pursue nor accept rewards from private appropriations of state departments and public or private organizations for his journalistic work.
- 19) To neither pursue nor accept sinecure or a rewarded position related to his specialty in the press office, public services or private enterprises, which cast doubt on his professional autonomy and impartiality.
- 20) To neither pursue nor accept the promotional use of his name, voice or image, except for purposes of public benefit.
- 21) To neither report nor self-interestedly utilize exclusive information which influences the course of stock exchange values and the market.
- 22) To neither pursue nor accept any financial or material bonus whatsoever which compromises his credibility and dignity and which influences his independence and impartiality.

Article 6

Solidarity among colleagues and the mutual respect of journalists contribute positively to the collective professional objectives and to the common image of the journalistic profession.

For this reason, the journalist is obliged:

- 23) To respect the individuality of his colleagues. To not level unwarranted accusations against them, and to avoid personal recriminations both publicly and in the workplace.
- 24) To consider any plagiarism to be a grave and unprofessional act.
- 25) Not to appropriate the work of his colleagues. To always refer to the name of the author whose texts or extracts are

used.

26) To note the source of information which has already been published or reported.

Article 7

The gigantism of the mass media and the globalization of communications significantly increase the educational and cultural role of the electronic and printed press. With the additional responsibilities of the new conditions, the journalist is obliged:

27) To contribute to the re-evaluation of the journalistic word, avoiding grammatical, syntactic and semantic violations.

28) To avoid vulgarisms, vulgarity and linguistic barbarity, observing, even in satire and caricature, the standards of professional ethics and social responsibility.

29) To protect the Greek language from the excessive use of foreign words and terms.

30) To creatively contribute to the protection of our national tradition and to the security of our cultural heritage.

Article 8

The obligations of journalists, which are derived from the Code do not constitute a limitation to freedom of expression. Violations of these obligations will be examined by the Disciplinary Committees of the Unions, until the Articles of the Panhellenic Federation of Journalists' Unions (POESY) are amended.

GERMANY

Drawn up by the German Press Council in collaboration with the Press associations and presented to Federal President Gustav W. Heinemann on December 12, 1973 in Bonn.

(Updated version of September 13, 2006)⁴⁶⁸

Preamble

The freedom of the Press enshrined in the Basic Law includes the independence and freedom of information, the right of expression and criticism. Publishers, editors and journalists must in their work remain aware of their responsibility towards the public and their duty to uphold the prestige of the Press. They perform their journalistic task fairly, according to the best of their knowledge and belief, uninfluenced by personal interests and motives that have nothing to do with the matter in hand.

The journalistic principles define the professional ethics of the Press. These include the duty within the framework of the Constitution and constitutional laws to maintain the standing of the Press and speak up for the freedom of the Press.

The regulations pertaining to editorial data protection apply to the Press in gathering, processing or using information about persons for journalistic-editorial purposes. From research to editing, publishing, documenting and storing these data, the Press must respect people's privacy and right to self-determination on information about them.

These professional ethics give everyone the right to complain about the Press. Complaints are justified if professional ethics are infringed.

This preamble is part of the ethical standards.

Section 1 - Truthfulness and Preserving Human Dignity

Respect for the truth, preservation of human dignity and accurate informing of the public are the overriding principles of the Press. In this way, every person active in the Press preserves the standing and credibility of the media.

Section 2 - Care

Research is an indispensable instrument of journalistic due diligence. The publication of specific information in word, picture and graphics must be carefully checked in respect of accuracy in the light of existing circumstances. Its sense must not be distorted or falsified by editing, title or picture captions. Unconfirmed reports, rumours or assumptions must be quoted as such. Symbolic photos must be clearly marked as such.

Section 3 - Corrections

Published news or assertions, in particular those of a personal nature, which subsequently turn out to be incorrect must be promptly rectified in an appropriate manner by the publication concerned.

Section 4 - Limits of Research

Dishonest methods must not be used to acquire person-related news, information or photographs.

Section 5 - Professional Secrecy

The Press shall respect professional secrecy, make use of the right to refuse to bear witness and shall not reveal informants'

⁴⁶⁸ <https://accountablejournalism.org/ethics-codes/Germany-Press-Council>

identities without their explicit permission. Confidentiality is to be adhered to in principle.

Section 6 - Separation of Activities

Journalists and publishers shall not perform any activities that could throw doubt over the credibility of the Press.

Section 7 - Separation of Advertising and Editorial Content

The responsibility of the Press towards the general public requires that editorial publications are not influenced by the private or business interests of third parties or the personal economic interests of the journalists. Publishers and editors must reject any attempts of this nature and make a clear distinction between editorial and commercial content. If a publication concerns the publisher's own interests, this must be clearly identifiable.

Section 8 - The Rights of the Individual

The Press shall respect the private life and intimate sphere of persons. If, however, the private behaviour of a person touches upon public interests, then it may be reported on in individual cases. Care must be taken to ensure that the privacy rights of uninvolved persons are not violated. The Press shall respect people's right to self-determination on information about them and guarantee editorial data protection.

Section 9 - Protection of Dignity

Violating people's dignity with inappropriate representations in word and image contradicts journalistic ethics.

Section 10 - Religion, Philosophy, Custom

The Press will refrain from vituperating against religious, philosophical or moral convictions.

Section 11 - Sensational Reporting, the Protection of Young People

The Press will refrain from inappropriately sensational portrayal of violence, brutality and suffering. The Press shall respect the protection of young people.

Section 12 - Discrimination

There must be no discrimination against a person because of his/her sex, a disability or his membership of an ethnic, religious, social or national group.

Section 13 - Presumption of Innocence

Reports on investigations, criminal court proceedings and other formal procedures must be free from prejudice. The principle of the presumption of innocence also applies to the Press.

Section 14 - Medical Reporting

Reports on medical matters should not be of an unnecessarily sensationalist nature since they might lead to unfounded hopes or fears on the part of some readers. Research findings that are still at an early stage should not be portrayed as if they were conclusive or almost conclusive.

Section 15 - Preferential Treatment

The acceptance of privileges of any kind that could possibly influence the freedom of decision on the part of publishers and editors are irreconcilable with the prestige, independence and responsibilities of the Press. Anyone accepting bribes for the dissemination of news acts in a dishonorable and unprofessional manner.

Section 16 - Publication of Reprimands

It is considered fair reporting when a public reprimand issued by the German Press Council is published, especially by the newspapers or magazines concerned.

FRANCE

National Union of French Journalists Charter of the Professional Duties of Journalists⁴⁶⁹

A journalist worthy of the name:

- 31) Assumes responsibility for all that he writes.
- 32) Considers slander, unfounded accusations, alteration of documents, distortion of facts, and lying to be the most serious professional misconduct.
- 33) Recognizes the jurisdiction of his colleagues as the only one which is sovereign in matters of professional honour.
- 34) Accepts only such assignments that are compatible with his professional dignity.
- 35) Declines to invoke an imaginary title of quality, use dishonest means to obtain information or take advantage of the good faith of anybody.
- 36) Does not accept money in a public service or a private enterprise where his status as a journalist, his influence and his connections may be exploited.

⁴⁶⁹ <https://accountablejournalism.org/ethics-codes/France-Charter>

- 37) Does not sign articles which are commercial or financial advertising
- 38) Does not commit any plagiarism.
- 39) Does not claim the position held by another colleague nor cause him to be dismissed by offering to work under inferior conditions.
- 40) Respects professional secrecy.
- 41) Does not make use of the freedom of the press with profit-seeking intentions.
- 42) Demands the freedom to honestly publish his information.
- 43) Respects justice and gives it top priority.
- 44) Does not confuse his role with that of a policeman.

(Adopted by the National Union of French Journalists in 1918 and revised and completed by the union (SNJ) in 1938).

SPAIN

Deontological Code for the Journalistic Profession⁴⁷⁰

Country: Spain

Adopted by Federaration of the Spanish Press in Sevilla on 28 November 1993 and [updated in 2017](#).

PREAMBLE

In the framework of the civil rights, enshrined in the Constitution and which form the basis of a wholly democratic society, journalism is an important social tool which puts into effect the free and efficient development of the fundamental rights of all citizens to freedom of information and the freedom to express one's opinions.

As subjects and as instruments of the freedom of expression, journalists acknowledge and guarantee that journalism is the basis from which public opinion manifests itself freely in the pluralism of a democratic state governed by the rule of law.

However, journalists also take into consideration that when their profession uses their constitutional rights for the freedom of the expression and the right to information, their conduct is subject to limitations, which prevent the violation of other fundamental rights.

Therefore, when taking on these obligations, and as a true guarantee which a journalist offers to Spanish society, which he/she serves, journalists understand that they must maintain, collectively or individually, irreproachable conduct when it comes to the ethics and deontology of information.

In this sense, the journalists which form part of the Federation of the Press Associations of Spain (Federacion de Asociaciones de la Prensa de Espana – FAPE) commit themselves to maintain the binding ethic principles when exercising their profession. The general assembly of the FAPE declares the following principles and binding norms for the journalistic profession:

I. GENERAL PRINCIPLES

1. A journalist shall always act keeping in mind the principles of professionalism and the ethics of this Code. A journalist must express his/her approval of these principles to be able to join the professional register of journalists and the federal associations of the press.

Those, who after joining the register and the corresponding association act in a way which is not compatible with these principles, shall incur to assumptions contemplated in these regulations.

2. The first obligation of a journalist is to respect the truth.

3. In agreement with this principle a journalist shall always defend the principle of the freedom to investigate and honestly disseminate information as well as the freedom to comment and to criticise.

4. Without violating the right of the citizens to be informed, the journalist shall respect the right of individuals to privacy keeping in mind that:

- a) Only the defence of public interest justifies interfering with or investigating the private life of a person without his/her prior consent.
- b) When dealing with issues which may cause or imply pain or sorrow in the persons in question, a journalist shall avoid rude interference and unnecessary speculations about their feelings and circumstances.
- c) The restrictions concerning privacy must be taken into special consideration when dealing with persons in hospitals or in similar institutions.
- d) Special attention shall be paid to the treatment of issues which concern children and youth. The right of privacy of minors shall be respected.

5. A journalist must maintain the principle that a person is presumed innocent until proven otherwise and he/she must

⁴⁷⁰ <https://research.tuni.fi/ethicnet/country/spain/deontological-code-for-the-journalistic-profession/>

avoid, as much as possible, causing any harm in practising his profession. This kind of criterion is especially important when dealing with issues which are brought to the knowledge of the courts of law.

- a) A journalist must avoid mentioning the names of relatives and friends of persons accused of or sentenced for a crime, unless it is absolutely necessary in order to make the information complete and equal.
- b) Mentioning the names of the victims of crimes, as well as publishing material which may contribute to the identification of the victim, shall be avoided. The journalist shall act with special care when handling issues which deal with sexual crime.

6. The criteria indicated in the two former principles shall be applied with extreme strictness when the information concerns minors. Particularly, a journalist must refrain from interviewing, photographing or taping minors on themes related to criminal activities or on private matters.

7. A journalist shall exercise extreme professional caution in respecting the rights of the weak and discriminated. Therefore, discriminating information or opinions or such information or opinions which incite to violence or to inhuman or humiliating practices, must be handled with special sensitivity.

- a) One must, therefore, avoid alluding in a pejorative manner or with prejudice to the race, colour, religion, social class or sex of a person, or to whatever sickness, physical or mental handicap he/she might have.
- b) One must also avoid publishing such data, unless it is directly related to the issue being published.
- c) Finally, one must generally avoid unkind or hurtful expressions or statements on the personal condition of individuals or on their physical or moral integrity.

II. STATUTE

8. To guarantee the necessary independence and fairness in carrying out his/her profession, the journalist must claim for himself and for the people working for him/her:

- a) The right to appropriate working conditions, as it refers to earnings, as well as to the material and professional circumstances in which he/ she must carry out his/her tasks.
- b) The obligation and right to oppose any evident intention to monopolize or oligopolize information which might hinder political and social pluralism.
- c) The obligation and right to participate in matters of the journalistic enterprise in order to guarantee his/her freedom of information in a way which is compatible with the rights of the media in which he/she is expressing this freedom.
- d) The right to invoke the clause of conscience, when the media on which he/she depends on proposes a moral attitude which offends his/her professional dignity or which substantially modifies the editorial policy
- e) The right and obligation to professional training which is up-to-date and complete.

9. A journalist has the right to be protected by his or her own institution as well as by the associative or institutional organizations against those who, by any kind of pressure, try to divert him/her from the standard way of conduct defined in this Code.

10. The right to keep professional secrecy is a right of a journalist, but it is also an obligation which guarantees the confidentiality of the sources of information.

Therefore, a journalist shall guarantee the right of the sources of information to remain anonymous, if such has been requested. However, this professional obligation shall exceptionally not be applied if it has been proved that the source has deliberately falsified information or if revealing the source is the only way to avoid serious and instant damage to people.

11. A journalist scrupulously sees that the public administration fulfils its duty for the transparency of information. In particular, he/she shall always defend the free access to information which comes from or is produced by public administration, and the free access to public archives and administrative registers.

12. A journalist shall respect and shall make others respect the rights of the author which derive from all creative activity.

III. PRINCIPLES OF ACTION

13. The commitment to seek the truth means that a journalist always informs about facts whose origins he/she knows, he/she does not falsify documents nor does he/she leave out essential information, he/she does not publish information which is false, misleading or distorted. Consequently:

- a) The foundations of the information to be disseminated must be diligently laid, which means that a journalist must contrast the sources and he/she must give a person affected an opportunity to tell his/her own version of the facts.
- b) When known to have spread information which is false, misleading or distorted, a journalist shall be obliged to correct the error as quickly as possible using the same typographic and/or audiovisual form which was used to publish it. He/she shall also publicise apologies through his/her media, when proper.

- c) Consequently, a journalist must allow physical or legal persons an opportunity to correct inaccuracies in the way indicated in the former paragraph, without them having to have recourse to the law.

14. In practising his/her profession, a journalist must use appropriate means to obtain information, which excludes illegal procedures.

15. A journalist acknowledges and respects the right of physical and legal persons not to give out information and not to answer the questions which are asked without violating the right of the citizens to be informed.

16. With the same exceptions which apply to the professional secrecy, a journalist shall respect the “off the record” when it has been explicitly called for or it is thought that such was the intention of the informant.

17. A journalist shall always draw a clear and unmistakable distinction between the facts which he/she tells and what may be opinions, interpretations or surmises, although, in his/her professional activities he/she is not obliged to be neutral.

18. In order not to cause mistakes or confusion among the users of information, a journalist is obliged to maintain a formal and rigorous distinction between information and advertising. Therefore, it is considered ethically incompatible to simultaneously practice journalism and advertising. Equally, this incompatibility applies to all activities related to social communication which may imply a conflict of interests with the journalistic profession and its principles and norms.

19. A journalist shall not accept, directly or indirectly, payments or rewards from other persons to promote, direct, affect or to publish information or opinions of any kind.

20. A journalist shall never take advantage of the information to which he/she is privileged as a consequence of his/her profession. In particular, a journalist who regularly or occasionally deals with financial issues is subject to the following regulations:

- a) He/she may not take financial advantage of financial data of which he/she has knowledge before it has been published, nor can he/she transmit such data to other persons.
- b) He/she may not write of such bonds or shares in which he/she or his/her family has a significant financial interest.
- c) He/she may not buy or sell such bonds or shares of which he/she intends to write in the near future.

ITALY

National Council Order of Journalists: Italy – National Federation of the Italian Press and National Council Order of Journalists Charter of Duties of Journalists⁴⁷¹, adopted by the National Federation of the Italian Press and National Council Order of Journalists in Rome on 8 July 1993. (Translated by the Federation.)

Introduction

A journalist’s job is based on principles of freedom of information and of opinions. It is confirmed by the Italian Constitution and governed by the second article of the Italian law no. 1969 dated on 3 February 1963⁴⁷².

“Freedom of information and of expression are the inalienable rights of all journalists. They are limited by the observance of the rules of law and subject to the protection of other people’s personality. They always follow all duties set by fealty and good faith. The respect of the truth of facts is an unbreakable duty. All incorrect news must be rectified, and mistakes must be corrected. Journalists and publishers are obliged to respect professional secrecy on the sources of a piece of information, when it is required by the fiduciary character of them; they have to promote the spirit of collaboration between colleagues, the co-operation between journalists and publishers, and the trust in press and in readers.”

The relationship of trust between information organs and the people is the foundation of every journalists’ job. To promote and cement this relationship, all Italian journalists sign the following Ethics Code (Carta de Doveri).

Principles

1. A journalist has to respect, cultivate and defend the right of information for all people; for these reasons he researches and diffuses every piece of information that he considers of public interest in observance of truth and accuracy.
2. A journalist researches and spreads news of public interest in spite of the obstacles which can arise in his work; he makes any effort to guarantee to people knowledge and control of all public documents.
3. A journalist’s responsibility towards people always prevails above any other thing. A journalist can never subordinate his responsibility to other people’s interest and particularly to the publishers’ interest, governments’ interest or of the other organizations of the State.
4. A journalist has to respect people, his dignity and his right of secrecy, and he never discriminates between people according to their race, their religion, their sex, their mental and physical condition, or their political views.

⁴⁷¹ <https://accountablejournalism.org/ethics-codes/italy-national-federation-of-the-italian-press-and-national-council-order-o>

⁴⁷² <https://www.fnsi.it/upload/9b/9bf31c7ff062936a96d3c8bd1f8f2ff3/244248f7f9211db2c6faf72229ddd0e4.pdf>

5. A journalist rectifies, swiftly and accurately, his mistakes or his imprecisions in conformity with the duty to rectify and with what is established by law.
6. A journalist always respects the right of presumption of innocence.
7. A journalist has to observe the professional secrecy, when it is required by the fiduciary character of his sources. In any other cases a journalist has to respect the transparency of the sources.
8. A journalist cannot adhere to secret associations or act in any way in conflict with the eighteenth article of the Italian Constitution.
9. A journalist cannot accept benefits, favours or tasks that make dependent his autonomy and his professional credibility. A journalist cannot omit facts or essential details for a complete reconstruction of events. Titles, summaries, photos and subtitles must not either distort reality or change the content of articles and news.
10. A journalist must not publish images and photos of people involved in daily episodes particularly terrifying, taking care to preserve people's dignity. Nor must he dwell upon details of violence or brutality, unless there is a pre-eminent reason of social interest. He must not interfere with reality to create artificial images.
11. Comments and opinions belong to the right of speech and of criticism and, therefore, they have to be absolutely free from any obligation, except for the constraint set by law against offence, defamation and violence against people.

Duties

12. A journalist is responsible for his job towards people. He has to favour their dialogue with the ombudsman. He has to create various instruments (reader's guarantee, pages for readers, spaces for reply etc.), giving a wide diffusion to their activity.
13. A journalist only accepts suggestions and instructions from the editorial hierarchy of his newspaper, as long as the dispositions are not against the professional law, against the national Italian journalist's work contract (CNLG) and are in accordance with the Ethics Code (Carta di Doveri).
14. A journalist cannot discriminate between people according to their race, their religion, their mental and physical conditions, or their political opinions. Extenuating circumstances, insulting or denigratory references concerning people and their privacy, are only acceptable when they are of relevant public interest.
15. A journalist respects the right of secrecy of every person, and he cannot publish news of their private life, unless they are transparent and of relevant public interest. However, he always makes his identity and profession known when he collects such news. Names of the relations of people involved in such daily events cannot be published, unless they are of relevant public interest; nor can they be made known in case of danger of people's safety, nor can publish other elements be published, that can make clear people's identity (photos, images). Names of victims of sexual violence can be neither published, nor can the journalist give details that can lead to their identification, unless it is required by the victims themselves for relevant general interest.
16. A journalist has to proceed with great caution in publishing names or elements that can lead to the identification of members of the legal team or of the police, when they can provoke the risk of endangerment for themselves or their families.

Rectification and reply

17. A journalist respects the inviolable people's right to the rectification of incorrect news or wrong facts that are considered prejudicial to people's interests.
18. A journalist makes rectification, therefore, with timeliness and appropriate emphasis, also in case of a lack of a specific required of all news that, after their wide diffusion (spreading), seem to be incorrect or erroneous, especially when the mistakes can damage people, organizations, categories, associations and communities. When a journalist makes a charge against people, he does not spread news damaging a person's reputation or dignity without giving the opportunity of reply to the person concerned. Should this be impossible (because the person is impossible to find or he doesn't want to reply) he has to inform the readers and the public of this fact. In any case, before publishing a piece of news concerning the investigations' warning by a judge, he has to establish whether the charged person is aware of it.

Presumption of innocence

19. In all the process and investigations, a journalist has always to remember that every person charged of an offence is innocent until the final judgement. He must not spread news in order to introduce him as guilty person when he has not been judged guilty in such a process.
20. A journalist must not publish images that present deliberately or artificially as offenders people that have not been judged as guilty persons in a process. In case of the accused's acquittal a journalist has always to give an appropriate journalistic emphasis to the piece of news, also giving a referral to all news and articles previously published.

Sources

21. A journalist has to observe the maximum caution in spreading news, names and images of charged people for habitual

offences of a minor nature, except in case of particular social interest.

22. A journalist has to check all information obtained from his sources. He must accept responsibility for what he says, and must always safeguard the substantial truth of facts. In cases here the sources require anonymity, a journalist has to respect the professional secret and has to be able to inform the reader of such circumstance. In any other case a journalist must always respect the principle of more transparency of the sources of information, giving the readers or the audience the maximum and possible attention to them. The fulfilment of an obligation to the quotation of a source is particularly important when a journalist uses a piece of news from a press agency or from any other source of information, unless the piece of news is not correct or widely spread with own means, or unless it is modified as far as the meaning and the content are concerned. In all the other cases a journalist accept conditioning derived from the sources for the publication or the abolition of a piece of information.

Information and advertising

23. All people have the right to receive correct information, always distinct from an advertising message and not prejudicial to everyone's interests. The advertising message must always be distinguishable from journalistic documents through clear indications.

24. A journalist has to observe all principles signed in the Protocol's Agreement on Transparency of Information and of the national Italian journalists' work contract (CNLG); he has to make known the advertisement, however, he has to enable people to recognize a journalistic job from a promotional message.

Incompatibility

25. A journalist can never use economic or financial information that he knows to his personal benefit, nor can he disturb the state of the stock market, spreading news and events that are to his own advantage.

26. A journalist cannot write articles or news concerning the trend of the market in which he has a direct or indirect financial interest. He cannot sell or buy stock in which he is professionally involved or with which he is going to be concerned shortly.

27. A journalist refuses payments, refund of expenses, donations, free holidays, duty travels, pleasure trip gifts, or facilities, that can damage his credibility and professional dignity.

28. A journalist cannot accept tasks which conflict with the autonomous discharge of his own duties, nor lend his name, voice or image for advertising enterprises that are incompatible with the safeguarding of a professional journalists' autonomy. He is allowed, instead, to give free of charge some services for advertising enterprises, for a social, humanitarian, cultural, religious or artistic task, or for a trade union. However, this must be without a speculative character.

Children or weak people

29. A journalist respects all principles confirmed in the ONU Convention dated 1989 on the right of children and their rules undersigned by the "Treviso Ethic Code" (Carta di Treviso) to protect children, their character and their personality, both as an active protagonist and as a victim of a common-law offence and particularly:

- a) a journalist doesn't publish a name or any other element that can lead to the identification of people involved in the daily episodes or events;
- b) he has to avoid eventual instrumentalizations by all adults that brings to represent and make exclusively his own interest;
- c) however, he values if the spread of the news concerning children brings effectively to the interest of the minor himself.

30. A journalist protects the rights and dignity of people with mental or physical handicap in analogy with what is confirmed by the Treviso Ethic Code (Carta di Treviso) about children.

31. A journalist protects the rights of the invalid, avoiding sensational publication of news on medical arguments that can bring fear and groundless hopes.

- a) he does not spread news that is not confirmed by important scientific sources
- b) he does not quote the name of commercial drugs and products in order to favour a consumer product.
- c) he spreads in timely fashion the commercial names of pharmaceutical products that are withdrawn or suspended from circulation because they damage people's health.

32. A journalist pledges to use maximum respect towards subjects of daily life that for social, economic or cultural reasons can be regarded as minor instruments of self-protection.

POLICIES TO ADDRESS DISINFORMATION

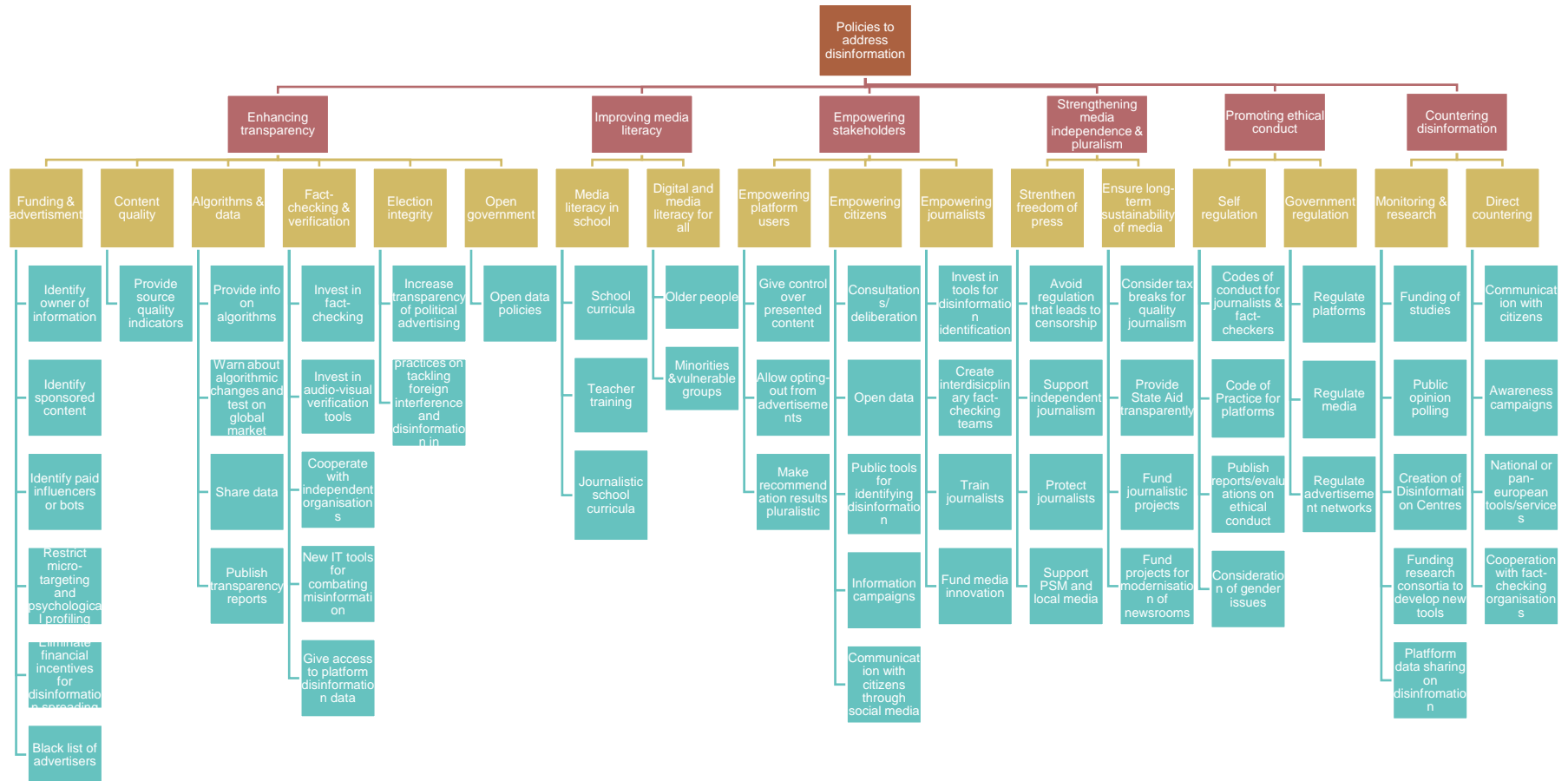


Figure 19 - Disinformation response classification framework including main policy recommendations/responses per policy category

ANNEX IV

POLICY RECOMMENDATIONS

Table 1: Summary of the policy recommendations proposed by different institutions and organisations

Policy dimension	Policy category/ Policy recommendation or response	Recommended by							Primary actor ⁴⁷³	Target ⁴⁷⁴	Level
		HLEG	EPC	Council of Europe	EC democracy action plan	UNESCO	OECD	UN - HRC			
Enhancing transparency	Funding & advertisement	x	x	x	x	x	x	x	Media, platforms, government, advertisers	Users	Platform, outlet
	Identify owner of information	x		x					Media, platforms	Users	Platform, outlet
	Identify sponsored content	x		x	x		x	x	Media, platforms	Users	Platform, outlet
	Identify paid influencers or robots	x		x	x		x		Platforms	Users	Platform, outlet
	Restrict micro-targeting and psychological profiling				x		x	x	Platforms, advertisers	Users	Platform
	Advertising black list of suspicious sites		x						Government	Advertisers	European
	Eliminate financial incentives for disinformation spreading	x		x	x	x		x	Platforms, advertisers	Users	Platform
	Content quality	x		x	x	x			Platforms	Users	Platform
	Provide source quality indicators	x		x	x	x			Platforms	Users	Platform
	Algorithms & data	x	x	x	x	x	x	x	Platforms	Researchers, Users, Governments, Civil society	Platform

⁴⁷³ who will initiate the response

⁴⁷⁴ who will benefit / be affected by the response

Policy dimension	Policy category/ Policy recommendation or response	Recommended by							Primary actor ⁴⁷³	Target ⁴⁷⁴	Level
		HLEG	EPC	Council of Europe	EC democracy action plan	UNESCO	OECD	UN - HRC			
	Provide info on algorithms	x	x	x	x	x	x	x	Platforms	Researchers, Public	Platform
	Warn about algorithmic changes and test them in global scale	x	x	x					Platforms	Civil society, public, platforms	Platform
	Share data	x	x	x	x	x	x	x	Platforms	Researchers, Civil society	Platform
	Publish transparency reports				x	x	x	x	Platforms	Public	Platform
	Fact checking & verification	x	x	x	x	x	x	x	Media, platforms, researchers, civil society	Journalists, Moderators, Researchers, Civil society, Government, J	Platforms, outlets, national, international
	Invest in fact-checking	x	x	x					Media, platforms	Journalists, platform moderators	Platform, outlet
	Invest in audio-visual verification tools	x		x					Media, platforms	Journalists, platform moderators	Platform, outlet
	Cooperate with independent organisations	x		x	x				Media, platforms	Journalists, platform moderators	Platform, outlet (national, European, international)
	Develop new IT tools for combating disinformation	x							Platforms, researchers, civil society	Journalists, Governments, Platform moderators	Platform, international
	Give access to disinformation data	x	x		x	x	x	x	Platforms	Researchers, Civil society, Government	Platform (national, international)
	Election integrity			x	x	x			Government	Citizens	National, European
	Increase transparency of				x	x			Government,		

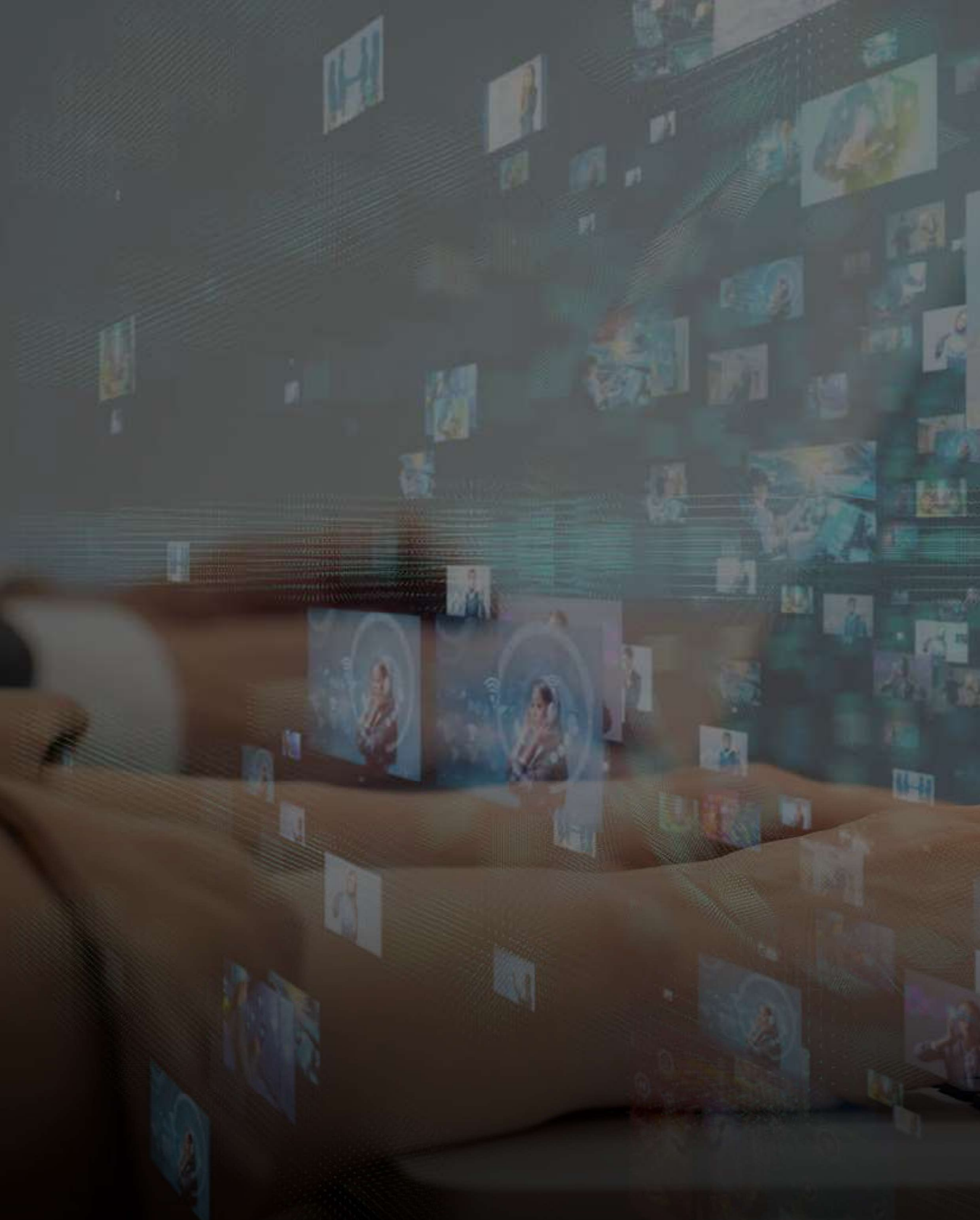
Policy dimension	Policy category/ Policy recommendation or response	Recommended by							Primary actor ⁴⁷³	Target ⁴⁷⁴	Level
		HLEG	EPC	Council of Europe	EC democracy action plan	UNESCO	OECD	UN - HRC			
	political advertising								platforms		
	Best practices on tackling foreign interference and disinformation in elections			x	x	x			Government		European, international
	Open government					x	x	x	Government	Citizens, researchers, journalists	National, European
	Promote open data policies					x	x	x	Government	Citizens, researchers, journalists	National, European
Improving media literacy	Media literacy in school	x	x	x	x	x	x	x	Ministries of Education, society	Schools, universities	National, European
	School curricula	x	x	x	x		x	x	Ministries of Education	Schools	National
	Teacher training	x		x	x				Ministries of Education, society	Teachers	National, European
	Journalistic school curricula	x		x					Ministries of Education	Schools	National
	Digital and media literacy for all	x	x	x		x	x	x	Ministries of Education, society	Citizens	National, European
	Older people	x	x			x	x	x	Ministries of Education, society	Citizens	National, European
	Minorities & vulnerable groups		x					x	Ministries of Education, society	Citizens	National, European
Empowering stakeholders	Empowering platform users	x		x			x	x	Platforms	Users	Platform (international)
	Give control over presented content	x		x				x	Platforms	Users	Platform (international)

Policy dimension	Policy category/ Policy recommendation or response	Recommended by							Primary actor ⁴⁷³	Target ⁴⁷⁴	Level
		HLEG	EPC	Council of Europe	EC democracy action plan	UNESCO	OECD	UN - HRC			
)
	Allow opting-out from advertisements							x	Platforms	Users	Platform (international)
	Make recommendation results pluralistic	x		x					Platforms	Users	Platform (international)
	Empowering citizens	x	x	x	x	x	x		Government, civil society, platforms	Citizens	National, European
	Consultations/ deliberation		x		x			x	Government	Citizens	National, European
	Open data					x	x		Government	Citizens	National, European
	Public tools for identifying disinformation	x							Researchers, platforms	Citizens	International, platform
	Information campaigns		x	x				x	Government, civil society	Citizens	National, European
	Communication with citizens through social media							x	Government	Citizens	National, European
	Empowering journalists	x					x	x	Media, civil society, government	Journalists, media	National, European, outlet
	Invest in tools for disinformation identification	x						x	Media	Journalists	National, European, outlet
	Create interdisciplinary fact-checking teams	x							Media	Journalists	National, European, outlet
	Train journalists	x						x	Media, civil society, government	Journalists	National, European
	Fund media innovation	x							Platforms, government, media	Media	European

Policy dimension	Policy category/ Policy recommendation or response	Recommended by							Primary actor ⁴⁷³	Target ⁴⁷⁴	Level
		HLEG	EPC	Council of Europe	EC democracy action plan	UNESCO	OECD	UN - HRC			
Strengthening media independence and pluralism	Strengthen freedom of press	x	x	x	x	x	x	x	Government	Media, platforms	National, European
	Avoid regulation that leads to censorship	x	x			x	x	x	Government	Media, platforms	National
	Support independent journalism	x	x	x	x	x	x	x	Government	Media	National, European
	Protect journalists	x			x			x	Government	Media	National, European
	Support PSM and local media	x		x	x	x	x		Government	Media	National
	Ensure long-term sustainability of media	x		x	x		x		Government	Media	National, European
	Consider tax breaks for quality journalism	x				x	x		Government	Media	National
	Provide State Aid/ advertising transparently	x		x	x				Government	Media	National
	Fund independent journalistic projects	x					x		Government	Media	National, European
	Fund projects for modernisation of newsrooms	x							Government	Media	European
Promoting ethical conduct	Self-regulation	x	x	x	x	x		x	Platforms, media	Journalists, platforms	National, European, platform, outlet
	Codes of conduct for journalists & fact-checkers	x	x	x	x				Media, checkers	fact- Platforms	National, European, outlet
	Code of Practice for platforms	x	x		x				Platforms	Platforms	European, platform
	Publish reports/evaluations on ethical conduct		x						Platforms	Public Government, civil society	Platform (European)

Policy dimension	Policy category/ Policy recommendation or response	Recommended by							Primary actor ⁴⁷³	Target ⁴⁷⁴	Level
		HLEG	EPC	Council of Europe	EC democracy action plan	UNESCO	OECD	UN - HRC			
	Consideration of gender issues					x		x	Platforms, media	Public	International, platform, outlet
	Mechanism to monitor government initiatives against disinformation and adherence with human rights		x				x		Institutions	Government	European
	Government regulation		x	x	x	x	x	x	Government	Platforms, advertisers	National, European
	Regulate platforms		x	x	x	x	x	x	Government	Platforms	National, European
	Regulate media							x	Government	Platforms	National, European
	Regulate advertisement networks				x	x	x		Government	Platforms, advertisers	
Countering disinformation	Monitoring & research	x	x	x	x	x	x	x	Government, platforms, civil-society	Government, researchers, civil-society	National, European
	Funding of studies	x		x	x	x	x	x	Government, platforms, civil-society	Government, researchers, civil-society	National, European
	Public opinion polling		x						Government	Government, researchers	National, European
	Creation of Disinformation Centres	x							Government	Government, researchers	National, European
	Funding research consortia to develop new tools	x		x	x	x	x		Government	Government, researchers	European
	Sharing platform data on disinformation	x	x	x	x	x	x	x	Platforms	Government, researcher, civil society	National, European
	Direct countering		x		x	x	x		Government, civil society, media, platforms	Users, citizens, journalists, governments	National, European, platform,

Policy dimension	Policy category/ Policy recommendation or response	Recommended by							Primary actor ⁴⁷³	Target ⁴⁷⁴	Level	
		HLEG	EPC	Council of Europe	EC democracy action plan	UNESCO	OECD	UN - HRC				
											outlet	
	Communication with citizens							x	Government, society	civil	Citizens	National, European
	Awareness campaigns							x	Government, society	civil	Citizens	National, European
	National or pan-European tools/services		x		x			x	Government, society	civil	Governments (and citizens)	National, European
	Cooperation with fact-checking organisations	x			x			x	Government, society, platforms	civil media,	Users, citizens, journalists, governments	National, European, platform, outlet



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